

The Honorable Robert S. Lasnik  
The Honorable David G. Estudillo  
The Honorable Lawrence Van Dyke

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

BENANCIO GARCIA III,

Plaintiffs,

v.

STEVEN HOBBS, in his official capacity  
as Secretary of State of Washington, and  
the STATE OF WASHINGTON,

Defendants,

NO. 3:22-cv-5152-RSL-DGE-LJCV

PLAINTIFF’S RESPONSE TO  
DEFENDANT STATE OF  
WASHINGTON’S MOTION FOR  
INQUIRY CONCERNING  
POTENTIAL CONFLICTS OF  
INTEREST

Plaintiff Garcia opposes this Motion for Inquiry Concerning Potential Conflict of Interest (“Inquiry Motion”), (*Garcia* Dkt. # 29)<sup>1</sup>, because there is no procedural basis allowing it, it is brought in a court that has no jurisdiction to hear it, and the motion has no factual basis to support it. Instead, the Motion is essentially a thinly-veiled attempt to sneak in through the back door that which the Court would not allow in through the front: namely, a prohibition on undersigned

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<sup>1</sup> Because *Palmer v. Hobbs*, No. 3:22-cv-5035-RSL, and *Garcia v. Hobbs*, No. 3:22-cv-05152-RSL-DGE-LJCV have been consolidated for purposes of discovery and trial, this Response cites to both dockets. Citations to the instant docket appear as “*Garcia* Dkt. # \_\_,” whereas cites to the *Palmer* docket appear as “*Palmer* Dkt. # \_\_.”

1 counsel representing clients who defend a Voting Rights Act (“VRA”) claim while  
2 simultaneously representing another client who pursues a Fourteenth Amendment claim against  
3 the same map. The *Palmer* Court has already rejected that argument. (*See Palmer* Dkt. # 69 at  
4 9–10.)

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6 Defendant State of Washington’s (“State’s”) Inquiry Motion is as lacking in merit as it  
7 is in procedural grounding. To quote the Bard, this Motion is “full of sound and fury, signifying  
8 nothing.” William Shakespeare, *Macbeth* act 5, sc. 5, l. 26–27. This is evident from the Motion’s  
9 own terms, as the Motion seeks not relief, but for the Court to “inquire” as to instant counsel’s  
10 communications and relationship with their clients. The attorney-client ethics rules were  
11 intended as a shield for clients, but here, the State attempts to use them as a sword to sever an  
12 attorney-client relationship, despite the fact that the clients do not seek such severance. This  
13 Court should roundly reject the State’s gamesmanship and deny the Motion.  
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15 Responding to a motion devoid of a procedural grounding is tricky business. However,  
16 the *Palmer* Intervenor-Defendants (“*Palmer* Intervenors”) and the *Garcia* Plaintiff (“Mr.  
17 Garcia”) are confident that the Court will see the State’s Inquiry Motion for what it is: over-the-  
18 top gamesmanship designed to disqualify and smear counsel on the eve of dispositive motion  
19 briefing deadlines. Such a tactic is designed not to serve the sanctity of the Court, nor to ensure  
20 the adequacy of representation, nor to adhere to the duty about which the State opines. Rather,  
21 the purpose of the State’s frivolous Inquiry Motion is to disadvantage the *Palmer* Intervenors  
22 and Mr. Garcia—with dispositive motion due dates for both cases just days away—in hopes that  
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1 it makes the State’s job easier.<sup>2</sup> For the reasons explained below, the Court should deny the  
 2 State’s Motion and take whatever steps the Court deems necessary regarding its actions.<sup>3</sup>

3 **I. There is No Procedural Basis for the State’s Inquiry Motion.**

4 Even if this Court has jurisdiction and the State has standing, there is no procedure upon  
 5 which the State may base an Inquiry Motion related to *potential conflicts* in a *civil* matter. Indeed,  
 6 undersigned counsel is not aware of a single case where the government has made an inquiry  
 7 motion in a civil matter for potential attorney conflicts.  
 8

9 Notably, inquiry motions are generally reserved for criminal matters. *See, e.g., United*  
 10 *States v. Razo-Quiroz*, No. 1:19-cr-00015-DAD-SAB, 2019 U.S. Dist. LEXIS 32410, at \*33  
 11 (E.D. Cal. Feb. 27, 2019) (allowing the filing of an inquiry motion regarding potential conflicts  
 12 *in a criminal matter* but denying a concurrent disqualification motion because any potential  
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14  
 15 <sup>2</sup> The State is undoubtedly in a tactical catch-22 between the *Garcia* and *Palmer* lawsuits. As discovery  
 16 has made clear, the Commission considered race when drawing the Legislative Map because some members  
 17 believed (without a strong basis) that doing so was necessary to comply with the VRA. So, if the State (with  
 18 undersigned counsel’s help) succeeds in defending against a Section 2 claim in *Palmer*—by showing that no  
 19 majority-minority district is required in LD 15—then the State has doomed its case in *Garcia*, where the State must  
 20 show (in opposition to undersigned counsel) that the boundaries of LD 15 were drawn without consideration of  
 21 race. The easiest solution for the State? Benefit from undersigned counsel’s already-provided help in *Palmer*, and  
 22 attempt to get undersigned counsel removed from both cases before their presence becomes a problem for the State  
 23 in *Garcia*. In short, the State must find a more meritorious method to defend the *Palmer* and *Garcia* suits.

24 <sup>3</sup> While a motion as frivolous as this does not warrant the time or effort of a separate motion for sanctions,  
 25 *Palmer* Intervenor-Defendants and Mr. Garcia note that the Court may issue such sanctions against the State and/or  
 26 its lead counsel Mr. Hughes should it so decide. *See, e.g., Perez v. Jie*, No. C13-877-RSL, 2014 U.S. Dist. LEXIS  
 45001, at \*7 (W.D. Wash. Mar. 31, 2014) (“Under its inherent power, a court may sanction an attorney or party  
 who has acted . . . in bad faith. . . .” (citing *Chambers v. NASCO, Inc.*, 501 U.S. 32, 45–46 (1991))); *Ortego v. Lummi*  
*Island Scenic Estates Cmty. Club, Inc.*, No. C14-1840-RSL, 2017 U.S. Dist. LEXIS 50645, at \*9 (W.D. Wash. Apr.  
 3, 2017) (“One facet of a federal court’s inherent power is that it may assess attorney’s fees when a party has ‘acted  
 in bad faith, vexatiously, wantonly, or for oppressive reasons.’” (citing *F.D. Rich Co., Inc. v. U.S. for Use of Indus.*  
*Lumber Co., Inc.*, 417 U.S. 116, 129 (1974))); *accord* LCR 11 (“An attorney or party who . . . presents to the court  
 unnecessary motions . . . or who otherwise so multiplies or obstructs the proceedings in a case may, in addition to  
 or in lieu of the sanctions and penalties provided elsewhere in these rules, be required by the court to satisfy  
 personally such excess costs and may be subject to such other sanctions as the court may deem appropriate.”).  
 Indeed, “[w]here disqualification motions are meritless and brought solely for tactical reasons, the Ninth Circuit has  
 upheld the award of costs and attorney’s fees as a sanction under Section 1927.” *United States Fire Ins. Co. v. Icicle*  
*Seafoods*, 523 F. Supp. 3d 1262, 1270 (W.D. Wash. 2021) (citing *Optyl Eyewear Fashion Int’l Corp. v. Style*  
*Companies, Ltd.*, 760 F.2d 1045, 1050 (9th Cir. 1985)).

1 conflicts had been waived); *United States v. Medina*, No. CR 06-00144-JSW, 2007 U.S. Dist.  
2 LEXIS 21156, at \*1–2 (N.D. Cal. Mar. 26, 2007) (same); *United States v. Wegers*, No. CR05-  
3 0231C, 2005 U.S. Dist. LEXIS 30856, at \*14–15 (W.D. Wash. Nov. 10, 2005) (same). If this  
4 were a criminal matter, the State could perhaps point to Fed. R. Crim. P. 44(c) as the basis for  
5 its Motion. *See Wegers*, 2005 U.S. Dist. LEXIS 30856, at \*3. However, this is a civil matter,  
6 which does not carry the same implications because there is no constitutional right to  
7 representation in a civil suit as there is with a criminal prosecution. *See United States v. W.*  
8 *Titanium, Inc.*, No. 08-cr-4229-JLS, 2010 U.S. Dist. LEXIS 79508, at \*38 (S.D. Cal. Aug. 6,  
9 2010) (“However, once alerted to even a potential conflict of interest, the Court has an  
10 independent duty to ensure that *criminal defendants* receive a trial that is fair and does not  
11 contravene the Sixth Amendment.” (emphasis added)). This is perhaps why the State is unable  
12 to cite a single procedural rule to serve as the basis for this *civil* Motion. (*See generally Garcia*  
13 *Dkt. # 29.*)

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16 Thus, the State’s filing of an inquiry motion about a potential conflict in a civil matter is  
17 an enigma. Indeed, in civil cases, inquiry motions are usually made to inquire about a docket or  
18 some aspect of a case’s status. *See, e.g., Klucka v. Ostrovsky*, No. 2:15-cv-1062-JCM (VCF),  
19 2015 U.S. Dist. LEXIS 91260, at \*1 (D. Nev. July 7, 2015) (“Plaintiff’s instant motion for  
20 inquiry does not ask for relief. Plaintiff merely asks for clarification from the court regarding the  
21 status of his case.”); *Gray v. Ryan*, No. CV-17-00963-PHX-GMS, 2019 U.S. Dist. LEXIS  
22 195846, at \*1 n.1 (D. Ariz. Nov. 12, 2019) (denying a petitioner’s “Motion for Inquiry of the  
23 General Docket,” whereby the “Petitioner request[ed] the status of his Third Amended  
24 Petition”); *Newton v. Nevada*, No. 2:16-cv-01824-KJD-GWF, 2017 U.S. Dist. LEXIS 25521, at  
25  
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1 \*1 n.1 (D. Nev. Feb. 21, 2017) (denying “Plaintiff’s inquiry [motion] about his financial  
2 certificates as moot”); *Silver v. Wolfson*, No. 2:18-cv-01106-JAD-CWH, 2019 U.S. Dist. LEXIS  
3 70121, at \*1 (D. Nev. Apr. 4, 2019) (“Presently before the court is plaintiff’s motion for  
4 inquiry . . . [on] the status of his *in forma pauperis application*, the court’s screening order, and  
5 his motion for permission for electronic case filing.”); *Hill v. Harper*, No. 2:20-cv-01655-KJD-  
6 DJA, 2021 U.S. Dist. LEXIS 230779, at \*6 (D. Nev. Dec. 2, 2021) (denying a plaintiff’s “motion  
7 of inquiry” that “appear[ed] to ask the Court . . . to send him a copy of Defendant’s response to  
8 Plaintiff’s [] motion”); *Patterson v. California*, No. 2:12-cv-2475-KJM-EFB P, 2014 U.S. Dist.  
9 LEXIS 28349, at \*42 (E.D. Cal. Mar. 4, 2014) (“[P]laintiff also filed a motion styled as a ‘motion  
10 of inquiry’ in which Patterson requests the status of his petition.”). However, instead of using  
11 this motion as a docket-monitoring mechanism, the State’s counsel attempts to use it for an  
12 advantage in litigation. *See infra* Part III.

