

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COMMITTEE FOR A FAIR AND)	
BALANCED MAP, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:11-cv-05065
)	
ILLINOIS STATE BOARD OF ELECTIONS,)	Hon. John D. Tinder
<i>et al.</i> ,)	Hon. Joan H. Lefkow
)	Hon. Robert L. Miller, Jr.
Defendants.)	(3-judge court convened pursuant
)	to 28 U.S.C. § 2284)
)	

PLAINTIFFS' MOTION *IN LIMINE* TO EXCLUDE JUAN RANGEL

Pursuant to Federal Rule of Evidence 402, Plaintiffs move this Court to exclude testimony by Mr. Juan Rangel (“Rangel”), who defendants have proffered as a fact witness, despite Rangel’s repeated statements in his deposition he had no actual knowledge of anything concerning the Illinois Congressional redistricting process or the Congressional reapportionment plan signed into law (hereinafter the “Adopted Plan”). To be sure, as set forth herein, Rangel has made public statements in support of the Adopted Plan, and specifically his organization’s support for only one Latino majority Congressional district. But as revealed in his deposition testimony, Rangel has no actual factual knowledge to support that position or which would otherwise make him competent to provide any testimony regarding the issues in this case. For these reasons, this Panel should bar the testimony of Juan Rangel.

BACKGROUND

1. Pursuant to a duly issued subpoena, counsel for the Plaintiffs deposed Rangel on October 6, 2011. *See* deposition transcript attached hereto as Exhibit A. During the course of

his deposition, Rangel repeatedly disclaimed any knowledge of the claims, allegations, or defenses arising in this litigation. *Id.*

2. While Rangel acknowledged that he was actively involved in the redistricting of the *Illinois state legislative districts* on behalf of the United Neighborhood Organization (“UNO”)¹, and even proposed certain Illinois state legislative districts as part of the public hearing process, he had no involvement with or knowledge of any particular information concerning the *Congressional* reapportionment process or the Adopted Plan. Quite the contrary, over the course of his deposition, Rangel specifically and repeatedly denied that he had any involvement with or knowledge of the Adopted Plan. For example, Rangel testified that neither he nor anyone acting on behalf of UNO:

- **Had Any Involvement In Drawing Any Congressional District(s):** Rangel specifically testified that unlike, the extensive map drawing exercise that he and others undertook to proffer Latino majority or influence districts for the state legislative map, he did not engage in *any* similar exercise of drawing any draft Congressional districts as part of the redistricting process for the Congressional maps. *Id.* at 49:7-20; *see also id.* at 60:23-61:4. Rangel further testified that he did not “engage[e] in a Congressional district map process” leading up to UNO taking a position vis-à-vis the Congressional map. *Id.* at 52:5-18.
- **Conducted No Specific Analysis of Any Aspect of a Congressional Reapportionment Plan:** Even in endorsing the concept of “one Congressional district” containing a Latino majority, Rangel admitted that neither UNO nor anyone acting on UNO’s behalf sat down and “crunched the numbers” of what the specific demographic information or political data were, or particular lines were drawn of District 4. Rangel Dep. 65:21-66:7.
- **Had No Specific Knowledge of Any Demographic Information Which Would Serve As the Underpinnings of a Congressional Reapportionment Plan:** In fact, apart from the “common knowledge that there’s been a population growth within the Latino community in the state of Illinois” based on census information, Rangel testified that he did not look at any other demographic information related to any population changes in Illinois relative to the Congressional redistricting process. *Id.* at 53:4-17. Rangel further stated that he was unaware of anybody acting on behalf of UNO who reviewed any demographic information related to

¹ According to his testimony, Rangel has been the Chief Executive Officer of UNO for the last fifteen years. Rangel Dep. 11:4-13, Oct. 6, 2011.

population in Illinois in connection with a Congressional redistricting process. *Id.* at 53:24-54:5.

- **Did Not Conduct Any Analysis or Otherwise Had Knowledge About Racial Bloc Voting, Effectiveness of Any District, or Any Knowledge or Views about “Influence” Districts As They Pertain to the Congressional Reapportionment Plans:** Rangel also testified that neither he nor UNO or anyone acting on UNO’s behalf engaged in any racial bloc voting analysis with respect to anything related to Congressional redistricting in 2010 or 2011. Rangel Dep. 55:9-15; *see also id.* at 57:3-8. For that matter, Rangel testified that he had no “specific knowledge” as to whether any elected officials from Springfield conducted any kind of racial bloc voting analysis related to the Congressional redistricting process. *Id.* at 61:5-20. According to Rangel, neither he, nor UNO, or anyone acting on UNO’s behalf conducted any kind of analysis that attempted to determine the effectiveness of any Latino majority district related to Congressional redistricting. *Id.* at 57:12-23.

In addition, Rangel testified that he was not aware of any specific analysis of Latino voting patterns in Northern Illinois “in attempting to shape a Congressional district” conducted by UNO or any of the other Latino constituency organizations during the Congressional redistricting process. *Id.* at 70:1-6. Further, Rangel admitted that neither he, nor UNO, conducted any kind of analysis to determine the percentage of voting age population necessary to have an effective district for Latinos in the context of Congressional redistricting. *Id.* at 71:9-72:18; *see also id.* at 72:19-73:20 (admitting that Rangel was not specifically aware of any analysis undertaken by any other Latino constituency organization regarding the percentage of voting age population required to have an effective district for Latinos in the context of Congressional redistricting).

- **Never Explored the Possibility of Two Viable Latino Congressional Districts:** Rangel testified that neither he nor UNO or anyone acting on UNO’s behalf conducted any analysis to determine whether or not, with respect to the Congressional redistricting, there could be drawn two Latino majority districts. *Id.* at 58:2-11; *see also id.* at 60:11-21 (testifying that neither he nor UNO or anyone acting on UNO’s behalf conducted any analysis to determine whether or not the two enclaves comprising the “earmuffs” of District 4 could be uncoupled to function as viable Latino districts).
- **Had No Knowledge of the Intent or Purpose of the Actual Drafters of the Adopted Plan:** Rangel also testified that he was not in consultation with any member of the Illinois House or Senate, nor any staff members of the Illinois House or Senate regarding UNO’s position as to one majority Latino Congressional district or any issue related to Illinois’ Congressional districts whatsoever. 75:22-76:12.

By his own admissions, Rangel has an opinion about the Adopted Plan that happens to align perfectly with his Democratic patrons, but is otherwise untethered from actual facts or data. Consequently, there is no basis to conclude that Rangel has any testimony which falls within the Rule 402 threshold of relevance and he should therefore be barred from testifying.

ARGUMENT

3. As this Panel is well aware, a court has the power to exclude evidence *in limine* as part of its inherent authority to manage trials. *Sachs v. Reef Aquaria Design, Inc.*, 2007 WL 3223336, at *2 (N.D. Ill. Oct. 25, 2007). Such motions should be granted if “the evidence is clearly not admissible for any purpose.” *Id.* Under FED. R. EVID. 402, “Evidence which is not relevant is not admissible.” As a result, it is proper for a court to grant a motion *in limine* to exclude evidence that is not relevant. *See, e.g., Ponce v. Tim’s Time, Inc.*, 2006 WL 941963, at *1 (N.D. Ill. Mar. 16, 2006) (granting motion *in limine* to exclude evidence of immigration status not relevant to FLSA claim); *Mason v. City of Chicago*, 641 F.Supp.2d 726, 729-30 (N.D. Ill. 2009) (evidence not relevant to damages was properly excluded from trial).

4. Evidence is relevant if it has “any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” FED. R. EVID. 401. Evidence “need not conclusively decide the ultimate issue in a case . . . but it must in some degree advance the inquiry.” *Gupta v. Board of Regents of University of Wisconsin System*, 63 Fed App’x 925, 928, (7th Cir. 2003) (quoting *E.E.O.C. v. Ind. Bell Tel. Co.*, 256 F.3d 516, 533 (7th Cir. 2001) and affirming district court’s grant of motion *in limine* on relevance grounds). Therefore, because Rangel’s deposition testimony is clear that he has no knowledge that could “advance the inquiry” related to the issues

set forth in this litigation, any evidence he attempts to offer is not relevant and thus not admissible.

5. Plaintiffs' race-related claims and Defendants' defenses turn on whether the Adopted Plan violates the U.S. Constitution and the Voting Rights Act. Thus, to be relevant and admissible, evidence presented must have a tendency to prove or disprove that: (1) the Adopted Plan violates the Equal Protection Clause because race was the predominant factor motivating the shape of Adopted District 4 and the gerrymandered district is not narrowly tailored to comply with any compelling interest; or (2) the Adopted Plan intentionally and unlawfully dilutes the votes of Latinos by packing Latinos into District 4, while it reduces the Latino population in neighboring Districts 3 and 5 to arrest the growing Latino community's influence over contests in those districts.

6. As set forth above, because Rangel repeatedly disclaimed any knowledge related to the above claims and defenses or any data analysis or any specific facts related to the Adopted Plan or, frankly, any aspect of the Congressional reapportionment process in Illinois in 2011, he can provide no relevant evidence and should be excluded as a witness.

CONCLUSION

WHEREFORE, for the foregoing reasons Plaintiffs request that the Court grant Plaintiffs' Motion *in Limine* to Exclude Juan Rangel as a witness for the Defendants.

Dated: November 10, 2011

Respectfully Submitted,

By: Lori E. Lightfoot

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John A. Janicik
Lori E. Lightfoot
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Attorneys for Plaintiffs

Exhibit A

Original Transcript

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

COMMITTEE FOR A FAIR AND
BALANCED MAP, JUDY BIGGERT,
ROBERT J. GOLD, RANDY HULTGREN,
ADAM KINZINGER, DONALD MANZULLO,
PETER J. ROSKAM, BOBBY
SCHILLING, AARON SCHOCK, JOHN M.
SHIMKUS, JOE WALSH, RALPH
RANGEL, LOU SANDOVAL, LUIS
SANABRIA, MICHELLE CABALLERO,
EDMUND BREZINSKI, and LAURA
WAXWEILER,

Plaintiffs,

vs.

