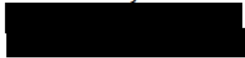


Federal Compliance Consulting LLC



Bruce L. Adelson
CEO/Attorney at Law



September 19, 2021

Marguerite Mary Leoni
General Counsel to the County of San Diego Independent Redistricting Commission



Dear Ms. Leoni:

We are submitting our proposal and Statement of Qualifications in response to the Request for Qualifications (RFQ) For Legal Services County of San Diego Independent Redistricting Commission: Special Voting Rights Act Counsel. Federal Compliance Consulting LLC is the responder and will be the prime contractor if awarded the Special Voting Rights Act Counsel contract.

Our responses to the RFQ follow below in numbered paragraphs matching the RFQ's Response Requirements.

1. Personnel

Bruce L. Adelson, firm CEO/President will be the lead attorney for this matter. I am available for an interview on the dates listed at a time to be mutually determined. As described in this proposal, we have significant experience with the Voting Rights Act of 1965 and the unique knowledge, experience, and expertise to provide requested redistricting consultation and voting rights assistance to the San Diego County Independent Redistricting Commission.

2. Attorney/Firm General Description

Bruce Adelson, Esq., is Federal Compliance Consulting's CEO and President. Our firm provides consultation, litigation, training and education, and legal services concerning compliance with federal laws and federal agency practice. Bruce has provided federal voting rights, election law, redistricting, federal compliance, diversity, implicit bias, and cultural awareness consultation, training, and educational programs for states, counties, municipalities, colleges, universities,

hospitals, clinics, physicians, nurses, educators, state courts, judges, law enforcement officers, and other organizations.

Federal Compliance Consulting's Bruce L. Adelson is a former Senior Trial Attorney and Attorney Advisor for the U.S. Department of Justice (DOJ), Civil Rights Division. Bruce's DOJ career spanned 2000-2006. Bruce founded Federal Compliance Consulting LLC in 2006.

Bruce is a Faculty Member in the Department of Family Medicine at Georgetown University School of Medicine and an Adjunct Professor of Law at University of Pittsburgh School of Law. Mr. Adelson is a peer grant reviewer for the U.S. Department of Justice and ADA Consultant to the Idaho Supreme Court and the New Mexico Administrative Office of the Courts.

3. Experience

Bruce has extensive redistricting and Voting Rights Act experience spanning three redistricting cycles, 2001, 2011, and 2021 as U.S. Department of Justice (DOJ) Voting Section Senior Trial Attorney (2000-2006), Voting Rights Act expert for the Arizona Independent Redistricting Commission (AIRC), redistricting expert and consultant for myriad counties, cities, school districts, and community college districts (2010-2016), and currently as redistricting legal counsel and expert during the 2021 cycle, including as Voting Rights Act Legal Counsel for the Michigan Independent Citizens Redistricting Commission, Voting Rights Act Consultant to the Alaska Redistricting Board and the County of Los Angeles Citizens Redistricting Commission, and Voting Rights Act Consultant or Counsel to Gila, Yuma, Navajo, and Mohave Counties, Arizona.

In his DOJ career and post-DOJ redistricting work, Bruce has extensively advised and consulted with state and local governments and the Arizona Independent Redistricting Commission (AIRC) about all aspects of redistricting, including but not limited to complying with the U.S. Constitution and Voting Rights Act Sections 2, 4, 5, and 203, preparing redistricting plans, preparing redistricting reports and presentations, preparing Section 5 submissions to DOJ, meeting with DOJ to discuss redistricting, analyzing data, analyzing election results, conducting racial bloc/racially polarized voting analyses, litigation, and conducting community involvement and outreach in redistricting.

At DOJ during the 2001 redistricting cycle, Bruce was the Team Leader for DOJ's Voting Rights Act (including Section 5) analysis of Arizona's 2002 and 2003 legislative redistricting plans, the Attorney General's Section 5 objection to Arizona's 2002 legislative redistricting plan and requests for additional information, Arizona's 2002 Congressional redistricting plan, New York City's 2003 City Council redistricting plan, Phoenix's 2002 City Council redistricting plan, redistricting plans for counties, parishes, special districts, and municipalities in Texas, Alabama, Arizona, Mississippi, New York, Louisiana, South Carolina, and many other statewide and local voting changes across the United States.

Unlike other consultants, we have the unmatched expertise and experience to understand the importance of community outreach and engagement in redistricting. For example, Bruce advised the Arizona Independent Redistricting Commission on locations for community redistricting meetings around the State of Arizona, including but not limited to on Native American Reservations, about outreach to different groups and communities, and about how to provide language access to limited English proficient communities.