15 What’s more, even when an inquiry motion on purported conflicts of interest is filed in  
16 a *criminal* matter, it is generally construed as a motion to disqualify. *See United States v. Rasco*,  
17 No. CR408-100, 2009 U.S. Dist. LEXIS 65246, at \*7 (S.D. Ga. July 29, 2009) (“Conveniently,  
18 courts have been faced with motions to disqualify mistakenly labeled as motions for inquiry  
19 before. Generally, the motions are construed as motions to disqualify.”); *see also United States*  
20 *v. Hanania*, 989 F. Supp. 1187, 1192 (M.D. Fla. 1997) (construing a “Notice of Conflict of  
21 Interest” and “Amended Notice of Conflict” as “a Motion to Disqualify Defendant’s Counsel,”  
22 which the court denied); *United States v. Collins*, No. 1:08-cr-47, 2008 U.S. Dist. LEXIS 39848,  
23 at \*1 (N.D. Ohio Apr. 21, 2008) (treating a notice “of a potential conflict involving Defendant’s  
24 counsel” as a motion to disqualify and denying it) (unpublished); *United States v. Evanson*, No.  
25  
26

1 2:05-cr-805-TC, 2006 U.S. Dist. LEXIS 76244, at \*1 (D. Utah Oct. 18, 2006) (construing motion  
 2 for inquiry as motion to disqualify). And, in this Circuit, such an inquiry motion is usually filed  
 3 with a corresponding motion to disqualify. *See, e.g., Razo-Quiroz*, 2019 U.S. Dist. LEXIS 32410,  
 4 at \*33; *Medina*, 2007 U.S. Dist. LEXIS 21156, at \*1–2; *Wegers*, 2005 U.S. Dist. LEXIS 30856,  
 5 at \*14–15.  
 6

7 Here, however, the State has not moved to disqualify counsel. Thus, to construe its  
 8 Inquiry Motion as a motion to disqualify would be inappropriate. *See Rasco*, 2009 U.S. Dist.  
 9 LEXIS 65246, at \*6 (“[T]he Court is not aware of any law allowing the Government to move  
 10 the Court for *sua sponte* action in a case where the disqualification is for the benefit of the  
 11 Government, and the Government has provided none.”). Crucially, here, the State contends that  
 12 it “does not take a position on whether disqualification is necessary or appropriate here.” (*Garcia*  
 13 Dkt. # 30 at 2.) Simply put, the Court should not construe the motion as asking for a remedy that  
 14 the state has not requested.  
 15

16 **II. The Court Lacks Jurisdiction to Hear the State’s Controversy-less Motion.**

17 As an initial matter, this Motion is procedurally defective as the State has not moved for  
 18 disqualification. Instead, the State invites this Court to appoint itself the arbiter of the attorney-  
 19 client relationship between undersigned counsel and his clients. Contrary to the State’s errant  
 20 belief, federal courts are not roving tribunals, musing over imagined ethical dilemmas or issuing  
 21 advisory opinions about what would happen if those hypotheticals were reality.  
 22

23 Article III of the U.S. Constitution limits the jurisdiction of federal courts to hear “Cases”  
 24 and “Controversies.” *See TransUnion LLC v. Ramirez*, 141 S. Ct. 2190, 2203 (2021); *Lujan v.*  
 25 *Defenders of Wildlife*, 504 U.S. 555, 559 (1992), thereby “confin[ing] the federal courts to a  
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1 properly judicial role,” *Spokeo, Inc. v. Robins*, 578 U.S. 330, 338 (2016). To demonstrate  
2 standing, the party invoking federal jurisdiction must prove that (1) it suffered an injury in fact,  
3 (2) the opposing party caused that injury, and (3) a favorable decision would be likely to redress  
4 that injury. *Lujan*, 504 U.S. at 560–61.

5  
6 However, “neither the United States Supreme Court nor the Ninth Circuit has addressed  
7 the particular question of whether the standing doctrine bars a nonclient party from moving to  
8 disqualify the opposing party’s counsel on the grounds of a conflict of interest.” *Icicle Seafoods*,  
9 523 F. Supp. 3d at 1269 (quoting *FMC Techs., Inc. v. Edwards*, 420 F. Supp. 2d 1153, 1156  
10 (W.D. Wash. 2006)) “[C]ourts in [the Western District of Washington] have found that the  
11 nonclient ‘must establish a personal stake in the motion to disqualify sufficient to satisfy the  
12 irreducible constitutional minimum of Article III.’” *Id.* (citation omitted). The State lacks such  
13 a personal stake here for two reasons.

14  
15 First, the State has *not moved for disqualification*. (See *Garcia* Dkt. # 30 at 2.) The entire  
16 inquiry centers around whether the opposing party has standing to *move to disqualify* opposing  
17 counsel. *Icicle Seafoods*, 523 F. Supp. 3d at 1269. However, the State *has not filed a*  
18 *disqualification motion*. Instead, it has moved for the Court to *inquire* about whether a *potential*  
19 conflict exists. Thus, the “merely ‘speculative’” nature of the State’s motion demonstrates that  
20 standing is lacking here. See *Lujan*, 504 U.S. at 561 (citation omitted). For all its bluster, the  
21 State’s Inquiry Motion is actually a request that this Court issue an advisory opinion, which the  
22 Court is constitutionally prohibited from doing. See *Flast v. Cohen*, 392 U.S. 83, 95 (1968).

23  
24 Second, the State has not been injured because no one has been injured. There is no un-  
25 waivable (or un-waived) conflict here. See *infra* Part III; see also *Icicle Seafoods*, 523 F. Supp.  
26

1 3d at 1269 n.3 (finding that “the record does not support a finding of conflict of interest” and  
 2 that the movant “fail[ed] to meet standing requirements in the first instance”). Undersigned  
 3 counsel’s clients have not filed an ethics complaint, raised an issue with this court, or expressed  
 4 displeasure with the underlying goals of the *Palmer* or *Garcia* litigation. In short, there is no  
 5 issue other than the one the State has conjured in its imagination.  
 6

7 In sum, the State has not been injured, and its motion presents no opportunity for  
 8 redressability but, instead, seeks an impermissible advisory opinion. Consequently, the State  
 9 lacks standing for the instant motion, and the Court should deny the State’s Motion for lack of  
 10 jurisdiction. *See Flast*, 392 U.S. at 95 (“[N]o justiciable controversy is presented . . . when the  
 11 parties are asking for an advisory opinion . . . and when there is no standing to maintain the  
 12 action.” (internal citations omitted)).  
 13

14 **III. Even if the Court has Jurisdiction, and the State’s Motion had a Procedural**  
 15 **Basis, the Inquiry Motion is Wholly Without Merit.**

16 As an initial matter, the State attempts a burden-bait-and-switch here. Although the State  
 17 has not moved for disqualification and avers that it takes no position on the appropriateness of  
 18 disqualification, (*Garcia* Dkt. # 30 at 2), it later contends that undersigned counsel here bears  
 19 the burden of demonstrating that disqualification is inappropriate, (*id.* at 8) (citing *Icicle*  
 20 *Seafoods, Inc.*, 523 F. Supp. 3d at 1268–69). Put differently, the State suggests that undersigned  
 21 counsel must disprove a motion that the State has not made. This contradictory suggestion alone  
 22 is sufficient to deny the State’s Motion, as it really seeks nothing but an advisory opinion.  
 23

24 Moreover, even if the State had moved for disqualification, the very case it cites  
 25 regarding the burden of proof indicates that the burden likely does not rest with the law firm  
 26 whose disqualification is sought. *See id.* at 1269 n.3 (indicating that the recent decision of the



1 Washington State Supreme Court in *Plein v. USAA Casualty Insurance Company*, 195 Wash. 2d  
 2 677, 687 (2020), raises concern “that federal district courts [have] misinterpreted Comment 6 to  
 3 ABA Model rule 1.9 in concluding that the burden rests with the firm whose disqualification is  
 4 sought” but declining to rule on whether the same is true of Rule 1.7 because there was no  
 5 conflict and the movant lacked standing). Indeed, such an interpretation would accord with other  
 6 jurisdictions where “[t]he party moving to disqualify counsel bears the burden of proving the  
 7 grounds for disqualification.” *In re BellSouth Corp.*, 334 F.3d 941, 961 (11th Cir. 2003)  
 8 (collecting cases from the Second, Fifth, and Eighth Circuits). Thus, if the burden rests with the  
 9 State, its speculative motion has come nowhere near meeting its burden because it does not  
 10 contend that there is an *actual* conflict, only a *potential* one. (*See generally Garcia* Dkt. # 30.)

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 13       Regardless, even if the burden rests with the non-movants here, they can easily meet it  
 14 should the Court order any inquiry.<sup>4</sup> First, this Court already rejected the State’s argument that  
 15 undersigned Counsel’s defense of a VRA claim against Washington’s Legislative Map conflicts  
 16 it from simultaneously pursuing a Fourteen Amendment claim against the same map. (*Palmer*  
 17 Dkt. # 69 at 9–10.) As the Court previously ruled when *Palmer* Intervenors filed their Motion to  
 18 Intervene, “the Court does not perceive an insurmountable conflict between the claims set forth  
 19 in *Garcia* . . . and intervenors’ opposition to plaintiffs’ Section 2 claim.” (*Id.* at 9.) Nothing of  
 20 substance has changed since that ruling other than the depths to which the State will descend to  
 21 prevent undersigned counsel from performing his duty to his clients.  
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<sup>4</sup> As the Motion before the Court is simply one to decide if the Court should convene an inquiry, it would be premature and inappropriate for *Palmer* Intervenors and Mr. Garcia to present evidence opposing an inquiry or motion for disqualification *that has not yet been filed*.

1 Indeed, in an attempt to breathe new life into this argument, the State misconstrues the  
 2 litigants' goals and testimony.<sup>5</sup> The *Palmer* Intervenors believe that the map should not be  
 3 redrawn because it does not dilute the votes of Hispanics in LD 15; but if it must be redrawn,  
 4 then it should be redrawn in a race-blind manner as not to be discriminatory. *Garcia* Plaintiff  
 5 believes that the map must be redrawn—without consideration of race—because race  
 6 predominated in the original drawing of LD 15. Both parties agree fundamentally that a race-  
 7 blind map is appropriate, which is what the Constitution demands in this and all instances.  
 8 Neither Ismael Campos, Alex Ybarra, Jose Trevino, or Benancio Garcia are attorneys or experts  
 9 in the nuances of redistricting law, nor is that required of them. Cherry-picked and misleading  
 10 questions and answers<sup>6</sup> provided in a deposition by a non-attorney regarding the intricacies of  
 11 redistricting law should be given little—if any—weight.<sup>7</sup> How can anyone expect a lay party to  
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15 <sup>5</sup> For example, the State contends that Mr. Trevino testified in his deposition that he did not believe the  
 16 map to be a racial gerrymander, (*Garcia* Dkt. # 30 at 9), but the terms “racial gerrymander” or “gerrymander” were  
 17 never used in Mr. Trevino’s deposition, (*see generally Palmer* Dkt. # 127–2), and the citation the State provides  
 18 does not suggest otherwise. The State similarly misleads when it contends that Mr. Ybarra does not want the  
 Legislative Map lines to change, (*Garcia* Dkt. # 30 at 4), as Mr. Ybarra’s deposition testimony was clearly more  
 equivocal than the absolute position presented by the State. (*See Palmer* Dkt. # 127-1 at 30.) Likewise, the State  
 portrays Mr. Garcia’s goals in a more absolute light than Mr. Garcia himself has done. (Exhibit A at 42:16–43:21.)

19 <sup>6</sup> For example, Plaintiffs’ counsel asked Mr. Garcia if he knew that Mr. Stokesbary, in his capacity as a  
 20 state legislator, “voted in favor of the plan that you are challenging.” (Exhibit A at 65:23–24.) As a lawyer  
 21 attempting to practice redistricting law in Washington, counsel knows (or should know) that such a question is  
 22 misleading at best. Under the Washington Constitution, the Commission passes the redistricting plan, and the state  
 legislature may *amend*—not approve—that plan. Wash. Const. Art. II, § 43(6). Notably, the legislature’s  
 amendment authority is limited, as it “may not include more than two percent of the population of any legislative  
 or congressional district.” Wash. Rev. Code Ann. § 44.05.100. Thus, as a matter of law, the Washington Legislature  
 23 does not vote to *approve* the Commission’s map but, instead, votes to *amend* it and only in a limited capacity.  
 Consequently, misleadingly framing the question as counsel being opposed to his client’s legal perspective—and  
 then asking how the client feels—is designed only to drive a wedge between counsel and client, and the State now  
 attempts (unsuccessfully) to drive that wedge further here.

24 <sup>7</sup> Indeed, Mr. Garcia himself admitted that he does not even have a “lay understanding” of redistricting  
 25 law. (Exhibit A at 24:19–25:1.) And Garcia, Campos, and Ybarra have admitted to getting the *Garcia* and *Palmer*  
 cases confused. (*See* Exhibit A 20:6–10; *Palmer* Dkt. # 127–1 at 14; Exhibit B at 45:10–47:7.) Moreover, if a lay  
 26 client’s lack of legal understanding about a case should serve as a basis for disqualifying counsel, it is notable that  
 the State has not made a similar motion regarding *Palmer* Plaintiffs, who also lack a strong legal understanding of  
 their case. (*See, e.g.,* Exhibit C at 14–15.)

1 understand the nuances of redistricting jurisprudence when such issues are regularly  
 2 misconstrued and debated in the highest courts of the land? *See, e.g., Merrill v. Milligan*, No.  
 3 21-1086, 142 S. Ct. 879 (U.S., Feb. 7, 2022) (Section 2 redistricting case presently pending in  
 4 the United States Supreme Court); *Covington v. North Carolina*, 316 F.R.D. 117, 166 (M.D.N.C.  
 5 2016) (citing *Miller v. Johnson*, 515 U.S. 900, 921 (1995), *aff'd North Carolina v. Covington*,  
 6 137 S. Ct. 2211 (2017) (discussing the effect of a redistricting map that was drawn predominantly  
 7 based on race, when the map drawers operated under the mistaken belief that the VRA required  
 8 a majority-minority district).

10 Second, the State makes similar misrepresentation about the *Palmer* Intervenors and Mr.  
 11 Garcia's knowledge about the litigation funding.<sup>8</sup> *Palmer* Intervenors and Mr. Garcia were  
 12 advised of, and consented to, the existence of the third-party payor in their respective litigations.  
 13 This financial arrangement has not adversely affected anyone's representation, and undersigned  
 14 counsel has at all times adequately represented their clients. At no point in either litigation have  
 15 any of undersigned counsel's clients claimed otherwise.