1:11-cv-05065

ILLINOIS STATE BOARD OF
ELECTIONS, WILLIAM M. McGUFFAGE,
JESSE R. SMART, BRYAN A.
SCHNEIDER, BETTY J. COFFRIN,
HAROLD D. BYERS, JUDITH C. RICE,
CHARLES W. SCHOLZ, and ERNEST L.
GOWEN,

Defendants.

~~~~~

**VIDEOTAPED DEPOSITION OF**

**JUAN RANGEL**

October 6, 2011  
10:11 a.m.

Mayer Brown, LLP  
71 South Wacker Drive, Suite 3200  
Chicago, Illinois

LISA O'BRIEN, CSR No. 84-3822,  
a Certified Shorthand Reporter of the  
State of Illinois.



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Juan Rangel

October 6, 2011

1

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

COMMITTEE FOR A FAIR AND )  
BALANCED MAP, JUDY BIGGERT, )  
ROBERT J. GOLD, RANDY HULTGREN, )  
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PETER J. ROSKAM, BOBBY )  
SCHILLING, AARON SCHOCK, JOHN M. )  
SHIMKUS, JOE WALSH, RALPH )  
RANGEL, LOU SANDOVAL, LUIS )  
SANABRIA, MICHELLE CABALLERO, )  
EDMUND BREZINSKI, and LAURA )  
WAXWEILER, )

Plaintiffs, )

vs. ) 1:11-cv-05065

ILLINOIS STATE BOARD OF )  
ELECTIONS, WILLIAM M. McGUFFAGE, ) DEPOSITION OF  
JESSE R. SMART, BRYAN A. ) JUAN RANGEL  
SCHNEIDER, BETTY J. COFFRIN, ) 10/6/11  
HAROLD D. BYERS, JUDITH C. RICE, )  
CHARLES W. SCHOLZ, and ERNEST L. )  
GOWEN, )

Defendants. )



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Juan Rangel

October 6, 2011

2

1           The videotaped deposition of JUAN RANGEL,  
2       called for examination, taken pursuant to the  
3       Federal Rules of Civil Procedure of the United  
4       States District Courts pertaining to the taking of  
5       depositions, taken before LISA O'BRIEN, CSR  
6       No. 84-3822, a Certified Shorthand Reporter of the  
7       State of Illinois, at Suite 3200, 71 South Wacker  
8       Drive, Chicago, Illinois, on the 6th day of October,  
9       A.D. 2011, at 10:11 a.m.

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October 6, 2011

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1 PRESENT:

2 MAYER BROWN, LLP,

3 (71 South Wacker Drive,

4 Chicago, Illinois 60606,

5 312-701-7093), by:

6 MS. LORI LIGHTFOOT,

7 appeared on behalf of the Plaintiffs;

8 TRISTAN & CERVANTES,

9 (30 West Monroe Street, Suite 630,

10 Chicago, Illinois 60603,

11 312-345-9200), by:

12 MR. HOMERO TRISTAN,

13 MS. KERRY REIDY,

14 appeared on behalf of Juan Rangel;

15 POWER ROGERS & SMITH, P.C.,

16 (Three First National Plaza,

17 70 West Madison Street, 55th Floor,

18 Chicago, Illinois 60602,

19 312-236-9381), by:

20 MR. DEVON C. BRUCE,

21 appeared on behalf of the Defendants.

22 ALSO PRESENT: MR. JOSEPH CERULLO, VIDEOGRAPHER.

23 REPORTED BY: LISA O'BRIEN, C.S.R.

24 CERTIFICATE NO. 84-3822.



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1 THE VIDEOGRAPHER: This is Videotape Number 1  
2 of the videotaped deposition of Juan Rangel in the  
3 matter of The Committee for Balanced Map versus  
4 ISBOE, being heard before the U.S. District Court  
5 for the Northern District of Illinois, Eastern  
6 Division, Case File Number 11 C 5065.

7 This deposition is being held at Mayer  
8 Brown, 71 South Wacker Drive, Chicago, Illinois, on  
9 October 6, 2011. The time showing on the video is  
10 10:11 a.m. My name is Joseph Cerullo. I am the  
11 legal video photographer. The court reporter is  
12 Lisa O'Brien.

13 Counsel, would you please identify  
14 yourselves for the record?

15 MR. BRUCE: Devon, D-e-v-o-n, Bruce on behalf  
16 of the Defendants.

17 MS. LIGHTFOOT: Lori Lightfoot on behalf of the  
18 Plaintiffs.

19 MR. TRISTAN: Homero Tristan on behalf of Juan  
20 Rangel.

21 MS. REIDY: Kerry Reidy on behalf of Juan  
22 Rangel.

23 THE VIDEOGRAPHER: Will the court reporter  
24 please swear the witness.



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Juan Rangel

October 6, 2011

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1 (WHEREUPON, the witness was duly  
2 sworn.)

3 JUAN RANGEL,  
4 called as a witness herein, having been first duly  
5 sworn, was examined and testified as follows:

6 EXAMINATION

7 BY MS. LIGHTFOOT:

8 Q. Good morning, Mr. Rangel.

9 A. Good morning.

10 Q. We will try to get through this  
11 deposition as expeditiously as possible today. Let  
12 me start by, kind of, giving you some rules of the  
13 road for deposition, which I think will, hopefully,  
14 make the process easier for you and for the lawyers  
15 who are gathered here.

16 Let me first ask, have you ever been  
17 deposed before?

18 A. Yes.

19 Q. Okay. How many times?

20 A. One.

21 Q. Okay. And how long ago was that, sir?

22 A. About a month and a half ago, two months  
23 ago.

24 Q. Okay. Can you give me, again, in very



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Juan Rangel

October 6, 2011

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1 high level, the reason why you were deposed about a  
2 month and a half ago?

3 A. It was an employment issue at our  
4 schools.

5 Q. Okay. You probably then got some feel  
6 for the back and forth of the deposition, but let me  
7 give you a couple of reminders then. One of the  
8 most important things is, you see that the court  
9 reporter is taking down a verbatim transcript of  
10 everything that is going to be said here today.  
11 There are a couple of rules that follow from the  
12 fact that there is a verbatim transcript. The first  
13 is that it's important for you and for me not to  
14 talk over each other. It's a little artificial,  
15 because the way that people normally communicate,  
16 you get the gist of what somebody is saying, you  
17 respond, and there's a back and forth, and that's  
18 normal conversation mode. But in this context with  
19 the deposition, it's important that you let me  
20 finish answering -- asking the question, and by the  
21 same token, you -- I will let you fully answer  
22 before you begin -- before I begin asking you any  
23 follow-up. Do you understand that?

24 A. Yes.



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October 6, 2011

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1           Q.       The other thing that's important is that  
2       you must answer the questions verbally. And by  
3       that -- again, it's a little artificial, because  
4       when we talk to people in normal conversation, you  
5       use body language, you nod your head, you shrug your  
6       shoulders. You may do other non-verbal responses.  
7       But in this context, it's important that you  
8       actually respond verbally. Everyone forgets. If  
9       you forget, I will remind you. I am sure your very  
10      able Counsel will remind you if you forget. But  
11      that's another important rule.

12                   There may be from time to time objections  
13      that are interposed, either from Mr. Bruce or from  
14      your Counsel, to a question that I might ask. That  
15      is kind of standard fare. Lawyers have a right to  
16      object if they think there's some kind of  
17      imperfection with the question. Two things about  
18      that. One, don't be bothered by that, because it  
19      will happen. Two, if someone objects, and unless  
20      your lawyer instructs you not to answer a question,  
21      then you are still obligated to answer the question.

22                   As a matter of course, I have never  
23      seen -- a witness, particularly one who hasn't  
24      testified a lot, if there are objections, will



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1 sometimes tend to forget what the question is, and  
2 that's why we have a verbatim transcript. You can  
3 either have the question read back to you or I can  
4 restate it. So don't be thrown off by the fact that  
5 there may be objections. But two, if you forget the  
6 question, that's also fine, too, because I can  
7 either restate it or we can have the court reporter  
8 read it back.

9 If there's something about a question  
10 that I ask you that you don't understand, then feel  
11 free to tell me that you don't understand it. I may  
12 press you a little bit and ask you what part you  
13 don't understand or why you don't understand it.  
14 But this is not a memory test. It's not a guessing  
15 game. It's just to get what you know as you sit  
16 here today, and what your recollection is. If I ask  
17 a question, though, in such a way that you don't  
18 understand it, feel free to say, I don't understand  
19 it, and then we will try to work through that  
20 together.

21 You, obviously, have Counsel here, and  
22 you should feel free to consult with your Counsel at  
23 any point. My only request, though, is that if  
24 there's a question pending, that you answer the



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1 question first, and then ask your Counsel whatever  
2 you want. But, obviously, if you can't answer the  
3 question without consulting with your Counsel, you  
4 should just let me know that, and then -- clearly,  
5 that is your right as a witness, to consult with  
6 your Counsel.

7 It is certainly my objective to stay away  
8 from anything -- and I say this more for your  
9 lawyers than for you -- but to stay away from  
10 anything that might even remotely impinge upon  
11 attorney/client privilege. I know you are a  
12 litigant in the State redistricting case. I am  
13 going to ask you very little about that; and,  
14 frankly, not even about the case itself. I am going  
15 to ask you about some of your testimony through the  
16 public hearing process. But otherwise, it's  
17 certainly my hope that I am not going to get into  
18 anything that even comes close to attorney/client  
19 privilege. But, obviously, if you think it does,  
20 you will let me know, and then we can, again, work  
21 together on either me reasking it, or you will make  
22 your objection.

23 I don't expect our time here today to be  
24 particularly long, which is probably a welcome news



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1 for you, as I said before the deposition started,  
2 but I do think it will probably be somewhere between  
3 one hour and two hours. And I will try to keep it  
4 more on the one-hour side than on the two-hour side.  
5 Obviously, I don't know what questions, if any,  
6 Mr. Bruce may have.

7 That's all a prelude to say, if you need  
8 to take a break, feel free to take a break. And  
9 again, my only request would be that if there's a  
10 question pending, answer the question, and then you  
11 can take a break.

12 I have said a lot to you here today, and  
13 you have been very patient in listening. Is there  
14 anything that I have said that you don't understand?

15 A. No.

16 Q. Do you have any -- otherwise have any  
17 questions for me?

18 A. No questions.

19 Q. Is there any reason why you can't provide  
20 truthful testimony to the questions that are going  
21 to be put to you here today?

22 A. No.

23 Q. All right. Then let's begin.  
24



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Juan Rangel

October 6, 2011

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1 (WHEREUPON, there was a short  
2 interruption.)

3 BY MS. LIGHTFOOT:

4 Q. All right. You are the chief executive  
5 officer of United Neighborhood Organization; is that  
6 correct?

7 A. Yes.

8 Q. For purposes of today, I am going to use  
9 the shorthand UNO, and I assume you will know what I  
10 mean. Is that all right?

11 A. Yes.

12 Q. How long have you been the CEO at UNO?

13 A. Fifteen years.

14 Q. Okay. And can you tell us, sir, as the  
15 job is now, what your specific responsibilities  
16 entail as the CEO of UNO?

17 A. It's the day-to-day management of the  
18 organization, although, a large part of the  
19 organization is managing our charter school  
20 operation, which is -- now encompasses 11 schools,  
21 5,400 students across the city. And so most of it  
22 has to do with that; the overseeing the academic  
23 program, the finances, obviously, human resources,  
24 the operations of the organization --



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Juan Rangel

October 6, 2011

12

1 Q. Okay.

2 A. -- which include the schools.

3 Q. And can you tell me, sir -- obviously,  
4 the charter school mission is a substantial amount  
5 of what UNO does.