Bruce's outreach advice has included providing in-person and video interpreters and translations for redistricting in such languages as, Spanish, Tagalog, American Sign Language, Vietnamese, Mandarin, Cantonese, Navajo, Hopi, Apache, O'odham, and many more in compliance with the Voting Rights Act, Americans with Disabilities Act, and 1964 Civil Rights Act.

Post DOJ, Bruce has given keynote voting & redistricting training and education presentations to many organizations such as the National Association of State Election Directors, National Conference of State Legislatures, National Association of Counties, International Municipal Lawyers Association, The Arizona League of Cities and Towns, Arizona Independent Redistricting Commission, Arizona State Bar, Arizona Attorney General, Arizona Secretary of State, Maricopa County, Texas District and County Attorneys Association, New Mexico County Clerks Association, Washington State Association of County Auditors, Tri-State (AZ, NM, UT) and Tri-County (Apache, Navajo, Coconino) Native American Language Election Information Conferences, Gila County's American Indian Voter Outreach Summit, the Navajo Nation, Hopi Tribe, and the Inter-Tribal Council of Nevada.

Bruce's Post-DOJ Redistricting Consultations include:

- Nevada Secretary of State –Comprehensive federal voting and election law consultation, including NVRA, Voting Rights Act, HAVA, and UOCAVA, redistricting, observation of federal primary election polling place practices in several Nevada counties, and best practices recommendations.
- Washington Secretary of State – Voting Rights Act Section 203 minority language requirements, application to redistricting, and coverage for State of Washington and local jurisdictions.
- Arizona Secretary of State – various provisions of the Voting Rights Act, including Section 11(b) voter intimidation, and Sections 5, 2, and 203 for redistricting.
- Arizona Governor and Arizona Department of Economic Security – NVRA Section 7 settlement with DOJ. Bruce conducted an in-house assessment and investigation and assisted Arizona in settlement negotiations with DOJ. The settlement is here: <https://www.justice.gov/crt/agreement-between-united-states-department-justice-and-arizona-department-economic-security>

- State of Arizona
- Gila County, Arizona
- Gila Community College, Arizona
- City of Globe, Arizona
- City of Phoenix, Arizona
- New York City, New York
- Allegan County, Michigan
- Navajo County, Arizona
- Yavapai County, Arizona
- Pinal County, Arizona
- Mohave County, Arizona
- Greenlee County, Arizona
- Graham County, Arizona
- La Paz County, Arizona
- Western Arizona Vocational Education District
- Ford County, Kansas
- Multiple confidential jurisdictions – states, counties, and municipalities

During the 2011 redistricting cycle, Bruce was the AIRC’s consulting expert in federal litigation challenging the Commission’s legislative redistricting plan before a three-judge federal court and on direct appeal to the U.S. Supreme Court.

The three-judge court upheld the Commission’s redistricting plan and endorsed Bruce’s advice to the Commission *Harris v. AIRC*, 993 F.Supp.2d 1042 (D. Ariz., 2014). In April 2016, a unanimous U.S. Supreme Court (136 S. Ct. 1301, 194 L. Ed. 2d 497 (2016)) agreed and upheld the plan’s legality 9-0.

In his post-DOJ career, all of Bruce’s Section 5 covered redistricting clients received DOJ Section 5 preclearance on first submission with no requests for additional information or other DOJ rejections. All court challenges to redistricting plans that Bruce prepared and/or analyzed were dismissed, such as the challenge to Arizona’s statewide legislative redistricting plan by a three-judge court and the U.S. Supreme Court. All of Bruce’s redistricting clients successfully implemented their redistricting plans. None of Bruce’s redistricting clients had any of their redistricting plans thrown out or enjoined by any courts.

We have extensive experience working with state and local governments, redistricting commissions, and elected officials at all levels of government across the United States.

Mr. Adelson is the only redistricting consultant or expert in the United States with both DOJ Voting Rights Act enforcement experience and redistricting consultant expertise endorsed by a unanimous U.S. Supreme Court, See: 136 S. Ct. 1301, 194 L. Ed. 2d 497 (2016).

Bruce has 21 years of successful redistricting experience, including DOJ enforcement, DOJ preclearance, litigation victories, and expertise creating, drafting, analyzing, and reviewing majority minority districts, minority emphasis districts, coalition districts, crossover districts, influence districts, as defined by the Voting Rights Act and the federal courts, and in enforcing requirements governing such districts during his federal service. Bruce successfully completed training exclusively conducted by the U.S. Department of Justice. This training is not publicly available and includes but is not limited to the Voting Rights Act of 1965 and Civil Rights Act of 1964.