17 Third, as it relates to Mr. Garcia, a motion for inquiry based on an ongoing deposition is  
 18 premature at best. Mr. Garcia's deposition is set to continue at a future date. (*See Palmer* Dkt. #  
 19 153.) Premising a motion on testimony that has yet to conclude is flawed *ab initio*. The State's  
 20 action to the contrary has wasted the time and resources of the Court and the parties.

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24 <sup>8</sup> For example, the State contends that Mr. Campos does not know who is paying for this litigation. (*Garcia*  
 25 Dkt. # 30 at 10.) However, when asked, "[H]as anyone told you who is paying for the attorneys in this case," Mr.  
 26 Campos replied, "Not that I recall. *If they did, I didn't pay attention because it wasn't coming out of my pocket*. So  
 yeah, I guess it doesn't -- Yeah, I don't know." (Exhibit B at 84:25–85:15) (emphasis added). Mr. Garcia also  
 testified that he knew that a third party was paying for this suit and that—although he didn't know the name of the  
 entity during the deposition—he would discuss it later with his lawyer. (Exhibit A at 103:6–24)

1 In sum, to the extent the State brings up purported new information, it is—at best—a  
2 misconception of the facts. To the extent it raises previously rejected arguments, they should  
3 again be rejected. Undersigned counsel has more than met its burden—assuming arguendo that  
4 it is even their burden to bear—and the State cannot rebut it. Therefore, the Court should deny  
5 this motion.  
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7 **IV. Conclusion.**

8 For the forgoing reasons, the Court should dismiss the State’s Inquiry Motion as  
9 improvidently filed and take whatever other steps the Court deems necessary regarding the  
10 State’s conduct.  
11

12 DATED this 27th day of February, 2023.

13 /s/ Andrew R. Stokesbary  
14 Andrew R. Stokesbary, WSBA #46097  
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21 *Counsel for Intervenor-Defendants*  
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**DECLARATION OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court of the United States District Court for the Western District of Washington through the Court's CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 27th day of February, 2023.

Respectfully submitted,

/s/ Andrew R. Stokesbary

Andrew R. Stokesbary, WSBA #46097

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**CERTIFICATE OF COMPLIANCE**

The undersigned hereby certify that this Response contains 4,028 words and complies with LCR 7(e)(6).

Respectfully submitted,

/s/ Andrew R. Stokesbary

Andrew R. Stokesbary, WSBA #46097

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# EXHIBIT A

# Deposition of Benancio Garcia III

Garcia III v. Hobbs, et ano. / Palmer v. Hobbs, et al.

February 3, 2023



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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BENANCIO GARCIA III, )  
Plaintiff, )  
v. ) No. 3:22-cv-5152-RSL

STEVEN HOBBS, in his official )  
capacity as Secretary of State )  
of Washington, and STATE OF )  
WASHINGTON, )  
Defendants. )

and )

SUSAN SOTO PALMER, et al., )  
Plaintiffs, )  
v. ) No. 3:22-cv-5035

SECRETARY OF STATE STEVEN )  
HOBBS, in his official )  
capacity as Secretary of State )  
of Washington, et al. )  
Defendants. )

VIDEOCONFERENCE DEPOSITION UPON ORAL EXAMINATION OF

BENANCIO GARCIA III

Tacoma, Washington

(All participants appeared via videoconference.)

DATE TAKEN: FEBRUARY 3, 2023

REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

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1 DEPOSITION OF BENANCIO GARCIA III  
2 EXAMINATION INDEX

3 EXAMINATION BY:	PAGE
4 Mr. Hughes	5
5 Mr. Gaber	50
6 Mr. Hughes	105
7 Mr. Stokesbary	106

9 EXHIBIT INDEX	PAGE
10 EXHIBITS FOR IDENTIFICATION	
11 (No exhibits marked for identification.)	

1 TACOMA, WASHINGTON; FEBRUARY 3, 2023  
2 9:09 a.m.  
3 -o0o-  
4 BENANCIO GARCIA III, witness herein, having been  
5 first duly sworn on oath,  
6 was examined and testified  
7 as follows:

8 EXAMINATION

9 BY MR. HUGHES:

10 Q. Good morning, Mr. Garcia. I know we met just  
11 very briefly off the record, but I'm Andrew Hughes. I  
12 represent State of Washington in this matter.

13 Do you mind just stating your name for the  
14 record, please?

15 A. Yes. Benancio Garcia III.

16 Q. And what's your address, for the record?

17 A. Physical address?

18 Q. Yes, please.

19 A. 311 Birch Avenue, Grandview, Washington 98930.

20 Q. And that's in Yakima County?

21 A. Yes, it is.

22 Q. Have you recently moved?

23 A. Yes. It's still in Yakima County because I had  
24 a house fire. So I moved five times during that  
25 transition.

1 didn't -- I felt he didn't honor the deal, and then we  
2 ended up settling for --

3 Q. That was auto bodywork?

4 A. Yeah, auto bodywork.

5 Q. And about how long was -- go ahead. Sorry.

6 A. Oh, I can't recall exactly how long ago, but I  
7 was with the military at the time, and it was after I  
8 had just returned from Iraq.

9 Q. Okay.

10 A. And --

11 Q. I'd like to go over -- go ahead. Sorry.

12 A. -- the second time was, I took a -- a  
13 deposition done, and it was a private matter, and I  
14 settled the case.

15 Q. And about how long ago was that?

16 A. I'm sorry. I'm trying to recall. Maybe 2013,  
17 '15, somewhere.

18 Q. Okay. So it sounds like you've done this  
19 before, and probably know the rules, but I do want to  
20 just go over a few quick, you know, guidelines that will  
21 hopefully make this go as smoothly as possible.

22 You understand this is being recorded by a  
23 court reporter, so we need verbal answers.

24 That make sense?

25 A. Yes.

1 Q. Gosh. What was your most recent permanent  
2 address?

3 A. Oh, my goodness. I want to say -- I bel- --  
4 822 Olmstead Road, Grandview, Washington 98930.

5 Q. Okay. And I guess what I'm trying to ask is,  
6 what was the address of the house that burned down?

7 A. Oh, 311 Birch Avenue. It didn't completely  
8 burn down, but quite a bit of fire damage was done.

9 Q. Gosh. I'm sorry to hear that.

10 A. Thank you.

11 Q. And that's all in the legislative district --  
12 let me -- strike that.

13 You live in Legislative District 13 -- 15?

14 A. 15.

15 Q. 15. And you've lived there during the course  
16 of this moving because of the house fire?

17 A. Yes.

18 Q. Okay. Mr. Garcia, have you ever been deposed  
19 before?

20 A. Yes.

21 Q. Can you tell me about that?

22 A. I was de- -- I was deposed many years ago when  
23 I was with the military because of a business  
24 transaction where I needed to get bodywork done, and we  
25 had agreed upon a certain price, and we didn't -- he

1 Q. So no nodding, no shaking the head, etc.

2 And because there's a court reporter taking  
3 everything down, we can't talk over each other.

4 Understood?

5 A. Yes.

6 Q. So I'll try and wait until you're done speaking  
7 to ask my next question, and vice versa.

8 Does that work?

9 A. Yes.

10 Q. And you also understand that you're under oath  
11 here?

12 A. Yes.

13 Q. If I ask you a question and you don't  
14 understand it, can you please ask me to clarify that?

15 A. Yes.

16 Q. Okay. I just want to be sure that you  
17 understand the questions I'm asking, and that your  
18 answers actually go to the questions that I'm asking.  
19 Okay?

20 A. Yes.

21 Q. I don't anticipate we'll be here all that long,  
22 but if you do need a break at any time, you should feel  
23 free to ask for one. I'd just ask that, if there's a  
24 question pending, you answer that question before taking  
25 a break. Okay?

1 A. Yes.  
 2 **Q. Now, Mr. Garcia, is there any reason you can't**  
 3 **give full, accurate, and truthful testimony here today?**  
 4 A. No.  
 5 **Q. You're not sick or taking any medications or**  
 6 **anything like that, that affect your memory or your**  
 7 **cognitive function?**  
 8 A. No.  
 9 **Q. Okay. Your attorney might at some point object**  
 10 **to my questions. Those objections are mostly just for**  
 11 **the record. So unless Mr. Stokesbary tells you not to**  
 12 **answer, you still need to answer my question.**  
 13 **Does that make sense?**  
 14 A. Yes.  
 15 **Q. Okay. Mr. Garcia, what did you do to prepare**  
 16 **today for this deposition?**  
 17 A. I didn't prepare for this deposition.  
 18 **Q. You didn't have any meetings with Counsel?**  
 19 A. Well, we spoke about -- a little bit about me  
 20 showing up, and not so much showing up, but doing a  
 21 Zoom. But I was already here, so I really didn't have  
 22 much to say.  
 23 Most of my information came in, was through the  
 24 subpoena. So that's why I planned to be here and didn't  
 25 have a laptop and expected to be here at this location

1 **Q. And do you still work for the federal**  
 2 **government?**  
 3 A. No.  
 4 **Q. When did you stop working for the federal**  
 5 **government?**  
 6 A. In April of 2019.  
 7 **Q. So now you're just enjoying retirement?**  
 8 A. I ran for U.S. Congress. That's why I left the  
 9 federal government.  
 10 **Q. And what party did you run -- well, let me back**  
 11 **up.**  
 12 **Which congressional district did you run from?**  
 13 A. 4th Congressional District.  
 14 **Q. That's federal congress; correct?**  
 15 A. Correct.  
 16 **Q. And what party did you run as?**  
 17 A. Republican.  
 18 **Q. And why did you choose to run for congress,**  
 19 **Mr. Garcia?**  
 20 A. Because I believe in protecting our  
 21 constitution as it was written, and I've served in  
 22 combat to protect those rights, and I truly believe in  
 23 the American dream.  
 24 And I believe, in my life history, being Ebony  
 25 Senate rep in college, being part of LULAC, being part

1 that I feel awkward about.  
 2 **Q. Understood. I do apologize for that.**  
 3 **Did you speak with anyone besides**  
 4 **Mr. Stokesbary about this deposition?**  
 5 A. Yes. The attorney that's right here that I'm  
 6 using the office for because we were both confused.  
 7 **Q. Fair.**  
 8 **Did you review any documents in preparation for**  
 9 **this deposition?**  
 10 A. Other than what my attorney, Drew Stokesbary,  
 11 had -- we'd written in the Complaint versus Steve Hobbs.  
 12 **Q. Fair enough.**  
 13 **Mr. Garcia, what do you do for a living right**  
 14 **now?**  
 15 A. I'm retired military.  
 16 **Q. Okay. And what did you do before you retired**  
 17 **from the military? No. That was a -- that was a**  
 18 **foolish question.**  
 19 **How long were you in the military, Mr. Garcia?**  
 20 A. I was in the military from -- active duty  
 21 part -- 2003 to 2008.  
 22 **Q. And what did you do after you retired from the**  
 23 **military in 2008?**  
 24 A. I worked for a nonprofit, then worked for the  
 25 federal government.

1 of the Republican National Hispanic Assembly, I believe  
 2 that we should all have fair representation according to  
 3 our laws.  
 4 **Q. And what does that mean, "fair representation**  
 5 **according to our laws"?**  
 6 A. Fair representation meaning to me, like in our  
 7 4th Congressional District, we are largely a  
 8 Latino-based district, and it would only make sense that  
 9 leadership qualities in the sense of the district  
 10 population, that you would see a fair number of Latino  
 11 representation. But whether it's on the other side of  
 12 the mountains, if it's the Vietnamese district, or  
 13 Russian district, you would see fair representation.  
 14 **Q. Okay. And why did you feel like you were the**  
 15 **right person to represent the people in the 4th**  
 16 **Congressional District?**  
 17 A. I grew up there. I was born there. I  
 18 understand our culture there. We're a rural area. I've  
 19 been able to make a difference in approximately 1,000  
 20 households being homeowners when I worked for the  
 21 federal government.  
 22 So there are over 1,000 people, families, that  
 23 don't know I'm the reason why they're a homeowner. I've  
 24 done many, many non- -- hours, like with AmeriCorps.  
 25 I've worked in Granger High School. I am 51 years old,

1 and I have -- I always believe in a life of service.  
 2 And so my heart leads me to my desires, and that is to  
 3 make a difference for our community and our country, and  
 4 that's what I've been able to do in my -- my 51 years.

5 **Q. That sounds fantastic.**

6 **You mentioned -- I didn't get the name of it,**  
 7 **sorry, the Republican Hispanic -- some organization you**  
 8 **were part of?**

9 A. Yes. The Republican National Hispanic  
 10 Assembly.

11 **Q. And what is the Republican National -- oh, go**  
 12 **ahead. Sorry.**

13 A. I'm sorry. It was founded in 1967, and it was  
 14 to get more of the Latino population organized to help  
 15 them get registered to vote. And I truly believe it  
 16 doesn't matter which party it is, that registration for  
 17 every American is truly important. That's why I fought  
 18 for the rights for us to be free.

19 **Q. And you also mentioned being a member of LULAC.**  
 20 **What's LULAC?**

21 A. Yes, Legal United Latin American Citizens. I  
 22 was the secretary when it was founded, I want to say, in  
 23 2026 in Granger, Washington.

