

1 someone has been prevented from voting. Let me ask
2 if you are able to name anybody who been
3 substantially burdened in their attempt to register
4 to vote by this law?

5 A I believe that I've responded to that
6 question already, Mr. Bardos.

7 Q Has Subsection 6 diverted any of the
8 resources of your organization in any way either --
9 I understand that you don't have a budget, but has
10 it affected the way you allocate volunteer time, for
11 example?

12 A Oh, definitely, yes.

13 Q Can you explain how that happens?

14 A With this new law the coalition is
15 impacted in term of taking time from the community
16 education program to educate the community about the
17 issues at hand and also it will impact in term of
18 how to use -- the people, how to use the new
19 machine, the voting machine this thing itself.

20 It's a very difficult undertaking,
21 because the people have to change from learning the
22 existing system to the new system. And also we will
23 have to divert -- to divert a staff time from it
24 putting overtime putting a website together in order
25 to educate people about it, that law. And also we

1 anticipate that more people will be attempting to
2 vote, therefore, we may have to get a new telephone
3 line, all lines as a Hot Line, so people that have
4 problems they have a way to get a response.

5 And also that will impact myself,
6 that will take time from myself instead of doing
7 other activities and other issues, I will basically
8 take that time away to address these issues. And
9 besides, that those two people besides myself that
10 provide their time to the coalition, their job is to
11 be impacted, also just a specific organization is
12 going to be impacted as well in term of giving more
13 time to follow up with those issues. And also
14 follow up, this is something that is time intensive
15 that I would have to do and also do in groups that
16 belong to the coalition and will have to do.

17 And there are many other things that
18 I could add in term of how this law is compelling us
19 to divert resources in order to address that
20 specific issue.

21 For instance, on election day instead
22 we have to make a choice on election day whether or
23 not to deploy volunteers to help people who are
24 facing problems at the machines, with the voting
25 machines, which and I take that is -- also I state

1 something good that it providing feedback in Creole,
2 at least we are hoping that the community may face
3 less problems with optical scan machines, but the
4 fact that provide feedback that is a positive step;
5 but again, we will have to educate, we will have to
6 take the time to educate the voters on how to use
7 that machine.

8 And we are being placed in a
9 situation where to allocate our limited resources.
10 Should we help or put resources in responding to
11 those people that were rejected under the no match
12 no vote or should we focus our attention to those
13 people that need some help in term of voting
14 properly.

15 Q Has the coalition taken any steps to
16 educate voters specifically about Subsection 6?

17 A In that, we, the coalition, is putting a
18 campaign on that matter, but I believe that on HAVA,
19 the fact that HAVA deals with issue of minority
20 language access, I believe also it should be part of
21 the responsibility of the state to have been --
22 inform those communities like ours facing language
23 issues or barriers to assist in that effort to help,
24 but I believe that that is part of HAVA that should
25 be also a concern or the state.

1 Q Let me ask specifically about the
2 Subsection 6 the matching statute. Has the
3 coalition taken any steps to educate voters or
4 members about Subsection 6 the matching statute?

5 A Not at this time.

6 Q Does it have any plans to do so?

7 A Oh, definitely.

8 Q Was that plan ever discussed among the
9 executive committee members?

10 A The plan to inform the community about the
11 no match no vote?

12 Q About that statute, yes.

13 A Your question, if I understand it, has the
14 coalition discussed plans to educate the community
15 about the no match no vote?

16 Q Correct.

17 A At this time, no, but that doesn't mean it
18 doesn't plan to. The fact that the community is
19 going to be significantly impacted we have the
20 responsibility to inform the community. In fact,
21 there's an election coming in January in Florida, so
22 some of the voters would have to have -- needing to
23 know what kind of difficulties that you will be
24 facing with.

25 Q So would it be correct to say that the

1 coalition does not presently have any definite plans
2 to educate voters about the matching statute, but
3 you expect that it will?

