

1 THE COURT: Okay. This is Exhibit 25.

2 MS. LEEPER: Yes, it is. Plaintiff's Exhibit 25
3 pages 16, table two.

4 THE COURT: Thank you.

5 MS. LEEPER: And we can start over from here.

6 Q. (BY MS. LEEPER) Looking at the column 2025 CD5. Do
7 you see those numbers there?

8 A. Yes.

9 Q. And the Metro Core is 426,340, right?

10 A. Right.

11 Q. Metro Outlying is 114,024?

12 A. Correct.

13 Q. Did just those numbers alone tell the full story
14 about what communities are included in 2025 CD5?

15 A. No, I wouldn't say they do.

16 Q. Okay. Let's pull up a side-by-side, if we can,
17 looking at page 18 of your initial report. Plaintiff's Exhibit
18 25, figure five. And then also at the same time we're going to
19 be looking at Plaintiff's Exhibit 25, page 20, figure six. Can
20 you remind me what these two maps are here?

21 A. These are showing the RUCA codes for this part of
22 western Missouri comparing the congressional districts of 2022
23 with those of 2025?

24 Q. And for the Metropolitan Core what color is that on
25 this map here?

1 A. It's dark blue.

2 Q. And the Metro Outlying is?

3 A. Light blue.

4 Q. Okay. And the remainder colors those are all rural;
5 is that right?

6 A. Rural, Nonmetro. Yes.

7 Q. Okay. So what do you see here in the contrast
8 between the Metro Core portions that are included in CD5 in

9 2022 versus the metrical portions that are included in CD5 in
10 2025?

11 A. In 2022, the territory included in CD5 was
12 exclusively in Kansas City. In 2025, the Metro Core population
13 included, not only Kansas City but Jefferson City and parts of
14 Columbia.

15 Q. Is the fact that Jeff City and Kansas City are both
16 coded as urban and that they both have Metro Core portions,
17 does that mean that they automatically share all the same
18 concerns?

19 A. No.

20 Q. Would you consider Jeff City and Kansas City to be
21 closely united territory in the same way that you considered
22 the Kansas City Metro area to be closely united territory?

23 A. I would say that within -- among the hierarchy of
24 Metropolitan areas there can be significant differences between
25 very small Metropolitan areas and very large ones. So I would

1 think that there would be differences in the population
2 dynamics associated economic outcomes for very large
3 Metropolitan area like Kansas City compared with one of the
4 smaller Metropolitan areas in the country with Jefferson City.

5 Q. And you say you would think. What do you think that
6 based on, what's the basis of that opinion?

7 A. From years of studying differences by size of
8 Metropolitan areas. It was not my primary focus. Primary
9 focus is in this very significant divide between
10 Nonmetropolitan areas and Metropolitan areas. But I have -- I
11 did -- I do have knowledge about how differences emerge among
12 cities of different sizes as well.

13 Q. We'll talk a little bit about the analysis that you
14 did regarding the urban-rural divide in western Missouri. In
15 the section of your report, where you're discussing the
16 characteristics of rural and urban areas were the conclusions
17 that you drew about western Missouri based only on national
18 data and information?

19 A. No.

20 Q. What did you look at on the Missouri specific level?

21 A. I did background work. I studied a number of
22 secondary sources. I looked at a number of web-based mapping
23 applications that provided a whole range of economic indicators
24 showing those sort of rural urban difference within that part
25 of western Missouri.

1 Q. Okay. Earlier we talked about the Atlas of Rural and
 2 Small-town America, and you said you had looked at that for
 3 this assessment. What's included in the Atlas of Rural and
 4 Small-town America?

5 A. A very large range of classification systems such as
 6 the USDA's county psychology codes. It includes a range of
 7 demographic indicators, population change, net migration et
 8 cetera. And it includes a range of economic and social
 9 indicators such as unemployment, poverty, education.

10 Q. And is that information provided on the national
 11 level or were you able to look at that specifically for this
 12 region of Missouri?

13 A. They're provided for counties. So you are able to
 14 zoom in to various regions, including western Missouri.

15 MS. LEEPER: Dr. Cromartie, thank you for your time
 16 today.

17 THE WITNESS: You're welcome.

18 THE COURT: Additional questions?

19 MR. ELLINGER: No additional questions from the
 20 intervenor, Judge.

21 MR. SULLIVAN: None from the state.

22 THE COURT: You can step down. Thank you.

23 THE WITNESS: Thank you.

24 THE COURT: Call your next witness, please.

25 MR. PHILLIPS: Plaintiffs call Mayor Quinton Lucas.

1

QUINTON LUCAS,

2

having been first duly sworn by the Court, testified:

3

DIRECT EXAMINATION

4

BY MR. PHILLIPS

5

Q. Good afternoon. Ben Phillips on behalf of the Wise

6

plaintiffs. Could you please say and spell your name for the

7

record?

8

A. My name is Quinton Lucas. Q-U-I-N-T-O-N. Last name

9

spelling L-U-C-A-S.

10

Q. And what is your current occupation?

11

A. My current occupation is a public servant. It's

12

better than politician, and I serve as the mayor of Kansas

13

City, Missouri.

