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**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS, et al.,  
Plaintiffs,**

**3:21-CV-00259-DCG-JES-JVB**

**v.**

**2:20 p.m. to 6:01 p.m.**

**GREG ABBOTT, IN HIS OFFICIAL  
CAPACITY AS GOVERNOR OF THE  
STATE OF TEXAS, et al.,  
Defendants.**

**OCTOBER 2, 2025**

**INJUNCTION HEARING  
BEFORE THE HONORABLE DAVID C. GUADERRAMA  
HONORABLE JERRY E. SMITH  
AND HONORABLE JEFFREY V. BROWN  
AFTERNOON SESSION, DAY 2 OF 9 DAYS**

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Proceedings reported by court reporter. Transcript  
produced via computer-aided transcription.

Leticia D. Perez  
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10:02 1

**PROCEEDINGS**

2 JUDGE GUADERRAMA: All right. The witness, Ms. Young,  
3 on the witness stand.

4 Ms. Nwachukwu?

5

**TIFFINNI YOUNG,**

6 previously sworn by the Court, was examined and testified as  
7 follows:

8

**DIRECT EXAMINATION**

9

**BY MS. NWACHUKWU:**

10 Q. Good afternoon again, Ms. Young.

11 A. Good afternoon.

12 Q. So just to reorient you a bit before we continue with your  
13 testimony, where we left off before the lunch break, we were  
14 talking about the 2013 Congressional Map.

15 So now I want to show you the third image that's a  
16 part of Plaintiffs' Exhibit 219.

17 A. Yes.

18 Q. And for the record, I will represent to you that this is  
19 CD30 from the 2013 Congressional Map that you just looked at.  
20 And it's just overlaid onto Google Maps so that it'll be easier  
21 for you to identify geographical landmarks.

22 A. Okay.

23 Q. Now, Ms. Young, are you familiar with all of the areas that  
24 are shaded in yellow in the border of CD30?

25 A. Yes.

14:17 1 Q. How are you familiar with this area?

2 A. I've lived throughout the area, again, have worked in and  
3 around the area, and visited with friends and family in the  
4 area.

5 Q. Now, can you -- you have a pen in front of you. Can you  
6 first circle everywhere that you have lived on this map from  
7 2013 to 2022?

8 A. Yes. Okay. I have circled three areas.

9 Q. Okay. And for the record, we will put the image that you  
10 have circled onto the ELMO so that the Court can view it.

11 MS. NWACHUKWU: Your Honor, may we approach the  
12 witness?

13 JUDGE GUADERRAMA: Yes, ma'am.

14 A. It's not working, kind of, on this one. Okay.

15 Q. (BY MS. NWACHUKWU) Now, Ms. Young, it appears that you  
16 have circled three different areas within Congressional  
17 District 30 that you lived in under the 2013 map. Is that  
18 correct?

19 A. Yes.

20 Q. And starting with the first place that you lived in CD30,  
21 can you describe for the Court the area that you lived in under  
22 this map?

23 A. Yes. It went away. It is the one that kind of got messed  
24 up, where it says "Dallas." And it's kind of half circled  
25 there. The pen wasn't working. That's like Downtown Dallas.

14:20 1 I lived near the Farmers Market in Downtown Dallas. And we  
2 call it kind of the Mixmaster. Some of the highways come  
3 together there, so 45 and what we call 075 was kind of to  
4 the -- I guess the best -- I don't know. One side of my  
5 building. And then 30 bordered the other side. But near the  
6 Farmers Market, Downtown Dallas.

7 Q. And now looking at the map again, can you describe for the  
8 Court the second area that you circled within CD30?

9 A. Yes. The next place is up near Highway 30, and that was in  
10 a neighborhood called Buckner Terrace near Highway 30. And Jim  
11 Miller is the cross-street, or the exit.

12 Q. And now looking at the last circle on this image, can you  
13 describe for the Court where you lived when you were in this  
14 part of CD30?

15 A. Yes. That is where I currently live, and that is kind of  
16 the intersection of Military Parkway and Prairie Creek.  
17 Highway 80 and then 635 are like the border highways.

18 Q. Now going back to the first area that you lived in under  
19 this map, how would you describe that part of CD30?

20 A. At the time that I lived there, which was like 2013, early  
21 2014, you had people moving back into Downtown Dallas. Not as  
22 many residents in terms of living, as it is like now. Mixed  
23 population in terms of race. And urban area. Urban, downtown.

24 Q. Now, with the second area that you identified in CD30, how  
25 would you describe that area?

14:22 1 A. Urban. Near a high school, library. Families, lots of  
2 families. Predominantly -- mixed neighborhood, but  
3 predominantly Black and Hispanic.

4 Q. And now looking at the last area that you circled within  
5 CD30, how would you describe that area?

6 A. Again, a lot of single-family neighborhoods, schools,  
7 parks. Urban setting in the City of Dallas. And predominantly  
8 Black and Hispanic.

9 Q. Now looking at the image of CD30 as a whole, are you aware  
10 of any concentrations of Black residents within this image of  
11 CD30?

12 A. Yes.

13 Q. And let's just kind of take this map in smaller segments  
14 for the record.

15 So let's start with the area within CD30 that is north  
16 of I-30, so where it says "Dallas" on the screen going north.

17 A. Okay. It's hard to read some of the cities, but yes.

18 Q. So just for reference -- I won't write on this, but looking  
19 at this area here of the map (indicating)?

20 A. Yes. It's just hard to make out what some of the highways  
21 are. If I can have -- it's hard to make out what some of the  
22 areas are on a blown-up copy.

23 MS. COHAN: May I approach?

24 JUDGE GUADERRAMA: Yes, ma'am.

25 THE WITNESS: Thank you.

14:24 1 A. Okay, yes. Love Field Airport. Yes, I'm familiar.

2 Q. (BY MS. NWACHUKWU) Okay. And just to ask the question  
3 again for the record, in this part of CD30 that is north of  
4 I-30 that goes towards Love Field, can you identify or describe  
5 for the Court any concentrations of Black residents that live  
6 in that part of CD30?

7 A. Yes. There are some where, like, the green area is to the  
8 left of Dallas. West Dallas, Canada Drive. And that's an area  
9 that we call West Dallas, and there is a concentration there.

10 Q. Now looking towards the middle of the map for the area  
11 shaded in yellow between I-30 and I-20, can you identify any  
12 concentrations of Black residents in this portion of CD30?

13 A. Yes, quite a few areas. Joffey, Joppa is there on the map  
14 kind of in the middle. Freedman's Town, historic Freedman's  
15 Town, there's a concentration there. Over to the right,  
16 Military, Pleasant Grove. We call that Pleasant Grove. That's  
17 also the area in which I live. Concentration there.

18 Coming down to the left, over to the left, like  
19 Ledbetter Hills, Ledbetter Drive, Kiest, Oak Cliff area.  
20 Concentration there as well.

21 Q. And now looking at the area shaded in yellow for CD30 that  
22 is below I-20 to the bottom of the image, are you aware of any  
23 concentrations of Black residents within this part of CD30?

24 A. Yes. Those are suburbs. We call them South Suburbs. So  
25 Duncanville, DeSoto, Lancaster, Cedar Hill all have

14:26 1 concentrations. And then that Kleberg/Rylie area has a  
2 concentration there as well.

3 Q. Now, you described some parts of CD30 as being urban and  
4 suburban. Are there any parts of CD30 that you would describe  
5 as rural?

6 A. Kleberg/Rylie, I think, is becoming a little urban, but  
7 still has rural areas. I don't know the boundary in terms of  
8 like where Bar Springs is. Some of Bar Springs is still rural.  
9 I don't know how that cuts on this boundary, but some of Bar  
10 Springs is as well.

11 And then there's industrial and rural kind of in that  
12 Wilmer-Hutchins area.

13 Q. Now before we move on, looking at the area that is north of  
14 I-20 on this map, so about halfway through CD30, what is your  
15 understanding of the demographics of this area, again, that's  
16 north of I-20?

17 A. North of -- I would understand much of this area to be  
18 majority Black and Hispanic.

19 Q. And now looking at the area south of I-20, what is your  
20 understanding of the demographics in that part of CD30?

21 A. I would understand it to be predominantly African American,  
22 or Black.

23 Q. So now I want to put another set of maps in front of you.  
24 And this is Exhibit -- Plaintiffs' Exhibit 220.

25 MS. NWACHUKWU: Which, again, we have shared already

14:28 1 with the State. Your Honors, we have copies of this exhibit as  
2 well, and we'd also like to present a copy to the witness.

3 JUDGE GUADERRAMA: Yes, ma'am.

4 MS. NWACHUKWU: Okay.

5 THE WITNESS: Thank you.

6 Q. (BY MS. NWACHUKWU) Now Ms. Young, looking at the image  
7 that is on the screen -- and again, you have a copy of this in  
8 front of you as well -- what is this image that's on the  
9 screen?

10 A. U.S. Congressional Districts, Senate Bill 6 Conference  
11 Committee Report that was filed, and also known as Plan C2193.

12 Q. Now I will represent to you that this is ultimately the  
13 Congressional Plan that was enacted by the Legislature in 2021.

14 A. Okay.

15 Q. And I'm going to show you another image on the screen that  
16 you also have in front of you. And Ms. Young, what is this  
17 image on the screen?

18 A. Yes. This is, again, the Plan C2193 map with the Dallas  
19 County portion expanded, or made large.

20 Q. Are you familiar with this area that's reflected on the  
21 screen?

22 A. Yes.

23 Q. And how are you familiar with it?

24 A. I live in the area, have worked in and around the area.  
25 And, again, friends and family. Shopping.

14:30 1 Q. Now based on Plan C2193, what Congressional District did  
2 you live in?

3 A. On this one I was in Congressional District 32.

4 Q. Now I want to show you the last image as part of  
5 Plaintiffs' Exhibit 220. And I will -- now Ms. Young, I will  
6 represent to you that this is the entirety of CD32 in the map  
7 that you looked at before from the '21 -- 2021  
8 Congressional Map overlaid onto Google Maps.

