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## I N D E X

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1 NEW ORLEANS, LOUISIANA; TUESDAY, OCTOBER 16, 2012

2 8:30 A.M.

3 THE COURT: Good morning.

4 Mr. Ho, you may call your next witness.

5 MR. HO: Before that, Your Honor, we have some exhibits  
6 to move into evidence. The parties have shortened the length of  
7 the trial.

8 The first is plaintiff's Exhibit 53.

9 MS. CANGELOSI: Your Honor, that's a one-page exhibit,  
10 and the Secretary of State as agreed to the admissibility of  
11 that as well.

12 THE COURT: Admitted.

13 (Exhibit admitted.)

14 MR. HO: And we have a modified Exhibit 54. Not all of  
15 the pages in the original plaintiff's Exhibit 54 will be going  
16 in. So only those pages with the face demarcation SOS 2968.

17 THE COURT: Is that the 2010?

18 MR. HO: Yes, Your Honor.

19 THE COURT: Okay.

20 MR. HO: These are the 2010 through the first quarter  
21 of 2011, and the Bates number is SOS 2908.

22 MS. CANGELOSI: We have no objection to the  
23 admissibility of that as modified. I think it's six pages. Or  
24 10. Something like that.

25 MR. HO: Yes.

1                   Plaintiff's Exhibit 55, which is the new  
2 registration for the last three quarters of 2011.

3                   MS. CANGELOSI: No objection to the admissibility of  
4 that exhibit, Your Honor.

5                   THE COURT: Let those be admitted.

6                   (Exhibit admitted.)

7                   MR. HO: That will shorten our witness list. We will  
8 no longer being called from the Secretary of State's Office  
9 Joanne Reed and Christine Weatherford.

10                  We've also agreed to enter a stipulation, but we  
11 will have to work out the precise wording of those during the  
12 recess, both with Secretary of State and the DHH.

13                  MS. CANGELOSI: We have ours.

14                  I think that the stipulation that they asked for  
15 was that, during the year 2010, the Secretary of State's office  
16 did not conduct training at DCFS.

17                  MR. HO: I think it was training on the NVRA for the  
18 DCFS.

19                  MS. CANGELOSI: Training on the NVRA at DCFS, yes.

20                  MR. HO: So, in that case, we no longer need to call  
21 Cate McRitchie.

22                  MS. CANGELOSI: McRitchie.

23                  MR. HO: We're working out the stipulation with Philips  
24 and DCSF about something with the admissibility of certain  
25 pleadings, but we'll deal with that later.

1 THE COURT: Do we have a stipulation regarding with  
2 DCFS, or is that what we're working on?

3 MR. PHILIPS: It's the DHH WIC program. We're working  
4 on some of the things we discussed in chambers. And, as soon as  
5 we do that, we'll have a stip.

6 THE COURT: Thank you.

7 MR. HO: With those preliminary matters resolved,  
8 plaintiffs call their first witness of the morning, Mr. Luther  
9 Scott.

10 THE COURT: Mr. Scott, please come forward.

11 LUTHER SCOTT, being duly sworn, testified as  
12 follows:

13 THE COURT: Please have a seat, Mr. Scott.

14 If you'd please say your name and spell it for the  
15 court reporter, please.

16 THE WITNESS: My name is Luther Scott, L-U-T-H-E-R  
17 S-C-O-T-T. I'm a junior.

18 THE COURT: You may proceed.

19 DIRECT EXAMINATION

20 BY MR. HO:

21 Q Good morning, Mr. Scott.

22 A Good morning.

23 Q How are you today?

24 A I'm okay.

25 Q Are you here today to testify as a plaintiff in this case,



1 Mr. Scott?

2 A Yes, I am.

3 Q How old are you, Mr. Scott?

4 A Approximately 63, going on 64.

5 Q Would you tell the Court --

6 MS. CANGELOSI: Your Honor, I'm sorry to interrupt and  
7 I apologize, but I think we have some witnesses in the  
8 courtroom.

9 THE COURT: Are there any witnesses in the courtroom?

10 MR. HO: You're absolutely right.

11 THE COURT: Do I need to give him instruction, or have  
12 you --

13 MR. HO: You're right. He was not here yesterday to  
14 receive the instruction.

15 THE COURT: Please come forward, Reverend Taylor. I  
16 just want to give you some instructions.

17 The parties have requested and I have granted an  
18 order of sequestration of witnesses. And what that means is  
19 that you're not allowed to sit in the courtroom during the  
20 course of anyone's testimony. Nor are you allowed to have  
21 someone report to you what their testimony was in the courtroom,  
22 or you report to anyone else what you testified to.

23 And the purpose of this order is so that your  
24 testimony is based solely on your personal knowledge and not  
25 anything you've heard in the courtroom.

1                   So I'm going to ask you to sit outside the  
2 courtroom, and we'll call you when it's time for you to testify.

3                   REVEREND TAYLOR: Yes, ma'am, Your Honor.

4                   THE COURT: Thank you.

5                   REVEREND TAYLOR: Thank you.

6 BY MR. HO:

7 Q I apologize for that interruption, Mr. Scott.

8                   Mr. Scott, can you tell the Court a little bit  
9 about yourself.

10 A I am a native of Louisiana, lived here all my life. Vietnam  
11 veteran. Did seven years of Army Reserve. Been a citizen, like  
12 I say, in the state of Louisiana all my life. And I've lived  
13 here and did charitable things in the state of Louisiana since I  
14 lived here in the city.

15 Q You said you were a Vietnam veteran?

16 A Yes. I did 18 months in Vietnam.

17 Q And how do you make a living these days?

18 A After being in the service, I went to Delgado Junior  
19 College, took up several trades. I am a mechanic by trade, pipe  
20 fitter. So I'm more or less employed, and do things in my spare  
21 time.

22 Q Anything else other than mechanic work?

23 A Yes. Over the years, I've learned to do various things.  
24 I'm also a carpenter, sheetrock, roofer.

25 Q Fair to say, handyman?

1 A More or less, yes. Jack of all, master of none.

2 Q Where do you live right now, Mr. Scott?

3 A At the present time, I live at 2517 1/2 Magnolia Street here  
4 in New Orleans.

5 Q Did you say 2517 1/2?

6 A 2515 Magnolia Street.

7 Q And when did you begin living there?

8 A Approximately eight months ago.

9 Q Do you know how long you're going live there in the future?

10 A No, I do not.

11 Q Do you have a lease there?

12 A No, I do not have a lease.

13 Q Where did you live before you lived at 2515 Magnolia?

14 A At that time, I was living out of my car.

15 Q I'm sorry, did you say --

16 A Out of my car.

17 Q And before that?

18 A Before that, I lived on Condor Street.

19 And, before that, I lived on St. Patricks.

20 And, before that, I'd also lived on I believe it  
21 was Gravier.

22 I'm sorry, Derbigny.

23 Q You didn't live at Gravier?

24 A No, I didn't live at Gravier.

25 Q Did there come a time, Mr. Scott, that you came to apply for

1 some form of public assistance benefits?

2 A Yes, I did.

3 Q When was -- I'm sorry. I want to show you a document.

4 MR. HO: Permission to approach, Your Honor?

5 THE COURT: Yes.

6 BY MR. HO:

7 Q Mr. Scott, could you turn to the first tab in your binder.

8 This is plaintiff's Exhibit 146, which has already been admitted  
9 into the record.

10 Take a few moments to flip through that, and let  
11 me know when you're ready.

12 (Pause in proceedings.)

13 THE WITNESS: Okay.

14 BY MR. HO:

15 Q Could I direct your attention, do you see the page numbers  
16 on the bottom right-hand corner of the page?

17 A Yes, I do.

18 Q Could I direct your attention to page DCFS 9386. Take a  
19 look at that, and just let me know when you're ready.

20 A Okay.

21 Q Mr. Scott, have you seen this before?

22 A Yes, I have.

23 Q What is this?

24 A Food stamps application form.

25 Q And whose food stamps form is it?

1 A It's mine, Luther Scott.

2 Q You filled it out?

3 A Yes, sir, I did.

4 Q And is there a date on this page?

5 A Yes. It's 9/1/09.

6 Q Is that September 1st, 2009?

7 A Correct.

8 Q Can you tell me what happened on that day?

9 A I went down to the food stamps office to apply for food  
10 stamps. I initially stepped inside the building, you take a  
11 number and wait until your number's called. At the time that  
12 your number's called, you go to a receptionist or a window  
13 inside of the building, where they give you forms in order to  
14 fill out for food stamps.

15 Q And what happened next?

16 A You fill the forms out. Take that back to the window and  
17 give them back to the receptionist. And then, at that time,  
18 someone else will call your name and come out and see you.

19 Q And then what happened next?

20 A Next, they take you back to a room inside the building where  
21 this person who is supposed to be your caseworker goes over your  
22 application, makes sure that you've filled it out correctly.  
23 And then advise you what you need to do next.

24 Q And what happened after that?

25 A Well, after she checks the paperwork, we're in her office at

1 the desk, and she explains certain things to you. And that,  
2 this is regarding your food stamp application, and at that point  
3 in time she asks to you sign certain sections where she has  
4 marked.

5 Q And after that?

6 A After that, you go sit back out in the hallway. She tells  
7 you your paperwork has been completed, and you're free to leave.

8 Q And after that?

9 A After that, you leave the building.

10 Q Where is the building that you went to that day?

11 A The one is here in -- I believe it's Iberville here in New  
12 Orleans.

13 Q And let's look at that document again. And I'd like you to  
14 turn two pages forward, to page DCFS 9388. Just let me know  
15 when you're ready.

16 (Pause in proceedings.)

17 THE WITNESS: All right.

18 BY MR. HO:

19 Q Do you see near the bottom of the page a few lines down  
20 where it says mailing address?

21 A Yes, I do.

22 Q And what does it say written there?

23 A It's 1301 South Derbigny.

24 Q Is that your handwriting?

25 A Yes, it is.

1 Q Where were you living at that time?

2 A That was sort of a shelter. It was a church on South  
3 Derbigny where I was staying, versus living in my car.

4 Q Were you no longer living at St. Patrick Street at that  
5 time?

6 A No, sir, I was not.

7 Q Did you ever move back to St. Patrick Street?

8 A No, I did not.

9 Q Let's flip forward a few more pages, to DCFS 9401. Again,  
10 just let me know when you're ready.

11 (Pause in proceedings.)

12 THE WITNESS: Okay.

13 BY MR. HO:

14 Q Have you seen this before?

15 A Yes, I have.

16 Q Do you see a date on this page?

17 A Yes. It's 9/1/09.

18 Q So September 1st, 2009?

19 A Correct.

20 Q Do you see at the top of the page where it says Voter  
21 Registration?

22 A Yes, I do.

23 Q I'm going to read a line a few lines down that starts with  
24 the word If.

25 It says: If you are not registered to vote where

1 you live now, would you like to apply to register to vote.

2 Do you see that?

3 A Yes, sir, I do.

4 Q Do you see how, next to it, there are check boxes marked yes  
5 and no?

6 A Yes, I do.

7 Q Is the no box checked here, Mr. Scott?

8 A No, sir. Neither box is checked.

9 Q Did you decline to register to vote in writing?

10 A Not --

11 MR. PHILIPS: Excuse me, Your Honor, I object. That's  
12 going to a legal issue in this case.

13 MR. HO: Withdrawn.

14 MR. PHILIPS: The document speaks for itself.

15 THE COURT: Sustained.

16 BY MR. HO:

17 Q I'd like to turn your attention to another document in the  
18 binder, Mr. Scott. And it's at tab 2. We'll be coming back to  
19 this in a moment, but let's look at tab 2, which is plaintiff's  
20 Exhibit 161 and which has already been admitted into evidence.

21 Could you look at the second page, Mr. Scott?

22 A Pardon me?

23 Q Could you look at the second page in that binder, Mr. Scott?

24 A In tab 2? Tab 2.

25 Q Tab 2, yes.



1 A All right.

2 Q Do you know what this document is?

3 A Voter registration form.

4 Q Now, thinking back to that day, September 1st, 2009, on that  
5 day did there come a time that someone gave you a voter  
6 registration form?

7 A No, I did not receive a voter registration form.

8 Q Let's turn back to the first document under tab 1, and I'd  
9 like to turn to page DCFS 9407. And, again, take your time.

10 THE COURT: Help me, what's the --

11 MR. HO: I'm sorry, it is plaintiff's Exhibit 146.

12 THE COURT: Thank you.

13 THE WITNESS: All right.

14 BY MR. HO:

15 Q Have you seen this before?

16 A Yes, I have.

17 Q And what is this, Mr. Scott?

18 A It's also a food stamp application for myself.

19 Q Sorry.

20 And is there a date on this form?

21 A Yes, December 1, '09.

22 Q And whose form is this?

23 A It's my form.

24 Q I'm sorry?

25 A It's mine, Luther Scott.

1 Q Can you tell me what happened on December 1, 2009?

2 A Again, I go down to the food stamp office to apply. And,  
3 you take a number, your number's called, you go to the window,  
4 and the lady asks nature of your business and gives you the food  
5 stamp application form.

6 Q On that day, were you given a voter registration form,  
7 December 1, 2009?

8 A No, I did not.

9 Q I want to turn ahead a number of pages again to page 9422.  
10 Just let me know when you're ready.

11 A All right.

12 Q Is there a date on this page?

13 A It looks like 12/1/09; but, on my copy, it could either be  
14 12/1/09 or it looks like it could be 11/1/09.

15 Q Well, December 1, 2009 is when you applied for food stamps;  
16 is that right, Mr. Scott?

17 A Yes, it is.

18 Q So, this form, do you see at the top where it says Voter  
19 Registration?

20 A Yes, I do.

21 Q And, again, like the last one we looked at, do you see how  
22 there's a sentence on it that says: If you are not registered  
23 to vote where you live now, would you like to apply to register  
24 to vote?

25 A Yes, I do.

1 Q And is the no box checked on this form?

2 A Neither box is checked, sir.

3 Q Excuse me?

4 A Neither box yes or no box is checked, no.

5 Q But is the no box checked?

6 A No, it isn't.

7 Q And did you put your signature on this page?

8 A No, sir.

9 Q I want to turn forward again now --

10 THE COURT: Wait. Did you say: No, sir?

11 THE WITNESS: No. My signature's not on this.

12 THE COURT: All right. Thank you.

13 THE WITNESS: I did not sign it.

14 BY MR. HO:

15 Q I'd like to turn forward two pages to DCFS 9424.

16 A Got it.

17 Q Could you also, just for your own benefit, just look at the  
18 next three pages and flip through them and get familiar with  
19 them. And then I want to come back and ask about this page,  
20 9424.

21 (Pause in proceedings.)

22 THE WITNESS: All right.

23 BY MR. HO:

24 Q Have you seen this before, Mr. Scott?

25 A Yes, I have.

1 Q And what is this?

2 A This is a food stamp application change of address form.

3 Q Whose form is this?

4 A It's my form.

5 Q Is there a date on this page?

6 A Yes. It is 11/15/010.

7 Q So November 15, 2010?

8 A Correct.

9 Q And you said this is your form?

10 A Yes, it is.

11 Q Can you tell me what happened that day, November 15, 2010?

12 A Previously, I had the wrong address on my food stamp  
13 application. Several weeks later or days later, I did not  
14 receive the stamps. I called in to the office and they told me  
15 that there was mis-information on the form. So I had to come  
16 back and fill out a change of address form.

17 Q Where did you -- sorry.

18 Did there come a time that you submitted this form to  
19 anyone?

20 A Yes. You go in to the office again, building, you take a  
21 number. Your number's called. One of the receptionists will  
22 call you to the window, and proceed to ask you about the nature  
23 of your business.

24 Q Which office was this?

25 A New Orleans office, here in New Orleans.

1 Q Same one where you submitted those other two applications we  
2 talked about earlier today?

3 A Yes, it is.

4 Q And, on this day, November 15, 2010 -- excuse me -- did  
5 there come a time when you were given a voter registration form?

6 A No, I was not given a voter registration form.

7 Q Were you given any other form asking you about voter  
8 registration on that day?

9 A No, I did not receive any.

10 Q I just want to look at this form a little bit more closely.  
11 Do you see the topic where it says Louisiana Office of Family  
12 Support, Simplified Report?

13 A Yes, I do.

14 Q And do you see the next line where it says: Important, you  
15 must complete, sign and return this form and all of it required  
16 verification by -- and there's a blank space -- or your case may  
17 be closed?

18 A Yes, I do.

19 Q And then there's some numbered items here. I just want to  
20 read these to you.

21 Do you see where it says No. 1, is the address  
22 shown above correct.

23 Is that right?

24 A Yes.

25 Q And, No. 2, do you see where it says: Have you moved.

1 Is that correct?

2 A That's correct.

3 Q And No. 3 where it says: If you have moved or the address  
4 shown above is not correct, complete the information below.

5 Is that a correct reading?

6 A Yes, it is.

7 Q I want to turn forward a few pages in this document to DCFS  
8 9427. Are you there?

9 A Yes, I am.

10 Q Is there a signature on this page? I know it's a little  
11 light.

12 A Yes, it is.

13 Q Whose signature does that appear to be?

14 A That's my signature.

15 Q And is there a date?

16 A 11/15/02.

17 Q '02? I'm sorry?

18 A It's hard to make out. It looks like it could be 0-12.

19 Q Well, we were talking about a form -- this appears to be  
20 part of the same form that was dated November 15, 2010. Does  
21 that refresh your memory here, Mr. Scott?

22 A Yes.

23 Q Three pages back?

24 A Yes, yes.

25 Q Does this appear to be part of the same form?

1 A Yes, it is.

2 Q I want to move away from these forms for a moment, Mr.  
3 Scott, and ask you about something else.

4 Did there ever come a time in this case that you  
5 submitted a written statement?

6 A Yes. Yes, I did.

7 Q I want to show you tab -- I'm sorry -- tab 3 in your binder,  
8 and this is plaintiff's 234. It's been proffered?

9 MR. PHILIPS: Objection, Your Honor.

10 May I approach?

11 THE COURT: Yes.

12 (Sidebar Conference.)

13 MR. PHILIPS: It's not admissible. He can ask the  
14 questions but he can't refer to this document. It's not  
15 admissible in this trial here.

16 MR. HO: I don't plan on admitting the exhibit. I want  
17 to ask him the questions about the document itself.

18 THE COURT: I think you can ask him the questions.

19 MR. PHILIPS: That's my objection, the document is  
20 irrelevant to his testimony. So just ask the him questions,  
21 fine. But he can't refer to the exhibit in his responses.

22 THE COURT: I think you can ask him those questions.

23 (Sidebar concluded.)

24 BY MR. HO:

25 Q Mr. Scott, we're not going to look at that tab, you can

1 close your binder.

2 Do you remember signing a declaration in this  
3 case, Mr. Scott?

4 A Yes, I do.

5 Q And do you remember whether your written declaration  
6 stated --

7 (Sidebar conference.)

8 MR. PHILIPS: Your Honor, I'm sorry, it's the same  
9 objection. It's a referral to the document that's not in  
10 evidence.

11 THE COURT: I think you need to not refer to the  
12 document. You will get him to clean up whatever he needs to  
13 clean up and to explain without reference to the document.

14 (Sidebar concluded.)

15 MR. HO: May I take just a few moments, Your Honor?

16 (Pause in proceedings.)

17 MR. HO: Sorry for the interruption, Mr. Scott.

18 BY MR. HO:

19 Q At any point in time, was your recollection that the last  
20 time that you were registered to vote at a current address in  
21 New Orleans was before Hurricane Katrina in 2005?

22 A Yes, that's correct.

23 Q That was your best recollection at one point?

24 A My best memory, yes.

25 Q Did there ever come a time that you learned anything that



1 changed that recollection?

2 A Yes.

3 Q And what was that?

4 A I was presented some papers stating that I had some time in  
5 -- after Katrina, when I was living on St. Patrick Street, I  
6 believe, had filled out -- or should I say an application was  
7 filled out for me at the corner drug store or convenience store  
8 somewhere in that area.

9 Q When you say a form was filled out, what kind of form?

10 A It was a voter registration form. There were people out on  
11 the streets in the neighborhood in the area conducting voter  
12 registration.

13 Q And how long ago was that?

14 A I don't remember. Four or five years.

15 Q Do you know who these people were?

16 A No, I never saw them before.

17 Q Did you mention -- I'm sorry. Let me strike that.

18 Did there ever come a time that you learned what  
19 happened to those voter registration forms?

20 A No. I received no confirmation that the voter registration  
21 form had been properly sent to where it needed to be, and so I  
22 wasn't sure if I was a registered voter or not.

23 Q Did you ever receive any kind of confirmation in the mail  
24 that those voter registration applications had been processed?

25 A No, I did not.

1 Q Did you ever receive anything in the mail about them?

2 A No, I did not.

3 Q Let me change topics, Mr. Scott.

4 At any point in time, was it your best  
5 recollection that you had not declined to register to vote  
6 during the benefits application or renewal process?

7 A What you mean by renewal process?

8 Q Let me break it up into two pieces.

9 At any point in time, was it your best  
10 recollection that you had never declined to register to vote  
11 during the benefits application process?

12 A There's two parts of that, too.

13 I did on the last application sign no because of  
14 the fact that we were already in litigation regarding voter  
15 registration. Now at this time they wanted to give me a form  
16 asking me if I wanted to vote. And, this time, I signed no.

17 Q I want to get to that in a moment, Mr. Scott. But the  
18 question that I had was, was it your best recollection at any  
19 point that you had not declined to register to vote during any  
20 of your benefits applications?

21 A Yes.

22 Q And was there a time that came where you learned anything  
23 that changed that recollection?

24 A Yes. Recently.

25 Q And what was that?

1 A I was shown a document stating that I'd already declined by  
2 saying no on one of the applications. My last application,  
3 should I say, which was in the beginning of this year.

4 Q Around when was that?

5 A I'm not sure of the date. I think it was December 11 or  
6 somewhere in that neighborhood.

7 Q So this lawsuit was filed?

8 THE COURT: Excuse me. What year, sir?

9 THE WITNESS: It was 0-11.

10 THE COURT: In 11. I'm sorry. Go ahead.

11 BY MR. HO:

12 Q So this lawsuit was filed in April of 2011. So it was after  
13 that, in December of 2011, that this occurred?

14 A Yes.

15 Q Now, since the time that this lawsuit was filed, did there  
16 come a time when someone tried to give you a voter registration  
17 form?

18 A Yes. Several times.

19 Q Give me one example.

20 A Well, we were doing a -- one was you, my lawyer, gave you an  
21 application to give to me. And asked me if I would sign it.  
22 Fill it out and sign it at that time.

23 And there were two other times here in the  
24 courthouse where we were doing a deposition where they also  
25 offered me a voter registration form.

1 Q Let's talk about the one in your deposition.

2 Did you complete the voter registration -- first  
3 of all, I'm sorry, let me take that back.

4 But I'm talking about your deposition. Do you  
5 recall who during your deposition tried to give you a voter  
6 registration form?

7 A Yes, I do.

8 Q Who was it?

9 A The lady sitting back there in the back. I don't know her  
10 name, but with the glasses on in the right corner.

11 MR. HO: I believe the witness has identified Celia  
12 Alexander, counsel for DCFS. I want to the record to reflect  
13 that.

14 BY MR. HO:

15 Q When Ms. Alexander gave that you voter registration form,  
16 did you complete it?

17 A Not at that time, no.

18 Q And why not?

19 A I felt at that time I was -- I should have gotten this  
20 information of voter registration from the beginning. Now all  
21 of the sudden I'm being pressured to fill out a voter  
22 registration form each time that I see these people.

23 Q Just one other question for you -- well, sorry, one other  
24 line of questioning for you, Mr. Scott.

25 How do you feel about this case?

1 A Personally, it feel like it's my duty. I don't feel like I  
2 got certain information that was offered to me and should have  
3 been offered to me at the time that I filled out the food stamp.  
4 And, over the last three years, possibly I've been there, in  
5 person, possibly six more times, and I wasn't given the  
6 necessary information that I should have got.

7 Q And why is that important to you?

8 A Again, I live here in the city and the state all my life. I  
9 did my duty as a Vietnam veteran, I also did two years of armed  
10 reserve after this. So I just feel like, as a citizen, to help  
11 out myself.

12 MR. HO: Thank you, Mr. Scott. I don't have any other  
13 questions for you at this time. But the lawyers for the other  
14 parties are going to ask you some questions, and the judge may  
15 ask you some questions, and I may follow-up at the end.

16 THE COURT: Mr. Philips.

17 CROSS EXAMINATION

18 BY MR. PHILIPS:

19 Q Morning, Mr. Scott. My name is Skip Philips. I don't  
20 believe we've had a chance do meet before.

21 A How are you?

22 Q I have some questions about some of the questions and  
23 answers you gave to Mr. Ho, and I will try to be as focused as I  
24 can about not repeating what you've already told us.

25 Is it true, Mr. Scott, that you registered to vote

1 in 2008 when you were living on St. Patrick Street?

2 A I had forms to fill out at that time, but I wasn't sure that  
3 I was registered or not.

4 MR. PHILIPS: Could I ask to see Secretary of State  
5 Exhibit, Your Honor, No. 6, please.

6 BY MR. PHILIPS:

7 Q Let me ask you to take a look at this document, see if you  
8 recognize what that is.

9 A Louisiana voter registration form.

10 Q I'm sorry, say it again?

11 A It's a Louisiana voter registration form.

12 Q Right.

13 And, the right-hand side of block No. 19, is that  
14 your signature?

15 A Yes, it is.

16 Q Is this the application form to register to vote in Orleans  
17 Parish that you signed in 2008?

18 A Yes, it is.

19 Q When you signed this form, I believe you told us it was kind  
20 of in response to a voter registration drive of some kind; is  
21 that right?

22 A Correct.

23 Q It was your expectation after you signed this that it would  
24 be sent off to the Registrar of Voters in Orleans Parish, and  
25 that you would be registered to vote; right?

1 A Yes, sir.

2 Q And what you're telling me is that you just never got a  
3 confirmation of that?

4 A I had no way of knowing whether or not it it had been taken  
5 care of, no, sir.

6 Q I didn't meant to interrupt you, I'm sorry.

7 Did you call the Registrar of Voters Office to  
8 inquire about what your status might be?

9 A At the time, I was homeless and I had no phone. So, no, I  
10 did not.

11 Q And, when you registered, you were living on St. Patrick  
12 Street?

13 A Yes, sir. Staying in a truck.

14 MR. PHILIPS: Your Honor, I know there's been an  
15 instruction about this, but I want to ask the witness a question  
16 about if he attempted to vote while he was living at St. Patrick  
17 Street in 2008. I don't meant to go in to his voting history,  
18 but I think that is relevant.

19 MR. HO: Your ruling on the motion in limine made clear  
20 we cannot get into the history.

21 THE COURT: I think his history is irrelevant, but I  
22 think we've opened the door dealing with his understanding of  
23 the consequences of filling out this application.

24 MR. PHILIPS: And my question, just so counsel --

25 THE COURT: Limit it.

1 MR. HO: Thank you.

2 BY MR. PHILIPS:

3 Q Mr. Scott, after you signed this application, registration  
4 application on August 1, 2008, did you make an attempt to vote  
5 in any election?

6 A I don't think so, no.

7 Q Now, you've testified --

8 MR. PHILIPS: And, Your Honor, I'd offer and  
9 introduce -- I know it's not my exhibit but the witness has  
10 authenticated this. I'd offer, introduce and file into evidence  
11 Secretary of State Exhibit No. 6.

12 THE COURT: Any objection?

13 MR. HO: No, Your Honor.

14 THE COURT: Let it be admitted.

15 (Exhibit admitted.)

16 MR. PHILIPS: Thank you, Your Honor.

17 BY MR. PHILIPS:

18 Q Mr. Scott, you were asked some questions about plaintiff's  
19 Exhibit 146?

20 MR. PHILIPS: And that's the same exhibit as the DCFS  
21 Exhibit No. 5 Your Honor. So I don't know that it matters which  
22 one we pull up. It's a document that you've already seen.

23 So let me see Exhibit 8, please, to DCFS No. 5.

24 THE COURT: And that would be in Mr. Scott's tab 1?

25 MR. PHILIPS: It's his case file, Your Honor. And I'm



1 going to be referring to some of the same documents Mr. Ho  
2 looked at.

3 THE COURT: It's tab 1, if that helps.

4 MR. PHILIPS: That's a better way to do it. Tab 1 in  
5 your folder.

6 BY MR. PHILIPS:

7 Q Now, Mr. Scott, as I understood your testimony -- and here  
8 I'm going to be referring to pages DCFS 9386 to 9401; okay? You  
9 with me?

10 A 9386.

11 Q Good.

12 You testified, I believe, and identified this as  
13 being your application for food stamps that you submitted to the  
14 office here the DCFS here in Orleans Parish on or about  
15 September 1, 2009; correct?

16 A That's correct.

17 Q And you, I believe, also identified your signature on the  
18 first page of the application or the page that's marked DCFS  
19 9386; correct?

20 A Yes, it is.

21 Q Let's skip ahead to 9401, if you would. You with me?

22 A Find it.

23 Q Now, you signed again on this page; correct?

24 A Apparently so, yes.

25 Q Is that your signature?

1 A It is my signature.

2 Q All right.

3 Do you remember being interviewed by a caseworker  
4 for the Department of Children and Family Services when you went  
5 in to make this application?

6 A I do remember that, sir, yes.

7 Q By chance, do you happen to remember who it was that  
8 interviewed you?

9 A No, sir, I don't.

10 Q You see some initials or a signature below yours on that  
11 same page of an agency representative and the same date's  
12 reflected; correct?

13 A Correct.

14 Q Let me go up to the top of this page now, if I could.

15 And, first, Mr. Scott, I don't mean to make this  
16 an improper question, but I need to know if you have the ability  
17 to read and write the English language.

18 A Yes, I do.

19 Q So, when you were going through this form and filling out  
20 the application, you were reading the instructions and  
21 responding based on your understanding of the instructions; is  
22 that right?

23 A No, sir. I did not read this form. And the form that I  
24 actually filled out was a food stamp form.

25 Now, this particular page, I did not fill out. I

1 did sign it, however. Because I was instructed to sign it  
2 because this was part of -- I was instructed at that time that  
3 this was all regarding food stamp. The case workers lined all  
4 these forms up on her desk and indicated the areas that I needed  
5 to sign.

6 Q Did you write the information that's reflected on this form  
7 about your name and your address and your date of birth? Did  
8 you write that on page 9388, for example? Is that your  
9 handwriting?

10 A Yes, that is mine.

11 Q So, as I understand, you're given the form, you sit down and  
12 you fill out the form and you have to complete the form before  
13 you get an interview with the caseworker; true?

14 A For the food stamp form, yes.

15 Q What form are you talking about that's not a food stamps  
16 form, if there is one?

17 A 941 was not in the food stamp form packets.

18 Q You didn't get a form consisting of 14 pages, page 93 --

19 A There was no form that I filled out, sir. I was asked to  
20 sign this form. The representative, the caseworker, indicated  
21 that all these were regarding food stamps, and I needed to sign  
22 all 14 forms. And that's what I did.

23 Q Okay. Let me ask you this then. If you read the rest of  
24 the form and you were filling out information. When you got to  
25 page 14, did you stop reading the form?

1 MR. HO: Objection. That's misstating his testimony,  
2 Your Honor.

3 THE COURT: He is under cross examination; but it is  
4 misstating his testimony. Rephrase it.

5 MR. PHILIPS: I'll try it again.

6 BY MR. PHILIPS:

7 Q Mr. Scott, before you signed DCFS 9401, did you read what  
8 was written on the paper?

9 A No, sir. I did not read that, because it was -- I was  
10 instructed at the time to only fill out the food stamps  
11 application form. This is only regarding the food stamps.  
12 Again, you say voter registration, that wasn't at the time  
13 regarding the food stamps. So I only filled out the food stamps  
14 application form.

15 Now, at the end of this interview, there were --  
16 all these papers were laid out on the desk. I was just  
17 instructed to sign all these papers. I did not read it.

18 Q Okay. So you didn't read -- the page that bears your  
19 signature that starts with voter registration, you're telling  
20 the Court you didn't read that page?

21 A No. I was instructed that was all food stamps application.  
22 So, no, sir. I knew what I'd filled out and I just signed it.

