

SUPREME COURT OF MINNESOTA

Minnesota Voters Alliance and Kirk Stensrud v. Steve Simon, only in his official capacity as the Minnesota Secretary of State, Joe Mansky, only in his official capacity as the Ramsey County Election Manager, Virginia Gelms, only in her official capacity as the Hennepin County Election Manager, and Election Judges John and Jane Doe, only in their official capacities as Election Judges

885 N.W.2d 660 (Minn. 2016) · No. A16-0960 · Decided September 28, 2016

SUMMARY

The Minnesota Supreme Court dismissed a petition challenging Minnesota election officials’ procedures for determining voter eligibility, including the treatment of felony convictions, guardianship orders, voter-registration data, and self-certification at polling places. The court concluded that the claims were broad-ranging challenges to election policies and that, even if original jurisdiction existed under Minn. Stat. § 204B.44(a)(4), the district court offered an available and adequate forum for resolving factual and constitutional issues.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	Per curiam
JURISDICTION	Minnesota
DECIDED	September 28, 2016
DOCKET	A16-0960
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioners filed an original-jurisdiction petition under Minn. Stat. § 204B.44 seeking declaratory and injunctive relief concerning voter-registration and voter-eligibility procedures. The Minnesota Supreme Court dismissed the petition because an adequate alternative remedy was available in district court, without deciding whether the court possessed original jurisdiction.
STANDARD OF REVIEW	The court determined whether to exercise its statutory original jurisdiction and whether an adequate alternative remedy existed.

PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Minnesota
PARTIES	Minnesota Voters Alliance, Kirk Stensrud v. Steve Simon, Joe Mansky, Virginia Gelms, Election Judges John and Jane Doe

TOPICS

election law election administration appellate procedure appellate jurisdiction constitutional law

PRACTICE AREAS

Election law Appellate procedure Constitutional law Civil procedure

QUESTIONS PRESENTED

1. Whether the petition fell within the Minnesota Supreme Court's original jurisdiction under Minn. Stat. § 204B.44(a)(4).
2. Whether the Supreme Court should exercise original jurisdiction over broad, fact-intensive challenges to statewide voter-registration and voter-eligibility policies when an adequate remedy was available in district court.

HOLDINGS

1. Even assuming that Minn. Stat. § 204B.44(a)(4) conferred original jurisdiction over the petition, the Supreme Court would not exercise that jurisdiction because the claims were broad, fact-intensive, and could be adequately addressed in district court followed by appellate review.
2. The petition was dismissed.

KEY QUOTATIONS

“The broad-ranging challenges alleged here, which respondents dispute, should be addressed first in the district court, where any factual disputes can be fully litigated and resolved.” (at 673)

“We conclude only that based on the facts and circumstances relevant to the claims asserted, an exercise of original jurisdiction over this petition is not warranted.” (at 673)

FACTUAL BACKGROUND

Petitioners alleged that Minnesota election officials failed to timely update voter-registration information concerning felons and persons under guardianship whose voting rights had been restricted by court order. They also challenged procedures allowing applicants and election-day voters to self-certify eligibility, contending that those procedures could permit ineligible persons to vote and effectively nullify court orders. Petitioners alleged resulting violations of separation-of-powers principles and due process and sought relief before the November 2016 general election.

PROCEDURAL HISTORY

On June 15, 2016, petitioners filed a petition challenging election officials' procedures for identifying ineligible voters and permitting voter self-certification. The Supreme Court ordered respondents to address, among other matters, whether the petition properly invoked the court's original jurisdiction. The court concluded that, even assuming jurisdiction existed, the broad and fact-intensive claims should first be litigated in district court and dismissed the petition.

DISPOSITION

dismissed

CASES CITED

- Coleman v. Ritchie, 762 N.W.2d 218, 231 n.13 (Minn. 2009)
- Erlandson v. Kiffmeyer, 659 N.W.2d 724, 729 (Minn. 2003)
- Begin v. Ritchie, 836 N.W.2d 545, 549 (Minn. 2013)
- Minn. Majority v. Ritchie, No. A09-0950, Order at 5-6 (Minn. July 22, 2009)
- Minn. Voters Alliance v. Ritchie, 890 F. Supp. 2d 1106, 1117 (D. Minn. 2012)
- Kahn v. Griffin, 701 N.W.2d 815, 832 (Minn. 2005)
- State ex rel. Palmer v. Perpich, 289 Minn. 149, 151, 182 N.W.2d 182, 184 (1971)
- Minnesota Voters Alliance v. City of Minneapolis, 766 N.W.2d 683, 685-86 (Minn. 2009)
- Rice v. Connolly, 488 N.W.2d 241, 244 (Minn. 1992)
- Seventy-Seventh Minn. State Senate v. Carlson, 472 N.W.2d 99, 99 (Minn. 1991)
- Agin v. Heyward, 6 Minn. 110, 114, 118, 6 Gilmer 53, 57, 63 (1861)
- State ex rel. Alexander v. Rigg, 247 Minn. 110, 113, 76 N.W.2d 478, 480 (1956)
- State ex rel. Grubbs v. Schulz, 142 Minn. 112, 113-14, 171 N.W. 263, 264 (1919)
- Wichelmann v. City of Glencoe, 200 Minn. 62, 65, 273 N.W. 638, 639 (1937)