9 Now Ms. Young, are you familiar with the areas that  
10 are shaded in yellow in this image?

11 A. Yes.

12 Q. And how are you familiar with this area?

13 A. I live in the bottom part of the shaded yellow, have worked  
14 throughout this area that's shaded in yellow.

15 Q. Now with the image that you have in front of you, can you  
16 circle the area that you lived in under CD32?

17 A. Yes. Yes. Yes, yes, I found it.

18 MS. COHAN: May I approach?

19 JUDGE GUADERRAMA: Yes.

20 THE WITNESS: Oh, thank you.

21 Q. (BY MS. NWACHUKWU) Now looking at the image of CD32  
22 that -- where you circled in red where you live, can you  
23 describe for the Court this area?

24 A. Yes. Pleasant Grove, single-family homes and predominantly  
25 Black and Hispanic community. Urban.

14:33 1 Q. And this home that you lived in under CD32, did you live in  
2 this location when you were located in CD30 in the previous map  
3 that we discussed?

4 A. Yes. This is the same home. I moved back to that home in  
5 2019.

6 Q. How would you describe the area of CD32 that you lived in?

7 A. Again, predominantly Black and Hispanic. Urban setting.

8 Q. And how would you describe CD32 as a whole in terms of  
9 being urban, suburban, or rural?

10 A. Mostly urban. It has some northern suburbs. And then a  
11 little bit of rural down at the bottom towards, like, Bar  
12 Springs. But Bar Springs is also a suburb of Dallas, City of  
13 Dallas.

14 Q. Now looking at the entirety of CD32, are there any  
15 concentrations of Black residents in this map?

16 A. Yes.

17 Q. And again, we'll walk through this segment by segment.

18 So looking at the area in this map, above 635 to the  
19 north, all the way to Plano at the top part of the district,  
20 can you identify for the Court any areas where there are  
21 concentrations of Black residents?

22 A. Definitely harder to identify concentrations. There are, I  
23 think, definitely Black families that live up that way, but in  
24 smaller numbers and smaller populations. I wouldn't  
25 necessarily characterize those areas as big populations of

14:35 1

Black people.

2

Q. Now looking a little more closely at this portion of CD32,  
3 are you familiar with the Richardson area?

4

A. Yes.

5

Q. And are you aware of any concentrations of Black residents  
6 living in that part of CD32?

7

A. Well, it's -- it kind of like splits Richardson and Dallas,  
8 that area that was historically -- like Hamilton Park that was  
9 historically Black, but the demographics have changed here  
10 recently. But it's like kind of right at the line of  
11 Richardson and Dallas.

12

Q. Now looking at CD32 for the area in the middle of the  
13 district that is between 635 and I-30, can you describe for the  
14 Court any areas where there are concentrations of Black  
15 residents in this portion of CD32?

16

A. Again, I think it's definitely fewer than the previous map.  
17 You obviously have Black families that live in this area, but I  
18 wouldn't characterize it as, per se, concentrations. It's hard  
19 to see what this is on the left side of the body of water  
20 there, what those say. I can't read, make out, what those say.

21

MS. COHAN: May I approach, Your Honor?

22

JUDGE GUADERRAMA: Yes, ma'am.

23

MS. COHAN: Thank you.

24

THE WITNESS: Thank you.

25

A. And so... Is that Junius Heights? Yes. So those areas I

14:37 1 wouldn't characterize as having concentrated areas of African  
2 American, or Black, people.

3 Q. And now looking at the last portion of CD32 that is below  
4 30 that goes all the way to the far right corner of the  
5 district, can you identify for the Court any areas where there  
6 are concentrations of Black residents in that portion of CD32?

7 A. Yes. Pleasant Grove area, where I circled where I live.  
8 And I think a smaller concentration in, like, the Bar Springs  
9 area.

10 Q. Now Ms. Young, how do the concentrations of Black  
11 communities that you just described for CD32 in the 2021  
12 Congressional Plan compare to the concentrations of Black  
13 residents in CD30 -- in CD30 when you were under the 2013  
14 Congressional Plan?

15 A. Yes. Under 32, definitely less of a concentration of Black  
16 people. My neighborhood was -- or my community and area was  
17 moved out of the district with the higher concentration, so not  
18 as many in the District 32.

19 Q. And again, that's -- to be clear, that's compared to CD30  
20 in the previous map?

21 A. Absolutely. Compared to CD30.

22 Q. Now I want to put another set of maps in front of you.

23 MS. NWACHUKWU: And this is Texas NAACP Exhibit 221  
24 that we have circulated to the State.

25 Q. (BY MS. NWACHUKWU) Ms. Young, looking at the image on the

14:40 1 screen, can you identify for the Court what this is?

2 A. Yes. U.S. Congressional Districts Proposed Plan, and it's  
3 identified as Plan C2333.

4 Q. And for the record, I want to represent to you that this is  
5 the most recent, 2025, Congressional Plan that was just enacted  
6 in August.

7 And now I want to show you another image from C2333.

8 And can you identify for the Court what this image is?

9 A. Yes. This is the same plan identified as C2333 U.S.  
10 Congressional District, with the blown-up portion that is  
11 Dallas County.

12 Q. Are you familiar with the area that's reflected on the  
13 screen?

14 A. Yes.

15 Q. And how are you familiar with it?

16 A. I have lived throughout the area, worked throughout the  
17 area, and dined and shopped and visited friends and family  
18 throughout the area.

19 Q. And based on the image in front of you, what Congressional  
20 District did you live in -- or, excuse me, do you live in under  
21 Plan C2333?

22 A. Yep. I am in the butterfly-looking district of 33.

23 Q. Now I want to show you one more image from Exhibit 221.

24 And I would represent to you that this is the same CD33 that  
25 you just identified that's been overlaid onto Google Maps.

14:42 1 A. Okay.

2 Q. Ms. Young, are you familiar with all of the areas that are  
3 shaded in yellow in this image?

4 A. Yes.

5 Q. How are you familiar with this area?

6 A. I live on the southeastern portion of the area and, again,  
7 have worked throughout this area and visited with friends and  
8 family throughout the area.

9 Q. And again, for this map, can you circle where you live on  
10 this map?

11 A. Yes.

12 THE WITNESS: Thank you.

13 Q. (BY MS. NWACHUKWU) Now Ms. Young, looking at the area that  
14 you circled in red, can you describe for the Court the area  
15 that you live in under the current Congressional Plan?

16 A. Yes. Still at the same location, intersection of Prairie  
17 Creek and Military Parkway. Urban setting, predominantly Black  
18 and Hispanic neighborhoods.

19 Q. Now looking at CD33, are you aware of any concentrations of  
20 Black residents that are in this district?

21 A. Yes. Again, not as many, but, yes, as my 30 district,  
22 but...

23 Q. So let's walk through this image in segments.

24 So starting from the middle of the map, do you see  
25 where it says "Dallas" in the center of the document?

14:44 1

A. Yes.

2

Q. So looking at where it says "Dallas" in the middle, going all the way to the northwest of the district, near Farmers Branch, are you aware of any concentrations of Black residents in this portion of CD33?

6

A. Again, Black people live there, but I would say the area of concentration would be right below 35, where, like, Canada Drive -- that West Dallas area. In the Love Field area, there's another historic community, Elm Thicket, that was historically Black, but not the high concentration there now like it used to be with some, yeah, displacement. But those would be the areas, I would say, for the west.

13

Q. Now looking at where -- where the image says "Dallas," going to the southwestern corner of CD33, are you aware of any concentrations of Black residents in this portion of the district?

17

A. Again, Black people I know live there, but I wouldn't characterize, generally, that area as high -- high concentrations.

20

Q. Now looking again at the middle of the image where it says "Dallas," going all the way to the northeast portion of the district, are you aware of any concentrations of Black residents in this portion of CD33?

24

A. Could you give me some cross-references? Oh.

25

Q. So looking at the screen, this area here (indicating).

14:46 1 A. Oh, I thought that was the area we were just talking about.  
2 I apologize. So, no, that area I wouldn't characterize as high  
3 concentrations.

4 Q. And finally looking at the last portion of the district,  
5 extending from where it says "Dallas" in this image all the way  
6 to the southeastern corner of the district, are you aware of  
7 any concentrations of Black residents in this portion of CD33?

8 A. Yes. The Pleasant Grove area, which is where I live. Some  
9 in the Kleberg/Rylie area, which is a little rural. And then  
10 some in that Bar Springs area.

11 Q. Now Ms. Young, how do the concentrations of Black residents  
12 in CD33 that you just described for the Court compare with the  
13 concentrations of Black residents that you discussed earlier in  
14 CD32, in the 2021 Congressional Map?

15 A. Definitely much less -- and I want to clarify. I think I  
16 misunderstood earlier. There is a concentration in the Grand  
17 Prairie area. And I didn't -- I thought we were talking about  
18 a different area, but in that lower, I guess, southwest  
19 quadrant there is a population in Grand Prairie. But overall,  
20 speaking in this map, definitely not a high concentration  
21 overall of -- in comparison to.

22 Q. And now again looking at the concentrations of Black  
23 residents that you just described for CD33, how does that  
24 compare with the concentrations of Black residents that you  
25 just described for CD30 in the 2013 Congressional Map?

14:47 1 A. Way less from CD30. I would expect a drastic difference  
2 between 33 and CD30.

3 Q. Now, we've looked at a number of Congressional Maps today,  
4 and based on the maps that you've testified about for the  
5 Court, how many Congressional Districts have you been in since  
6 you moved to your current residence in 2019?

7 A. It's sad to say, but I have been moved, with the passage of  
8 the 2025 map, it will have been three different Congressional  
9 Districts and different representatives to learn and figure out  
10 what the communities are.

11 Q. And just for the record, are you saying that you have been  
12 in three Congressional Districts within the last six years,  
13 since 2019?