During Bruce's DOJ career, Bruce reviewed and analyzed dozens of statewide and local redistricting plans throughout the United States for Voting Rights Act compliance. The Attorney General of the United States twice recognized Bruce's Voting Rights Act work, including redistricting, with "Special Achievement" Awards. In private practice, Bruce has a 100% perfect record of obtaining Voting Rights Act Section 5 preclearance on first submission for his clients without any DOJ requests for additional information or other DOJ imposed delays. Bruce's U.S. Supreme Court success in *Harris v. AIRC* reinforces and exemplifies his nationally recognized redistricting expertise.

Expert witness experience

Expert witness experience for Bruce Adelson includes and but is not limited to:

- *Harris v. Arizona Independent Redistricting Commission*, Case No 14-232, (136 S. Ct. 1301, 194 L. Ed. 2d 497 (2016)). Bruce Adelson was the Voting Rights Act expert for the Arizona Independent Redistricting Commission. He was the consulting expert in litigation challenging the Commission's legislative redistricting plan. A three-judge federal court dismissed plaintiffs' challenge to the plan. (*Harris v. Ariz. Indep. Redistricting Comm'n*, 993 F.Supp.2d 1042 (D. Ariz., 2014)). Mr. Adelson testified by deposition in that case. In April 2016, the U.S. Supreme Court unanimously upheld the plan's legality. In part, the Court held that when a state or local government draws a redistricting plan that keeps population deviations below 10%, the map is presumptively legal when "the population deviations were primarily a result of good-faith efforts to comply with the Voting Rights Act . . . even though partisanship played some role."
- *State v. Linda Jane Minyard and State v. Michael Edwin Minyard*, Maricopa County Superior Court CR 2016-002415-001 and CR 2016-002416-001. State of Arizona prosecuted the Minyards for felony voter fraud and voting in elections in two states. Bruce Adelson was the testifying voting and elections law and Department of Justice

expert for the Minyards. The case settled before trial. Defendants pleaded no contest to the lowest possible misdemeanors.

- Bruce was the undisclosed consulting expert for a State in a Voting Rights Act Section 2 vote dilution case where state law provided that a metropolitan charter cannot be adopted unless approved by both a majority of the qualified voters residing in the principal city in the county and a majority of the qualified voters residing outside the principal city in the county. This is referred to as the dual-majority voting requirement. In this case, the principal city has a majority Black population. The U.S. District Court granted summary judgment for the State.
- *Gray et al v. St. Louis City Board of Election Commissioners, (E.D. Mo., 2016)*. Bruce Adelson was the consulting expert for two blind voters who sued the St. Louis Board of Election Commissioners. The Court granted a Temporary Restraining Order that directed local election officials “make touch-screen voting machines with audio and all other accessible voting technology available for persons with disabilities during the absentee voting period for the November 8, 2016 election.” Recognizing the primacy of federal disability access law and blind voters' preference for touch-screen voting, the Court held that “... if disabled Missourians are denied the use of talking voting machines during the current absentee period, they will suffer irreparable harm in the form of a restriction on their fundamental voting rights.”
- *Nick, et al., v. City of Bethel, et al., Case No., 3:07-CV-00098-TMB, (D. Alaska)*. In 2008, Defendant State of Alaska designated Bruce Adelson as its testifying and consulting expert in this case where plaintiffs alleged violations of the Voting Rights Act's Section 203 minority language requirements for Alaska Native languages. Bruce assisted the State with enhancing its Section 203 program. The case settled before trial.
- *Hall v. State of Louisiana et al., 973 F.Supp.2d. 675 (M.D. La., 2013)*. Defendant State of Louisiana retained Bruce Adelson as an expert in redistricting and the Voting Rights Act. Mr. Adelson prepared an expert report. This case alleged Voting Rights Act Section 2 discrimination in how judges are elected to the Baton Rouge City Court. Trial in this case occurred in November 2014. Mr. Adelson testified at trial. In 2015, the Court found for the State of Louisiana, ruling in a case of first impression that election results from one election cycle are insufficient to prove Voting Rights Act Section 2 vote dilution. Bruce Adelson was the consulting expert for the State on appeal. In 2018, the U.S. Court of Appeals for the Fifth Circuit affirmed the trial court's decision.
- *Alissa Juech v. Children's Hospital of Wisconsin, 353 F.Supp.3d 773 (E.D. Wis. 2018)*, Children's Hospital's counsel retained Bruce Adelson as the testifying ADA expert. A deaf patient and her husband sued Children's Hospital alleging ADA disability discrimination by the hospital and staff. Bruce prepared an expert report. In 2018, the Court granted Children's Hospital's motion for summary judgment and dismissed the case.