6 Aside from that, can you tell me, are  
7 there any other programatic areas that UNO is  
8 invested in at this point?

9 A. Well, the overall mission of the  
10 organization is the empowerment of Hispanic  
11 communities, and that would entail leadership  
12 development programs that we operate, and then just  
13 a host of other programs that are part of the  
14 schools, like after-school programs, and things like  
15 that, that support the school; looking at issues  
16 relevant to our community, whether it's housing  
17 issues, employment issues, immigration issues.

18 Q. Okay. And I assume -- and you will  
19 correct me if I am wrong -- that UNO is a 501(c)(3)  
20 organization?

21 A. Yes.

22 Q. And I would imagine you rely in part on  
23 fundraising and donations from outside of the  
24 organization itself. Is that correct?



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Juan Rangel

October 6, 2011

13

1 A. Yes.

2 Q. Okay. Does UNO have any lobbying  
3 operation?

4 A. Within the organization?

5 Q. Well, whether -- let's put it this way:  
6 Does UNO either directly or do you hire someone to  
7 engage in lobbying on behalf of the various  
8 programatic issues with respect to UNO?

9 MR. BRUCE: Object to the form. Go ahead.

10 BY THE WITNESS:

11 A. We have had -- we have had attorneys that  
12 have represented us in Government. We do advocacy  
13 work with our parents as well, depending on the  
14 issue at hand.

15 BY MS. LIGHTFOOT:

16 Q. I guess what I was asking is -- and I  
17 didn't ask a very good question, as Mr. Bruce, I  
18 think, pointed out.

19 Let's say in 2010 and 2011, does UNO have  
20 anyone acting on its behalf as a registered lobbyist  
21 under the laws of the State of Illinois?

22 A. I am going to assume that they are -- the  
23 people that we have engaged as consultants within  
24 the organization are registered lobbyists within the



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1 State of Illinois.

2 Q. Okay. And are those individuals engaged  
3 in doing any lobbying in Springfield, which is the  
4 capital?

5 A. Do they do that? I assume that that's  
6 what they do, yes.

7 Q. Okay. I take it then, sir, that the  
8 folks that are engaged on behalf of UNO doing  
9 lobbying in Springfield are not directly reporting  
10 in to you; is that right?

11 A. They do at times. It depends on what the  
12 project may be.

13 Q. Okay.

14 A. So sometimes I am engaged directly with  
15 them. Other times it's -- might be other staff.

16 Q. Okay.

17 A. Depending on what the issue may be.

18 Q. Okay. For example, is there any -- in  
19 the same time period, 2010, 2011 -- does UNO -- has  
20 UNO advocated on behalf of any particular  
21 legislation that's either been introduced or  
22 potentially introduced down in Springfield?

23 A. Yes.

24 Q. Okay. And can you give me a sense of



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1 what those various pieces of legislation might be?

2 A. I guess more recently was the Senate Bill  
3 7, which was the education bill that was passed.  
4 There's been looking at funding formulas for  
5 schools, for education as well. I don't know that  
6 there was a particular bill for those.

7 I am trying to think between 2010, 2011.  
8 So yes, there's been --

9 Q. Okay. I am going to ask you both because  
10 of the outside noise -- you can probably hear the  
11 ambulance that seems to be going by -- but also your  
12 voice is a little low -- I am sure it's my bad  
13 hearing -- but if you could just keep your voice up  
14 a little bit.

15 A. Absolutely.

16 Q. So you told us that you were -- you,  
17 meaning UNO, was involved in advocating on behalf of  
18 Senate Bill 7, which was the education bill.

19 A. Uh-huh.

20 Q. And is that -- I will show my ignorance.  
21 But is that the bill that got a huge amount of press  
22 about changing the school day, strike rules, and  
23 other things? Is that the one you are talking  
24 about?



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1 A. Correct.

2 Q. Okay. Any other, kind of, legislative  
3 initiatives regarding Springfield that UNO has been  
4 involved in during the, kind of, 2010/2011  
5 legislative cycle?

6 A. Legislative and -- I guess I am just  
7 trying to get clarity on legislative, as in  
8 specific --

9 Q. As in Springfield; not, for example, Cook  
10 County Board, or not the City of Chicago. But just  
11 things that would be pending in front of either  
12 chamber of the General Assembly.

13 MR. BRUCE: Objection, form.

14 BY THE WITNESS:

15 A. Certainly during the remap discussions.

16 BY MS. LIGHTFOOT:

17 Q. Okay. And we will talk a little bit  
18 about those.

19 Anything else besides the education bill  
20 and then the remap discussion?

21 A. No. I am trying to think.

22 Again, there were -- we were looking at  
23 the education funding formula that was separate from  
24 SB 7, but it didn't materialize into any specific



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1 legislation.

2 Q. Okay. All right. Let me show you what  
3 we can mark as Exhibit 1.

4 MR. BRUCE: Are you going to mark this as a  
5 group exhibit, Lori?

6 MS. LIGHTFOOT: Correct.

7 (WHEREUPON, a certain document was  
8 marked Rangel Deposition Exhibit  
9 No. Group 1, for identification, as  
10 of 10/6/11.)

11 BY MS. LIGHTFOOT:

12 Q. Sir, you have just been handed what's  
13 been marked as Rangel Exhibit Number 1.

14 And so the record is clear, the first  
15 page of this multi-page document has the -- your  
16 name written on top -- and I will ask you whether  
17 that's your handwriting or not -- and it has  
18 "Proposed Districts."

19 And then the next page is RD 1. The next  
20 page is RD 2. The next page is also RD 2. The next  
21 page is RD 23. The next page is RD 24, RD 3, RD 4,  
22 RD 39, RD 40, RD 60, RD 43, RD 77, RD 83. And then  
23 the last page is "Proposed West Chicago District."

24 And these are a series of maps; is that



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1 correct, sir?

2 A. Correct.

3 Q. Have you seen these maps before?

4 A. They look very familiar. Yes.

5 Q. Okay. In the top right-hand corner of  
6 the first page, there's handwriting there that  
7 spells your name, Juan Rangel.

8 A. Correct.

9 Q. Is that your handwriting, sir?

10 A. No.

11 Q. Are you otherwise familiar with that  
12 handwriting?

13 A. No.

14 Q. Okay. Are these, sir, maps that UNO and  
15 some other allied groups proposed to either the  
16 House or Senate Redistricting Committees as they  
17 were considering reapportionment of the General  
18 Assembly districts?

19 MR. TRISTAN: Objection, form.

20 MR. BRUCE: Objection, foundation.

21 BY THE WITNESS:

22 A. I believe so.

23 BY MS. LIGHTFOOT:

24 Q. Okay. And again, this is not a trick



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1 question.

2 You testified at various hearings, public  
3 hearings that were held, both before and -- well,  
4 you testified during the spring at various public  
5 hearings that were held by both the Senate and House  
6 redistricting committees, correct?

7 A. Correct.

8 Q. And then you also similarly testified  
9 before both committees after the General Assembly  
10 produced a draft -- or a proposed, I should say, map  
11 for both House districts and Senate districts; is  
12 that correct?

13 A. Correct.

14 Q. And as part of your testifying in these  
15 various public hearings, UNO and some other groups  
16 with whom UNO was aligned proposed certain  
17 districts; is that right, sir?

18 A. Correct.

19 Q. And what you have in front of you as  
20 Group Rangel Exhibit Number 1 were some proposed  
21 districts that UNO and others put together as part  
22 of that process; is that correct?

23 A. Correct.

24 Q. All right. Let me ask you a couple



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1 questions then about these maps.

2 Who was involved in the drawing of these  
3 maps on behalf of UNO?

4 MR. BRUCE: I object to the relevancy, to the  
5 extent that we are here on the Federal map the  
6 Congressional map. Now we are getting into details  
7 of the State Legislative redistricting. And so I  
8 would object as to relevance and scope as to this  
9 deposition.

10 MS. LIGHTFOOT: Okay.

11 BY MS. LIGHTFOOT:

12 Q. You may answer, sir.

13 A. We were -- there's several of us, myself  
14 included, and then our staff, Alfred Quijano --

15 Q. I'm sorry, say again.

16 A. Alfred Quijano.

17 Q. Quijano?

18 A. Quijano, Q-u-i-j-a-n-o, and when we were  
19 looking at the populations for the State map  
20 districts.

21 Q. Okay. In drawing these maps, did you --  
22 you or either Mr. Quijano or anybody else that was  
23 involved, have any assistance from anybody else?

24 MR. BRUCE: Same objection as to scope of



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1 relevancy, as to asking questions of this witness in  
2 this case about State Legislative redistricting maps  
3 and districts.

4 MR. TRISTAN: Same objection.

5 MS. LIGHTFOOT: And -- go ahead.

6 MR. BRUCE: I haven't finished. And to the  
7 extent that this is going to continue, I will have a  
8 standing objection on that. And I don't know how  
9 long Mr. Rangel's Counsel is going to allow this to  
10 go on, but I object because we are here on the  
11 Congressional map.

12 MR. TRISTAN: We have the same objection as  
13 well.

14 MS. LIGHTFOOT: Go ahead.

15 MR. TRISTAN: And Mr. Rangel will be produced  
16 for a deposition in that matter in the next week.

17 MS. LIGHTFOOT: Fair enough. I think it's  
18 relevant to the Congressional map, but you can  
19 certainly have a standing objection, Mr. Bruce. I  
20 was actually going to suggest it.

21 And certainly, Mr. Hamero, if you have a  
22 standing -- or I'm sorry, Tristan -- if you have a  
23 standing objection, you can make it. But I will tie  
24 it into this particular litigation.



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1 I have now forgotten the question. I  
2 know you nodded your head.

3 MR. BRUCE: That was your last question, Lori.  
4 You were done.

5 MS. LIGHTFOOT: Mr. Bruce, if you would give me  
6 a moment, please.

7 MR. BRUCE: That was a stab at levity.

8 MS. LIGHTFOOT: Why don't we go back and read  
9 the question, because I have now forgotten it myself  
10 after this long colloquy.

11 (WHEREUPON, the record was read by  
12 the reporter.)

13 BY THE WITNESS:

14 A. When you say "Assistance," assistance in  
15 terms of understanding the computer, and how to  
16 operate it or --

17 BY MS. LIGHTFOOT:

18 Q. We can start with that question.

19 A. There was a staff person that was  
20 present.

21 Q. And who was the staff person?

22 A. I don't know. I don't know the name.

23 Q. Was this staff person at UNO?

24 A. No.



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1 Q. A staff person from what entity or  
2 organization?

3 A. From the State.

4 Q. From the State?

5 A. Uh-huh.

6 Q. Again, you have to answer verbally.

7 A. Yes. I'm sorry.

8 Q. When you say "From the State," what do  
9 you mean?

10 A. I believe there was -- the State made  
11 available computers to the public to be able to draw  
12 our own maps, as we saw fit, for our community. And  
13 so at that time, the only ones, as far as I  
14 understood, that was available was down in  
15 Springfield. So we would travel down there to  
16 access those computers. But there was always a  
17 staff person there present as we were working on the  
18 computers.

19 So the level of assistance was them  
20 explaining how to draw what you -- how to manipulate  
21 the computer to be able to do what we needed to do.  
22 But at no time did they assist us in the physical  
23 drawing of the maps.

24 Q. All right. Let me make sure I understand



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1 the distinction you are drawing.

2 So from time to time, you and others  
3 would travel to Springfield and meet with some State  
4 employee; is that correct?

5 A. We would have to go in and, kind of,  
6 register --

7 Q. Okay.

8 A. -- to use the computers.

9 Q. Okay.

10 A. And the -- and so there would be a staff  
11 person that would be present.

12 Q. Okay. And where would you actually  