14 A. That would be correct.

15 Q. Thank you, Ms. Young.

16 MS. NWACHUKWU: I have no further questions at this  
17 time and pass the witness.

18 MR. NOTZON: Robert Notzon for the Intervenors.

19 **DIRECT EXAMINATION**

20 **BY MR. NOTZON:**

21 Q. Hello, Ms. Young. How are you?

22 A. I'm a little nervous, but I'm good.

23 Q. I don't know if we've met before. I'm the Legal Redress  
24 Committee Chairman for the State NAACP.

25 A. No, we have not.

14:49 1 Q. And we haven't talked before, have we?

2 A. We have not.

3 Q. Okay. And it's good to meet another life member.

4 A. All right.

5 Q. I have just a short question. Are you familiar with  
6 Jasmine Crockett and the fact that she was representing CD30  
7 and lived in CD30 before the new maps?

8 A. Yes, I am.

9 Q. Okay. And are you aware of whether or not she was drawn  
10 out of the new 30 and where she was drawn into?

11 A. Yes. It's my understanding she was drawn out of 30 into  
12 the new 33.

13 Q. Okay. Thank you very much.

14 JUDGE GUADERRAMA: Any other Plaintiffs?

15 MR. QUESADA: No questions here, Your Honor.

16 JUDGE GUADERRAMA: All right. State? Mr. Loomis?

17 MR. LOOMIS: Thank you, Your Honor. May it please the  
18 Court.

19 JUDGE GUADERRAMA: Yes, sir.

20 **CROSS-EXAMINATION**

21 **BY MR. LOOMIS:**

22 Q. And Ms. Young, my name is Steve Loomis. I'm with the Texas  
23 Attorney General's Office. Can you hear me?

24 A. Yes, sir. Can you hear me?

25 Q. I tend to back away from these microphones, so if I start

14:50 1 getting faint, just motion me forward?

2 A. Yes, sir.

3 Q. At the very beginning it was mentioned that you are an  
4 NAACP member. Is that correct?

5 A. That's correct.

6 Q. It also said that you're a registered voter in the State of  
7 Texas and County of Dallas. You're a registered Democrat.  
8 Right?

9 A. I'm a registered voter, yes, sir.

10 Q. As a Democrat?

11 A. Yes, sir.

12 Q. Okay. You spoke about being a prior Dallas County --  
13 Dallas -- I'm gonna start this over.

14 Dallas City Councilwoman from '25 to 2017 -- 2015 to  
15 2017, wasn't it?

16 A. That's correct.

17 Q. And then in 2017 you lost an election?

18 A. That's correct.

19 Q. And that person, I think, did not run again in 2019, and  
20 there was a nine-person race?

21 A. What person? The -- could you clarify?

22 Q. Sure. You lost an election in 2017 to Kevin Fielder,  
23 correct?

24 A. Kevin Fielder, correct.

25 Q. And then he didn't run again in 2019 for that place, right?

14:51 1 A. My recollection is that he did run again.  
2 Q. Well, I was shown that there was a field of nine candidates  
3 and he wasn't listed. And you broke into the top two but lost  
4 in the runoff to Adam Bazaldua.  
5 A. Adam Bazaldua, that's correct.  
6 Q. And he's currently there for District 7. Is that right?  
7 A. That's right.  
8 Q. Then in 2019 you started TAY Strategies?  
9 A. I did.  
10 Q. And you're currently the CEO?  
11 A. I am SheEO, yes.  
12 Q. And you currently hold a number of other positions with, I  
13 guess, what you could call either charities or public interest  
14 places, or with the County or the State? You have other hats  
15 you're wearing just besides CEO of --  
16 A. Yes, correct.  
17 Q. You list for your company you do things like media  
18 relations and political campaign management, right?  
19 A. Correct.  
20 Q. How many political campaigns has you or your company  
21 handled since 2019?  
22 A. None.  
23 Q. Oh. It also cites you're the Social Chair of Delta Sigma  
24 Theta Sorority, Inc., right?  
25 A. Not as -- I'm the Social Action Chair. So we do have

14:53 1 something called Social Chair, but I'm the Social Action Chair.  
2 Yes, at Delta Sigma Theta Sorority, Incorporated, yes.  
3 Q. I apologize. You had stated earlier that that company does  
4 things like community service?  
5 A. It's not a company. It's an organization. And yes, we do  
6 community service.  
7 Q. Okay. Well, the "Inc." at the end fooled me.  
8 A. Yes.  
9 Q. So I apologize. And one of those big community service  
10 projects a couple of years ago during the election was a  
11 national get-out-the-vote campaign entitled, quote, all  
12 capitals, STOP TRUMP, unquote, correct?  
13 A. I can't speak for the sorority, sir.  
14 Q. You are aware that that was one of the actions that were  
15 taken nationwide, right?  
16 A. I can't speak for the sorority. I'm not familiar with the  
17 event that you're speaking of.  
18 Q. There was nothing like that in Dallas?  
19 A. I'm not familiar with the event that you're speaking of.  
20 Q. Okay. In the past, in CD30, your Representative would have  
21 been Ms. Crockett, correct? Ms. Jasmine Crockett?  
22 A. In the -- no, sir. So the lines were drawn. She was not  
23 my representative. Eddie Bernice Johnson was my CD30  
24 Representative.  
25 Q. Okay. And then in CD32 it would have been -- and that's a

14:54 1 Democrat, right?

2 A. It would have been who?

3 Q. In CD30, that's -- Ms. Johnson was a Democrat?

4 A. Correct.

5 Q. You moved to CD32, or you were moved to CD32, and that was  
6 Mr. Allred, correct?

7 A. That's correct. I was drawn into 32.

8 Q. Also a Democrat, right?

9 A. Correct.

10 Q. And now in CD33, in the future, it would be Julie Johnson  
11 and/or Jasmine Crockett, both Democrats, right?

12 A. I'm not sure who would run in that district. It would be a  
13 brand-new district, so I can't speak to anyone's intentions to  
14 know who would run.

15 Q. Well, you know the incumbent for CD33 right now is Julie  
16 Johnson.

17 A. Um --

18 Q. You're not familiar with that?

19 A. I know she's my current representative.

20 Q. Okay. Are there any major policy position differences  
21 between any of those candidates we've talked about?

22 A. Could you clarify exactly which candidates?

23 Q. Well, between Ms. Crockett, Mr. Allred, and Ms. Johnson,  
24 all Democrats, do they have any major policy differences that  
25 you're aware of?

14:55 1 A. I'm not versed on all of their policy positions to be able  
2 to make a statement if they have major differences between the  
3 three of them.

4 MR. LOOMIS: I'll pass the witness.

5 Q. (BY MR. LOOMIS) Thank you very much, ma'am.

6 JUDGE GUADERRAMA: Thank you.

7 JUDGE SMITH: Just one thing I'm going to interrupt to  
8 say, Mr. Loomis. You asked Ms. Young whether she's a  
9 registered Democrat, but in Texas we don't register by party.  
10 So she -- when you kind of talked her into finally saying, yes,  
11 she's a registered Democrat, but I don't want -- I don't want  
12 to have her showing up as saying she's a registered Democrat,  
13 because there is no such thing.

14 THE WITNESS: And I --

15 MR. LOOMIS: I don't mean to mislead anyone. I  
16 registered when I was 18, and I didn't even remember that fact.  
17 I apologize.

18 THE WITNESS: Thank you, sir.

19 MR. LOOMIS: And I'm very sorry, sir.

20 THE WITNESS: Yes. That's why I said I was a  
21 registered voter. Thank you.

22 JUDGE SMITH: That's what you said, you're a  
23 registered voter.

24 THE WITNESS: Yes, sir. Thank you.

25 MR. LOOMIS: I apologize. That was not my intention.

14:56 1 JUDGE GUADERRAMA: Thank you, Mr. Loomis.  
2 Ms. Nwachukwu?  
3 MS. NWACHUKWU: No redirect, Your Honor.  
4 JUDGE GUADERRAMA: Mr. Notzon?  
5 MR. NOTZON: No, Your Honor.  
6 JUDGE GUADERRAMA: May this witness be permanently  
7 excused?  
8 MS. NWACHUKWU: Yes, Your Honor.  
9 MR. LOOMIS: Yes, Your Honor.  
10 JUDGE GUADERRAMA: You're excused, free to go, ma'am.  
11 THE WITNESS: Thank you.  
12 (Witness excused.)  
13 JUDGE GUADERRAMA: Who's your next witness?  
14 MR. McCAFFITY: Your Honor, the Mexican American  
15 Legislative Caucus calls Chair Romero.  
16 (Witness present.)  
17 JUDGE GUADERRAMA: Good afternoon, sir. Raise your  
18 right hand to receive the oath.  
19 (Witness sworn.)  
20 JUDGE GUADERRAMA: Have a seat, please. If you'd do  
21 us the huge favor of rolling in towards the microphone, and if  
22 you get real close to it your voice will get louder.  
23 THE WITNESS: All right. Testing, testing.  
24 JUDGE GUADERRAMA: It doesn't get that much louder,  
25 but a little bit.

14:57 1

All right.

2

**REPRESENTATIVE RAMON ROMERO, JR.**

3

duly sworn by the Court, was examined and testified as follows:

4

**DIRECT EXAMINATION**

5

**BY MR. McCAFFITY:**

6

Q. Good afternoon, Chair Romero. Can you go ahead and tell

7

the Court your name again?

8

A. Ramon Romero, Jr.

9

Q. All right. And what do you do for a living?

10

A. I build swimming pools and sell natural stone.

11

Q. And what do you do for fun on the side?

12

A. I play golf.

13

Q. Okay. You know what I'm talking about. What do you do for

14

fun on the side in Austin?

15

A. I'm a part-time legislator.

16

Q. Who do you represent?

17

A. I represent District 90 in Fort Worth, Texas.

18

Q. How long have you represented District 90?

19

A. This is my sixth term.

20

Q. And, excuse me. Do you hold any positions in the

21

Legislature besides being just a representative?

22

A. I currently serve as chair of the Mexican American

23

Legislative Caucus.

24

Q. All right. And we went over this in the previous trial, as

25

well as yesterday with Mr. Moody, so I'm not gonna ask you

14:58 1 these series of questions, but I'll just ask you, generally, do  
2 you believe that this type of litigation advocacy is germane to  
3 MALC's mission?