14

Q. How long have you been the mayor?

15

A. I've been the mayor of Kansas City since

16

August 1, 2019.

17

Q. And what position did you hold before you were the

18

mayor?

19

A. I served as a City Councilman in Kansas City for the

20

four-years preceding that.

21

Q. What district did you represent?

22

A. I represented the third City Council district

23

at-large. That is area basically Troost Avenue over to the

24

eastern edge of the city, and then points south and north that

25

are Independence Avenue to about Brush Creek.

1 Q. Do you live in Kansas City?

2 A. I live in Kansas City, yes.

3 Q. How long have you lived in Kansas City?

4 A. I was born in Kansas City. I guess, I would say it
5 this way. I have lived in Kansas City and been a resident my
6 entire life. I was out of Kansas City for seven-years
7 obtaining an undergraduate degree and law degree.

8 Q. And which parts of the city have you lived in?

9 A. Almost too many to mention. But most of my life for
10 the longest period of time in life, I lived on the east side of
11 Kansas City 19th and Paseo, which is near the 18th and Vine
12 Jazz District that is on the east side of Kansas City. I lived
13 east of 71 Highway for a number of years in my youth. Lived in
14 extreme south Kansas City at one point, and currently live in
15 the western portion of Kansas City.

16 Q. Do you have family in this area?

17 A. I do have family in this area. Yes, sir.

18 Q. Why did you run for City Council when you did that?

19 A. I ran for City Council because I think I had seen
20 sometimes generational problems and concerns, like, housing and
21 transit improvement, and I thought I could make a difference in
22 improving the quality-of-life for Kansas Citians.

23 Q. And after your time as member of the council, what
24 made you run for mayor?

25 A. You know, I think that I learned a lot during my time

1 with City Council. One was how much more impactful you can be
 2 as mayor when you get to a point, like, 300 people and you get
 3 a big staff. But more than that, I think that a lot of the
 4 things that I wanted to see change in the world could be best
 5 leveraged from the position as mayor. I will also note that
 6 there were about 12 people running at that time, too. So all I
 7 needed was my mom and five friends to vote for me, and then you
 8 got to break through a primary.

9 Q. What have you come to learn about Kansas City during
 10 your time as mayor?

11 A. What I have learned about Kansas City, you know, some
 12 will be lighter, some more challenging. From the lightest
 13 part, I've learned that anytime you have a meeting on one end
 14 of Kansas City, like, near the airport that meeting right after
 15 it is 45-minutes away to the south. And so we're a city that
 16 is an interesting one. No doubt. I have also learned,
 17 however, that almost everyone is welcoming.

18 Everyone feels like they're part of our community.
 19 And I think more to the point that we're a city that while it
 20 has its challenges is a dynamic growing place and one of the
 21 best to live in America.

22 Q. Do you feel like you understand this city?

23 A. Most days, yes, I do think I have a understanding of
 24 the city. I think I have understanding of its electorate, even
 25 if some days I might frustrate them and they may frustrate me.

1 Q. How did you come to have that understanding?

2 A. I spend almost every day meeting with lots of
3 different people in different parts of Kansas City. And so
4 obviously you engage with media. Unfortunately, I'll say
5 social media as well. But I think I spend a good deal of time
6 actually just talking to the people in Kansas City both in
7 events that I plan but certainly events that I attend.

8 Q. What are some issues that you've prioritized during
9 your time as mayor?

10 A. During my time as mayor, I have spent a lot of time
11 thinking about and working on housing. Access to affordable
12 housing in Kansas City. Producing more housing in areas that
13 have been historically underrepresented in housing development.
14 And so that is probably the one of which I have the greatest
15 pride. We have certainly spent a good deal of time on transit.
16 Public transit access. Finding ways that we can get
17 people to work and school more efficiently or affordably. And
18 then of course given the years that I have been mayor of Kansas
19 City the pandemic was a large part of what some of my work was.
20 Something that I don't directly control and spend a lot of time
21 with including today. I also like to work with our public
22 schools. Talk to young people.

23 Q. I want to ask you some questions about some of these
24 starting with housing. What are some of your priorities and
25 accomplishments related to the housing?

1 A. So in housing, actually, when I was a City Councilman
 2 I introduced an ordinance for affordable housing trust fund.
 3 Of course as a Councilman that ordinance had no funding
 4 attached to it at all. It was just kind of aspirational.

5 Fortunately, for me perhaps and the people of Kansas City, in
 6 my opinion, when elected mayor I was able to push a bond
 7 election. We were able to capitalize an affordable housing
 8 trust fund of \$75 million, which has produced thousands of
 9 units helping people get off the streets to get to more stable
 10 housing patterns.

11 Something that having known homeless in my youth was
 12 something that I found to be very valuable.

13 Q. Are there any particular housing developments that
 14 you're proud of or focused on?

15 A. You know, I will mention, I think, I'll start with
 16 one, and that is the Parade Park Homes Development. -- Parade
 17 Park -- my mother lived until somewhat recently. It was a
 18 Black cooperative that had this mixed income, mixed aged
 19 community where you had elder ladies who were part of it, but
 20 also families and so many others. There's a 300 million-dollar
 21 plus redevelopment going on now. Roughly 1100 units of housing
 22 to come in.