23 Q Well, did anybody tell you you couldn't read this page?

24 A No. The only instruction to sign it.

25 Q So, when the question was asked of you whether if you are

1 not registered to vote where you live now, would you like to  
2 apply to register to vote, you didn't read that question and  
3 know that there was an answer that was solicited from you then?

4 A I didn't know that was the question, no, sir.

5 Q So you didn't refuse to try to register to vote; you just  
6 didn't read the paper?

7 A I didn't get the information, no, sir.

8 Q You remember a conversation with the caseworker in which the  
9 right to apply to register to vote was discussed during your  
10 application process?

11 A Again, sir, we only discussed food stamps.

12 Q So your testimony, just so we're clear, Mr. Scott, your  
13 testimony is that, after you filled out this form and you signed  
14 the form and you were interviewed, there was no discussion about  
15 whether or not you wished to apply to register to vote?

16 A No, sir. If they had, I would have checked the blank.

17 Q And why would you have checked the blank then when you could  
18 have checked the blank had you simply read the form?

19 A I was told it was food stamps application, sir. Again, the  
20 caseworker was there. She laid these forms out on her desk  
21 after she checked all of them. And instructed me to various  
22 areas where I needed to sign my name. This is what I did.  
23 Knowing that I only filled out all the forms that I filled out  
24 was regarding the food stamps, I took her at her word as being  
25 the person in charge and signing where she asked me to sign.

1 Q So there was no discussion in your mind about whether or not  
2 you could or could not register to vote as part of this process?

3 A In my mind? Sir, it had actually happened. You see, there  
4 was no question in my mind that it actually happened. There was  
5 no conversation about voter registration.

6 Q And this is after, some months after you -- or about a year  
7 after you had already signed an application to register in  
8 Orleans Parish based on the voter registration drive; true?

9 A Correct. But I wasn't aware of whether or not I was a  
10 registered voter or not. I had no confirmation to that effect.

11 Q Let's skip ahead a little bit, if we could, Mr. Scott, to  
12 page 9386 in the same tab that we've been looking at.

13 MR. PHILIPS: Again, Judge, that's DCFS 5 and  
14 plaintiff's 146.

15 BY MR. PHILIPS:

16 Q Let's look at 9422, please, Mr. Scott.

17 A Pardon me?

18 Q Page 9422.

19 A Got it.

20 MR. PHILIPS: That's not the right exhibit, folks.

21 I'm looking at DCFS 9422, it's the December 1, '09  
22 application. Plaintiff's 146.

23 BY MR. PHILIPS:

24 Q Mr. Scott, since we're looking at the paper copy anyway I  
25 believe here, and I think everybody has this. This is the

1 document you were telling us a minute ago it that was dated in  
2 either December 1st, '09 or November 1st, '09; is that right?  
3 Kind of unclear about the date; isn't it, at the bottom?

4 THE COURT: Mr. Scott, tab 1, and it's DCFS 9422. They  
5 have, I think, the wrong document on the screen.

6 THE WITNESS: My document has no signature or anything  
7 on it.

8 BY MR. PHILIPS:

9 Q Right. I was asking you, Mr. Scott, if this is the document  
10 that's dated either December 1, '09 or November 1, '09.

11 A Yes, it is.

12 Q You didn't sign on this page; true?

13 A No, sir, I did not.

14 Q Scoot back to page 9407, if you would.

15 You recognize this as a food stamps application  
16 just like the one we talked about a moment ago?

17 A 947, yes, it is.

18 Q Is that your signature on page 9407?

19 A Yes, it is.

20 Q Now let's go ahead back to page 9422 with me, if you will,  
21 and I want to ask you some of the same kinds of questions I  
22 asked you about the document we looked at a minute ago.

23 Did you read this page of the application when you  
24 were in the office in New Orleans on or around December the 1st  
25 of '09?

1 A Sir, this page was not offered to me at the time that I came  
2 there. You only get food stamps forms when you go to the  
3 window. There's no voter registration form attached to that,  
4 there's no staple or anything else. You only get food stamps  
5 application. This was not in the packet. That's why there's no  
6 signature or no check points, it was not there.

7 Q So your testimony is, when you got your food stamps  
8 application, there was no voter registration form with it?

9 A No, sir.

10 Q What about the previous time, same testimony?

11 A I did not get a voter registration form.

12 Q When did you get -- I'm sorry. When did you get the voter  
13 registration form the previous time you went, the one you  
14 signed, when was that --

15 A That was the last time that I signed, which was  
16 approximately 0-11 of -- I mean, December 0-11. That was the  
17 last time that I applied and that was last time -- that was the  
18 first time that I recall getting a voter registration form.

19 Q And so would it be correct that your testimony is that you  
20 didn't read this form and you didn't sign this form when you  
21 went back to the food stamps office later in 2009?

22 A No, sir. That would not be correct. I didn't get a form.

23 Q And you never saw this form when you were there?

24 A Correct. There's no signature, nothing checked.

25 Q Were you, Mr. Scott, interviewed by a caseworker when you



1 went back to the food stamp office in December of '09?

2 A Good question. I have gone there approximately five to six  
3 times. I saw my caseworker exactly once.

4 Q So your testimony is that -- well, first of all, tell me on  
5 which occasion then did you see your caseworker? What time that  
6 you went in?

7 A The first time that I went there.

8 Q Is that the document we looked at --

9 A That was the only time I saw my caseworker.

10 Q Let's not talk over each other, Mr. Scott, because, sorry, I  
11 just didn't catch your answer.

12 Would it be your testimony that the only time you  
13 were interviewed by a caseworker at the Orleans Parish DCFS was  
14 on September 1, 2009 when you went in to apply for food stamps?

15 A Correct.

16 Q And so, any subsequent trip you made, and I think you said  
17 five or six trips, any subsequent trip you made was you filled  
18 out the application, left it, and you were not interviewed by a  
19 case worker?

20 A Correct.

21 Q No people at all, whether it was your assigned caseworker or  
22 not?

23 A No, sir.

24 MR. HO: Objection, Your Honor. I don't know if he  
25 knows who his assigned caseworker is.

1 BY MR. PHILIPS:

2 Q You never saw again the person who interviewed you when you  
3 went in in September of '09; is that right?

4 A No, sir.

5 Q Now let's scoot head --

6 THE COURT: Wait. I just want to make sure I  
7 understand. When you say no, sir, you never saw her, the  
8 caseworker?

9 THE WITNESS: The caseworker, I may have seen her in  
10 the office. I never signed in her presence.

11 BY MR. PHILIPS:

12 Q Just to follow-up on that, you weren't interviewed by anyone  
13 else on the trips you made to the office?

14 A Those are, when you get an application for food stamps, you  
15 fill it out there, return it there, and then you have no way to  
16 actually see no one. The clerk, the person at the windows,  
17 takes your paperwork and tells you you're done.

18 Q And then scoot head with me, if you would, to page 9424 in  
19 the same tab in your binder, if you would, Mr. Scott.

20 A The 9424?

21 Q 9424, please.

22 A Got it.

23 Q You've talked about this form already with Mr. Ho. But, as  
24 I understand it, the reason you submitted this form was not  
25 because you'd changed your address; is that right?

1 A Yes, sir, that would be correct.

2 Q What do you remember the reason was that you had to submit  
3 9424 to the DCFS office?

4 A If you'd turn back to I believe the -- what tab is that?  
5 Anyway, it had the wrong address on the initial food stamps  
6 application. I did not receive the stamps.

7 I called down to the office, and they told me that  
8 they had the wrong address, and that the paperwork -- I mean,  
9 that the papers had come back to them. And I needed to come  
10 back down to change and get a change of address form.

11 Q What was wrong were the address?

12 A It was the wrong address. They mailed it to the wrong  
13 place.

14 Q It's true that on the initial application you put 1303  
15 Gravier, and the real address was 1803?

16 A 1803, correct.

17 Q So that was the reason you had to go back in; correct?

18 A Correct.

19 Q When you went back in and submitted this form, I take it  
20 from your prior testimony that it's true, you were not  
21 interviewed by anybody, any caseworker or anybody else at DCFS;  
22 right?

23 A Just the clerk at the office window where you pick up your  
24 forms.

25 Q The two times you went to the DCFS office and you filled out

1 applications for food stamps, and the two times we've talked  
2 about where there was a voter registration/voter preference form  
3 that we've looked at, is it your testimony that you never  
4 declined the opportunity to register to vote?

5 A First two times --

6 MR. HO: Objection, Your Honor. We had the same issue  
7 when I was asking this question.

8 MR. PHILIPS: I'll rephrase the question.

9 THE COURT: Rephrase the question. That's calling for  
10 a legal conclusion.

11 MR. PHILIPS: Counsel's point is well taken.

12 BY MR. PHILIPS:

13 Q Mr. Scott, let's start with the December 1, 2009 SNAP  
14 program. If you want to look at the page --

15 A No, no. I understand what you're saying.

16 Q It's 9401.

17 You didn't check a block yes or know when it came  
18 time to answer the question about do you want to register to  
19 vote; right?

20 A No, sir, I did not.

21 Q And, on the second time, the second visit in December of  
22 '09, same thing, you didn't check yes or no, one way or the  
23 other; did you?

24 A Sir, they wasn't there. I am keep telling you, when you go  
25 to the food stamps, this voter registration form was not in the

1 packet. All you get are the food stamps application. Not a  
2 voter registration form. All the time I've been there, five or  
3 six times, the last time which was 11 of 0 -- December 0-11 was  
4 the last time I actually got a form with my food stamps  
5 application. And, at that time, I check no, because of the fact  
6 that we were already in litigation regarding the situation.

7 Q Well, if you would you --

8 MR. PHILIPS: Now I'm going to be here, Your Honor,  
9 referring to DCFS Exhibit No. 7, Exhibit A. 7, Exhibit A. It's  
10 the 2011 application that Mr. Scott has talked about previously.  
11 BY MR. PHILIPS:

12 Q You don't have this one in your binder, Mr. Scott, so we're  
13 above going to look at the screen.

14 THE COURT: Wait. This is DCFS 7?

15 MR. PHILIPS: It's Exhibit A to DCFS 7, Your Honor.

16 THE COURT: Thank you.

17 MR. PHILIPS: I'm not going to offer the exhibit, but I  
18 think this attachment is relevant.

19 BY MR. PHILIPS:

20 Q Mr. Scott, you with me on this one? You recognize this  
21 paper?

22 A Yes, I do.

23 Q Is that your signature on the page?

24 A Yes, it is.

25 Q Do you recall that this is an application for food stamps

1 that you made in 2011?

2 And we can scoot back to some pages later on to  
3 show you the date. How about that?

4 Let's go to page 13, please.

5 See that page there, Mr. Scott?

6 A Yes.

7 Q That's your signature as well?

8 A Yes, it is.

9 Q I'm sorry?

10 A Yes, it is.

11 Q Thank you.

12 Dated December 19, 2011. True?

13 A Correct.

14 Q Now, between December of 2009 and this application, had you  
15 made application to the food stamp people here in Orleans  
16 Parish?

17 A Give me the dates again, please, sir? Between what dates?

18 Q The December 2009 document we looked at and this, December  
19 of 11, did you have to submit any other applications to the food  
20 stamp office?

21 A Did I have to --

22 Q To continue your benefits?

23 A Yes, I did.

24 Q And then did you do that?

25 A Yes, I did.

1 Q Did you do that in-person at the office?

2 A Yes. Every six months, I go in to renew.

3 Q When you got here to December of 2011, at the top of this  
4 page, it appears that the block No is checked. True?

5 A Yes, sir.

6 Q Did you check that block no?

7 A Yes, sir, I did.

8 Q And I believe you said that your decision to check the block  
9 no had something to do with this litigation?

10 A Well, not something to do with it. We are already in  
11 litigation as far as not receiving this form of voter  
12 registration information. So it was my decision at the time to  
13 check no because we were already having a problem -- we already  
14 in litigation regarding this. So at that time I did not want to  
15 fill out a voter registration form.

16 Q At that time, did you believe still that you were not  
17 registered to vote in Orleans Parish based on your 2008  
18 application?

19 A Correct.

20 Q Or, at least, it had not been confirmed to you that you were  
21 registered to vote?

22 A Correct.

23 Q And so you had elected at this point, based on your  
24 understanding that you were a litigant, that you were not  
25 registered to vote?

1 A Not at that time.

2 Q And have you since registered to vote?

3 A Yes, sir, I have. And I have received confirmation that my  
4 paperwork was received.

5 MR. PHILIPS: Your Honor, if I could have just 30  
6 seconds, please.

7 THE COURT: Sure.

8 (Pause in Proceedings.)

9 MR. PHILIPS: I'm told I don't have any other  
10 questions.

11 Thank you, Mr. Scott. I appreciate your  
12 cooperation, sir.

13 Exhibit -- two exhibits. I think 5 is already in.  
14 Exhibit A to DCFS 7, but not the underlying document.

15 THE COURT: That's the --

16 MR. HO: So 7 is a declaration with the benefits  
17 application attached. If you want to remove the application.

18 MR. PHILIPS: That's it. Just the application.

19 THE COURT: Let it be admitted.

20 (Exhibit admitted.)

21 MR. HO: With respect to 5, I think the declaration is  
22 5.

23 MR. PHILIPS: Five is the case file.

24 THE COURT: Why don't you guys talk about it and then  
25 make an offer.



1 MR. PHILIPS: We'll straighten it out.

2 THE COURT: I want to make sure we offer the correct  
3 thing, and we'll wait a minute and let you do that.

4 (Pause in proceedings.)

5 MR. PHILIPS: Thank you, Your Honor.

6 THE COURT: Wait. Do we have the exhibits offered and  
7 accepted?

8 MR. PHILIPS: I would offer them if I have not already,  
9 Your Honor. SOS 6, which I think is admitted.

10 THE COURT: Okay.

11 MR. PHILIPS: Exhibit A to DCFS 7.

12 THE COURT: Which is just the --

13 MR. PHILIPS: Just the application.

14 THE COURT: Let that be admitted.

15 (Exhibit admitted.)

16 MR. PHILIPS: And DCFS 5 is Mr. Scott's case file,  
17 which I believe is the same exhibit as plaintiff's 146.

18 THE COURT: All right. Those are all admitted. Thank  
19 you.

20 (Exhibit admitted.)

21 MR. PHILIPS: Thank you, Your Honor.

22 I tender the witness.

23 THE COURT: Mr. Jones.

24 CROSS EXAMINATION

25 BY MR. JONES:

1 Q How you doing, Mr. Scott?

2 A How are you, sir?

3 Q Can you read from that screen in front of you okay if I use  
4 computer documents instead of paper documents?

5 A Yes, sir, I can.

6 MR. JONES: Judge, initially, I would like to look at  
7 SOS 6.

8 BY MR. JONES:

9 Q Now, Mr. Scott, do you know what that document is that  
10 appears as SOS 6 --

11 A Yes. It's the Louisiana Voter Registration Form.

12 Q Let go ahead and finish.

13 That's now on the screen in front of you, do you  
14 recognize that document?

15 A Yes.

16 Q And you've identified it as a voter registration form for  
17 Louisiana; is that correct?

18 A Yes, sir.

19 Q Does that document bear your signature at the bottom right?

20 A Yes, sir, it does.

21 Q To the left of your signature, does it bear the date  
22 5/23/08?

23 A Yes, sir.

24 Q How did that document come to be prepared?

25 A Again, there were a group of people on the streets in the

1 area of St. Patrick where I live. As I was coming out of the  
2 one of the buildings, a grocery store -- I'm not sure the exact  
3 address where they were -- they actually filled these forms out  
4 for you, and all you did was sign it.

5 Q And was it your intention and expectation that this document  
6 would be filed, and you would become a registered voter?

7 A Correct.

8 Q After you prepared, signed that form, did you follow-up to  
9 determine whether you had indeed become a registered voter?

10 A No, sir. I had no form at the time, and I was living in my  
11 vehicle. So, actually, I did not receive anything stating that  
12 I was a registered voter.

13 Q What is the address provided on that form?

14 A 510 St. Patrick Street, New Orleans, Louisiana.

15 Q I'm sorry?

16 A New Orleans, Louisiana.

17 Q Who gave that address as your address?

18 A I did.

19 Q All right.

20 Let me scroll down on that document. This is  
21 still SOS 6. Let me ask you to take a look now at the document  
22 on the screen in front of you.

23 Do you recognize that document?

24 A Yes, sir, I do.

25 Q And you have testified that that is another voter

1 registration form that you completed on August 1, 2008; is that  
2 correct?

3 A Yes.

4 Q When you filled out that document, did you become curious as  
5 to whether you had become a registered voter as a result of the  
6 application you filled out just a few months before?

7 A Again, I received no information, so that was the reason for  
8 doing it again. I had no way of knowing. At the time, I had no  
9 phone, and I hadn't received anything in the mail. So these  
10 were the reason for redoing it again.

11 Q Do you have a phone now?

12 A Yes, sir, I do.

13 Q You have a cellphone?

14 A Yes, sir.

15 Q When did you get that cellphone?

16 A After starting receiving food stamps.

17 Q When did you start receiving food stamps?

18 A '09. They made you eligible to receive food stamps -- I  
19 mean, a phone, if you are on food stamps application.

20 Q And that phone would have been enabled you to call the  
21 Registrar of Voters to see if you were a registered voter; is  
22 that right?

23 A Yes, sir.

24 Q Did you do that?

25 A Not in '09, no, sir.

1 Q Did you do that before this lawsuit was filed in April of  
2 2011?

3 A No, sir.

4 Q Did you want to register to vote?

5 A Sir, obviously I wanted to register, I've gotten two forms  
6 with my name on it.

7 Q Did you want to vote?

8 A Yes, sir.

9 Q But it's your testimony that you didn't check to see whether  
10 you were entitled to vote?

11 A I didn't receive --

12 Q Prior to the filing of this lawsuit; is that true?

13 A Right.

14 Q Now, at some point after this lawsuit was filed, did one of  
15 your lawyers show you a voter registration application?

16 A Yes.

17 Q Do you recall when that occurred?

18 A I'm sorry?

19 Q Do you recall when that happened?

20 A When it happened? It was -- no. Not exactly.

21 Q Was it after the lawsuit was filed?

22 A Yes. I would have to say so.

23 Q Did you understand how your lawyer came to have that form?

24 A He instructed me that it was given to him by the state, on  
25 behalf of the state.

1 Q By one of the lawyers in this case on behalf of the state?

2 A Correct.

3 Q And did you complete that form in order to register to vote?

4 A Not at that time, no, sir.

5 Q Were there any later times that you were asked to fill out  
6 an application to register to vote?

7 A Yes, sir.

8 Q Was one of those times on May 10, 2012?

9 A Yes, it was. I believe so.

10 Q That was during your deposition?

11 A Correct.

12 Q And did you decline at that time to complete the voter  
13 registration form?

14 MR. HO: Your Honor, that language of decline, I think  
15 we've agreed, is a legal term. He's asking the witness for --

16 THE COURT: Sustained.

17 MR. JONES: I think it's clear, but I'll --

18 BY MR. JONES:

19 Q Did you complete the voter registration form that you were  
20 offered on May 10, 2012?

21 A Not at that time.

22 Q Have you filled it out up to today?

23 A Yes. And I've already received confirmation that my  
24 paperwork was had been received.

25 Q And when did you fill out that form?

1 A Approximately two weeks ago.

2 Q Had you become aware at that point that you were already a  
3 registered voter?

4 A No. I was not aware at that point.

5 Q I'm sorry?

6 A At that time? You mean, since I filled it out?

7 Q Well, after May 10, 2012, when your deposition was taken,  
8 were you aware that you were a registered voter?

9 MR. HO: I'm going to object. Assuming facts not in  
10 evidence, Your Honor. It's not clear that he was a registered  
11 voter, he wasn't living at the address that these voter  
12 registration cards are, and I think there's a legal  
13 determination to be made on that.

14 THE COURT: It is a legal determination. I think  
15 perhaps the better question is, was he aware that he was on the  
16 rolls.

17 MR. JONES: I'll a call a witness to clear it up.

18 BY MR. JONES:

19 Q Were you offered a registration form again here at the  
20 courthouse on July 31st, 2012?

21 A Yes, I was.

22 Q Did you complete that form?

23 A Yes, I did.

24 Q What did you do with that form?

25 A I took it home, and it's on my dresser. But I did complete

1 it. I just hadn't mailed it in.

2 Q So it's never been sent to a registrar or any other official  
3 who might be involved in voter registration?

4 A Yes. It has been taken care of now.

5 Q I'm referring to the second form, the one in your dresser,  
6 that's not been sent to anybody; is that true?

7 A My attorney, Mr. Ho and I, he brought me -- I requested one  
8 from him --

9 Q No, no. It's against the rules to talk about any discussion  
10 between you and your attorney. The judge may want to tell you  
11 about privilege.

12 THE COURT: Mr. Scott, any conversations you had with  
13 Mr. Ho or anyone on the team of attorneys that represent you are  
14 confidential conversations, and you should not reveal those in  
15 the courtroom. You can tell what you did regarding your  
16 registration.

17 THE WITNESS: I just did. I filled it out, it's  
18 sitting on my dresser.

19 MR. JONES: Okay. I just wanted to clarify that to be  
20 sure.

21 Thank you, Mr. Scott. That's all I have.

22 If we could pull down that exhibit, unless Mr. Ho  
23 needs it.

24 MR. HO: I'm sorry?

25 MR. JONES: This has been offered; is that correct?



1 MR. HO: Just a few moments.

2 (Pause in proceedings.)

3 MR. HO: Thank you, Your Honor.

4 REDIRECT EXAMINATION

5 BY MR. HO:

6 Q Mr. Scott, I want to ask you a little bit about when you are  
7 living at St. Patrick Street. What was that housing situation  
8 like?

9 A Actually, it was a mobile trailer. And the house was -- I'd  
10 say the building with the address on it was a building that I  
11 happened to be working in, and staying in a trailer next door to  
12 it.

13 Q Was it the building itself inhabited?

14 A At the time, we were renovating.

15 Q And how long did you stay in that trailer at St. Patrick  
16 Street?

17 A Approximately eight months.

18 Q And, after you stopped living there, what did you do?

19 A At that time, I lived in my vehicle for a week or two. And  
20 then, from that point, I went to I believe it was North Derbigny  
21 or South Derbigny.

22 Q Mr. Philips asked you some questions, and I believe Mr.  
23 Jones did, too, about checking your voter registration status.

24 Did you check your voter registration status while  
25 you were living in your vehicle?

1 A No, I did not.

2 Q Why not?

3 A At the time, it was a little bit stressful. I'm living and  
4 sleeping out of my car. So there were other factors in my life  
5 rather than to check on a voter registration form.

6 Q Was that the only time that you've been living in your  
7 vehicle?

8 A Yes.

9 Q I want to go back and ask you about your benefits  
10 applications. Let me ask you about your first application in  
11 September 2009.

12 How long did you speak with your caseworker at  
13 that day?

14 A Five, maybe ten minutes.

15 Q Did you understand that day that you could register to vote  
16 at the food stamps office?

17 A No, I did not.

18 Q Do you remember if, at the end of your application process,  
19 you had a conversation about voter registration?

20 A No, sir, I didn't.

21 Q Let me ask you about your second trip to the food stamps  
22 office in December of 2009.

23 How long were you at the office that day?

24 A Hour, hour and a half.

25 Q How long were you speaking to an employee of that office,

1 would you say?

2 A Roughly five minutes.

3 Q Did you understand that day that you could register to vote  
4 at the food stamps office?

5 A No.

6 Q Do you remember getting a voter registration form that day?

7 A No, I did not.

8 Q Anyone during that five minutes of conversation offer to  
9 assist you with the voter registration form? And, again, I'm  
10 talking about December of 2009.

11 A No.

12 Q Third benefits application -- or, sorry -- the benefits  
13 paperwork that we showed you today from November of 2010, how  
14 long were you in the office that day?

15 A Again, it varied. Hour, hour and a half, two hours.

16 Q How long were you actually speaking to an employee of that  
17 office during that day?

18 A Three to five minutes.

19 Q And did you understand that day that you could register to  
20 vote at that office?

21 A No.

22 Q During that three to five minute conversation, did anyone  
23 offer to assist you to register to vote?

24 A No, they did not.

25 Q And do you remember getting a voter registration form that

1 day?

2 A No, I did not.

3 MR. HO: If I could just have one moment.

4 (Pause in proceedings.)

5 MR. HO: Those are all the questions that I have for  
6 you today, Mr. Scott. Thank you very much for your time.

7 MR. JONES: If I may, I would like to request an offer  
8 of proof in connection with this witness's testimony.

9 That offer of proof would be exhibit SOS 7, the  
10 second page titled Voter Registration History. Your Honor has  
11 ruled is not admissible.

12 THE COURT: You want to just, as an offer of proof,  
13 that's fine.

14 MR. JONES: Right.

15 And, second, I would like to offer SOS 10 as an  
16 offer of proof, pages 27 --

17 THE COURT: Are those subject to all of the motions in  
18 limine?

19 MR. JONES: The first one was directly in the motion in  
20 limine.

21 The second involves, again, a request about  
22 whether he voted or attempted to vote after May 2008. And, as I  
23 understand it, Your Honor has ruled that that's a very limited  
24 subject matter. So I wanted to present an offer of proof on  
25 that.

1           The second item in the offer of proof is SOS 10,  
2       which is the witness's deposition from May 10, 2012. It's pages  
3       27, line 24, through page 29, line 15. And page 38, line 18,  
4       through page 39, line 10. And, again, that's offered to show  
5       that Mr. Scott has not voted or attempted to vote since May  
6       2008.

7           MR. HO: I think there's been a lot of testimony on  
8       that, Your Honor.

9           THE COURT: It's a proffer. I am a going to allow him  
10      to proffer it for another court to consider. Because I've  
11      indicated what I would consider it for and what I would not  
12      consider it for.

13           I have a couple of questions for Mr. Scott.

14           Mr. Scott, first thing, when you were in Vietnam,  
15      sir?

16           THE WITNESS: '69 through '71. '69 through '71.

17           THE COURT: Let me first thank you for your service. I  
18      I appreciate your service to your country.

19           I do want to talk to you, sir, about when you  
20      lived on St. Patrick Street. And, as I appreciate it, you were  
21      there because you were working on an uninhabited house, but you  
22      were living in your car, or was it a motor trailer?

23           THE WITNESS: I was living in my car at the time, but I  
24      had an offer about me having background in carpentry, to live at  
25      this particular place while I did the work.

1 THE COURT: And you were there for about eight months?

2 THE WITNESS: Correct.

3 THE COURT: Did you receive mail at St. Patrick Street?

4 THE WITNESS: Yes, I did.

5 THE COURT: And it's your testimony you never received  
6 confirmation from the voter registration?

7 THE WITNESS: No, I did not.

8 THE COURT: Describe for me, sir -- we talked about  
9 your first time you completed an application to register to  
10 vote. That was one of those voter registration drives?

11 THE WITNESS: Yes.

12 THE COURT: Can you tell me, were there people at a  
13 table outside, or can you describe for me exactly what occurred?

14 THE WITNESS: Yes. It was in front of a normal  
15 building, I believe it was like a grocery store or somewhere,  
16 and there was a table sitting on the outside of the building.

17 THE COURT: Okay. Were there multiple people at the  
18 table working the drive?

19 THE WITNESS: Yes. At that time I think it must have  
20 been at least two.

21 THE COURT: And, when you walked out of the grocery  
22 story, did they --

23 THE WITNESS: They questioned me whether or not you  
24 were registered or wanted to register. And, I wasn't sure, so I  
25 -- they'd asked me if I wanted to register, and I -- at that

1 time, I had forgotten. I told them yes. And, they filled the  
2 form out for me, and all I had to do was sign it.

3 THE COURT: And you signed it.

4 Did you understand that you would receive some  
5 sort of confirmation?

6 THE WITNESS: They told me I would, but I never did.

7 THE COURT: Okay.

8 Three months later, we've just seen evidence that  
9 you applied to register again.

10 THE WITNESS: I wasn't sure, and it was a different  
11 area in another area.

12 THE COURT: Tell me about that circumstance, if you  
13 recall.

14 THE WITNESS: I was doing mechanic work, so I was at an  
15 auto parts place at the time. And these people happened to be  
16 outside of the place. And, again, it was actually they asked me  
17 if I was registered to vote. And I told them I wasn't sure. I  
18 told them that I had done the paperwork some months before but I  
19 wasn't sure. They said: Well, you can do it again.

20 THE COURT: So you did it out again?

21 THE WITNESS: Correct.

22 THE COURT: All right.

23 Did you fill out that second form?

24 THE WITNESS: I filled out the second form myself, yes.

25 THE COURT: And you signed it.

1 THE WITNESS: Yes.

2 THE COURT: Did you ever hear anything after that to  
3 confirm that you were in fact registered?

4 THE WITNESS: No, I did not.

5 THE COURT: Do you know who was sponsoring the voter  
6 registration drive?

7 THE WITNESS: No. I do not. I don't care to  
8 speculate, I have no idea.

9 THE COURT: Were there other people signing cards --

10 THE WITNESS: Yes. There were several people, other  
11 people, there in line to register.

12 THE COURT: Thank you, sir.

13 All right. Are there any questions solely related  
14 to the questions that I just asked?

15 MR. HO: None from us, Your Honor.

16 MR. PHILIPS: We have none, Your Honor.

17 THE COURT: Thank you.

18 We're going to take a 15 minute recess. Court's  
19 at recess for 15 minutes.

20 You may step down, Mr. Scott.

21 (Proceedings in recess.)

22 THE COURT: Mr. Ho.

23 MR. HO: Thank you, Your Honor. Our next witness, the  
24 plaintiffs call Ernest Johnson.

25 ERNEST JOHNSON, being duly sworn, testified as



1 follows:

2 THE COURT: Mr. Johnson, would you please state your  
3 name and spell it for the court reporter, please.

4 THE WITNESS: Yes. Ernest Johnson, E-R-N-E-S-T  
5 J-O-H-N-S-O-N.

6 DIRECT EXAMINATION

7 BY MR. HO:

8 Q Morning, Dr. Johnson.

9 A Good morning.

10 Q How are you today?

11 A Great.

12 Q You're here to testify on behalf of the Louisiana State  
13 Conference of the NAACP today; is that right?

14 A Correct.

15 Q And I'll refer to that as the Louisiana NAACP, and will you  
16 understand me if I do that?

17 A Yes.

18 Q How old are you, Dr. Johnson?

19 A Too old to say. I'm 62.

20 Q And what do you do for a living?

21 A Attorney by profession.

22 Q How long have you been a lawyer?

23 A Since 1976.

24 Q Where did you go to law school?

25 A Southern University.

1 Q And where do you live?

2 A In Baton Rouge.

3 Q How long have you been living there?

4 A Since 1973.

5 Q And do you have a role in the Louisiana NAACP?

6 A Yes, I do.

7 Q And what is that role?

8 A I am president of the Louisiana NAACP.

9 Q And how long have you --

10 MS. CANGELOSI: Your Honor, I object for the record for  
11 using shortened names because there is some issue as to what the  
12 name of the organization is. So, if they're calling it the  
13 Louisiana State Conference, I think we need to ask the questions  
14 based on that, because I have some questions on other names as  
15 well.

16 THE COURT: I think he's established that that's what  
17 he -- you want, every time they mention it, to be Louisiana  
18 Conference of the NAACP?

19 MS. CANGELOSI: Yes, ma'am. If that's the name of the  
20 organization --

21 THE COURT: I understand.

22 Why don't we call it the Louisiana Conference.

23 MR. HO: Okay.

24 THE WITNESS: I think we have to put the NAACP in it.

25 THE COURT: Yeah, but we'll know that.

1 BY MR. HO:

2 Q So I'm going to ask you some questions today, Dr. Johnson,  
3 and I'm going to call it the Louisiana State Conference of the  
4 NAACP the Louisiana conference. Is that all right?

5 A Well --

6 Q I'll call it the Louisiana State Conference of NAACP. That  
7 will make everyone happy. How about that?

8 A I think it's very important that we keep the NAACP in it.

9 Q I agree with you. I understand.

10 THE COURT: We weren't taking it out.

11 BY MR. HO:

12 Q How long have you been the president of the Louisiana State  
13 Conference of the NAACP?

14 A Since 1995.

15 Q And, before that, did you have any role with the Louisiana  
16 State Conference of the NAACP?

17 A Yes. Before that, I served as the first vice president of  
18 the Louisiana NAACP.

19 And, before that, I was general counsel.

20 Q And, roughly, what were the years that you held those roles?

21 A I started -- my involvement started with the NAACP under Ms.  
22 Rupert Richardson in 1983. I came in as a young attorney,  
23 volunteering time and services to assist the NAACP out, and got  
24 locked into the NAACP. And that's the story.