4 A. I do.

5 Q. And you are aware that MALC is a Plaintiff in this case  
6 challenging the current Congressional District Map that was  
7 just drawn in the Special Session?

8 A. I'm aware.

9 Q. As a Chairman of MALC and a member of MALC, are there  
10 individual members that are directly affected by the 2025  
11 Congressional Redistricting maps?

12 A. Members of the Texas House?

13 Q. And specifically of the Mexican American Legislative  
14 Caucus?

15 A. Yes, I do.

16 Q. Are there members, individual members, of the Mexican  
17 American Legislative Caucus that reside in Congressional  
18 Districts that were changed in Harris County?

19 A. Very much so.

20 Q. Are there individual members of the Mexican American  
21 Legislative Caucus that reside in Congressional Districts  
22 changed in Dallas County?

23 A. Yes.

24 Q. Fair to say, throughout the state, there were various  
25 districts that were changed, where members of MALC lived?

14:59 1 A. The -- in order to be a member of the Mexican American  
2 Legislative Caucus, you will have to serve -- your district  
3 will have to be at least 50 percent Latino or you have to be a  
4 member of Latino decent.

5 Currently we have 42 members in the Mexican American  
6 Legislative Caucus, both Democrats and Republicans. We have  
7 one Asian member, one Anglo member, two African American  
8 members. And given the maps, effects on people both Black and  
9 Brown, that would be very easy to surmise that our members all  
10 around the state have been affected by these maps.

11 Q. All right.

12 MR. McCAFFITY: Chad, can you pull up Brooks 253?

13 Q. (BY MR. McCAFFITY) I'm gonna tell you Brooks 253 is the  
14 July 7th letter that the Department of Justice sent Texas.  
15 You're familiar with this letter?

16 A. I am.

17 Q. Have you reviewed this letter -- did you review this letter  
18 during the course of the regulation session?

19 A. We worked through it in meetings with the caucus, yes.

20 Q. All right. And do you see in that -- I guess it's the  
21 second paragraph -- no, sorry, the first paragraph -- there are  
22 four districts that are targeted?

23 A. 9, 18, 29 and 33.

24 Q. Okay. Are there MALC members that individually live and  
25 reside in what was CD9?

15:01 1 A. Yes.

2 Q. All right. And same for -- true for each of those other  
3 three, 18, 29, and 33?

4 A. Yes.

5 Q. Okay. And were those Congressional Districts actually  
6 substantively changed in your view as a result of the  
7 redistricting legislation?

8 A. Very much so, especially in my -- where I currently -- I  
9 was represented by -- represented by Marc Veasey in  
10 District 33, and his district is completely gone.

11 Q. Okay.

12 MR. McCAFFITY: Chad, can you show the overlay of 2193  
13 for me?

14 Q. (BY MR. McCAFFITY) I'm gonna show you just a screenshot to  
15 make it a little easier for you and the Court to orient you.  
16 The old Congressional Map that was passed in 2021 in Harris  
17 County overlaid with -- that's --

18 A. That's Dallas-Fort Worth.

19 Q. That's Dallas-Fort Worth.

20 MR. McCAFFITY: Sorry, Chad; I gave them in the wrong  
21 order. It's my fault. Or maybe I didn't even give it to you.

22 MR. DUNN: Which?

23 MR. McCAFFITY: 2193, overlay Houston. There you go.

24 Q. (BY MR. McCAFFITY) With the House Districts overlaid on  
25 it. See that?

15:02 1 A. I see that. Yes, I do.

2 Q. And this is just straight from District Viewer. In fact, I  
3 did it last night.

4 I know I at least don't have, even though I've been  
5 doing this for a little while, every single member of every  
6 single -- memorized with their House District number, or even  
7 the Congressperson memorized with their Congressional District  
8 number. But I'm gonna ask you a couple of questions.

9 Who, to your knowledge, resides in Congressional  
10 District 29 and represents House District 140?

11 A. I know that to be Sylvia Garcia's district. And 140 is  
12 MALC's general counsel, Armando Walle.

13 Q. Okay. And what about House District 143, as it's laid here  
14 over the 2021 map?

15 A. That happens to be our former general counsel Ana  
16 Hernandez.

17 Q. And House District 144?

18 A. I believe 144 is Penny Morales Shaw. Or maybe I'm wrong  
19 about 144. Could be.

20 Q. Mary Perez?

21 A. Mary Ann Perez.

22 Q. All right. And 145?

23 A. Is that Penny Morales Shaw or Christina Morales?

24 Q. All right. All of those individuals that you just named  
25 for those districts, that have a large section of 29 from the

15:04 1 2019 map in their House Districts, are members of MALC,  
 2 correct?

3 A. Correct.

4 Q. All right.

5 MR. McCAFFITY: Can you now show me the overlay for  
 6 the new map over Harris County, Chad, 2333?

7 Q. (BY MR. McCAFFITY) Okay. Now, this shows how -- what  
 8 happened to 29, 18, and the new District 9 in Harris County,  
 9 correct?

10 A. Yes.

11 Q. And can you describe for me -- and if you need Mr. Dunn to  
 12 go back to the other one so you can make the comparison -- but  
 13 can you describe for me in your own words how you viewed the  
 14 change of 29, 18, and 9 from '21 to '25?

15 A. Well, if I can start with Sylvia Garcia's district, Ana  
 16 Hernandez, the longest-serving Latina in the Legislature.  
 17 Sylvia Garcia, one of the first-ever Latinas to ever serve in  
 18 the U.S. House. First Latina to ever serve -- or Latino, male  
 19 or female -- from Harris County.

20 She no longer is represented by someone that she  
 21 previously worked with, that I know they had an amazing  
 22 relationship together, Ana and Sylvia. It's Congresswoman  
 23 Garcia. So it didn't really come back to grab a lot of the  
 24 Latino neighborhoods that are on the western side of Harris, or  
 25 of Houston.

15:05 1           And 18, which was my former colleague Sylvester  
2 Turner, may he rest in peace, also expanded early -- kind of  
3 went and picked up a lot of those areas that were previously  
4 held by Garcia.

5           And then 9 just really -- I think what's typical of  
6 this map -- goes in, grabs a lot of the urban areas, and then  
7 pits them against non-urban, non-dense Black and Brown  
8 community, bringing in Liberty County. Especially given that  
9 that's Congressman Green's district, a real disservice, I  
10 think, to Harris County that have been incredibly represented.

11 Q. Now, in the new 29, the MALC members that are in the new  
12 29, the last the majority of those districts, based on this  
13 overlay, appear to be Representative Walle on 140, Penny  
14 Morales Shaw on 148, and Christina Morales in 145. Is that  
15 consistent with your understanding?

16 A. Yes.

17 Q. And then the new Congressional District 9 has Ana Hernandez  
18 in 143 and Mary Perez in 144, primarily, right?

19 A. Correct.

20 Q. Does this new map configuration, in your view, make it  
21 potentially more or less difficult to work collaboratively with  
22 their federal counterparts in Congress to solve Hispanic  
23 American interests?

24 A. I think, given -- I think it's going to be much more  
25 difficult.

15:07 1

Q. Why is that?

2 A. Because they've had the relationships for a very long time.  
 3 I mean, Sylvia Garcia was the first ever, as I just explained.  
 4 And having her understanding in the Texas Legislature and in  
 5 the Texas Senate, that was someone that all of us, if we went  
 6 to DC, we visited with. And I can't imagine, if I visited with  
 7 her from Dallas, how much more intense and collaborative  
 8 that -- those efforts were from the Harris County delegation.

9 Q. Okay. What do you say to the criticism, or the talking  
 10 point, that, "Well, they're still in a Hispanic majority  
 11 district, so they're just gonna be able to elect those same  
 12 people again"?

13 A. I think those of us that have ran in those  
 14 barely-50-percent districts understand those are not winnable  
 15 districts. If -- you can be 50 percent population, but if your  
 16 voter registration isn't there, your Spanish Surname Voter  
 17 Registration isn't there, it's still a very tall hill to climb.

18 And I think that Congresswoman Garcia, if she's not  
 19 reelected, again, it's gonna be a disservice to all of Harris  
 20 County. All of the young women that believe they can be  
 21 Congresswomen, especially. There's so many people, as you can  
 22 say on the bench, Ana Hernandez being one of them. Others,  
 23 like Christina Morales, as well.

24 But I think that, unless you're Hispanic -- Hispanic  
 25 like myself, first generation, it's kind of hard to understand

15:08 1 a lot of the difficulties that we go through. And so it's  
2 gonna be a real tall climb. But she needs to win that seat  
3 somehow.

4 Q. Okay. Let's use your friend and colleague in the House,  
5 Armando Walle, as an example here, since we have this map up in  
6 front of us. He lived in the old CD29, and he still lives in  
7 the new CD29, correct?

8 A. Correct.

9 Q. And based on the configuration of the new map, a large  
10 chunk of House District 140 is also still in Congressional  
11 District 29?

12 A. Correct.

13 MR. McCAFFITY: Can you pull up Brooks 258 for me,  
14 Chad?

15 Q. (BY MR. McCAFFITY) Now, Brooks 258, this is in evidence  
16 and this is the --

17 (Sotto voce discussion off the record.)

18 Q. The Citizen Voting-Age Population data from the ACS survey  
19 in 2023 for Plan 2193, which is the 2021 map, okay? And I want  
20 you to focus on Congressional District 29.

21 MR. McCAFFITY: And if you can blow that up, Chad?

22 Q. (BY MR. McCAFFITY) Can you tell me, based on this, what  
23 your understanding of what the Hispanic Citizen Voting-Age  
24 Population was?

25 A. That's 63 and a half percent.

15:10 1 MR. McCAFFITY: Okay. And Chad, can you pull up  
2 Brooks 265?

3 Q. (BY MR. McCAFFITY) It's gonna be the same question. I'm  
4 gonna ask you to look at 29. This plan is -- report is the  
5 same report, but for the new map that just passed in 2025. And  
6 what is the Hispanic Citizen Voting Age Population for the new  
7 Congressional District 29?

