

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT

Jennifer Schroeder, Elizer Eugene Darris,
Christopher James Jecevicus-Varner, and
Tierre Davon Caldwell,

Plaintiffs,

v.

Minnesota Secretary of State Steve Simon,
in his official capacity,

Defendant.

Case Type: Civil
Court File No. ____

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

INTRODUCTION

1. Plaintiffs are citizens of Minnesota who have been denied the right to vote. They bring this civil action under the Minnesota Constitution to remedy the Defendant's unconstitutional deprivations of their fundamental constitutional right to participate in the democratic process.

2. Each Plaintiff has been convicted of at least one of the hundreds of crimes classified as a felony in Minnesota, has completed any required period of incarceration, and is currently on parole, probation, or some other form of supervised release. As such, Plaintiffs have been deemed safe to live in their communities where they raise their children, contribute to Minnesota's economic, cultural, religious, civic and political life, pay taxes, and bear the consequences of the decisions made by their governments.

3. Notwithstanding their status as contributing members of society whose full integration is central to their continued success in the community, Minnesota denies Plaintiffs an essential indicium of citizenship, the right to vote.

4. Under Article VII of the Minnesota Constitution, a Minnesota citizen who is convicted of a felony is automatically disenfranchised until their civil rights have been restored. However, Minnesota Statute Section 609.165, subdivisions 1-2 restores the right to vote only upon discharge, which is achieved by court order or upon expiration of sentence. No legitimate or rational government interest is served by refusing to restore the right to vote until discharge. In many instances, Minnesota citizens who have been convicted of a felony never see the inside of a prison, but are placed on extremely long periods of probation or supervised release that can last for decades. Consequently, these citizens live, work, marry, have kids, send their kids to school, play, shop, pay taxes, volunteer, worship, and otherwise participate in Minnesota communities for years while being denied the right to vote.

5. The system of restoring civil rights, as set forth in Section 609.165, subdivisions 1-2 and as applied by the Defendant, is unconstitutional and must be invalidated to immediately restore the right to vote to people convicted of felonies who have been released or excused from incarceration. The current system denies Minnesota citizens the fundamental right to vote with no valid justification. Indeed, it ignores the criminal justice system's interest in reformation, redemption, and reintegration. It ignores the role of voting as a fundamental right. And it ignores the harsh impact that racial disparities and inequities in the criminal justice system and voting disenfranchisement have on people and communities of color. Accordingly, Minnesota's statutory scheme for restoring the voting rights of citizens convicted of a felony and living in their communities cannot be squared with the Constitution's guarantee of equal protection, due process, and the fundamental right to vote.

6. Because Minnesota's disenfranchisement of Plaintiffs, and those similarly situated, violates the right to equal protection, the right to due process, and the fundamental right to vote, Plaintiffs seek declaratory and injunctive relief restoring their right to vote.

THE PARTIES

7. Plaintiff Jennifer Schroeder is a Minnesota resident. She has been denied the right to vote since a 2013 conviction for drug possession. Ms. Schroeder was sentenced to one year in a county jail and was released more than five years ago. Because her sentence included forty years of probation, the State's restoration scheme has prevented Ms. Schroeder from voting in any election since her release and will continue to disenfranchise her until 2053. Ms. Schroeder values the right to vote and continues to be injured by her disenfranchisement.

8. Plaintiff Elizer Eugene Darris is a Minnesota resident. He has been denied the right to vote since a 2001 conviction for second-degree homicide. Mr. Darris served seventeen years in state prison and was released more than two years ago. Due to the State's restoration scheme, Mr. Darris has been denied the right to vote since his release and remains ineligible to vote until 2025. Mr. Darris values the right to vote and continues to be injured by his disenfranchisement.

9. Plaintiff Christopher James Jecevicus-Varner is a Minnesota resident. He has been denied the right to vote since a 2009 conviction related to drug possession. Because the sentence for his most recent conviction included twenty years of probation, the State's restoration scheme will prevent Mr. Varner from voting in any election until 2034. Mr. Varner values the right to vote and continues to be injured by his disenfranchisement.