13 physically go to, to use their computers?

14 A. I don't remember -- I don't remember the  
15 room number. It was in the Stratton building.

16 Q. Okay.

17 A. And -- I just don't remember the number.

18 Q. How is it that you knew that you could go  
19 there, to Springfield, to be able to access a  
20 computer to draw a map?

21 A. I believe it was announced that there  
22 would be that access. And there was also announced  
23 that -- of, hopefully, a similar room here in  
24 Chicago, but we never used the Chicago one.



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1 Q. Okay. Was there a reason why you  
2 traveled to Springfield as opposed to using a  
3 computer here in Chicago?

4 A. I don't know that it was available at the  
5 time.

6 Q. Okay. That would make the trip worth it,  
7 I guess, then.

8 And was there -- when you -- how many  
9 times did you go -- you personally go to Springfield  
10 to use the -- what I will call the map-drawing  
11 equipment?

12 A. I don't recall. It might have been  
13 twice.

14 Q. Okay.

15 A. We spent several hours in the room. But  
16 I -- we were down there several times. But the  
17 actual sitting in the room, it might have been two  
18 times. But I can't recall exactly.

19 Q. In the two times that you remember going  
20 down to Springfield, sitting in the -- what I will  
21 call the map-drawing room, were -- was there anyone  
22 else present, aside from you and -- I am assuming it  
23 was Mr. Quijano that were there?

24 A. One time our attorney was present.



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1 Q. Okay. Aside from the time that your  
2 attorney was present, was there anybody not directly  
3 affiliated with UNO, i.e., either you, Mr. Quijano,  
4 or your attorney, that was actually present in the  
5 room?

6 A. No, just the staff person.

7 Q. Okay. And was it the same staff person  
8 both times that you were there?

9 A. No. I think it was just people that were  
10 available at the time or that were there stationed.  
11 And so --

12 Q. All right. Okay. And do you remember  
13 the name of any of the staff people who were there  
14 when you were there?

15 A. No.

16 Q. Can you tell me what -- can you tell me  
17 whether it was male or female?

18 A. Female.

19 Q. Female?

20 A. Both times it was female.

21 Q. And can you describe what -- and was it a  
22 different female or the same female?

23 A. A different female.

24 Q. Okay. Let's call Female One, maybe, the



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1 female that was there the first time that you can  
2 recall.

3 Can you describe what she physically  
4 looked like?

5 A. I don't recall.

6 Q. Was she, from your perception, White,  
7 Black, Latino, Asian?

8 A. White.

9 Q. Okay. Can you give me a sense of what  
10 her age was?

11 A. No. I am really bad with age.

12 Q. We won't call on you to do a lineup then.  
13 Hair color?

14 A. I believe one of them was blond. I can't  
15 recall which one was --

16 Q. Fair enough.

17 A. I believe one was blond, and the other  
18 one might have been brunette.

19 Q. Okay. And both white females; is that  
20 correct?

21 A. Yes.

22 Q. All right. That's fine.

23 Take a look at Exhibit 1. If you look at  
24 the second page, for example, you have -- and this



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1 is a, kind of -- information that's repeated on the  
2 various maps themselves, except for the one on the  
3 first page, I believe.

4 There's a legend on the left-hand side.  
5 Do you see that, sir?

6 A. Uh-huh.

7 Q. And then there's a heading that says  
8 "Existing." Do you see that, sir?

9 A. Uh-huh.

10 Q. Again, you have to answer verbally.

11 A. Yes. I'm sorry.

12 Q. Then there's a heading that says  
13 "Proposed." Do you see that, sir?

14 A. Yes.

15 Q. And then under both the Proposed and the  
16 Existing, there's what I will call demographic  
17 information. For example, the headings are Total  
18 Pop, Raw DEV -- and I will ask you what that  
19 means -- Hispanic Pop, Hispanic Percentage, Total  
20 Voting Age, Hispanic Voting Age, and Hispanic Voting  
21 Age Percentage.

22 Do you see that, sir?

23 A. Yes, sir.

24 Q. What's the source of the information



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1 under the column of Existing on these maps?

2 A. If I recall, the way the software -- why  
3 we had to go to Springfield, because of specific  
4 software for mapping purposes. And I found it to be  
5 unique in the sense that you have the existing  
6 boundaries of a particular district, but it would  
7 give you the population that exists within that.  
8 And so those figures would represent that. And as  
9 we would shift the lines, looking to try to capture  
10 the number that is needed, the total numbers would  
11 change over time.

12 Q. Okay. So if I am hearing you  
13 correctly -- and let's stick with page 2, which is  
14 RD 1. Once you would, kind of, zero in on the  
15 geographic area that you were going to focus on for  
16 a particular map, the computer program would  
17 automatically load it up with this -- what I will  
18 call demographic information under Existing, and  
19 then under Proposed; is that correct?

20 A. Correct.

21 Q. Okay. So to the extent that that  
22 information exists on other maps within Exhibit 1,  
23 it was the same kind of process? You would figure  
24 out what the geographic boundaries were of a



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1 particular map, and then the computer would  
2 automatically generate it and spit it out to you; is  
3 that correct?

4 A. Correct.

5 Q. Okay. Now, in looking at the maps for  
6 which there are demographic information -- and I  
7 should back up because I don't know this.

8 A number of these maps have the header  
9 RD, and then a number that follows. What does the  
10 "RD" represent?

11 A. I am not sure. Maybe it's Representative  
12 District.

13 Q. Okay.

14 A. I am not sure.

15 Q. Okay. That's fine. As I said before,  
16 it's not a guessing game. I just wanted the record  
17 to be complete, and I recalled that I hadn't asked  
18 you about that.

19 There are a number of these districts,  
20 and I think there are 13 in total. Is that  
21 consistent with your recollection?

22 A. I believe so.

23 Q. All right. There are some of these  
24 districts that have majority Latino population and



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1 voting age population, correct?

2 A. Correct.

3 Q. And then there are some -- actually, one  
4 more, 7, which are less than 50 percent Hispanic  
5 voting age.

6 MR. TRISTAN: Objection, vague, and foundation.

7 BY MS. LIGHTFOOT:

8 Q. Is that correct, sir?

9 MR. BRUCE: At this point I am going to make  
10 another objection with respect to getting into the  
11 details now of -- you have gone beyond the process,  
12 and now you are asking about the details of State  
13 Legislative representative districts. And I wasn't  
14 aware, but apparently, according to Mr. Rangel's  
15 Counsel, if I understood what the objection was, he  
16 is going to be deposed on this in the near future --

17 MR. TRISTAN: Correct.

18 MR. BRUCE: -- in a different lawsuit. And I  
19 am not involved in that lawsuit, and -- but I do  
20 object as to the scope and relevancy of this -- in  
21 this case, of asking about now majority, minority,  
22 and whatever demographic information you are going  
23 to start asking about with respect to State  
24 Legislative districts.



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1           And I am -- I am grasping to understand  
2           how that could have any relevance to a case  
3           involving a Congressional map. And I think at this  
4           point it's becoming abusive and harassing to the  
5           witness, because he's going to be deposed on these  
6           issues --

7           MS. LIGHTFOOT: He certainly looks harassed and  
8           abused.

9           MR. BRUCE: I guess that's your stab at levity.

10           But I do feel strongly that we are  
11           getting pretty far afield from the issues that are  
12           raised in the Plaintiffs' complaint.

13           So maybe, Lori, if you could articulate  
14           on the record why you think it's relevant in this  
15           case, and -- you know, because I don't want to be  
16           here going through all of this when he's going to be  
17           deposed in the near future on these matters.

18           MS. LIGHTFOOT: Well, I will, if you -- if you  
19           are finished with your objection, we will be quickly  
20           getting to why I think it's relevant in about three  
21           questions.

22           MR. TRISTAN: And my objection continues. And  
23           to the extent that we will permit this line of  
24           questioning, at some point, though, we are going to



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1 have to get back to the issue that we are here. So  
2 on that note -- if I can finish --

3 MS. LIGHTFOOT: Sure. Please.

4 MR. TRISTAN: -- we will allow those three  
5 questions, and hopefully we will get to, you know --  
6 I am not waiving any future objections to any of  
7 those three questions, but certainly to the extent  
8 that soon after that we better -- we should arrive  
9 at the reason that we were brought here.

10 MS. LIGHTFOOT: Well, if we can dispense with  
11 the paragraph-long speaking objections, we will  
12 probably get there relatively quickly.

13 MR. TRISTAN: Is that one of your questions,  
14 Counsel?

15 MS. LIGHTFOOT: Sorry, Mr. Tristan?

16 MR. TRISTAN: Is that one of the three  
17 questions?

18 MS. LIGHTFOOT: Pardon me?

19 MR. TRISTAN: Continue.

20 MS. LIGHTFOOT: Is that your attempt at  
21 sarcasm, sir?

22 MR. TRISTAN: Sorry?

23 MS. LIGHTFOOT: Is that your attempt at  
24 sarcasm?



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1 MR. TRISTAN: Perhaps. But you can continue.

2 MS. LIGHTFOOT: Can we go back to the question  
3 that was pending before we went off on this little  
4 frolic and detour? I don't know that I got an  
5 answer to my question.

6 (WHEREUPON, the record was read by  
7 the reporter.)

8 MR. TRISTAN: Objection, foundation.

9 BY MS. LIGHTFOOT:

10 Q. Sir, if you take a look at -- and I will  
11 highlight them for you -- Exhibit 1. Look, for  
12 example, page 3, which is RD 2.

13 Do you see that, sir?

14 A. Uh-huh. Yes.

15 Q. And the -- in the column that says  
16 Proposed -- do you see that?

17 A. Yes.

18 Q. There's a -- the very last column, it  
19 says "Hispanic voting age percentage," and it says  
20 49.3 percent, correct?

21 A. Correct.

22 Q. And if you look at the -- let's see.

23 If you look at, several pages in,  
24 RD 40. Do you have that one in front of you, sir?



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1 A. Yes.

2 Q. Also on the Proposed, it has a Hispanic  
3 voting age percentage of 48.17 percent. Do you see  
4 that, sir?

5 A. Correct.

6 Q. And if you turn to the next page, RD 60,  
7 under Proposed, that has Hispanic voting age  
8 percentage of 49.3 percent. Do you see that, sir?

9 A. Correct.

10 Q. And then similarly, RD 43 has Hispanic  
11 voting age percentage of 49.05 percent, correct?

12 A. Correct.

13 Q. And the next one, RD 77, has Hispanic  
14 age -- sorry, Hispanic voting age percentage of  
15 48.32 percent, correct?

16 A. Correct.

17 Q. And RD 83, which is the next page, has  
18 Hispanic voting age percentage of 49.49 percent,  
19 correct?

20 A. Correct.

21 Q. And then the final page of this exhibit,  
22 Proposed West Chicago District, has a proposed  
23 Hispanic voting age percentage -- or has a Hispanic  
24 voting age percentage of 46.81 percent, correct?



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1 A. Correct.

2 Q. By the way, just on -- so the record is  
3 clear, on the last page, this Proposed Chicago  
4 District, unlike the other districts that are  
5 contained in this exhibit, doesn't appear to have  
6 any demographic information on Existing; is that  
7 correct?

8 A. Correct.

9 Q. Do you know why that is?

10 A. Because --

11 MR. BRUCE: Objection. I'm sorry. Objection,  