- *Rose et al. v. Wayne County Airport Authority, 210 F.Supp.3d 870 (E.D. Mich. 2016)*
Bruce Adelson was the testifying Americans with Disabilities Act expert for the Wayne County Airport Authority and Detroit Metropolitan Airport. The case involved allegations of ADA and ADA Standards of Accessible Design (ADAAG) disability discrimination in the airport's main terminal, transit stops, and parking areas. In 2016, the court dismissed the lawsuit and the discrimination allegations against the airport, confirming the accuracy of Mr. Adelson's ADA expert opinions and ADAAG assessments. In 2017, the U.S. Court of Appeals for the Sixth Circuit affirmed and upheld the trial court's dismissal of this case.

4. Certification re Conflicts of Interest

I certify compliance with California Elections Code section 21551(d)(1). I certify that neither I nor my firm has done any California lobbying, engaged in any political activity in California, either paid or as a volunteer and will not do so during the pendency of a contract award.

I certify the following responses. We have never made and will not make during the pendency of a contract with the Commission any political contributions to any candidates, political parties, or causes in California and San Diego County. We have no legal or consulting clients in San Diego County. We have no matter in which we are presently adverse or potentially adverse to the Commission. In addition, there is no work previously provided by Bruce Adelson or my firm on behalf of any potential adverse party or witness, to the extent known.

We have never done nor will we do during contract pendency active volunteering for, consulting for, or service as paid staff for any candidate for public office or any public office holder in San Diego County.

5. Contracting and Fee Arrangements

I am prepared to execute a professional services agreement in the form attached to the RFQ as Exhibit 1, with exceptions/additions agreeable to the County of San Diego. I accept the terms of the professional services agreement and any proposed exceptions/ additions.

My fee estimate based on the description of the work contained in this RFQ is a not to exceed maximum fee of \$60,000.00 billable at the rate of \$425.00 per hour plus travel expenses for travel to San Diego County.

References:

Colleen Mathis, AIRC Chairwoman, 2011-2021



Ray Bladine, AIRC Executive Director, 2011-2021

[REDACTED]

Deborah Herbert
Mohave County Deputy County Attorney

[REDACTED]

Bruce Adelson consulted with Mohave County during the 2011 redistricting cycle and prepared the County's redistricting plans for the Board of Supervisors, justice of the peace districts, and community college districts, and Section 5 submission. The U.S. Department of Justice precleared all of the County's redistricting plans on first submission.

Gilda R. Daniels
Associate Professor of Law, University of Baltimore School of Law,

[REDACTED]

Thank you for your consideration and your interest in our expertise. Please let us know if you require any additional information.

Sincerely,

/s/

Bruce Adelson

CV for Bruce L. Adelson, Esq.

Bruce's areas of expertise include:

- Redistricting;
- U.S. Department of Justice;
- The Voting Rights Act of 1965;
- Help America Vote Act;
- National Voter Registration Act;
- Uniformed and Overseas Citizens Absentee Voting Act;
- Organizational culture;
- Diversity, bias, tolerance, and inclusion;
- Accessibility for people with disabilities and limited English proficiency;
- Cultural competence and awareness;
- Civil rights and discrimination;
- Professional and creative writing;
- College and professional school admissions and personal essays;
- Federal investigations, enforcement, and expectations;
- Federal grants;
- Americans with Disabilities Act;
- Rehabilitation Act of 1973;
- CLAS Standards;
- Joint Commission;
- Affordable Care Act;
- HIPAA;
- Civil Rights Act of 1964;
- Title IX of the Education Amendments of 1972; and
- Fair Housing Act

Federal Compliance Consulting's Bruce L. Adelson is a former Senior Trial Attorney and Attorney Advisor for the U.S. Department of Justice (DOJ), Civil Rights Division. Bruce's DOJ career spanned 2000-2006. Bruce founded Federal Compliance Consulting LLC in 2006. During his DOJ career, Bruce received Special Achievement Awards from the Department of Justice and Attorney General of the United States.

Bruce is a Faculty Member in the Department of Family Medicine at Georgetown University School of Medicine and an Adjunct Professor of Law at University of Pittsburgh School of Law. Mr. Adelson is a peer grant reviewer for the U.S. Department of Justice and ADA Consultant to the Idaho Supreme Court.

Bruce has provided federal voting rights, election law, redistricting, federal compliance, diversity, implicit bias, and cultural awareness consultation, training, and educational programs for states, counties, municipalities, colleges, universities, hospitals, clinics, physicians, nurses, educators, state courts, judges, law enforcement officers, and other organizations.

Bruce is the retained Voting Rights Act expert for the Arizona Independent Redistricting Commission and the consulting expert in *Harris v. Arizona Independent Redistricting Commission (U.S. Supreme Court, 2016)*.