25 Q You said locked in. What did you mean by that?

1 A Well, you find, in certain areas of life, that there are  
2 certain things that you get committed to. There's not any  
3 financial reward in it, it's just reward to try to get people to  
4 help themselves. And Ms. Richardson was very inspirational to  
5 me to be involved to try to assist those persons throughout the  
6 state of Louisiana who we saw in the fight for freedom and  
7 needed some help. And I just got locked in to the role and been  
8 here ever since.

9 Q Could you tell us about some of your responsibilities as  
10 president.

11 A As president of the Louisiana NAACP, in between meetings of  
12 the NAACP state conference, I am the authority for the  
13 organization. I conduct the meetings of the NAACP. I appoint  
14 all of the standing committee chairs and special committee  
15 appointments. And I perform the duties as outlined by the  
16 bylaws of the NAACP.

17 Q Do you directly manage other people who have duties with the  
18 NAACP -- the Louisiana State Conference of the NAACP?

19 A No. We do not have a paid executive director. As president  
20 of the organization and sitting at the committee level,  
21 executive committee meeting level, we basically address the  
22 policy in terms of resolutions that are passed by the  
23 organization and carry out those resolutions.

24 Q When you say address the policy, what do you mean by that?

25 A What my definition of policy is, when we pass resolutions or

1 making sure that the bylaws are complied with in terms of  
2 oversight, that's my definition of policy. Not day-to-day  
3 management. We do not have anyone who handles day-to-day  
4 management of the organization.

5 Q And you don't?

6 A No, I don't.

7 Q Tell me just a little bit about the purpose of the Louisiana  
8 State Conference of the NAACP.

9 A The Louisiana NAACP is basically a part of the national  
10 NAACP. We have what some people would refer to as chapters, we  
11 call them branches. We have adult branches, we have college  
12 chapters, youth councils throughout the country, including in  
13 Louisiana.

14 And the Louisiana -- the state conferences of  
15 NAACP is more of a coordinating unit for all of the units that  
16 would be located within the particular state. And so all of the  
17 units, what I'm calling units, would be the adult branches,  
18 college chapters, youth councils in Louisiana.

19 THE COURT: I just want to make sure I understand,  
20 Dr. Johnson. Are all of the branches underneath the conference,  
21 is that what you're telling us? If you could just describe --  
22 maybe I missed something, I'm not sure.

23 THE WITNESS: What happens is, if there's a local area  
24 that would like to organize a NAACP unit, they will file an  
25 application for a charter request to the national NAACP office.

1 Once that charter is issued, according to the NAACP bylaws, the  
2 units within a particular state come under for oversight and  
3 coordinating activities. So we don't have NAACP units doing one  
4 thing here and one thing there, we all operate within the state  
5 conferences. And so as the coordinating unit of all of the  
6 units within the state.

7 THE COURT: Thank you.

8 BY MR. HO:

9 Q And I'll ask you a few more questions about the organization  
10 in a minute. But I just wanted to ask you about the goals of  
11 the Louisiana NAACP.

12 When I said Louisiana State Conference of the  
13 NAACP, when I asked earlier about its purpose, I want to know  
14 what some of the goals of the organization are.

15 A The goals of the Louisiana NAACP, or any other NAACP unit,  
16 is the goals -- are the goals of the national organization. And  
17 the mission was set out in 1909 when the NAACP was created, and  
18 that was to fight against racial discrimination, which results  
19 in eliminating racial discrimination and racial prejudice. And  
20 the areas that we focus on is in the area of education,  
21 political, social and economic.

22 Q How do you go about accomplishing those goals?

23 A The goals are accomplished through what we call direct  
24 action. Direct action can take a lot of different forms.

25 It can be legislative, where we seek to get

1 legislation changed to help eliminate disparities that may  
2 exist.

3 And, primarily, I want to say that the NAACP, when  
4 it was started, primary was for African Americans, protection of  
5 Africans Americans. Over the years, it has evolved into  
6 African-Americans, other minorities, including women. But it  
7 was actually -- the original mission of the organization was to  
8 fight against disparities in those four areas for Africans  
9 Americans.

10 Now, how do we accomplish our goals? I mentioned  
11 legislative.

12 In the courts. We're here in the court today. We  
13 were in court in Brown vs. Board of Education. When I say we,  
14 it was the NAACP. Even though we have different units, the  
15 NAACP is the NAACP.

16 And we protest. We march. We strike. We  
17 boycott. We put up picket signs. But those are some of the  
18 more drastic direct action steps.

19 What we try to do is to negotiate, we try to pass  
20 legislation, we try to go through the court.

21 But then, sometimes, when all else fail, then the  
22 other methods of direct action would be used --

23 MS. CANGELOSI: Your Honor, I'd object to the narrative  
24 response. I forgot what the question was.

25 MR. HO: I can follow up with him. We can move on.

1 THE COURT: I think we need to follow up.

2 BY MR. HO:

3 Q Instead of asking you generally, let me ask you one more  
4 basic question before we move on.

5 Since you've been president, Dr. Johnson, what are  
6 some of the most, in your view, significant accomplishments of  
7 the organization.

8 A Since I've been president, our march against Mike Foster in  
9 1996 where we marched over 35,000 people in support of  
10 affirmative action.

11 We coordinated the Jena 6 march a few years back  
12 where over 100,000 people went to Jena, Louisiana to protest six  
13 African-American high school students who were in jail with bail  
14 over \$100,000 for what amounted to no more than a high school  
15 fight, you know.

16 So, since I have a been in the organization, even  
17 though I'm a lawyer by profession, I've liked to put on my  
18 tennis shoes and get out and march and protest. I believe  
19 that's the American way.

20 Q Does the Louisiana Conference of NAACP have any officers  
21 other than yourself.

22 A Yes, we do.

23 Q Who are some of those officers?

24 A You mean, individual names or --

25 Q Types.



1 A Positions?

2 Q Positions.

3 A First vice president, district vice president,  
4 secretary-treasurer, we have two members elected at large.  
5 Those are the elected members of the state organization. Of  
6 course, we have the appointed standing committee chairs also.

7 Q Do you know a man named Reverend Edward Taylor?

8 A Yes, I do.

9 Q And who is he?

10 A Reverend Taylor a friend, and also he is a member of the  
11 Louisiana State Conference Executive Committee. He's chairman  
12 of the Religious Affairs Committee. And I appoint him to  
13 special committees from time to time.

14 Q Does he have any other official responsibilities other than  
15 religious affairs?

16 A Not at this time.

17 Q Does he have any other responsibilities -- we'd talk about  
18 special projects a moment ago. What are some examples of those?

19 A When Katrina hit Louisiana, we received funding from the  
20 national NAACP to create an advocacy center. Reverend Taylor  
21 was appointed as the director of the Louisiana NAACP Advocacy  
22 Center, which provided assistance to individuals who had been  
23 displaced and affected by Hurricane Katrina and Rita. And so he  
24 was the director of the advocacy center.

25 And, over the years, since I've been president,

1 we've gotten funds from the national office from time to time to  
2 conduct voter registration and voter participation activities.

3 And, whenever we get those opportunities, I've appointed  
4 Reverend Taylor as the person in charge of those activities.

5 Q Let me just ask about voter registration. When you have  
6 appointed him to be in charge of those activities, was that an  
7 official -- was that is an an official officer? Did he have an  
8 official office of the Louisiana State Conference of NAACP  
9 related to that?

10 A It was an official position. Now, you know, with  
11 definitions, we always need to know what definition we talking  
12 about. My definition of an officer is as set out in the bylaws  
13 as set out as officers. But also the president has authority to  
14 appoint individuals to certain positions. So, was he an officer  
15 according to the bylaws? No. Was he an officer in an official  
16 position with the Louisiana NAACP? Yes.

17 Q You started to tell us earlier about the organizational  
18 structure of the Louisiana State Conference of the NAACP. Can  
19 individual people be members of the Louisiana State Conference  
20 of the NAACP?

21 A No. Individuals cannot directly be a member of the  
22 Louisiana NAACP.

23 Q But can individual people do work on behalf of the Louisiana  
24 State Conference of the NAACP?

25 A I would think so. I'm an individual, and I'm elected as the

1 president of the Louisiana NAACP.

2 And, if I may, the way the organization is set up,  
3 the membership of the state conference would be all of the units  
4 within the state. And, in order for members to be part of the  
5 state, you'd have to be a member of the local unit. So, to that  
6 extent, we are members of the Louisiana NAACP through our local  
7 units.

8 And, in addition to that, the state conference  
9 receives 15 percent of all the membership dues. So, whenever  
10 the membership dues are paid within the state of Louisiana, 15  
11 percent of that membership dues comes to the state NAACP.

12 Q So that's one of your funding sources. Do you have any  
13 other funding sources?

14 A Well, the special monies that come down for various  
15 projects, like voter registration or to Get Out To Vote.

16 The other method by which we raise funds would be  
17 our annual conventions that we conduct on an annual basis. That  
18 is our primary source of generating funds for the activities  
19 that we're doing. And, of course, to conduct the conventions,  
20 activity at the conventions.

21 THE COURT: Where does the special funding come from?  
22 Is that from the national?

23 THE WITNESS: From the national.

24 THE COURT: Okay, thank you.

25 BY MR. HO:

1 Q Has there ever come a time that you've received any grants?

2 A No.

3 Q And, when I asked you that question, what do you understand  
4 to be a grant?

5 A What I understand to be grants would be state grants and  
6 federal grants.

7 And the reason I say no is because we have a  
8 policy at the NAACP that we are an advocacy organization and not  
9 an organization that provide programmatic services. So the  
10 national office -- we are 501C4's at the national level, which  
11 means we're not tax exempt. And we're part of a 501C3, which is  
12 a national organization. So, with the charters that's issued,  
13 we have to come under the guidelines of the 501C3 because we do  
14 not as a 501C4 file our own taxes. We spend reports to the  
15 national office, they attach those financial reports to the  
16 report of the 501C35.

17 Q When I asked you what you understood to be the meaning of --  
18 or, how you use the word grant, you said state and federal.  
19 What did you mean by that?

20 A Grants. As a 501C3, when you go get a grant from the state  
21 or federal government, we do not get those at the state  
22 conference level.

23 Q So you don't get funding from state and federal; is that  
24 you're saying?

25 A No.

1 Q But you do get funding from the national NAACP, is that what  
2 you're saying?

3 A From time to time, we do.

4 Q What about your expenses, do you -- what are some of the  
5 things that you expend money on?

6 A Well, around the convention, we have speakers that come in,  
7 materials that we have to get printed up, rooms that we might  
8 rent. So those are expenses that are centered around the  
9 convention. And we use the sponsorship monies to take care of  
10 that.

11 Now, for day-to-day operation, we do not pay rent,  
12 we do not pay electrical bills, we do not pay telephones bills.  
13 So, from a day-to-day standpoint, we have a bare-bone operation,  
14 and there's not a need to generate a whole lot of money for  
15 day-to-day operation.

16 Q So fair to say the state convention annually is your biggest  
17 expense?

18 A Correct.

19 Q What are some of the activities at the state convention?

20 A We have workshops. Workshops are always geared around our  
21 mission. We have education workshops. Political action.  
22 Political action is geared around two things, increasing voter  
23 registration and voter participation. So, on an annual basis --

24 Q I'll ask another question.

25 Do you have an annual budget?

1 A There is a budget that we present at the beginning of each  
2 year to the state conference for approval. Yes.

3 Q How long is that document?

4 A One page.

5 Q And is that -- you said at the beginning -- what month of  
6 the year is it?

7 A In January.

8 Q Is that the beginning or the end of your fiscal year?

9 A That is the beginning of the fiscal year. Our fiscal year  
10 is from January 1 through December 31st.

11 Q So are actual expenses reported in your budget?

12 A You mean, line items?

13 Q Yes.

14 A We don't have line items. We have general categories.

15 Q Do you amend the budget during the course of the year to  
16 reflect expenses?

17 A No. It's a very informal budget. We do it just to project  
18 what we might generate in terms of activities and finances. We  
19 never amend it.

20 Q Do you have a file with accounts receivable?

21 A No.

22 Q Do you record line item expenses in any single place?

23 A No. Nothing other than check stubs.

24 Q Why don't you record your line item expenses in any  
25 particular place?

1 A One, is not required by the national office to be in  
2 compliance.

3 And, two, the NAACP is made up of primarily at our  
4 levels -- when I say our level, I mean state and local levels --  
5 of volunteers. You know, we're never been able to raise enough  
6 money to have a paid executive director or paid staff. So, when  
7 you have volunteers who are basically trying to address  
8 discrimination, eliminating discrimination, racial prejudice and  
9 doing all the things that you have to do and then have a regular  
10 life too, it's just that that formality is not a part of the  
11 organization structure.

12 Q You've talked a little bit about work related to voting  
13 performed by the Louisiana State Conference of the NAACP. What  
14 are some of the kinds of voting related work that the Louisiana  
15 State Conference of the NAACP does?

16 A Like I say, on an annual basis, at the state level  
17 coordinating and at the local level, we do voter registration.

18 Q Other kinds of voting related work other than registration?

19 A Voter education.

20 And we also, because we are a 501C3, we do not  
21 endorse candidates, but we do get involved in elections. And  
22 our primary purpose is to increase voter registration and to  
23 increase voter participation. So, to that extent, you will see  
24 NAACP units mobilizing, like even for this upcoming election,  
25 between now and the election, you will see us mobilizing.

1                   You saw us probably mobilizing when you saw  
2 earlier in this courtroom where there were people in New Orleans  
3 that were passing out voter registration cards, because that's  
4 what our organization do on a regular basis. I can't tell you  
5 who did it because I'm not at that level for the actual  
6 implementation.

7       Q   We'll get to all of those questions. Let's try to -- I  
8 apologize, Dr. Johnson. I'm going to try to -- we will get  
9 there.

10               THE COURT: I think, Dr. Johnson, what he's saying is  
11 listen to the question and answer that.

12               MR. HO: I don't want to draw another objection from  
13 the defendants; but, I apologize, I don't want to cut you off.

14 BY MR. HO:

15       Q   I want to ask you some basic questions before we talk about  
16 the specifics.

17                   Why do you do this voting work?

18       A   It's part of the mission statement.

19       Q   With respect to voting related work, who does the Louisiana  
20 conference of NAACP try to reach?

21       A   African Americans.

22       Q   And are you involved personally in those efforts to register  
23 Africans Americans in the state of Louisiana?

24       A   No, I'm not.

25       Q   Are you aware of all the specific individual locations where



1 that activity takes place?

2 A No, I'm not.

3 Q Who would be the most knowledgeable person about that?

4 A Reverend Taylor.

5 Q I just have a few questions related to that topic for you,  
6 Dr. Johnson.

7 Do you remember giving a deposition in this case,  
8 Dr. Johnson?

9 A Yes, I do.

10 Q Do you remember the topics on which you were designated to  
11 testify?

12 MS. CANGELOSI: Objection, Your Honor. A deposition,  
13 what topics were you designated on. A deposition is a prior  
14 statement I would use to impeach. I don't know what he's  
15 talking about, a deposition.

16 THE COURT: I'm not sure where we're going, so maybe  
17 let's --

18 (Sidebar Conference.)

19 THE COURT: Where are we going?

20 MR. HO: Let me give the factual predicate.

21 Dr. Johnson has testified that he was designated to testify to  
22 some very specific topics during his deposition, including  
23 activities other than voter registration. He's not  
24 knowledgeable about where every specific location of voter  
25 registration takes place. The defendants have been trying to

1 argue that he should be, does he know this stuff. And I'm just  
2 trying to establish for the record that his level of knowledge  
3 is at a very high level setting policy for the organization and  
4 not in terms of implementing.

5 MS. CANGELOSI: I think we've agreed to that, he was  
6 sworn to in his deposition --

7 THE COURT: I think it's like the same issue we had  
8 last time, you can get there, you just got to take a different  
9 route.

10 MR. HO: Route.

11 MS. CANGELOSI: What's the different route?

12 THE COURT: Ask him some more questions.

13 (Sidebar concluded.)

14 BY MR. HO:

15 Q What responsibilities if any do you have, Dr. Johnson, with  
16 respect to voter registration?

17 A Probably nothing other than appointing of Reverend Taylor to  
18 implement whatever the program is.

19 MR. HO: I don't have any other questions for you at  
20 this time, Dr. Johnson. The attorneys for the defendants, I'm  
21 sure, are going to have some questions for you, and judge may  
22 also as well. And, after that, I may have some follow up. But,  
23 for now, I think I'm finished.

24 THE WITNESS: Thank you very much.

25 MR. HO: Thank you.

1 THE COURT: Ms. Cangelosi?

2 I think it would be better if we have some sort of  
3 system, so we're going to go with the Secretary of State, and  
4 then DCFS.

5 MR. PHILIPS: We just arranged to do it in that order  
6 for the next couple of witnesses, Your Honor.

7 THE COURT: That's fine.

8 Ms. Cangelosi.

9 CROSS EXAMINATION

10 BY MS. CANGELOSI:

11 Q Mr. Johnson, good morning. I'm Celia Cangelosi.

12 We know each other; don't we?

13 A Yes, ma'am.

14 How you doing, Ms. Cangelosi?

15 Q Fine.

16 A Great.

17 Q The name of the organization who is the plaintiff in this  
18 case, what do you understand that name to be?

19 A NAACP Louisiana State Conference of Youth Council -- NAACP  
20 Louisiana State Conference of Adult Branches, Youth Councils and  
21 College Chapters.

22 Q Okay.

23 A Let me write that down.

24 Q And where did you get that name from?

25 A You know, Ms. Cangelosi, I guess maybe I picked it up

1 because Rupert Richardson was using that name. But that was the  
2 name that would be in the bylaws, and I don't have a copy of the  
3 bylaws in front of me. But I think that's the official name of  
4 the organization. So we may use NAACP Louisiana State  
5 Conference --

6 Q So you think the official name of the organization is NAACP  
7 Louisiana State Conference of Adult Branches, Youth Councils and  
8 College Chapters?

9 A I think so.

10 Q Okay.

11 So the official name is not the Louisiana State  
12 Conference of the NAACP?

13 A No. That's a d/b/a.

14 Q And the official name is not State Conference of Louisiana  
15 or NAACP State Conference of Louisiana?

16 A Well, I've never heard of the State Conference of the NAACP,  
17 but ...

18 Q We will get to that in a second.

19 The whatever the state organization's name is, the  
20 parties filed suit is Louisiana State Conference of NAACP. You  
21 are saying the official name is NAACP Louisiana State Conference  
22 of the Adult Operations, Youth Councils and --

23 A I didn't say that. You asked me my understanding, that was  
24 my understanding. I didn't say it was the official name.

25 Q So you don't know what the official name is?

1 A It's in the bylaws.

2 Q So, sitting here today, you don't know what the official  
3 name is?

4 A I'd have to read the bylaws. I can't tell you that.

5 Q So you don't know.

6 It's your opinion, is it not, that this  
7 organization operates under a charter?

8 A Correct.

9 Q Hum?

10 A Correct.

11 Q And that charter, you believe, came into existence 70 or 75  
12 years ago, you're not sure about the exact date?

13 A Correct.

14 Q And you don't have a copy of the charter?

15 A Correct.

16 Q And you've never seen a copy of the charter?

17 A Correct.

18 Q So the charter might have some title or name, but you don't  
19 know what that is because you've never seen it?

20 A That's a good presumption. I don't know.

21 Q Well, you have seen it?

22 A Since I haven't seen it, I don't know whether what you're  
23 saying is true or not.

24 Q Let me back up a little bit. Have you seen the charter?

25 A No.

1 Q Do you know what the name of the organization in the charter  
2 is?

3 A No.

4 Q And nobody in the organization has a copy of the charter  
5 that you're aware of. You're the president, and you don't have  
6 a copy?

7 A No.

8 Q It's in this organization, whatever it's name is that you're  
9 the president of, it's not incorporated; is it?

10 A No, it's not.

11 Q So it's not a corporation, it's not registered with the  
12 Louisiana Secretary of State's Office, for instance?

13 A No. It's an association.

14 Q Okay. The national organization, which is called the  
15 National Association for the Advancement of Colored People --  
16 right? That's the national organization?

17 A Yes.

18 Q The national organization is a corporation. It's  
19 incorporated; is it not?

20 A Correct.

21 Q But the state entity in Louisiana is not incorporated?

22 A Correct.

23 Q You testified that you don't have individuals as members of  
24 the Louisiana State Conference or whatever the Louisiana group  
25 is; is that right?

1 A No. I say we don't have individual members. Individuals  
2 are members indirectly, but we don't have individual members.

3 Q Do you have a list of the members of the Louisiana State  
4 Conference of the NAACP, or whatever its name is?

5 A Well, I refer to it -- I refer to the organization as  
6 Louisiana NAACP, Ms. Cangelosi.

7 Q Okay. You want to call it the Louisiana NAACP?

8 A Yes, ma'am.

9 And the national office has never said anything  
10 about it. And the state of Louisiana has never said anything  
11 about it either.

12 Q Said about what?

13 A Louisiana NAACP, that's the name that we refer to. When we  
14 say Louisiana NAACP, I don't think there's no misunderstanding  
15 about the organization. It's the NAACP in Louisiana.

16 Q The person who filed suit is the Louisiana State Conference  
17 of the NAACP?

18 A That's a good name.

19 Q You say the name is NAACP, Louisiana State Conference of  
20 adult branches, Youth Councils and College Chapters?

21 A Right. And the short form name that we could use is NAACP  
22 Louisiana State Conference, Ms. Cangelosi.

23 Q And you say you operate under a charter, but you don't know  
24 what the name is of the charter?

25 MR. HO: Objection. Asked and answered.

1 THE COURT: Sustained.

2 BY MS. CANGELOSI:

3 Q All right. Let's talk about members.

4 It's my understanding that an individual person --  
5 I'm an individual, you know, a separate human entity -- an  
6 individual person cannot be a member of that organization that  
7 you call the LA NAACP.

8 A Cannot be a direct member, that's correct.

9 Q But there's no other kind of member. You're a member or  
10 you're not. There's no direct or indirect members; is that  
11 correct?

12 A There's indirect, Ms. Cangelosi. There's two types of  
13 memberships. You have membership where you join directly, and  
14 you have memberships where you join indirectly.

15 Q Let me ask the question, if you don't mind.

16 THE COURT: Let her ask the questions. We'll follow  
17 up. You're entitled to answer the questions.

18 BY MS. CANGELOSI:

19 Q The only persons who can be members of the Louisiana State  
20 Conference of the NAACP are either adult branches, college  
21 chapters or youth councils; is that correct?

22 A Well, there are other organs of the organization that can be  
23 a member of the state conference coordinating body, but those  
24 are the units of the state. And, in order for any individual to  
25 be a member of the state conference, they have to be members of



1 those individual units.

2 Q So your testimony today here in court is that an individual  
3 can be member of the Louisiana State Conference of the NAACP?

4 A No, ma'am. Not directly. We cannot have an at-large person  
5 coming in and buying a membership in the state. As I said to  
6 you in the deposition, I'm in the Baton Rouge branch. The only  
7 way I could be state conference president is that I would have  
8 to be a member of a branch. I'm member of the branch Baton  
9 Rouge branch, which is also in the state conference. Which  
10 means that I can be elected as president of the Louisiana NAACP  
11 as a member indirectly. I can't go buy a membership in the  
12 state conference.

13 Q Do you remember your deposition on June 6, 2012 in this  
14 case?

15 A Yes.

16 Q And you were at Mr. Ron Wilson's office, and you were under  
17 oath and sworn to tell the truth?

18 A Yes.

19 Q Did you not tell me on that date -- give me a second:

20 So, back to who are members of the Louisiana State  
21 Conference of the NAACP, and that would be corporate bodies in  
22 the local unit?

23 And you said: Yes, in the local unit.

24 Anybody or anything else?

25 No.

1 Do you know how many corporate bodies that are  
2 members?

3 I don't have any.

4 So you don't have any corporate bodies in  
5 Louisiana?

6 Not in Louisiana.

7 Was that your testimony at that time?

8 A Yes. That's correct, Mr. Cangelosi.

9 Q All right.

10 Did you also tell me --

11 MS. CANGELOSI: Give me a second, Judge.

12 BY MS. CANGELOSI:

13 Q -- you didn't tell me on that date that there was anything  
14 other than those kind of members; did you?

15 A I'm not sure -- I don't know.

16 MR. HO: Objection Your Honor. If she's going to  
17 impeach with a deposition transcript, we need to know the page  
18 number, the question that's being asked.

19 MS. CANGELOSI: I just need a few minutes, because I  
20 didn't think he was going to change his answer.

21 THE COURT: Actually, I haven't heard a change yet.  
22 But you can keep reading.

23 (Pause in proceedings.)

24 BY MS. CANGELOSI:

25 Q You told me, did you not, that you were -- you individually

1 were not a member of the Louisiana state conference of the  
2 NAACP; is that correct?

3 A That's correct, yes.

4 Q That's because individuals cannot be members?

5 A Cannot be direct members of the state conference.

6 Q So do you have some document that talks about direct members  
7 and indirect members? Because I don't know what direct and  
8 indirect member -- is that a term defined in law somewhere?  
9 What's a direct and an indirect member?

10 A I don't know, but membership is defined in the bylaws, Ms.  
11 Cangelosi. It's my understanding from counsel that you've been  
12 provided a copy of the bylaws. So membership really is defined  
13 in the bylaws.

14 Q Do you have that copy of the bylaws?

15 A Surely.

16 Q So you don't have that with you today to provide it to me?

17 A It was my understanding it was provided through discovery to  
18 your office. I'm not sure.

19 Q So you know all about what was provided in discovery. I was  
20 going to ask some questions about that later, that's good.

21 MR. HO: Objection, Your Honor. This is getting  
22 argumentative, and that also mischaracterizes his testimony.

23 THE COURT: Sustained.

24 BY MS. CANGELOSI:

25 Q So the only members are adult branches, college chapters or

1 youth councils; is that correct? Of the Louisiana State  
2 Conference of NAACP.

3 A Did you mention corporate sponsors?

4 Q You don't have any corporate sponsors, I thought.

5 A But there can be.

6 Q But you don't have any; do you?

7 A No. Right.

8 Q So the only members of the Louisiana state conference of the  
9 NAACP are adult branches, youth councils or prison branches; is  
10 that correct?

11 A That's correct.

12 Q And, by adult branches, they're by geographic areas in the  
13 state; is that correct?

14 A Correct.

15 Q So there is a Baton Rouge branch, that's one of your adult  
16 branches that's a member; is that correct?

17 A Yes.

18 Q The New Orleans branch, that's one of your adult branches  
19 that's a member?

20 A Correct.

21 Q And then we go on with the rest of the state.

22 Those adult branches, the Baton Rouge branch of  
23 the NAACP, they operate under their own charter from the  
24 national organization; do they not?

25 A Yes, they do.

1 Q Okay. So you have a charter -- which we haven't seen -- and  
2 they have a charter?

3 A Right.

4 Q Two different chartered organizations?

5 A Yes.

6 Q So you have a charter, and your members under you have a  
7 charter as well?

8 A Yes.

9 Q Now, back to the name thing, you have some letterhead and  
10 signed some letters, did you not, that say NAACP State  
11 Conference of Louisiana with that name on it?

12 A Probably so.

13 Q You admitted in your deposition, did you not, that you  
14 thought you were president of an organization called the NAACP  
15 State Conference of Louisiana?

16 A Ms. Cangelosi --

17 MR. HO: Objection, Your Honor.

18 MS. CANGELOSI: You want us to approach, Judge?

19 THE COURT: Please.

20 (Sidebar conference.)

21 MR. HO: This question has been asked and answered. At  
22 this point, she's badgering the witness.

23 THE COURT: Ms. Cangelosi.

24 MS. CANGELOSI: I don't think I'm badgering the  
25 witness. I don't know what the organization is, Judge. I'm

1 trying to share -- I don't know what the name is, I don't know  
2 who the members are. I think they're trying to -- I think it's  
3 very relevant and very important to who this organization is.

4 THE COURT: You're getting to the point where you're  
5 badgering because I think we're retreading the same ground. I'm  
6 going to let you finish this one line of questioning, and then  
7 no more. But he has said it multiple times, this is what we are  
8 and these are the members.

9 MS. CANGELOSI: I'm just responding to questions about  
10 you have a name, it's on letters, you told me you were  
11 president.

12 THE COURT: You can go there, but then we're going to  
13 move on, I'm telling you.

14 (Sidebar concluded.)

15 BY MS. CANGELOSI:

16 Q I think my question was, Mr. Johnson, is that you signed  
17 letters with letterhead that say that you're the president of  
18 the NAACP State Conference of Louisiana, that's the name of the  
19 organization? Do you know?

20 A I don't really remember.

21 Q Okay. Do you remember giving your deposition on June 6th,  
22 2012 in this case?

23 A Yes.

24 Q And I asked you, I showed you a letter, and I said: Do you  
25 remember this, is that a letter that you authorized to be sent

1 under your signature?

2 Yes.

3 Question: At the top of the page, it says: NAACP  
4 Louisiana State Conference.

5 You say: Correct.

6 And I say: And the signature line says that you  
7 were the state president?

8 Correct.

9 And I say: Is that the name of the organization  
10 that you were the president of, NAACP Louisiana State  
11 Conference?

12 And you say: Correct.

13 A Correct. I mean, you're saying Louisiana State Conference,  
14 NAACP Louisiana State Conference.

15 Q That was the question.

16 And is that the name of the organization that  
17 you're the president of, NAACP Louisiana State Conference?

18 A Yes.

19 Q Okay. That's what you said?

20 A Sure.

21 Q You know, there was another letter as well where you had  
22 identified it the same way; is that correct?

23 A Correct.

24 Q So is the NAACP Louisiana State Conference is the same  
25 entity as the plaintiff in this suit, Louisiana State Conference

1 of the NAACP?

2 A Yes. And I'll authorize the filing of the lawsuit on behalf  
3 of the state conference. That it was later presented at a  
4 meeting of the Louisiana State Conference and approved by the  
5 resolution of the members meeting. And, in an official meeting  
6 of this organization in Baton Rouge, we authorized that this  
7 lawsuit be filed because we're concerned with making sure that  
8 everybody comply with the law to register voters.

9 Q So you authorized the filing of the lawsuit at a meeting in  
10 Baton Rouge?

11 A At a meeting in Baton Rouge.

12 Q When we took your deposition -- do you remember taking your  
13 deposition on July 31st: You remember where the meeting was  
14 held?

15 A Well, I don't know. I thought -- I couldn't remember  
16 whether it was in January or March meeting. I didn't know that  
17 it was about where the meeting was.

18 Q Do you want me to find the location where you couldn't  
19 remember the place where it was held?

20 A Yes, please.

21 (Pause in proceedings.)

22 MS. CANGELOSI: It might take me a minute, too, Judge.  
23 I didn't anticipate that.

24 (Pause in proceedings.)

25 BY MS. CANGELOSI:



1 Q When you were asked, you said --

2 THE COURT: What page?

3 MS. CANGELOSI: Of the deposition on July 31st, which  
4 just is SOS Exhibit 52, it's on page 21.

5 BY MS. CANGELOSI:

6 Q My question was: Where were you when the resolution was  
7 passed?

8 Answer: I was conducting the meeting. You mean,  
9 like, in what city where we were at?

10 Question: Well, what state?

11 Answer: In Baton Rouge.

12 Oh, you did say that. Got me on that one.

13 A Ms. Cangelosi, we can live with that.

14 THE COURT: Ms. Cangelosi, that was effective  
15 impeachment.

16 MS. CANGELOSI: I'm willing to admit my mistakes.

17 BY MS. CANGELOSI:

18 Q In all seriousness. We're not all perfect.

19 Okay. You said you authorized the filing of this  
20 lawsuit in your testimony, I believe that was in January or  
21 March of 2011 when the Louisiana State Conference of the NAACP  
22 at a meeting passed a resolution to authorize the filing of this  
23 lawsuit; is that correct?

24 A Yes.

25 Q All right.

1                   Who brought the information to the Louisiana State  
2 Conference of the NAACP that resulted in the resolution to  
3 authorize the filing of the lawsuit?