24 **Q. And why did you choose to be a part of LULAC?**

25 A. There are many unregistered voters, and I

1 wanted to be part of a Latino organization that has a  
 2 good history, and also be part of getting people  
 3 registered to vote. I strongly believe that our voting  
 4 rights are so critical to each American.

5 **Q. I think you touched on this a bit earlier, but**  
 6 **why is it important, in your view, that people be**  
 7 **represented by someone who shares their -- their life**  
 8 **experiences or understands their culture?**

9 MR. STOKESBARY: Objection as to form.

10 A. Well --

11 BY MR. HUGHES:

12 **Q. You can answer.**

13 A. Could you repeat the question one more time?

14 **Q. Yeah. I said -- I think you touched on this**  
 15 **earlier, but why is it so important that people be**  
 16 **represented by a representative who understands their**  
 17 **culture and shares their life experiences?**

18 A. I think it's important that when you share  
 19 cultural experiences, that you relate to them why it's  
 20 so important to vote. It's just having something in  
 21 common.

22 **Q. Mr. Garcia, how did you get involved in this**  
 23 **lawsuit?**

24 A. I got involved in this lawsuit by a phone call  
 25 from someone I'd known in the political realms and also

1 the fact of what was being stated on the redistricting  
 2 lines, you know, so it caught my attention. The Yakima  
 3 Herald one, and then another friend.

4 But when I realized the redistricting lines  
 5 were not of my personal -- I believe are based on  
 6 illegal gerrymandering and based on race, and I don't  
 7 agree with that.

8 **Q. Who was it who called you?**

9 A. I didn't know her very well. I met her at a --  
 10 a -- gosh. I'm trying to remember her name right now.  
 11 I -- I can't recall her name at this point. But I met  
 12 her at a political event with both parties. So it was  
 13 both parties event, both Democrats and Republicans in, I  
 14 want to say, the Bellevue area. So -- and what was  
 15 written, like I said, in the Yakima Herald.

16 **Q. So this person called you out of the blue,**  
 17 **looking for a plaintiff for this lawsuit; is that right?**

18 A. Well --

19 MR. STOKESBARY: Objection as to form.  
 20 BY MR. HUGHES:

21 **Q. You can answer, Mr. Garcia.**

22 A. You know, I must have made an impression.  
 23 That's all I can say because I had only met her once.  
 24 So I can't even say a friend, only because I -- I met  
 25 her once, so, you know...

1 **Q. I just want to be clear. Yes, this person**  
 2 **called you, recruiting a plaintiff for this lawsuit?**

3 A. Let me know about the situation, which was, you  
 4 know -- let me know about the situation and it may be  
 5 something I may want to be involved in. I'm trying to  
 6 recall the whole -- the conversation. It's been a  
 7 little while.

8 **Q. Do you recall what organization this person was**  
 9 **with?**

10 A. Actually, she had ran for the state position  
 11 for OSPI. I'm just forgetting her name.

12 **Q. Was it Maia Espinoza?**

13 A. That's correct.

14 **Q. So Ms. Espinoza reached out to you about**  
 15 **potentially serving as a -- a plaintiff in this lawsuit?**

16 A. Well, no. She didn't say personally, but she  
 17 said that I may be interested, and she didn't have much  
 18 details, but we had talked a little bit because I was  
 19 interested in her brochure that she had also.

20 **Q. What about her brochure?**

21 A. It was about getting people to vote.

22 **Q. And about when did Ms. Espinoza call you?**

23 A. I can't recall. It's been a little while.

24 **Q. Did you follow the redistricting process as it**  
 25 **was happening?**

1 A. I do.  
 2 **Q. Sorry. You do, or you did?**  
 3 A. No, I do.  
 4 **Q. So did you ever submit any comments to the**  
 5 **Redistricting Commission about any maps?**  
 6 MR. STOKESBARY: Objection as to form.  
 7 BY MR. HUGHES:  
 8 **Q. When Mr. Stokesbary says objection as to form,**  
 9 **you can still answer the question, Mr. Garcia.**  
 10 MR. STOKESBARY: Yeah. Sorry for the  
 11 confusion. The only time you don't need to answer, I  
 12 will make it very clear, and it will be when it involves  
 13 attorney-client privileged communication between us, but  
 14 otherwise I'll just say it for the record, and then you  
 15 can go ahead and answer anyway.  
 16 THE WITNESS: Thank you. Thank you, sir.  
 17 BY MR. HUGHES:  
 18 **Q. So let me back up and re-ask the question in**  
 19 **light of that interruption -- "interruption." I use the**  
 20 **term not pejoratively at all.**  
 21 **Mr. Garcia, did you ever submit any comments to**  
 22 **the Redistricting Commission?**  
 23 A. I don't know if I -- I don't recall if I did  
 24 submit comments. I know I have made comments about it.  
 25 **Q. To whom did you make comments about it?**

1 **doing, if any?**  
 2 A. From the Complaint that was sent, I was not  
 3 very pleased whatsoever.  
 4 **Q. What do you mean, "from the Complaint that was**  
 5 **sent"?**  
 6 A. That I filed, the lawsuit that I filed. It  
 7 also was attached, the redistricting zones that had  
 8 occurred throughout the process of the voting.  
 9 **Q. Mr. Garcia, did someone send you a Complaint**  
 10 **before you agreed to be a plaintiff in this lawsuit?**  
 11 A. No.  
 12 **Q. Okay. So you didn't see a Complaint until you**  
 13 **had agreed to be a plaintiff?**  
 14 A. I had already -- so repeat that again.  
 15 **Q. You did not see a Complaint in this matter**  
 16 **until you had agreed to become a plaintiff?**  
 17 A. Not from -- no, no.  
 18 **Q. You started saying "not from." Is there more**  
 19 **to --**  
 20 A. No, no. I'm sorry. I had -- I had not -- like  
 21 from -- the Complaint right now, why I am doing this  
 22 deposition, I was unaware of any other cases. So I  
 23 mean -- any other Complaints that were legal, you know,  
 24 brought against Steve Hobbs.  
 25 **Q. I guess I'm asking a different question.**

1 A. As I ran for congress. So I may give a speech  
 2 here and there.  
 3 **Q. I hear you. I'm asking about the period during**  
 4 **which the Redistricting Commission was doing their work,**  
 5 **so from about March of 2021 to November 15th of 2021.**  
 6 **Does that make sense?**  
 7 A. Yes. You would see it filed in my Complaint  
 8 with my lawyer.  
 9 **Q. So during the time in which the Redistricting**  
 10 **Commission was drafting the current legislative plan,**  
 11 **did you ever submit any comments through their website**  
 12 **or through email or anything like that?**  
 13 A. That I recall, no.  
 14 **Q. Did you ever propose any redistricting plans?**  
 15 A. I did not --  
 16 MR. STOKESBARY: Sorry. Same objection as  
 17 to form.  
 18 A. What you would see is my objections on the  
 19 Complaint that was filed.  
 20 BY MR. HUGHES:  
 21 **Q. Did you ever attend any meetings of the**  
 22 **Redistricting Commission?**  
 23 A. No.  
 24 **Q. During the time that the commission was doing**  
 25 **its work, what was your impression of the work they were**

1 **Did you see a copy of the Draft Complaint that**  
 2 **was filed in this matter before you agreed to become a**  
 3 **plaintiff in this matter?**  
 4 A. I saw a copy, yes, I did, of my Complaint, but  
 5 not of the one that we're doing the deposition on.  
 6 **Q. So to be clear, this deposition that I'm taking**  
 7 **right now is in the matter of Garcia v. Hobbs.**  
 8 **Do you understand that?**  
 9 A. Okay. No. I thought it was under the matter  
 10 of Susan Soto Palmer.  
 11 **Q. That's why typically an attorney would start a**  
 12 **deposition by showing you the dep notice, but, you know,**  
 13 **I play by my own rules.**  
 14 **So okay. Knowing now that we are --**  
 15 A. That's -- that's why I'm confused, when I'm  
 16 talking my Complaint, I know what my Complaint is, but I  
 17 have not seen anyone else's Complaint. I'm sorry.  
 18 **Q. Understood. No, no need to apologize.**  
 19 **So did you see the Complaint in the case that**  
 20 **became Garcia v. Hobbs before you agreed to become a**  
 21 **plaintiff?**  
 22 A. I seen -- I seen the Complaint first, yes.  
 23 **Q. And who sent you that Complaint?**  
 24 A. That was my lawyer.  
 25 **Q. Mr. Stokesbary?**

1 A. Yes.  
 2 **Q. Okay. When do you first recall seeing the**  
 3 **final maps proposed by the Redistricting Commission?**  
 4 A. You know, the final maps, once my Complaint was  
 5 put in, there was still quite a bit of -- as you can see  
 6 in the Yakima Herald, still a lot of issues on  
 7 determining when those maps were going to be completely  
 8 adjudicated through the State. So that, you know,  
 9 through the -- my election process, it -- it wasn't  
 10 until much later. My Complaint came first.  
 11 **Q. Had you seen the final maps then before you**  
 12 **filed your Complaint?**  
 13 A. They -- the -- the final maps that were  
 14 proposed, they -- they -- you know, I had seen the final  
 15 maps, I guess, would be yes.  
 16 **Q. So you had seen the final maps before you filed**  
 17 **your Complaint; is that -- I'm understanding?**  
 18 A. Yes. Because there was -- the representative  
 19 for 15th District was no longer going to be running at  
 20 that time, or moving to a new location.  
 21 **Q. And when do you recall seeing the final maps**  
 22 **for the first time?**  
 23 A. I want to say, oh, my goodness, in the summer  
 24 last year.  
 25 **Q. So the summer of 2022 was the first time you**

1 **saw the final maps?**  
 2 A. Yeah. The final maps, yeah.  
 3 **Q. What was your impression of those maps when you**  
 4 **saw them?**  
 5 A. I was not -- I was not pleased.  
 6 **Q. And why not?**  
 7 A. Because it was based on racial gerrymandering  
 8 on the legal district, in my opinion.  
 9 **Q. And what was the basis for your opinion?**  
 10 A. According to the other maps I had seen, it was  
 11 just based on racial gerrymandering, illegal  
 12 gerrymandering.  
 13 **Q. What makes you think the maps were racially**  
 14 **gerrymandered?**  
 15 A. They were drawn up very --  
 16 MR. STOKESBARY: Sorry. Objection to the  
 17 extent that calls for a legal conclusion.  
 18 BY MR. HUGHES:  
 19 **Q. You can answer.**  
 20 A. Well, let me -- give me one moment.  
 21 The maps cross over from re- -- recalling three  
 22 different counties. There is no particular freeway  
 23 boundary that's on there. They were very unusual than  
 24 any other map. Also the large population that was drawn  
 25 was basically Hispanic, and they didn't make sense to

1 me.  
 2 **Q. Mr. Garcia, I think I saw you open a binder or**  
 3 **flipping a binder while you answered that question.**  
 4 **What do you have in front of you right now?**  
 5 A. My Complaint.  
 6 **Q. Anything else?**  
 7 A. No.  
 8 **Q. Okay.**  
 9 A. My Complaint.  
 10 **Q. Fair. So --**  
 11 A. Oh, the subpoenas. The subpoenas. Because I  
 12 needed to know the location. So I just have the  
 13 subpoenas and my Complaint and my legal letter of  
 14 agreement with my attorney. That is all I have.  
 15 **Q. Understood.**  
 16 **So what about the shape of the district, the**  
 17 **lack of a freeway boundary, the things you just**  
 18 **mentioned, what about that indicated to you that this**  
 19 **was a racially gerrymandered district?**  
 20 A. Well --  
 21 MR. STOKESBARY: Objection to the extent  
 22 that calls for a legal conclusion.  
 23 A. Well, I have seen many maps in my lifetime.  
 24 I've done many home loans for the federal government.  
 25 I've been trained for community facilities for the

1 federal government. So I have to understand boundaries.  
 2 And sometimes, for whatever decision, congress can waive  
 3 this or that for that particular city to allow loans to  
 4 be done.  
 5 And to my familiarity of growing up here and my  
 6 work experience, it didn't make sense to me, other than  
 7 illegal racial gerrymandering, and that's just been my  
 8 lifetime experience of working ten-plus years for the  
 9 federal government and understanding community  
 10 facilities.  
 11 And I've had to be familiarized with SEPA, NEPA  
 12 environmental protection acts, also understanding  
 13 endangered species list, understanding local, federal  
 14 laws, and state laws on how they apply.  
 15 And when you have that type of experience, when  
 16 something looks wrong, and to me, racial gerrymandering  
 17 is in this presence, in my opinion.  
 18 BY MR. HUGHES:  
 19 **Q. Do you have an understanding -- you just**  
 20 **mentioned several laws there.**  
 21 **Do you have an understanding, even a lay**  
 22 **understanding, of any of the laws governing**  
 23 **redistricting in this state?**  
 24 A. I'm going to say no in -- in this state, other  
 25 than what I've read in Yakima Herald or -- or other

1 things, you know. So no.  
 2 **Q. And what have you read in the Yakima Herald or**  
 3 **other places that you just mentioned?**  
 4 A. I'm trying to recall, but obviously districts  
 5 or where you're going to go ahead and meet with people  
 6 are important to know, and the change of potential  
 7 represent- -- representation is critical to know.  
 8 And in this case, it seemed to be a very  
 9 drastic change, and I can say that with LULAC, bringing  
 10 up the Perry case in my Complaint seemed to fit that  
 11 description.  
 12 **Q. What specifically about the map do you -- looks**  
 13 **wrong to you? And when I -- when I say that, what I**  
 14 **mean is, are there any specific geographical quirks or**  
 15 **anything like that, that you think is only explicable by**  
 16 **race?**  
 17 A. Going through three counties is a little  
 18 different, and not really, like I said, you know,  
 19 hitting any particular landmark such as the Highway 82  
 20 or other things and drastically changing it, to me  
 21 that's -- there was a lot of racial gerrymandering that  
 22 occurred, personally, in my opinion.  
 23 **Q. Drastically changing it from what?**  
 24 A. To -- to making sure that -- that leadership  
 25 changed in -- in fair elections.