10. Plaintiff Tierre Davon Caldwell is a Minnesota resident. He has been denied the right to vote since a 2010 conviction for assault. Mr. Caldwell served just over seventy-three months in state prison and was released more than two years ago. He is currently on probation

and due to the State's restoration scheme, remains ineligible to vote. Mr. Caldwell values the right to vote and continues to be injured by his disenfranchisement.

11. Defendant Steve Simon is sued in his official capacity as the Minnesota Secretary of State (the "Secretary"). The Secretary has sworn under oath to uphold the Constitution of the State of Minnesota in carrying out his duties, which include serving as the chief election officer of the State and overseeing elections and election laws in the State.

12. The Secretary acts on behalf of the State of Minnesota in exercising his duties regarding federal, state, county and local elections, promulgating and executing election laws within the State, and upholding the constitutionally protected right to vote.

13. The Secretary's oversight of elections includes the registration process for persons eligible to vote in any election within the State, and the implementation of Section 609.165. Pursuant to Minnesota Statute Sections 201.021-201.22, the Secretary is responsible for defining, maintaining, and administering the permanent, centralized, interactive, computerized statewide voter registration list of every legally registered voter in the State. Section 201.221 requires the Secretary of State to make rules for the administration of the voter registration system. Section 201.145, subdivision 3 requires the Secretary of State to use information received from the Commissioner of Corrections and the State Court Administrator to prepare a list of registered voters who have been convicted of a felony and who have an active felony sentence, for the purpose of enforcing Section 609.165.

PROPER JURISDICTION

14. This Complaint raises claims under the Minnesota Constitution and laws of the State of Minnesota. Thus, this Court has jurisdiction over all of Plaintiffs' claims.

15. This Court is authorized to grant declaratory relief pursuant to the Declaratory Judgments Act. Minn. Stat. § 555.01. The Declaratory Judgments Act "is remedial, intended to

settle and to afford relief from uncertainty with respect to rights, status, and other legal relations.” *Holiday Acres No. 3 v. Midwest Fed. Savs. & Loan Ass’n of Minneapolis*, 271 N.W.2d 445, 447 n.2 (Minn. 1978); *see also* Minn. Stat. § 555.12 (stating that the Act “is to be liberally construed and administered”).

16. District courts of Minnesota are courts of general jurisdiction. Minn. Stat. § 484.01; Minn. Const. art. VI, § 3. Under Minnesota Rule of Civil Procedure 65, district courts also have the authority to grant injunctive relief.

17. Venue in Ramsey County is proper under Minnesota Statute Section 542.03.

LEGAL BACKGROUND

18. The Minnesota Constitution was adopted on August 29, 1857.

19. The Minnesota Constitution does not include an explicit Equal Protection clause. However, citing Article 1, Section 2 of the Minnesota Constitution, the Minnesota Supreme Court has held that the Minnesota Constitution “embodies principles of equal protection synonymous to the equal protection clause of the Fourteenth Amendment to the United States Constitution.” *In re Guardianship of Durand*, 859 N.W.2d 780, 784 (Minn. 2015) (quoting *State v. Russell*, 477 N.W.2d 886, 889 n.3 (Minn. 1991)). Equal protection of the right to vote is fundamental to the integrity of Minnesota’s constitutional order and democratic system of government.

20. In cases where a classification “appears to impose a substantially disproportionate burden on the very class of persons whose history inspired the principles of equal protection,” Minnesota courts apply a heightened level of review to the equal protection claim. *Russell*, 477 N.W.2d at 889 (Minn. 1991).

21. The Minnesota Constitution includes a Due Process clause, providing that “[n]o person shall . . . be deprived of life, liberty or property without due process of law.” Minn. Const.

art. I, § 7. In addition to affording procedural protections, the Due Process clause includes substantive protection of fundamental rights, such as the right to vote.

22. Article VII, Section 1 of the Minnesota Constitution guarantees citizens the right to vote.

23. In Minnesota, the “exercise of the political franchise” – the right to vote – is a fundamental right. *Ulland v. Grove*, 262 N.W.2d 412, 415 (Minn. 1978).