8 A. It's now 43.3 percent.

9 Q. And how much of a decrease is that?

10 A. Approximately 20 percent.

11 Q. Okay.

12 MR. McCAFFITY: Would you pull up Brooks 262 for me,  
13 Chad?

14 Q. (BY MR. McCAFFITY) Brooks 262, which you'll see on the  
15 screen in a second, is a TLC report for the 2024 election for  
16 Congressional District 29. And if you look on the first page  
17 there, there are a number of columns. Do you see that?

18 A. Yes.

19 Q. There's Total Voter Registration, SSVR, and then there's  
20 two columns for turnout, right?

21 A. Yes.

22 Q. And what is your understanding of what "SSVR" indicates?

23 A. Spanish Surname Voter Registration.

24 Q. And do you have an understanding of what Spanish Surname  
25 Voter Registration is?

15:12 1

A. Yes.

2

Q. Can you explain that in your term -- in your understanding?

3

A. That means they're not only Hispanic or Latino population, but they're also registered to vote.

4

Q. All right. And for the map in 2021, Plan C2193, what was the Spanish Surname Voter Registration for Congressional

5

District 29?

6

A. It was 56 percent, which is about 156,000 people of the 770,000 people that reside in House District 29. So that would be what we would call your total universe of Spanish Surname Voter Registration.

7

Q. Okay.

8

MR. McCAFFITY: And Chad, if you can bring up Brooks 268?

9

Q. (BY MR. McCAFFITY) And Brooks 268 is the same report, TLC report, that was passed in 2025, Plan C2333. Same general date.

10

A. Right.

11

Q. And what does it show that the Spanish surname voter registration was for Congressional District 29?

12

A. Only 36.2 percent.

13

Q. Okay. Now, based on the 20.2-percent reduction Hispanic CVAP from the old Congressional District to the new

14

Congressional District 29, and the 20.4-percent drop in Spanish Surname Voter Registration from the old Congressional District

15:13 1 29 to the new Congressional District 29, do you think  
2 Representative Walle's gonna be able to elect a candidate of  
3 his choice?

4 A. I think he's gonna have a hard time getting enough people  
5 to be a part of that universe, to be -- to create enough of a  
6 turnout to elect a candidate if he wanted to elect another  
7 Latino, for sure.

8 Q. You think that that kind of drawing and changing of the  
9 Hispanic Sur -- CVAP and Spanish Surname Voter Registration  
10 numbers was an intentional effort?

11 A. I do.

12 Q. And why do you believe it was an intentional effort?

13 A. Folks were already electing the candidate of their choice,  
14 and they were happy with that person. Only thing that changed  
15 was lowering that number. So when you look and you say, "Well,  
16 these numbers are still fairly close, but the Spanish Surname  
17 Voter Registration goes down," you can tell that's intent.

18 Q. All right. Let's use Representative Ana Hernandez as  
19 another example of a MALC member that potentially is affected  
20 here. She represents House District 143, correct?

21 A. Correct.

22 Q. And originally, House District 143, in her -- where she  
23 lived was in the eastern side of Congressional District 29,  
24 eastern side of Harris, Houston, right?

25 A. Correct.

15:15 1 Q. And also contained a sliver of CD18, I think, right?

2 A. Yes.

3 Q. Under the new configuration, based on the maps, the  
4 displays, overlays, we looked at before, almost all of her  
5 district is, if not entirely all of her district, is in the new  
6 Congressional District 9, correct?

7 A. Correct.

8 Q. All right.

9 MR. McCAFFITY: Chad, can you go back to Brooks 258?

10 Q. (BY MR. McCAFFITY) And this is -- again, this is the  
11 Plan 2193, the CVAP report by TLC of the ACS survey data for  
12 the Congressional Districts. And we didn't talk about 18  
13 because with 29 we only talked about 29, so I just want to make  
14 the record clear, since part of HD 143 is in CD18.

15 The CD18's Hispanic Citizen Voting Age population was  
16 what?

17 A. 30.4.

18 Q. Okay. And we already talked about the 29 was 63.5 percent,  
19 right?

20 A. Correct.

21 Q. All right.

22 MR. McCAFFITY: Chad, can you go back to Brooks 265?

23 Q. (BY MR. McCAFFITY) And on this one, the CD18, Hispanic  
24 CVAP number is what?

25 A. 23.7.

15:16 1 Q. Okay. So in old CD18, roughly 30 percent Hispanic CVAP,  
2 and a -- goes down to 23.7?

3 A. Correct.

4 Q. I'm sorry; I said that wrong.

5 Changes to -- well, it did go down. Goes to  
6 27.7 percent?

7 A. Yeah.

8 Q. Okay.

9 MR. McCAFFITY: Chad, can you bring up 262? I'm  
10 sorry, Chad; I gave you the wrong number. 265.

11 Q. (BY MR. McCAFFITY) Now we've already looked at the Spanish  
12 Surname numbers for CD29.

13 In the new Congressional District 9, what is the  
14 Hispanic CVAP number?

15 A. 50.3.

16 Q. Okay. And you were present on the floor during the House  
17 debate of this bill in the end of August?

18 A. I was.

19 Q. And was this one of the districts that Chairman Hunter was  
20 touting as a new majority Hispanic district?

21 A. Yes.

22 Q. Do you have an opinion, based on your observation, of how  
23 the redistricting process went and these numbers, as to whether  
24 or not this is an actual Hispanic majority district?

25 A. Well, I think, when you still look at the numbers of

15:18 1 overall population to the point that I made earlier, population  
2 versus registered voters, so when I'm looking at running or  
3 supporting someone, asking them if they can win, I'm always  
4 gonna ask about the total numbers of folks that are actually  
5 registered.

6 So when I look at that, the follow-up is, "What's the  
7 SSVR?" So I still think 50.3 percent, just in general, as  
8 someone that won in a seat that was almost 70 percent Latino  
9 before I became the first Latino in Tarrant County, I know the  
10 number needs to be much higher than 50 percent if we're just  
11 looking at CVAP.

12 Q. Okay. And, I mean, comparing it, Ana Hernandez's district,  
13 which was largely in Congressional District 29 with a  
14 63.5-percent Hispanic CVAP, even though it's barely above  
15 50 percent, it's still a dramatic drop, right?

16 A. Correct.

17 MR. McCAFFITY: Can you go to 268, Chad?

18 Q. (BY MR. McCAFFITY) And this is -- again, this Brooks 268,  
19 is the TLC reports for the 2024 election analysis for the new  
20 map. And what is the Spanish Surname Voter Registration in the  
21 new Congressional District 9?

22 A. SSVR is 43.7.

23 Q. Again, substantially lower than what it was originally in  
24 the old Congressional District 29, right?

25 A. Much lower.

15:19 1 Q. You were present on the House floor when -- you, yourself,  
2 gave a speech, and a number of members gave a speech on the  
3 House floor, correct?

4 A. Yes.

5 Q. Opposing this bill?

6 A. Yes.

7 Q. And Representative Ana Hernandez was one of those?

8 A. Yes.

9 Q. All right. I'm gonna show you a clip of her speech on the  
10 floor. This is Exhibit 316, from pages 238, line 2 to 240,  
11 line 21.

12 I'm gonna ask you another question while he gets that  
13 ready.

14 Based on the statistics that we just looked at, the  
15 reductions in Hispanic CVAP to a bare majority in the new CD9  
16 and the reduction of Spanish Surname Voter Registration, do you  
17 believe that Representative Ana Hernandez is likely to be able  
18 to elect her candidate of choice in the new Congressional  
19 District 9?

20 A. I think it's gonna be very difficult.

21 Q. And do you have an understanding or an explanation, in your  
22 mind, as to what is -- why it's going to be more difficult even  
23 though it's technically a majority Hispanic CVAP district?

24 A. I think when you think of, you know, some of the problems  
25 that have existed in racially polarized voting, those are

15:21 1 things that are obstacles that are really hard to overcome.

2           Sadly, sometimes people just don't turn out even  
3 though they're registered. We have a low turnout. We're  
4 barely -- Latinos are barely somewhere around 50 percent in  
5 most cases. And that's a reality and that makes it really --  
6 increases the need for a higher turnout, a higher percentage of  
7 Latinos, to make them viable districts.

8           And I think that when they're lower, to this extent,  
9 we know that that's gonna end up being less representatives in  
10 Congress.

11 Q. Okay.

12           MR. DUNN: Which page number?

13           MR. McCAFFITY: Page number 238, line 2 to 240,  
14 line 21, of 316, the August 20th.

15           (Video played.)

16           REPRESENTATIVE HERNANDEZ: And yet HB4 silences that  
17 diversity instead of celebrating it. Under this map, Latino  
18 communities in Harris County have been split apart and  
19 scattered across multiple districts, silencing their voice and  
20 diluting their ability to elect their candidate of choice.

21           Nowhere is this clearer than Congressional District  
22 29. For decades, CD29 has stood as a performing Latino  
23 majority district, a community of interest where Hispanic  
24 voters could elect their candidate of choice.

25           But this map dismantles that district. Latino

15:23 1 neighborhoods like Denver Harbor, Magnolia Park, Second Ward,  
2 Manchester, and Northside, historic centers of Latino political  
3 strength, have been carved out.

4 The Hispanic Citizen Voting Age population has been  
5 reduced almost 20 points, from roughly 63 percent to just  
6 43 percent. That kind of drastic change does not -- has  
7 nothing to do with population shifts or routine adjustments.  
8 It is a clear effort to weaken Latino influence in Harris  
9 County.

10 Under this proposed map, my home, and almost my entire  
11 legislative district, which is over 70 percent Hispanic, is  
12 taken out of CD29 and placed in CD9. HB redraws CD9 in a way  
13 that claims to create a Latino majority district on paper --  
14 50.15 percent -- but in reality dilutes the voting power of  
15 communities of interest in inner city Houston by stretching the  
16 district across unrelated suburban and even rural areas, this  
17 map undermines Latino representation.

18 It makes little sense to connect inner city Houston  
19 all the way to Liberty County, 50 miles away. These areas do  
20 not share the same priorities, challenges, or way of life.  
21 Inner city Houston is one of the most diverse, dense, urban  
22 centers in America.