4                   MR. HO: I'm going to object, Your Honor. I think this  
5 goes -- is directly contra -- contravenes your ruling on the  
6 motion.

7                   MS. CANGELOSI: Your Honor, can I approach?

8                   THE COURT: You can approach, but I think we briefed  
9 this in a motion in limine.

10                   (Sidebar conference.)

11                   MS. CANGELOSI: I agree that he wrote it, but he opened  
12 the door. I think he opened the door by him saying they brought  
13 in evidence, and the witness opened the door by saying I  
14 offered. I think that -- I wasn't allowed to bring it up by  
15 your earlier ruling. But, for them to bring it up through the  
16 testimony, he's opened the door. He has opened the door about  
17 the filing of the lawsuit by his answer.

18                   MR. HO: I don't think he did that. He didn't talk  
19 about the reasons, the manner in which he became plaintiffs in  
20 the lawsuit. That's a very different issue than what the  
21 question was about, which is who is the plaintiff in the case,  
22 which is what he was trying to answer.

23                   MS. CANGELOSI: But he opened the door. He brought it  
24 up. He said it. He was at the state conference. He said: I  
25 brought the lawsuit. He brought it up, and he's acting like it

1 was. He said he couldn't bring up how they got involved in the  
2 lawsuit. I wasn't going to ask him about the resolution. He  
3 opened the door. He said the Louisiana state conference -- he's  
4 like he initiated the lawsuit. I didn't open that up. He did,  
5 by his testimony. I can't let him open that door and me not go  
6 through it.

7 THE COURT: I think I've already ruled on a motion in  
8 limine. I don't think he's opened the door. I think he talked  
9 about authorization and passing the resolution, but we're not  
10 going any further than that unless he continues to talk.

11 MS. CANGELOSI: Just note my objection for the record.

12 THE COURT: Sure.

13 (Sidebar concluded.)

14 BY MS. CANGELOSI:

15 Q I kind of remember, Mr. Johnson, you saying some things  
16 about the NAACP being involved in different voting rights  
17 legislation historically -- let me see if I can find my notes on  
18 that.

19 I can't find my notes on that. But the Louisiana  
20 State Conference of the NAACP, you don't have any knowledge that  
21 it was involved in the passage of the 1965 Voting Rights Act,  
22 for instance; do you?

23 A No.

24 Q And it couldn't have been involved in things as alleged in  
25 the petition that occurred in 1909 and 1915 of the Louisiana

1 State Conference; could it?

2 A Well, it depends, Ms. Cangelosi.

3 Q Let me ask you this. Did the Louisiana State Conference of  
4 NAACP exist in 1909?

5 A No. But the parent did.

6 Q The Louisiana State Conference --

7 A We're children of the parent.

8 Q Did the Louisiana State Conference -- oh, so it has parents  
9 back from 70 years ago?

10 A The parent is the national office of the NAACP, which is the  
11 parent. And all of the units come under the parent.

12 Q Is that a legal term, parent?

13 A Well --

14 Q The national organization is a corporation; is it not?

15 A That issue charters to various units. And we report to the  
16 national organization. I mean, we don't file individual taxes.  
17 We send reports to the national, and the national files one on  
18 our tax returns.

19 Q Is your testimony anything that the national organization,  
20 the NAACP, does, is attributable to the Louisiana organization?

21 A Yeah.

22 Q So that's your testimony --

23 A Attributable to all NAACP units.

24 Q So your testimony here today is, anything that the national  
25 organization does is -- the Louisiana State Conference of the

1 NAACP has done, it's their action as well?

2 A I think it's separate actions. I'm not sure which actions  
3 you're talking about, in other words the national.

4 Q I'm talking about in 1909, did the Louisiana State  
5 Conference of the NAACP have any activities with respect to to  
6 this case or the voting rights act?

7 A I don't know, Ms. Cangelosi.

8 Q So -- but they didn't exist in 1909; did they?

9 A No.

10 Q And it didn't exist in 1915 to do any other kind of work  
11 either; did it? The Louisiana State Conference?

12 A I don't know, Ms. Cangelosi.

13 Q So you think it might have existed in 1915?

14 A I just don't --

15 THE COURT: Is that 1915, or 1950?

16 MS. CANGELOSI: 15.

17 THE WITNESS: I don't know, ma'am. Because, at a  
18 certain point in time, when we say 70 years in Louisiana, as I  
19 was discussing in deposition, that was a period of time that the  
20 NAACP in Louisiana was included as a result of the white  
21 citizens council wanting to pass legislation to look at the  
22 membership roster. So that was a period of time. But I'm not a  
23 historian, I don't know all of that history. All I know, I just  
24 go by what I got. We 70 years, we just celebrated our 70 years  
25 convention. But I have not gone back and done the research to

1 see when the charters -- there were some state charters issued  
2 in 1915. Some of the first ones were issued in 1915.

3 I really can't say, you know, when Louisiana's  
4 charter was first issued, I just don't know.

5 Q It's because you've never seen it.

6 So you don't know when the Louisiana state  
7 conference of the NAACP even came into existence; do you?

8 A No. All I have is the charter number, 6045.

9 Q But you don't have a copy of the charter, and you haven't  
10 seen it?

11 MR. HO: Objection. Asked and answered.

12 THE COURT: Sustained.

13 BY MS. CANGELOSI:

14 Q You talked about some programs and activities of the  
15 Louisiana State Conference. But, in your opinion, the Louisiana  
16 State Conference is more of an advocacy group than a programatic  
17 group; is that what you said?

18 A Yes.

19 Q I believe you have testified to that?

20 A Yes.

21 Q And the only programs that you're aware of that the  
22 Louisiana State Conference of NAACP have conducted are in  
23 connection with disaster relief; is that correct?

24 A No. We've conducted other programs.

25 Q Okay. Let me ask you to -- did you give your deposition on

1 June 6? Do you recall that?

2 A Yes.

3 MS. CANGELOSI: I have this marked wrong. Give me a  
4 sec.

5 (Pause in proceedings.)

6 BY MS. CANGELOSI:

7 Q Do you recall testifying in answer to the questions: So  
8 what kind of programs have you done, the Louisiana State  
9 Conference?

10 And this is on page 40, at the last, and on page  
11 41.

12 The answer: Well, the only programs I can tell  
13 you that we probably have done would be in connection with  
14 disaster relief. You know, we've handed out meals before, we've  
15 handed out goods at the Red Cross when Katrina hit New Orleans  
16 and in south Louisiana area with most of hurricanes, you know,  
17 we go into disaster relief mode. We have trained -- our members  
18 have been trained by the Red Cross to provide those types of  
19 services. I do not consider that to be programatic. But, as  
20 far as any other program, on a regular basis, we don't have any.

21 Is that your testimony on that date?

22 A Correct.

23 Q In regard to any programs other than disaster relief, it's  
24 really the local units, such as the Baton Rouge branch or the  
25 New Orleans branch, that perform those activities; is that

1 correct?

2 A I'm not sure what those -- what the local units do on a  
3 day-by-day basis.

4 Q So you don't know what the local units do?

5 A No, ma'am.

6 Q But do you remember giving your deposition on June 41 --  
7 June 6 where you said that any other programs other than the  
8 disaster relief would be done by the local units?

9 A If they're done, local programs, Ms. Cangelosi. I don't  
10 know of any programs that they're doing. I don't manage the  
11 local units. I'm not the executive director of the NAACP. I'm  
12 a volunteer president.

13 Q Didn't you tell me, any other programs besides disaster  
14 relief would be done by the local units because they're  
15 independently chartered and they independently have a right to  
16 do whatever they want?

17 A No, ma'am. They're independently chartered, but I don't know  
18 if they have an independent right. They have to report to the  
19 national office. And the organization's policy is that all the  
20 units should be advocacy rather than going out to get grants.  
21 Now, I don't know how --

22 Q Let's just kind of answer questions here, if we can.

23 MR. PHILIPS: If I may, Judge --

24 THE COURT: Wait, wait. He can finish his answer.

25 MR. PHILIPS: Thank you, Judge.



1 THE WITNESS: I don't know how a 501C4 is going to get  
2 grant money when you have to be a 501C3. But there may be some  
3 things going on. That's why I'm being cautious to say I'm not  
4 sure what local units are doing.

5 BY MS. CANGELOSI:

6 Q Do you recall giving your deposition on June 6, page 41, in  
7 response to the question: So besides the programatic stuff  
8 which is in the connection with disaster relief and your  
9 advocacy things such as protests, marches, litigation,  
10 legislation, ya'll all don't have any other activities that you  
11 can think of? That's the question.

12 Do you recall your answer being: Not at the state  
13 level. Now, you have to remember that even the local units  
14 independently have a right, because they are independently  
15 chartered by the national organization, they have a right to do  
16 whatever they are going to do locally. So I'm not speaking for  
17 those local units that we have been talking about, I'm just  
18 talking about the Louisiana State Conference.

19 A That's what I just said.

20 Q That's what you just said in your deposition.

21 A And that's what I just said in my testimony here today, too.

22 Q Well, that's subject to debate.

23 But you agree that that's correct?

24 MR. HO: Objection. Argumentative.

25 THE COURT: It's argumentative, sustained.

1 BY MS. CANGELOSI:

2 Q Now, the Louisiana State Conference is required to submit  
3 annual financial reports to the national organization; is that  
4 correct?

5 A Yes.

6 Q You don't fill those out; do you?

7 A No.

8 Q And you're not sure what they say what the monies are spent  
9 on each other, those annual financial reports?

10 A I can't tell you today testifying here what they say.

11 Q You don't know if the reports list what activities the money  
12 is spent on each year; do you?

13 A The treasurer fills out the reports. I countersign the  
14 report, but I trust the treasurer is doing what the treasurer  
15 ought to be doing.

16 Q So you don't know if the annual financial report lists what  
17 the activities the money is spent on each year; do you?

18 A No.

19 Q And you don't know if the local -- you know, what the local  
20 units report to the national organization, the Baton Rouge  
21 branch, the New Orleans branch, you don't know what they report;  
22 do you?

23 A No.

24 Q And it's the local units and branches, is it not, who have  
25 conducted the voter registration drives in the state of

1 Louisiana?

2 A No, that's not entirely true.

3 Q Okay. Do you remember giving your testimony on June 6th?

4 In this deposition, I mean?

5 A Yes, ma'am.

6 MS. CANGELOSI: Your Honor, I'm going to read from page  
7 67 of that, lines 13 to 16.

8 BY MS. CANGELOSI:

9 Q And did you say: Okay. Do you know, since 2001, what the  
10 Louisiana State Conference of NAACP has done regarding voter  
11 registration educations, was my question.

12 And your answer is: Basically, on an annual basis  
13 at our conference, we constantly have workshops on voter  
14 education and voter registration as a part of our basic mission.  
15 So we do it every year at the convention. In January, when we  
16 set activities for the year, the local units discuss how they  
17 intend for that year to do voter registration. I don't think  
18 enough is being done on education because we are constantly  
19 trying to do voter registration.

20 Is that your testimony at that time?

21 A I think your question was, were the local units the only  
22 units doing voter registration in the state. I said that's not  
23 necessarily true, because sometimes the state conference does  
24 voter registration and coordinate that with the local units.  
25 That's the same thing.

1 Q That's not what you said on that date. You said the local  
2 are the ones who do voter registration.

3 A They do voter registration, yes.

4 Q So you don't dispute that that's what you said on that date?

5 A No. That's partially true. It's not the whole truth.

6 Q And the local units are not required to report to you what  
7 they're doing regarding voter registration; is that correct?

8 A They're not legally required; but, from a programmatic  
9 coordinating standpoint, the Louisiana State Conference  
10 coordinates with all of the units in the state per the NAACP  
11 charter. And, in that coordination, there is oversight. And,  
12 as a result of that oversight, we meet on a quarterly basis,  
13 four times a year, at least four times a year, and the  
14 convention. And, at that period of time, the local units come  
15 in and they -- part of whatever our agenda is, the local unit  
16 reports. So that we can continue to provide oversight and  
17 continue to coordinate so that Shreveport will know what Baton  
18 Rouge is doing, Baton Rouge will know what New Orleans is doing,  
19 and we can continue to coordinate.

20 Q I don't have a requirement that you're supposed to get  
21 financial information from those local units, and they don't  
22 indicate how many man hours, they don't indicate what they are  
23 doing with respect to voter registration; do they?

24 A No, I don't.

25 Q Huh?

1 A I don't.

2 Q I'm talking about the Louisiana state conference. I don't  
3 mean Ernest Johnson individually, I'm talking about the entity.

4 A No. There's no requirement that they have to report up.  
5 But we do coordinate. Now, that oversight may take different  
6 forms at different times. It just depends on what the  
7 organization decide to do at a meeting.

8 Q So, they don't have to report to you on what they're doing  
9 and how many hours and what they're doing with respect to voter  
10 registration; is that correct?

11 A There's no legal requirement that they have to do it. But,  
12 as part of the overall coordinating of all of the units in the  
13 state, they do it. I've never seen a rule to say they have to  
14 do that. But we do it.

15 Q Do you recall testifying: We don't have a requirement that  
16 we get financial information from them that they indicate how  
17 many man hours; I don't have that.

18 Do you remember testifying as to that?

19 A Yes, don't have it.

20 Q Okay.

21 And you also -- you've also said that the  
22 Louisiana State Conference has never engaged in any direct  
23 effort to register voters who are in public assistance; is that  
24 correct?

25 A Well, I don't know what they've done practically. I know

1 and what I testified to is that we don't have a policy that  
2 direct our forces to any particular agency. That was my  
3 comment. I have nothing to do with the implementation of policy  
4 or resolutions. I have nothing to do with that.

5 Q When you were testifying on June 6 in your deposition, you  
6 were sworn to tell the truth; is that correct?

7 A Yes, ma'am.

8 Q And you told the truth; did you not?

9 A Yes, I did.

10 Q And did you not say: Of course there is no direct effort to  
11 register voters who are in public assistance?

12 MR. HO: Objection, Your Honor. We don't have a  
13 question, we don't have the complete answer, we don't have the  
14 context for this whatsoever.

15 THE COURT: Ms. Cangelosi, you need to give him the  
16 page.

17 MS. CANGELOSI: Starts on page 94.

18 BY MS. CANGELOSI:

19 Q The question: But do you have any personal knowledge of  
20 your organization, the Louisiana State Conference of the NAACP,  
21 expending any resources in monetary funds directed toward voter  
22 registration efforts as it relates to the Department of Children  
23 and Family Services' clients? And that was the question.

24 The answer was: Well, I certainly don't  
25 personally know. What you do is that you tag it with your

1 clients, your particular clients, and there's no information to  
2 say that this particular individual is there. What I will tell  
3 you is that, when you look at our community, we go on a  
4 statistical basis in terms of percentages of our people who are  
5 getting those benefits. And where we basically do voter  
6 registration in the area of inner cities.

7 Most of the time, when you look at areas where you  
8 have low voter registration, what you can do the comparative  
9 analysis to those neighbors and those individuals who are on  
10 those benefits. We don't do it in suburbs. We don't do it in  
11 places where folks have very large houses and stuff like that.  
12 I don't have a name, but I think statistically it probably will  
13 show. Of course there is not direct effort to register voters  
14 who are on public assistance.

15 A Right.

16 MR. HO: And the witness's answer finishes on to the  
17 next page.

18 MS. CANGELOSI: Admit that was his answer. I don't  
19 need any more for my purpose. He admits that was his answer.

20 THE COURT: Please proceed.

21 BY MS. CANGELOSI:

22 Q What's the legal defense fund?

23 A Excuse me?

24 Q What's the legal defense fund? Are you familiar with an  
25 entity that's known as the legal defense fund?

1 A Are you talking about the NAACP legal defense fund, or legal  
2 defense -- there are a lot of defense funds. Which legal  
3 defense funds are you talking about?

4 Q In your deposition, you made reference to the legal defense  
5 fund. Do you know what you were talking about?

6 A Can you refresh my memory? Can I see the testimony?

7 Q This is your deposition of July 31st, page 35, line 16 to  
8 18.

9 Did you state that LDF sends voter registration  
10 everywhere for the units to be able to pass out voter  
11 registration cards?

12 A Yes.

13 Q And LDF is who?

14 A NAACP legal defense fund.

15 Q And they sent them down every year for the Baton Rouge  
16 branch, the New Orleans branch to pass out the voter  
17 registration cards; is that correct?

18 A They send them down for the New Orleans, and we have them at  
19 our workshops. I remember, our workshops at the conference, all  
20 the units are required to attend the workshops. The political  
21 action which involves increased voter registration and increased  
22 voter registration participation.

23 Q And they give them to the units for the units to pass out  
24 the voter registration cards, the LDF does; is that correct?

25 A Not necessarily the units. The members who are in



1 attendance. You've got to remember that the units themselves  
2 don't attend the convention. It's the members. Units who are  
3 indirectly members of the Louisiana NAACP that attend the  
4 conferences.

5 Q You testified on July 31st the LDF sent voter registration  
6 cards down, like they do every year, for the units to be able to  
7 pass out voter registration cards.

8 A That's correct.

9 Q That's all I wanted to know.

10 A Sure.

11 Q Louisiana State Conference has named officers; does it not?  
12 President, several vice presidents, a secretary and treasurer?

13 A Yes.

14 Q They have named committees and committee chairs?

15 A Yes.

16 Q They don't have any directors?

17 A From time to time, we do have directors. It depends on  
18 whether they are appointed.

19 Q Do you recall giving your deposition on June 6th, page -- I  
20 think it looks like page 45, lines 4 to 6?

21 I said, question: You have officers, okay. We  
22 will talk about them in a minute. Does the state conference  
23 have committees or directors or --

24 Answer: We have committees.

25 Question: So you have committees. Do you have

1 directors?

2 And the answer was: No.

3 A No, we don't have directors. We have officers, standing  
4 committee chairs. From time to time, when there is appointment  
5 for special projects, there would be a director.

6 And the reason why I say that is, when Reverend  
7 Taylor was appointed as the executive director of the NAACP  
8 advocacy center, that was, quote, unquote, a director.

9 Q But when I had asked you on June 6th, you told me there were  
10 no directors?

11 A We don't have any.

12 Q That's what I'm asking you.

13 But, now, you're saying you have a director.  
14 That's all I wanted to know.

15 A From time to time, we do have to have special appointments,  
16 and those people become directors.

17 We do not, in our bylaws -- and, you have to  
18 understand, most of the times I'm talking to you, I'm talking  
19 about bylaws, policy at the level I'm at. We do not have in our  
20 bylaws structured directors. That's a true answer.

21 Q All right. And you don't have any directors, is what you  
22 told me on June 6th --

23 A Until we get some funding.

24 Q Whether in your bylaw structure or otherwise?

25 MR. HO: Objection, Your Honor. This is cumulative,

1 and also I think we're confusing director.

2 MS. CANGELOSI: Objection. I'm going to object to him  
3 testifying.

4 THE COURT: I've already talked about speaking  
5 objections.

6 It's been asked and answered, and I think it's  
7 time to move on.

8 BY MS. CANGELOSI:

9 Q You all have a treasurer, and that's Mr. Heckard; is that  
10 correct?

11 A Yes.

12 Q And he's the one that would be in charge of financial  
13 related records; is that correct.

14 A Yes.

15 Q And you maintain checking accounts where all of -- Louisiana  
16 State Conference maintains checking accounts where all the money  
17 is deposited in and all the expenses are paid out; is that  
18 correct?

19 A Yes.

20 Q And the Louisiana State Conference has never received any  
21 form of grants; is that correct?

22 A That statement is not correct by itself. When I say grants,  
23 federal and state.

24 Q Do you remember giving your deposition on June 6th in this  
25 case, yes or no?

1 A Yes.

2 THE COURT: You need to answer the question.

3 THE WITNESS: Yes.

4 BY MS. CANGELOSI:

5 Q And, on page -- several places -- but on page 38, the  
6 question was asked on page 38 line 12: Do ya'll get grants  
7 sometimes?

8 Answer: No. We probably could, but the NAACP  
9 some years ago -- well, the powers to be felt that it would be  
10 more of an advocacy than a programmatic agency. I sure the  
11 programs tie into advocacy but I don't see how you can do  
12 advocacy and not do programs, you know, because we are not a  
13 501C3 at the state and local level.

14 Was that your answer on that day?

15 A Yes. Yes, it was.

16 Q And then again on page 39, question was: And in response to  
17 something else, you say: I would at least take you to lunch.

18 All right.

19 So the question was: So you don't get grant  
20 money?

21 Answer: No.

22 Question: Again, okay. Have ya'll ever gotten  
23 grant money from anybody or anything?

24 And your answer was no on that date; is that  
25 correct?

1 A Yes.

2 Q All right.

3 MS. CANGELOSI: That's all the questions I have. Thank  
4 you very much.

5 THE WITNESS: Thank you very much, Ms. Cangelosi.

6 THE COURT: Mr. Philips.

7 CROSS EXAMINATION

8 BY MR. PHILIPS:

9 Q Mr. Johnson, hi. I'm Skip Philips. I represent, along with  
10 my co-counsel, the Department of Children and Family Services  
11 and the Department of Health & Hospitals.

12 How are you doing?

13 A Good.

14 How are you?

15 Q I have some questions that really are focused on not so much  
16 the organization, which I think you've covered, but a little bit  
17 more about what oversight and coordination means from your  
18 perspective as the state president. Okay?

19 A Okay.

20 Q You talked about units. And, as I understand, the units,  
21 the local organizations -- and they receive their direct charter  
22 from the national organization; right?

23 A Yes.

24 Q So, if I was drawing an organizational chart, I would have  
25 the NAACP in a block here, and then there would be solid lines

1 that connect that headquarters to all of the local chapters or  
2 units around the country; is that true? In other words, they  
3 answer directly to the national headquarters for their charter  
4 and for their existence?

5 A Certainly for the charter. But the organization chart  
6 wouldn't necessarily be true as far as oversight is concerned.  
7 It would be national at the top, state conference and then under  
8 state conference it would be all of these various units. And  
9 this has changed over the years. Like I say, I'm on the board  
10 of directors. So, while we have charters, we're also regulated  
11 by resolutions from the board from time to time, by amendments  
12 to the constitution. So, right now, where it exists would be  
13 the national, states and then local units.

14 Q And, if there's going to be for example the revocation of a  
15 local unit's charter, is that a decision that the state  
16 organization makes, or the national organization makes?

17 A It is made at the board level of the national with the  
18 recommendation of the state. The state has to get involved in  
19 that. The state can either make the recommendation to revoke or  
20 if in fact -- and, even to get new charters. The state, right  
21 now, the way we have it set up, the state conference has more  
22 authority than it's ever had basically in the past.

23 Q But it's a recommending role, not an approval role, at the  
24 state level?

25 A Well, it has been approval role; because, if it's not

1 approved by the state, it doesn't get to the board.

2 Q So, if I want to start a local charter and I go to the  
3 state, and the state says we're not going to approve this, I'm  
4 not able to go to the national organization and still get a  
5 charter?

6 A You won't get it.

7 Q I won't get it as a practical matter, or I won't get it  
8 because the national office wouldn't consider it without the  
9 state's approval?

10 A The state that is it sign off on it.

11 Q What directive authority does the state organization have to  
12 make a local unit do or not do something?

13 A It's in the bylaws. I don't have the bylaws with me. I  
14 mean, it's all in the bylaws.

15 Q This is kind of important, so help me with this. Can the  
16 state chapter -- the state headquarters, the conference, can --  
17 if you want to undertake an activity, can you direct a local  
18 organization to participate in it?

19 A You would have to give me a specific on that so I can  
20 understand what you're saying.

21 Q Fair enough.

22 Let's suppose that the officers, the executive  
23 committee of the state conference, decides to engage in a voter  
24 registration drive in central Louisiana. You think that's a  
25 good thing for you to do. Can you pass a resolution that

1 directs the Alexandria chapter of the NAACP to conduct the voter  
2 registration drive?

3 A No. If the state was doing a voter registration drive and  
4 we vote to do a voter registration drive, we would do the voter  
5 registration drive. The local unit is a part of the state,  
6 they're a part of the vote.

7 Q How would you do it? You told us you don't have any  
8 individual members. So if you voted to --

9 A No, no. I didn't say that. No. I said, directly, we don't  
10 have individual members. But, indirectly, the members of the  
11 local unit are members of the state.

12 Q Well, let's just --

13 A Think it's very important to keep that --

14 Q Excuse me, I didn't mean to talk over you.

15 If you don't have members that are direct members,  
16 to use your word, of this state organization, how can you direct  
17 a unit, a local organization, to engage in some activity that  
18 the state organization thinks is important?

19 A I don't understand your question.

20 Q Well, it's real simple. Suppose the Louisiana conference  
21 says at your executive committee meeting: We would like to do a  
22 voter registration drive in central Louisiana. We don't have  
23 any direct members, we can't look around in our meeting and say:  
24 Well, let's go do that. So we're going to tell the Alexandria  
25 chapter in central Louisiana to conduct a voter registration



1 drive.

2 Do you have the authority to do that?

3 A We don't have authority to tell anybody to do anything. The  
4 national don't have authority to tell anybody to do anything.  
5 The charters's not set up that way, where there is an  
6 enforcement position where there is a dictatorial piece. It's  
7 more or less everybody working together. That's why I say the  
8 state conference is the coordinating unit. But it's not a  
9 dictatorial we go ahead and make you do this or that. Most of  
10 the times, the things that we do is everybody is in accord and  
11 we have a working relationship. So I've never been faced with  
12 the situation that you're talking about?

13 Q But their participation in my hypothetical, for example,  
14 would be voluntary. The people in the Alexandria, Louisiana  
15 chapter would say: Yeah, we think that's a good idea, we want  
16 to do that?

17 A For all of us who are volunteers and members of the  
18 organization are voluntary. Now, if in fact there are some  
19 things that are not being done, then we need to file a request  
20 to have charters revoked, having members expelled. I mean, we  
21 do have provisions within the bylaws to handle individuals who  
22 don't comply. But it's not a dictatorial where we go make  
23 somebody do something.

24 Q Who has the authority to do that? Is that the recommending  
25 authority that you have that goes up to national? Or do you

1 have the authority at the state level to disqualify a member or  
2 revoke a charter?

3 A It's the state. I mean, national. The national handles all  
4 of the enforcement.

5 Q I understood the part about exchanging information about  
6 what various chapters are doing, and that's one of your  
7 coordinating functions; right?

8 A Yes.

9 Q I was concerned about the oversight and what that means in  
10 terms of your ability to direct some local unit to do or maybe  
11 not do something. So let me give you an example on the other  
12 side.

13 Suppose the folks in Alexandria decide they want  
14 to do a voter registration drive. And, for some reason, the  
15 state organization thinks that's a bad idea. Bad timing, we are  
16 going to do it later, we don't think it's the right location.  
17 And you say to them: Do not do a voter registration drive. Are  
18 they bound to abide by your instructions?

19 A Well, to answer your question, no, they're not. But it's  
20 the hypothet is just not a practical hypothet. It would be the  
21 same way at the nation. Let's say the local Alexandria branch  
22 wanted to do something, voter registration, and the national  
23 says: We don't want you to do it. First of all, it is in  
24 compliance with our mission. You'd have to give me an example  
25 that's not -- the examples you're giving me is in compliance

1 with the mission, so it would be evil that we have a local unit  
2 that wants to do things in compliance with the mission. You'd  
3 have to give me something that is out of the mission, something  
4 that is renegade. In other words, there's some folk taking up  
5 money that they shouldn't be taking up money because they don't  
6 have the required -- whatever required for them to go take the  
7 money. Yes, the state conference can come in and can -- to  
8 recommend to the national board. Because we have a national  
9 board of directors. Not just like a national office, but we are  
10 an organization like any other organization, we have national  
11 board of directors. I'm on the national board of directors. We  
12 have a staff that carries out the policies and procedures of the  
13 national board. So it's an organizational structure. Like I  
14 told you, the structure is national at the top, state and all  
15 our local units. So, I mean, we're an organization.

16 Q The example you just used where a local organization is out  
17 collecting money, and the state believes that to be  
18 inappropriate -- That was your example; right?

19 A Right.

20 Q Is it true that the state could not issue an order to that  
21 local unit that says: Stop? And all could you do is go to the  
22 national and say: Please do something here, they're doing  
23 something we think is wrong?

24 A Yeah. As state president, I have authority to issue cease  
25 and desist letters to members of the local units and the local

1 units.

2 Q And that would say you may not?

3 A Yeah.

4 Q Do you have the same authority to say you must do something?

5 A I have authority to issue cease and desist orders. If they  
6 don't cease and desist, I have authority to file the complaint  
7 with the national office for the board to take action. But, at  
8 my level, as state conference president, I do have that type of  
9 oversight authority.

10 Q Is that inherent you believe in the position that you hold,  
11 or that reflected in some organizational documents or  
12 resolution? In other words, do you believe you can do it simply  
13 because you're the president, or are you authorized by the  
14 organization's governing documents that says you can do it?

15 A Yeah. I think it's probably the organization, the governing  
16 documents.

17 And the reason why I say that is I'm also the  
18 chairman of the National Board of Directors Membership, the  
19 Units Committee. And I just had a Membership Units Committee  
20 meeting last night. So it happens all over the country. But I  
21 can tell you, the state president has authority to issue the  
22 cease and desist.

23 Now, can they go in and stop it? No. They can  
24 issue the cease and desist hoping that there would be  
25 compliance. So what happens when you issue a cease and desist

1 and there's no compliance? Then you file a complaint with the  
2 national office, and the national president has authority to  
3 suspend at that point in time. Then it goes to the board for  
4 the legal procedures.

5 Q So you cease and desist is basically a request to stop the  
6 activity; and, if they don't stop it, then the authority to  
7 enforce it would be at the national level.

8 A But it's a little bit more than just me calling someone up  
9 and saying don't do this or even writing a letter. I have  
10 authority on the enforcement side to issue cease and desist  
11 letters.

12 Q If you have authority on the enforcement side, and you issue  
13 one of those letters, and the unit or the member says we're  
14 going to continue to do what you're objecting to, what can you  
15 at the state level do to that person?

16 A I can certainly, as it relates to the membership, side I can  
17 file the complaint with the national office that goes to the  
18 board. But, if they're doing something illegal, I can call up  
19 the local sheriff and have somebody arrested.

20 Q I understand that, and we'd all have that obligation to do.  
21 But I'm talking about with your hat on as the local conference  
22 president, you have no direct authority to enforce your cease  
23 and desist order, except to go to national with a  
24 recommendation?

25 A We have an organization. We have a board of directors. We

1 have a process that's in place. And, in accordance with the  
2 process, we have to do it that way. I'm not an demigaurd to go  
3 and shut anybody down.

4 Q Don't misunderstand me, I'm just trying to understand the  
5 process. We're not arguing about whose got what authority and  
6 whether it's right or wrong. I'm just trying to understand what  
7 the relationship is functionally and operationally between the  
8 state conference and the local units. Fair enough. And the  
9 national units --

10 A Yeah. I'm going to say NAACP is a very complex  
11 organization. I always say that's why it's probably been around  
12 since 1909. And the reason why I wanted to make sure that you  
13 guys got a copy of the constitution and bylaws, because, on the  
14 board of directors, I'm still trying to understand the bylaws  
15 and the constitution.

16 Q I hear you.

17 Couple of other questions about some comments that  
18 you made. I think you commented a minute ago that all units are  
19 required to attend the state convention. Is that a provision in  
20 their charter that's issued by the national organization, or  
21 where is that requirement come from?

22 A In the bylaws.

23 Q In the bylaws of the --

24 A And probably -- I don't know whether the charters -- I  
25 haven't seen the charters. But, in the bylaws, there's

1 requirement that all the units within the state attend national  
2 conventions and state conventions.

3 Q It's in the bylaws of the national organization?

4 A The national organization has what we call a constitution.

5 And then we have, for the local units, what we  
6 call bylaws.

7 Q Okay. So local unit bylaws?

8 A Yes.

9 Q Got you.

10 And is there a consequence if a unit just doesn't  
11 go to the state convention?

12 A Well, there's always consequences.

13 Q What would the consequence be as your understanding of  
14 either the constitution at national or the bylaws at local?

15 A Could be suspension. Could be revocation of the charter.  
16 For individuals, it could be suspension. It could be expelling  
17 out of the units.