24. Where a Minnesota resident “has been convicted of treason or felony,” that individual’s right to vote is impaired only until he or she is “restored to civil rights.” Minn. Const. art. VII, § 1; *see also* Minn. Stat. § 201.014, subd. 2(1).

25. Section 609.165, subdivision 1 denies the right to vote until completion of a legislatively created process that the statute calls “discharge.” Minn. Stat. § 609.165, subd. 1. As defined by the legislature, “discharge” occurs either “by order of the court following stay of sentence or stay of execution of sentence . . . or . . . upon expiration of sentence.” Minn. Stat. § 609.165, subd. 2.

26. The legislatively created system of discharge violates the equal protection guarantee of the Minnesota Constitution.

27. The legislatively created system of discharge violates the due process guarantee of the Minnesota Constitution.

28. The legislatively created system of discharge violates the fundamental right to vote protected under the Minnesota Constitution.

29. By disenfranchising individuals living in the community subject to terms of probation, parole, or supervised release, the legislatively created system of discharge further

unlawfully violates Article VII by disenfranchising Minnesotans who have been restored to civil rights under the meaning of Article VII.

FACTUAL BACKGROUND

I. HISTORY OF FELONY DISENFRANCHISEMENT IN MINNESOTA

A. Minnesota Constitution Article VII, Section 1: Voting Rights and Restoration

30. Article VII, including its language regarding felony disenfranchisement and restoration, was included in the original Minnesota Constitution adopted on August 29, 1857.

31. Beyond the text itself, little evidence exists regarding the intentions of those who drafted, framed, and ratified Article VII, Section 1's felony disenfranchisement and restoration provision. There is no evidence that the provision was debated.

32. With extension of the franchise to women, all races, and those over eighteen, nearly every adult citizen in Minnesota possesses the right to vote. Article VII mandates a broad, inclusive approach to voting rights. Dating to the adoption of the Minnesota Constitution, Minnesota advanced an inclusive approach to the franchise that outpaces other states and ensures the rights of individuals to participate in the political process.

33. Article VII provides specific, narrowly enumerated exceptions to that broad protection of the franchise. While citizens convicted of a felony are one of three such exceptions, Article VII limits their disenfranchisement by providing that citizens convicted of a felony shall be entitled to vote when "restored to civil rights."

34. Thus, Article VII rejected permanent felony disenfranchisement. Instead, its terms mandate restoration of voting rights.

35. In 1963, the Minnesota Criminal Code was broadly restructured. Section 609.165, subdivision 1 was adopted as part of this restructuring. There is no available legislative history regarding the intent behind the enactment of this provision. No legislative history or record

explains or attempts to justify Minnesota's deferment of restoration until the legislatively created point of "discharge" and the refusal to allow citizens living in their communities to vote. Nor does the text of the statute state any government purpose for this limitation on voting rights.

B. Minnesota's Criminal Justice System Expansion and Adverse Impact on Voting Rights

36. Changes to Minnesota's criminal justice system have significantly affected the interplay between Section 609.165, subdivision 1 and Article VII, with the effect that thousands of people are convicted of felonies and disenfranchised for years even though they responsibly live in Minnesota's communities.

37. First, starting as early as 1909, Minnesota adopted alternatives to incarceration for felony convictions, including fines and probation. In the intervening years, it has developed and expanded community sentencing, including parole, probation, supervised release, and other alternatives to incarceration.

38. While Minnesota's development of alternatives to incarceration has reduced incarceration rates relative to other states, Minnesota has more individuals under some form of community supervision than all but a few states. The reach of its criminal justice system has ever expanded to apply to more actions and more people, while lengthening sentences and expanding the community sentencing system.

39. The number of Minnesota residents subject to the criminal justice system highlight this point. In 2016, one in forty-one Minnesota adults was on probation or parole, making it the state with the seventh-highest supervised population in the country on a per-capita basis.

