Exhibit F:
Sergio DeLeon
Plan C185.

Q  Okay. And you mentioned "chatter." So is that something that this statement is based on? things that you heard --

A  Sure.

Q  -- from other people?

A  Yes.

Q  So you don't have any personal knowledge that the work on Plan C185 was done behind closed doors in secret?

A  That's correct.

Q  Okay. All right. Let's go to page 4. Okay.

First full paragraph, the second sentence.

Are you there?

A  Uh-huh.

Q  Is it says, "The carving and dividing of minority neighborhoods in Tarrant County particularly constitutes a stark and brutal attack on Hispanic and African-American voters and their communities."

Did I read that accurately?

A  That's correct.

Q  What do you mean when you say that minority neighborhoods were carved and divided in Tarrant County?

A  Well, when you look at the Plan C185, it looks like parts of Fort Worth, minority neighborhoods, is in
one district, and then parts of another are in another
district. And so that, to me, constitutes carving up
minority neighborhoods and putting them in two different
congressional districts so a minority could not have an
opportunity to be elected.

Q  Okay. If you'll turn -- on Exhibit 4, the
maps, if you'll turn to the last page, there's a blowup
of Tarrant County. And so it's got the districts
shaded, but then it's also got the streets on there. Do
you see that?

A  Uh-huh.

Q  It's very -- the print's very small.

A  Uh-huh.

Q  Can you -- based on looking at this Tarrant
County map, can you identify the minority neighborhoods
that were carved and divided by Plan C185?

A  Uh-huh. I can look and see that part of --
what area is that? In 33, in parts of that -- in the
Arlington area, I know that there's a growing Hispanic
population in Arlington along with Asian.

Q  Okay.

A  And then along -- and even along the Altamesa
Boulevard, there's significant growing African-American
population in this part along Altamesa Boulevard.

Q  Down south of --
A Yeah.
Q -- 20 and --
A Yeah.
Q -- west of 35?
A Uh-huh.
Q Okay.
A And so those are two neighborhoods that are out. Now, a lot of the traditional Hispanic areas are in 12. That, I understand. But it looks like obviously two segments of the population were clearly left out in -- or placed in 33 and not all together as one whole.
Q When you say the two areas taken out, that's the --
A I mean 12 and the 33. Yes.
Q Is that the area in Arlington?
A Yes.
Q And then down around Altamesa?
A Uh-huh.
Q Is there a name for the neighborhood down around Altamesa, or the area?
A You know, I'm not from that side of town, but I've driven it a number of times and have been through some of those neighborhoods, but I don't know the name of it.
Q Okay. And in Arlington, can you kind of
describe on the map for me -- you mention that there was
a growing Hispanic population and --

A Uh-huh.

Q -- the growing Asian population in Arlington.

A Uh-huh.

Q Can you identify on the map where that population's located?

A I know around Arkansas Lane. I think it's Highway 380. I know that's a lot of Hispanic growth over there, and I base that upon a lot of the taquerias that are -- are springing up along that area.

And then the -- I'm not an expert on the city of Arlington, but I do know that there's an Asian community over there, and it's kind of like -- I want to say it's blended in with the same area where the Hispanics are, around Mayfield Road.

Q Okay.

A And they were very significant in a commissioner election there in Tarrant County Commissioner No. 2.

Q Okay. This isn't on the map, but you mentioned the commissioner districts.

Do you know kind of what commissioner districts are in Arlington and where the boundaries are?

A No. I couldn't tell you.
Q  Okay. So let's see. So we've got -- there's a Hispanic area in the city of Arlington, an Asian area in the city of Arlington, and then the growing African-American area --

A  Sure. South --

Q  -- down around Altamesa in kind of southwest Fort Worth.

A  Uh-huh.

Q  Are there any other --

A  Uh-uh.

Q  -- neighborhoods that you can see that were kind of divided by Cl85 in Tarrant County?

A  No.

Q  And so I take it that -- so you've mentioned some black and Asian growth?

A  Oh, wait a minute.

Q  Oh, of course.

A  I'm sorry. I'm sorry.

Q  No, that's all right.

A  This Denton County, the 26.

Q  Right.

A  Okay. So you have north side Fort Worth and south side Fort Worth that are lumped in with a population group over in Denton County. Now, to me, those are two separate groups, not truly one community
of interest. People in Denton County think differently and operate differently from people in north and south side Fort Worth.