18 Q But it would be as a result of a violation of either the  
19 national constitution or the local unit's bylaws; true? In if  
20 they failed to attend a state convention?

21 MR. HO: I'm going to object here, Your Honor. If we  
22 need the bylaws in evidence, the defendants have them, they can  
23 offer them into evidence. The best evidence Rule 1001, we can  
24 just put them in.

25 THE COURT: I think it's time to move on. Sustained.

1 BY MR. PHILIPS:

2 Q Few other questions for you, Mr. Johnson.

3 You mentioned voter registration specifically, and  
4 I wrote that down as one kind of the purposes of the  
5 organization as one of the functions that's consistent with the  
6 purposes. Did I get that part right?

7 A Yes.

8 Q Can you tell me specifically whether the state conference  
9 has sponsored or conducted -- and I know we're going to hear  
10 about this from Reverend Taylor later -- but sponsored or  
11 conducted any voter registration drives that you can remember  
12 and tell me about?

13 A Well, again, those years that Reverend Taylor was appointed  
14 to be over those drives, I think he can say that. I just I  
15 would be afraid to try to zero in on whatever the exact dates  
16 were.

17 Q And I really wasn't asking you for that. Put aside what  
18 Reverend Taylor is going to tell us. Do you have a recollection  
19 of other voter registration drives that the state conference  
20 sponsored, conducted?

21 A Not exactly.

22 Q And, when the state conference elects to do that, to conduct  
23 a voter registration drive, what's the source of the funding  
24 that you use to engage in that particular activity? Where do  
25 you get the money to do that with?



1 A The monies that we've gotten in the past have come from the  
2 national office. Other than that, there's volunteers doing it.  
3 We've -- you know, I can recall many years ago, I had a  
4 state-wide radio program. I got the PSAs, public service  
5 announcements, to cut radio programs. I do that on a regular  
6 basis. So most of activities from our standpoint, NAACP  
7 Louisiana, is volunteer work.

8 Q Through the locals?

9 A Through locals. Me as a state conference president, I'm a  
10 member of the branch. So everything's interrelated. But it's  
11 through people. I will just say it that way, it's through  
12 people.

13 Q Do the funds that would flow from the national office would  
14 come to the state conference and then be distributed to the  
15 local units to carry out a voter registration drive, or not?

16 A Reverend Taylor is over the implementation of those dollars.  
17 When I assign him to that particular responsibility, you know, I  
18 trust that he is doing whatever he needs to do as far as his  
19 plan, his plan and proving his plan is done directly with the --

20 Q I'll just write that question down and ask him; fair enough?

21 A Okay.

22 MR. PHILIPS: Judge, if I could have 30 seconds to ask  
23 my colleagues --

24 THE COURT: Sure.

25 MR. PHILIPS: Once again, Dr. Johnson, I'm told I have

1 no further questions.

2 Thank you, Your Honor.

3 THE COURT: Thank you.

4 Mr. Ho: This will be very brief.

5 REDIRECT EXAMINATION

6 BY MR. HO:

7 Q Three topics I want to hit really quickly. One, you talked  
8 about the state convention and receiving some materials about  
9 the voting for that. Were those voter education materials?

10 A Voter education materials.

11 Q Sorry, just wanted to make sure I had that right.

12 Second question. You talked about being on a  
13 board of directors. Which board of directors were you referring  
14 to?

15 A The board of directors of the national association for  
16 advancement of --

17 MS. CANGELOSI: Objection, Your Honor. Leading.

18 (Sidebar conference.)

19 THE COURT: You are leading the witness.

20 If you would have just said leading, I would have  
21 said sustained.

22 MR. HO: I apologize.

23 THE COURT: I hate when these young lawyers come in for  
24 conference and say rule such and such.

25 MR. PHILIPS: Stand up and tell me the rule number and

1 don't say anything else.

2 THE COURT: Come up here, let me look up it.

3 You were leading. I knew that. Sustained.

4 BY MR. HO:

5 Q Were the materials that you got at the state conference  
6 related to voting?

7 A Materials? Sometimes we'll have the voter registration  
8 cards that we hand out.

9 Q Anything else?

10 A I can't think of anything right now.

11 Q And then I asked about a board of directors. Which board  
12 are you on?

13 A The board that I referred to in this testimony is the  
14 National Board of Directors of the NAACP.

15 Q Mr. Philips asked you a hypothetical question about the  
16 people in Alexandria. Can the local conference recruit the  
17 people in Alexandria to conduct voter registration work?

18 A Yes.

19 Q Can you recruit individual members --

20 MS. CANGELOSI: Objection, Your Honor. It's leading.

21 THE COURT: Overruled.

22 BY MR. HO:

23 Q Let me finish the question. Can you recruit individual  
24 members?

25 A Yes.

1 MR. HO: Those are all the questions.

2 THE COURT: I just have a couple.

3 Who runs the convention? The annual convention  
4 you have, who puts that on?

5 THE WITNESS: The local NAACP unit president would be  
6 the convention coordinator. Like we were in --

7 THE COURT: Which local?

8 THE WITNESS: If we were in Lafayette, then it would be  
9 the Lafayette. If we were in Ferriday, it would be the  
10 Ferriday. If we in New Orleans, it would be the New Orleans  
11 branch.

12 THE COURT: Who determines where the conference will  
13 be?

14 THE WITNESS: At the convention, we have a Time and  
15 Place Committee that receives the request from the different  
16 local units as to they would like to have it in their area.  
17 Because one of the purposes for having it an area is to build up  
18 memberships and build up support to the local units. So the  
19 local units try to get the convention to come. So it comes to  
20 us as a body in a meeting. We approve the location for the next  
21 year.

22 THE COURT: Who is we?

23 THE WITNESS: We would be the Executive Committee of  
24 the state conference. That would be all the officers, all of  
25 the chair persons, chair persons of the standing committees.

1 And presidents of all the local units make up the Executive  
2 Committee. Others, and the delegates, too. Because, at the  
3 convention, each unit is entitled a certain number of delegates.  
4 So the delegates would be in attendance at the convention.

5 THE COURT: Right.

6 When you receive the information from the legal  
7 defense fund that we talked about that you sometimes get,  
8 educational material or voter registration forms, to whom --  
9 where are those documents sent? To whom?

10 THE WITNESS: Well, they're given to individuals who  
11 are in attendance at the convention who are, quote, unquote, the  
12 delegates who should be coming from all the different units, and  
13 they are to take them back.

14 THE COURT: I think you're missing a step. At some  
15 point, a box is delivered.

16 THE WITNESS: Yes.

17 THE COURT: With this information.

18 THE WITNESS: Right.

19 THE COURT: To whom is the box delivered?

20 THE WITNESS: To me. Basically, everything comes to  
21 me.

22 THE COURT: And then you bring that box to the  
23 convention site.

24 THE WITNESS: Right.

25 THE COURT: And it's distributed from there.

1 THE WITNESS: Yeah. Done in the workshops.

2 THE COURT: All right.

3 Does anybody have any questions, just based upon  
4 those couple of questions I asked?

5 MR. HO: No, Your Honor.

6 MR. PHILIPS: No, Your Honor.

7 THE COURT: All right. We're going to break for lunch.  
8 It's 12:30. Court will be in recess until 2:00 o'clock.

9 (12:30 p.m., proceedings recessed for lunch.)

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1 AFTERNOON SESSION

2 2:00 P.M.

3 THE COURT: Mr. Ho.

4 MR. HO: Your Honor, as our next witness, the  
5 plaintiffs call Edward Taylor.

6 THE COURT: Come forward, Reverend Taylor.

7 EDWARD TAYLOR, being duly sworn, testified as  
8 follows:

9 THE COURT: Mr. Taylor, I'm going to ask you to say  
10 your name and spell it, please, for the court reporter.

11 THE WITNESS: Yes, ma'am. Edward Chipps Taylor, III.

12 THE COURT: Could you spell your name for the record,  
13 please.

14 THE WITNESS: E-D-W-A-R-D, capital C-H-I-P-P-S,  
15 T-A-Y-L-O-R, III.

16 THE COURT: Please proceed.

17 MR. HO: Thank you, Your Honor.

18 DIRECT EXAMINATION

19 BY MR. HO:

20 Q Good afternoon, Reverend Taylor.

21 A Good afternoon, Mr. Ho.

22 Q How are you?

23 A A little hot, but I'm okay. Thank you.

24 Q Reverend Taylor, you're here to testify today about the  
25 Louisiana NAACP's voter registration activities?

1 A That is correct.

2 Q Before we get to that, just want to ask you a few background  
3 questions about yourself.

4 How old are you?

5 A 59 years old.

6 Q And where do you live?

7 A In Hammond, Louisiana.

8 Q Which parish is that in?

9 A Tangipahoa.

10 Q And what do you do for a living?

11 A I work for the capital fund, for the Louisiana Development  
12 Corporation Capital Fund.

13 Q And what do you do?

14 A I am an analyst.

15 Q What does that entail?

16 A Basically, when money was given out in 2010 after Katrina to  
17 different property owners, my job is to locate these properties,  
18 see what has been done with these properties as far as what type  
19 of repair has been made on these properties, and help them get  
20 to a position where they can receive their COO, or rent out the  
21 properties.

22 Q COO, what is a COO?

23 A Certificate of occupancy.

24 Q And how long have you been doing that?

25 A I started in February.



1 Q And what were you doing immediately prior to that?

2 A I worked for Achievement Academy, which is a tutorial  
3 program for young folks who are having trouble in school as far  
4 as failing grades and things of that nature.

5 Q And what exactly did you do for that program?

6 A I was the director of the program.

7 Q And how long were you doing that?

8 A Basically, on and off, for about five years.

9 Q How did you come to do that work?

10 A A friend of mine who is the president of the Baton Rouge  
11 branch wanted to expand down into the Tangipahoa area, and I was  
12 blessed to have some contacts with our superintendent. So, we  
13 talked, and he thought it was a good idea, and he allowed us the  
14 opportunity to come into Tangipahoa. And I was appointed as the  
15 director of the program.

16 Q And are you a reverend?

17 A Yes, I am.

18 Q And where are you a reverend?

19 A I am at, in Baton Rouge, Louisiana, at it's called Morning  
20 Star Full Gospel Baptist Church, where my pastor is Bishop  
21 Gregory Cooper, Senior.

22 Q How long have you been there?

23 A I've been there almost two years now.

24 Q What does that entail?

25 A I am basically one of the associate elders at the church,

1 and we're responsible for taking care of -- we do preaching at  
2 times, we make sure that the service on Sunday runs properly.  
3 Whether it's the praise and worship or the prayer. We basically  
4 do what the pastor instructs us to do.

5 Q And how did you come to be a reverend?

6 A I was called from God. I received the call back in 1996.  
7 I've been preaching going on 17 years now.

8 Q And are you affiliated with any civic organizations here in  
9 Louisiana?

10 A Yes, I am.

11 Q Which ones?

12 A I belong to the NAACP. I'm a member of the Martin Luther  
13 King Committee. As well as I work with the June Teenth  
14 Committee.

15 Q What are those two last things, very briefly?

16 A June Teenth Committee is a committee set up to celebrate  
17 June 19th, which was the actual day of independence that slaves  
18 were told about.

19 And the Martin Luther King Committee of course was  
20 set up to as far as getting a holiday for Dr. Martin Luther King  
21 in honor of his legacy.

22 Q Tell us about your involvement with the Louisiana State  
23 Conference of the NAACP.

24 A I've been involved with the Louisiana State Conference for  
25 over 15 years. I'm a member of the Baton Rouge branch NAACP as

1 well as the New Orleans branch NAACP.

2 Q And how did you come to be involved with the Louisiana State  
3 Conference of the NAACP?

4 A Well, I've been a member of the NAACP for over 35 years.  
5 So, when I moved here over 16 years ago, it was just natural  
6 that, once I became a member of the branch, local branch, that I  
7 would become part of the Louisiana State Conference.

8 Q Was there ever a time when you said that, in a written  
9 statement, that you said that you had been a member of the  
10 Louisiana State Conference for a longer period of time than what  
11 you just told us?

12 A No, I did not. The statement, I had given the information  
13 to my attorneys as far as how many years I had been a member of  
14 the NAACP as well as how many years I've been the Louisiana  
15 State Conference. In my statement, it was not correctly put  
16 down.

17 It stated in my statement, I believe, that I had  
18 been a member of the Louisiana State Conference for over 35  
19 years.

20 Q When did you notice that misstatement?

21 A To be very truthful with you, Mr. Ho, I was sent the --  
22 what's it called -- that I signed. Excuse me. I get  
23 tongue-tied sometimes. But, my statement that I made, I was  
24 told by my attorneys to review my statement because we're  
25 getting ready to do a deposition. So, as I reviewed the

1 statement that evening, I noticed that it was incorrect, that it  
2 stated that I had been a member of the Louisiana State  
3 Conference for over 35 years.

4 That next day when I met with my attorneys, I  
5 informed them that that statement was inaccurate --

6 Q I'm just going to stop you there.

7 THE COURT: We need to stop, Reverend Taylor.

8 Any conversations you've had with your attorney  
9 are privileged communications.

10 THE WITNESS: Yes, ma'am. I apologize.

11 BY MR. HO:

12 Q What should it have said?

13 A It should have said that I was a member of the NAACP  
14 national for over 35 years, and that I was a member of the  
15 Louisiana State Conference for over 15 years.

16 Q Do you have any official role with the Louisiana State  
17 Conference of the NAACP?

18 A Yes. I served -- for the last 15 years, I've served as a  
19 religious affairs chairman of the Louisiana State Conference, as  
20 well as I've served as the membership chairman.

21 Q Do you have any other kinds of roles other than those two  
22 roles?

23 A Official titles?

24 Q No. Unofficial.

25 A I work with vote -- To Go Get Out the Vote campaign with the

1 Louisiana State Conference.

2 Q Anything else?

3 A I serve at the pleasure of my president. Whatever he needs  
4 done, Reverend Taylor does his best to get it done.

5 Q Tell us some of your responsibilities as a religious  
6 affairs --

7 MS. CANGELOSI: Objection, Your Honor. This is  
8 interesting, but I don't know the relevance of the religious  
9 affairs.

10 THE COURT: Is this going to tie back in to? Let's see  
11 if we can get the tie going.

12 MR. HO: I'll keep it real quick.

13 BY MR. HO:

14 Q Just tell us about some of the your responsibilities.

15 A Communication with the local churches. Build a relationship  
16 with them and the NAACP.

17 Q Any connection between that and your work in voting?

18 A Of course. I was able to set up a lot of registration, do a  
19 lot of voting type activities at my churches.

20 Q Let's talk about some of that voting activity. Just, in a  
21 general way -- and we'll talk about specific things in a  
22 moment -- what were some of your responsibilities with respect  
23 to the voting for Louisiana State Conference of the NAACP?

24 A I was responsible for training, helping training individuals  
25 when it came to Get Out to Vote campaign. I was responsible for

1 getting with branches and helping them set up telephone banking,  
2 to set up canvassing as well as self-registration.

3 Q How long have you been involved in that voting related work  
4 with the Louisiana State Conference of the NAACP?

5 A My first encounter was in the year 2000. And I was the  
6 religious affairs director for the program at that time.

7 Q Are you familiar with the term civic engagement?

8 A Yes, I am.

9 Q What does that term mean in the context of the Louisiana  
10 State Conference of the NAACP?

11 A Civic Engagement department was enacted in the year 2008 to  
12 get the vote out, help get the vote out, to deal with things  
13 that dealt with the community, to get us actively involved and  
14 engaged.

15 Q When you say enacted, who was it enacted by?

16 A Well, Mr. Kirk Clay was the director of Civic Engagement at  
17 the NAACP national office.

18 Q Okay. Is voting the only thing that Civic Engagement  
19 entails?

20 A No, sir.

21 MS. CANGELOSI: Your Honor, I don't know how he can  
22 speak to what the national office does. This is something  
23 that's set up by the national office, he's testified to, and  
24 what Mr. Clay did. And, who Mr. Clay is, I don't know. We're  
25 talking about the Louisiana State Conference.

1 THE COURT: I know.

2 I'm going to overrule the objection and allow him  
3 to testify as to what he knows.

4 BY MR. HO:

5 Q Let me back up, Reverend Taylor.

6 Did the state conference of the NAACP ever come to  
7 be involved in the civil engagement work that we were talking  
8 about a moment ago?

9 A Yes, sir. In the year 2008 is when it started.

10 Q Has Civic Engagement work been limited only to voting?

11 A No, it has not.

12 Q What other kinds of things does it entail?

13 A It deals with education, it deals with housing, it deals  
14 with events that effect the community. Voting is just one part  
15 of it.

16 Q Did you ever come to do any work around the census in 2010?

17 A In 2000, we did work with the census.

18 Q Was that part of the Civic Engagement work we've been  
19 talking about?

20 A That's how I originally started working with the civic  
21 engagement, was with the census.

22 Q Let me ask you about voting and the voting related work  
23 that's within Civic Engagement. Can you tell me about what that  
24 exactly entails.

25 A Basically --

1 MS. CANGELOSI: Objection, Your Honor. Are we talking  
2 about the Louisiana state NAACP or Civic Engagement of the  
3 national office, I don't know.

4 THE COURT: Why don't you lay a foundation.

5 BY MR. HO:

6 Q The state conferences voting related work, can you tell me  
7 about it generally? And then we'll talk about specific aspects  
8 of it.

9 A Yes, sir. With the Louisiana State Conference, we have a  
10 program entitled GOTV, which is Get Out to Vote. It is  
11 three-pronged. You start off with registration. Then you have  
12 education. And then you have mobilization.

13 Q Why does the Louisiana State Conference of the NAACP engage  
14 in this kind of work?

15 A Because we feel it's very important that citizens are  
16 registered to vote, and vote.

17 Q Let's just talk about that piece. The first piece you  
18 talked about, registering to vote. Who does the Louisiana State  
19 Conference of the NAACP try to register to vote?

20 A Anyone who is not a registered voter. However, we  
21 concentrate on the -- I guess the correct terminology would be  
22 those, the poor, the individuals of African-Americans.

23 Q As far as you know, how long has the Louisiana State  
24 Conference of the NAACP been engaged in work around voting?

25 A Since I've been here. And I can only speak for the last 15,



1 16 years.

2 Q And how long have you been engaged in that work, yourself,  
3 personally?

4 A Since the year 2000.

5 Q Have you been engaged in that work every year since then?

6 A We did 2000, 2004, 2008, 9 and 10.

7 Q Have you personally attempted to assist people to register  
8 to vote?

9 A Yes, I have.

10 Q And have you assisted people?

11 A Yes, I have.

12 Q And how many people would you say you have personally  
13 assisted in register to vote over the years?

14 MS. CANGELOSI: Objection, Your Honor. What he  
15 personally did is not relevant, and what the Louisiana State  
16 Conference did would be. What he personally did is not  
17 relevant.

18 MR. HO: I can rephrase.

19 THE COURT: Yeah, let's just rephrase it.

20 BY MR. HO:

21 Q In your work with the Louisiana State Conference of the  
22 NAACP around voting, how many people have you personally  
23 assisted in registering to vote?

24 A Since the year 2000, I would say over a thousand people.

25 Q Do you have any documents that reflect the number of people

1 that you personally have assisted in registering to vote?

2 A No, I do not.

3 Q And why not?

4 A Basically, it's against the law in the state of Louisiana to  
5 keep or make copies of registration forms.

6 Q But you don't try to keep track of that information in any  
7 other way?

8 A No, sir.

9 Q Why not?

10 A It's really not important to me to keep people's names and  
11 who they are. It's more important to me to get them registered  
12 so they can vote.

13 Q So, if you don't have any documents, what do you base your  
14 estimate of a thousand people that you've registered -- you've  
15 assisted in registering to vote on?

16 A Just my numbers as far as getting out to register people.  
17 Knowing that, on a certain day, I may register 20 people. Over  
18 a period of ten years, you know, you can kind of count up in  
19 your mind how many people you've come in contact with.

20 Q I want to now ask you some more specific questions about  
21 really how the Louisiana State Conference of the NAACP engages  
22 in voting work, and let's stick with registration specifically.  
23 How does the Louisiana State Conference of the NAACP go about  
24 trying to help people register to vote?

25 A Well, there are different ways. We have telephone banking

1 or telemarketing. We have canvassing. And then we also have  
2 where you set up registration tables at different places or  
3 events.

4 Q Let's talk about each of those three things in order.

5 You referred to telephone banking.

6 A Correct.

7 Q What exactly does that mean?

8 A You set up an office at a location -- where it used to be,  
9 Your Honor, years ago, we'd go to an office, like a lawyer's  
10 office or things of that nature, that had a lot of phones. So,  
11 therefore, you would have different lines. And you would set up  
12 the different lines, and you would get people on the phone, give  
13 them a script, get the names and then have them call.

14 As we've progressed with modern technology, we now  
15 purchase cellphones a lot of times. And, that way, you're not  
16 confined to just being in a certain location.

17 And then you still do the same thing, though. You  
18 have a list of names, and you call people off of a script to see  
19 if you can get them to vote, to register to vote.

20 Q Where does that list of names come from?

21 A At one point, we got the list of names from the secretary of  
22 state office.

23 But then, again, going back to modern technology,  
24 we now have a system called the Van system, which has been  
25 provided to us through the national office of the NAACP.

1 Q And what is --

2 THE COURT: Is that, the list you got from the  
3 Secretary of State's Office, was that for the Get Out To Vote  
4 effort to actually vote? Not to register?

5 THE WITNESS: These were the lists that we would get  
6 from them with people who were supposed to be registered voters.

7 THE COURT: Okay. So you're getting out the vote at  
8 this time.

9 THE WITNESS: Yes.

10 And then you would call, and sometimes you would  
11 find that they were still registered. Sometimes you'd find that  
12 they had moved and were not registered anymore.

13 THE COURT: Okay. Thank you. I'm sorry.

14 MR. HO: Thank you, Your Honor, for the clarification.

15 BY MR. HO:

16 Q You mentioned the Van system. What exactly is that?

17 A The Van system is the system, a computerized system, set up  
18 that again has the same premise, it has names of people who are  
19 supposedly registered voters, addresses. Also gives you  
20 information on how often they vote and what area they live in.

21 Q So, when you call these people, what do you say?

22 A Usually follow a script. First thing you should do is a  
23 good tell marketer introduces himself to let the people know  
24 that he's not a bill collector. Okay? And then, you know, ask  
25 them if they are a registered voter. And, if they tell you that

1 they are registered, you simply, you know, ask them -- a lot of  
2 times: Well, when was the last time you voted, to make sure  
3 that they were still active. And encourage them to get out and  
4 vote. And, a lot of times, even ask them if they need a ride to  
5 the polls.

6 Q You said in response to Judge Milazzo's question, you would  
7 ask these people if they were still registered at their current  
8 address. Right?

9 A Correct.

10 Q What would you do if they said they weren't?

11 A Then you would ask them if they were interested in  
12 registering.

13 Q Then what?

14 A If they say yes, they are, then you would simply ask them do  
15 you want us to bring a registration card to you, would you like  
16 us to put one in the mail or do you realize that you can go to a  
17 certain location and register to vote.

18 Q Have you ever done that, actually brought a voter  
19 registration form to someone after a phone call?

20 A Yes, I have.

21 Q Let's move away from the phone banking. I think the next  
22 thing you talked about was canvassing?

23 A Correct.

24 Q What does that entail?

25 A Canvassing is when you receive material about the importance

1 of registering to vote, it usually has the date on it, when the  
2 registration closes and it lists information to encourage people  
3 to vote and gives them education about voting.

4 Q And how do you choose where to conduct canvassing?

5 A I personally like to choose areas where you have a large  
6 inflection of people, a lot of people coming in and out, like a  
7 Walmart. I also love churches. Being a preacher, I have access  
8 to a lot of churches. So I like to go there and set up my  
9 registration.

10 Q You also mentioned registration tables?

11 A Correct.

12 Q What does that entail?

13 A Basically, for example, if someone is doing an event for  
14 example here in New Orleans, the June 2nd celebration, you would  
15 go and you would get with whoever's in charge, and you would ask  
16 them if it was okay to set up a registration table at that  
17 event. You'd set up a table, you'd have registration cards,  
18 maybe some signs encouraging people to register.

19 Q When you do that kind of activity, do you always have a  
20 physical table?

21 A No. Because, for example, if you're outside of a Walmart or  
22 you're outside of an office or some place that you're  
23 registering people, a lot of times just have a clipboard and the  
24 registration cards.

25 Q How do you choose -- you mentioned a little bit about how

1 you chose a place, but my question's a little more general than  
2 that. How do you choose within an area before you choose a  
3 place that you want to go to?

4 A Well, again, we want to concentrate on the lower income  
5 community. Because we have found through research that the  
6 lower income community is the least likely to be registered.  
7 So, therefore, again, fertile ground. So that's one of the  
8 reasons why we concentrate on that.

9 Q And whose decision is that, to concentrate on those areas?

10 A Mine.

11 Q Do you have any documents to reflect that?

12 A No.

13 Q Why not?

14 A Never needed any.

15 Q Have you had any personal involvement in these kinds of  
16 direct outreach efforts for voter registration by the Louisiana  
17 State Conference of the NAACP?

18 A Yes, I have.

19 Q What have you done personally?

20 A I have gone out to different areas or different locations.  
21 I have been on the telephone phone banking. I've gone and stood  
22 out in front of places like Walmart or maybe a health unit or  
23 maybe a food stamp office or DMV office, places like that.

24 Q When you do this work yourself, how do you choose the  
25 specific place to do it?

1 A Based on, again, number of people that come in. And also  
2 based on what you hear -- where people are. The more people are  
3 there, especially if you're talking lower income individuals, if  
4 it's in the inner city -- for example, at my church, a lot of  
5 our churches are in the inner city, so therefore you don't have  
6 some people registered at the inner city churches that you do at  
7 some of your bigger churches, you know, further out.

8 Q Is there anyone at the Louisiana State Conference from whom  
9 you ask permission before choosing a specific location to do  
10 that work?

11 A All due respect, no.

12 Q When you chose a specific place to do that work, do you  
13 report those specific places to anyone at the Louisiana State  
14 Conference of the NAACP?

15 A No, I did not.

16 Q You gave some examples of different places where you've done  
17 this kind of work before. You mentioned churches. Is that  
18 connected to your role as religious affairs?

19 A Correct.

20 Q Fair to say that that's where you do the most of your work?

21 A That's correct.

22 MS. CANGELOSI: Your Honor, I'm just objecting.  
23 Leading.

24 THE COURT: Rephrase your question.

25 MR. HO: Yes, Your Honor. I apologize. Well taken.



1 BY MR. HO:

2 Q This direct voter registration work out in the community,  
3 where does most of it take place?

4 A At my churches.

5 Q Could you name a few specific churches where you've done  
6 that.

7 A I've done it at Mesodontia Baptist Church in Hammond,  
8 Louisiana. I've done it at Great Saint Stephens here in New  
9 Orleans. I have done it at Morning Star Full Gospel Church in  
10 Baton Rouge.

11 Q Let's talk about 2010. I think you mentioned that was one  
12 year in which you've been engaged in registration work. Did you  
13 personally do community outreach for voter registration on  
14 behalf of the Louisiana State Conference during 2010?

15 A Yes, I did.

16 Q And did you do it the entire year, or certain parts of the  
17 year?

18 A Normally, when you're dealing with -- and make sure I'm  
19 correct in hearing you, you're speaking of registration?

20 Q Yes. Registration specifically. I know there's other voter  
21 related activity.

22 A Normally, when you do registration, you want to concentrate  
23 on the last three months right before the deadline. So that's  
24 when you do your major push as far as registration is concerned.

25 Q And how often would you do that direct outreach during those

1 last three months?

2 A You speaking of me personally?

3 Q Yes.

4 A I would be out there every week at different locations,  
5 though.

6 Q How often would you be at churches?

7 A My churches, I did at least once a week. I tried to do them  
8 on every Sunday or on Bible study night.

9 Q What night of the week is that?

10 A Some are Tuesday, some are Thursday. Depends on your  
11 church.

12 Q Forgive my ignorance on that.

13 What places other than churches in 2010 did you do  
14 that kind of direct outreach?

15 A I went to -- again, I would do Walmarts. And I also do food  
16 stamps offices, health units. And did a few DMV offices.

17 Q Let's talk about the health unit. By health unit, you mean  
18 a place where people can apply for benefits, like WIC?

19 A That's correct.

20 Q Was 2010 the first time that you had done that?

21 A No. I actually started doing health units I want to say in  
22 the year 2008.

23 Q And how did you come to perform voter registration work near  
24 a health unit?

25 A This may be kind of a lengthy answer, Your Honor. I do

1 apologize.

2 But it started in 2004. One of my workers, when  
3 we were working our program, we were required to get so many  
4 registrations on our program at that point. The individual did  
5 not have transportation that day to get to one of the -- we used  
6 apartment complexes as well. So they weren't able to get to  
7 their apartment complex. So they called and they asked -- they  
8 said: Well, look, I live down the street from a health unit, do  
9 you have a problem with me going with my clipboard and standing  
10 out in front of the health unit? I says: No, as long as you go  
11 and do your two to four hours, that's fine. And they did.

12 Well, when we got back together and discussed  
13 numbers, we found that the numbers that they did was higher than  
14 the other people who had went to the apartment complexes, or  
15 even to the Walmart at that time.

16 Q Do you remember ever describing this event on another  
17 occasion?

18 A Yes. I believe, when I gave my deposition, I believe it was  
19 discussed.

20 Q And what did you say about it during your deposition?

21 A Basically, the same thing.

22 MR. HO: I'll rephrase.

23 THE COURT: Rephrase your question.

24 BY MR. HO:

25 Q Did you discuss the year in which these events came up? Do

1 you remember discussing the year in which these events came up,  
2 if ever?

3 A When I remembered, again, I'd done this so much that my  
4 years sometime run together and I don't remember correct years.  
5 And I think I may have said in my deposition that it was 2004 or  
6 2008 when this incident happened. But, after thinking about it,  
7 I realized that it was actually in 2004 that it originally  
8 started.

9 Q Let's come back to 2010. How often would you say you were  
10 outside of a health unit doing this kind of outreach?

11 MR. PHILIPS: Your Honor, can we approach for just a  
12 moment?

13 THE COURT: Sure.

14 (Sidebar conference.)

15 MR. PHILIPS: I'm not sure where he's going in  
16 reference to this witness's testimony; but 2004 is an awful long  
17 way to go back with respect to this.

18 MR. HO: It's not offered for violations. Only to  
19 establish his background.

20 MR. PHILIPS: I hear you, I hear you. But we could go  
21 back an awful long way, and it would be irrelevant to the  
22 standing issue we're talking about.

23 MR. HO: No dispute on that.

24 THE COURT: Let's move it up. I think it's important  
25 to get a context of how it ended up, and I think now it was

1 relevant for that purpose.

2 MS. CANGELOSI: So what purpose are we talking about?

3 THE COURT: 2008, 2009, 2010.

4 MR. HO: Almost all my questions are going to be about  
5 2010.

6 MR. PHILIPS: So that's where we're going.

7 (Sidebar concluded.)

8 BY MR. HO:

9 Q Thank you for your patience, Reverend Taylor.

10 I want to come back to 2010. How often would you  
11 say during that three month period OF voter registration  
12 outreach would you say you were outside of the health unit?

13 MS. CANGELOSI: I couldn't hear the question.

14 THE COURT: Would you just please repeat your question?

15 MR. HO: Sure.

16 BY MR. HO:

17 Q Back to 2010, how often during that three month period of  
18 voter registration outreach work that you were doing, how often  
19 were you -- would you say you were outside of a health unit  
20 doing this kind of work?

21 A Probably once a month.

22 Q Over a few --

23 A In that three month period or that three month window that  
24 we speak about.

25 Q And where is the health unit?

1 A The health unit is located in Hammond, Louisiana.

2 Q What kind of work, what did you do?

3 A I didn't understand your question.

4 Q How did it work? How does it work when you're out there?

5 A Well, first of all, with a day like today, it's hot. So you  
6 go out with water. You have take your clipboard, take some  
7 registration cards. And you would greet people normally as they  
8 walked out and ask them if they were registered to vote. If  
9 they weren't, you'd register them on the spot. If some people  
10 said no, not right now, you'll take a card so you give them a  
11 card.