23 Hopefully, housing thousands of Kansas Citians. And
 24 I think building real opportunity in our inner-city.

25 Q. How is that Parade Park development funded?

1 A. So that Parade Park development is funded through a
2 few different sources. One of which is local government and
3 our housing trust fund, that's been very helpful for us. The
4 other part is federal resources and support to the Parade Park
5 development, and that has been a key part of us getting things
6 accomplished there. And then there is a smaller state
7 allocation in connection with Parade Park.

8 Q. Those federal funds you mentioned, where do those
9 come from?

10 A. They are largely coming from the United States
11 Department of Housing and Urban Development. And HUD has
12 worked with that project in a few ways, both as a receiver at
13 some point. That development went through a receivership
14 process and HUD was intricately involved ensuring that we could
15 facilitate a transfer, as well as more elective funds in recent
16 years that are coming from HUD allocations.

17 Q. I want to move to another topic you mentioned, which
18 is transportation. What are some of your priorities and
19 accomplishments related to transportation?

20 A. So I would suggest maybe two in that area.
21 Obviously, the streetcar. A fixed rail transit system in
22 Kansas City has been built and has expanded. I remember having
23 a trial in this courthouse some years ago when I was practicing
24 law lawyers were saying do you really not have fixed transit to
25 get around. And so we seen improvement there.

1 And we have a fairly lengthy line that takes you from
 2 the Missouri River, close to the Missouri River now I should
 3 say, all the way down to the Country Club Plaza area of Kansas
 4 City. That is a several hundred million-dollar project. And
 5 it has opened its longest expansion -- within the past year
 6 we'll have another expansion opening this spring. On the bus
 7 system itself zero fare transit, an ambitious concept. One
 8 that has gotten us attention, both wanted and not.

9 But one that has provided hundreds of thousands of
 10 free rides to Kansas Citians over the past five and half years.
 11 I have several areas of pride, I think, in public
 12 transportation policy.

13 Q. I want to ask you about that streetcar project. How
 14 is that project funded?

15 A. That project is funded through a mix, like, a lot of
 16 our infrastructure and transportation projects in Kansas City
 17 and I assume other cities, which is that you have your local
 18 contribution. Through that we used the transportation
 19 development district. Local taxpayers basically paid for about
 20 half of it. The other portion coming from substantial federal
 21 grant activity through the Obama -- Trump won. Biden and Trump
 22 administrations.

23 And without that support that project would not
 24 exist.

25 Q. How does the streetcar connect Kansas City?

1 A. Well, the streetcar connects Kansas City through a
2 number of different ways. One of which is development nodes.
3 I think we're a delightful place, but it seems as if generation
4 we say all right we've had enough of downtown let's move, you
5 know, two miles south and development a different area. And so
6 you catch a lot of things that exist on a linear path in
7 Kansas City. That being said, they're not entirely walkable.
8 And so the streetcar I think helps connect our
9 communities better. Particularly nodes of commercial activity.
10 It has made it an easier city to market for major events.
11 World Cup 2026. It's also made it an easier market for folks
12 to get around expending less cost.

13 Q. How are the transportation needs of Kansas City
14 distinct, in your opinion?

15 A. Well, look I think that for Kansas City we're blessed
16 with a good level of density, particularly in areas where you
17 see the greatest amount of activity in the streetcar system and
18 transit, as well as our bus system. And so that is I think a
19 distinct and important area for us. There is also, of course,
20 traditional lines of segregation that impact our city. So a
21 lot of our more important bus routes go east, west taking you
22 through areas let's say, like, downtown to the east side of
23 Kansas City. Historically Black.

24 Different income outcomes, all of that. And so I
25 think you see those connections in a fairly tight space in

1 Kansas City.

2 Q. Are there any environmental issues that you've

3 focused on or had accomplishments in as mayor?

4 A. Yes. It's a work in progress, of course. You know,

5 to be a mayor in an American city is to understand the

6 environmental protection agencies water regulations. They've

7 gone through a substantial overflow control program in Kansas

8 City really over the past 15 years. A lot of that in its

9 simplest sense separating storm water sewers from sanitary

10 sewers. Fun. Exciting. Right.

11 But rather expensive work. End-run goal is to make

12 sure that we're finding new ways to lay new sewers. Finding

13 new ways to lay the new streets over them. Substantial costs,

14 but to make sure that we're putting clean water back into the

15 Missouri River after it's used in Kansas City.

16 Q. And how are those efforts funded?

17 A. Those efforts were funded our rate payers would say

18 on their backs. And there were substantial investments by the

19 rate payers of Kansas City Water Services. But also, of

20 course, extensive federal grant activity to ensure that we

21 could lay out, I think, proper funding and planning for

22 overflow control programming.

23 Q. Are there any other environmental development issues

24 that you're focused on?