4 MS. PEREZ: Objection to form.

5 BY MR. BARDOS:

6 Q Can you answer, please?

7 MS. PEREZ: If you understand the question
8 you can answer it.

9 THE WITNESS: Can you reframe the
10 question, it's not clear. I'm not clear with
11 that question.

12 BY MR. BARDOS:

13 Q Does the coalition have any definite plans
14 at the present time to educate voters about
15 Subsection 6, the matching statute?

16 A You said as of today do we have a plan or
17 are we to have a plan?

18 Q As of today do you have a plan?

19 A As of today we do not have a plan, but
20 that doesn't mean that we will not have a plan as we
21 are getting closer and closer to the election
22 period.

23 Q Do you have a copy of the responses which
24 the coalition gave to the secretary;
25 interrogatories?

1 MS. PEREZ: He does right in front of him
2 now.

3 (Brief recess.)

4 THE WITNESS: Mr. Bardos, there is
5 something I wanted to add in terms of how this
6 law impacts the coalition. Is that okay with
7 you?

8 BY MR. BARDOS:

9 Q Yes, please do.

10 A This law also hurts our mission. The
11 mission of the coalition is to present presentations
12 to and also to empower the Haitian American
13 community. This law basically presents a barrier in
14 terms of the ability of a community to show its
15 voting strength because at this time what we have in
16 Miami-Dade is a -- under the current system Haitian
17 Americans are registered as Black, Black means of
18 African-American and our efforts for fair
19 representation, voting strength of Haitian Americans
20 is not being shown for the present time in term of
21 fair representation for our community. This is
22 aspect number 1.

23 Aspect number 2, one of the biggest
24 needs of the Haitian American community is to
25 have -- to have the ability to elect the candidate

1 of choice. That is going to seriously impact us in
2 doing that. Not only that, in the coalition and
3 Haitian community in term of a community agenda, in
4 term of allocating resources to community needs,
5 this the law also will impact the coalition in term
6 of addressing poverty issues.

7 If you look at census data whether it
8 is 2000 or in 1999, you will see the worst poverty
9 indicators all of them fall within the area code,
10 falls within the Haitian community in Miami-Dade.

11 So, for instance, in 2006 there was a
12 Haitian American candidate who was challenging an
13 African American incumbent, the Haitian candidate
14 lost by 200 something votes. So therefore, unless
15 that Haitian American voters have the ability to
16 register to vote, those needed community changes
17 they will take much longer to occur in order to
18 address the needs of our community.

19 BY MR. BARDOS:

20 Q Did you have a copy of the responses to
21 the interrogatories with you?

22 A Yes, I do have a copy with me right here.

23 Q Let's turn, please, to the response to
24 interrogatory number 3. And let me ask first of
25 all, have you seen these responses before?

1 A Yes, I have.

2 Q Were you reviewed them?

3 A Yes, I did.

4 Q Let's look at the second paragraph of the
5 response to interrogatory number 3 and the second
6 sentence says, comparable attempts to verify
7 particular information on registration forms have
8 resulted in errors 15 to 30 percent of the time.

9 Could you please expand on that or
10 let me know where that data comes from?

11 A This is an averaging of data that was
12 collected in other jurisdictions, but my
13 understanding is in the State of Florida there was
14 over 30,000 rejection of people was no match, people
15 attempting to vote or people attempting to have the
16 voter registration valid, but there's a failure of
17 these are not them, these are based on the cards.

18 Q So 15 to 30 percent, does that number come
19 from -- is there a report or a book or what is the
20 source of that number?

21 A I do not recall the specific source of
22 that number, but as to published reports I can
23 always issue that to you later, but this is an
24 average. I think what should be of importance is
25 the large number of 30,000 rejections based on the

1 State of Florida's record that at least 30,000
2 people were rejected this term of no match no vote.

3 Q So you don't though, you don't recall at
4 the present time where the 15 to 30 percent number
5 came from?

6 A I know it is from other jurisdictions.

7 Q Let's start, let's also take a look at
8 response interrogatory number 6, please.

9 You've already discussed this in some
10 detail already, let me ask you about the second
11 paragraph and the second sentence that says in past
12 elections the HAGC monitored precincts in the
13 Haitian American community on election day and
14 assisted voter of language access or other voting
15 related issues.