23 Demographically, the contrast is stark. Houston's  
24 East End is majority Latino, home to historic Hispanic  
25 neighborhoods with large immigrant communities and several

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15:24 1 Catholic churches over 100 years old, that were established for  
2 the growing Mexican American community.

3 Combining Houston's historic Hispanic neighborhoods  
4 like Denver Harbor, Second Ward, Magnolia Park, and the cities  
5 of Galena Park and Jacinto City, which are less than a mile  
6 apart, with Liberty County, a White county 50 miles away,  
7 denies Latino voters a meaningful chance to elect their  
8 candidate of choice.

9 This is not what a functioning democracy looks like.  
10 This is not what Texas expects of us. We should be expanding  
11 opportunities for representation, not dismantling them.

12 Harris County's Latino population growth is so  
13 significant that the county should have gained a second Latino  
14 Opportunity District. Instead, this map cracks Latino voters  
15 apart, dismantles CD29, and distorts CD9, all to weaken the  
16 communities of color that are the backbone of our economy and  
17 our democracy.

18 Members, HB4 is not about fair representation. It is  
19 about silencing voices, silencing the voices of Latino voters,  
20 my family, my friends, my neighbors. It is thus stripping away  
21 opportunity districts that were hard won and protected under  
22 the Voting Rights Act. This is not only wrong. It is  
23 unconstitutional.

24 I urge you to reject HB4. Protect the rights of every  
25 Texan to have their voice heard. Protect the communities who

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15:26 1 built Harris County and keep it strong. And protect the  
2 integrity of our democracy, which demands fair maps and equal  
3 representation for all.

4 Thank you.

5 (Video concluded.)

6 Q. (BY MR. McCAFFITY) Do you agree with her, Chair Romero?

7 A. Absolutely. I mean, I see her pain.

8 Q. Based on your presence at the floor debate at the time, do  
9 you have a recollection of what the reaction to her speech on  
10 the floor was by the Republican leadership?

11 A. It was nonchalant.

12 Q. And do you have a view as to why it was nonchalant, or what  
13 your perception of their reaction was, why that was how they  
14 were acting?

15 A. I think for the most part their decision was made, and the  
16 plea that she just made of demonstrating why, whether it be  
17 someone like Sylvia Garcia or someone like Ana Hernandez that  
18 really knows her community well, is something that legislators  
19 not only devalue, but are willing to intentionally destroy a  
20 district that's been performing and allowing for that  
21 representation, and thus doing a disservice to Texans.

22 Q. Okay. I'm gonna shift gears up to Dallas, where you are,  
23 and use you, basically, as the next example. Okay?

24 MR. McCAFFITY: Chad, can you show the screenshot of  
25 the DFW area for Plan 2193?

15:27 1 Q. (BY MR. McCAFFITY) All right. And again, this is just a  
2 demo slide to help orient you because there's a lot of numbers  
3 on the screen. And the judges.

4 This is Plan C2193, the map passed in 2021 and focused  
5 here on CD33. Do you see that?

6 A. Yes.

7 Q. Okay. And there are MALC members that reside in House  
8 District -- and represent House Districts that are within or  
9 touch Congressional District 33, right?

10 A. Many members.

11 Q. All right. So, for instance, House District 100 is  
12 represented by Vinton Jones. Is he a member of MALC?

13 A. Vinton Jones is a member.

14 Q. House District 102 is represented by Ana Maria Ramos?

15 A. Ana Maria Ramos, I mean, there's Rafael Anchía. There's a  
16 little bit of Terry Meza, I believe. Cas Hernandez as well.

17 Q. Okay. And just so we can put a number, so that -- if the  
18 judges were curious as to where those individuals were as it  
19 relates to CD33, does Representative Anchía represent House  
20 District 103 on the east side of CD33?

21 A. Correct.

22 Q. And does Jessica Gonzalez represent HD 104?

23 A. 104.

24 Q. And Terry Meza represents House District 105, right?

25 A. Correct.

15:29 1 Q. And you represent?

2 A. House District 90.

3 Q. House District 90. And where is House District 90 on this  
4 map?

5 A. It's in the Central core of Fort Worth, Tarrant County,  
6 inside the loop of 820 there.

7 Q. All right. And in what part of Fort Worth do you live in,  
8 you reside in, as a voter?

9 A. I live in Southeast Fort Worth, but really close to  
10 downtown. I'm the first exit outside. So my district is  
11 really core to the Central -- Central Fort Worth.

12 Q. Okay.

13 MR. McCAFFITY: And let's put up the next screenshot  
14 of the new map in 2025, Plan C2333, overlaid with the House  
15 Districts.

16 Q. (BY MR. McCAFFITY) And this is -- the new Congressional  
17 District 33 is in yellow there in Dallas County. Do you see  
18 that?

19 A. I do.

20 Q. And the new portion of CD25 is in gray that reaches up from  
21 south into Tarrant County, right?

22 A. That's correct.

23 Q. And where is House District 90 and where you live now?

24 A. I am now --

25 Q. Is it located?

15:30 1 A. I am now in House District -- I'm sorry, in Congressional  
2 District 25. The vast majority, I'd say two-thirds of  
3 District 90, is now in Congressional District 12, and the  
4 remaining part is in 25.

5 Q. Okay. But you, personally, live in?

6 A. In 25. In 25.

7 Q. All right.

8 MR. McCAFFITY: Chad, can you bring up Brooks  
9 Exhibit 258?

10 Q. (BY MR. McCAFFITY) And if you would look for me, this  
11 is -- again, this is the TLC report of the HCVAP data for  
12 Plan 2193, the 2021 map. And can you tell me what the Hispanic  
13 CVAP number in 2021 was?

14 A. For 33 it's 43.6 percent.

15 Q. Okay. And Brooks --

16 MR. McCAFFITY: Chad, can you go to Brooks 262?

17 Q. (BY MR. McCAFFITY) And again, this is the 2024 Election  
18 Report for Plan C2193 passed in '21. And if you could tell me  
19 what the Spanish Surname Voter Registration was for  
20 Congressional District 33.

21 A. It's 36.5.

22 Q. Now, who is -- was the candidate of choice for the old  
23 Congressional District 33 in your view?

24 A. It's Congressman Marc Veasey.

25 MR. McCAFFITY: And Chad, will you bring up Brooks

15:31 1 Exhibit 265?

2 Q. (BY MR. McCAFFITY) Now, this is the Plan C2333 new map,  
3 2025 map, HCVAP. And for the new Congressional District 25,  
4 where you reside, what is the Hispanic Citizen Voting Age  
5 population?

6 A. 20.1 percent.

7 Q. And that's roughly another 20-percent drop in Hispanic  
8 Citizen Voting Age Population compared to the district you  
9 resided in before, correct?

10 A. That's right.

11 Q. All right.

12 MR. McCAFFITY: And would you go to Brooks 268?

13 Q. (BY MR. McCAFFITY) And the same type of report for 24 for  
14 the new map. What is the Spanish Surname Voter Registration  
15 for Congressional District 25?

16 A. 13.8 Percent.

17 Q. Again, it's about another 20, 23 percent, drop, as compared  
18 to your old Congressional District 33?

19 A. That's correct.

20 Q. And as a Hispanic American voter in the new Congressional  
21 District 25, do you believe you're gonna be able to elect your  
22 candidate of choice?

23 A. Absolutely not.

24 MR. McCAFFITY: Chad, could you put the screen overlay  
25 up of the new map, Plan 2333, and the DFW Metroplex?

15:33 1 Q. (BY MR. McCAFFITY) Can you describe in your own words,  
2 geographically, what Congressional District 25 does?

3 A. Well, where it comes in from southwest and it goes up  
4 through Eastern Fort Worth and Southern Fort Worth, that's  
5 virtually all of the -- not all, but the vast majority of the  
6 African American population in -- in Fort Worth. It's --  
7 Everman, Forest Hills, Southeast Fort Worth, Stop Six, Poly,  
8 Hallmark, South- -- parts of Southwest Fort Worth. And then it  
9 goes up into -- towards Dallas and it picks up all of Irving,  
10 which is a hugely Latino community.

11 So, I mean, when I saw 25, it is pretty clear that the  
12 only reason to go into Tarrant and Dallas County was to pull  
13 Black and Brown voters out. And they've stripped them out of  
14 Tarrant and Dallas Counties, sent them out into Somerville and  
15 Johnson, Hood, but I don't know how far -- how much further, if  
16 that's the edge, the western boundary. It looks like it  
17 pulls -- I don't know that the next county is over.

18 But, you know, I'm in the pool business, so I work in  
19 Somerville and Hood County and those places, and we don't have  
20 a lot in common with those folks down there. There's a lot of  
21 empty land and mobile home parks and farming and ranching. And  
22 those folks don't have a lot to do, or understanding, of what  
23 it's like to represent areas of the historic South side where,  
24 you know, 76104 has the lowest life expectancy of any place in  
25 the State of Texas. And that's an urgent matter for us in

15:35 1 Tarrant County.

2 And I have somebody that now may represent those areas  
3 of Parker County, and, you know, they're -- I doubt they'll  
4 spend the kind of time necessary to serve the constituents that  
5 I represented in Fort Worth.

6 Q. Okay. And you see there the Congressional District 25.  
7 There's a tentacle that goes up into Tarrant County. That's  
8 what you were describing as grabbing the African American and  
9 Hispanic voters?

10 A. If I -- I would imagine, if this had a way to highlight  
11 where the Black community, especially the Black and Brown  
12 community, in this part of Southeast Fort Worth, it would be --  
13 or this part -- where 25 comes in, it would be really dense.

14 Q. Okay. Before we -- we'll get to that -- before we get to  
15 that --

16 MR. McCAFFITY: Chad, if you could go back to the 2021  
17 map view that shows the old CD33?

18 Q. (BY MR. McCAFFITY) Now CD33 has been criticized in the  
19 past -- I think you heard this at the last trial -- as being  
20 not particularly compact because it stretches from Fort Worth  
21 to Dallas in this bridge across the I-30 corridor, right?