25 A. Yeah. Preferably, two more that I would focus on one

1 is Brush Creek in Kansas City. It's a body of water that flows
2 east-west in Kansas City. It's been a subject of substantial
3 flooding. In the late 1970s there was a flood that hit a
4 popular commercial and shopping district in Kansas City, so we
5 saw improvements in the 1990s there. But we continue to see
6 needs for both flood control and environmental protection,
7 particularly, in the historically Black east side of Kansas
8 city, that work is ongoing.

9 And we continue to seek grants and obtain them on
10 occasion in that area. I'll also note when Brownfields
11 Development, which is really kind of one of the more exciting
12 areas of, I think, EPA policy. You get grants from the federal
13 government. And we've been recipients of them as recently as
14 the past year to invest in environmental cleanup and properties
15 that then allows to build new structures. Sometimes housings,
16 sometimes buildings.

17 The most famous example in Kansas City is a gigantic
18 women's soccer stadium, that is close to the Missouri River.

19 And that is the sort of work that, I think, we've seen in
20 Brownfields policy in Kansas City.

21 Q. Both on the Brush Creek project and the Brownfields,
22 where did those grant money come from?

23 A. Well, that money comes, I guess, if I was being
24 really kind for the tax payers of America, but I would note
25 that that grant money comes from the EPA. Usually we go

1 through a substantial application process. We're reviewed and
2 compared against other American cities. Obviously our federal
3 delegations cannot be supportive in those allocations. And
4 then we are typically awarded in most cases a regional
5 administrator in Kansas City or nearby comes to award us those
6 grants.

7 And that's how we keep things moving with the
8 redevelopment here.

9 Q. So in all these issues that we've talked about
10 housing, transportation, environment you mentioned federal
11 grants. How does Kansas City secure those grants?

12 A. I think there a few different ways. Obviously, you
13 go through the baseline work of applying for federal grants and
14 when you do that you submit them. Another key part is, of
15 course, you almost always call your local federal
16 representative. In some situations federal representatives and
17 say we are applying for this grant. Can we have your support?

18 Can you make these calls to relevant agencies? Can
19 you in some way, right, give us some greater attention in
20 connection with what we are trying to accomplish long term?

21 Q. Can you say a little bit more of that? How does that
22 work? How does your federal representative help get these
23 grants?

24 A. Yeah. I think that the way they do it, typically,
25 they employ a staff in Washington and here back in Missouri. A

1 lot of their work is engaging with federal actors. A lot of it
2 also, of course, relates to securing funding within bills and
3 other items. A lot of that relates to long-term political work
4 relationships that they will have. And so for us usually it's
5 regular meetings, if not regular run-ins with our federal
6 representation.

7 It's making sure they're informed of what our
8 interests are. We do layout and pass legislative priorities
9 each year for Washington. And we share those extensively. We
10 visit with our official, and we go on from there to see how
11 successful we can be. When we find areas of challenge, for
12 example, we're working on east-west streetcar expansion now.
13 We also then often bring back in more recent example
14 we invited Congressman Emmanuel Cleaver to join us for
15 east-west streetcar study on 18th Street. And usually it's
16 through that consistent relationship that you ensure federal
17 partners are informed.

18 Q. I want to ask one question about the east-west
19 streetcar. Why is that an important project to study?

20 A. We need to bridge divides in Kansas City. So we have
21 legacy divisions that really, I think, center around race. Our
22 city was legally segregated for some time. Of course, now we
23 just see existing residential patterns that separate us. The
24 18th Street connection is really looking to find a way to break
25 through that traditional line that divides us, and to assure

1 that there's steady stream of development and connectivity
2 between our Crossroads area south of downtown and this
3 courthouse and the 18th and Vine area in Kansas City, which is
4 kind of a historic Black downtown type district.

5 Q. What is that legacy divide, and what have been some
6 other efforts to bridge that divide over your time as mayor?

7 A. So, you know, the legacy divide is Troost Avenue in
8 Kansas City. It has been one that gets a lot of attention.

9 This summer I walked ten miles on Troost with a coterie of
10 other individuals along the way to bring attention to business
11 opportunity on the street to try to remove some of the stigmas.
12 A lot of those stigmas stem from the fact of White Kansas
13 Citians and others from our suburbs, right, going to the east
14 side, is something that we try to bridge. So some of that is
15 just through pure exposure.

16 The aforementioned housing investments are important
17 part of that work as well. Us making sure that we are
18 stimulating development east of Troost, I think, is something
19 that is key for us. And then always whenever we can look to
20 either from transportation, like, the streetcar to educational
21 opportunities near Troost or on it trying to find ways that we
22 show that there is not a wall. And it's that there's an
23 opportunity for us to flow between both sides of our city
24 pretty flawlessly.

25 Q. You mentioned earlier the 71 Highway. What role does

1 that play in these divides or efforts to bridge the divide?

2 A. 71 Highway, if I had all the time in the world and
3 you all are busy, but it is one of the more interesting both
4 divisions and public infrastructure projects, probably in the
5 history of Kansas City. We were looking at its core at a
6 faster way for suburban growth for the south -- from the south
7 to get to downtown Kansas City. Our engineers and
8 transportation planners in generations past studied a number of
9 different routes. They chose to put the route through the
10 majority Black community of Kansas City. That is not just east
11 of Troost.