12 Q Did you personally on any of these occasions assist people  
13 in registering to vote?

14 A Yes, I did.

15 Q Most of the people you talked to, were most of them already  
16 registered?

17 A No. They were not.

18 Q What would you do if they had been?

19 A If they had been, I would not have stayed out there and  
20 continued. Because, again, my mission was to deal with as many  
21 unregistered voters as possible to sign them up. So, if they  
22 were registered, I would not continue to stay out there.

23 Q Let's shift away from the health unit, let's talk about the  
24 food stamps office.

25 MS. CANGELOSI: Objection. I thought he said he was at

1 a WIC office and now he's at food stamps office.

2 THE COURT: Overruled. He mentioned that this is one  
3 of places that he performed these activities.

4 BY MR. HO:

5 Q Did you perform these activities outside of a food stamps  
6 office in 2010?

7 A Yes, I did.

8 Q Was that the first time you had done that?

9 A No. Again, we started dealing with food stamps offices,  
10 health unit and DMVs back in 2008.

11 Q And how did you come to do -- I mean, you've explained about  
12 health units. How did you come to do this work outside of food  
13 stamp offices?

14 A Because we had found out that it was a requirement of the  
15 state to register people when they came into these offices.  
16 These were poor people. Again, my focus was poor people. So,  
17 therefore, if they were not being registered, then I wanted to  
18 make sure that they got registered.

19 Q Let's talk about 2010. And, again, let's talk about that  
20 three month period in which you were doing your voter  
21 registration outreach. About how often would you say you were  
22 outside of a food stamps office?

23 A I tried to do, again, the food stamps at least once a month  
24 during that three month period.

25 Q And where is it again?

1 A The food stamps office is in Amite, Louisiana. Amite City.

2 Q And, when you're there, about how long are you there?

3 A Anywhere from two to four hours.

4 Q And, in 2010, did you actually assist people in registering  
5 to vote outside the food stamps office?

6 A Yes, I did.

7 Q Was your procedure for doing that any different than outside  
8 the health unit?

9 A No, sir.

10 Q The people that assisted -- let me take that back.

11 The people that you spoke to, were most of them  
12 already registered to vote?

13 A No, sir, they were not.

14 Q And what would you have done if they had been?

15 A Again, I would have thought it was a waste of time, so I  
16 would have found another location to set up registration.

17 Q What about DMVs, you mentioned DMVs.

18 A Well, I must give the state credit on DMVs, because I did  
19 stand outside a DMV office and I found that there were not so  
20 many individuals coming out of the DMV office who were not  
21 registered as it was other locations. So I only did that maybe  
22 a couple of times, and I did not go back.

23 Q Let's stay on the year 2010, and I want to show you some  
24 documents.

25 MR. HO: Permission to approach, Your Honor?



1 THE COURT: Yes, you may.

2 BY MR. HO:

3 Q That is a binder with some documents, Reverend Taylor, and I  
4 want to draw your attention to Exhibit 238, which is tab No. 2  
5 in your binder. When you're ready, flip through this document,  
6 I know there are a lot of pages. But, whenever you are ready,  
7 just let me know.

8 (Pause in proceedings.)

9 THE WITNESS: Okay. Yes, sir.

10 BY MR. HO:

11 Q Are you familiar with this document?

12 A Yes, I am.

13 Q What is it?

14 A It is what we call the Civic Engagement tool kit.

15 Q And how did you come to receive this document?

16 A It was sent to me by Mr. Kirk Clay.

17 Q And where does he work?

18 A He is the National Civic Engagement -- or he was the  
19 National Civic Engagement director for the headquarters NAACP.

20 Q Could you turn one page to the page that's marked LA NAACP  
21 0070.

22 MS. CANGELOSI: Your Honor, I object to -- it's  
23 hearsay.

24 THE COURT: Let's approach.

25 (Sidebar conference.)

1 THE COURT: He hasn't asked him a question about it. I  
2 know the document itself is hearsay.

3 MS. CANGELOSI: Look on the page, I guess he's going to  
4 read from it, but it's hearsay.

5 THE COURT: I don't know.

6 What are you going do with it?

7 MR. HO: I was going to note the date of it and ask him  
8 what he used it for. And, if he engaged in any of the  
9 activities mentioned in it, how he used it. It's just like the  
10 manuals. The defendants have their own manuals into evidence.

11 THE COURT: Overruled, until he does something.

12 BY MR. HO:

13 Q Reverend Taylor, what's the date on this document?

14 A April 10, 2010.

15 Q Do you remember when you received that document?

16 A Around that time, the first part of April.

17 Q Did you use this document in any way?

18 A Yes. We set up our Civic Engagement activity around this  
19 document.

20 Q When you say we, who do you mean by that?

21 A The Louisiana State Conference.

22 MR. HO: At this time, Your Honor, I'd like to offer  
23 plaintiff's Exhibit 238 into evidence.

24 MR. PHILIPS: I do have an objection to relevancy of  
25 this document, Your Honor. It may be in parts, but it's not

1 relevant to the issues that are being offered.

2 THE COURT: Is that the same?

3 MS. CANGELOSI: Yes, Your Honor. It's a very lengthy  
4 document that says a lot of things, and I don't know what he's  
5 talking about.

6 MR. HO: It's almost exclusively about the voting work  
7 that he's engaged in that he's been asked to testify about. The  
8 defendants have their own lengthy training manuals in the  
9 record. It's the same --

10 THE COURT: I'm going to overrule the objection in  
11 regard to those issues.

12 BY MR. HO:

13 Q I want to turn to page LA NAACP 0073. If you'd take a look  
14 at that page and let me know when you're ready.

15 THE WITNESS: Your Honor, is it okay if I use this  
16 screen that's sitting by me, too?

17 THE COURT: That's fine.

18 THE WITNESS: I can look at this, too?

19 THE COURT: You can look at any of the screens. Until  
20 I tell you you can't look at it, you can look at it.

21 THE WITNESS: Thank you, Your Honor.

22 BY MR. HO:

23 Q What is this, Reverend Taylor?

24 A It was the NAACP unit checklist for the 2010 civic  
25 engagement activities.

1 Q And how is it used?

2 A Basically, you check off things that you've done, you've  
3 accomplished, when you've done it.

4 Q Do you see a header that says Start?

5 A Yes.

6 Q Do you see the next header down that says April through  
7 September 2010?

8 A Yes, I do.

9 Q And what's the -- there are a number of checked boxes there.  
10 What does the fourth checked box down say?

11 A Register people to vote.

12 Q Did Louisiana State Conference of the NAACP do that in 2010?

13 A Yes, we did.

14 Q What's the next check box down?

15 A Host a voter registration civic engagement training.

16 Q Did the Louisiana State Conference of the NAACP do that in  
17 2010?

18 A Yes, we did.

19 Q Roughly, when did you do that?

20 A Well, we did a couple of trainings. The one in particular  
21 was done at our state conference by Mr. Kirk Clay, who again was  
22 the Civic Engagement director.

23 Q Let's turn a few pages over. It will come up on your screen  
24 if you prefer that. And it's Louisiana NAACP 0081. Take a look  
25 at it, let me know when you're ready.

1 A I'm familiar with it.

2 Q What is this?

3 A This is our, what we use for our phone banking. Basically,  
4 it's called a script, form of script.

5 Q And did the Louisiana State Conference of the NAACP use this  
6 script?

7 A Yes, we did.

8 Q How does it work?

9 A Basically, you would have individuals on the phone who were  
10 doing the phone banking, and you would provide them with a  
11 script so that they could stay on course to do what they were  
12 asked to do. Time was important.

13 Q And what's the first question you're supposed to ask,  
14 according to this script?

15 A Well, the first thing you do, again, as I stated before, you  
16 need to identify yourself to let to whoever you're speaking to  
17 know who you are. And why you're calling.

18 Q And what's the first question you're supposed to ask?

19 A First question is -- well, again, we do, when you ask the  
20 first question, you ask them: Are you registered to vote?

21 Q And is that the first question that phone bankers for the  
22 Louisiana State Conference for the NAACP would ask in using this  
23 script?

24 A Yes.

25 Q You personally?

1 A Yes.

2 Q Let's turn ahead to page Louisiana NAACP 0095. And it will  
3 be on your screen.

4 Do you see that there are three bullet points on  
5 that screen?

6 A Yes.

7 Q And do you see the second bullet?

8 A Yes.

9 Q And what does it say?

10 A It says: Subcommittee on voter registration and voter  
11 turnout, this subcommittee is responsible for development of  
12 projects and strategies to get individuals registered, to the  
13 polls on election day. The four basic features to getting  
14 people to register to vote are door-to-door canvassing,  
15 telephoning, direct mail and web 2.8 technology including text  
16 messaging.

17 Q In 2010, did the Louisiana State Conference of the NAACP  
18 engage in any of those activities?

19 A We engaged in at least two of them.

20 Q Which ones?

21 A Door-to-door canvassing and telephoning.

22 Q No direct mail?

23 A Budget would not allow.

24 Q What about web -- I'm not even sure what it means, web 2.0  
25 technology including text messages.

1 A Sir, you've been to college for many years, and you don't  
2 understand. So, I wasn't messing with it; okay? I left it  
3 alone.

4 Q Okay. Let's look at another document. This is plaintiff's  
5 Exhibit 239. It will be on your screen. And it's a tab No. 3  
6 in the binder. Take a few moments to look at it and let me know  
7 when you are ready.

8 A Okay.

9 Q What is this?

10 A This is your voter mobilization toolbox for phone banking  
11 for 2008, 120.

12 Q Are you familiar with this document?

13 A Yes, I am.

14 Q How do you come to receive this document?

15 A Again, I was sent this document as well from Mr. Kirk Clay  
16 at the NAACP national office.

17 Q And did you use this document in any way?

18 A Yes, we did.

19 Q And how?

20 A We basically set up what we were doing as far as our phone  
21 banking is concerned based on what was in the document.

22 MR. HO: At this time, Your Honor, I'd move to offer  
23 plaintiff's Exhibit 239 into evidence.

24 MS. CANGELOSI: Your Honor, the same objection as the  
25 prior document, but I also -- the last four pages of the

1 document are not part of the document itself. It's really hard  
2 when you never get an original document to know what's all  
3 enclosed in it. But it looks like the document, the first page  
4 is No. 1, and then it goes to page 34. And they're all the same  
5 format with borders around them, and then there's just four  
6 extraneous pieces of paper that I don't think are part of that  
7 document at any rate. It's four extraneous pages that are  
8 something else. Not part of the document in and of itself.

9 THE COURT: Mr. Ho -- and I think it starts on 698.

10 MR. HO: I'm not sure, Your Honor. Maybe I could ask  
11 the witness if he remembers that it's part of it.

12 MR. PHILIPS: Same objection and same observation as to  
13 the contents of the document.

14 THE COURT: I want to make sure, because it does look  
15 like we changed formats.

16 MR. HO: If it is different, then we won't move those  
17 last four pages.

18 BY MR. HO:

19 Q Reverend Taylor, can you turn to page 698 and look through  
20 those last four pages. Do those look to you like they're part  
21 of the voter mobilization toolbox?

22 A Are you talking about just --

23 Q 698, 699, 700 and 701.

24 A Mr. Ho, to be very truthful with you, I don't know. I don't  
25 know.



1 MR. HO: So we'd amend the exhibit to exclude those  
2 four pages, Your Honor. And just the pages 1 through 34, Bates  
3 numbered LA-NAACP 664 through 697, and move to offer that into  
4 evidence as plaintiff's 239.

5 MS. CANGELOSI: We'd just renew our objection to the  
6 prior document as well. That satisfies that other objection.

7 THE COURT: Let it be admitted.

8 (Exhibit admitted.)

9 MR. HO: Thank you, Your Honor.

10 BY MR. HO:

11 Q Just want to ask you about one page in this document,  
12 Reverend Taylor. If you could turn to page 690. And it will be  
13 up on your screen.

14 Do you see a header that says Let's Do It Again,  
15 2010?

16 A Yes, sir.

17 Q And what's written under that?

18 A The Let's Do It Again 2010 campaign will work towards  
19 addressing the systematic issues of low voter turnout during  
20 mid-term elections. We will focus on first-time voters,  
21 infrequent voters or potential voters who also live in the  
22 census tract with a high unemployment rate.

23 Q What did that mean to you?

24 MS. CANGELOSI: Objection, Your Honor. What did it  
25 mean to him that someone else said? I don't know how he can

1 interpret someone's words.

2 MR. HO: I'm not asking him to interpret what the  
3 person meant, just what it meant to him.

4 THE COURT: I'm going overrule the objection. He's not  
5 asking him what it meant but what did it mean to him.

6 BY MR. HO:

7 A Well, basically, it meant to me that we needed to do it  
8 again in 2010, which is what we had done in 2008, and that we  
9 needed to address low voter turnout during this time of year.  
10 Because, again, that is, working in this industry, you have  
11 found that, when it's not a major election, the turnout is lower  
12 in mid-term than it is during other times of the year. So,  
13 therefore, it just means that we needed to work harder and focus  
14 on first time voters, those who didn't vote as often. And, you  
15 know, again going back to the poor, if they're unemployed, the  
16 poor.

17 Q Reverend Taylor, I just want to ask you about the next  
18 sentence in this document. And I'll go ahead and read it. It  
19 says: Components of the campaign will include door-to-door  
20 neighborhood canvassing, targeting economically distressed  
21 communities, community based voter guides, toll-free hot lines,  
22 phone banking, public service announcements and community  
23 forums.

24 Did the Louisiana state NAACP in 2010 engage in  
25 any of these activities?

1 A Yes, we did.

2 Q Which ones?

3 A We did the door-to-door neighborhood canvassing. We  
4 concentrated on the inner city. We didn't have toll-free hot  
5 lines, but we did do phone banking. We did do public service  
6 announcements. And we did community forums.

7 Q I'd like to set these documents aside.

8 I want to ask you very broadly, and then we can  
9 talk about specifics here; but, very broadly, does the Louisiana  
10 State Conference of the NAACP ever receive any funding to do  
11 work around voting?

12 A Occasionally.

13 Q What are some of the sources of funding for voter related  
14 work that you've received over the years?

15 A In 2000 and 2004 we had --

16 MR. PHILIPS: Your Honor, Your Honor --

17 THE COURT: I think we need to go into 2010.

18 MR. HO: If we could have a quick sidebar. Apologize.

19 (Sidebar conference.)

20 MR. PHILIPS: He hasn't established that it makes any  
21 difference.

22 MR. HO: I agree, it's not directly related to our  
23 affirmative case. But, during motion practice with the  
24 defendants, what we've been arguing is that the structure of the  
25 funding in 2004 was such that it wasn't really the Louisiana

1 NAACP's resources that were being used towards voter  
2 registration, and I think it's helpful to explain what they did  
3 in 2004 and explain what they did in subsequent years, which was  
4 actually very different from that.

5 MR. PHILIPS: Why don't we just talk about the  
6 subsequent years. I just think that's fine.

7 MR. HO: If the defendants aren't going to get into the  
8 years 2004.

9 THE COURT: I'm trying very diligently to keep you all  
10 focused to the time preceding the lawsuit.

11 MR. HO: Okay. We're all going to stay out of that,  
12 then that's fine with me.

13 (Sidebar concluded.)

14 BY MR. HO:

15 Q So let's talk about more recent years, not 2004, but let's  
16 talk about 2010. What were the sources of your funding for  
17 voting related work in the year 2010?

18 First of all, did you have any sources of funding,  
19 I should have said, for voting related work in 2010?

20 A In 2010, we had very limited funding. However, the funding  
21 that we had, Your Honor, came from the NAACP national office  
22 Civic Engagement.

23 Q And, to the best of your recollection, about how much money  
24 did the Louisiana State Conference receive?

25 A In 2010, I want to say it was approximately around \$10,000.

1 Q And what kinds of activities did that funding support?

2 A It supported telephone banking, it supported canvassing, it  
3 supported registration Getting Out to Vote.

4 Q Everything that we've talked about today?

5 A Yes.

6 Q Was that funding -- strike that.

7 Would you describe that funding as a grant?

8 A That's what it was described as. We had to fill out  
9 paperwork in order to get this funding.

10 Q And the estimate that you gave us of about \$10,000 for  
11 funding in 2010, how did you arrive at that number?

12 A Basically, I was -- I thought about how much I had  
13 requested, and then I thought about how much I actually had  
14 received. And it was about approximately \$10,000.

15 Q Did you get the full amount that you had requested?

16 A No, I did not. I requested close to \$30,000.

17 Q Do you have any documents stating the exact amount of money  
18 that you received?

19 A No, I don't.

20 Q Why not?

21 A I never kept any type of documents like that.

22 Q Do you know if there's an annual budget for the Louisiana  
23 NAACP?

24 A Yes. We do have an annual budget.

25 Q And when does that budget come into existence?

1 A In January. In the January -- I don't know when it comes  
2 into existence, but it's presented to us as a body usually at  
3 our January meeting.

4 Q Is that at the beginning or the end of your fiscal year?

5 A It's at the beginning of our fiscal year.

6 Q And does -- is that budget ever amended to reflect expenses  
7 incurred during the year?

8 A I don't understand the question, Mr. Ho.

9 Q After January, do you ever amend that budget later in the  
10 year to reflect the actual expenses that you incur?

11 A No, sir.

12 Q What about additional funding sources that you obtain, do  
13 you amend the budget for that?

14 A No, sir.

15 Q I want to draw your attention to another document. This is  
16 plaintiff's Exhibit 241, which in your binder, is tab No. 4.

17 THE COURT: I just need to ask a couple of questions.

18 MR. HO: Sure.

19 THE COURT: Reverend Taylor, you got about \$10,000, you  
20 said?

21 THE WITNESS: Yes, ma'am.

22 THE COURT: How did you get it? I mean, was it in a  
23 check?

24 THE WITNESS: It was sent from national, the national  
25 NAACP office, in check form.

1 THE COURT: To whom?

2 THE WITNESS: It was sent to me -- well, actually, it  
3 was sent to Louisiana State Conference by Federal Express, and  
4 I'm usually the one who went to pick it up.

5 THE COURT: Then did you deposit it, or did you just  
6 cash it?

7 THE WITNESS: No, ma'am. At that point, I gave that  
8 check to our president, Dr. Earnest Johnson.

9 THE COURT: Okay. And it was deposited to the  
10 conference account?

11 THE WITNESS: Yes, ma'am.

12 THE COURT: All right. Thank you.

13 You may proceed.

14 BY MR. HO:

15 Q Let's look at this. Take a look at this document, and let  
16 me know when you're ready to talk about it.

17 A What tab did you say it was, sir?

18 Q It's tab No. 4.

19 A Yes, sir, I'm familiar with this document.

20 Q What is it?

21 A It's an application for a grant for a Let's Do It Again  
22 2010.

23 Q If you flip through it, say on page 654, there's some  
24 information filled in there into this form. Who filled that  
25 information in?

1 A I did.

2 Q Is this the final version of the grant application for that  
3 year?

4 A No. This was just a draft.

5 Q Do you know where the final version is now?

6 A I have no idea, sir.

7 Q Who is this a request to?

8 A This went to -- actually, it went to Mr. Kirk Clay -- it  
9 went to the Civic Engagement department, attention Mr. Kirk  
10 Clay.

11 Q And could you turn forward a few pages to LA-NAACP 658.  
12 What is this page?

13 A This is an itemized page of my budget.

14 Q And what's the total requested here?

15 A \$28,929.

16 Q To the best of your recollection, were you awarded that full  
17 amount?

18 A No, sir. As I stated, we were -- we got approximately  
19 \$10,000 that year.

20 Q Is this the only grant that you applied for from national  
21 that year? And, I mean, for anything.

22 A No, sir, I don't believe so.

23 Q Do you have paperwork from all the grants that you submitted  
24 to national?

25 A Whatever grants were submitted, I submitted the paperwork



1 that I had.

2 Q Did you have any reporting requirements that you adhered to  
3 in connection with this grant reporting to national?

4 A Not officially. Mr. Clay, who I had, you know, developed a  
5 very good working relationship with, he did a lot of webinars,  
6 but we also did a lot of telephoning. So, basically, on a  
7 weekly basis, I would call him or he would call me, and we would  
8 discuss the activities that were going on in the state of  
9 Louisiana. And that was the only reporting that was really  
10 done.

11 Q I want to show you one other document -- and, I apologize,  
12 it is not in your binder -- but it's plaintiff's Exhibit 242,  
13 and I can put it on the Elmo.

14 MS. CANGELOSI: What's the number, 24 what?

15 MR. HO: 242.

16 MS. CANGELOSI: Just one page?

17 MR. HO: Yes.

18 Permission to approach, Your Honor?

19 THE COURT: Yes.

20 MS. CANGELOSI: That's not 242.

21 MR. HO: It's not 242, I apologize. I obviously have  
22 the wrong number. I apologize, Your Honor. Thirty seconds to  
23 figure out the correct number.

24 (Pause in proceedings.)

25 MR. HO: I believe it's 244, Your Honor.

1 And permission to approach the witness?

2 THE COURT: You may.

3 MR. HO: I apologize, Your Honor. I never moved in the  
4 last docs that we talked about into evidence. So --

5 THE COURT: Which was the grant application?

6 MR. HO: Yeah. The previous grant application. So, at  
7 this point, I'd like to offer 241.

8 MR. PHILIPS: Objection, Your Honor. The witness  
9 testified it's merely a draft. It's not the basis for any  
10 order. He testified about early access.

11 THE COURT: Sustained.

12 BY MR. HO:

13 Q Let's talk about this one page, Reverend Taylor. This is  
14 242.

15 What is this?

16 A This is a budget, itemized budget submitted.

17 Q For what?

18 Do you recognize it, first of all?

19 A Yes.

20 Q And who filled in the numbers here?

21 A I did.

22 Q And what did you do it for?

23 A We were -- at this point, we were finishing up our  
24 campaigning, if I remember correctly. So we used this as the  
25 last part to finish up telephone banking -- to get the folks out

1 to vote. As I explained to you before, it's a three-pronged  
2 process, and this was the final leg.

3 Q So this is -- I'm sorry -- for what is it in what part?  
4 Which prong?

5 A It was for the mobilization part of the program.

6 Q Is this the final version of the table for this application?

7 A Again, final table? You mean, is it a draft? It's a draft.  
8 It's not the final.

9 Q Were you ever awarded that amount?

10 A Yes, we were.

11 Q And do you remember when you were awarded that amount?

12 A Not the exact date, although we did receive it before the  
13 election. That much, I know.

14 Q Was it used for voter registration work, this particular  
15 grant?

16 A No, sir. Voter registration work was finished at that time.  
17 So this was used for education and mobilization.

18 Q I want to shift gears, Reverend Taylor, and ask you a couple  
19 of questions about something else, and then we'll come back to  
20 some voter registration work in a second.

21 Have you ever submitted a written statement in  
22 this case?

23 A Excuse me?

24 Q Have you ever submitted a written signed statement in this  
25 case?

1 A Yes, I have.

2 Q And do you remember sitting here today how many times you've  
3 signed a written statement in connection with this case?

4 A Yes. Twice.

5 MS. CANGELOSI: Objection, Your Honor. I don't know  
6 what the relevance of that is.

7 (Sidebar conference.)

8 THE COURT: What have we got?

9 MR. HO: Well, one of the basis for which Ms. Cangelosi  
10 has tried to impeachment testimony in the past is the  
11 recollection of about the number of times he signed his election  
12 declaration. So I just wanted to make the record clear, he  
13 knows how many times he signed the statement.

14 MS. CANGELOSI: I didn't ask it.

15 THE COURT: I think you can ask him how many times,  
16 because we are not going to have you going through the statement  
17 with him.

18 MR. HO: Understood.

19 (Discussion held off the record.)

20 (Sidebar concluded.)

21 BY MR. HO:

22 Q One last set of questions, Reverend Taylor. And then I'm  
23 going to turn it over to the lawyers for the other sides.

24 Have you applied for any funding from national for  
25 voter related work this year, 2012?

1 A We have spoken about it. However, until I get the official  
2 paperwork, I have not officially applied or I have not  
3 officially asked for money.

4 Q So have you received any money from national?

5 A No, we have not. Not of yet.

6 Q Has that stopped you from doing voter registration work?

7 A No, sir. Not at all. And, if I may elaborate on that, what  
8 we do, we are the NAACP, we're a volunteer organization. If we  
9 waited to get paid for everything we did, we would do nothing.

10 MR. HO: All right. Those are the only questions I  
11 have for you right now, Reverend Taylor. Like I said, the  
12 lawyers for the other side are going to ask you some questions,  
13 Judge Milazzo may have a few additional ones, and I may  
14 follow-up with a few.

15 MS. CANGELOSI: Your Honor, would you consider a break  
16 so I can get organized?

17 THE COURT: I would consider a break for other  
18 purposes. Court's at recess for 10 minutes.

19 (Proceedings in recess.)

20 (Sidebar conference.)

21 MS. CANGELOSI: Here's my question, and you can inform  
22 me what the rulings I need to know, and I need to put it on the  
23 record. Are you just looking for standing purpose only for the  
24 2010? Because I have all the paperwork with the Louisiana state  
25 conference. So the only reason to go into that is he said 2004,

1 2008, 2010. Globally, he said that. I have evidence to  
2 contradict that 2004 was the LA state conference work.

3 THE COURT: I think what he said -- the way I looked at  
4 it was they discovered a problem at these offices because they  
5 were effective there because lots of people hadn't registered to  
6 vote. And then we moved into 2010, and that's -- we're focusing  
7 on 2010.

8 MS. CANGELOSI: Not 2000. Because I can establish, in  
9 2004, that is not state conference, it was an independent  
10 contractor. I can establish that for 2010. All I got to do is  
11 2010, I'm good.

12 THE COURT: All we're doing is 2010.

13 MS. CANGELOSI: Can I state on the record? It's now  
14 stated?

15 THE COURT: Yeah, you objected.

16 MR. HO: I tried to get in testimony about 2004, and  
17 you objected.

18 MR. PHILIPS: The basis of my objection was standing at  
19 the time the suit is filed.

20 MS. CANGELOSI: So all we're talking about is 2010.  
21 Not the global stuff.

22 THE COURT: No.

23 MS. CANGELOSI: I'm good.

24 THE COURT: I think it was, you know, we went there  
25 because it was like how did you end up finding this place

1 because somebody was very effective. That's it, and then we  
2 moved on. And I limited him. I didn't let him go back.

3 MS. CANGELOSI: Is it on the record that there is an  
4 objection, or should I say it out loud?

5 THE COURT: You're objecting to me not allowing you to  
6 go back --

7 MS. CANGELOSI: No. I just want to make sure you don't  
8 say: Oh, well, they've been doing stuff since 2004.

9 So we're only looking at 2010 activity.

10 THE COURT: Right, right.

11 (Sidebar concluded.)

12 CROSS EXAMINATION

13 BY MS. CANGELOSI:

14 Q Good afternoon, Reverend Taylor. How you doing?

15 A Good afternoon.

16 Q It's my understanding that you said, in 2010, for the year  
17 2010, that the state conference LA NAACP received \$10,000 in  
18 funds from the national office of the NAACP?

19 A Approximately that, yes, ma'am.

20 Q And that this \$10,000 in funds that they received was the  
21 money used to conduct whatever voter registration activity was  
22 done for that year, 2010?

23 A That is correct.

24 Q And you also said that you think at least \$5,000 of it came  
25 in in the form of a grant, and your lawyer showed you earlier

1 Let's Do It Again 2010 unit grant application?

2 MR. HO: Objection, Your Honor. She's misstating the  
3 testimony. We talked about two different --

4 MS. CANGELOSI: Let me just ask him.

5 THE COURT: I just want to read the question again.

6 (Pause in proceedings.)

7 THE COURT: Just rephrase your question.

8 MS. CANGELOSI: Let me ask him so I don't have to  
9 restate it.

10 BY MS. CANGELOSI:

11 Q The \$10,000, you said you got in 2010 from the NAACP  
12 national office; is that correct?

13 A That is correct.

14 Q And was -- would they come from some grant or some receipt  
15 like that?

16 A The only monies that we received were through grant  
17 applications.

18 Q Okay. So, in 2010, you received a total of \$10,000 through  
19 grant applications, and that's what you used for voter  
20 registration activities?

21 A That's what we used for activities, yes, ma'am.

22 Q All right.

23 And do you know what those two grants were, or  
24 what the one grant was, or what the grants were?

25 A I don't understand your question, ma'am.



1 Q Let me show you a document that I have marked as SOS Exhibit  
2 60. And just take the time, whatever time you need, and tell me  
3 if you recognize that.

4 A Yes, ma'am.

5 Q Have you looked at the whole thing?

6 A Yes, ma'am.

7 Q And so SOS Exhibit 60, the first page is an email from you,  
8 it appears to Kirk Clay, dated September 26, 2010; is that  
9 correct?

10 A That is correct.

11 Q And then, following that, there's the first page of the next  
12 document is called the Let's Do It Again 2010 unit grant  
13 application?

14 A That is correct.

15 MR. HO: Objection, Your Honor. I don't think the  
16 email's clear that that's --

17 MS. CANGELOSI: That's what I'm trying to ask him, Your  
18 Honor.

19 MR. HO: It's a separate document.

20 MS. CANGELOSI: That's what I'm trying to ask.

21 THE COURT: Let her lay the foundation.

22 BY MS. CANGELOSI:

23 Q So the next page is Let's Do It Again 2010 unit grant  
24 application; is that correct?

25 A That's what it shows on the monitor.

1 Q And then what follows is a second page numbered 650;  
2 correct?

3 A Yes, ma'am.

4 Q And then another page that starts at the top Let's Do It  
5 Again 2010 grant application; is that correct?

6 A Yes, ma'am.

7 Q Then the next page talks about application evaluation grant  
8 regulations; is that correct?

9 A That's correct.

10 Q The next page talks about, I, Unit Program Information; is  
11 that correct?

12 A That's correct.

13 Q The next page is Let's Do It Again 2010 grant program  
14 application; is that correct?

15 A Yes, ma'am.

16 Q And then there's another page that's section C -- I'm just  
17 trying to identify this -- the next page has a section D and a  
18 section E and then had a budget. Is that correct?

19 A Yes, ma'am. It seems to be.

20 Q All right.

21 And, on the first page, which was the email that's  
22 dated September 26, 2010, the subject line is Let's Do It Again;  
23 is that correct?

24 A That's correct.

25 Q And the necessary message that you write on your email and

1 send to Mr. Clay is: Here it is grant information, this is  
2 ongoing from the census and will continue until November  
3 election.

4 MR. HO: Objection, Your Honor. I don't think she read  
5 that correctly.

6 MS. CANGELOSI: I thought I did.

7 THE COURT: I'm at a --

8 MR. HO: There was an extra word or two.

9 BY MS. CANGELOSI:

10 Q Why don't you read what the email says, Mr. Taylor.

11 A It says here is grant information. This is on-going from  
12 the census and will continue until November election.

13 Q So, with that, is that the next -- and, with these numbers  
14 of discovery production at the bottom right-hand corner, it says  
15 LA NAACP 648. Do you see that?

16 A Yes, ma'am.

17 Q And the next one is 649. And then 650, et cetera. The  
18 numbers are in succession. Is that correct?

19 A Yes, ma'am.

20 Q So is what follows after the email, the grant information  
21 that you sent to Mr. Kirk Clay at the national office in the  
22 national NAACP office?

23 A This is the grant information. I don't know if it was --  
24 again, the way the papers are numbered here, I don't know if  
25 that's the sequence that it went. I don't know if I sent the

1 grant information immediately after I sent the email or how that  
2 worked. I believe that it all went in succession though.

3 Q It all what?

4 A Went in succession, went in chronological order.

5 Q Yeah. That's what I'm wondering, is the grant information  
6 that you sent to Mr. Clay is these following pages. Is that the  
7 grant information you sent to Mr. Clay?

8 A I would think so. Again, I sent more than one grant  
9 application to Mr. Clay.

10 Q Right.

11 But, for the Let's Do It Again 2010 unit grant  
12 application, is that what you sent to Mr. Clay with the email?

13 A Yes. I would say it's the same. Yes, ma'am.

14 Q Okay. All right.

15 MS. CANGELOSI: Your Honor, I'd like to offer and  
16 introduce into evidence SOS Exhibit 60.

17 MR. HO: Object, Your Honor. He said he didn't know,  
18 and then Ms. Cangelosi kept asking the same question over and  
19 over again.