22 A. Correct.

23 Q. All right. Now in your view, based on living in the area  
24 and the demographics of the area, which one of the two bridges,  
25 or tentacles, makes more sense to you if you're going to have

15:36 1 one? The one from rural southwest counties, southwest of Fort  
2 Worth, reaching up into urban Tarrant County, or one that  
3 tracks a corridor between Dallas and Fort Worth with common  
4 interests?

5 A. Yeah, I mean I think that I-30's is what's always held --  
6 it the turnpike. It's what's always held Dallas and Fort worth  
7 together. I said it in the last one. This is our  
8 neighborhood. This is our community. DFW region, the DFW  
9 airport, everything that is DFW today. It's always held us  
10 together. It's why we're the fastest part of the country  
11 that's growing.

12 And look, as a Latino, 33 unified us. It brought us  
13 together. It caused us to -- for me to not just do the  
14 chorizo/menudo breakfast in Fort Worth, but always go to the  
15 one in Dallas, because that's where I saw my friends. It's  
16 only -- you know, from my house to Downtown Dallas, it's barely  
17 30 minutes. I imagine if I went from my house to the far  
18 western side of the new 25 it would be two or three hours.

19 So if you're talking about compactness, you can't tell  
20 me that that's more compact when it stretches, you know, over  
21 100 miles, possibly. And this probably barely goes 30 miles  
22 outside of everything that it does for the Latino community.

23 This was a unifying district. And it was -- I --  
24 well, it's -- the new 25 just really, it hurt -- it hurt  
25 Dallas, but it really hurt Tarrant County. I think if someone

15:38 1 like -- I said this earlier. For Ana Hernandez potentially  
 2 being someone that could run for Sylvia Garcia, I can cite  
 3 personally, because I have been united with DFW, if I would  
 4 have ever had a wish to run for Tarrant County, that idea of  
 5 ever serving my community in Congress is very unlikely now at  
 6 this point for myself.

7 Q. Okay. I'm gonna -- you mentioned looking at sort of area  
 8 pockets, or areas of particular racial composition. I'm  
 9 gonna --

10 MR. McCAFFITY: Can you pull up Brooks 418?

11 MR. DUNN: No.

12 MR. McCAFFITY: Okay. Well, then, we won't do that  
 13 right now. How dare you?

14 (Laughter.)

15 Q. (BY MR. McCAFFITY) Were there -- were there any  
 16 discussions in the regular session of the 89th Legislature  
 17 before -- I never say it right -- *sine die* was called, about  
 18 doing any kind of redistricting?

19 A. No.

20 Q. No discussions at all?

21 A. Not that I was made aware of, even as MALC chair. I mean,  
 22 I had plenty of discussions with the speaker from the beginning  
 23 of session as to what the intent was gonna happen, if there was  
 24 anything that was gonna be harmful to MALC or MALC members,  
 25 that I'd want to be made aware of it. Redistricting was never

15:39 1 brought up.

2 Q. Okay. When was, to your recollection, the first time that  
3 you heard that there were going to be new efforts to redistrict  
4 in Texas?

5 A. When the DOJ letter came out. I mean, when it came out it  
6 was pretty obvious that it was -- something was gonna happen.

7 Q. Okay. Had you heard, before the DOJ letter, just general  
8 rumors about Trump wanting to find more seats?

9 A. I can't say that I saw -- or really expected -- I mean, I  
10 never -- I don't know what to believe and what the president  
11 may say that's actually gonna come true. Having just done it  
12 in '21, having just come to this Court and been a part of it, I  
13 didn't see that really being on the horizon. I just thought it  
14 was another -- another one of the things that's said.

15 Q. But then after the DOJ letter was issued to the State,  
16 there was serious discussion about redistricting being taken  
17 up, right?

18 A. Yes. And that's what I mean; at that point I didn't know  
19 what to make of the DOJ letter, but once the DOJ letter came  
20 out, the rumors, that's all anybody talked about really  
21 quickly. "This is gonna happen."

22 We were already under the belief that we were going to  
23 come back for Special Session for either THC -- first we were  
24 gonna come back for some changes to THC ban because of the  
25 disagreement between the Governor and the Lieutenant Governor.

15:41 1 And then it became the floods of Kerr County. Now it's way  
 2 more urgent that we come back for a Special Session for that.

3 And then after the DOJ letter, that's when we -- at  
 4 least when I felt like, "I bet they're gonna take up  
 5 redistricting first, before they take anything else up."

6 Q. And then the Governor called a Special Session and added  
 7 redistricting to the call, correct?

8 A. That's correct.

9 Q. And during the first Special Session there were a number of  
 10 regional hearings on the maps with the public, correct?

11 A. That's correct.

12 Q. And we've gone through a lot of the chronology. I'm not  
 13 gonna repeat that, but there was one particular meeting that  
 14 was at the University of Texas at Arlington, correct?

15 A. That's correct.

16 Q. Did you attend that meeting?

17 A. I did.

18 Q. And how would you describe for the Court what the  
 19 atmosphere of that meeting was like?

20 A. I was -- it started outside. There was many people from  
 21 all over the region. I think folks came from a long way. The  
 22 DFW region, the Metroplex, is huge. And when you -- in Plano  
 23 and Weatherford, Parker County, everybody kind of came together  
 24 for that meeting. Hundreds of people. Overflow. It was  
 25 pretty clear, long before the meeting started, that there was

15:42 1 not gonna be enough room.

2 So it was very busy. And it was passionate. But I  
3 think, more than anything, it was hurtful. It was hurtful  
4 because there was no map presented. And a lot of folks still  
5 believed, like, "Are we going to see a map today? Are we going  
6 to see a map today?" And there was a map up, but it was the  
7 existing -- existing districts, not what they're planning on  
8 doing.

9 So a lot of frustration that, you know, here we are  
10 holding meetings to just talk about generalities of  
11 redistricting, but not what was actually going to happen and no  
12 actual information being shared.

13 Q. Did you make any public remarks at the --

14 A. I did not. There were so many people. And we had already  
15 been talking about other legislators maybe taking up the oxygen  
16 in the room, so more public needed to be heard. So I didn't  
17 want to take up any time, away from the public.

18 Q. And you indicated that there were no maps already present.  
19 Was it a common theme amongst the public commenters that they  
20 wanted to see a map before they had to give their public  
21 comments?

22 A. Oh, absolutely. And even constituents, or people that  
23 called me, "Why are they not showing us what they're going to  
24 do?"

25 Q. And how would you be able to respond to those constituents?

15:43 1 A. "I have no control." I mean, I think that what we heard  
 2 from Chairman -- even on his layout, Chairman Hunter said, "We  
 3 are under no obligation to have meetings at all." And when I  
 4 gave my remarks and questioning from the back mic, that's just  
 5 not Texan. That's not how we do things.

6 We -- a constituent will ask you, "How do I get  
 7 involved?" And you always say, "Go to a public hearing. Go to  
 8 City Council. Go to your Legislature. Go register to  
 9 testify." And people come and do that and they feel completely  
 10 unheard.

11 And that's why I made the comments that I did from the  
 12 back mic, that that's not Texan. That's not the way we do  
 13 things.

14 Q. I mean you're familiar with the Texas Open Meeting Act,  
 15 right?

16 A. Yeah.

17 Q. I mean, we pride ourselves on having transparency in our  
 18 Government so much that we criminalize, sometimes, private  
 19 meetings amongst Government entities, right?

20 A. We rely on transparency. What kind of Government do we  
 21 have if the people are not being served by the Government?  
 22 Shouldn't be done in secret.

23 Q. And that transparency extends to the public; we want to get  
 24 the public the information so that they can inform decisions  
 25 that -- of yourself as a legislator?

15:45 1

A. Correct.

2

Q. And in your view did that happen in any of the regional hearings that Chairman Hunter did you a favor in granting?

3

A. None whatsoever.

4

Q. All right. Eventually there was a point where the

5

6 Redistricting Map was going to come up for a vote in the House during the first Special Session, right?

7

A. Correct.

8

Q. And then there was a quorum break.

9

A. There was.

10

Q. Did you participate in the quorum break?

11

A. I did.

12

13 Q. What, from your perspective, was the intent of the quorum break on behalf of the Democratic legislators that chose to do that?

14

15 A. Retreat. "We don't have to do this." The legislature didn't have to do this. Governor Abbott didn't have to do this. They didn't have to comply. Didn't have to comply with the request. This is the beginning of the end of the democracy as we know it, in my opinion. That's the way I felt about it.

16

17 I've been involved in redistricting on a City Council level, testifying, being a part on -- in my local community, and I know what happens when people feel unheard. They stop participating.

18

19 And that's the last thing that we want, is folks to

15:46 1 not -- to not show up. To not believe that their voice means  
2 anything. And when they're in an area where they can't elect  
3 someone of their choice, then they're gonna stop participating.  
4 And that's not American.

5 So I said, "I'm not here for this. This is not what I  
6 signed up for. I'm not here to take away people's voices. I'm  
7 not here to silence them." So if it means walking away for an  
8 undetermined amount of time, I was willing to do it. And I  
9 did. It's a great sacrifice, whatever -- whatever the -- you  
10 know, whatever it takes, that's what we're gonna do.

11 And I did what I believed we had to do and lead and  
12 beg people from around the country to help out, pay attention,  
13 and, "By golly, you're gonna learn what redistricting means and  
14 how it affects you." And we did that.

15 Q. There was -- I'm not gonna play the clip for you, but we  
16 saw it in this trial already, where Governor Abbott referred to  
17 the Texas Democrats that left to break quorum as chickens  
18 flying away, or running away, and not Texan, because they're  
19 not fighting.

20 What is your response to that kind of comment by the  
21 Governor?

22 A. I can say a lot but, I mean -- he's entitled to say  
23 anything he wants to say. He's the Governor of the State of  
24 Texas. He can make those remarks. Other remarks that were  
25 made were much more dangerous. Some folks know we had bomb

15:47 1 threats when -- at the hotel we were at.