12 It's for much of the traffic east of Prospect Avenue.
13 What that means is that 71 Highway itself divides Kansas City.
14 I would say structurally a stronger way than does Troost.

15 Troost is four-lanes, maybe six-lanes tops. Right. 71 Highway
16 is a big highway.

17 Big median. Lot of space. Hard to walk across. And
18 you see very different residual patterns. Frankly, you see
19 very different life expectancies and others on the different
20 sides of 71 Highway.

21 Q. What efforts have there been to help bridge that
22 divide created by the 71 Highway?

23 A. Kansas City was fortunate enough to receive a
24 reconnecting communities grant. This also came recently from
25 the prior administration. In that we received \$5 million to

1 begin a study on ways that we can look to build safer
 2 transportation really walking routes over the highway as a step
 3 one. Ways that we can look to better transportation through
 4 traffic planning long-term. And ultimately, ways that we can
 5 try to remove certain impediments that lead to higher asthma
 6 rates in that community.
 7 Lead to higher incidents of traffic fatalities and
 8 crashes in that corridor. And make us more welcoming to
 9 development in that corridor as well.

10 Q. And how is that project funded?

11 A. That project was funded almost entirely by the United
 12 States government. And so that was through an opportunity that
 13 came from what I still call the infrastructure bill. IIJA. And
 14 that was something we were able to receive from federal funding
 15 that I wanted.

16 Q. Do you ever talk with leaders in other parts of
 17 Missouri?

18 A. I do talk to leaders in other parts of Missouri.

19 Yes, sir.

20 Q. And based on those conversations or, I guess, based
 21 on your understanding of the state, what differences are there
 22 in the priorities in Kansas City as compared to some of those
 23 other places?

24 A. I think that there are a few that I've seen during
 25 time as mayor. One of wish just speaks to what difference

1 density means for you. Right. And so we had more population.

2 It means public health crises can be more acute and pronounced.

3 Something I talked a lot about during the pandemic.

4 It means that public safety issues are more acute.

5 Frankly, we have more interdiction work that is done by the

6 Kansas City Police Department than any agency near us. Part of

7 that is because all the highways meet here. Lots of folks

8 congregate here. Right. We end up with 800,000 or million

9 people at a Chiefs celebration.

10 And so you have both the costs, but also the

11 responsibilities that relate to this. The venues that Kansas

12 has, the challenges, the opportunities all of those I think are

13 in many ways largely unique to Kansas City and its role as a

14 major city in this part of western Missouri.

15 Q. What unifies Kansas City as a place?

16 A. You know, I think beyond complaints about potholes

17 pretty uniformly I believe that obviously one thing that

18 unifies of us, I think, is how we have our kind and respectful

19 for each other. We are a welcoming community. We are a fairly

20 diverse community. But I think that it is a city that in its

21 density in its connection has for years had a large number of

22 Black population next to new arrival immigrant populations.

23 Mexican American population.

24 So many others together. And so I think that that

25 welcoming approach to Kansas City is part of why I've stayed

1 here. And I think it's also a part of why we continue to see
2 growth right now.

3 Q. You talked a little bit earlier about working with
4 congressional representatives. What congressional
5 representatives, which congressional representatives do you
6 work most closely with?

7 A. Well, like, I work most closely with Emanuel Cleaver.
8 The Congressman for the fifth congressional -- well, what I
9 know as the fifth Congressional District. He has been in
10 Congress since January 2005. Obviously, he was the mayor here
11 in years prior to that. And so work with him a lot.

12 I am certainly familiar with Congressman Mark Alford
13 from his television time. I have not worked with him as much
14 as a United States Congressman. Congressmen Sam Graves
15 Northland of Kansas City in northern Missouri is someone that,
16 obviously, I'm familiar with and we've engaged over the years.
17 And then Congressman Alford's predecessor, Congresswoman Vicky
18 Hartzler, I met once.

19 Q. What is your relationship like with
20 Representative Cleaver?

21 A. Well, I think it's been an interesting one and a
22 great one. I have learned a lot from the Rev. as we call him
23 in Kansas City. Obviously, he has been part of Kansas City and
24 Kansas City politics for longer than I have been alive. Longer
25 than many of us have. And I say that with respect.

1 Greatest respect to my elders. I think that he is
 2 pretty present in Kansas City. Very omnipresent. He is always
 3 an accepting phone call. I have his cellphone number.
 4 Speak to him. You can text, call. We've worked on a
 5 number of different initiatives together. And I would contend
 6 probably I've seen him almost every week for the last probably
 7 seven or eight-years.

8 Q. What impact does it have on the city for you to have
 9 that kind of relationship with Representative Cleaver?

10 A. The central goal of what we do in politics in public
 11 service is to get things done on behalf of our constituents.
 12 To get things done on behalf of the people of Kansas City you
 13 want somebody who you can call. You want somebody who knows
 14 about the issues in your city, who may know them even better
 15 than you. Somebody knows where appropriations are helpful in
 16 the core of our community what impact that they can have. And
 17 I think that, you know, I have not lived in other systems, but
 18 I think it is invaluable to have this type of connection.