40. Second, the number of crimes defined as felonies has vastly increased since 1857. While the definition of a felony has remained relatively unchanged between 1858 and today, the

number of crimes classified as a felony has increased dramatically. In the mid-1800s, there were less than 100 felony-level crimes in Minnesota. Today that number is close to 400.

41. As the number of crimes classified as felonies has increased over time, so has the number of people trapped in the criminal justice system. In 1981, approximately 5,500 people were convicted of a felony in Minnesota. Ten years later, in 1991, the annual number of felony convictions had nearly doubled to 9,161 people. By 2016, the number had more than tripled, totaling 16,927 people convicted of a felony in Minnesota during that year.

42. Much of this increase can be attributed to the classification of low-level and nonviolent crimes as felonies, as well as the creation of entire new categories of felonies. Felony convictions can now be imposed for drug crimes, driving violations, and various other nonviolent crimes.

43. In sum, the state has categorized an ever-increasing number of crimes as felonies while expanding the reach of the criminal justice system through community sentencing. Over time, the result has been an explosion of individuals categorized as having been convicted of a felony, as well as an expansive population of individuals convicted of felonies who live in their communities as they complete their sentences.

II. EFFECTS OF THE CURRENT RESTORATION SCHEME

A. Statistics on Number of Disenfranchised Minnesotans

44. The numbers of disenfranchised Minnesotans are stark. Near the time of the Constitution's adoption, only 0.04% of Minnesota's voting-age population was disenfranchised. In the intervening years, there has been a 3,150% increase in the rate, and now approximately 1.3% of Minnesota's adult residents living in the community are estimated to be disenfranchised.

45. Based on the most recent data available, 52,336 Minnesotans, who are currently living in the community and bearing the struggles and responsibilities of citizenship, are unable

to vote due to a past felony-level criminal conviction. These Minnesota residents work, pay taxes, raise children, and contribute to their communities in countless ways while the state excludes them from the political process.

B. Disparate Impact on People of Color and Indigenous People

46. In Minnesota, people of color and indigenous people are disproportionately affected by felony disenfranchisement due to significant racial disparities in the criminal justice system.

47. Based on the most recent data available, Minnesota disenfranchises nearly 11,000 African Americans, or roughly 6% of African Americans who are old enough to vote. Although African Americans comprise about 4% of Minnesota's voting-age population, they account for over 20% of the total number of its disenfranchised voters living in the community.

48. American Indians make up less than 1% of Minnesota's voting-age population but comprise almost 7% of those disenfranchised.

49. Hispanics make up less than 2.5% of Minnesota's voting-age population but comprise almost 6% of those disenfranchised.

50. One explanation for this is Minnesota's history of targeting people of color and indigenous people for the enforcement of its drug laws. As a result, people of color and indigenous people are more likely to receive felony convictions for nonviolent drug crimes. This in turn leads to a disproportionate number of disenfranchised people of color and indigenous people.

C. Minnesota's Restoration Scheme Serves No Government Purpose

51. The right to vote is the bedrock of American democracy. As reflected in Article VII, Minnesota's system of democratic governance benefits from broad and inclusive voter participation, giving the state a strong interest in protecting and fostering the right to vote.

52. No legitimate government interest supports disenfranchising citizens who are living in the community and denying them the right to vote until the community-supervision elements of their sentence have been completed. The fifty-five years since the passage of Section 609.165 have demonstrated that disenfranchisement undermines rehabilitation, increases recidivism, alienates individuals from their communities, and fails to achieve any deterrent effect.

53. Individuals who vote tend to be more active in their communities. For people living in the community with a felony conviction, voting connects them to their communities and reduces recidivism. The criminal justice system's interest in rehabilitation and deterrence are advanced by restoration of voting rights to individuals who live in their communities. In addition, children are more likely to vote as adults if they are raised by parents who vote.

54. Prohibiting the right to vote to those with felony convictions who live in their communities under some form of continuing supervision isolates them, denies their government the benefit of their participation, and serves no countervailing purpose.

