EXHIBIT 7 (part 2)
<table>
<thead>
<tr>
<th>Page 33</th>
<th>Page 35</th>
</tr>
</thead>
<tbody>
<tr>
<td>where you've taken a corrective action with regard to a county manager saying -- saying that increased effort needed to be made to provide voter registration during client interviews?</td>
<td>whether -- is whether anybody takes minutes or there are notes -- whether there's any written -- written documents that -- that show the topics that are discussed during those meetings.</td>
</tr>
<tr>
<td>Q. We talked a bit earlier about GI's. What's your general practice when you receive a GI?</td>
<td>A. Well, I would assume that probably my CDs take notes, because that's what we're discussing. But I don't require them to do that.</td>
</tr>
<tr>
<td>A. I read it.</td>
<td>Q. And within your files or your office's files, you don't have notes of those meetings?</td>
</tr>
<tr>
<td>Q. Uh-huh.</td>
<td>A. Handwritten notes, maybe, yeah.</td>
</tr>
<tr>
<td>A. And then I -- if -- because GI's are distributed to the entire division. So everybody gets -- gets a GI. So with a GI or -- because we get a lot of memos, different types of memos -- I will -- if it takes some action as far as me maybe discussing it with my county managers or county directors, I usually will either call them up and, you know, we'll talk about it. Most cases, they probably will discuss it in their staff meetings.</td>
<td>Q. You may have handwritten notes?</td>
</tr>
<tr>
<td>Q. Are there -- are there occasions where you bring your county managers together to meet with you face-to-face all together?</td>
<td>A. Uh-huh.</td>
</tr>
<tr>
<td>A. Yes. Yes. There is. It's been a little harder with budget constraints. But I do.</td>
<td>MR. KENGE: I'd like to request copies of the -- any handwritten notes in Mr. Delgado's files, to the extent that they refer to voter registration or to discussion of voter registration. I wouldn't want to get copies of everything. But to the extent that they refer to voter registration, we would request those, please.</td>
</tr>
<tr>
<td>Q. Is that done on a regular basis, for example, like a quarterly basis or -- anything --</td>
<td>MR. TERRY: To the extent they're available, I'll make them available.</td>
</tr>
<tr>
<td>you know --</td>
<td>MR. KENGE: Thank you.</td>
</tr>
<tr>
<td>A. Yeah. I try to get them on a quarterly basis. But, like I said with budget constraints, it's a little more difficult. I do try to have on a quarterly basis, conference calls with them.</td>
<td>MR. TERRY: You're welcome.</td>
</tr>
<tr>
<td>Q. But just so that I understand. You try to meet face-to-face --</td>
<td>Q. (By Mr. Kenge) To your recollection, during any of the -- any of the quarterly meetings that you've had with your county directors face to face, has there -- have any of those meetings discussed voter registration?</td>
</tr>
<tr>
<td>A. Uh-huh.</td>
<td>A. We probably have.</td>
</tr>
<tr>
<td>Q. -- quarterly. But you have conference calls if you're not able to meet face-to-face?</td>
<td>Q. And why do you say &quot;probably&quot;?</td>
</tr>
<tr>
<td>A. Right.</td>
<td>A. Because I -- you know, we -- we -- going back to the GI, we've talked about the GI. So I'm going to assume that we probably talked about the GI. We talked about voter -- voter registration.</td>
</tr>
<tr>
<td>Q. Is that correct?</td>
<td>Q. Are there -- are there any occasions during the face-to-face meetings where you reviewed the reports of voter registration from specific offices with the county managers?</td>
</tr>
<tr>
<td>A. Right. Correct.</td>
<td>A. Not to my recollection.</td>
</tr>
<tr>
<td>Q. Are there agendas that are prepared for those meetings?</td>
<td>Q. Okay. What I was asking about there were the face-to-face meetings. Let me ask the same questions about where you've had these types of meetings over the telephone. Do you recall any -- any of those telephone meetings where you discussed reports of voter registration coming from county offices?</td>
</tr>
<tr>
<td>A. You know, I don't -- I don't prepare too many agendas. I'm known just to work through lunch and let's get meetings done, and that's it. So --</td>
<td>A. I don't recall.</td>
</tr>
<tr>
<td>Q. Uh-huh. So there's -- does anybody take minutes or -- it sounds like a -- more on the informal side --</td>
<td>Q. Have there been any of those meetings with your county managers, either over the phone or face-to-face, where -- where you have pointed to a</td>
</tr>
</tbody>
</table>
Case 1:09-cv-00668-JCH-DJS Document 88-19 Filed 07/09/10 Page 3 of 6