20 THE WITNESS: If I may --

21 THE COURT: I'm going allow it into evidence.

22 MS. CANGELOSI: All right.

23 (Exhibit admitted.)

24 BY MS. CANGELOSI:

25 Q So you said again in 2010 that you got \$10,000?

1 MR. HO: We actually offered this into evidence  
2 ourselves, but it just got excluded by the secretary when we  
3 offered it.

4 MS. CANGELOSI: I didn't object, Your Honor.

5 MR. PHILIPS: I think we objected because he said that  
6 was his draft.

7 MR. HO: I don't think it's verified whether this is in  
8 fact the same.

9 MS. CANGELOSI: Your Honor, can we approach?

10 THE COURT: Yes, please.

11 (Sidebar conference.)

12 MS. CANGELOSI: Your Honor, when it was offered  
13 earlier, Mr. Philips objected because Mr. Taylor testified it  
14 was a draft. When I said it was an email and now I'm saying,  
15 hey, this is what you sent to Kirk Clay, this is what you sent,  
16 and he said, yeah, that's what he sent.

17 MR. HO: It's not exactly the same document.

18 MS. CANGELOSI: It's not a draft. I have it, what he  
19 sent.

20 MR. HO: It's been identified as a draft earlier, and  
21 you're leading him around.

22 MS. CANGELOSI: You want it in now, or now you don't  
23 want it in?

24 THE COURT: Ya'll both play that game.

25 MS. CANGELOSI: I didn't object. I want it in.

1 MR. PHILIPS: I didn't mean to mess this up.

2 MS. CANGELOSI: I can show you where he identified it  
3 in his deposition.

4 THE COURT: The deposition's --

5 MS. CANGELOSI: I know.

6 MR. PHILIPS: Your Honor, if the Court is satisfied  
7 that the document is what it's being offered for, that the  
8 document is what it has been represented to be by Mr. Ho  
9 initially when it was offered and by Ms. Cangelosi, and my  
10 objection is messing that up, I withdraw the objection.

11 My objection was based on the testimony that the  
12 document was a draft.

13 (Pause in Proceedings.)

14 THE COURT: Is there a date?

15 MS. CANGELOSI: There's some dates on it.

16 THE COURT: These dates precede the document. So  
17 that's kind of confusing.

18 What is your objection, Mr. Ho?

19 MR. HO: As a draft. I don't think the record's clear  
20 that it was in fact attached to that email.

21 MS. CANGELOSI: He said it apparently was.

22 THE COURT: He probably was not -- was this in his  
23 files or something?

24 MS. CANGELOSI: Yes. It's in his documents that he  
25 produced.

1 MR. HO: He had a big disorganized stack of files that  
2 he gave to us.

3 MS. CANGELOSI: It was produced in his deposition,  
4 Judge.

5 MR. HO: And there's more than one grant document in  
6 there. It's not clear what's attached to what.

7 MS. CANGELOSI: It's clear that he is the guy that did  
8 it.

9 MR. HO: We know that it's a draft, and we're willing  
10 to admit it, that that testimony is draft. Just not attached to  
11 the email.

12 MS. CANGELOSI: He sent him the grant information,  
13 according to the email.

14 THE COURT: I'm going to let it in. This really is a  
15 bench trial, guys. A lot of this, I can choose at some point to  
16 give whatever weight or whatever credibility I give to anything  
17 I hear. Sometimes, in a bench trial, it's easier to let it in.

18 MR. PHILIPS: I have a sneaking suspicion that your  
19 decision in the case will not hinge on this document.

20 (Sidebar concluded.)

21 MS. CANGELOSI: So, back on the record, Your Honor.  
22 We've offered to introduce and file in evidence is document SOS  
23 60. The exhibit is identified by the witness.

24 THE COURT: I'm going to allow it, and the objection is  
25 noted for the record.

1 (Exhibit admitted.)

2 MR. HO: Thank you, Your Honor.

3 BY MS. CANGELOSI:

4 Q And then, I think, Mr. Taylor, you also identified another  
5 document as the source of some grant funding in your previous  
6 testimony. I think it was -- is that the document 244?

7 MS. CANGELOSI: Can we see plaintiff's Exhibit 244?

8 THE COURT: We're going to plaintiff's Exhibit 244?

9 BY MS. CANGELOSI:

10 Q Plaintiff's Exhibit 244, that's it, and it's in evidence.

11 Did I understand you to say that that was for a  
12 Get Out the Vote grant?

13 MR. HO: I'm sorry, Your Honor, it's actually not in  
14 evidence.

15 THE COURT: It's not in the record.

16 MS. CANGELOSI: It's not in evidence. It was just  
17 identified.

18 BY MS. CANGELOSI:

19 Q So let me -- you see what 244 is?

20 A Yes, I do.

21 Q And what did you say that was for when you testified  
22 earlier? Because we did talk about it.

23 A I believe this was the grant application that we had sent  
24 in, applied for additional funding right before the election.

25 Q Was it for a Get Out The Vote grant?



1 A Yes, ma'am, it was.

2 Q And it was your testimony that you prepared 244?

3 A That I prepared this, yes, ma'am.

4 Q And it's got something for a sale for a data analyst Tyra  
5 Banks?

6 A That's correct.

7 Q Look, if you will, at SOS Exhibit 56. In SOS Exhibit 56 is  
8 a two-paged document, and the first page is a letter from Kirk  
9 -- and that would be Kirk Clay, that same man at the NAACP, I  
10 assume?

11 A That's correct.

12 Q And it says: Dear Kirk, time is of the essence, we're up  
13 for the job, Louisiana State Conference is ready to work, but in  
14 order for us to be successful we need to have the funds released  
15 in a timely manner, this is the budget for the 2010 Get Out The  
16 Vote grant, please give me a call if you have any questions  
17 regarding this document. And it's signed by you, Reverend  
18 Chipps Taylor?

19 MR. HO: Objection, Your Honor. It's not signed.

20 MS. CANGELOSI: No. Your name is typed on the bottom.

21 THE COURT: I'm going to let him see if he can identify  
22 the document.

23 BY MS. CANGELOSI:

24 Q So look at SOS Exhibit 56 and see if you can identify that.

25 THE COURT: Wait. Where are we now?

1 MS. CANGELOSI: SOS 56.

2 THE WITNESS: Yes. I recognize it.

3 BY MS. CANGELOSI:

4 Q And is that something that you wrote and sent to Kirk Clay  
5 of the NAACP national office?

6 A I presume I did.

7 Q And is the budget that was attached to the second document  
8 on SOS Exhibit 56, which is the -- can you see the second page  
9 of it?

10 A I can see the second page, but I have -- I'm not sure that  
11 this letter that I wrote to Mr. Clay was attached to this  
12 budget.

13 Q Okay.

14 A I don't know if --

15 Q Is the budget the budget to the 2010 Get Out The Vote grant?

16 A There were more than one budgets that we submitted.

17 Q Well, I'm just trying to figure out the \$10,000 that you got  
18 for 2010 you said you got from grants. Is that correct?

19 A Yes, ma'am.

20 Q So I'm just trying to find the grants. And I think we've  
21 established that SOS exhibit, the one we just put in evidence,  
22 was the Let's Do It Again grant. Is that correct? That was the  
23 application.

24 And then you testified about this budget for a  
25 grant. Was this the other \$5,000 for the Get Out The Vote

1 grant?

2 A This was a budget -- see, I'm not sure of the dates of when  
3 this one was submitted. I believe, to the best of my  
4 recollection, if this was the one that was submitted, this one  
5 was submitted near the end of our program. However, there was  
6 no date on it. So I can only --

7 Q Let me just try it this way. Did you get \$5,000 for the  
8 Let's Do It Again grant in 2011 and \$5,000 for a Get Out to Vote  
9 grant in 2010?

10 A Ma'am, the best that I recall, we received approximately  
11 \$10,000. How, you know, again --

12 Q All right. Well, let's look at your deposition, and then  
13 see what you said at that time about it.

14 A Okay.

15 Q Remember when you were deposed? SOS Exhibit 43 is your  
16 deposition of June 6, 2012. You remember being deposed at that  
17 date in Mr. Wilson's office?

18 A Yes, ma'am.

19 Q Let's look on page 101, starting on line 18.

20 THE COURT: Is it 52?

21 MS. CANGELOSI: 43.

22 THE COURT: Thank you.

23 BY MS. CANGELOSI:

24 Q It says, starting at line 14: Did you get a Let's Do It  
25 Again grant at any time?

1 I believe we did. I'm not sure what year that  
2 grant came.

3 I'm going to show what I'm going to mark as  
4 Exhibit 14. I don't think I have other copies of that one.  
5 Sorry. Here it is, you've looked at it.

6 Yes, ma'am.

7 And we can show you Exhibit 14, there was attached  
8 to the deposition.

9 A Ms. Cangelosi, what page are you on?

10 Q I'm sorry, I'm on page 102. What did I say?

11 A Could you start again, because I was --

12 Q Let's Do It Again grant.

13 Answer: I believe I did. I'm not sure what year  
14 that grant came.

15 Question: I'm going to show you what I'm going  
16 mark as Exhibit 14. And I don't think I have other copies of  
17 that one. Sorry. Here it is, you have looked at it.

18 Answer: Yes, ma'am.

19 Question: Is that a grant you applied for and  
20 that you think you received, the Louisiana State Conference  
21 received the money?

22 Answer: We did not receive the total amount of  
23 the money. This was --

24 Question: So you think you might have. I'm  
25 sorry. Go ahead.

1                   Answer: No. We did not receive the total amount  
2 of this money.

3                   Question: So, in 2010, you told me you got  
4 \$10,000. And we know you got \$5,000 for the Get Out the Vote  
5 grant. And we'll have to show you you said that in your  
6 deposition. But, anyway, did you get \$5,000 from this one?

7                   And you say: This may have been the one that we  
8 got 5,000, or we may have gotten -- again, the 2009 or 2010 were  
9 somewhat tied to it.

10                  But did you see in the email on the front of this,  
11 this is the grant information, this is constant and will  
12 continue until the November election?

13                  So, I mean, is that what you said at that time  
14 about this?

15       A     Yes, ma'am.

16       Q     That's not what you said --

17       A     That's what the deposition says, yes, ma'am.

18       Q     Yeah.

19                  And so -- and then look on page 101 also. And I  
20 say in question about getting, on line 3: So you did get a  
21 \$5,000 Get Out the Vote grant in 2010?

22                  Answer: I believe we did.

23                  Okay.

24                  Okay.

25                  And is that part of the \$15,000 you were talking

1 about?

2 Answer: Yes, it is.

3 MR. HO: I'm going object, Your Honor. I don't  
4 understand what she's impeaching here. She's reading deposition  
5 testimony.

6 MS. CANGELOSI: He said he didn't know what the Get Out  
7 the Vote grant was for, the \$35,000 in 2010.

8 MR. HO: I don't think there's anything inconsistent.

9 THE COURT: I'm going to overrule your objection at  
10 this time. To be very frank, I'm not sure where the conflict  
11 is. So why don't you ask your question.

12 MS. CANGELOSI: I don't know why I'm having so much  
13 difficulty.

14 BY MS. CANGELOSI:

15 Q In 2010, you got \$10,000 from the national office to do  
16 voter registration activity for the Louisiana State Conference  
17 of the NAACP?

18 A Approximately, yes, ma'am.

19 Q And the \$10,000, you said, came from grants from the NAACP?

20 A Yes, ma'am.

21 Q National.

22 \$5,000 of it, you got from the Get Out The Vote  
23 grant application; is that correct?

24 A Yes, ma'am.

25 May I say something, if I may? To the best of my

1 knowledge, I received the \$10,000. Now, how it came, I know it  
2 came from grant money. Which grant, how the grants, the dates,  
3 I'm not sure about. So all I know is that the money did come in  
4 the year, you know, for the 2010 campaign.

5 Q And you testified in your deposition, did you not, that you  
6 applied for the Get Out The Vote grant for a large amount of  
7 money in 2010, but you will only received \$5,000 for the Get Out  
8 the Vote grant that year?

9 MR. HO: Objection, Your Honor. I think it was a  
10 different -- I think she's referencing to a different one, the  
11 numbers and the -- she's not matching the number up with the  
12 right grant.

13 THE COURT: Approach.

14 (Sidebar conference.)

15 MS. CANGELOSI: Obviously, my skills are lacking. He  
16 said in his deposition -- and, given enough time, I can find the  
17 right pages.

18 THE COURT: I want to make sure I understand what  
19 you're doing. I think he's saying, if he doesn't remember, you  
20 can refresh his recollection. We had that conversation  
21 yesterday.

22 The other thing is, are you asking if there was a  
23 total of 15, or if it was 10-5?

24 MS. CANGELOSI: His testimony, as I understand it, in  
25 2010, he got \$10,000 total. I understand him to say previously

1 in his deposition he got \$5,000 from the Get Out The Vote grant  
2 application and he got \$5,000 for the Let's Do It Again grant  
3 application. That's all I'm trying to get at. But I'm having  
4 trouble.

5 THE COURT: I think it will -- maybe just try to ask  
6 him just like that.

7 MR. HO: That's not what I heard from the podium.

8 THE COURT: I think, just ask him directly. Because I  
9 was getting confused, and I think there was an effort I think to  
10 make it a little more complicated.

11 MS. CANGELOSI: That's all I'm trying to do.

12 THE COURT: Thought so. So I said let's get up here to  
13 see. If he says he doesn't remember, you can refresh his  
14 memory.

15 BY MS. CANGELOSI:

16 Q We're going to try to get it. You got \$10,000 --

17 THE COURT: Can we hold down the noise, please.

18 BY MS. CANGELOSI:

19 Q Got \$10,000 in 2010 from the NAACP national office to do  
20 voter registration work that year; is that correct?

21 A To the best of my recollection, yes, ma'am.

22 Q And, of that money, \$5,000 came from the Get Out the Vote  
23 grant; is that correct?

24 A Yes, ma'am.

25 Q And the other \$5,000 came in from a Let's Do It Again 2010



1 grant?

2 A That's where -- again, I know it came from grants. And, if  
3 -- you know, I'm confused. And you talk about this grant, that  
4 grant, which grant came from -- you know, again, as I attempted  
5 to explain to Mr. Ho, without having the exact dates on the  
6 grant information, I can only, you know, what I believe. And I  
7 believe, yes, ma'am, that is correct. But I can't --

8 Q That's good. If you believe it's correct, that's good. All  
9 right.

10 Now, grants in these cases are awarded for  
11 specific purposes; are they not?

12 A Yes, ma'am.

13 Q And is there -- there's documents to describe the purposes  
14 of those grants; is that correct?

15 A That is correct.

16 Q All right.

17 So let's look again at the Let's Get Out the Vote  
18 grant. Let's look again at SOS 60, which is in evidence. Is  
19 this the document, the grant application, that describes the  
20 purposes of the grant?

21 A You talking about the form that's in front of me?

22 THE COURT: Yes, sir.

23 MS. CANGELOSI: SOS Exhibit 60.

24 THE WITNESS: Mine says 649.

25 BY MS. CANGELOSI:

1 Q Yeah. The page 0649, that document. And, following, is  
2 that the document that describes the purposes of that grant?

3 A Yes, ma'am.

4 Q And so, in doing whatever activity you did, did you adhere  
5 to and follow the grant purposes?

6 A The best we could, yes, ma'am.

7 Q And did you do whatever expenditures or work that you were  
8 doing in accordance with whatever the grant said you were  
9 supposed to do?

10 A I'm not sure of the question. We used the grant money for  
11 the Get Out To Vote campaign.

12 Q This is not the Get Out The Vote. And, remember, the Get  
13 Out The Vote grant is another grant. We're talking about the  
14 Let's Do It Again grant.

15 A So are you speaking of the grant for the census?

16 Q I am talking about document 60, the Let's Do It Again grant  
17 application.

18 A Okay. So this is the one for the mid-term election, okay.

19 Q Okay. I'm talking that one.

20 So the only thing I'm trying to say is, doesn't this  
21 document define the purposes the grant? And doesn't it say how  
22 you're supposed to use the money for the grant?

23 A Yes, ma'am.

24 Q And my question is, did you follow the restrictions or the  
25 rules that the grant --

1 A To the best of our abilities, yes, ma'am.

2 Q So did you expend funds other than in accordance with the  
3 grant rules?

4 A No, ma'am.

5 Q Okay. I wouldn't think so.

6 All right. So what do you know the purpose to be  
7 for the Let's Do It Again grant?

8 A To help to -- if this was the mid-term election grant, then  
9 the purpose of this grant was to help get folks out, register  
10 folks, mobilize folks and get them to the polls.

11 Q Okay. But the application itself says, on page 0649: In an  
12 effort to address low voter turnout and issues and targeted  
13 precinct or census tracks, the NAACP is awarding grants to SNAP  
14 state conferences and Let's Do It Again units, these grants will  
15 help units conduct phone banking and outreach activities aimed  
16 at increasing the voter turnout rate and underperforming  
17 targeted precincts and census tracks.

18 That was the purpose stated on that; is that  
19 correct?

20 A Where you at on the letter, ma'am?

21 Q I'm on page 649.

22 A What paragraph?

23 Q The first one.

24 A Okay.

25 (Pause in proceedings.)

1 THE WITNESS: Yes, ma'am.

2 BY MS. CANGELOSI:

3 Q All right.

4 And if you'll turn to page 653.

5 Let me ask you first, Mr. Taylor, look at page  
6 654. And it purports to be a grant application for the Let's Do  
7 It Again grant on behalf of Louisiana State Conference. And it  
8 says proposals submitted by Reverend Edward Chipps Taylor, III.

9 That's you; is that correct?

10 A Yes, ma'am.

11 Q And it says your title is state director for Census Yes We  
12 Can. Is that a title you had?

13 A That's the title I put on this, because there was no  
14 official title. And this is what I was referred to as the  
15 director of the program.

16 Q Did somebody appoint you director of Census Yes We Can?

17 A Kirk Clay did as far as the individual -- each individual  
18 state, from what I understand. I was appointed as a director.

19 Q So you think the national office appointed you as the state  
20 director?

21 A I don't -- I didn't deal with the national office other than  
22 through Kirk Clay. And this was the title that, when I  
23 submitted the application, this is the title that I put down.

24 Q And you're the one who filled out this application; is that  
25 correct?

1 A Yes, ma'am.

2 Q On behalf of the state conference.

3 Look on page 653, and there's at the top of the  
4 page. And it says Unit Program Information. Our plan is to  
5 reach out to the six different tract areas that are projected to  
6 have lower voter turnout percentages for the current census than  
7 they had in the 2000 census.

8 That's information you supplied in connection with  
9 this application?

10 A Yes.

11 Q And you also say: We plan to implement, maintain and  
12 evaluate the phone bank and other operations by using the  
13 Mother's Day count toolkit.

14 A Yes, ma'am.

15 Q That's the information you supplied?

16 A Yes, ma'am.

17 Q Okay. And, under your program goals, you were going to --  
18 under the -- that's the next paragraph -- the goals of this  
19 program is to take the six tracts and divide the phone banking  
20 and community awareness operations into two months, which are  
21 June and July; being that New Orleans has the lowest projected  
22 response rate for the 2010 census, we'll be doing two phone  
23 banks forums for New Orleans, one within the project timeframe.

24 That's information you supplied?

25 A Yes, ma'am.

1 Q And then, if you look on the last page, which is the  
2 projected budget, these were all phone banking activities;  
3 right?

4 A Yes, ma'am. This shows that, yes, ma'am.

5 Q So what you told the national conference you were going to  
6 do is phone banking activities, and for this money. And, in  
7 fact, on page 654, you filled in how many calls, 50,000 calls or  
8 whatever you were going to do on what dates for the phone  
9 banking activities?

10 A Yes, ma'am.

11 Q Now, do you have any records of the receipt of the money?  
12 You said it went to the Louisiana State Conference of the NAACP,  
13 you gave it to Mr. Johnson?

14 A I provided the checks to Mr. Johnson, Dr. Johnson.

15 Q And you assume he deposited it into the NAACP account,  
16 Louisiana State Conference account?

17 And how were the expenses paid?

18 A I don't quite understand the question.

19 Q How were the expenses paid? What was the \$5,000 you had to  
20 pay -- it paid for something; right?

21 A Yes.

22 Q How were those expenses paid?

23 A They were paid by a check. If for example if we did phone  
24 banking in a certain area, let's say in New Orleans, then  
25 whoever was in charge of that banking, that office, would submit

1 a document stating how many workers they had, how much they paid  
2 their workers or the stipend to the workers received, and then  
3 this information was given to Dr. Johnson. And then, based on  
4 that, he would write a check from the Louisiana State Conference  
5 for this activity.

6 Q And you were paying -- ya'll would pay volunteers \$8 per  
7 hour, according to the proposed budget?

8 A Some volunteers were.

9 Q So all your volunteers got paid a stipend? Is that what you  
10 called it?

11 A No, ma'am. All of them did not. Because we were using  
12 college students as well as regular individuals. And college  
13 students had so many hours that they were required to volunteer  
14 for their degree. So everyone did not get paid a stipend.  
15 There were some who just volunteered.

16 Q You didn't tell me about that in your deposition; did you?

17 A You didn't ask.

18 Q Well, let me see what I did ask.

19 A Because, in the deposition, if I remember right --

20 THE COURT: Sir --

21 BY MS. CANGELOSI:

22 Q Let's look at SOS 43, page 101. Starting at question: So  
23 you did get \$5,000 Get Out The Vote grant.

24 A What page are you on?

25 Q 101.

1                   So you did get a \$5,000 Get Out The Vote grant in  
2   2010?

3                   Answer: I believe we did.

4                   Question: Okay. And is that part of the \$10,000  
5   you were talking about?

6                   Answer: Yes, it is.

7                   Question: Okay. And volunteers were paid who  
8   worked under that grant; were they not?

9                   Answer: No, they were not paid. They were given  
10   stipends.

11                  Question: They were given stipends?

12                  Answer: Yes, ma'am.

13                  All right. And that's monetary stipends?

14                  And the answer is: Yes, ma'am.

15   A   Yes, ma'am. However, if you look at that statement, you do  
16   not see where I said that all volunteers were paid stipends.

17   Q   Right. You said -- I said: And the volunteers were paid  
18   who worked on that grant; were they not?

19                  The answer is: No, they were not paid, they were  
20   given a stipend.

21                  And then you say: Stipend's money.

22   A   Again, I did not state -- just like I stated to you just now  
23   -- I did not state that every volunteer -- we have volunteers  
24   that work and have never got paid a stipend.

25   Q   Okay. You didn't state that some volunteers were not paid;



1 did you?

2 A Again, you did not ask me that.

3 MS. CANGELOSI: Your Honor, I offer into evidence this  
4 portion of the deposition as identified. It's SOS Exhibit 43,  
5 page 101, lines 2 through 17.

6 MR. HO: Objection, Your Honor. There's no basis to  
7 admit it. Nothing impeachable here.

8 THE COURT: Well, actually, there is impeachment. I  
9 don't think the deposition needs to come in. Statements are  
10 already in.

11 MS. CANGELOSI: I got it. Thank you, Your Honor.

12 THE COURT: Sustained.

13 BY MS. CANGELOSI:

14 Q So do you have records of the money, the \$5,000 coming in to  
15 the Louisiana State Conference of the NAACP from this grant, and  
16 do you have records of the expenses going out for volunteers or  
17 telephones or whatever they went for?

18 A No, ma'am, I do not.

19 Q Look on page Louisiana State Conference of the NAACP 652.  
20 It's part of the Exhibit 60. It's page 652. And there's some  
21 grant regulations listed for this grant; are there not?

22 A Yes, ma'am.

23 Q And you followed those grant regulations?

24 A No, ma'am, not all of them.

25 Q So you're telling us today that you got grant money from the

1 national NAACP, and you didn't follow the grant regulations?

2 A Not all of them, because of the low amount of money that  
3 came in. And, when it came in, our major concern was to utilize  
4 the money to get some people registered and to the polls as  
5 quick as possible.

6 Q Look at those grant regulations on that page 5652. There's  
7 one, two, three, four -- the fifth bullet. It says: Must  
8 deposit all NAACP grant funds into an approved account to be  
9 used only for non-partisan outreach activities.

10 Does it not?

11 A That's correct.

12 Q And did ya'll do that?

13 A I gave the checks, as I stated, to Dr. Johnson. And I would  
14 think that that's what he did. He put money in the NAACP  
15 account.

16 Q Did you produce any in discovery, in response to the  
17 discovery requests, any records to show that this money went  
18 into the Louisiana NAACP account?

19 A I didn't have that information, ma'am.

20 MR. HO: Objection, Your Honor. He doesn't know what  
21 discovery requests he was responding to, he's not an attorney.

22 THE COURT: Sustained.

23 BY MS. CANGELOSI:

24 Q You testified in your deposition, did you not, that you  
25 provided your lawyers with every document you had regarding

1 voter registration activities on behalf of the Louisiana State  
2 Conference of the NAACP?

3 A That is correct.

4 Q And you testified that all of those were produced in  
5 discovery?

6 A I testified that I gave all of the information I had to my  
7 attorneys.

8 Q Okay. And were you the one that collected whatever  
9 information that the Louisiana State Conference of the NAACP had  
10 with respect to voter registration activities?

11 A Yes, ma'am.

12 MR. HO: I'm going to object, Your Honor. The document  
13 request is in evidence. That's a paraphrase of what the  
14 document request was. He didn't know what the document request  
15 was, he can't testify to that.

16 MS. CANGELOSI: I can prepare to put it in evidence.

17 THE COURT: Wait. I'm sorry. I'm going to sustain the  
18 objection as to the document request but -- I'm going to sustain  
19 in part and overrule in part, because I think it's appropriate  
20 ask if he was in charge of it and what he did with the  
21 documents. And, what he did with the documents, I can make  
22 whatever inferences I deem appropriate.

23 MS. CANGELOSI: Your Honor, I want to put in evidence  
24 the document request and the response. So it's SOS 38, 39 and  
25 40.

1 BY MS. CANGELOSI:

2 Q Does this look like the amount of documents that you  
3 produced to the attorneys?

4 A Ma'am, I have no idea.

5 MR. HO: Objection, Your Honor.

6 THE WITNESS: Your Honor, I don't know how to answer  
7 that.

8 MR. HO: This is a stack of paper, or unrelated papers  
9 that we had an objection on earlier?

10 THE COURT: Stop.

11 (Sidebar conference.)

12 THE COURT: Is he the only one that produced these  
13 documents?

14 MS. CANGELOSI: Um-hum. The requests were all records  
15 related to voter registration. He testified in his deposition  
16 that he gathered them all and he produced. The lawyers in  
17 addition said he produced everything in response.

18 MR. HO: Ms. Cangelosi is leaving out, because there  
19 was a separate request of production of the NAACP's checking  
20 records and financial reports, a third document request that was  
21 untimely, nevertheless we offered to produce those documents. I  
22 have the correspondence here, not subject to a protective order  
23 because we didn't want their financial records just running  
24 around outside, and Ms. Cangelosi rejected that. She's trying  
25 to establish --

1 MS. CANGELOSI: I'm not leaving out. No, that's wrong.

2 THE COURT: This is the thing that -- hold up -- this  
3 is the thing that I just tried to put this all together in my  
4 mind, and it seems to me that this man indicated that he filed  
5 for these grants, he was getting partial sums of what he  
6 requested, he gave the money to the state conference and they  
7 paid the bills from there. I haven't heard that he's in charge  
8 of the checkbook, and that's my concern. We may have a  
9 disconnect, but I'm not sure.

10 MS. CANGELOSI: I might not be, but I didn't ask the  
11 question of him. I asked that the state conference produce with  
12 respect to voter registration drives conducted in 2000 all  
13 financial expense records, whether paper or electronically  
14 stored for the voter registration drive every document, copy of  
15 any/all notes, reports, memorandum, correspondence reports,  
16 other documents of any kind. I asked simply for. I didn't get  
17 one of check. So now he's saying: Oh, we got the money and we  
18 don't have one check to show that.

19 MR. HO: If I could briefly respond to that, Your  
20 Honor. Financial expense records of the voter registration  
21 drives that he keeps, they don't keep those kind of records.  
22 They are checks --

23 THE COURT: There was a separate document request for  
24 canceled checks. I have it on my desk.

25 MS. CANGELOSI: It's in this request. I don't have to

1 ask for cancelled checks. I asked for any and all.

2 MR. HO: There is a separate document request for the  
3 checking account records, which was untimely.

4 MS. CANGELOSI: Which you objected to.

5 MR. HO: Notwithstanding the fact that it was untimely,  
6 we offered to produce those documents to Ms. Cangelosi subject  
7 to a protective order because they didn't want their records  
8 flying around out there.

9 MS. CANGELOSI: Then you shouldn't have sued anybody.

10 MR. HO: Ms. Cangelosi objected to that. We offered  
11 to.

12 MS. CANGELOSI: Well, it's responsive to this one. I  
13 don't have to keep asking you the same question over and over.

14 THE COURT: I'm going allow you to ask these questions  
15 but I'm -- I'll allow you to ask the questions and explore it;  
16 but, you know, what let's not get bogged down in this. I really  
17 kind of got it.

18 MS. CANGELOSI: I'll just put this in evidence.

19 (Sidebar concluded.)

20 MS. CANGELOSI: Your Honor, pursuant to the bench trial  
21 conference, we offer Exhibits 38, 39 and 40.

22 MR. HO: And our objection to I believe No. 40 is that  
23 it's a stack of documents rather than a single document that had  
24 earlier objections based on the documents in the record.

25 MS. CANGELOSI: Actually, on the 38 is the discovery

1 request. 39 is their response, and their response says we're  
2 going to produce it on a CD. This is just the printout of the  
3 CD. If the Court would rather have the CD itself, this shows  
4 that these were all --

5 THE COURT: I can assure you, Ms. McNamara and the  
6 Court would prefer it on a CD.

7 MS. CANGELOSI: We have the hard copy as well as the  
8 CD.

9 THE COURT: Let it be admitted. Your objection is  
10 noted for the record.

11 (Exhibit admitted.)

12 BY MS. CANGELOSI:

13 Q Mr. Taylor, back to SOS Exhibit 60, on page 652, the grant  
14 regulations I had just read you the one, two, three, four, fifth  
15 bullet to require to deposit all funds into an approved account  
16 to be used solely for non-partisan outreach activities.

17 Next bullet required you to pay all bills for  
18 activities by check drawn on the approved account where NAACP  
19 grant funds are deposited.

20 Was that done?

21 A To the best of my understanding, it was. I did not write  
22 the checks. All I did was, again, when I received the checks, I  
23 gave them to Dr. Johnson. I'm sure that Dr. Johnson put them in  
24 the NAACP account. When these people were paid their stipend,  
25 it was written off of the Louisiana State Conference NAACP

1 account.

2 Q And you don't know where those records are today; do you?

3 A No, I do not.

4 Q And you didn't produce those records in part of the  
5 discovery about voter registration? You didn't produce them;  
6 did you?

7 A No, I did not.

8 Q And the regulation further requires the regulations in the  
9 next, second next bullet: Must keep intact and register all  
10 bank statements and cancelled checks, monthly bank statements  
11 and cancelled checks must be kept for three years following the  
12 completion. Yes We Can campaign, these items must be made  
13 available for three years to the national headquarters upon  
14 request.

15 We're within the three year period today of 2010  
16 activity?

17 A Yes, ma'am.

18 Q So -- but it's your testimony that you followed these  
19 regulations, and you did what you said you were going to do in  
20 the form of phone banking in these targeted tract areas?

21 A Yes, ma'am.

22 Q And that was the activity conducted with that \$5,000 that  
23 you obtained?

24 A Yes, ma'am.

25 Q And then the other \$5,000 was on the Get Out The Vote



1 activity. And that's as SOS Exhibit 47 that we put in evidence.  
2 Is that correct? That was the Get Out The Vote activity, that's  
3 what that \$5,000 was used for on this budget?

4 THE CLERK: It's not in evidence.

5 MS. CANGELOSI: SOS 57 is not in evidence?

6 CASE MANAGER: I thought you said 47.

7 MS. CANGELOSI: I did. I got to get drinking.

8 CASE MANAGER: 56 brought up, but I don't think it's  
9 been admitted.

10 MS. CANGELOSI: Your Honor, I'd like to move  
11 defendant's Exhibit 101-57, it contains the Get Out the Vote  
12 budget and the email.