19 Q. What role, if any, does -- or has
 20 Representative Cleaver played in securing some of the grants
 21 that you mentioned earlier?

22 A. In almost every grant that has been received during
 23 my time as mayor in Kansas City Congressman Cleaver's office
 24 has played a supportive role. I say almost because I don't
 25 want to speak in total absolutes, maybe there was one that got

1 by him. But I don't know of a grant that we've received in
2 Kansas City where Congressman Cleaver was not supportive. And
3 I would argue the lion share of those Congressman Cleaver was
4 the lead.

5 Q. What other roles does federal representation play in
6 impacting Kansas City?

7 A. Federal representation is key in a few different
8 areas for us in Kansas City. I think -- so one of which is
9 appointing officials that are recommending officials to the
10 president in terms of who works with us here. So that is --
11 sorry hearing aid died, so just talk loudly if you can. In
12 terms of the federal officials near us. There was an EPA
13 administrator, HUD administrator, HHS folks that we will work
14 with in this part of our country.

15 Those are actually to us the closest representatives
16 that we have of EPA. We don't see the nationwide administrator
17 all the time. We see the regional administrator far more.
18 With HUD that has been probably the most extensive. And the
19 folks that we have worked with very well have come recommended
20 by Congressman Cleaver.

21 And so I think that is probably one of the central
22 areas of where the federal government is present with us. I
23 will, of course, also note that there are those other areas
24 that in some ways seem like intangibles but are very important
25 to people as well from service academy appointments, to

1 actually ensuring that proclamations, other things where you
2 have some connection to your federal government are being taken
3 care of are things where an official who knows you, who takes
4 your call for response is very helpful for us all.

5 Q. You mentioned that during your time as mayor you've
6 had some interactions with other congressional representatives.
7 How frequently have those other people been present in the
8 community?

9 A. So I mean, I'll try to go through each. And I'll be
10 fair I respect the service of each and every one of them. And
11 I'll just go with members of the US House rather than perhaps
12 our United States senators. The former Congresswoman for the
13 fourth Congressional District Kansas City through most of my
14 mayoral term has sat in three congressional districts. The
15 narrow sliver on the south end in Cass County, Missouri, was
16 represented by Congressman Vicky Hartzler.

17 During our time in public office together, I bumped
18 into Congresswoman Hartzler once. It was in Washington DC.
19 She saw me. And she shared with me her concern as to why there
20 was not going to be a Chick-fil-A at the KCI Airport. For her
21 it was a political issue.

22 I didn't know much about it. I shared with the
23 congresswoman I got nothing to do with it. I eat at
24 Chick-fil-A, too. And you know, that is what it is. That was
25 that one.

1 With Congressman, Graves who has served our estate
2 for over two-decades, we last met in Washington in person, I
3 think shortly after the birth of my first child. That child
4 will turn five-years-old in about two months. And so the
5 meetings aren't frequent. We have probably bumped into each
6 other one other time during that process. Have great respect
7 for him, but that's just kind of the nature of that
8 relationship.

9 And then Congressman Alford, who is new, admittedly.
10 And so I believe we have had one meeting in Washington in
11 connection with his service thus far.

12 Q. You mentioned earlier the World Cup is coming up. I
13 understand the World Cup will be taking place in part in Kansas
14 City; is that right?

15 A. Yes, that's correct.

16 Q. What role does the federal government play with
17 regard to World Cup preparations?

18 A. You know, the federal government is very important in
19 terms of the World Cup. The president of the United States has
20 shown a great interest in the World Cup. He's appointed a FIFA
21 White House Task Force. And so I have been both in contact
22 with their leader Andrew Giuliani. But, of course, the larger
23 part of our work has been ensuring that there will be
24 appropriations.

25 And frankly, federal law enforcement work to help

1 support the World Cup matches in Kansas City in the base camp.

2 And so what we have seen is some substantial appropriations

3 that have come to us for World Cup security. That has been

4 important. I won't speak to the future. I think we'll

5 celebrate some of those coming up fairly soon.

6 And, obviously, working with federal agencies to get

7 as much support as possible for Homeland Security purposes and

8 others during the matches is something that's been central to

9 us.

10 Q. And has Congressman Cleaver played any role in these
11 preparations?

12 A. Yes. Congressman Cleaver has very actively been a

13 supporter and advocate for the federal funding support for

14 America cities, not just for security actually, but also

15 transportation. Kansas City is not necessarily the easiest

16 place to get around. Many people during the World Cup may be

17 staying in downtown Kansas City, but watching matches at

18 Arrowhead Stadium, which is on the far eastern edge of Kansas

19 City. How do we get thousands of people buses and others back

20 and forth? That's been a key reason why we are looking for

21 enhanced funding support and transportation, and why the public

22 safety funding has been so vital.

23 Q. On the subject of soccer. Does Kansas City have any

24 professional soccer teams?

25 A. Yes, we do. We have a national women's soccer league

1 team by the name of Kansas City Current. They play in the
 2 River Front. They play in that former Brownfield that I was
 3 talking about before. So win one for federal government policy
 4 being successful long-term.