16 How will the matching statute affect
17 your ability to monitor precincts in the Haitian
18 American community and assist voters of language
19 access?

20 A Can you rephrase the question? I do not
21 understand it.

22 Q Do you see the second sentence in the
23 second paragraph?

24 A Hold on, please. Okay. And what is the
25 question?

1 Q It says that the HAGC monitored precincts
2 in the Haitian American community on election day
3 and they assisted voters with language access or
4 other voting related issues.

5 A Yes.

6 Q Will the Subsection 6 affect the coalition
7 ability to monitor precincts on election day and
8 assist voter with language access?

9 A I believe I answered this question
10 already.

11 Q Can you explain how it will have an
12 effect?

13 A On election day the coalition will face
14 that, two choices. It will face the choices of
15 either helping focusing on people that were already,
16 I would say who have in place the voter registration
17 card or what they have to do is go to the precinct
18 and then vote. If they have problems with those new
19 machines that will be used, if they have issues we
20 will be there to assist them.

21 Now, in addition to that, we will
22 have also -- we will have to divert resources to
23 address that specific in term of a no match no vote.
24 Those people, we are aware that they are likely to
25 be issued, if provisional ballots, if they show up

1 at the polls because those people you've got to
2 understand, they are in a state of limbo, those
3 people that no match no vote. On election day if
4 they do not know whether or not they should go to
5 the precincts if they go depending on -- it's like a
6 Russian roulette depending on knowledge of the
7 election officials in those precincts they can get
8 proper advice or they cannot get advice at all in
9 term of they have no match no vote, they may be
10 issued a provisional ballot or they may not be
11 issued one.

12 Let's say they are issued a
13 provisional ballot, then the -- let's say that they
14 decide to use it, should they decide to use that
15 ballot they must take the additional steps in term
16 of going to the Miami-Dade election canvassing board
17 in order for the vote for that ballot to really
18 count.

19 Within our community what you don't
20 understand is that a lot of people they are first
21 time voters and do not even know about the existence
22 of an election canvassing board. It is the
23 sophisticated voter, I believe, that -- who knows
24 how to navigate into that spiral, into that universe
25 of elections of how to get your ballot to be counted

1 because in our community once you vote and you vote
2 you vote, you don't have -- they believe, they would
3 believe the system would take care of that. This is
4 for that reason the community needs an institution
5 like the American Haitian Grassroots Coalition to
6 look after its interest because many of those
7 people, as I told you before, as I stated before,
8 they are first time voters and providing them with
9 provisional ballot it is like a joke because their
10 vote is like -- is highly likely will not be counted
11 as part of that process.

12 And it is kind of disenfranchisement
13 and we feel that's wrong, it is exclusionary and it
14 is discriminating at the same time. So this is the
15 kind of -- that kind of balance that kind of choice,
16 that law is pushing -- the community is being put in
17 a corner because we are facing so many barriers
18 already in term of ability to promote change to vote
19 because those people that have become citizens they
20 believe in their right in that what you call, in
21 that idea and there's not idealism of democracy.
22 For them democracy is not an illusion, they are
23 hoping that the system would provide them as much as
24 reliability or reliance that if they are willing to
25 make that -- if they are willing to step to the

1 precinct the expectation is that vote should be
2 counted, no more no less.

3 All we are asking is for a playing
4 field with other groups. And where that would put
5 the Latin community, where that would put the
6 Haitian community, it really puts us at a big
7 disadvantage in term of competing, in term of having
8 a fair playing field to compete with other groups.

9 Q If we look at the first sentence of the
10 second paragraph it says, Subsection 6 will force
11 HAGC to divert its resources to Haitian American
12 voters whose application has not been processed as a
13 result of Subsection 6.