1 **Q. Mr. Garcia, I think I just heard you say that**  
 2 **the legislative district was drastically changed. And**  
 3 **what I'm asking is, drastically changed from what?**  
 4 A. Well, there's no land- -- particular landmark  
 5 in that case, or highway, like I said, 82. Look, most  
 6 of the district was in Yakima County, most of that  
 7 district on 15th, and it drastically changed to three  
 8 other counties. And it's very unusual.  
 9 And you can look at the Complaint. I mean, you  
 10 don't have to agree with it, but, you know, you can see  
 11 in the Complaint why -- you know, how it's drastically  
 12 changed. It's kind of hard to describe sometimes, but,  
 13 you know, it is there for everyone to see.  
 14 **Q. No, understood. I'm just trying to get a sense**  
 15 **of your understanding of the Complaint because this is**  
 16 **your lawsuit ultimately.**  
 17 A. Uh-huh. It is.  
 18 **Q. Mr. Garcia, do you know any of the**  
 19 **redistricting commissioners?**  
 20 A. Do I know any of the redistricting  
 21 commissioners? No, not -- not really. I mean, the ones  
 22 that determined -- I think there was seven of them.  
 23 **Q. Well, let me go to -- do you know Joe Fain?**  
 24 A. Not -- no.  
 25 **Q. Do you know Paul Graves?**

1 A. I have contacted him once before, twice before,  
 2 yes.  
 3 **Q. How do you know Paul Graves?**  
 4 A. Paul Graves. I was given a number that speaks  
 5 to Paul Graves on redistricting, and we had discussed it  
 6 for a few minutes on the redistricting.  
 7 **Q. And what did you discuss?**  
 8 A. I could say that we agreed that -- that the  
 9 redistricting seemed to be racial gerrymandering.  
 10 **Q. Can you -- do you remember anything else about**  
 11 **that discussion?**  
 12 A. No. It was very brief. It was very brief. I  
 13 mean, I don't recall everything. I don't recall the  
 14 conversation -- all the conversation. I'm just letting  
 15 you -- I don't recall the -- but it was a brief  
 16 conversation.  
 17 **Q. Was it a phone call? In person? Zoom?**  
 18 A. No, it was a phone call. Yeah, no, it was a  
 19 phone call.  
 20 **Q. And about when was that conversation?**  
 21 A. I want to say the winter -- early winter 2022,  
 22 possibly.  
 23 **Q. So approximately January, February 2022?**  
 24 A. It could be. You know, I -- I've had a lot of  
 25 phone calls, so I apologize.

1 **Q. Sure.**  
 2 A. Running for congress, I've spoken to a lot of  
 3 politicians on both ends.  
 4 **Q. I can't even imagine.**  
 5 A. So I know it was a brief conversation. And I  
 6 don't recall everything on that conversation, so I  
 7 apologize.  
 8 **Q. To your memory, who was it that first**  
 9 **suggested, in this phone call, that LD 15 was racial**  
 10 **gerrymandering? Was it you or Mr. Graves?**  
 11 A. I don't recall.  
 12 **Q. You recall, though, that you both agreed with**  
 13 **that?**  
 14 A. I do -- I do recall that, yes, the sentiments  
 15 were there. I mean, we didn't flat-out agree, but I had  
 16 looked more into -- into things at that point.  
 17 **Q. You didn't flat-out agree. What does that**  
 18 **mean?**  
 19 A. In other words, he didn't say clearly, oh, I  
 20 agree that this -- you know. But we were -- we were  
 21 talking in that perspective.  
 22 **Q. Do you remember what he did say?**  
 23 A. No, I don't.  
 24 **Q. And you said you were given a number to speak**  
 25 **with Mr. Graves. Who gave you the number?**

1 A. That would have been Maia.  
 2 **Q. Maia Espinoza?**  
 3 A. That's correct.  
 4 **Q. Okay. Would that have been in the first call**  
 5 **with her?**  
 6 A. I would assume so.  
 7 **Q. How many phone calls did you have with**  
 8 **Ms. Espinoza?**  
 9 A. I had a few because I wanted to get pamphlets  
 10 and talk about the pamphlets to hand out to people to  
 11 register to vote, what their rights are, civics. It was  
 12 a civics pamphlet.  
 13 **Q. So you had a few conversations in which --**  
 14 **strike that.**  
 15 **Did you have a few conversations in which this**  
 16 **litigation was discussed, or the possibility of --**  
 17 A. With her -- say that again?  
 18 **Q. Yeah. Did you have multiple conversations with**  
 19 **Ms. Espinoza in which you talked about a potential**  
 20 **racial gerrymandering lawsuit?**  
 21 A. No. No. We spoke about me wanting to see  
 22 about the civics, getting pamphlets, and we also spoke  
 23 about speaking to Paul. But, you know, that -- some of  
 24 the challenges to try to get a number of pamphlets, they  
 25 cost quite a -- you know, they cost money.

1 And unfortunately, I wasn't able to get my --  
 2 you know, get as many as I would have wanted to pass out  
 3 to people to vote, so -- we -- we live -- I haven't  
 4 spoken to her too much. It's been a long time.  
 5 **Q. So let me try and get the order of events here.**  
 6 A. Uh-huh.  
 7 **Q. So the first time this came up for you, a**  
 8 **potential racial gerrymandering lawsuit, was when Maia**  
 9 **Espinoza called you; correct?**  
 10 A. I had -- I had contacted her before, before the  
 11 civics pamphlets.  
 12 **Q. About a potential gerrymandering claim?**  
 13 A. No, no, no, no, no. I had contacted her  
 14 before, and she had been pretty politically busy.  
 15 But --  
 16 **Q. Understood.**  
 17 A. You know, we got to talking about that during  
 18 one of the phone conversations.  
 19 **Q. So, Mr. Garcia, again, what I'm trying to do**  
 20 **here is just connect the dots in how you got to become a**  
 21 **plaintiff in this lawsuit.**  
 22 **So I'm just asking about that for now. So the**  
 23 **first thing that happened was Maia Espinoza called you;**  
 24 **correct?**  
 25 A. Correct.

1 **Q. And she put you in touch with Paul Graves;**  
 2 **correct?**  
 3 A. Yes.  
 4 **Q. What happened after you talked to Paul Graves?**  
 5 A. I contacted -- I -- I went ahead and started  
 6 looking more into the redistricting. And so, you know,  
 7 it's, like I said, a change in leadership, from Jeremie  
 8 Dupree [sic], who was the 15th District congress -- I  
 9 mean, representative there, and I know Jeremie because  
 10 he's also military.  
 11 So I had a lot of concerns. And the fact that  
 12 the newspaper had stated that he would have to move if  
 13 he were going to go ahead and stay the representative  
 14 for the next election.  
 15 So I had looked -- I had been looking into what  
 16 was happening on 15th District, not only as my  
 17 representative, but I know Jeremie very -- I know  
 18 Jeremie. We served on the board together with the  
 19 Yakima County Veterans Coalition. And so, you know, I  
 20 was concerned about why these things were happening, you  
 21 know.  
 22 **Q. Understood.**  
 23 **And, Mr. Garcia, when you say Jeremie Dupree,**  
 24 **do you mean Jeremie Dufault?**  
 25 A. Dufault. I'm sorry. Jeremie Dufault. Sorry.

1 **Q. No worries.**  
 2 **When you said that you started looking into**  
 3 **this after you spoke with Paul Graves, what did you do**  
 4 **besides speaking with Mr. Dufault?**  
 5 A. Actually, I didn't speak with Mr. Dufault. I  
 6 know him because we -- like I said, we served on boards  
 7 together.  
 8 **Q. Okay.**  
 9 A. And I was concerned because I believe he's a  
 10 very good representative. Might not agree with  
 11 everything, but certainly a representative that I think  
 12 has good intentions.  
 13 **Q. Okay. So, Mr. Garcia, you were upset that**  
 14 **the --**  
 15 A. I wasn't upset. I was concerned.  
 16 **Q. Fair. You were concerned that the redrawn**  
 17 **LD 15 districted out Jeremie Dufault?**  
 18 A. Yes.  
 19 **Q. And is that part of why you were considering**  
 20 **bringing this lawsuit?**  
 21 A. The reason I brought this lawsuit, after  
 22 looking at things, and thinking about it, is, I do  
 23 believe it is based on racial gerrymandering. That is  
 24 the reason.  
 25 Irregardless if it was Jeremie that would maybe



1 lose the election, whoever it may be, I'm more concerned  
2 about the right thing happening than anything else.  
3 That is what I am concerned about.

4 And that is just my opinion, that it is -- this  
5 redistricting is very different than any other in the  
6 past, and that it's based on racial gerrymandering. And  
7 it is not something that's not too hard to believe. You  
8 know, you could research -- you know, I mean, the  
9 Complaint that we put on was an example of LULAC.

10 **Q. So after you spoke with Mr. Graves, you said**  
11 **you looked into matters, or I don't remember the exact**  
12 **language, but what did you do after you spoke with**  
13 **Mr. Graves, specifically, in consideration of bringing**  
14 **this lawsuit?**

15 A. Let me think about that. I believe I spoke to  
16 my attorney.

17 **Q. Did Mr. Graves give you Mr. Stokesbary's**  
18 **contact information?**

19 A. You know, I don't recall that, if he did.

20 **Q. Do you recall how you decided on -- or first**  
21 **reached out to Mr. Stokesbary?**

22 A. You know, I don't recall exactly how I ended up  
23 getting to speaking to my attorney. And like I said,  
24 you know, I had had a house fire. I made a lot of  
25 political phone calls.

1 I was concerned about, you know, civil rights  
2 and many other things. And so to be honest, at this  
3 moment, I can't say I recall how I got to Drew's number.  
4 But it wouldn't surprise me if I found it in research or  
5 maybe, you know, somebody had made a suggestion as I was  
6 doing political points, talking about why I'm running  
7 and whatnot. So to be honest, I can't exactly say I  
8 recall how I got to Drew's number.

9 **Q. Did you know Mr. Stokesbary before he was your**  
10 **lawyer?**

11 A. No.

12 **Q. Did you know who he was?**

13 A. I had heard of him because, when you're run --  
14 being -- challenging for U.S. Congress, other people  
15 have heard about him and wanted his endorsement. So,  
16 you know, I had known of him somewhat. But I couldn't  
17 quite put a picture -- a name to, you know, a face.

18 **Q. Had you read his Wikipedia page?**

19 A. No, actually, I hadn't. So I apologize.

20 **Q. So just to -- no need to apologize for that.**  
21 **Just to connect the dots fully then, so Maia**  
22 **Espinoza called you, suggested you call Paul Graves.**  
23 **You talked to Paul Graves. And then the next person you**  
24 **talked to about this was Drew Stokesbary? Is there**  
25 **anyone else you spoke to in consideration of bringing**

1 **this lawsuit, or in considering bringing this lawsuit?**

2 **Did you freeze, or am I frozen?**

3 MR. STOKESBARY: I think he might have  
4 frozen.

5 Benancio, are you there?

6 MR. HUGHES: Could we go off the record for  
7 a second?

8 (Pause in proceedings.)

9 BY MR. HUGHES:

10 **Q. So let me just re-ask the question, Mr. Garcia,**  
11 **before you froze.**

12 **So based on what you told me, it sounds like**  
13 **what happened was, Maia Espinoza called you, suggested**  
14 **you call Paul Graves. You then called Paul Graves, and**  
15 **the next person you talked to about this lawsuit was**  
16 **Drew Stokesbary. Is that right?**

17 A. Could very well be. Could very well be. Like  
18 I said, you know, I can't exactly recall because I was  
19 talking to a lot of people, paying attention to what was  
20 going on, and concerned about the re- -- the illegal  
21 racial gerrymandering redistricting that occurred.