12 foundation. Go ahead.

13 BY MS. LIGHTFOOT:

14 Q. Do you know why that is, sir?

15 A. The district doesn't exist.

16 Q. So this was a brand new district that UNO  
17 and the other folks with you were proposing,  
18 correct?

19 A. Correct.

20 Q. Now, are you familiar with the term  
21 "Cross-over district"?

22 MR. BRUCE: Objection, foundation.

23 BY THE WITNESS:

24 A. Yes.



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1 BY MS. LIGHTFOOT:

2 Q. And, in fact, you testified about that  
3 term in your various testimony before the  
4 redistricting committees in the hearings this  
5 spring; is that correct?

6 MR. BRUCE: Objection, relevancy, foundation.

7 BY THE WITNESS:

8 A. That's correct.

9 BY MS. LIGHTFOOT:

10 Q. How do you -- when you were testifying  
11 about cross-over districts, can you tell us what you  
12 meant by "Cross-over districts"?

13 MR. TRISTAN: Objection.

14 MR. BRUCE: Foundation, relevancy.

15 MR. TRISTAN: And again, Counsel, I think with  
16 respect to cross-over districts, to the extent that  
17 cross-over districts are relevant in Federal  
18 litigation, with Congressional maps my objection  
19 stands. And I assume that we are going to get very  
20 quickly to the reason that we are here for the  
21 Congressional litigation.

22 MS. LIGHTFOOT: I think we are here.

23 BY MS. LIGHTFOOT:

24 Q. Can you answer my question, sir? And if



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1 you don't have it in mind, we can have it read back.

2 MR. BRUCE: Same objections.

3 (WHEREUPON, the record was read by  
4 the reporter.)

5 BY THE WITNESS:

6 A. In what context? What was -- what was  
7 the question that was asked?

8 BY MS. LIGHTFOOT:

9 Q. You testified -- you made comments about  
10 majority Latino districts; is that correct, sir?

11 A. Probably.

12 Q. Okay. And you also used the term  
13 "Cross-over districts," correct?

14 A. Uh-huh. Probably.

15 Q. When you -- what I am asking is, when you  
16 used the term "Cross-over district," what did you  
17 mean that -- what did you mean by that?

18 MR. BRUCE: Objection to the extent it calls  
19 for a legal conclusion, foundation, and relevancy in  
20 this Federal case.

21 BY THE WITNESS:

22 A. I don't recall having used the word  
23 "Cross-over." I may have. And what I probably  
24 meant, if I used that word -- that phrase, is



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1 looking at areas that are -- maybe influence  
2 districts, not majority -- vast majority Latino, in  
3 our case, what we were looking at.

4 And so it might have meant that looking  
5 at areas that had more of a -- not -- not a super  
6 majority or majority, but had enough influence  
7 within -- within the district.

8 BY MS. LIGHTFOOT:

9 Q. And when you say "Had enough influence  
10 within the district," what do you mean by that, sir?

11 MR. BRUCE: Same objection.

12 MR. TRISTAN: Same objection.

13 MR. BRUCE: I'm sorry, I didn't mean to  
14 interrupt. I am objecting to the extent that it  
15 calls for a legal conclusion. I would further  
16 object based on foundation of this witness to  
17 testify to that. And I would object on relevancy  
18 with respect to asking questions about State map --

19 MS. LIGHTFOOT: I am not asking questions about  
20 the State map. I am asking questions about his  
21 understanding of these terms which, as you know,  
22 Mr. Bruce, are applicable in the context of the  
23 Congressional redistricting and reapportioning  
24 cases.



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1 MR. BRUCE: If he knows. Go ahead.

2 BY MS. LIGHTFOOT:

3 Q. Let me reask the question.

4 Since you used the term "Influence within  
5 a district," what did you mean by that, sir?

6 MR. BRUCE: Objection, foundation.

7 BY THE WITNESS:

8 A. At no time did I use those words in  
9 reference to any Congressional --

10 BY MS. LIGHTFOOT:

11 Q. I am asking you --

12 A. -- district.

13 Q. -- what -- just so we are clear -- and  
14 I'm sorry to interrupt you.

15 You just used that term about ten seconds  
16 ago, excising out the objections. And what I want  
17 to know is what you mean by that.

18 A. As it pertains to the State maps.

19 Q. As it pertains in any concept -- in any  
20 context that you would use the term "Influence  
21 within a district."

22 MR. BRUCE: Objection, foundation, form,  
23 relevancy.

24 MR. TRISTAN: Objection, vague.



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1 BY THE WITNESS:

2 A. Again, as it pertains to a State map --  
3 because I assume -- I am a little confused as to  
4 what we are discussing here. But when we were  
5 looking at the State maps -- if that's what we are  
6 talking about now -- looking at areas -- I think our  
7 position was always not losing the gains that we  
8 have made over the last ten years.

9 There is a possibility of adding on  
10 influence areas within a district. So some of the  
11 districts that you pointed out that don't have a  
12 majority Hispanic voting age, clearly, there's a  
13 community of interest there; not enough,  
14 necessarily, to elect a Hispanic, I guess you can  
15 say, but enough to have their interests in some way  
16 looked at.

17 BY MS. LIGHTFOOT:

18 Q. Okay. You -- I have read a lot of your  
19 testimony from the various hearings, and there's one  
20 phrase that you used a lot, and I just want to read  
21 that to you, to help you contextualize it. And this  
22 is drawn from a May 21st hearing of the Senate  
23 Redistricting Committee. It's a public hearing that  
24 was held here in Chicago.



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1 MR. TRISTAN: If you will allow us to also get  
2 to the same page. We have brought those transcripts  
3 as well.

4 MS. LIGHTFOOT: In fact, we can just mark it.

5 MR. TRISTAN: That might be easier.

6 MS. LIGHTFOOT: Mark it as 2.

7 (WHEREUPON, a certain document was  
8 marked Rangel Deposition Exhibit  
9 No. 2, for identification, as of  
10 10/6/11.)

11 BY MS. LIGHTFOOT:

12 Q. Sir, you now have before you what's been  
13 marked as Rangel Exhibit Number 2. As you see from  
14 the first page, this is a transcript of a public  
15 hearing that was held before the 2011 Illinois State  
16 Senate Redistricting Committee on May 21st here in  
17 Chicago.

18 And I am going to direct you to what is  
19 numbered page 15. And if you look at the preceding  
20 page on page 14, you are introducing yourself as the  
21 CEO of UNO, Latin Coalition for Fair Redistricting.

22 I am going to ask you about the next  
23 page, which is lines 6 through 12. And it reads,  
24 quote, "I am here to express the Latino Coalition



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1 for Fair Redistricting support of the map proposed  
2 by the Illinois Senate. We stand by our consistent  
3 position that we need to protect the Latino  
4 community's means over the past two decades, and  
5 also expand our representation based upon our  
6 population growth."

7 Do you see that, sir?

8 A. Uh-huh. Yes.

9 Q. You have to answer verbally.

10 So this was a statement, this, kind of,  
11 opening stanza, if you will, that you made at a  
12 number of public hearings, both before and after  
13 there were any maps that were introduced; is that  
14 correct?

15 MR. TRISTAN: Objection, foundation, vague.  
16 Please be specific as to for which maps.

17 MR. BRUCE: I join in the objection.

18 BY MS. LIGHTFOOT:

19 Q. Did you make this statement more than  
20 once, sir, in the context -- and again, if you want  
21 to -- we can spend time going through all of the  
22 various parts -- but it looks like you had written  
23 testimony, and you made this statement a number of  
24 times.



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1 A. I --

2 MR. BRUCE: I don't even know if that's a  
3 question. I object to the form.

4 BY MS. LIGHTFOOT:

5 Q. Go ahead, sir.

6 A. I don't mean any disrespect to court  
7 reporters, but I don't think the word "Means" is  
8 correct. I might have said Latino community's  
9 gains --

10 Q. Okay.

11 A. -- over the past two decades.

12 But if this is what it says, I guess this  
13 is what I said at the time.

14 Q. And is it correct, sir, that the Latino  
15 Coalition for Fair Redistricting that you were a  
16 part of had two primary objectives in looking at  
17 redistricting in Illinois, whether it was the State  
18 map or the Congressional map?

19 MR. TRISTAN: Objection, vague.

20 MS. LIGHTFOOT: Sir, I haven't even asked the  
21 question.

22 MR. TRISTAN: I am already confused. Sorry.

23 MS. LIGHTFOOT: Apparently. Let me ask the  
24 question. Then you can interpose your objection.



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1 MR. TRISTAN: Please start the question over.

2 BY MS. LIGHTFOOT:

3 Q. Sir, was it the case that the Latino  
4 Coalition for Fair Redistricting had two primary  
5 objectives with respect to the redistricting process  
6 in Illinois, whether it was the State map or the  
7 Congressional map? One was to protect the Latino  
8 community's gains over the past two decades? Was  
9 that one of the objectives, sir?

10 MR. TRISTAN: Objection.

11 MR. BRUCE: Objection to the form. It's  
12 compound. You are now asking about both the  
13 Congressional and State. You are muddling the  
14 issues. He never testified to that. You haven't  
15 asked him what his involvement in the Congressional  
16 maps was at all. And so I object. That  
17 mischaracterizes his testimony. I object to the  
18 foundation and relevancy.

19 MR. TRISTAN: Same objection as to compound. I  
20 lost track after the third question. So if you can  
21 just narrow it down to one per question.

22 MS. LIGHTFOOT: Re-read my question back,  
23 please. I want an answer to that.

24



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1 (WHEREUPON, the record was read by  
2 the reporter.)

3 BY THE WITNESS:

4 A. Again, I think we took a very -- very  
5 specific position on the State map. And what you  
6 have in front of me here is my testimony for State  
7 Senate Redistricting Committee public hearing. And  
8 there were -- there were, actually, several other  
9 points. It was also ensuring that the civil rights  
10 of other minority groups were respected.

11 BY MS. LIGHTFOOT:

12 Q. Okay.

13 A. I think those were the three points that  
14 we would always make as it pertains to the State  
15 maps.

16 Q. Well, UNO has taken a position with  
17 respect to the Congressional map; isn't that  
18 correct, sir?

19 A. Yes.

20 Q. And your position was that, in effect,  
21 you were satisfied with only having one majority  
22 Latino district as proposed by the Springfield  
23 Democrats, correct?

24 A. Correct.



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1 Q. And my question, sir, was, with respect  
2 to -- let's talk about the Congressional map  
3 specifically. With respect to the Congressional  
4 map -- well, let me back up.

5 With respect to the State map, you have  
6 said -- and the Exhibit 2 that we have in front of  
7 you -- was that there were three objectives now.  
8 And let me make sure that I have got them right.  
9 One was to protect the Latino community's gains over  
10 the past two decades. Was that one of the  
11 objectives with respect to the State map?

12 A. Correct.

13 Q. The other was to expand the Latino  
14 community's representation based upon the population  
15 growth that occurred over the past decade here in  
16 Illinois; is that correct?

17 A. Correct.

18 Q. And sounds like there was a third  
19 objective, which was to make sure that the rights  
20 and objectives of other minority groups in the state  
21 were also respected; is that correct?

22 A. Correct.

23 Q. With -- keeping those three objectives in  
24 mind, sir, were those objectives the same or



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1 different with respect to the Congressional  
2 redistricting process that ensued here in Illinois?

3 A. Well, it's apples and oranges. And I  
4 think those are two different processes --

5 Q. Okay.

6 A. -- in terms of what we are trying to --  
7 in terms of the objectives. And the three that you  
8 just mentioned, the three objectives, were very  