Bruce has assisted with negotiating resolution and compliance agreements between organizations and the U.S. Department of Justice, U.S. Department of Health & Human Services, Federal Aviation Administration, and Federal Transit Administration.

At DOJ, Bruce shared responsibility for enacting federal policy. For example, Bruce approved for Federal Register publication the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons.

During his DOJ career, DOJ began its current polling place Americans with Disabilities Act (ADA) enforcement initiative. Bruce was involved in DOJ's first ADA polling place surveys and assessments in several counties and was involved in developing DOJ's original ADA polling place checklist to assess polling place compliance.

During his federal service, Bruce successfully completed training, available only to DOJ employees and conducted by the U.S. Department of Justice, including but not limited to the following:

- Voting Rights Act of 1965
- Federal voting and election law
- Evaluating structural accessibility pursuant to the ADA

At DOJ, Bruce was also responsible for federal law enforcement and training various state, city and county governments about federal civil rights laws and discrimination. He was also the Lead Attorney for DOJ's Civil Rights Division in New York City on 9/11.

Before his government service, Bruce L. Adelson was in private practice with a small law firm in Alexandria, Virginia, where he did primarily plaintiffs' complex civil litigation, including successful suits against three Roman Catholic Archdioceses for child sexual abuse by clergy including the first case in the nation where a court found liability under the theory of Clergy Malpractice.

Bruce was a Housing Attorney for Legal Services of Eastern Michigan, where he successfully litigated federal and state cases alleging violations of Michigan Landlord-Tenant law, the National Housing Act, and the U.S. Constitution.

Higher Education Teaching Experience

- Faculty Member: Georgetown University School of Medicine and University of Pittsburgh School of Law
- Guest Instructor/Lecturer: Auburn University, Harvard University, University of Baltimore School of Law, The Johns Hopkins University, and Cornell University
- Pre-law Advisor, University of Maryland and all Maryland state colleges and universities
- Writing Instructor, The Writing Center and the U.S. Department of Agriculture's Graduate School

Expert Testimony

In the last four years, Mr. Adelson testified at deposition in:

- *Harris v. Arizona Independent Redistricting Commission*, Case No 14-232, U.S. Supreme Court, 2016). Bruce Adelson was the Voting Rights Act expert for the Arizona Independent Redistricting Commission. He was the consulting expert in litigation challenging the Commission's legislative redistricting plan. A three-judge federal court dismissed plaintiffs' challenge to the plan. (*Harris v. Ariz. Indep. Redistricting Comm'n*, 993 F.Supp.2d 1042 (D. Ariz., 2014). Mr. Adelson testified by deposition in that case. In April 2016, the U.S. Supreme Court unanimously upheld the plan's legality. In part, the Court held that when a state or local government draws a redistricting plan that keeps population deviations below 10%, the map is presumptively legal when "the population deviations were primarily a result of good-faith efforts to comply with the Voting Rights Act . . . even though partisanship played some role."
- *Bied v. County of Rensselaer et al*, Case No. 1:15-CV-1011(TJM/DEP) (N.D. NY, 2016). Plaintiff's counsel retained Bruce as an accessibility and training expert in a case alleging disability discrimination in higher education. Bruce prepared an expert report and was deposed. The Court granted summary judgment to defendants on all counts except the count alleging federal disability discrimination, the area of Bruce's expertise. The case settled before trial

Cases where Bruce was retained as an expert but did not testify.

These cases include but are not limited to:

- *State v. Linda Jane Minyard and State v. Michael Edwin Minyard*, Maricopa County Superior Court CR 2016-002415-001 and CR 2016-002416-001. State of Arizona prosecuted the Minyards for felony voter fraud and voting in elections in two states. Bruce Adelson was the testifying voting and elections law and Department of Justice expert for the Minyards. The case settled before trial. Defendants pleaded no contest to the lowest relevant misdemeanors.
- *Alissa Juech v. Children's Hospital of Wisconsin*, 353 F.Supp.3d 773 (E.D. Wis. 2018), Children's Hospital's counsel retained Bruce Adelson as the testifying ADA expert. A deaf patient and her husband sued Children's Hospital alleging ADA disability discrimination by the hospital and staff. Bruce prepared an expert report. In 2018, the Court granted Children's Hospital's motion for summary judgment and dismissed the case.
- *Gray et al v. St. Louis City Board of Election Commissioners*, (E.D. Mo., 2016). Bruce Adelson was the consulting expert for two blind voters who sued the St. Louis Board of Election Commissioners. The Court granted a Temporary Restraining Order that directed local election officials "make touch-screen voting machines with audio and all other accessible voting technology available for persons with disabilities during the absentee voting period for the November 8, 2016 election." Recognizing the primacy of federal disability access law and blind voters' preference for touch-screen voting, the Court held that "... if disabled Missourians are denied the use of talking voting machines during the current absentee period, they will suffer irreparable harm in the form of a restriction on their fundamental voting rights."