14 Did it have that effect in 2006
15 before or at the time of general elections?

16 A A few people because it is the first here
17 that law was being implemented, many I would say
18 that several advocates and also the Haitian
19 community in general was not purview as well as some
20 of the candidates, they are not purview of that law.
21 But now we are focusing, in fact, I'm learning more
22 and more as a result of my research in term of that
23 law.

24 So I would say that the fact that
25 Haitian American candidate in the 2006 election and

1 the fact this -- some of them lose by a few number
2 of votes, I believe that that law has highly likely
3 impacted the community.

4 Q So is it your testimony that in 2006 at
5 the time of that election, you were not familiar
6 with Subsection 6 in such a way that it would have
7 diverted the coalition's resources?

8 A That is accurate.

9 Q When did you become familiar with
10 Subsection 6?

11 A I became familiar with it in 2006, in late
12 2006.

13 Q Do you know approximately when, do you
14 know the month?

15 A Oh, no. I would not be able to give you a
16 specific month, no. I would say that -- I would say
17 that it was after -- it was after the presidential
18 election. I believe I don't think it would --

19 Q It was after the general election?

20 A That's correct, yes.

21 Q I'm sorry, I didn't hear the answer.

22 A I said late 2006, yes.

23 Q When the coalition monitors precincts are
24 those members of the coalition who volunteer to
25 monitor the precincts?

1 A That is correct. Yes, I would say.

2 Q How would a member go about signing up to
3 mentor a precinct?

4 A They would go -- they would go signing up.
5 First of all, the person has to take the commitment
6 for election day that he or she is willing to
7 monitor the precincts and also monitoring some as
8 well as the -- of what you call it -- those days
9 where you have elections prior to election as well.

10 Q And so is it the coalition that initiates
11 this by posting something on the list serve or by
12 some other communication with the members?

13 MS. PEREZ: Objection, form.

14 BY MR. BARDOS:

15 Q Who initiates the volunteers monitoring of
16 the precincts?

17 A Who initiates.

18 Q Yes, is it the coalition?

19 A The coalition, I would say that the
20 coalition initiated that process, too, along with
21 the those organizations that conduct voter
22 registration within the coalition.

23 Q Is by means of the list serve, is that how
24 you communicate with the volunteers regarding --

25 A That would be one way, that would be one

1 of the ways.

2 Q Have there been any elections in south
3 Florida, say Miami-Dade and Broward counties --
4 well, let me ask first of all, in which counties
5 does the coalition primarily operate?

6 A Miami-Dade county.

7 Q Primarily Dade. Have there been any
8 election in Miami-Dade county since the 2006 general
9 election?

10 A I'm not aware of any elections after the
11 2006.

12 Q There have been no local elections,
13 municipal elections, county election?

14 A Not to my knowledge.

15 Q Has the coalition made any efforts outside
16 of this litigation to resolve its dispute with
17 Subsection 6?

18 A Can you reframe that question?

19 Q Yes. Has the coalition taken any steps,
20 before the litigation began to let its concerns
21 about Subsection 6 be known to state or local
22 officials?

23 A Not directly.

24 Q Has it done so indirectly?

25 A I know that in the Haitian American

1 Grassroots Coalition they have had two meetings with
2 local officials here. So I'm not sure if that issue
3 was brought to the local election officials here.

4 Q So you didn't attend those meetings?

5 A No, I did not.

6 Q Have you ever done any work for the
7 Advancement Project?

8 A Meaning?

9 Q Have you ever volunteered for them or been
10 a consultant for them or been an employee or
11 contractor for them?

12 A Advancement Project, we have -- we have
13 had in term of election, yes. The past, we have
14 done things of 2000, 2004 on some, as part of the --
15 yeah.

16 As part of the -- as part of the,
17 2000 election fiasco in Florida or South Florida we
18 noticed that our community, the Haitian American
19 voters were significantly disenfranchised. We had
20 the -- sought help from many quarters and the
21 Advancement Project was one of them. We did seek
22 help from the US Commission on Civil Rights. We did
23 seek help from the NAACP. We did seek from the
24 Advancement Project and some organizations we
25 approached trying to attempting to seek some kind of

1 assistance because we were deeply impacted in 2000.