Then you have the remainder which falls in Congressional District No. 12, which is Granger's. So, you know, I look at this, and it just looks totally gerrymandered because even -- you've got parts of Fort Worth as a whole in two different congressional districts.

Q So, let's see. So you talk about the north side. That --

A That would be --

Q The north side's over kind of west of 35, southeast of 820 along --

A Sure.

Q Where's Northside Drive and North Main?

A And then --

Q Okay. And then south side, is that kind of down --

A Yeah.

Q -- along Hemphill?

A Correct. And Seminary.

Q And then, are there --

A And then I think almost my neighborhood would be -- under C185, would be in Congressional District
1 like you have some Hispanics and some Asians in the 33.
2 You have a huge Anglo population and a
3 small Hispanic population in 12, a heavier concentration
4 of Hispanic in Congressional District 26, which goes up
5 into Denton County's and which has nothing in common
6 with north or south side 4.
7
8 Q    What do you mean when you say that Denton
9 County has nothing in common with north and south side
10 Fort Worth?
11
12 A    Well, I grew up in south -- in rural areas.
13 And based on my drive-throughs through Denton County,
14 that's a pretty rural area. And don't get me wrong,
15 both country folk and Hispanic folks are good people,
16 but there are just obviously varied differences in their
17 approaches in certain things.
18
19 And Denton County appear -- has been more
20 conservative versus north and south side Fort Worth, a
21 bit more progressive from a political perspective and --
22 on this -- Plan C185.
23
24 And I would say the same thing is true
25 with Parker County, which is a very rural area, blending
26 in with the Asian population in Arlington and the little
27 Hispanic and African-American population that's in this
28 particular plan.
29
30 Q    And what are the specific issues or areas
where, as far as you're concerned, people in Denton County would take a different approach than people living in Fort Worth?

A Well, I mean, let's just -- let's talk present day. I don't think you see very many people in Denton County talking about comprehensive immigration reform.

Okay?

And the same can be said in Parker County blending in with the rest of CD33 on this Plan C185 because their -- their needs are a lot different, and just -- they're just different communities.

There's nothing wrong with them, but they would much -- I would much rather see them compacted and together voting and supporting a candidate of their choice, because I believe a candidate coming out of there obviously is going to understand their needs and concerns more so than, let's say, somebody out of Parker County.

Q Do you know what the level of the Hispanic population is in Denton County?

A I do not.

Q Have you spent much time in Denton County?

A I used to serve court papers when I was constable in Denton County, and from my drive-through, just visual observation, I mean, it's a pretty
County, if you have an opinion?

A You know, my preference would have been to have one congressional district for all of Tarrant County. But we didn't see that. And short of that, I think the 33rd, as it's drawn now, is as close as we can get to Hispanic -- to communities of interest.

Q The 33rd under the current plan?

A Under the current plan.

Q Congressman Veasey's --

A Correct.

Q -- district?

A Correct. Had the full district -- I don't know what number it would have been, but had it been exclusively in Tarrant County, I may have opted for a different path.

Q So what did you mean -- staying on the same sentence where you say "a stark and brutal attack on Hispanic and African-American voters and their communities"?

A Well, the -- it was obviously drawn for a reason, this Plan C185. And to me, that reason is an attempt not to have minorities voting as one population as a whole, because they are fractured and they are split. It's obvious to the naked eye.

Q Do you know whether or not the legislature was
aware of specific minority communities in Tarrant County when this map was adopted?

A I don't know if every member of the legislature was aware, but I do know that those men and women are smart enough to bring in a whole lot of experts. And I would have hoped that they would have been -- have done their due diligence to bring in an expert to say, "Wait a minute. This area is Hispanic. This area is African-American. This area's Asian. Perhaps we should think about this before we just start drawing lines."

Q And back to your opinion about what the congressional districts should have looked like in Tarrant and Dallas County, is there a particular goal that you think the legislature should have had in configuring these districts?

A Well, the goal should have been to keep communities of interest together and to create minority opportunity districts, because, getting back to how all of it started, was that the growth in population mostly coming from the Hispanic community warranted additional seats in the state of Texas, period.

Q Okay. So is it accurate, then, to say, that in creating a minority opportunity, the legislature should have made sure to include Asian, Hispanic, and