Delgado, Albert 4/26/2010

Page 37

1 particular office or offices that you thought
2 were -- was doing a good job of voter registration?
3 A. I don't recall.
4 Q. Well, just sitting here today, do you
5 think that there are any offices within your region
6 that have done a particularly good job of voter
7 registration?
8 A. Well, I -- you know, I don't know. I
9 guess there are -- there are some offices that do a
10 good job. But then, a good job could be very
11 subjective to interpretations. And so --
12 Q. Okay. But if I understand what -- what
13 you said before, you've -- you've never -- you
14 haven't -- you don't recall having -- having told
15 your county managers that there was a particular
16 office that was doing a particularly good job of
17 voter registration?
18 A. I don't recall in the group setting.
19 Q. How about individually?
20 A. Individually, yeah, I probably have. I
21 have.
22 Q. In the group setting, same question,
23 except bad instead of good. Have there been any
24 offices in the group setting that you've identified
25 as doing a particularly bad job of voter

Page 38

1 registration?
2 A. No. I don't recall that, either.
3 Q. Okay. So let's -- let's double back and
4 let me ask about the individual setting, in the
5 course of individual conversations. Have there been
6 individual conversations with your county managers
7 where you've identified a particular office that's
8 having done a good job of voter registration?
9 A. Yes.
10 Q. Okay. And what -- what office did you
11 identify as having done a good job?
12 A. San Juan office, McKinley, Los Lunas. And
13 Sandoval has improved.
14 Q. In reaching the conclusion that those
15 offices had done a good job, how did you -- how did
16 you go about assessing how it was that they were
17 doing a good job?
18 A. Well, like I said earlier, it's very --
19 there's no established goals to get any kind of
20 registrations or number of registrations. So I
21 guess anything other than zero is a good -- good
22 thing.
23 Q. Anything else?
24 A. No.
25 Q. And who -- who did you -- who did you

Page 39

1 inform that those offices had done a good job?
2 A. Well, I talk to the county manager, county
3 director.
4 Q. For the respective offices?
5 A. Uh-huh.
6 Q. In other words, San Juan County, you would
7 tell the San Juan county manager that they were
8 doing a good job?
9 A. Yeah.
10 Q. Were there any occasions where you would
11 call another county's manager and say, not -- and
12 say that another county was doing a good job? If
13 you see what I mean, that, you know, if I'm a county
14 manager, you call me and say, "That county manager
15 over there is doing a good job. Why don't you do
16 more of that?" Any occasions where you had a call
17 like that, where you pointed out another office to a
18 particular county manager?
19 A. I might have pointed it out to another
20 county office manager, yeah, to do that.
21 Q. Do you recall who that was? When?
22 A. I don't recall when. But it -- I don't
23 even remember who it was.
24 Q. Okay. All right. Let me ask the same
25 kinds of questions about offices that -- any offices