2 Q I have only a few more questions.

3 On your list serve has the coalition
4 ever posted anything about Subsection 6 or the
5 matching statute?

6 A What is the question again?

7 Q Has the coalition ever posted anything on
8 the list serve about this matching statute?

9 A I'm not sure, but I believe that it may
10 have -- we may have the -- I'm not very sure, but I
11 believe in August when the -- at the meeting where
12 the coalition took action to challenge that law, I
13 believe that in the meeting notice that it is
14 possible that that was placed.

15 Q So you might have posted something about
16 this lawsuit being filed, is that what you were
17 saying?

18 MS. PEREZ: Objection,
19 mischaracterization. You can answer the
20 question if you understand it.

21 THE WITNESS: What is the question?

22 BY MR. BARDOS:

23 Q I was just trying to understand what your
24 answer was to my previous question. Were you saying
25 that you might have posted something about this

1 lawsuit being filed?

2 A I did not say that.

3 Q Then I must have misunderstood. Can you
4 please explain again what you think might have been
5 posted recently on the list serve about the matching
6 statute?

7 A I would say that in some time in August
8 when the coalition met on that, usually our meetings
9 are posted in the list serve, and I believe that --
10 I'm not sure, I'm not sure whether or not that the
11 issue was placed as an alleged item in the list
12 serve for the August meeting.

13 Q Are your members able to post that on the
14 list service as well?

15 A Of course, yes.

16 Q Have any of your members posted anything
17 on the list serve about this Subsection 6?

18 A Not to my recollection.

19 Q Has the coalition been involved in
20 litigation before this lawsuit?

21 A Not to my knowledge.

22 Q As we sit here today, are there any more
23 election laws or election regulations in Florida
24 besides Subsection 6 that you feel my substantially
25 burden your member's right to vote?

1 MS. PEREZ: Objection, relevance.

2 You can answer the question if you
3 understand it.

4 THE WITNESS: Mr. Bardos, are you
5 familiar -- I don't know if I can if you put it
6 that way. I do not know if you're familiar
7 with the 100 feet law.

8 BY MS. PEREZ:

9 Q Yes, I am.

10 A Okay. I don't know if you are aware that
11 law was basically implemented because of some
12 incident that occurred in one of the Haitian
13 precincts in 2004 election. Before that law used to
14 be 50 feet and it was due to an incident which was
15 in our community whereby that the public imperatives
16 they challenge the volunteers of the Haitian
17 American Coalition in term of assisting the Haitian
18 American voters with language access.

19 And this law, we don't like this and
20 I think it is also that law should go back to the
21 prior distance to 50 feet.

22 And other issues that we have with
23 the state is language accessibility. Even though
24 that within the system the optical scan system they
25 provided language feedback, but without resources to

1 educate the community about the language
2 accessibility that would be of limited help to the
3 community.

4 The other issues, that other issue
5 that we have is the ability of voters to be able to
6 include their ethnicity on their voter registration
7 card. Because at this time, as I explained before,
8 we have no gauge in term of providing a true count
9 of Haitian American voters which are in Miami-Dade
10 county, and for that matter we can -- the whole
11 state of Florida because most counties do not
12 provide that ability for voters to include their
13 ethnicity on the voter card.

14 MR. BARDOS: Let me see if I have any
15 other questions.

16 That's all.

17 (A brief recess was taken.)

18 C R O S S E X A M I N A T I O N

19 BY MS. PEREZ:

20 Q I just have a few to just make sure the
21 record is a little bit clear.

22 Has there been any sort of voter
23 registration activity posed on the list serve?

24 A Oh, yes, plenty of voter education
25 activities. Yes, definitely.

1 Q What is the nature of these posts?

2 A The nature of those post is to basically
3 empower the community in term of the significance
4 for the members to be -- to participate in the
5 election process very activity.