The Court's decision confirms the importance of ensuring that the voting and election process is "accessible" to disabled voters under federal law.

- *Rose et al. v. Wayne County Airport Authority*, (E.D., Mich., 2016). Bruce Adelson is the testifying ADA expert for the Wayne County Airport Authority and Detroit Metropolitan Airport. Metro Airport is one of the busiest airports in the United States, with more than 32 million travelers passing through the airport last year. The case involved allegations of ADA and ADA Standards of Accessible Design (ADAAG) disability discrimination in the airport's main terminal, transit stops, and parking areas, with the airport alleged to violate the ADA's Standards of Accessible Design.

In late 2016, the court dismissed the lawsuit and the discrimination allegations against the airport, confirming the accuracy of Mr. Adelson's ADA expert opinions and ADAAG assessments. In a key part of the court's opinion, the U.S. District Court for the Eastern District of Michigan ruled that the "ADAAG requires a public entity[such as state or local government and hospitals] strictly to

comply with the ADAAG in the case of any new or altered construction, without regard to any subjective intent or motivation. Under this strict liability, a public entity must ensure that any new or altered facilities comply with the guidelines. If they do not, then they must be modified to conform.” In 2017, the U.S. Court of Appeals for the Sixth Circuit affirmed and upheld the trial court’s dismissal of this case.

- Collins v. Dartmouth-Hitchcock Medical Center and Dr. James Saunders, (D. N.H., 2015). Dartmouth-Hitchcock Medical Center’s counsel retained Bruce Adelson as an ADA expert. A patient and her family alleged disability discrimination by Dartmouth-Hitchcock Medical Center. Mr. Adelson prepared an expert report. On January 21, 2015, the Court granted Dartmouth-Hitchcock Medical Center’s motion for summary judgment and dismissed the case with prejudice.
- Harris et al., v. Wayne County Airport Authority, (E.D. Mich., 2015). Wayne County Airport Authority’s counsel retained Mr. Adelson as an ADA expert. The case involved allegations of ADA and ADAAG disability discrimination in the airport’s main terminal, transit stops, and parking areas, with the airport alleged to violate the ADA’s Standards of Accessible Design. Bruce Adelson prepared an expert report and affidavits. The case settled before trial. In July 2015, the court dismissed with prejudice plaintiffs’ attempt to reopen case and to find defendants liable for breaching the settlement agreement. On October 7, 2015, the Court granted the Airport Authority’s motion and dismissed the case with prejudice.
- Miller v. The Christ Hospital, (S.D. Ohio, 2017). The Christ Hospital’s counsel retained Bruce Adelson as an ADA expert. A deaf patient and her husband sued The Christ Hospital, alleging disability discrimination by The Christ Hospital and staff. Mr. Adelson prepared an expert report. The case settled before trial.
- Spiers v. NHE Realty Company LLC, Franklin Ave. Realty Co LLC and VIP Health Care Services, Case No. CV-14-2283 (E.D. NY, 2015). Plaintiff’s counsel retained Bruce Adelson as an accessibility expert. Plaintiff alleged Fair Housing Act disability discrimination by defendants. Mr. Adelson prepared an expert report. The case settled without trial.
- Nick, et al., v. City of Bethel, et al., Case No., 3:07-CV-00098-TMB, (D. Alaska). In 2008, Defendant State of Alaska designated Bruce Adelson as its testifying and consulting expert in this case where plaintiffs alleged violations of the Voting Rights Act’s Section 203 minority language requirements for Alaska Native languages. Bruce assisted the State with enhancing its Section 203 program. The case settled before trial.

Cases where Bruce Adelson was the retained expert but not publicly disclosed include but are not limited to the following:

- Bruce was the undisclosed consulting expert for a State in a Voting Rights Act Section 2 case where state law provided that a metropolitan charter cannot be adopted unless approved by both a majority of the qualified voters residing in the principal city in the county and a majority of the qualified voters residing outside the principal city in the county. This is referred to as the dual-majority voting requirement. In this case, the principal city has a major Black population. The U.S. District Court granted summary judgment for the State.
- Mr. Adelson was the consulting expert in a Voting Rights Act case against a State alleging that a method of election violated the Act's Section 2. The Court granted the State's motion for summary judgment and dismissed the case.