Page 40

1 that you concluded were doing a bad job of voter
2 registration. Were there any particular counties
3 that you called and told their county managers,
4 county directors, that their office was doing a bad
5 job of voter registration?
6 A. Well, I wouldn't phrase it as a bad job.
7 I might ask why are there so low registrations in
8 their office, or why is there zero, if there was a
9 zero.
10 Q. Do you remember which offices you
11 contacted to have these types of conversations?
12 A. I probably contacted -- I mean, I can't
13 think of a -- I'm trying to think who would I -- I
14 think I probably contacted McKinley office, Sandoval
15 office.
16 Q. With regard to McKinley --
17 A. Maybe the Cibola office.
18 Q. With regard to McKinley, you had
19 earlier -- if my notes are right, you earlier said
20 that you had told McKinley that they were doing a
21 good job. So did -- was that after your
22 conversation, where you informed the manager that --
23 that -- where you had this conversation asking why
24 the numbers were low?
25 A. Right.
registration outside of those quarterly meetings.
And, you know, if it's a lot, tell me the
categories, and then we can discuss them and -- you
know, I just want to get a good understanding of
that. So do you understand the question now?
A. Well, I think I do, is what -- I try to
just kind of remind the county directors outside,
from what we were talking about, is to remind the
staff about registering applicants when they come in
for assistance, you know. We try to do that.
Q. Have any -- have any -- you say that you
remind the directors. So if I use the term
"reminders," is that fair to -- what I want to ask
you is have you sent e-mail reminders --
A. No.
Q. -- to the directors?
A. No.
Q. Have you written any memos to the --
A. No.
Q. -- directors? Do you -- do you regularly
use e-mail to communicate with -- with the county
directors?
A. I'm not a big e-mail fan. I use the phone
a lot, when I'm not -- I do call them.
Q. Does that mean that your typical practice
is to use the telephone for communication with
the -- with the county directors, as opposed to
e-mail?
A. Right. Old school.
Q. People with overflowing inboxes understand
that.
MR. KENGLE: This might be a good time to
take a five-minute break.
THE WITNESS: Okay.
MR. KENGLE: Is that all right?
MR. TERRY: Take all the time you need.
(A recess was taken from 10:18 a.m.
to 10:29 a.m.)
Q. (By Mr. Kengle) Let me direct your
attention back to the issuance -- to the time in
January 2008 when the GI that we've discussed was
issued. Is it correct that Ted Roth was your
supervisor at that point?
A. Yes.
Q. Now, after -- after that GI was issued,
have there been occasions where Mr. Roth spoke to
you about the voter registration activity within
your region?
A. There might have been.
Q. Do you recall any specific occasion where
Page 49

1. Mr. Roth discussed voter registration with you?
   2. A. Not specifically.
   3. Q. Do you have -- can you estimate for me, during the year -- the calendar year 2008, the number of occasions on which Mr. Roth spoke to you about voter registration within your region?
   4. A. I -- no. I have no recollection of how many times. I couldn't give you a number.
   5. Q. More than one?
   6. A. More than one, maybe, yeah.
   7. Q. More than ten?
   8. A. Maybe not more than ten. I just don't recall how many.
   9. Q. In 2008, did Mr. Roth discuss any particular offices with you with regard to voter registration?
   10. A. Yeah. I think we did in one of the conversations we might have had.
   11. Q. Do you recall which office?
   12. A. I think it was the Sandoval office.
   13. Q. What did Mr. Roth tell you?
   14. A. I'm trying to recall. But I -- I think he asked me how we were -- how the Sandoval office might be offering voter registration.
   15. Q. Did he ask anything else?

Page 50

1. A. I don't recall. I mean --
2. Q. What did you tell Mr. Roth in response to his question?
3. A. Well, the Sandoval office is in this process model, where we have a greeter, and then we have interviewers up in the front reception area. And I believe the conversation was, "Do we offer registration at the greeter's or at the interviewer?"
4. Q. I'm sorry. Was that his question or your --
5. A. I'm trying to recollect. I think that's what he was asking me. "Do we offer registration at that interview or at the greeter's station?"
6. Q. And so what was the answer?
7. A. Oh, God. I think I told him, "I'll get back to you."
8. Q. Oh, okay.
9. A. Because I know it was happening -- you know, it was supposed to be happening at the interview. But I wasn't sure about the greeter's station.
10. Q. During that conversation, did Mr. Roth direct you to do anything in particular with regard to the Sandoval office?