22 **Q. Is there anyone else you spoke to about**  
23 **potentially bringing this lawsuit?**

24 A. You know what? I -- I did bring it up at times  
25 when I was campaigning, that I was the only candidate

1 that's currently running that is fighting the  
2 redistricting, yes. So there were many people,  
3 obviously, that -- that heard me say that.

4 **Q. Aside from some public statements, have you**  
5 **spoken with anyone in the Republican Party about this**  
6 **lawsuit?**

7 A. Well, a lot of those people were Republicans  
8 that I spoke to when I said those things.

9 **Q. Right. So I'm asking, aside from public**  
10 **statements, did you ever speak with any Republican**  
11 **officials, or, you know, Republican --**

12 A. Well --

13 **Q. -- staffers --**

14 A. -- to many -- I mean, look, as far as when I'm  
15 out there in the 4th District, you know, if it was  
16 Benton County Republican Party or whatnot, during the  
17 vetting system, I would have made it clear that I am the  
18 only candidate that's running -- and it was a general --  
19 it didn't get into detail or anything, but it was in  
20 generality of why I feel that I want to defend this.

21 So I mean, I spoke to a lot of people.

22 **Q. Do you know -- sorry.**

23 A. I spoke to a lot of people. A lot of people,  
24 you know, whether they be PCOs or whether they be  
25 chairmen at meetings and whatnot, I did bring it up,

1 yes.  
 2 **Q. Do you know Jim Troyer?**  
 3 A. No. I know a lot of people, but there's a lot  
 4 of people you meet. And to be honest, I probably don't  
 5 know him personally, but I might have ran into him as I  
 6 was campaigning. So I apologize.  
 7 **Q. Fair.**  
 8 **So, Mr. Garcia, I was asking you about the**  
 9 **commissioners and whether you'd spoken with any of them,**  
 10 **and I got about halfway through. So I want to return to**  
 11 **that.**  
 12 **Have you ever spoken -- do you know April Sims?**  
 13 A. Not that I am aware of.  
 14 **Q. Do you know Brady Piñero Walkinshaw?**  
 15 A. Not that I'm aware of. I'm recalling the  
 16 Yakima Herald's pictures of the commissioners on that,  
 17 and how they weren't able to meet the deadline that is  
 18 the RCW in order to go ahead and finalize the -- the  
 19 adjudication of the commission, of that district.  
 20 So I know they had certainly surfaced the time  
 21 limit in which the law gives them, and their pictures  
 22 were put out. So putting a face to a name, you know, on  
 23 any of them, I really couldn't. But did I read about  
 24 it? Yes.  
 25 **Q. But you never spoke with either Ms. Sims or**

1 **Q. Have you ever discussed redistricting with**  
 2 **Mr. Trevino?**  
 3 A. No.  
 4 **Q. Have you ever talked to him about any lawsuits?**  
 5 A. In regards to this?  
 6 **Q. Yeah.**  
 7 A. No. The last time I -- I actually -- I -- I --  
 8 yeah. I had dinner with Mr. Trevino and his wife. This  
 9 was at the Olive Garden about five years ago or so. But  
 10 I do know Jose.  
 11 **Q. That was the last time you met with him,**  
 12 **though?**  
 13 A. That I -- I would say met with him, but maybe  
 14 also at something at KDNA, which is in dis- -- where  
 15 he's the mayor at in Granger. You know, with maybe  
 16 LULAC or something like that, you know.  
 17 **Q. What's KDNA?**  
 18 A. That's the radio -- Latino radio station.  
 19 **Q. Okay.**  
 20 A. Yeah.  
 21 **Q. Do you know Alex Ybarra?**  
 22 A. I've met him, yes.  
 23 **Q. And how do you know Mr. Ybarra?**  
 24 A. The first time I knew about him was at the  
 25 event that Mr. Honeyford had mentioned, I believe that

1 **Mr. Walkinshaw?**  
 2 A. You know, I can't say I haven't, but Sims  
 3 sounds familiar. So Sims sounds familiar, but not --  
 4 not that I can recall. I mean, like I said, in passing,  
 5 because I also came up to this side of the mountains  
 6 often and spoke to a lot of people. So...  
 7 **Q. And for the record, this side of the mountains,**  
 8 **you're referring to the western side of the mountains**  
 9 **right now?**  
 10 A. Yes, the western side. Yes, yes, the western  
 11 side.  
 12 **Q. Do you know Sarah Augustine?**  
 13 A. Not -- not that I recall.  
 14 **Q. Okay. Do you know Jose Trevino?**  
 15 A. I do.  
 16 **Q. How do you know Mr. Trevino?**  
 17 A. I've known Mr. Trevino for a number of years.  
 18 He was --  
 19 **Q. How -- go ahead.**  
 20 A. Sorry.  
 21 **Q. Go ahead.**  
 22 A. Oh, he is from Sunnyside. I grew up in  
 23 Sunnyside. I know he was a police officer at one time.  
 24 And so I've known him a number of years, and he's also  
 25 the mayor of Granger.

1 was in Bellevue, where I met Maia. It was both -- it  
 2 was an open party event, so, you know, you had a lot of  
 3 Democrats, you had a lot of Republicans who were there,  
 4 and he was a guest speaker. And I heard him speak, and  
 5 I thought it was very nice.  
 6 **Q. And you met him after he spoke?**  
 7 A. I did. I shook hands with him. I was -- I was  
 8 very pleased to know that he was from the Ephrata area.  
 9 He's also state representative. And to hear his story  
 10 from others working in the fields to -- you know, his  
 11 parents, I could relate to that. And working for NASA,  
 12 and then coming back home to want to make a difference  
 13 in his community.  
 14 **Q. Have you ever discussed redistricting with**  
 15 **Representative Ybarra?**  
 16 A. No.  
 17 **Q. Do you know Ismael Campos?**  
 18 A. I believe so, yes. Campos family, yes.  
 19 **Q. How do you know Mr. Campos?**  
 20 A. If it's the same one I'm thinking about, he  
 21 used to be law enforcement.  
 22 **Q. I believe he also goes by Mel Campos, if**  
 23 **that --**  
 24 A. I'm sorry. Say again?  
 25 **Q. I believe he also goes by Mel Campos, if that**

1 **changes anything for you.**  
 2 A. I could be mixing him up with one of his  
 3 brothers, so I apologize if I am. There's a large  
 4 family, and -- you know, so I -- I am -- I'm sure I know  
 5 who you're talking about. He was former law enforcement  
 6 out of Wapato.  
 7 **Q. Have you ever discussed redistricting with**  
 8 **Mr. Campos?**  
 9 A. No.  
 10 **Q. Do you know his brother Pablo, or Paul, Campos?**  
 11 A. I know a few of his brothers, but the names  
 12 sometimes skip me, so...  
 13 **Q. I hear you.**  
 14 MR HUGHES: This would be a good time for me  
 15 to take a break, if it works for everyone else.  
 16 Do you want to take a break now?  
 17 THE WITNESS: That would be fine with me.  
 18 (Recess from 10:00 a.m. to 10:07 a.m.)  
 19 E X A M I N A T I O N (Continuing)  
 20 BY MR. HUGHES:  
 21 **Q. Mr. Garcia, welcome back.**  
 22 A. Thank you.  
 23 **Q. Do you believe that you were harmed by the**  
 24 **current boundaries of LD 15?**  
 25 A. Yes.

1 A. I want to change the map to where I feel that  
 2 it was probably -- its original, the way it originally  
 3 was, as I -- you know, as a voter. So hopefully it goes  
 4 back, but that will be up to the court system to decide  
 5 whether I'm right or wrong.  
 6 **Q. So, Mr. Garcia, is your goal in this lawsuit**  
 7 **then to have the map set back to the -- the map that was**  
 8 **in effect from 2012 to whenever this new map came into**  
 9 **effect?**  
 10 A. Well, the goal in my lawsuit is to determine  
 11 whether I am right in my beliefs that this was made  
 12 illegally through racial gerrymandering for a decision  
 13 to be made amongst my peers for the courts. That is my  
 14 goal. Because I strongly believe in protecting our  
 15 freedoms.  
 16 **Q. And if you are right, if the Court finds you**  
 17 **are right, what do you want to happen?**  
 18 A. Well, that we go through -- if the courts  
 19 have -- findings are that I am correct, then we go  
 20 through the process again to determine the map.  
 21 **Q. Understood.**  
 22 **Is there any -- never mind.**  
 23 **Mr. Garcia, do you know Nikki Torres?**  
 24 A. I do know her, yes.  
 25 **Q. How do you know her?**

1 **Q. And how?**  
 2 A. Due to the fact it's illegal gerry- -- racial  
 3 gerrymandering, that's how I'm harmed.  
 4 **Q. Okay. Can you say more about that?**  
 5 A. You know, I -- being part of LULAC, like I told  
 6 you, the United Latin American Citizens, we had gotten a  
 7 chapter there. I was familiar with at least knowing  
 8 that LULAC, which is the oldest Hispanic organization in  
 9 the country, had felt the same -- had the same feelings  
 10 I did when, you know, at that time they taken Perry,  
 11 Governor Perry, on a civil litigation -- civil  
 12 litigation, and defended the rights of American voters.  
 13 So I feel the same way in this case.  
 14 **Q. In this -- oh, sorry. Go ahead.**  
 15 A. I just feel the same way.  
 16 **Q. What's your goal in this lawsuit?**  
 17 A. The goal is to have it adjudicated to determine  
 18 to the people that, you know, if I'm right or wrong on  
 19 my beliefs, that this was done illegal ger- -- racial  
 20 gerrymandering, at least I did my due diligence, and  
 21 like I -- me protecting my country in combat, to me  
 22 protecting my rights -- voting rights.  
 23 **Q. Do you want to change the map?**  
 24 A. Yes.  
 25 **Q. How?**

1 A. Well, running through the campaign. So you  
 2 meet a lot of people, you know. So I met her in  
 3 Tri-Cities when I was campaigning, at a parade.  
 4 **Q. And Ms. Torres is your state senator now?**  
 5 A. Yes.  
 6 **Q. Okay. So I will do her the honor of calling**  
 7 **her Senator Torres then.**  
 8 A. Okay.  
 9 **Q. Do you like Senator Torres?**  
 10 A. Well, she was fine to me, so we met. I don't  
 11 know her personally, but she seemed like a nice person,  
 12 so...  
 13 **Q. Well, I won't ask you how you voted because I**  
 14 **think that's probably private, but do you like having**  
 15 **Senator Torres as your state rep- -- state senator?**  
 16 A. You know, Ms. Torres, I am fine with. She  
 17 seems nice.  
 18 **Q. Do you want Ms. Torres to keep representing**  
 19 **you?**  
 20 A. Well, I will say no.  
 21 **Q. Why is that?**  
 22 A. Because I believe the redistricting was illegal  
 23 gerrymandering. It's not on the individual themselves.  
 24 It is the fact that I believe it was racially illegally  
 25 gerrymandered. That's my problem.

1 It's got nothing to do with any personal  
 2 representative, has nothing to do with the fact if  
 3 Jeremie Dufault is no longer so much the representative.  
 4 It's the fact that, in my core beliefs, I strongly  
 5 believe in following our constitution, and I -- and I  
 6 strongly believe in defending those rights. So it's got  
 7 nothing to do personally with anyone.

8 **Q. Understood.**

9 **I want to switch gears just a little bit. You**  
 10 **said you're aware of the Soto Palmer v. Hobbs case;**  
 11 **correct?**

12 A. Yes. When I got served the papers, and I mean  
 13 by that is, I just read where I had to be, so I -- you  
 14 know, so that's what I mean.

15 **Q. Do you have any understanding of what the**  
 16 **Soto Palmer v. Hobbs case is about?**

17 A. No.

18 **Q. You haven't read any news articles about it?**

19 A. No.

20 **Q. Okay. I asked you earlier about Jose Trevino,**  
 21 **Alex Ybarra, and Ismael Campos, and you recall that**  
 22 **discussion?**

23 A. Yes, I do.

24 **Q. Are you aware that Messrs. Trevino, Ybarra, and**  
 25 **Trevino have intervned as defendants in the Soto Palmer**

1 no question.

2 MR. STOKESBARY: Well, I -- Andrew, I  
 3 thought the question said, did you discuss with your  
 4 lawyer. That sort of is the -- the --

5 MR. HUGHES: No. No. Let me do the  
 6 question again. I apologize if I misspoke.

7 BY MR. HUGHES:

8 **Q. Mr. Garcia, did you ever agree that you would**  
 9 **dismiss your lawsuit if Messrs. Trevino, Ybarra, and**  
 10 **Campos were allowed to bring racial gerrymandering**  
 11 **claims in Soto Palmer v. Hobbs?**

12 A. No.

13 **Q. Okay. I'm going to show you --**

14 A. I --

15 **Q. Oh, go ahead. Sorry.**

16 A. No. I brought this lawsuit on the fact that --  
 17 that I believe that there was racial gerrymandering  
 18 occurring, and that I would see this all the way  
 19 through.