Public Speaking/Keynote Experience

Bruce has spoken at various forums as keynote and featured speaker on topics that include but are not limited to organizational culture, diversity, tolerance, cultural awareness, federal civil rights laws, voting rights and elections, federal investigations, communication with Limited English Proficient people and people with disabilities, language and disability access, Jim Crow, Baseball Integration and the Civil Rights Movement, and federal compliance including:

- The Johns Hopkins University School of Public Health;
- Georgetown University School of Medicine;
- Cornell University;
- University of Virginia;
- Auburn University;
- Harvard University;
- University of Baltimore School of Law;
- University of Minnesota;
- Michigan Translators/Interpreters Network;
- National Conference of State Legislatures;
- National Association of State Election Directors;
- National Association of County Recorders and Clerks;
- National Association of Counties;
- Washington Secretary of State;
- Colorado Secretary of State;
- Arizona Secretary of State;
- Nevada Secretary of State;
- Arizona Attorney General;
- Arizona State Bar;

- The Election Center;
- Texas District and County Attorneys Association;
- New Mexico County Clerks Association;
- Washington State Association of County Auditors;
- Nevada Administrative Office of the Courts;
- Nevada Courts of Limited Jurisdiction Conference;
- Tri-State (AZ, NM, UT) and Tri-County (Apache, Navajo, Coconino) Native American Language Election Information Conferences;
- Gila County's American Indian Voter Outreach Summit;
- Inter-Tribal Council of Nevada;
- Birmingham Civil Rights Institute;
- The National Archives;
- City of Flint;
- National Baseball Hall of Fame & Museum;
- National Association of Drug Court Professionals;
- National Association for Court Management;
- Arizona Legislature's Latino Caucus;
- International Municipal Lawyers Association;
- American Bar Association;
- City of Baltimore;
- City of Nashville;
- City of Houston;
- City of Loveland;
- City and County of Honolulu;
- Colorado Municipal League;
- Arizona League of Cities and Towns;
- State of Wisconsin;
- State of Arizona;
- State of Hawaii;
- Maryland Department of Transportation;
- Maryland Transit Administration;
- Wayne County Airport Authority - Detroit Metropolitan Airport;
- Columbus Regional Airport Authority;
- U.S. Department of Transportation;
- U.S. Department of Agriculture;
- New Mexico Administrative Office of the Courts;
- Hawaii Administrative Office of the Courts;
- Idaho Administrative Office of the Courts;
- Washington Administrative Office of the Courts;
- Nebraska Region V Health Care Systems;
- Indiana Judicial College - Indiana Supreme Court;
- California Administrative Office of the Courts;
- Kaiser Permanente;
- Sentara Health System;

- American Society for Health Care Risk Management;
- Memorial Hermann Health System;
- M.D. Anderson Cancer Center;
- Memorial Health System;
- Minnesota Hospital Consortium;
- Kaleida Health;
- Minnesota Department of Health Services;
- Greater Manchester Mental Health Center;
- Frederick Memorial Hospital;
- Johns Hopkins Hospital;
- Georgetown Medstar Hospital;
- George Washington Hospital;
- Moffitt Cancer Center;
- Northern Inyo Hospital;
- Resurrection Health Care;
- Advocate Christ Medical Center;
- Barton Health Care;
- VHA Southeast;
- Vizient Southeast;
- Baptist Hospital;
- Doctors Hospital at Renaissance
- New Hampshire Medical Interpreter Advisory Board;
- New York City's Interagency Task Force on Language Access;
- Michigan Refugee Resettlement Conference;
- Master Word Services, Inc.;
- CyraCom International, Inc.;
- Michigan Deaf and Hearing Impaired Services Inc.;
- Nebraska Association of Translators and Interpreters;
- Upper Midwest Translators and Interpreters Association;
- California Healthcare Interpreters Association;
- International Medical Interpreters Association;
- Texas Association of Healthcare Interpreters & Translators;
- Urban Court Symposium; and
- Maricopa County (Arizona) Superior Court

Selected titles of some of Bruce Adelson's online and in-person presentations include:

- "Is Your Website Legally Accessible?"
- "Just Do It – Culture, Diversity, & the Law;"