13 THE COURT: Any objection?

14 MR. HO: The same objection that we made before, that  
15 it's not apparent what's attached to what. The Secretary of  
16 State put these two pages together, but it's not apparent.

17 MS. CANGELOSI: I think he identified it.

18 THE COURT: I'm going to allow. Overruled.

19 Your objection is noted for the record.

20 (Exhibit admitted.)

21 BY MS. CANGELOSI:

22 Q So ya'll spent 5,000 on Get Out the Vote on this budget;  
23 correct?

24 A Yes.

25 Q And that's all for phone banking activities. That is what

1 that budget shows; is that correct?

2 A Yes, ma'am. For this budget.

3 Q Okay. So the \$5,000 you got for Get Out the Vote was for  
4 phone banking activities?

5 A And also -- yes, ma'am.

6 Q And Get Out The Vote is primary an election day activity; is  
7 it not?

8 A No, ma'am. It is not.

9 Q Let's look at what your lawyer put in evidence before, it's  
10 the exhibit about the Let's Do It Again toolkit. I think that  
11 exhibit was plaintiff's Exhibit 238. And you said you relied on  
12 this Let's Do It Again toolkit for some activities; is that  
13 correct?

14 A That's correct.

15 Q But we talked about earlier the Let's Get Out The Vote grant  
16 that I showed you a minute ago, and that you said you used as  
17 election day toolkit; is that correct?

18 A Yes, ma'am.

19 Q All right.

20 But, on the Get Out The Vote activities in that  
21 exhibit, which is the Let's Do It Again toolkit, look at page --  
22 it's Exhibit 238, look at page LA NAACP-83. Is that in there?  
23 And that's an information sheet. Do you have that page? On Get  
24 Out The Vote activities.

25 A Yes, ma'am.

1 Q And so this is defined as the Get Out The Vote activities  
2 that you did in connection with the Get Out The Vote grant?

3 A It's -- this defines part of the activities. This right  
4 here just deals with the election day events. We did not wait  
5 until the day of the election to get out and call individuals in  
6 our telephone banking.

7 Q Well, this budget that you sent in doesn't specify what days  
8 you are doing it?

9 A No, ma'am. It doesn't specify any dates.

10 Q So do you have any records of the money you spent? Because  
11 that would show us what days you did it on.

12 A As I stated before, no, ma'am, I do not.

13 Q So there's no record of the \$5,000 going into the Louisiana  
14 State Conference account; is there?

15 A I have no records.

16 MR. HO: Objection, Your Honor.

17 THE WITNESS: Stating this --

18 THE COURT: What was the objection?

19 MR. HO: That she misstated his testimony. He doesn't  
20 know.

21 THE COURT: I think -- I'm going to allow it. He's  
22 under cross examination. The objection is overruled.

23 BY MS. CANGELOSI:

24 Q You managed this activity?

25 A Yes, ma'am.

1 Q All right.

2 You don't have any records of the \$5,000 check?

3 A No, ma'am, I do not.

4 Q Or the \$5,000 deposited into the Louisiana --

5 A No, ma'am, I do not.

6 Q And you don't have any records of whoever was paid \$8 per  
7 hour for work done on this?

8 A No, ma'am, I do not.

9 Q Or whatever was paid for printing of flyers or anything?

10 A No, ma'am, I do not.

11 Q But the activities were phone banking?

12 MR. HO: Objection, asked and answered.

13 BY MS. CANGELOSI:

14 Q Is that correct?

15 THE COURT: Overruled. I'm going allow some of this  
16 because it's cross examination.

17 BY MS. CANGELOSI:

18 Q And, in this election day toolkit that you used, at page  
19 0083, they talk about Get Out The Vote phone banking and what  
20 the primary purposes of it are; do they not?

21 A Yes, ma'am, they do.

22 Q And they list those, the functions of the telephone,  
23 including targeting voters to go get out and vote, providing  
24 information on poll locations and hours, obtaining names and  
25 addresses of voters needing transportation, for babysitting

1 assistance and asking targeted voters if they need assistance  
2 with getting out to vote. Is that correct?

3 A Yes, ma'am.

4 Q So that's how it's defined, and that's what ya'll did?

5 A That's how it was defined in that part, yes, ma'am.

6 Q And that's what you did?

7 A We did that and more.

8 Q For \$5,000?

9 A Yes, ma'am. Because a lot of things that we did, ma'am, we  
10 were never paid for. We did not -- again, the money came --  
11 when the money had come, we had already been working and doing  
12 things to Get Out The Vote. So everything that we did has not  
13 -- there wasn't a dollar amount that people were paid for.

14 Q So your testimony now is that volunteers weren't paid; is  
15 that correct?

16 A No, ma'am, that is not -- all volunteers, as I said or as I  
17 tried to state to you earlier, were not paid or given a stipend.

18 Q A stipend, okay. You and I have a problem with paid and  
19 stipend. But stipend is giving them money; right? So all  
20 volunteers received money?

21 A All volunteers did not receive money.

22 THE COURT: Then what is a stipend?

23 THE WITNESS: A stipend, ma'am, is what you give to an  
24 individual who does certain amount of work. And we paid  
25 stipends to some individuals who were volunteers. However, all

1 the people who worked this program were not paid a stipend.

2 That's the point that I was trying to make, is that, yes, those  
3 who worked to -- like I say, certain students who worked that  
4 were volunteers that didn't have volunteer hours from college,  
5 yes, they were paid a stipend. There are other individuals who  
6 came in, made phone calls, that were not paid a stipend.

7 MS. CANGELOSI: I've already been through that.

8 THE WITNESS: But they were still volunteers.

9 BY MS. CANGELOSI:

10 Q The final thing on this Get Out To Vote toolkit, which you  
11 used, again, look on page 99 LA NAACP 990099. And they define  
12 phone banking as the organization of a group of telephones and  
13 callers who'll call registered voters to persuade them to vote.

14 Is that correct?

15 A Where you at, ma'am?

16 Q On page 0099. Definition of a phone bank. It's the second  
17 thing from the top.

18 A Okay. Okay.

19 Q Um-hum. That's how it's defined in that toolkit that you  
20 used; is that correct?

21 A Yes, ma'am.

22 MS. CANGELOSI: I might be finished, just one second.

23 (Pause in proceedings.)

24 MS. CANGELOSI: Judge, I want to make sure that SOS 56  
25 is in evidence.

1 CASE MANAGER: No.

2 MS. CANGELOSI: I offer SOS 56.

3 CASE MANAGER: The rest of 43, I didn't know if you  
4 wanted to offer that. I know you just did a few lines.

5 MS. CANGELOSI: The rest of 43? I'm not sure I know  
6 what that is.

7 CASE MANAGER: It's the deposition.

8 MS. CANGELOSI: Oh, no. Judge said I didn't need it.  
9 That's all I have, Your Honor.

10 THE COURT: Thank you.

11 Mr. Philips.

12 MR. PHILIPS: No binders, Your Honor. Good sign, no  
13 binders.

14 THE COURT: It's a very good sign.

15 CROSS EXAMINATION

16 BY MR. PHILIPS:

17 Q Mr. Taylor, good afternoon. I don't know that we have met  
18 before. If you'll bear with me for about 15 minutes, I know  
19 it's been a long afternoon for you.

20 A No problem, sir.

21 Q You told us earlier on in your testimony that one of the  
22 things that you do as an official of the Louisiana conference is  
23 training of branches and setting up voter canvassing; is that  
24 correct?

25 A That's correct.

1 Q And you deal with I think we've used the terms units  
2 previously talking about the local organizations of the NAACP;  
3 right? You familiar with that term?

4 A That's correct.

5 Q And can you just tell us briefly how the Louisiana  
6 conference goes about doing this training and assisting the  
7 local units in setting up canvassing activities.

8 A At a NAACP Louisiana State Conference meeting, we will have  
9 training conducted about Get Out The Vote campaigns of things  
10 that we suggest that you may do at your branch in order to help  
11 the people get out.

12 Q Is that an annual event?

13 A No. We have it -- we have four meetings a year. And then  
14 we have our state conference as well as our regional conference.  
15 And, even at our national conference, we -- all of these  
16 conferences, we do some form of training.

17 Q Is the training conducted by you on behalf of the Louisiana  
18 conference, or perhaps by others?

19 A It's done by others as well. I may play a part in it.  
20 However, national will -- for example, in the conference we had  
21 in September that we spoke about, the Everyone Should Count  
22 campaign, Mr. Kirk Clay came down from national and conducted  
23 that training session. And I assisted him in that.

24 Q With respect to voter registration activities, I know you  
25 talked about some about your personal activities in attempting



1 to assist people in registering to vote; true?

2 A Correct.

3 Q What from -- put your official Louisiana conference hat on  
4 for me for a minute, if you would, and tell the Court what it is  
5 you did as a representative of the conference in terms of voter  
6 registration activities.

7 A I was responsible for setting up different entities to make  
8 sure that things got done when it came to registration. For  
9 example, I am responsible for setting up phone banking to make  
10 sure that whatever location they have that the equipment is  
11 supplied however we're going to do that. I'm responsible for  
12 setting up canvassing as far as, you know, different branches.  
13 And, when I say set up, the branch may call me, Shreveport may  
14 call and say: We want to do a voter registration or we're doing  
15 the voter registration here in Shreveport or in Jonesboro.

16 Q So the local units or branches would be conducting this  
17 activity, and they would call upon you for assistance in setting  
18 up or coordinating those activities?

19 A A lot of times, this would happen.

20 Q And you talked some about personal voter registration  
21 activities, and you mentioned the health units; right?

22 The purpose, if you would refresh my memory,  
23 please, the purpose of being at the health units and talking to  
24 people at the health units was what? What group of people were  
25 you trying to identify and register?

1 A The majority of individuals that I felt -- and, again, this  
2 is a Chippsism now, this is a personal opinion of mine -- the  
3 majority of the people who went to the health units were people  
4 who could not afford to go to doctors and, you know, didn't have  
5 insurance and things of this nature. So, therefore, I felt that  
6 it was good fertile ground to register them. Because, again, we  
7 were seeking to register low income as well as  
8 African-Americans.

9 Q When you said a personal, I'm distinguishing that -- correct  
10 me if I'm wrong -- I distinguishing that from some sort of  
11 official posture that the Louisiana conference took about going  
12 to health units to assist people, recruit people to vote; is  
13 that right?

14 A I represented the Louisiana State Conference when I did my  
15 voter activities, whatever the voting activities were. However,  
16 I did not have to go to Dr. Johnson, for example, and say:  
17 Dr. Johnson we're going to set up voting registration at XXX or  
18 YYY. He trusted me enough to do my job and register as many  
19 people as we could.

20 Q So it was personal in the sense that you selected the venue  
21 or the place that you went to do this?

22 A It was personal in the sense that I was the one that did it.  
23 However, I represented the Louisiana State Conference in  
24 everything I did when it came to voter registration.

25 Q If I were a person walking out of -- in or out of a health

1 unit, and you approached me about voter registration, how would  
2 I know that you were associated with the Louisiana conference of  
3 the NAACP?

4 A Because I would identify myself.

5 Q You would tell everyone that you approach?

6 A Yes, I would. Basically, my pitch was: Hi, I'm Reverend  
7 Chipps Taylor with the Louisiana State Conference NAACP.

8 Q You spent I think you told me one day a month at health  
9 units in Hammond; right?

10 A Right.

11 Q Did you ever go to the Louisiana Department of Health and  
12 Hospitals facilities in Baton Rouge or in any other parish, the  
13 offices, to attempt to do voter registration there?

14 A I didn't personally. However, in phone calling with other  
15 individuals -- like I say, work these different branches that we  
16 have that work with us on voter registration. There would be  
17 times when we would have telephone conversations about what  
18 you're doing in your branch, what you're doing in your parish.  
19 And I had recommended that -- I thought again, you know, what I  
20 had seen was that health units and food stamps offices were good  
21 locations for them to go to and register voters.

22 Q But, beyond the things you did personally at Hammond or  
23 Amite, the involvement you had with branches or units conducting  
24 voter registration activities at health units or food stamps  
25 offices was all done through the branches or units around the

1 state?

2 A I might have went to Baton Rouge once or twice. In that  
3 sense. However, it was done by the branches, but it was done  
4 under the banner of the Louisiana State Conference.

5 Q And that's primarily because, is it not, that the Louisiana  
6 State Conference doesn't have any individual members; it works  
7 with units and branches; true?

8 A To the best of my understanding, branches are members of the  
9 Louisiana State Conference. However, in order to be a member of  
10 a branch, in order to be part of the Louisiana State Conference,  
11 you have to be a member of a branch in Louisiana.

12 Q So you belong to a branch and the branch belongs to the  
13 conference?

14 A Again, in my mind, I find that confusing. I believe that I  
15 stated that I am a member of the Louisiana State Conference. I  
16 am the religious affairs chairman for the Louisiana State  
17 Conference. So I belong to the Baton Rouge branch. And, again,  
18 you would have to speak to our parliamentarian, our  
19 constitutional person, for me to understand whether or not. But  
20 as far as I'm concerned, I believe that I hold an office in the  
21 Louisiana State Conference as the religious affairs chairman,  
22 not my branch.

23 Now, branches have -- and, for example, the Baton  
24 Rouge branch that I'm a member of, I'm also the religious  
25 affairs chairman for the local branch in Baton Rouge.

1 Q You said earlier in your testimony that you thought -- you  
2 went to the food stamps offices because you thought the state  
3 had a duty to register people who made application to food  
4 stamps; is that right, to vote? Is it your understanding that  
5 the state has an obligation to actually register people who go  
6 and apply for food stamps or to offer to those people an  
7 opportunity to register?

8 A I believe they have an opportunity or they have a  
9 responsibility to offer registration to these individuals.

10 Q And that's what you did. I mean, you can only offer the  
11 opportunity to someone. You couldn't make them register when  
12 you approached them personally in Hammond or Amite; correct?

13 A That is correct. However, I found that -- again, this is a  
14 personal experience -- that when the people came out who I  
15 approached to register, they were eager to register, a lot of  
16 them. And I had kind of asked, you know, well, didn't -- no,  
17 didn't nobody ask me. And, again, another personal, I have  
18 individual friends who for example live in Hammond, who because  
19 they were talking to me about this case, they asked me about.

20 THE COURT: We're getting a whole bunch of hearsay on  
21 top of hearsay on top of hearsay. I think we need to stop it  
22 right about there.

23 BY MR. PHILIPS:

24 Q Anybody from the Hammond branch or Baton Rouge or New  
25 Orleans accompany you when you went to Hammond for your voter

1 registration activities?

2 A You talking about when I was registering --

3 Q Yes, sir.

4 A No.

5 Q And was it your -- the procedure that you followed when  
6 someone -- you approached someone and you said I'm here to offer  
7 you an opportunity to register to vote and you gave them an  
8 application, I take it? Yes?

9 A A lot of times, they would fill out -- I would fill out --  
10 they would fill out the application right there.

11 Q Then what would happen to it?

12 A I would turn it in.

13 Q To whom?

14 A The Amite, if I was in Amite, used to turn it in to the  
15 courthouse.

16 Q You'd go to the registrar's office?

17 A Yes.

18 Q Did you have some people that would accept the application  
19 and say: Well, let me take it home and look at it and if I  
20 decide I am going to do it I'm going to send it in myself? Have  
21 some people that did that?

22 A You had some, however not so many.

23 Q And you probably had some that said: Thank you very much,  
24 Reverend Taylor but I'm already registered, or I'm not  
25 interested; would you agree with that?

1 A Very few said that they had already registered. You would  
2 get some that would say, you know, I'm not -- you know, I'm not  
3 interested at this time.

4 Q Two questions that I think are fairly specific for you.

5 Can you tell the Court what amount of resources --  
6 and you can talk about resources in terms of dollars, people,  
7 that sort of thing -- but what amount of resources was expended  
8 by the Louisiana State Conference of the NAACP on voter  
9 registration activities that were directed to the Louisiana  
10 Department of Health and Hospitals, that is Medicaid programs,  
11 Women and Infants, Children's programs, recipients of those  
12 benefits?

13 A I have no idea, sir.

14 Q And I have the same question about the amount of resources  
15 expended on voter registration activities directed to food stamp  
16 offices for the state.

17 A Again, I don't know how I would be able to come up with that  
18 assessment.

19 Q Beyond your personal experience, Reverend Taylor, do you  
20 have any information at all that you can share with the Court  
21 about what other branches did that were voter registration  
22 activities directed to either the Medicare -- I'm sorry --  
23 Medicaid WIC programs or to food stamps?

24 A Other than the fact of us discussing it, again, I did not go  
25 there with them to the food stamps office or to that health

1 opportunity, see. However, since we had talked about the best  
2 places to go -- and we know what we do when we assume -- but,  
3 however, I assumed that they did follow my lead and do what I  
4 asked them to do.

5 Q Beyond the assumption -- I agree with you about what we do  
6 when we assume -- beyond the assumption and your personal  
7 experience, you can't quantify for the Court the resources  
8 expended on those activities; is that accurate?

9 A I don't know how I could qualify the resources, because,  
10 again, I don't know how many people went, I don't know how many  
11 hours were spent, I don't know who did it. So, therefore, I  
12 don't know.

13 Q I understand.

14 MR. PHILIPS: Your Honor, could I have five seconds to  
15 find out if we have any other questions? Thank you.

16 (Pause in proceedings.)

17 MR. PHILIPS: Your Honor, once again, I'm told I have  
18 no further questions. Thank you very much. Appreciate it.

19 THE WITNESS: Yes, sir.

20 THE COURT: Mr. Ho, redirect.

21 MR. HO: Thank you, Your Honor.

22 REDIRECT EXAMINATION

23 BY MR. HO:

24 Q Hello again, Reverend Taylor. I'll do my best to keep it as  
25 brief as possible.



1                   Would you bring up on the screen Secretary of  
2 State 60, which is located in tab 4 of your binder, Reverend  
3 Taylor.

4                   And could we turn -- this is -- can we turn to the  
5 second page. Just to remind everyone what this is, this is on  
6 page 649, the Let's Do It Again 2010 unit grant application  
7 which has been admitted into evidence. Can we turn to page 658?

8                   And what is this page again, Reverend Taylor? And  
9 it's on your screen as well, so whatever is easiest for you.

10 A   It's the proposed budget of how we plan to spend the money  
11 that we were requesting.

12 Q   And the third column, the header is, I believe,  
13 Justification. What information do you put in the rows in that  
14 column?

15 A   What you were doing in order to justify why you needed that  
16 money.

17 Q   And let's go after justification four rows down. What do  
18 you see there?

19 A   Are you talking about the door-to-door canvassing?

20 Q   Yes.

21 A   Yes, sir.

22 Q   So did you request money for that?

23 A   Yes, sir.

24 Q   And did the Louisiana State Conference engage in that in  
25 2010?

1 A Yes, we did.

2 Q Let's turn back to page 655. It will be up on your screen.

3 Could you tell me what the last line on this page  
4 is?

5 A The activities in this unit will be implemented for voter  
6 registration, education, and Get Out The Vote and protection  
7 plans.

8 MS. CANGELOSI: Your Honor, I object to him leading.  
9 The parties can read, but the question is what civic activities  
10 will you implement for the next election. It has nothing to do  
11 with this current election.

12 THE COURT: You are leading the witness. So ...

13 (Pause in proceedings.)

14 THE COURT: Objection sustained.

15 BY MR. HO:

16 Q Was voter registration a component of this grant application  
17 as you see it here?

18 A Yes, it was. A very important part.

19 Q Is it set forth on this page?

20 A Yes.

21 Q Let's turn to the previous page. Page 654. Ms. Cangelosi  
22 asked you a few questions about this. The bottom half of it  
23 describes something about phone banking that Ms. Cangelosi asked  
24 you about. What's the starting date for the phone bank  
25 activities listed here?

1 A August the 16th, 2010.

2 Q Do you remember during your direct testimony, Reverend  
3 Taylor, I asked you what's the first question that you're  
4 supposed to ask during phone banking?

5 A Yes, I do.

6 Q What is it?

7 A Are you a registered voter.

8 Q Can we turn to page 2 in your binder?

9 MR. HO: This has been admitted, this is plaintiff's  
10 Exhibit 238.

11 Just so everyone remembers, the title page of that  
12 document is Civic Engagement toolkit Let's Do It Again.

13 BY MR. HO:

14 Q Can you turn to page 71 in this document. Just tell me when  
15 you're ready after you've reviewed it.

16 (Pause in proceedings.)

17 THE WITNESS: Yes, sir.

18 BY MR. HO:

19 Q Under Civic Engagement How-to sheets, do you see that as a  
20 header here?

21 A Correct.

22 Q I want to ask you about seven bullets down. Can you just  
23 read that to me and tell me what it means.

24 A Voter registration, how to use a phone bank to identify  
25 unregistered voters.

1 Q What does that mean?

2 A That simply means that, when you're doing phone banking, you  
3 need to be able to identify unregistered voters, if they are a  
4 registered voter or not.

5 Q I don't have any other questions about these documents,  
6 Reverend Taylor.

7 Two others areas I want to ask you questions  
8 about, just because I want to make a few things clear.

9 First is about the checking account for the  
10 Louisiana State Conference of the NAACP. Did you keep the  
11 checkbook for that checking account at any time in 2010?

12 A No, I did not.

13 Q Did you keep or receive the deposit statements for that  
14 checking account?

15 A No, sir, I did not.

16 Q There were some questions asked by Ms. Cangelosi about  
17 reporting to national in connection with these grants. What  
18 kinds of reporting did you engage in?

19 A As I stated, Mr. Kirk Clay and I had a very active  
20 communication. So I would speak with him at least twice a week,  
21 maybe sometimes even more. And, during our conversations, I  
22 would inform him of what we were doing in the state of  
23 Louisiana.

24 Q Did you have to give him written reports?

25 A No, I did not.

1 Q Did he ever -- were written reports ever requested of you?

2 A No, sir, they were not.

3 Q You referred -- used the phrase, when Ms. Cangelosi was  
4 asking you about this topic, you said something about this being  
5 because of the low amount. That's the phrase that you used.  
6 What did you mean by that?

7 A If I can say this. In the year 2004 --

8 MS. CANGELOSI: Objection, Your Honor.

9 THE WITNESS: -- switched over 179,000 --

10 THE COURT: Sir, there's an objection. We're not going  
11 to go back to 2004. I think -- Reverend Taylor, you need to ask  
12 the question without giving a reference point.

13 THE WITNESS: Let me see if I can answer it this way.  
14 In previous years, when I did this work --

15 THE COURT: I think you can just answer by telling us,  
16 an amount of what?

17 THE WITNESS: Amount of money.

18 THE COURT: Thank you.

19 You can move on.

20 BY MR. HO:

21 Q Why do you describe it as a low amount of money?

22 A Because it was compared to, yeah, what I had received  
23 before.

24 MS. CANGELOSI: Objection.

25 THE WITNESS: Before --

1 THE COURT: Sustained.

2 I got it. You can move on.

3 MR. HO: I understand, Your Honor.

4 BY MR. HO:

5 Q One last topic that I want to ask you about, Reverend  
6 Taylor. You testified earlier that the state conference is  
7 engaging in voter registration work this year?

8 MS. CANGELOSI: Objection, Your Honor. Leading.

9 MR. HO: I apologize.

10 BY MR. HO:

11 Q Is the Louisiana conference of the NAACP engaging in voter  
12 registration this year?

13 MS. CANGELOSI: Asked and answered. And that's to be  
14 covered on cross.

15 THE COURT: I think it is outside the scope.

16 MR. HO: I understand, Your Honor.

17 BY MR. HO:

18 Q Ms. Cangelosi asked you a question about payments for people  
19 who engage in voter registration work for the Louisiana State  
20 Conference of the NAACP. Do you remember that, Reverend Taylor?

21 A Yes, I do.

22 Q Have volunteers been paid for voter registration work with  
23 the Louisiana State Conference of NAACP this year?

24 MS. CANGELOSI: Objection, Your Honor.

25 THE WITNESS: No, they have not.

1 THE COURT: Come here.

2 (Sidebar conference.)

3 THE COURT: I think we're clearly outside the scope of  
4 cross. I think she focused a great deal on the amount of money  
5 that was received or not received in 2010 preceding this  
6 lawsuit. And, that's the time of standing that we look at, at  
7 the time prior to the lawsuit. So I think it's outside the  
8 scope.

9 That being said, how much longer are you going to  
10 be?

11 MR. HO: Less than five minutes, Your Honor.

12 MS. CANGELOSI: Can we quit for the day?

13 MR. PHILIPS: We have two short ones.

14 THE COURT: We can go off the record for this.

15 (Discussion held off the record.)

16 BY MR. HO:

17 Q Ms. Cangelosi asked you about payments for volunteers,  
18 Reverend Taylor. Are volunteers who engage in voter  
19 registration work with the Louisiana State Conference of NAACP  
20 always paid money?

21 MS. CANGELOSI: Objection. Leading.

22 THE WITNESS: No, they are not.

23 THE COURT: It is leading. I think you need to  
24 rephrase your question. But we got an answer. So how about if  
25 I just promise to remember that it was leading when we got that

1 answer, and we can move on since I'm going to be the fact  
2 finder.

3 BY MR. HO:

4 Q Did you pay everyone that works when you do this voter  
5 registration work?

6 A No, we do not.

7 Q When do you pay them? What makes a difference between when  
8 you pay them and when you don't?

9 A A lot of times, the determination is how much money you  
10 have.

11 Q Fair to say, if you have it, you pay them? Is that fair to  
12 say?

13 A Not everyone. We have some volunteers that work and never  
14 get a dime.

15 Q Fair to say, if you don't have it, you don't pay them?

16 A That's exactly right.

17 Q But they still do the work? Do they still do the work?

18 A That's why we're the NAACP.

19 MR. HO: No further questions of Reverend Taylor.

20 THE COURT: Thank you. You may step down. Thank you.

21 THE WITNESS: Am I finished?

22 THE COURT: You're finished.

23 THE WITNESS: Promise you not going to call me no more?

24 THE COURT: I'm not calling. I think he's released.

25 And you can go on Reverend Taylor. Thank you.



1 MR. PHILIPS: Your Honor, I believe, with the Court's  
2 guidance, we've been able to reach an agreement that I be  
3 permitted to call Suzy Sonnier, the secretary of DCFS.

4 THE COURT: Out of order.

5 MR. PHILIPS: Out of order. Without any prejudice to  
6 anybody.

7 THE COURT: Without any prejudice to anyone, we are  
8 going to call --

9 MR. PHILIPS: I promise, we will be brief.

10 THE COURT: I'll hold you to your word.

11 MR. PHILIPS: That's a relative term, so I thought I  
12 would be safe.

13 SUZY SONNIER, being duly sworn, testified as  
14 follows:

15 THE COURT: Ms. Sonnier, I need you to say your name  
16 and spell it for the record, please.

17 THE WITNESS: Suzy Sonnier, S-O-N-N-I-E-R. And Suzy is  
18 S-U-Z-Y.

19 MR. PHILIPS: Thank you, Your Honor.

20 DIRECT EXAMINATION

21 BY MR. PHILIPS:

22 Q Ms. Sonnier, would you tell the Court what your present duty  
23 assignment is, or your job.

24 A Sure. I currently serve as the secretary for the Department  
25 of Children and Family Services of Louisiana.

1 Q When did you assume those duties?

2 A June 5th, 2012.

3 Q So several months?

4 A Sure, yes.

5 Q You were not the secretary when the lawsuit we're here to  
6 talk about today was filed; were you?

7 A No, I was not.

8 Q You had another position in state government at that time?

9 A Yes.

10 Q Since the time you became secretary, were you made aware  
11 through the exercise of your official duties about the claims  
12 asserted by the plaintiffs regarding the National Voter  
13 Registration Act scenarios that affect your department?

14 A Yes. Pretty early in my tenure, I was apprised of the  
15 lawsuit and everything to date with regard to these activities.

16 Q Is this a topic in your organization that is regularly  
17 discussed by your executive staff?

18 A Yes, it is.

19 Q Can you tell the Court just briefly what instructions or  
20 guidance you've given to your executive staff with respect to  
21 either the claims made in the suit or the activities being taken  
22 by your department in response to that?

23 A Yes. My commitment and the direction that I gave to our  
24 executive team and our staff was to ensure that we were in  
25 compliance in any and all ways. From my understanding, to date,

1 we've done our best to try to maintain compliance, to make sure  
2 we are near compliance now.

3 MS. BRANNON: Your Honor, I'm going to object. I think  
4 compliance is a legal conclusion.

5 THE COURT: I'm going to allow it for the purpose that  
6 it's being offered, I think it's corporate.

7 BY MR. PHILIPS:

8 A My directive was to ensure that we were within the letter of  
9 the law and to make sure we were doing everything that we could  
10 to ensure that we would be following the law and that we were --  
11 that anything that had been identified or that was of a concern  
12 of ours, that we ensured as quickly as possible we made sure  
13 that we were doing what we were supposed to be doing if there  
14 was a question.

15 Q The instructions and guidance you just talked about, do  
16 those relate also to the prior rulings of this Court with  
17 respect to activities that the Court found perhaps needed to be  
18 done to bring the department into compliance?

19 A Yes, absolutely.

20 Q And do you anticipate -- let me state something. Strike  
21 that.

22 To the extent that you haven't gotten everything  
23 already implemented that you believe may be required, are there  
24 ongoing efforts do that?

25 A Yes, there are. And I get regular reports of the status of

1 any of those activities by my executive staff.

2 Q Do those activities -- are they directed to revisions or  
3 policies, documents and forms?

4 A Yes.

5 Q What about with respect to your CAFE system?

6 A Yes. Our work, our ongoing work with CAFE is with a number  
7 of vendors. So we have directed those activities to be changed,  
8 whether it be language that needs to be incorporated into our  
9 online activities or online forms or other things. We'll work  
10 with our vendors to do that as quickly as possible.

11 Q Would you also tell the Court what your intentions are with  
12 respect to training of the employees who need to know and deal  
13 with their clients with respect to the National Voter  
14 Registration Act?

15 A Yes. Training is an essential component of the efforts of  
16 activities that we provide ongoing. And, certainly, with regard  
17 to this lawsuit, our intent is to ensure that all new staff are  
18 trained very quickly, almost immediately upon the job, as well  
19 as to ensure that people get ongoing training about the  
20 requirements of this law.

21 Q Is your commitment to the track that you've described to the  
22 Court subject to any revision or to backtrack while you're the  
23 secretary?

24 A No. Not at all. Not at all. And if, you know, if as a  
25 result of these efforts and the Court here, there are new things

1 that are identified, we will absolutely be committed to get  
2 those in place as quickly as possible as well.

3 MR. PHILIPS: Thank you, Ms. Sonnier. I don't have any  
4 other questions.

5 MR. HO: Just a few seconds, Your Honor.

6 MS. BRANNON: Your Honor, we have no further questions.  
7 Thank you very much.

8 THE COURT: Can I get the lawyers just to come up?

9 It's really no big deal, but you can come up, too.

10 I just want you all to know that I know Ms.  
11 Sonnier. Her daughter's friendly with my granddaughter. They  
12 played soccer together. I've seen her on the soccer field, not  
13 as often as I'd like to because I usually try to skip. Just so  
14 that you know.

15 MS. BRANNON: We have no objection to that, Your Honor.

16 MS. CANGELOSI: I don't know --

17 MS. BRANNON: She seems like a very nice person.

18 THE COURT: And no control of either of those 13 year  
19 old girls.

20 I'm more comfortable letting everyone know.

21 MS. BRANNON: We appreciate that, Your Honor.

22 (Sidebar concluded.)

23 THE COURT: Thank you, you may step down.

24 Anything before -- all right.

25 For reasons we discussed here, we're going to

1 recess until tomorrow morning at 8:30.

2 As I appreciate it, the parties have some -- the  
3 attorneys have some stipulations and whatnot to work through.

4 MR. PHILIPS: We do, Your Honor.

5 THE COURT: Remind you to, please, somebody stay and  
6 visit with Ms. McNamara to do exhibits.

7 Thank you. Court will be in recess until 8:30  
8 tomorrow morning.

9 (5:20 p.m., proceedings recessed.)

10  
11  
12 CERTIFICATE

13  
14 I, Susan A. Zielie, Official Court Reporter, do hereby  
15 certify that the foregoing transcript is correct.

16  
17 /S/ SUSAN A. ZIELIE, FCRR

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19 Susan A. Zielie, FCRR  
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