20 **Q. That's important to you, that you -- you are**  
 21 **going to see this lawsuit all the way through?**

22 A. As important as it was for me to run for U.S.  
 23 Congress because I believe I will do what is the best  
 24 interests of 4th District. It's as important to me that  
 25 when I signed on to this lawsuit, that I would see to

1 **litigation?**

2 A. I'm aware in the sense that I was served the  
 3 paperwork, but I -- I didn't look into -- I mean, I --  
 4 all I looked at basically is where I had to be, and the  
 5 time of the deposition was going to be. I didn't look  
 6 into anything more than that.

7 **Q. So you said you were not aware of the**  
 8 **Soto Palmer litigation until you got your subpoena;**  
 9 **correct?**

10 A. That's correct.

11 **Q. And when did you get your subpoena?**

12 A. Last week.

13 **Q. Okay. So the last week of January?**

14 A. Yes.

15 **Q. Did you ever agree that you would dismiss your**  
 16 **lawsuit if Messrs. Trevino, Ybarra, and Campos were**  
 17 **allowed to bring racial gerrymandering claims in the**  
 18 **Soto Palmer case?**

19 MR. STOKESBARY: I'm going to object to the  
 20 extent this calls for attorney-client communication, and  
 21 instruct you not to answer that question, Ben.

22 MR. HUGHES: I'm going to have to push back  
 23 on that, Drew. I don't know how him making a decision  
 24 about whether he would dismiss his lawsuit is  
 25 necessarily attorney-client privileged. It's a yes or

1 the end what would occur. There's no wavering on my  
 2 completion of this.

3 **Q. Understood.**

4 **I'm going to show you a document real quick.**  
 5 **Let me make sure I have the right one before I share my**  
 6 **screen.**

7 A. I'm sorry. I only have cell phone, and my  
 8 glasses are having difficulty viewing the document.

9 **Q. Okay. Do you see a document on the screen**  
 10 **right now?**

11 A. Yes, I do. Well, it went off the screen.

12 **Q. My Zoom quit unexpectedly. Let me try this one**  
 13 **more time.**

14 **Okay. Can you see a document on my screen,**  
 15 **Mr. Garcia?**

16 A. Yes, I do.

17 **Q. Are you able to read it?**

18 A. Yes. The defendants, Jose, Ismael, and Alex  
 19 Ybarra.

20 **Q. And you see it says, "Intervenor Defendants'**  
 21 **Opposition to Plaintiffs' Motion to Bifurcate and**  
 22 **Transfer, Strike, and/or Dismiss Intervenor's**  
 23 **Crossclaim"?**

24 A. I do see that.

25 **Q. Have you ever seen this document before?**

1 A. I saw this document. It was served when I got  
 2 my subpoena.  
 3 **Q. This particular document was served with your**  
 4 **subpoena?**  
 5 A. Let me see. It might not be. Not that  
 6 particular document, no.  
 7 **Q. Okay. So you've never seen this document**  
 8 **before then?**  
 9 A. No.  
 10 **Q. Okay. I want to scroll down to Page 4. Do you**  
 11 **see -- well, let me -- hang on. Let me -- do you see**  
 12 **here -- this is actually Page 7 -- that this is signed**  
 13 **by Andrew Stokesbary?**  
 14 A. Correct.  
 15 **Q. That's your lawyer in this case?**  
 16 A. That's correct.  
 17 **Q. And it says here that Mr. Stokesbary also**  
 18 **represents intervenor defendants?**  
 19 A. Yes.  
 20 **Q. So you understand that he represents the**  
 21 **intervenor defendants in the Soto Palmer case?**  
 22 A. Well, obviously he put it in writing, yes, that  
 23 he is.  
 24 **Q. Okay. So I want to look at Page 4 then of this**  
 25 **document.**

1 A. Uh-huh.  
 2 **Q. And it says -- do you see where I'm**  
 3 **highlighting? "Intervenors' counsel represents that**  
 4 **Garcia will be voluntarily dismissed once it is clear**  
 5 **that this Court will allow Intervenors' Fourth Amendment**  
 6 **Crossclaim to proceed in this case"?**  
 7 **Do you see that?**  
 8 A. Could you highlight that again?  
 9 **Q. Uh-huh.**  
 10 A. I'm trying to read it. I'm sorry. It's off a  
 11 cell phone and -- that is new news to me.  
 12 **Q. You never agreed to this?**  
 13 A. I will never agree to not be part -- I agreed  
 14 that I would finish this all the way through to --  
 15 **Q. So this representation was made without your**  
 16 **authorization then?**  
 17 A. Yes.  
 18 MR. HUGHES: Okay. That's all I have. I'll  
 19 stop screen sharing. And, Mark, the witness is yours.  
 20 MR. GABER: Thank you.  
 21 EXAMINATION  
 22 BY MR. GABER:  
 23 **Q. Mr. Garcia, it's nice to meet you. My name is**  
 24 **Mark Gaber. I represent the plaintiffs in the**  
 25 **Soto Palmer case, and so we sent you the subpoena. And**

1 **I just want to, again, apologize for the**  
 2 **misunderstanding that you were under the impression you**  
 3 **needed to travel from your home. You could have done**  
 4 **this today from any computer anywhere.**  
 5 **So I do thank you for traveling, and hope at**  
 6 **least you've had a nice visit. And I believe you're in**  
 7 **Tacoma; is that right?**  
 8 A. Yes.  
 9 **Q. And so I just want to -- I'll try not to repeat**  
 10 **anything that Mr. Hughes asked you, but it's always hard**  
 11 **when there's two people taking a deposition like this,**  
 12 **so if I do repeat anything, I apologize.**  
 13 **So I just wanted to clarify. I know you said**  
 14 **that you've moved a couple times. Where do you**  
 15 **currently reside?**  
 16 A. 311 Birch Avenue, Grandview, Washington 98930.  
 17 **Q. And is that your home that had the fire?**  
 18 A. Yes.  
 19 **Q. Has the -- have the fire damage been**  
 20 **remediated?**  
 21 A. About 90 percent, somewhere around there.  
 22 **Q. And do you intend to remain a resident there?**  
 23 A. Yes.  
 24 **Q. Now, you mentioned that you had a conversation**  
 25 **with Paul Graves.**

1 **Had you known Paul before that conversation?**  
 2 A. No, not that I'm aware of.  
 3 **Q. And what do you know about Mr. Graves'**  
 4 **involvement as -- or his work as a commissioner, as a**  
 5 **redistricting commissioner?**  
 6 A. Other than he's a commissioner, that's --  
 7 that's it. I mean, there wasn't much discussion.  
 8 **Q. Did you know that Mr. Graves and his staff were**  
 9 **responsible for drawing District 15 in the adopted plan?**  
 10 A. I am aware of that.  
 11 **Q. Did it strike you as unusual that he was**  
 12 **contacting you to discuss that the plan he had drawn was**  
 13 **a racial gerrymander?**  
 14 A. Well, he didn't contact me. I contacted him.  
 15 **Q. Your understanding was that he was expecting**  
 16 **your phone call; is that right?**  
 17 A. Well, I don't know if he was expecting my phone  
 18 call. It's been a little while, so I can't recall the  
 19 whole thing. I know that Maia had given me his number.  
 20 **Q. Okay.**  
 21 A. So it's been a little while, so I apologize for  
 22 that.  
 23 **Q. But he had a conversation with you, and you**  
 24 **took away from it that he was sympathetic to what you**  
 25 **were expressing, that you thought there was a problem**

1 that District 15 was a racial gerrymander; is that -- am  
2 I understanding that correctly?

3 A. Yes.

4 Q. And at the time, did you talk with him about  
5 the fact that he was heavily involved in drawing  
6 District 15?

7 A. Well, obviously he was heavily involved in  
8 drawing, but I know that the committee certainly did not  
9 go into complete agreement. There was a lot of issues  
10 on that for -- and you could look at the newspaper and  
11 you could see that they had passed the deadline, which  
12 was state law, in which they were supposed to  
13 adjudicate, to where it actually went to the courts.

14 Q. Are you aware that Mr. Graves has testified in  
15 this litigation that he was involved in lighting the  
16 fire for your lawsuit?

17 MR. HUGHES: Object. Misstates the  
18 evidence, misstates Mr. Graves' testimony.

19 A. I'm sorry. Say again? I didn't hear that  
20 question.

21 BY MR. GABER:

22 Q. Are you aware that Mr. Graves has testified  
23 that he helped light the fire for your lawsuit?

24 MR. HUGHES: Objection. Misstates  
25 Mr. Graves' testimony.

1 BY MR. GABER:

2 Q. Yeah. Do you know why Ms. Espinoza suggested  
3 that you call Mr. Graves?

4 A. I believe that -- that she was concerned about  
5 the redistricting.

6 Q. What was the purpose of calling Mr. Graves? I  
7 mean, you had a five-minute conversation with him.  
8 Did -- do you under- -- do you have any understanding as  
9 to what was to come of that conversation?

10 A. You know what? No. Because she was -- Maia  
11 was very brief about it, and I mean very brief. And  
12 like I said, you know, I thought the initial  
13 conversation was going to be about the -- the books,  
14 pamphlets that she had for civics that I was interested  
15 in, because I called her, but I knew she was busy  
16 because she had ran for state representative for OSPI,  
17 public school -- office of school instructions. So, you  
18 know, I knew that. I was hoping she would give me a  
19 call back, and I was hoping to get a box of those  
20 pamphlets, you know.

21 Q. And I don't remember if you were asked this, so  
22 I apologize if I'm repeating something.

23 How did you first get in touch with  
24 Mr. Stokesbary? Did you call him or did he contact you?

25 A. No, I think it would have been -- I think --

1 A. No, I didn't know Mr. Graves had taken, you  
2 know -- had done a deposition. The same thing that, you  
3 know -- for example, a misunderstanding, being here in  
4 Tacoma today, when I didn't have to be here. So, you  
5 know, obviously there's not much communication until the  
6 last minute. So...

7 BY MR. GABER:

8 Q. But do you understand that Mr. Graves,  
9 nevertheless, thinks that the plan is not, in fact, a  
10 racial gerrymander?

11 A. He has a right to his own opinion. So I -- I  
12 don't know what -- what he -- what he -- what he said  
13 under his deposition.

14 Q. Was it your impression, from your phone call  
15 with him, that he wanted you to file a lawsuit?

16 A. I -- I won't say that that was the impression,  
17 that he -- that he wanted me to file. But I was under  
18 the impression that he wasn't content with the  
19 redistricting. That was just my -- from -- from -- you  
20 know, we spoke probably about five minutes or so.

21 Q. Do you know why Ms. Espinoza asked you to call  
22 him?

23 MR. STOKESBARY: Objection as to form.

24 A. Could you repeat that question again?

25 ///

1 well, I shouldn't say "I think," but I probably called  
2 him, but I don't remember the mechanism of how because,  
3 you know -- or who gave me the number or whatever the  
4 case was. That, I don't recall.

5 I mean, I spoke to a lot of people. I'm very  
6 passionate about civil rights. And, you know, I had so  
7 many things going on other than a political -- running  
8 for congress, you know, dealing with moving five  
9 locations, basically, during this whole process. So I  
10 had a lot of things happening at one time. So I  
11 can't --

12 Q. And just to clarify on the conversation with  
13 Mr. Graves, was that after the map was already in place,  
14 after the State Supreme Court had said, okay, that's the  
15 map?