9 specific to our State remap position.

10 Q. Did you have any specific objectives with  
11 respect to the Congressional redistricting process,  
12 sir?

13 A. We never undertook a process with the  
14 Congressional maps as we did with the State.

15 Q. Okay.

16 A. We did take a position, but it wasn't  
17 through a process like we had done with the State  
18 maps, of drawing maps, or anything like that.

19 Q. So let me explore that a little bit more.

20 When you say that "We never undertook a  
21 process," with respect to the Congressional map,  
22 what specifically are you referring to, sir?

23 A. Drawing maps and -- like we did very  
24 specific work that was done with the State maps.



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1 Q. Okay. Let's explore that a little bit.

2 So, for example, sir -- and this is -- I  
3 am going to try to do a compare and contrast; what  
4 you did with the State map versus what you did or  
5 didn't do with respect to the Congressional map.

6 Obviously, as we put in front of you with  
7 Exhibit 1, you undertook the process of going down  
8 to Springfield, drawing some particular districts,  
9 and then proposing those districts as part of the  
10 public hearing process, correct?

11 A. Correct.

12 MR. BRUCE: Objection to form.

13 BY MS. LIGHTFOOT:

14 Q. Did you engage in any similar exercise of  
15 drawing any draft Congressional districts as part of  
16 the redistricting process for the Congressional  
17 maps?

18 MR. BRUCE: I'm sorry. Same objection.

19 BY THE WITNESS:

20 A. No.

21 BY MS. LIGHTFOOT:

22 Q. Okay. Did you, sir -- and again, looking  
23 at the demographic information that is on the  
24 Exhibit 1 that we put in front of you.



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1 I take it that you -- I will ask you.  
2 Did you, for purposes of the 13 districts that you  
3 drew which are embodied in Exhibit 1, did you review  
4 any specific demographic information, other than  
5 what was, kind of, automatically put in on the  
6 maps -- let me ask a better question.

7 Aside from the demographic information  
8 that is reflected on the maps that are embodied in  
9 Exhibit 1, did you -- and I mean you, Mr. Rangel --  
10 and I will ask you another question -- but did you  
11 review any other demographic information about the  
12 State of Illinois State districts?

13 MR. BRUCE: Objection, form, foundation, and  
14 relevancy.

15 BY THE WITNESS:

16 A. You lost me there.

17 BY MS. LIGHTFOOT:

18 Q. Okay. Take a look at Exhibit 1.

19 A. Uh-huh.

20 Q. And look at the second page. Do you have  
21 that, sir?

22 A. Yes.

23 Q. All right. As we established earlier,  
24 there's two columns; Existing and Proposed. Do you



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1 see that, sir?

2 A. Yes.

3 Q. On the -- and there's certain demographic  
4 information; Total Pop, Hispanic Pop, Voting Age,  
5 and so forth. Do you see that, sir?

6 A. Correct.

7 Q. Aside from having this information  
8 reflected on the maps that were drawn -- and it  
9 sounds like it was automatically generated by the  
10 computer once you printed the map; is that correct?

11 A. Correct.

12 Q. Aside from seeing this information that  
13 was automatically generated by the software program  
14 that was used to draw these particular maps, did you  
15 otherwise review any other demographic information  
16 as part of your State map-making exercise?

17 MR. TRISTAN: Objection as to relevance with  
18 respect to the processes that were used for the  
19 drawing of the State map.

20 MR. BRUCE: Same objection.

21 BY THE WITNESS:

22 A. For the purpose of the -- drawing the  
23 State maps --

24 BY MS. LIGHTFOOT:



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1 Q. Correct?

2 A. -- as we found it? Not specifically, no.

3 Q. Okay. So then let's shift gears and talk  
4 about the Congressional.

5 I take it then, sir -- but you will tell  
6 me -- did you look at any specific demographic  
7 information as -- on -- related to any Congressional  
8 maps leading up to UNO taking a position vis-a-vis  
9 the Congressional map?

10 MR. BRUCE: Objection to the form. Go ahead.  
11 BY THE WITNESS:

12 A. To the degree that we did for the State  
13 maps, no.

14 BY MS. LIGHTFOOT:

15 Q. To any degree?

16 A. Just general population numbers that we  
17 know, but not -- not in terms of engaging in a  
18 Congressional district map process.

19 Q. Okay. And --

20 MR. BRUCE: Lori, if you can wait until the  
21 witness finishes his answer before you begin the  
22 next one, I think that's appropriate.

23 MS. LIGHTFOOT: I didn't know that I was  
24 interrupting the witness, sir.



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1 BY MS. LIGHTFOOT:

2 Q. When you say general population numbers,  
3 what are you referring to, sir?

4 A. Well, I think that's common knowledge  
5 that there's been a population growth within the  
6 Latino community in the state of Illinois.

7 Q. So you are talking about, kind of,  
8 general census information about the growth in the  
9 Latino population here in Illinois; is that correct?

10 A. Correct.

11 Q. All right. Aside from that kind of  
12 general census information about the growth in  
13 Latino population in Illinois, did you look at any  
14 other demographic information related to any  
15 population changes in Illinois relative to the  
16 Congressional redistricting process?

17 A. No.

18 MR. TRISTAN: Objection.

19 BY MS. LIGHTFOOT:

20 Q. And let me broaden the question just --  
21 and I think I know what the answer is, but let me  
22 just make sure.

23 Aside from what you personally may have  
24 done, are you aware of anybody acting on behalf of



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1 UNO who reviewed any demographic information related  
2 to population in Illinois in connection with a  
3 Congressional as opposed to a State redistricting  
4 process?

5 A. No.

6 Q. Okay.

7 (WHEREUPON, discussion was had off  
8 the record.)

9 BY MS. LIGHTFOOT:

10 Q. Let me shift gears and ask you some other  
11 questions, sir.

12 Are you familiar with the term "Racial  
13 block voting"?

14 MR. BRUCE: Objection, foundation.

15 BY THE WITNESS:

16 A. Yes, I guess. It's almost  
17 self-explanatory.

18 BY MS. LIGHTFOOT:

19 Q. Well, okay.

20 How is it that you are familiar with the  
21 term "Racial block voting"?

22 MR. BRUCE: Same objection.

23 BY THE WITNESS:

24 A. I don't know that I am familiar with it.



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1 I think it's, again, just those words put together  
2 means something. I don't know that I can say I  
3 learned it here or there.

4 I assume it means that there's votes  
5 based on a certain race that vote in a certain way.

6 BY MS. LIGHTFOOT:

7 Q. Okay. I won't confirm that that's  
8 accurate or not. But let me ask this question then:  
9 Did you -- and I am talking about you personally --  
10 engage in any racial block voting analysis with  
11 respect to anything related to Congressional  
12 redistricting in 2010 or 2011?

13 MR. TRISTAN: Objection, foundation.

14 BY THE WITNESS:

15 A. No.

16 MR. BRUCE: Same objection.

17 BY MS. LIGHTFOOT:

18 Q. Okay. Did anyone acting -- did UNO  
19 itself or did it cause any racial block voting  
20 analysis to be conducted related to the  
21 Congressional redistricting process in either 2010  
22 or -- hold on, sir -- let me just finish asking the  
23 question -- in either 2010 or 2011?

24 MR. BRUCE: Objection, form.



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1 MR. TRISTAN: Objection as to the form.  
2 Objection as to asked and answered in that the  
3 witness has stated that he was not involved in the  
4 process.

5 MS. LIGHTFOOT: I asked him about him  
6 personally, and now I asked about the organization  
7 or anybody acting on the organization's behalf.  
8 BY MS. LIGHTFOOT:

9 Q. Do you have that question in mind or  
10 should I restate?

11 A. Restate it.

12 Q. Just so you are clear, the way I am going  
13 to ask these questions is what you personally did --

14 A. Sure.

15 Q. -- and then I am going to ask what UNO  
16 did or anybody acting on UNO's behalf. So that's  
17 the dichotomy. So the topic -- each topic that I go  
18 into will have two parts to it.

19 A. Sure.

20 Q. What you know -- what you may have done  
21 personally, and what UNO did. You understand that  
22 distinction?

23 A. Yes.

24 Q. Let me go back.



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1 I previously asked you about what you did  
2 or didn't do regarding racial block voting analysis.

3 My question then, sir, is, are you aware  
4 of whether or not either UNO or anyone or entity  
5 acting on behalf of UNO conducted any racial block  
6 voting analysis related to the Congressional  
7 redistricting process in either 2010 or 2011?

8 A. No.

9 Q. Okay. Same, kind of, two-part question.  
10 And the topic is the effectiveness of any Latino  
11 district. So that's the topic.

12 The question is whether or not you  
13 personally conducted any kind of analysis which  
14 attempted to determine the effectiveness of any  
15 Latino majority district related to Congressional  
16 redistricting.

17 A. No.

18 Q. All right. Same topic. The question is,  
19 did UNO or anyone acting on behalf of UNO conduct  
20 any kind of analysis regarding the effectiveness of  
21 any Latino majority district related to  
22 Congressional redistricting.

23 A. No.

24 Q. Slightly different topic, but similar to



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1 the last one.

2 Did you conduct any analysis to determine  
3 whether or not, with respect to the Congressional  
4 redistricting, there could be drawn two Latino  
5 majority districts?

6 A. No.

7 Q. Did UNO, or anyone acting on behalf of  
8 UNO, undertake any analysis to determine whether or  
9 not there could be drawn two Latino majority  
10 districts in the Congressional context?

11 A. No.

12 Q. All right. Did you conduct any analysis  
13 to determine -- well, let me back up and set the  
14 foundation.

15 You are familiar with Congressional  
16 District 4, correct?

17 A. Uh-huh. Yes.

18 Q. And you understand Congressional District  
19 4 to be a Congressional district that, for the last  
20 20 years, has been represented by Congressman  
21 Gutierrez, correct?

22 A. Correct.

23 Q. Are you aware that -- that the  
24 Congressional District 4 is sometimes referred to as



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1 an earmuff?

2 A. Correct.

3 Q. Okay. So I am going to use that term. I  
4 just want to make sure that you understood it.

5 With respect to the earmuff, did you  
6 conduct any analysis to determine whether or not the  
7 two Latino enclaves that are connected by the  
8 connector could be uncoupled to have viable Latino  
9 districts?

10 MR. TRISTAN: Objection, asked and answered.

11 MR. BRUCE: Objection to the form and  
12 foundation. Go ahead, sir.

13 BY THE WITNESS:

14 A. Could you repeat the first part of the  
15 question?

16 BY MS. LIGHTFOOT:

17 Q. Sure. Let me lay a little more  
18 foundation so the question is a little more  
19 comprehensible.

20 You are familiar with the earmuff,  
21 correct?

22 A. Uh-huh. Yes.

23 Q. And you are aware, sir, are you not, that  
24 the earmuff, the connector piece, essentially



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1 connects a Hispanic enclave -- Latino enclave  
2 district on the North side of Chicago with a Latino  
3 enclave district on the South side of Chicago,  
4 correct?

5 A. Correct.

6 Q. And you are familiar with the fact that  
7 Congressman Davis' district kind of goes through the  
8 middle of those two enclaves, like a cigar, so to  
9 speak, correct?

10 A. Correct.

11 Q. Okay. What -- my question is whether or  
12 not you conducted any analysis to determine whether  
13 or not those two enclaves could be uncoupled, and  
14 function as viable Latino districts.

15 A. No.

16 Q. My second part of that question: Did UNO  
17 or anyone acting on behalf of UNO conduct any  
18 analysis to determine whether or not those two  
19 Latino enclaves could be uncoupled to create Latino  