- The Case for CLAS & Cultural Awareness in Health Care;”
- “LGBT Discrimination – Where the Law is Right Now;”
- “Workplace National Origin Discrimination;”
- “Health Care Transgender Discrimination;”
- “Immigration, Cultural Awareness, & The Law: Challenges & Opportunities;”
- “Keeping it Legal - Federal Language, Cultural Competence, & Accessibility Requirements for Health Care Providers;”
- “Failure to Provide an Ounce of ADA Compliance is Worth a Pounding by the DOJ – A How To Guide for the Americans with Disabilities Act;”
- “80 lb. Pigs, Chairs & Effective Communications - Americans with Disabilities Act;”
- “Sneakers, Chinese Food, & Parking Spaces - Americans with Disabilities Act 2015 - The Year in Review;”
- “Keeping it Legal – An Introduction to Americans with Disability Act Requirements for Health Care Providers;”
- “The Case of the \$400,000 Sign Language Interpreter”
- “The Voting Rights Act of 1965 - Past, Present, and Future”
- “Voting & Elections - Life After *Shelby County*;”
- “Preparing for 2016 – What’s Happening in Federal Voting Law”
- “NCSL’s Capitol Forum Election Policy;” and
- “The Evolution of Election Administration since the Voting Rights Act 1965”

Publication and Media Experience

Bruce is the author of:

- *What You Need to Know to Comply With a Broader Americans with Disabilities Act;*
- *Title VI, Limited English Proficiency, and the Public Lawyer;*
- *Minority Language Election Rules and the Public Lawyer;* and

- *Bailout from the Voting Rights Act - A Reward for Complying with Federal Law* - all published by The American Bar Association.
- *Language-Based Discrimination and Title VI of the Civil Rights Act of 1964* - A Legal Compliance White Paper for the Health Care Industry, commissioned by CyraCom International, Inc.;
- *Title VI of the Civil Rights Act of 1964 - How an Effective Language Assistance Plan Can Lower Health Care Providers' Liability Risk* - A Legal Compliance White Paper for the Health Care Industry, commissioned by CyraCom International, Inc.;
- *Title VI of the Civil Rights Act of 1964 - A Compliance Primer for Health Care Providers* - published by Commerce Clearing House's Health Care Compliance Newsletter; and
- *Interpreting and the Law - An Introduction to Key Legal Issues Facing the Interpreting Profession* - published by Interpret America, LLC

Bruce is the published author of the following books for children and adults.

The Future of Election Administration – Cases and Conversations (Macmillan, 2019) – Chapter Author – “Accessibility Issues for Poll Sites and Voters”

Brushing Back Jim Crow -The Integration of Minor League Baseball in the American South (University of Virginia Press, 1999);

Benjamin Harrison (Lerner Publishing, 2006);

David Farragut - Union Admiral (Chelsea House, 2002);

George Gordon Meade - Union General (Chelsea House, 2002),

William Howe - British General (Chelsea House, 2002);

Baron von Steuben - American General (Chelsea House, 2002);

The Composite Guide to Field Hockey (Chelsea House, 2001);

The Composite Guide to Softball (Chelsea House, 2000);

Grand Slam Trivia, Hat Trick Trivia, Slam Dunk Trivia and Touchdown Trivia (Lerner Sports Trivia Series for Children, Lerner Publications, 1998);

The Minor League Baseball Book (Macmillan, 1995);

The Four Sport Stadium Guide (Random House, 1994), contributing editor

Bruce has been a commentator for National Public Radio and CBS Radio and a sports, legal affairs, and political reporter, with his works appearing in many publications, including: *The Atlanta Journal-Constitution*; *The Washington Post*; *Court Manager Magazine*; *Bureau of National Affairs (now Bloomberg/BNA News)*; *The Daily Record*; *Baseball America*; *Sport Magazine*; and *USA Today's Baseball Weekly*.

Bruce has been interviewed by various media as an expert about voting rights, language and disability access, diversity and inclusion, DOJ enforcement of federal civil rights laws and other federal compliance topics. Media include but are not limited to:

Battle Creek (MI) Inquirer
Columbus (OH) Dispatch
New York Times
Arizona Republic
Arizona Capitol Times
BBC
National Public Radio
Wolters-Kluwer Health Reform EDGE Wrap Up
Decision Health's Part B News Online
CCH's Health Care Compliance Letter

Bruce has authored myriad online postings and newsletters about diversity, inclusion, cultural awareness, DOJ enforcement of federal civil rights laws, federal language assistance and accessibility requirements and related topics.

Education and Professional Licenses

Bruce holds a BA in International Studies from The Johns Hopkins University and a JD from The University of Pittsburgh School of Law. He is licensed to practice law in the District of Columbia, Maryland, Michigan, and Virginia (inactive). He is licensed to practice before the U.S. District Courts for the Eastern and Western Districts of Michigan, the U.S. District Court for the Eastern District of Virginia, the U.S. Courts of Appeal for the Fourth and District of Columbia Circuits and the U.S. Supreme Court.

Bruce successfully completed training conducted by the U.S. Department of Justice. This training is not publicly available and includes but is not limited to the Americans with Disabilities Act, Voting Rights Act of 1965, and Civil Rights Act of 1964.