Page 51

1. A. No.
2. Q. As you understand your respective responsibilities, his powers and your powers, does he have the power to direct you to do something within -- within your job-related activities?
3. A. Yeah. He would.
4. Q. And with respect to the relationship between you and the -- and the county directors, do you have the power to direct the county directors to take certain steps or stop taking certain steps within their job responsibilities?
5. A. I would think I would, yeah.
6. Q. Now, I had been asking, in that previous set of questions, about conversations between you and Mr. Roth about -- about conversations during 2008, calendar year 2008. And let me ask now about calendar year 2009. Did you have any discussions with Mr. Roth about voter registration at your region's offices during 2009?
7. A. I mean, we probably have. I just can't pinpoint a time.
8. Q. When you -- earlier, you -- you had indicated that the number of such discussions was probably more than one and less than ten. Is -- is that, would you say, the same thing here? More than one or less than ten? Or some other number? I'm just trying to get an estimate from you of how many conversations occurred.
9. A. More than one, less than ten. That sounds -- I mean, I can't recollect how many times.
10. Q. Would -- is it your practice to write down notes when you would have a conversation like this with Mr. Roth?
11. A. Those conversations with Mr. Roth, to my recollection, were mostly by phone.
12. Q. Uh-huh. And would you -- would you -- do you typically take notes during conversations like that?
13. A. I doodle a lot, circles on my doodle pad, but --
14. Q. He may read that. Oh. By the way, did -- have you -- have you read the deposition of Mr. Roth that was taken in this lawsuit?
15. A. No.
16. Q. Has anybody -- has anybody told you what Mr. Roth's testimony was?
17. A. (Indicates.)
18. MR. MALONEY: Was there a verbal response to that?
19. MR. TERRY: Sure. Go ahead and -- go

13 (Pages 49 to 52)
Delgado, Albert

Page 53

1. ahead and answer with an oral statement. Did you read Ted Roth's deposition?
2. THE WITNESS: No.
3. MR. TERRY: Did anyone tell you what Ted Roth's testimony was?
4. THE WITNESS: No.
5. Q. (By Mr. Kengle) Thanks. That -- I apologize. That was one of the instructions that I left out at the beginning of the deposition.
6. A. So it's his fault.
7. Q. It was. I accept that responsibility. Please do, for the court reporter, answer the questions with a yes or no or verbal response of some type so that it can be put down in the transcript.
8. A. I guess I was -- I forgot about the court reporter, and I was looking at you. But he acknowledged my answer.
9. Q. All right. Let me ask about this -- about this year. We're several months into 2010. Do you recall having any conversations with Mr. Roth about voter registration in your region during 2010?
10. A. No. I don't recall any conversations this year.
11. Q. As a regional manager, do you have -- do you have occasion to meet with the -- with the director of HSD?
12. A. Yes.
13. Q. How -- does that occur on a regular basis?
14. A. No.
15. Q. Who's the current director?
17. Q. Have you ever had occasion to discuss voter registration within your region with Helen Nelson?
18. A. No, not that I recall.
19. Q. And had you ever discussed voter registration within your region with any of the previous directors before Ms. Nelson?
20. A. I don't recall.
21. Q. Within -- within HSD, you're at the regional manager level. Your supervisor is currently a deputy director. Then there is a director. Now, would it be correct to say that there are other -- there are other higher level management officials within HSD than just the director and the deputy director who's your supervisor? Correct?
22. A. Correct.
23. Q. So when I say "upper management," I'm referring to management positions within the agency above the regional manager level.
24. Have there been any occasions during -- during your tenure as a regional manager during which you've discussed voter registration with an upper level manager within the agency other than your immediate supervisor or the director?
25. A. I do not recall having that discussion.

Page 54

1. Q. Does HSD management conduct annual meetings of the agency --
2. A. No.
3. Q. -- managers? Is there -- is there any type of regular meeting for upper level agency management?
4. A. Now, "upper level," meaning --
5. Q. At your level and higher.
6. A. At my level? Yeah. We've had those meetings, yeah.
7. Q. Just speaking generally, in those meetings during your tenure as a regional manager, do you recall any of those meetings at which voter registration was discussed?
8. A. I don't recall. But there probably -- there probably had been -- has been some discussion, on National Voter --

Page 55

1. Q. You don't remember?
2. A. I don't remember.
3. Q. We've spoken earlier about how you will interact with the managers at the -- for the county offices that you supervise. Do you -- do you also interact with the -- with the staff in those offices below the manager level?
4. A. What do you mean by "interact"? You mean, like --
5. Q. Talk to them?
7. Q. And does that -- are there any particular types of positions that you -- that you -- or persons that you talk to more frequently than others? Is there a certain class of staff that you talk to more frequently than others?
8. A. I guess, if I understand the question, other than the county manager, I -- I do talk to the rest of the staff.
9. Q. And is that to -- does that go beyond just sort of meet and greet and saying hello? Do you discuss the substantive duties of their positions when you do that?
10. A. No.
11. Q. Okay. So, if I understand that correctly,