5 And there is a men's soccer team that plays in our
 6 Kansas suburbs.

7 Q. Are you aware of any other cities in Missouri with a
 8 professional women's soccer team?

9 A. No, sir.

10 Q. From where in Kansas City do people come to attend
 11 soccer games?

12 A. I mean, I would contend that they come from all over
 13 Kansas City to attend soccer games. It's been pretty exciting
 14 to see the communities response and reaction. But that stadium
 15 on the River Front has created opportunities for people from
 16 all around Kansas City to come and celebrate the beautiful game
 17 played by some of the greatest athletes in the world.

18 Q. People both east and west of Troost come to the
 19 games?

20 A. That is correct, yes.

21 Q. I want to talk now about the congressional map. Are
 22 you generally familiar with the 2025 Congressional Map?

23 A. I am generally familiar, but I won't pretend to be an
 24 expert in it.

25 Q. Could we pull up Plaintiff's Exhibit 23, page 28?

1 What does this appear to you, Mr. Mayor?

2 A. Yes.

3 Q. What does this appears to be?

4 A. Oh, I'm sorry. What does this appear to be? This
5 appears to be the -- well, kind of a dead giveaway at the top.

6 But it appears to be the 2025 map.

7 Q. And as you look at where Kansas City is in this map
8 and what district it's in what reactions do you have to that?

9 A. So when it was first introduced it was fairly obvious
10 to me that it looked like it was a map intended to split

11 Kansas City. You see that with the narrow gap that exists
12 between the state of Kansas and what would be the new Missouri
13 fifth district.

14 Q. And when you look at where Kansas City is and what
15 other parts of the state are included now in the Congressional
16 District five what reaction do you have to that?

17 A. So I believe that while I love all of Missouri and I
18 know they're wonderful communities I think that there are some
19 very real differences that exist in the, frankly, more rural
20 areas within it. The other communities that are the smaller
21 size that have very different and varied challenges from what
22 we face in Kansas City. I say that with some confidence
23 because we are the largest city in Missouri and we deal with
24 issues that are really quite unique particularly as to
25 western Missouri.

1 Q. If we can pull up Plaintiff's Exhibit 302. Are you
2 familiar with the area shown on this map?

3 A. Yes, sir.

4 Q. What generally is the area shown in this map?

5 A. This appears to be a zoomed in image of what would be
6 the new 2025 map. To me what is probably the most interesting
7 point is the presence of three congressional districts all
8 through really one area of Kansas City that we commonly refer
9 to as the Historic Northeast.

10 Q. Is that northeast area connected to downtown Kansas
11 City?

12 A. It is. Right. You take Independence Avenue end --
13 really for those who don't know how roads are named usually
14 it's the city that you would be going to that was outside. So
15 Independence Avenue is how you got from Independence to Kansas
16 City. And those neighborhoods have always had a close
17 connection and relationship with the eastern edge of downtown,
18 both from work opportunities, social services. And what
19 appears to be occurring now, of course, is some change to that
20 relationship they've had.

21 Q. And when you look at the district lines what is that
22 change that you see?

23 A. So in our formal district most of this area, most of
24 it has been in one congressional district. The sixth district
25 has been close for a number of years in fairness. And so at

1 most you have representation of two districts. Inserting three
2 congressional districts to one area that considers itself one,
3 the Historic Northeast, I think creates more political
4 challenge for them. I would note that from my own experience.

5 Kansas City is currently going through a discussion
6 on the citing of a municipal detention facility, for example.
7 That facility would actually be on the far eastern edge of your
8 map. That being said, schools, other neighborhood associations
9 say you all are always forcing things into the northeast
10 because they see themselves as one area. And so anything that
11 probably takes them away from being one area, I think creates
12 less political power in their view and mine, frankly. And I
13 think has the effect of perhaps marginalizing their voices or
14 at least making them have to make three separate calls, three
15 different community meetings to speak to one issue.

16 Q. As you look at the way that this map divides Kansas
17 City into three different congressional districts what effect
18 do you think that will have on the efforts to unify
19 Kansas City?

20 A. It is not helpful. We all try our best in life to
21 adapt, but it is much easier for me now as a mayor, who my day
22 has been at a school on the east side of Kansas City and this
23 courthouse. A meeting further west downtown to be able to call
24 one person. And a lot of those different types of issues.
25 Calling three keeping them up to date. Seeing where the grant

1 activity is.

2 Frankly, even remembering where a space is in our
3 community and whose office you need to call, I think creates
4 more bureaucratic and administrative issues for us. Because
5 one thing I will also note, and if I may, I will give one
6 example, you have to make sure you speak to different offices.
7 The last administration the president of the United States came
8 to give a speech in Kansas City we actually had more
9 complications than you would think in terms of where will he
10 speak because the grants were going to one place. They wanted
11 a visual in another place, just administrative things that are
12 oddly a part of our days. And so the more challenges you have
13 the more difficult it becomes the more time you put into it.
14 And I think in some ways the less helpful it is for
15 your community.