6 The fact that -- the fact that we
7 have a community that speaks another language and
8 the fact that the elections -- is a new participant
9 in the democratic election, is a new experience, and
10 also the election itself, the election in the US and
11 Florida it is a universe of its own.

12 So, therefore, the forum is a way
13 like a community billboard where the people can
14 interchange information, other members can exchange
15 information and also to know what is going on in the
16 community for instance.

17 If, for instance, when groups like
18 NAACP, when groups, one of the groups are doing
19 voter registration complaints we think this is
20 information that the Haitian American community
21 should use in order to register to vote and also to
22 know the issues at hand.

23 For instance, one of the big problems
24 that the community has is ordinances that's been
25 being put in their language, they are not translated

1 in Creole. It also gives, as you want to make sure
2 those Haitian residents want to make sure that their
3 constituents and can have their vote count.

4 If somebody -- I don't think if
5 some -- but the community feels that your vote, a
6 vote should be counted, no more, no less. If
7 somebody wants to vote then should not be no
8 barrier, as long as the person fills the
9 requirements that vote should be counted. So again,
10 many postings took place in that forum and that
11 advocacy forum related to elections.

12 Q You also testified that you had
13 coalitional meetings on a monthly and as an as
14 needed basis. Do you anticipate that closer to the
15 elections that you are going to have more
16 coalitional meetings on the subject of how to
17 address no match no vote.

18 A Oh, yes definitely.

19 Q Is that going to take time away from some
20 of the other activities that you would otherwise do?

21 A Oh, yes, yes. We will have to spend
22 untold hours in Haitian TV and radio to inform the
23 community about that law and definitely that will
24 divert resources that we could address or for
25 alternate issues related to Haitian empowerment and

1 community education on voter education.

2 Q And you testified about how this would
3 frustrate your mission. You talked -- you told a
4 little bit about a story, it's not a story, a fact
5 of a Haitian American candidate who lost by 267
6 votes. Do you think this law is also going to
7 frustrate your mission by preventing your leaders
8 from getting elected?

9 A Oh, yes, definitely. As I said two
10 candidates. One instead of two, yes. They were not
11 elected by some 200 votes and that law is preventing
12 Haitian American voters their ability to vote is
13 going to have a serious impact for a Haitian
14 American community to elect candidates of choice.

15 Q Do you expect to get more members as you
16 get closer to the election?

17 A Oh, yes definitely, yes. We do because
18 there are the difficulties and the challenges being
19 faced by our community is such that the community,
20 that members of the coalition member organization
21 and Haitian American community in general, there is
22 strong anticipation that people will be going
23 heavily at the polls in order to elect. So we can
24 elect officers in the state, federal and local
25 elections, but the community has learned for the

1 past ten years since the coalition has been created,
2 when we have friends in high places the job gets
3 done, better policies are implemented, better --
4 there's a better way to access to resources than
5 other times.

6 Q Is the coalition or any of your member
7 groups doing work in advance of the voter
8 registration in advance of the presidential primary?

9 A Yes, definitely, yes. We do have -- we
10 have a schedule of official activities being
11 conducted by one member of the organization from
12 about two or three weeks. There would be voter
13 registration activities being conducted along with
14 the Health Fair and we do expect that, as we are
15 approaching the January elections, other members
16 will be conducting more -- will be conducting
17 aggressively voter registration campaigns in order
18 to get more people on the roles.

19 Q I believe that was my last question. I
20 just want to clarify, have you personally ever been
21 employed with the Advancement Project?

22 A No, no, no, no, not at all.

23 MS. PEREZ: I'm good.

24 R E - D I R E C T E X A M I N A T I O N

25

1 BY MR. BARDOS:

2 Q I have just a few questions. Regarding
3 the coalitional meetings that you had, has
4 Subsection 6 been discussed at any of your past
5 coalitional meetings?

6 A Also I said in August, when August the
7 coalition took action in term of challenging that
8 law, so there's section Subsection 6, yes, it was
9 discussed.