55. Particularly given the recognition that Minnesota's criminal justice system should serve its goal of rehabilitating people convicted of felonies to full, participating members of their communities, the statutory scheme serves no valid legislative interest. Rather, state interests are harmed by the restoration scheme currently in effect.

56. The Plaintiffs' experiences illustrate the deep and adverse impact of Minnesota's system of disenfranchising individuals who live in the community under parole, probation, or supervised release following a felony conviction.

- In addition to working to maintain her recovery from drug addiction, Ms. Schroeder works as an alcohol and drug counselor treating chemically addicted

adults. Active in her church and community, Ms. Schroeder has been outspoken about her desire to participate in elections and her frustration that Minnesota has disenfranchised her until she turns 71.

- Since his release from incarceration, Mr. Darris has been an active citizen, contributing to the economic well-being of his community as a small business owner and the social well-being of this State as a social justice advocate and organizer. He teaches and mentors young men in high school through programs like Boys of Hope. Mr. Darris also serves on the Board of Directors for Appetite for Change, a social justice and food advocacy nonprofit. He is engaged with political issues and has organized numerous get-out-the-vote campaigns, yet he is unable to fulfill what he believes to be a cherished civic duty – voting.
- Mr. Varner is an electrician with a loving family that includes children and grandchildren. He is injured not only by his inability to vote while working and living in the community, but by being unable to tell his children and grandchildren that he voted. Mr. Varner views his union as critical to his livelihood, and he is concerned that he has no ability to vote in elections that impact his work, his union, and his rights.
- Mr. Caldwell is an active community volunteer in addition to working in construction. Among other things, he volunteers his time to the FBI's Community Outreach program, the Power of the People program, the Father's Project, and the Minnesota African American Museum. He is frustrated by his inability to vote and the fact that he cannot even vote in school board elections deciding

educational policy affecting his two children. He is concerned that he is unable to teach his children the value of voting when he cannot vote himself.

57. No governmental interest is served by denying the Plaintiffs the right to vote. The Plaintiffs have worked hard to rehabilitate themselves, reintegrate into their communities, and become active, contributing citizens of the State. They bear the costs of citizenship, and all levels of government directly influence their lives as they live and participate in the community. While denying them the status of citizens eligible to vote and participate in elections, Minnesota has never articulated any government interest that justifies such treatment. None exists.

CLAIMS FOR RELIEF

Claim I: Violation of the Equal Protection Guarantee of the Minnesota Constitution

58. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

59. Article VII, Section 1 of the Minnesota Constitution provides a fundamental right for Minnesota citizens to vote, including those convicted of a felony following restoration.

60. By establishing a restoration scheme that fails to restore voting rights to all citizens convicted of felonies but who live in their communities and are not incarcerated, Minnesota Statute Section 609.165, subdivisions 1-2 has resulted in the irrational denial of the fundamental right to vote to those individuals.

61. Section 609.165, subdivisions 1-2 impermissibly categorizes and discriminates against individuals who have been convicted of a felony, and it treats similarly situated individuals differently with respect to a fundamental right.

62. No sufficient legislative purpose justifies treating individuals who live, work, and contribute to their communities differently with respect to the right to vote because of a previous felony conviction or on the basis that the non-incarceration elements of a felony sentence have

not been completed. Once individuals are living in the community, the difference between those formerly convicted of a felony and their neighbors is not “genuine and substantial.”

63. Section 609.165, subdivisions 1-2 does not meet the needs peculiar to the class of people affected by it. It is neither tailored to nor the least restrictive means of achieving a genuine, rational, or substantial government purpose.

64. Furthermore, Minnesota’s scheme for restoration of voting rights has an unlawful disparate impact on people of color and indigenous people.

65. With respect to the right to vote, there are also no genuine or substantial distinctions between Plaintiffs and other Minnesota citizens who possess the right to vote.

66. No rational, reasonable, or compelling government interest supports the unequal treatment of Plaintiffs and denial of their fundamental right to vote.

67. Minnesota Statute Section 609.165, subdivisions 1-2 and Defendant’s enforcement of it violate the inherent but unenumerated Equal Protection guarantee of Article I, Section 2 of the Minnesota Constitution.