2 Members of our legislative -- members that left  
 3 were -- pizza deliveries were being made to their homes very  
 4 similar to the types of pizza deliveries that happened where  
 5 the legislators were shot in their homes and killed in their  
 6 homes.

7 One legislator said, "This is where they are. This is  
 8 the hotel. Go get 'em." You know, when things like that are  
 9 said, when we have a constitutional right to break quorum  
 10 because somebody with the wisdom understood that a minority  
 11 party has to have some effect, and be valued at all cost, not  
 12 just complete partisanship, then we -- you know, we did what we  
 13 had to do.

14 Q. Did you consider reactive quorum breaking an act of  
 15 political speech?

16 A. Absolutely.

17 Q. Did you consider it a fight?

18 A. It's a part of the fight. It's the second time I've done  
 19 it. Honestly, I'd hoped that I'd never have to do it again.  
 20 I'd hoped that the Legislature learned its lesson. This is an  
 21 embarrassment to the State of Texas. The Governor should  
 22 consider this as a reason to get it done in the 140-day  
 23 session, which -- that's what our forefathers always wanted, a  
 24 citizen-led Legislature where people like me can go back home  
 25 and get to work for the rest of the time outside of the

15:48 1 140 days.

2 Q. How long -- do you have a recollection of how long the  
3 quorum break lasted?

4 A. It was just right at a little over two weeks.

5 Q. All right.

6 A. 15, 16 days.

7 Q. And from your view, did the quorum break cause a delay in  
8 the ultimate passage of the redistricting bill?

9 A. I don't know how long it would have taken. I know Governor  
10 Abbott would have just called another Special Session similar  
11 as he has in the past. I mean, we were here in December. We  
12 were in Austin until December the last session. So I believe  
13 that they would have just called another after another.

14 I don't know how much of an actual delay. There was  
15 some delay. I don't know how much, how many days we actually  
16 delayed the final vote and the signage.

17 Q. But, as far as you recall, the quorum break itself lasted  
18 roughly two weeks, right?

19 A. Correct.

20 Q. And then, when -- the quorum was established almost  
21 immediately upon your return, correct?

22 A. That's right.

23 Q. And was the first piece of legislation passed in the second  
24 Special Session of the redistricting legislation?

25 A. It came before the floods.

15:49 1 Q. Now, there was a -- there were some questions to Speaker  
2 Moody yesterday about the political nature of this, and that  
3 this is -- well, I'm just gonna read you the quote from the  
4 deposition -- or from his floor speech that they read to Chair  
5 Moody.

6 That Chair Moody said on the floor that, "It's the  
7 kind of thing we run for office to do, not this." Talking  
8 about Kerrville. "This is politics over people in the grossest  
9 way possible. It's a power grab, and I feel sick in my soul  
10 that we have stooped this low."

11 Do you agree with that statement?

12 A. I think he started talking about other situations similar  
13 to where we are now, that we had families that were --

14 JUDGE SMITH: All he asked you was whether you agree  
15 with that statement.

16 A. I agree.

17 MR. McCAFFITY: Sustained.

18 Q. (BY MR. McCAFFITY) And do you have a view as to whether or  
19 not the manner and method with which the Texas Legislature  
20 engaged in redistricting in the Second Special Session was a  
21 gross form of politics?

22 A. I do.

23 Q. And you also said on the House floor -- you used the word  
24 "gross," correct?

25 A. I did.

15:51 1 Q. And when you were talking about the grossness of the  
2 politics, it was in relation to what?

3 A. My prior statement that I made now, when you -- when people  
4 are no longer engaged in our country, when they no longer  
5 believe that their vote matters, that's not a place that I  
6 think America should ever been in.

7 Q. Okay.

8 MR. McCAFFITY: Chad, can you play the second video  
9 clip from Brooks Exhibit 316? This is pages 309, line 9 to  
10 310, line 6.

11 Got it. If you don't, that's okay. Okay.

12 (Video played.)

13 REPRESENTATIVE ROMERO: This bill is a gross attempt  
14 to make Texans give up, to believe that their vote doesn't  
15 matter because the outcome is predetermined. That's not  
16 democracy. That's dangerous. And in fact you, too, you,  
17 yourself, you're not even free to vote your conscience. You've  
18 been told exactly how to vote today. You've been harassed,  
19 threatened with the future loss of your seat, just as you were  
20 with the voucher scam.

21 This is and should be the land of the free, not the  
22 land of where "you must agree with me." You, too, have an  
23 oppressor. When Donald Trump asked for five more seats, your  
24 decision was made, and it was made at the expense of  
25 communities of color. Their political representation has been

15:53 1 a target of this bill, and you're making that decision in your  
2 mind for political preservation. You made that decision, and  
3 you're making that decision, out of fear. It's a political  
4 calculation.

5 You are not free to be courageous and vote with your  
6 heart. One of the first times I ever --

7 (Video concluded.)

8 Q. (BY MR. McCAFFITY) So when you say -- do you still agree  
9 with your statements?

10 A. I do.

11 Q. When you say that this is a political calculation, do you  
12 mean that this is a map driven by partisanship alone, or do you  
13 mean something else?

14 A. I mean that if they don't ride along with this objective of  
15 passing a racist map, that somebody will come after them.  
16 Their own party will come after them. And they don't care  
17 about what they did to Southeast Fort Worth. They don't care  
18 what they did to take people from Irving all the way out to  
19 West Texas, practically, or, you know, however far that new 25  
20 goes. They don't care about what they're doing in  
21 Congressional District 9 and sending them over and splitting  
22 communities apart.

23 And that's what I mean. It's -- their decision was  
24 made and everything that we said, our pleas, were not -- the  
25 decision wasn't made in their conscience, as I said there. So,

15:55 1 absolutely, I agree.

2 Q. And when they made those decisions, it was a gross  
3 political decision because they were doing it in an  
4 unconstitutional manner, right?

5 MS. THORBURN: Objection, Your Honor, leading.

6 JUDGE GUADERRAMA: Sustained.

7 Q. (BY MR. McCAFFITY) Is part of the basis for why -- what is  
8 part of the basis for why you believe that the act, political  
9 act, was gross, as it relates to the Constitution?

10 A. I think all of us deserve to be represented well. That's  
11 why we've had and we've been fighting for the Voting Rights  
12 Act. That's why we've had protections under the Voting Rights  
13 Act. That's why districts were created for that  
14 representation.

15 And when people are no longer represented, they lose  
16 their right, their constitutional right, to be represented in  
17 the greatest House in the world.

18 Q. You were sitting here in the courtroom as the MALC  
19 Representative when Mr. Kercher played the portion of the  
20 Chairman Hunter layout of the bill, correct?

21 A. Correct.

22 Q. And you heard him talk about the *Rucho* U.S. Supreme Court  
23 decision that says you can use partisanship to redraw lines,  
24 right?

25 A. Right.

15:56 1 Q. Do you have an understanding as to whether or not you can  
2 use race as a means to create a partisan gerrymander?

3 A. I would say no, you should not.

4 Q. Do you think that the way this map was drawn and the result  
5 of the map, now that we see what it looks like, is merely  
6 partisanship, or do you think it's something more invidious?

7 A. I think it's -- it's invidious. It's -- I mean, I think  
8 first, as much as I struggle as a Latino, I think about the  
9 Black community that -- right there in the video,  
10 Representative Collier, who was standing right behind me, very  
11 courageous Black member that represents some of the oldest and  
12 historic Black neighborhoods in Tarrant County.

13 And I think, because they have voted Democrat, as  
14 Senfronia Thompson said earlier, they -- for so long, they can  
15 claim that it's partisan. But they're taking Black folks and  
16 sending them out where they'll never be represented properly.  
17 And I think that's -- that's a scary, in my opinion, racist,  
18 way of hiding behind partisanship.

19 Q. All right. Thank you for your time, Chairman Romero.

20 MR. McCAFFITY: I pass the witness.

21 JUDGE GUADERRAMA: Thank you, Mr. McCaffity.

22 Ms. Thorburn?

23 MS. THORBURN: Ali Thorburn for the State Defendants.

24

25

15:57 1

**CROSS-EXAMINATION**

2 **BY MS. THORBURN:**

3 Q. Can you hear me all right?

4 A. I can hear you fine.

5 Q. Great. Well, good afternoon, Chair Romero.

6 A. Good afternoon.

7 Q. We spoke a few months ago when we were here about the 2021  
8 maps. Isn't that right?

9 A. That's correct.

10 Q. Well, it's good to see you again, and I hope you've been  
11 well, since then.

12 A. Thank you, Ali.

13 Q. Just a few months ago we spoke about your involvement in  
14 the 2021 redistricting process.

15 A. Yes.

16 Q. And you were not a member of the Redistricting Committee  
17 then?

18 A. No.

19 Q. And you weren't a member of the Redistricting Committee  
20 now?

21 A. Correct.

22 Q. And you mentioned in your testimony just a few minutes ago  
23 that you broke quorum twice?

24 A. In '21, and this time as well.

25 Q. And you broke quorum because you believe that the new

15:58 1 Congressional Map is intentionally discriminatory against  
2 Latinos?

3 A. Against Black and Brown.

4 Q. And you believe that, by voting yes for HB4, those people  
5 were trying to take away the American belief in the Democratic  
6 process and put us on a path to dictatorship?

7 A. I didn't say that.

8 MS. THORBURN: Richard, could you please bring up  
9 State Exhibit 1319, page 310?

10 Q. (BY MS. THORBURN) Do you see that on your screen?

11 A. Was this in my -- was this under the deposition?

12 Q. This is from the speech that you gave on August 20th.

13 A. Okay.

14 Q. The August 20th hearing. Do you see where it says, "And by  
15 voting 'yes' today, you're trying to take away that American  
16 belief in the Democratic process, and you put us on a path to  
17 dictatorship"?

18 A. What I was explaining is the same thing I just said a  
19 moment ago.

20 Q. That wasn't my question. My question was, did I read that  
21 correctly?

22 A. You read that correctly.

23 Q. Thank you. And so you did not vote for C2333.

24 A. Correct.

25 Q. But you are the chair of the Mexican American Legislative