20 districts?

21 A. No.

22 Q. All right. Now, you have told me, in  
23 effect, that neither you personally nor UNO did any  
24 of the kind of extensive analysis on the



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1 Congressional districts that was performed by UNO  
2 and yourself vis-a-vis the State Legislative  
3 districts; is that correct?

4 A. Correct.

5 Q. Let's say prior to -- prior to the end of  
6 June of this year, okay, were you aware of whether  
7 or not any elected officials from Springfield  
8 conducted any kind of racial block voting analysis  
9 related to the Congressional redistricting process?

10 A. Not specifically, no.

11 Q. Because you qualified it, I will have to  
12 follow up.

13 What do you mean by "Not specifically,"  
14 sir?

15 A. Well, you said if I was aware.

16 Q. Yes.

17 A. I wasn't aware. I assumed that there's  
18 analysis that's being done as the State is  
19 conducting its business of drawing remaps, but I  
20 don't have any specific knowledge to it.

21 Q. Okay. All right. And let me make sure  
22 that I am clear.

23 So what you are, in essence, saying is  
24 you made an assumption that somebody was probably



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1 doing it, but you don't have any particular  
2 knowledge one way or the other; is that correct?

3 A. Correct.

4 Q. All right. UNO came out and supported  
5 the Congressional map that was passed by the General  
6 Assembly and signed into law by the Governor; is  
7 that correct?

8 A. I don't know that it was -- the  
9 Congressional map --

10 Q. That's what I am talking about.

11 A. -- specifically?

12 I think our position was in support of  
13 one Congressional district.

14 Q. Okay.

15 A. I am not sure about the specific map as  
16 it's delineated throughout. But the concept of one  
17 Congressional district is what we stood behind.

18 Q. And in fair point, I didn't mean to  
19 overstate what your endorsement was.

20 So in other words, UNO has taken a  
21 position that it supports the CD 4 as it is  
22 reflected in the map that was passed by the General  
23 Assembly and signed into law by the Governor,  
24 correct?



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1           A.     Again, it's -- I don't know that we took  
2     a position specifically to the map that was  
3     approved. I think our position was the concept of  
4     one Congressional district.

5           Q.     Are you finished?

6                 Okay. I don't want to be accused of  
7     interrupting you.

8                 All right. So let me ask it a different  
9     way then, and make sure we are both on the same  
10    page.

11                What you are saying is that UNO came out  
12    in support of the concept of having one majority  
13    Latino district; is that correct?

14          A.     Correct.

15          Q.     But UNO has not taken a position with  
16    respect to the specific iteration of CD 4 that is in  
17    the -- in the map that was passed by the General  
18    Assembly and signed into law by the Governor; is  
19    that the distinction you are drawing?

20          A.     Yes, although, I think that we are  
21    satisfied with the map that was produced by the  
22    State because it followed the concept of one  
23    Congressional district.

24          Q.     Okay.



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1           A.     And all I am saying is in terms of the  
2     lines, where the lines are drawn, what streets and  
3     all that, it's -- we were happy that the State  
4     followed what we believe is the best -- in the best  
5     interest of our community at that time.

6           Q.     I'm sorry, go ahead.

7           A.     That's it.

8           Q.     And that is one majority Latino --

9           A.     Congressional district, yes.

10          Q.     Okay. In other words, you are not --  
11     neither you nor UNO are specifically endorsing the  
12     various line drawing that constitutes CD 4; is that  
13     correct?

14          A.     I don't want to come across like we are  
15     opposing it either.

16          Q.     No, I understand. You qualified it, so I  
17     just want to understand what the qualification  
18     means.

19          A.     I think our position was that this is our  
20     preference of having one Congressional district,  
21     along with a coalition of organizations that came  
22     together. Whether it was a specific endorsement of  
23     that map, I am not sure it was that either. But it  
24     wasn't like we were opposed to the map so --



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1 Q. I am just trying to get at -- let me just  
2 ask it directly, since we are on the topic.

3 Has UNO taken any specific position  
4 regarding the particular way in which CD 4, as  
5 reflected in the map that was passed and signed into  
6 law, have you taken any specific position as to that  
7 particular district, beyond the concept of, We  
8 support one majority Latino district?

9 A. I think our position was that we support  
10 the map that was passed by the State because it  
11 followed the concept. So it's kind of like -- I  
12 don't mean to be obtuse about it. It's just that  
13 the State passed a map, and even though we weren't  
14 looking at the specific lines, it followed the  
15 concept of one Congressional district, and we were  
16 satisfied with that.

17 So I guess in some way we were endorsing  
18 the map, without saying, This is the map that we  
19 want. It's the concept of one Congressional  
20 district.

21 Q. So in other words, in endorsing the  
22 concept -- let's stick with that -- of one  
23 Congressional district, it sounds like, based on the  
24 comments that you just made and our previous



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1 discussion about what analysis was done -- that UNO  
2 or anybody acting on behalf of UNO hadn't sat down  
3 and, you know, crunched the numbers, so to speak, of  
4 what the specific demographic information was,  
5 political data, or where particular lines may have  
6 been drawn; is that correct?

7 A. Correct.

8 Q. All right. Okay. I now understand what  
9 you were saying.

10 Tell me, sir, then why -- what was the  
11 basis for UNO's endorsement of the concept of one  
12 majority Latino Congressional district.

13 A. Sure. I think initially, just given the  
14 census figures in the state of Illinois, it's  
15 obvious the Latino community has grown.

16 Q. Sure.

17 A. And I think there's always been a desire  
18 to see more representation on the Congressional  
19 side.

20 But after having conversations with other  
21 organizations in terms of what the position ought to  
22 be, and try to present a united front on this topic,  
23 kind of, was a give-and-take, in trying to figure  
24 out what was best for our community. And as much as



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1 it would be great to see two, three, four or more,  
2 we settled on, kind of, the reality of voting  
3 patterns within our community, and feeling that --  
4 unfortunately, that if we followed those trends, we  
5 may lose the gains that we have made with having at  
6 least one Congressional representative.

7 And so we came to the conclusion that  
8 what was best at this time is to enhance that one  
9 Congressional district to ensure that we don't lose  
10 that. So that was the basis of our position.

11 Q. So you said a couple things there that I  
12 want to just follow up with you on.

13 You said something about, The reality of  
14 voting patterns within our community. What did you  
15 mean by that, sir?

16 A. Unfortunately, Latinos vote in very small  
17 numbers, and for different reasons. You have --  
18 could have a very large Latino population, but it  
19 may not be a voting population. It may not be  
20 eligible to vote.

21 And then you do have those that are  
22 eligible to vote that may not vote themselves. And,  
23 to me, that's kind of -- that's the certain reality  
24 that we need to contend with. And in our ambition



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1 to try to get more districts, are we actually  
2 diluting our strength that we have? So that was the  
3 logic that we used.

4 Q. Let me ask you this then: With respect  
5 to that concern about Latinos voting in small  
6 numbers, and the potential to lose gains that had  
7 come -- I am talking specifically about the  
8 Congressional process -- are you aware of whether or  
9 not any of the various groups that you were talking  
10 about in arriving at this discussion, are you aware  
11 that any of them had conducted any kind of specific  
12 voting analysis of how Latinos vote anywhere in  
13 Northern Illinois over any period of time?

14 A. I am not aware of a specific but, again,  
15 I am going to assume that some of them had.

16 Q. So beyond your assumption, in any of  
17 these conversations that you were having that led to  
18 the conclusion that you could endorse the concept of  
19 one Latino majority Congressional district, are you  
20 aware for a fact as to whether or not any of the  
21 various constituency groups that you were talking  
22 with had actually done any kind of analysis of  
23 Latino voting patterns in Northern Illinois -- and  
24 by that I mean city of Chicago, Cook, suburban Cook,



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1 at -- for any time period?

2 MR. BRUCE: Objection, foundation.

3 BY THE WITNESS:

4 A. There's groups that do this. There has  
5 been analysis that has been done. Was it done  
6 specifically for this discussion? That I am not  
7 aware of.

8 BY MS. LIGHTFOOT:

9 Q. Okay. And that was my question, whether  
10 or not somebody came and said, Hey, we have done  
11 this -- in other words -- I am, obviously, making it  
12 up, because I wasn't part of the discussion -- We  
13 have done this analysis of how Latinos vote in city,  
14 county, suburban Cook, DuPage County, anywhere else  
15 in Northern Illinois, and here is what the results  
16 were? Anything along that line that were part of  
17 the discussions that you were in?

18 A. Not specific to the Congressional -- no  
19 analysis -- I guess I should say I don't know that  
20 there were analyses that were done for the purpose  
21 of that discussion. But some of these organizations  
22 have histories of doing analyses and have expertise  
23 that we were relying on as well, and our own  
24 experiences within our communities.



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1 Q. Okay. But nothing that was specifically  
2 done, that you are aware of, of analysis of Latino  
3 voting patterns in Northern Illinois and the  
4 boundaries that I have defined?

5 A. Not in attempting to shape a  
6 Congressional district.

7 Q. Okay. All right.

8 Okay. Are you aware, sir, of whether or  
9 not either any of the -- and I am calling them  
10 constituency groups -- any of the groups that you  
11 were in discussion with regarding the Congressional  
12 redistricting process, did any kind of racial block  
13 voting analysis?

14 We have talked about you. We have talked  
15 about UNO. But I want to expand it now to any of  
16 the groups that you were talking about in either --  
17 talking with in either 2010 or 2011, did any kind of  
18 racial block voting analysis in the context of  
19 thinking about Congressional redistricting.

20 MR. BRUCE: Objection, asked and answered, and  
21 foundation. Go ahead.

22 BY THE WITNESS:

23 A. I am not aware of it. It's possible that  
24 they had in some of these groups. That's what they



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1 do.

2 BY MS. LIGHTFOOT:

3 Q. Again, this is just what you know, not  
4 what may have happened outside of your knowledge.

5 A couple more topics, sir.

6 Are you -- did you, you, Juan Rangel --  
7 this is actually going to be a three-part -- same  
8 topic, but three parts.

9 Did you, Juan Rangel, conduct any kind of  
10 analysis to determine what the percentage of voting  
11 age population would be needed to have an effective  
12 district for Latinos, and, again, in the context of  