Claim II: Violation of the Due Process Clause of the Minnesota Constitution

68. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

69. Article I, Section 7 of the Minnesota Constitution provides that “[n]o person shall . . . be deprived of life, liberty or property without due process of law.”

70. The right to vote is a liberty protected by the Due Process clause, and it is a fundamental right.

71. Minnesota courts apply strict scrutiny to laws and regulations that limit fundamental rights, including the fundamental right to vote. *Ulland*, 262 N.W.2d at 415

("[A]lthough the United States Supreme Court has frequently acknowledged the breadth of the states' powers over the mechanics of the electoral process, regulations which have the effect of infringing the right to vote will be strictly scrutinized.")

72. Defendant violates the Due Process clause by denying Plaintiffs the right to vote. Specifically, Minnesota Statute Section 609.165, subdivisions 1-2 and its enforcement deny the fundamental right to vote to individuals who have been convicted of a felony but live in their communities.

73. When the state has already found that individuals previously convicted of a felony are fit to live among their fellow citizens, continuing to withhold access to the franchise is arbitrary and unjustified. Depriving such individuals of the right to vote is not tailored to achieve any rational, reasonable, or compelling government interest.

74. Defendant lacks a rational, reasonable, or compelling basis for depriving Plaintiffs of their right to vote.

Claim III: Violation of the Minnesota Constitution's Right to Vote

75. Plaintiffs incorporate by reference the foregoing paragraphs as though fully set forth herein.

76. Article I, Section 2 and Article VII, Section 1 of the Minnesota Constitution guarantee the right to vote to Minnesota residents.

77. Minnesota Statute Section 609.165, subdivisions 1-2, and Defendant's enforcement of that statute deny Plaintiffs the right to vote in violation of that constitutional guarantee.

78. The legislatively created process of discharge violates the constitutional guarantee of Plaintiffs' right to vote.

79. Because Plaintiffs live as active members of their communities, they possess the constitutional right to vote under Article VII, Section 1 of the Constitution. Minnesota Statute Section 609.165, subdivisions 1-2, and Defendant's enforcement of that statute impermissibly disenfranchises them.

80. No rational, reasonable, or compelling government interest justifies the disenfranchisement of Plaintiffs under Section 609.165, subdivisions 1-2, and Defendant's enforcement of that statute.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order for declaratory and injunctive relief as follows:

- a. Declaring that the State's denial of the right to vote to individuals who live in the community while subject to parole, probation, or another form of supervised release violates the Minnesota Constitution.
- b. Declaring that individuals are restored to civil rights and possess the fundamental right to vote guaranteed by Article VII of the Minnesota Constitution by virtue of being released or excused from incarceration following a felony. If otherwise eligible to vote, all people convicted of a felony who live in the community are declared to possess the fundamental right to vote and shall have their right to vote restored.
- c. Declaring that Minnesota Statute Section 609.165, subdivisions 1-2 shall not be read to preclude restoration of voting rights prior to discharge and shall not be interpreted in any manner inconsistent with the Court's Order.
- d. Enjoining the Secretary to immediately and permanently take steps to ensure that all individuals who have been convicted of a felony but live in the community shall have their right to vote restored.

- e. Enjoining the Secretary to immediately and permanently take all necessary measures to restore the right to vote to individuals who have been convicted of a felony but live in the community, including communication, registration, training, and any other administrative tasks necessary to ensure that the fundamental right to vote is restored and secured.
- f. Enjoining the Secretary to immediately, and on an ongoing basis, provide to counsel for the Plaintiffs a report detailing the Secretary's efforts to comply with the Court's Order.
- g. Awarding attorneys' fees and costs to Plaintiffs for this action;
- h. Granting such other relief as the Court may find necessary or appropriate.

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Respectfully submitted,

Dated: October 21, 2019

/s/ Craig Coleman

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ACKNOWLEDGMENT

The undersigned hereby acknowledges that sanctions may be imposed under Minn. Stat.

§ 549.211.

Dated: October 21, 2019

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