16 Q. Thinking about the issue that we discussed earlier of
17 the east-west expansion -- transit expansion.

18 A. Yes.

19 Q. How would this division of Kansas City into three
20 districts affect that effort?

21 A. So it means that you for your grant activity would
22 have to get more people on board. Those peoples interest may
23 differ. To the extent that I have ever had a conversation, for
24 example, with the current fourth congressional officeholder on
25 infrastructure and transportation it was more about highways

1 and how efficiently people can get to points south of
2 Kansas City. It was not about urban rail transit. And so you
3 would have to spend the time to educate more officials in
4 connection with it.

5 You would have to make that there is support of each
6 official at least as to the proposals themselves. And then you
7 would want to keep them informed throughout the process.

8 Q. You mentioned that even under the 2022 existing map
9 there are bits of Kansas City that are in other districts, so
10 in away there's already more than one representative
11 representing Kansas City. Why would the change to the district
12 lines in the 2025 map matter?

13 A. With greatest respect to all of the officeholders
14 with whom I served and I been blessed to serve, I think that
15 there are different priorities as to what is impacting American
16 cities. I don't want to delve too much into the politics, but
17 the reason Congresswoman Hartzler reached out to me about
18 Chick-fil-A was not just the yummy chicken nuggets. It was
19 about at least a viewpoint as to their connection with gay and
20 lesbian Americans and her concern that our city was not being
21 as hospitable to values that may be more aligned with
22 Chick-fil-A leadership. I don't find that to be the most
23 important issue in Kansas City. I think activity with Congress
24 people that speaks to how we're developing housing.

25 How we're developing transit. How we're actually

1 cleaning up the environment. Indeed, cleaning up the
2 environment when the federal government itself is putting us
3 under directives to clean it up are the sorts of things that
4 Kansas Citians frequently discuss in which they are engaged and
5 having that unification of interests is something that is very
6 important for us. And so when it was represented -- when we
7 were represented by three different congresspersons, but one of
8 them having, frankly, almost no population in Kansas City it
9 was something that was, frankly, more tangential to our daily
10 work, rather than moving downtown itself. Right. Our
11 government center, our commercial center into a completely
12 different district.

13 Q. Does Kansas City have needs that are distinct from
14 other cities in western Kansas?

15 A. Missouri?

16 Q. I'm sorry.

17 A. Happens all the time. But yes, we do have differences
18 with western Kansas, too, if I could. But on western Missouri,
19 yes. I mean, a few of them that I've mentioned. And some of
20 them, frankly, are ones that I get critiqued on all the time.
21 Our public safety challenges are very different.

22 Our public safety and law enforcement needs are
23 different. Right. We have a police helicopter. None of their
24 city police departments do. There's a highway patrolman, but
25 that's an expense the people of Kansas City fund. Drug

1 interdiction work a lot of the steps that we take our very
2 different.

3 The amount of housing that we build. Homelessness
4 issues. We are a major city. We draw in a lot of population
5 that is not native to Kansas City. Right. That are looking
6 for resources and services.

7 We have more hospitals per capita and hospital beds
8 per capita than other communities. A major American city in
9 many ways is very different. And so that is why I think Kansas
10 City sits uniquely in the state of Missouri. Indeed, the state
11 of Missouri legislature can suggest the same. Right. We are
12 the only city in western Missouri that doesn't actually have
13 local political control of our Police Department.

14 I disagree with that perspective. But, nonetheless,
15 the state of Missouri sees us as unique either in how radical
16 we are or how poor we are at management. But nonetheless, I
17 think speaks to different public safety issues that are keenly
18 different than what is it faced in the rest of western
19 Missouri.

20 Q. So Kansas City has different needs than Sedalia, for
21 instance?

22 A. Yes, it does.

23 Q. Different needs than Jefferson City?

24 A. Very much so different than Jefferson City. Yes.

25 Q. Different needs from Warrensburg?

1 A. Yes, sir.

2 Q. As you look at the map, the 2025 map, how do you
3 think this will impact voters in Kansas City?

4 A. I think this has a likelihood of making a voter
5 believe that their voice matters even less than it does today,
6 which to me is one of the greatest concerns by the way an
7 American public life. And so someone let's say who lives in
8 the northeast, who right now knows their congressman has some
9 experience with them, may have seen him at one of many events,
10 may go to his church that he still frequently attends every
11 Sunday feels a connection in a way that someone who's
12 congressman is almost never in Kansas City. Right. Might not
13 feel that same type of representation and connection.

14 Q. You can take this down. Thank you. Mr. Mayor,
15 you're a busy guy. Why did you take the time to come testify
16 here today?

17 A. I think representation is important. You know, I
18 think regardless of the politics, I think somebody who speaks
19 to Kansas City is key for us and I think that is why I'm here.
20 I'm old enough to remember we have had competitive
21 congressional races in the Missouri fifth in a map that was
22 fairly similar. A Democratic Republican when Emanuel Cleaver
23 was elected to this position. So I don't see it as a partisan
24 perspective as much as it is I want somebody who cares about
25 us, who talks to us, who listens to us.