13 Congressional redistricting?

14 A. No.

15 Q. Did any -- did UNO or anyone on behalf of  
16 UNO conduct such an analysis to determine,  
17 essentially, what's the threshold level that we  
18 could be at, under 50 percent, to have a Latino  
19 district that would be effective?

20 MR. BRUCE: Objection.

21 MR. TRISTAN: Objection, compound and vague.

22 MR. BRUCE: I'm sorry, objection, foundation,  
23 form. And I think it's seeking a legal conclusion.

24 But go ahead, if you know the answer --



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1 if you can answer.

2 BY THE WITNESS:

3 A. I am a little confused on the question.

4 BY MS. LIGHTFOOT:

5 Q. Fair enough. Let me restate it.

6 We talked at the very beginning of our  
7 discussion here this morning -- you used the term  
8 "Influence within a district." Do you remember  
9 that, sir?

10 A. Uh-huh.

11 Q. Okay.

12 A. Yes.

13 Q. What I am asking you is whether or not  
14 UNO or anyone on behalf of UNO conducted any kind of  
15 analysis to determine what the Latino voting age  
16 population percentage could be to have influence  
17 within any particular Congressional district.

18 A. No.

19 Q. All right. Same question, but I am going  
20 to expand it out to the universe of folks that you  
21 were talking with throughout this process.

22 In your discussions with these various  
23 constituency groups about the Congressional  
24 redistricting process, are you aware of whether or



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1 not there was anyone who had conducted an analysis  
2 to determine what the percentage of Latino voting  
3 age population could be in order for Latinos to have  
4 influence within a particular Congressional  
5 district?

6 A. Same as before, I am not aware of  
7 specifically but, again, I am assuming that because  
8 of the work that these -- some of these other  
9 organizations do, that they had done so; not  
10 necessarily for -- not necessarily for the  
11 Congressional map, perhaps, but I am not sure. But  
12 analysis has been done by some of these groups in  
13 the past.

14 Q. But as you sit here today, you are not  
15 aware of any specific analysis that was done along  
16 these lines, i.e., what's the threshold number that  
17 we can -- that we should have ideally for Latino  
18 voting age population, for Latinos to have influence  
19 within a particular Congressional district?

20 A. No.

21 Q. Okay.

22 MS. LIGHTFOOT: Why don't we take a quick break  
23 so the videographer can change the tape.

24 THE VIDEOGRAPHER: This is the end of Tape



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1 Number 1. We are going off the record at 11:26.

2 (WHEREUPON, a recess was had.)

3 THE VIDEOGRAPHER: This is the beginning of  
4 Tape Number 2. We are back on the record at 11:31.  
5 BY MS. LIGHTFOOT:

6 Q. Mr. Rangel, I asked you a series of  
7 questions about what, if any, analysis was done  
8 vis-a-vis any congressional districts by either you,  
9 UNO, and then I came back and asked you questions  
10 about the various constituency groups that you were  
11 talking with about the congressional process.

12 Just so I have tied up that topic area,  
13 since the map was -- the congressional map was  
14 signed into law in or about June of this year,  
15 have -- are you aware of -- have you conducted any  
16 kind of analysis related to the Congressional map at  
17 all?

18 A. No.

19 Q. Okay. Has UNO or anyone acting on UNO's  
20 behalf conducted any analysis of the Congressional  
21 map since it was signed into law by the Governor in  
22 June of this year?

23 A. No.

24 Q. All right. And similarly, are you aware



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1 of whether or not anyone has done any analysis of  
2 the Congressional map, aside from, obviously, the  
3 parties to this litigation, but aside from that, are  
4 you -- do you have any personal knowledge of whether  
5 or not anyone else has done any analysis of any kind  
6 related to the Congressional map since it was passed  
7 and signed into law in June of this year?

8 A. No.

9 Q. All right. Aside from the various  
10 constituency groups that you have talked about that  
11 you were in conversation with -- and I mean the  
12 broader you -- UNO and you personally were in  
13 conversation with -- leading up to the position that  
14 UNO ended up taking vis-a-vis the Congressional map,  
15 were you in consultation with any elected officials  
16 before UNO announced its support of the concept of  
17 one Latino majority Congressional district?

18 A. The only person that we spoke -- elected  
19 official that we spoke to regarding the  
20 Congressional district was Congressman Gutierrez.

21 Q. Okay. Aside from Congressman Gutierrez,  
22 for example, did you -- were you in consultation  
23 with any elected official -- any State-elected  
24 official -- by that I mean either a member of the



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1 Illinois House of Representatives or the Illinois  
2 Senate -- regarding UNO's position about the one  
3 majority Latino district?

4 A. No.

5 Q. Okay. Were you in contact with any staff  
6 person for any State-elected official?

7 Again, I am defining that as a member of  
8 the General Assembly. Were you in contact with any  
9 staff person of a General Assembly member about  
10 UNO's position regarding the one majority Latino  
11 district?

12 A. No.

13 Q. Okay. Aside from your Counsel, did you  
14 talk to anybody else about the fact that you were  
15 going to be called for a deposition in this case?

16 A. Aside from Counsel?

17 Q. Yes.

18 A. Like -- like --

19 Q. Anyone.

20 A. Just letting staff know that I am not  
21 going to be in today.

22 Q. Okay. I take it Pat is probably your  
23 assistant; is that correct?

24 A. Pardon me?



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1 Q. Is Pat your assistant or --

2 A. No.

3 Q. Okay. Did you say --

4 A. Other than the staff.

5 Q. I'm sorry, staff. I misheard you.

6 Okay. Other than staff, other than your  
7 Counsel, did you talk to anybody else about the fact  
8 that you were going to be deposed here today?

9 A. No. I don't recall.

10 Q. So, for example, did you meet with  
11 Mr. Bruce in advance of your deposition here today?

12 A. Oh, yes.

13 Q. When did you meet with Mr. Bruce?

14 A. Yesterday.

15 Q. And was that face to face or over the  
16 phone?

17 A. Face to face.

18 Q. And where did that meeting take place,  
19 sir?

20 A. In his office.

21 Q. Okay. Was that at your initiation or at  
22 Mr. Bruce's initiation, if you know?

23 A. That was -- I don't know -- I don't  
24 recall if it was our attorneys that worked on -- are



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1 working on this.

2 Q. And what did Mr. Bruce ask you about?

3 A. Asked -- it was more of -- kind of what  
4 this process is, what -- the deposition and what to  
5 expect, kind of thing.

6 Q. Okay. And did you talk about anything  
7 else with Mr. Bruce?

8 A. Other than -- I am not sure what your  
9 question is.

10 Q. Well, you just said that one of the  
11 things that you talked about with Mr. Bruce was what  
12 the deposition process was going to be like.

13 Did you talk about anything else with  
14 Mr. Bruce?

15 A. Outside of the deposition itself, no.

16 Q. Well, outside of that topic of what -- I  
17 take it what you are saying is that one of the  
18 things you talked about with Mr. Bruce was what it  
19 was going to be like to be deposed. Is that  
20 correct?

21 A. Correct.

22 Q. All right. Did you talk about anything  
23 related to the Congressional redistricting process  
24 itself with Mr. Bruce when you met with him



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1 yesterday?

2 A. Repeat the question again.

3 Q. We have talked a lot today about the --  
4 your knowledge or -- and maybe lack thereof, about  
5 the Congressional redistricting process, correct?

6 A. Correct. Uh-huh.

7 Q. Did you talk with Mr. Bruce when you met  
8 with him yesterday about anything related to the  
9 Congressional redistricting process?

10 A. We talked about the deposition. So the  
11 deposition is about the Congressional district. So  
12 yes, I guess.

13 Q. And what specifically did you talk about,  
14 sir?

15 A. Just kind of what to expect in terms of  
16 this process, and always told me to be truthful.

17 Q. Did you talk about any of the questions  
18 that we talked about here today?

19 A. We talked about possible questions that  
20 would be asked.

21 Q. Like what?

22 A. Some of the questions that you asked  
23 today.

24 Q. For example?



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1 A. Did we play any role in the Congressional  
2 district remap.

3 Q. Did you tell him anything different than  
4 you told me here today?

5 A. Pardon me?

6 Q. Did you tell him anything different than  
7 what you told me here today?

8 A. No.

9 Q. How long did you meet with Mr. Bruce?

10 A. Not very long. Twenty minutes, maybe.

11 Q. Okay. Aside from telling staff and  
12 talking to your attorneys, and meeting with the  
13 lawyer for the State, did you talk about your  
14 deposition with anybody else?

15 A. I don't believe so.

16 Q. Okay.

17 MS. LIGHTFOOT: Okay. I think that's all the  
18 questions I have for you.

19 THE WITNESS: Thank you.

20 EXAMINATION

21 BY MR. BRUCE:

22 Q. Mr. Rangel, you have no knowledge or  
23 information that any Congressional district map was  
24 drawn to discriminate against Latinos; is that true?



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1 A. That's correct.

2 Q. And as I understood your testimony here  
3 today, you would, in fact, disagree with that? You  
4 don't think it was drawn, based upon what you know,  
5 to discriminate against Latinos; is that correct?

6 A. Correct.

7 MS. LIGHTFOOT: Objection, foundation and  
8 mischaracterizes his testimony.

9 BY THE WITNESS:

10 A. Correct.

11 BY MR. BRUCE:

12 Q. I don't think I am mischaracterizing your  
13 testimony. Do you think the Latinos were  
14 discriminated against in the way the map was drawn?

15 A. No, we support the concept of one  
16 Congressional district, as was passed by the General  
17 Assembly and signed into law.

18 MR. BRUCE: That's all the questions I have.  
19 Thank you for your time here today.

20 MR. TRISTAN: I have no questions.

21 THE VIDEOGRAPHER: This concludes the  
22 deposition and ends Tape Number 2. We are going off  
23 the record at 11:40 a.m.

24 FURTHER DEPONENT SAITH NOT.



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CERTIFICATE OF OFFICER

I, LISA O'BRIEN, a Certified Shorthand Reporter of the state of Illinois, do hereby certify:

That previous to the commencement of the examination of the witness, the witness was duly sworn to testify the whole truth concerning the matters herein;

That the foregoing deposition transcript was reported stenographically by me, was thereafter reduced to typewriting under my personal direction and constitutes a true record of the testimony given and the proceedings had;

That the said deposition was taken before me at the time and place specified;

That I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action.



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1                   IN WITNESS WHEREOF, I do hereunto set my  
2           hand at Chicago, Illinois, this 17th day of October,  
3           2011.

4  
5  
6           *Lisa O'Brien Zurawski*  
7           C.S.R. Certificate No. 84-3822.



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WITNESS

EXAMINATION

JUAN RANGEL

By Ms. Lightfoot

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By Mr. Bruce

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DEPOSITION ERRATA SHEET

Our Assignment No. 278699

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION

COMMITTEE FOR A FAIR AND )

BALANCED MAP, et al., )

Plaintiffs, )

vs. ) No. 1:11-cv-05065

ILLINOIS STATE BOARD OF )

ELECTIONS, et al., )

Defendants. )

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of

\_\_\_\_\_, 20\_\_\_\_.

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October 6, 2011

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