10 Q Let me just clarify, these are meetings in
11 person these are not list serve or internet
12 meetings?

13 A Those are meetings of the executive
14 committee of the coalition.

15 Q They meet in person?

16 A That's correct.

17 Q I'm sorry, I didn't hear the answer.

18 A I said yes.

19 Q So you say that Subsection 6 was discussed
20 at that meeting in August?

21 A Yes.

22 Q And it was discussed at any meeting prior
23 to that?

24 A No.

25 Q Can you tell me generally speaking what

1 the discussion was in the August meeting?

2 A In the August meeting I brought the issue
3 as an item and explained to the membership the way
4 that law is implemented. It has serious
5 consequences on our mission. It has serious
6 consequences on our agenda in term of their ability
7 of the Haitian Coalition and member organization and
8 the consequential in general to participate fairly
9 in registering all the people to vote.

10 Q Was that decision made in that meeting or
11 was this only a discussion on Subsection 6?

12 A Decision was made at that meeting.

13 Q What was that decision?

14 A That the coalition should challenge that
15 law.

16 Q Do members who are not on the executive
17 committee attend those meetings?

18 A Yes.

19 Q Have any of the members prior to the
20 August meeting mentioned Subsection 6 at any of
21 these meetings?

22 A Not to my recollection.

23 Q When is your next meeting scheduled to
24 take place?

25 A That would be, in fact, that would be next

1 week, a Tuesday or Wednesday. We do have some
2 crises in the Haitian community.

3 There's a crisis with the AIDS
4 situation, we have a crises in Haiti where we have
5 that hurricane Noel hitting, making damage in Haiti.
6 And also we have Haitian youngsters who are killed
7 by a law enforcement agency in the county and those
8 are crisis that the coalition has pending, so we
9 will be having that special meeting next week.

10 Q Is there an agenda for that meeting?

11 A Not at this time as we talk.

12 Q Is there an agenda for any future meeting,
13 an agenda that's already prepared for any future
14 meetings?

15 A I have already respond to that question,
16 Mr. Bardos.

17 Q My previous question referred to next
18 week's meeting. I'm now asking about any future
19 meetings.

20 A I already responded to that question.

21 Q Myrna asked you about voter registration
22 activities in anticipation of the presidential
23 primary election. Is the coalition organizing and
24 conducting those activities or -- let's just say, is
25 the coalition organizing those activities?

1 A As I said, Mr. Bardos, I believe I
2 responded to that question.

3 MS. PEREZ: You can answer again.

4 THE WITNESS: If that helps I will answer
5 again based on --

6 BY MR. BARDOS:

7 Q If you can answer again that would be
8 helpful.

9 A As I said in the beginning of this
10 deposition, the coalition itself do not engage
11 directly in voter registration activities, but
12 member groups that belong to the organization do.

13 MR. BARDOS: I have no more questions.

14 (Thereupon, the deposition was
15 concluded at 11:35 a.m.)

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STIPULATION

It is hereby stipulated by and between counsel for the respective parties and the witness that the reading and signing of the foregoing deposition are hereby waived.

AND FURTHER DEPONENT SAITH NOT.

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THE STATE OF FLORIDA
COUNTY OF MIAMI-DADE.

I, the undersigned authority, certify that
ROBERT JEAN LAFORTUNE personally appeared before me
and was duly sworn.

WITNESS my hand and official
seal this 11th day of November,
2007.

MELANIE STINSON-KONSTANTINIDIS
COURT REPORTER
Notary Public - State of Florida
My Commission Expires: 5/07/09
My Commission No.: DD 431519

C E R T I F I C A T E

THE STATE OF FLORIDA
COUNTY OF MIAMI-DADE.

I, MELANIE STINSON-KONSTANTINIDIS, Court Reporter, State of Florida at Large, do hereby certify that the aforementioned witness was by me first duly sworn to testify the whole truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages, numbered from 1 to 56, inclusive, are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand this 11th day of November, 2007.

MELANIE STINSON-KONSTANTINIDIS
COURT REPORTER
Notary Public - State of Florida
My Commission Expires: 5/22/09
My Commission No.: DD 431519

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