16 A. No. That -- that was before, you know, before  
17 it went to -- way before.

18 Q. Okay.

19 A. My -- yeah, that was way before. We're talking  
20 in the wintertime.

21 Q. And --

22 A. And so --

23 Q. Go ahead.

24 A. Sorry.

25 Q. Winter of -- so just to put a -- be more

1 **specific, what -- generally what month and year?**  
 2 A. Before my Complaint was filed. It was months  
 3 before that.  
 4 **Q. Would that have been in 2021 or 2022?**  
 5 A. The Complaint was filed --  
 6 **Q. I think the Complaint was in the springtime of**  
 7 **2021, March maybe?**  
 8 A. Oh, it would have been in the wintertime.  
 9 Yeah. It was before the Complaint.  
 10 **Q. But it was -- am I correct that it was after**  
 11 **the November time period of 2021 when the commission**  
 12 **approved the map, or approved the concept of the map?**  
 13 A. Probably. I would say yes, yeah.  
 14 **Q. Okay. Who are all of your attorneys in this**  
 15 **case?**  
 16 A. You know, be honest, I just know Drew has been  
 17 my primary contact. And I met one of the -- well,  
 18 didn't meet, but over the phone spoke with my attorney,  
 19 and I apologize for not knowing his name offhand, but my  
 20 glasses are a little fuzzy. I should have gone with my  
 21 old-school glasses. So I can't read what's in front of  
 22 me right now.  
 23 **Q. Okay.**  
 24 A. I should just take them off. So I apologize.  
 25 **Q. So do you know how many attorneys you have in**

1 **Q. Does Dallin Holt ring a bell?**  
 2 A. Yes.  
 3 **Q. Okay. Is that one of the -- is that who you**  
 4 **spoke to?**  
 5 A. I believe so, yes.  
 6 **Q. And do you understand that he has associates**  
 7 **who are -- that work with him as well? Is that right?**  
 8 A. That is correct.  
 9 **Q. And they became your attorneys, as you**  
 10 **understand it, yesterday; is that right?**  
 11 A. That, and Drew remains my attorney, yes.  
 12 **Q. Now, you talked a little bit with Mr. Hughes**  
 13 **about this, but do you understand that your attorneys**  
 14 **also represent three individuals who have intervened as**  
 15 **defendants in the Soto Palmer lawsuit?**  
 16 A. Yes. That was news to me that -- that --  
 17 about -- about that, that -- at this point. Yes, this  
 18 was just brought up. Yes.  
 19 **Q. And when you say that was news to you, you mean**  
 20 **during Mr. Hughes' questions of you, that's when you**  
 21 **first learned that your attorneys also represented**  
 22 **intervenor defendants in the Soto Palmer lawsuit?**  
 23 A. Yes. That's also news to me.  
 24 **Q. Are you aware of the relief that -- or the**  
 25 **outcome that the intervenor defendants, who your counsel**

1 **this case?**  
 2 A. No.  
 3 **Q. At some point have there been attorneys other**  
 4 **than Mr. Stokesbary who represent you?**  
 5 A. Yes. I spoke with my attorney yesterday.  
 6 **Q. Okay. And how did that come to be?**  
 7 A. I believe it was through Drew. So my primary  
 8 attorney had given me notice, I believe, that another  
 9 attorney would be talking to me specifically.  
 10 **Q. But you don't -- you can't recall their names?**  
 11 A. I've got it on my phone, but I'm using that  
 12 right now for --  
 13 **Q. Sure. And I don't want to -- it isn't a trick**  
 14 **question. Is it the law firm of Holtzman Vogel?**  
 15 A. It -- you know, I don't want to say yes or no  
 16 because I just got his name basically yesterday. I  
 17 believe it was yesterday or day before.  
 18 **Q. Okay.**  
 19 A. I'm just not -- I'm not sure of his name, and I  
 20 apologize because I'm sure he's on here, so my sincere  
 21 apologies. I can't use my cell phone to -- to take a  
 22 look at his name, and my glasses, they're brand-new, and  
 23 I just realized right now that I can't use them to read.  
 24 **Q. They're useless to you.**  
 25 A. Yeah. They're useless to me, so --

1 **represent in the Soto Palmer lawsuit, are you aware of**  
 2 **the -- what they are asking the Court to do in the**  
 3 **litigation?**  
 4 A. I wasn't aware until it was brought up to me  
 5 today that if the case were to move forward, that the  
 6 intervening defendants -- or intervening Jose, Alex, and  
 7 Mr. Campos would be the ones moving forward on the case  
 8 and I would be withdrawn from the case. Is that  
 9 correct?  
 10 **Q. Well, that was the representation that was made**  
 11 **by your counsel to the Court, so that is correct.**  
 12 **How does that make you feel?**  
 13 A. I got to be honest. I made it clear that, if I  
 14 started this, I was going to finish to the end, and I am  
 15 not pleased.  
 16 **Q. And you're not pleased to be learning that for**  
 17 **the first time in this deposition; is that right?**  
 18 A. Absolutely correct.  
 19 **Q. Are you aware that the intervenor defendants,**  
 20 **in particular Mr. Ybarra and Mr. Trevino, have testified**  
 21 **in depositions in this litigation that it's their desire**  
 22 **that the map remain unchanged?**  
 23 A. I was unaware of that.  
 24 **Q. The first time you're learning that is when I**  
 25 **just told you that in my question?**

1 A. Yes.  
 2 **Q. And are you aware -- or strike that.**  
 3 **Now, I understand, from your conversation with**  
 4 **Mr. Hughes, that -- am I right that you -- you want the**  
 5 **map to be changed?**  
 6 A. That is correct, what I stated, yes.  
 7 **Q. And so this is the first time you're learning**  
 8 **that your attorneys are both representing intervenors in**  
 9 **the Soto Palmer case, asking that the map not be**  
 10 **changed, and also representing you at the same time,**  
 11 **where you want the map to be changed?**  
 12 A. Yes.  
 13 **Q. Do you see a problem with that?**  
 14 A. Yes, I do.  
 15 **Q. And what is that?**  
 16 A. There are conflicting reasons why the Complaint  
 17 was filed on initially why I filed it and to know that,  
 18 if this case were to be moved forward, the intervening  
 19 witnesses, or defendants, however you want to --  
 20 plaintiffs, would go ahead and see the Complaint in a  
 21 different light, opposite to what was initially filed,  
 22 and that I would not see this to fruition, to completion  
 23 of adjudication.  
 24 **Q. So the problem is both that -- that your**  
 25 **counsel was saying they would dismiss your lawsuit**

1 **without your authorization --**  
 2 A. Uh-huh.  
 3 **Q. -- but also it's a problem that they have**  
 4 **clients whose interests are opposite to yours; is that**  
 5 **correct?**  
 6 A. That's correct.  
 7 **Q. And I assume it was your expectation that your**  
 8 **counsel would be representing your point of view**  
 9 **exclusively; correct?**  
 10 A. That is correct, and under our legal  
 11 representation agreement.  
 12 **Q. And so your -- your written agreement with your**  
 13 **counsel provides that they will represent your interests**  
 14 **and your desires, and not be in conflict with that?**  
 15 A. At free cost through the duration of this  
 16 Complaint.  
 17 **Q. And you agree with the statement I made as**  
 18 **well?**  
 19 MR. STOKESBARY: Hey, I'm sorry, Mark. I  
 20 couldn't find my mute button in time, but I'm going to  
 21 object to the extent you are asking about privileged  
 22 communications between me and Mr. Garcia. And, Ben, I'm  
 23 going to ask you -- no, it's okay. I'm going to ask you  
 24 not to answer questions about our engagement agreement.  
 25 THE WITNESS: Hello?

1 MR. GABER: Yeah. I'm sorry. I'm just  
 2 taking a moment to think.  
 3 THE WITNESS: I didn't know if something  
 4 went wrong again, so I apologize.  
 5 MR. GABER: No, your side's working good.  
 6 THE WITNESS: Am I able to get a copy of  
 7 this deposition very soon?  
 8 MR. GABER: The one that you're taking right  
 9 now?  
 10 THE WITNESS: Yes.  
 11 MR. GABER: Yeah, you'll get a copy, and  
 12 your counsel will be able to order a rush copy too, if  
 13 you'd like, which would be quicker than the normal  
 14 course.  
 15 THE WITNESS: Okay.  
 16 BY MR. GABER:  
 17 **Q. So have you talked to Mr. Ybarra at all about**  
 18 **the -- what he would like to have happen to the map or**  
 19 **anything about the redistricting plan?**  
 20 A. No.  
 21 **Q. And what about Mr. Trevino?**  
 22 A. No.  
 23 **Q. And Ismael Campos?**  
 24 A. No.  
 25 **Q. And just so I understand, did you speak to**

1 **anyone at the Holtzman Vogel law firm, other than Dallin**  
 2 **Holt?**  
 3 A. Not that I'm aware of. I don't think so.  
 4 **Q. Did you speak with Mr. Jason Torchinsky?**  
 5 A. I don't think so. I mean, like I said, I --  
 6 the communication was -- you know, there's -- no, not  
 7 that I'm aware of.  
 8 **Q. And what about Phil Gordon?**  
 9 A. No.  
 10 **Q. And, Mr. Garcia, do you have a copy of your**  
 11 **engagement letter there with you for today's deposition?**  
 12 A. The subpoena?  
 13 **Q. No. Your -- your retainer agreement with your**  
 14 **lawyer.**  
 15 A. Oh, do I have a copy of my -- my retainer  
 16 agreement? Yes, I do.  
 17 **Q. And that's -- that's there with you for today's**  
 18 **deposition?**  
 19 A. The agreement for legal representation? Yes.  
 20 **Q. Yes.**  
 21 A. Yes.  
 22 MR. STOKESBARY: Yeah, again, I'm going to  
 23 object to the extent this calls for privileged  
 24 attorney-client communication and, Mr. Garcia, ask you  
 25 not to discuss our engagement agreement.



1 BY MR. GABER:  
 2 **Q. And my question, Mr. Garcia, is just that it's**  
 3 **there with you. You brought it with you to the**  
 4 **deposition; is that right?**  
 5 MR. STOKESBARY: You can answer that  
 6 question, Ben.  
 7 A. Oh, yes.  
 8 BY MR. GABER:  
 9 **Q. And have you reviewed that during the course of**  
 10 **the deposition?**  
 11 A. No. Because my glasses -- and I apologize. I  
 12 just got these from the VA, so I assume they were --  
 13 there wasn't a problem with them, but --  
 14 **Q. My uncle has had the same problem with his VA**  
 15 **glasses, so I understand.**  
 16 A. I'm having a little bit of problem.  
 17 Everything's a little fuzzy on the reading.  
 18 **Q. Mr. Garcia, are you aware that Mr. Stokesbary**  
 19 **serves in the legislature?**  
 20 A. That, I didn't know, no.  
 21 **Q. You did not know that?**  
 22 A. No, I did not know that.  
 23 **Q. So I gather you're not aware that he voted in**  
 24 **favor of the plan that you are challenging?**  
 25 A. No, I was unaware of that.

1 **Q. But as you sit here today, I gather you're**  
 2 **pretty concerned about the situation?**  
 3 A. Yes.  
 4 **Q. Okay. I want to shift gears a little bit and**  
 5 **talk a little bit about your experience running as a**  
 6 **candidate in the area and your campaign and your**  
 7 **familiarity with the area, if that's okay with you.**  
 8 **So you ran for congress in 2022; is that right?**  
 9 A. That is correct.  
 10 **Q. And was that your first time running for**  
 11 **office?**  
 12 A. Yes.  
 13 **Q. And how did you decide to get involved in that**  
 14 **race?**  
 15 A. I had helped a candidate, a fellow Republican,  
 16 in 2016, and we got to the primary, and I felt that  
 17 representation was -- was not there in -- in all  
 18 manners.  
 19 And I wanted to reach out to as many people as  
 20 possible, and to put my -- the reason why I felt I was  
 21 the best candidate to go ahead and represent the 4th  
 22 Congressional District.  
 23 So I got an idea from, like I said, another  
 24 candidate who was involved in the race quite a bit, and  
 25 seeing how the process went, so I could learn, if I were

1 **Q. How does that make you feel?**  
 2 MR. STOKESBARY: Sorry. Once again, slow on  
 3 the mute button, but objection that it misstates the  
 4 evidence.  
 5 BY MR. GABER:  
 6 **Q. And you can go ahead and answer.**  
 7 A. Not very good.  
 8 **Q. And you cut out a little bit. Not -- did you**  
 9 **say not very good?**  
 10 A. Not very good.  
 11 **Q. Why is that?**  
 12 A. The Complaint that was filed, I would assume  
 13 that my attorney would be in line of -- of my support.  
 14 **Q. And to make it clear, this is the first time**  
 15 **you're learning that there was a vote taken in the**  
 16 **legislature, that Mr. Stokesbary is a legislator, and**  
 17 **that he voted in favor of the plan; is that right?**  
 18 A. That's correct. This is the first time I've  
 19 heard of it.  
 20 **Q. Given some of the things you've learned today**  
 21 **for the first time regarding your counsel and their**  
 22 **representation in the other parallel lawsuit, do you**  
 23 **have any plans for how you want to proceed in this case?**  
 24 A. I'll have to refer to my legal counsel and talk  
 25 to him after.

1 going to run, how to go about it and not just put my two  
 2 feet in there and pray for the best, you know.  
 3 **Q. And this was a campaign against the incumbent**  
 4 **Republican, is it Dan Newhouse?**  
 5 A. That is correct.  
 6 **Q. And how many Republican candidates were running**  
 7 **in that race?**  
 8 A. There were a number of Republican candidates,  
 9 about five, including myself.  
 10 **Q. And were -- you're Latino; is that right?**  
 11 A. That is correct.  
 12 **Q. And were the --**  
 13 A. Well, I'm of Seminole-Negro descent and Latino.  
 14 **Q. Were the other Republican candidates in that**  
 15 **primary white?**  
 16 A. Yes, that is true.  
 17 **Q. All of them?**  
 18 A. Yes.  
 19 **Q. Now, I spent some time reviewing some of your**  
 20 **campaign materials and some of the videos and whatnot.**  
 21 A. I hope you didn't find it offensive. Sorry. I  
 22 just had to put that in there, so I apologize.  
 23 **Q. No, I -- I did not, and I enjoyed it.**  
 24 **One of the videos was -- you conducted it in**  
 25 **Spanish, and said something along the lines of that you**

1 **were the only candidate who was running for all the**  
 2 **people, including for the Latino people.**  
 3 **Do you recall that?**  
 4 A. Yes.  
 5 **Q. What did you mean by that?**  
 6 A. We are a fairly large minority district. The  
 7 state -- we're the second largest state population.  
 8 Latinos is second largest state population. We are  
 9 40 -- approximately 40 percent of the -- of the  
 10 population in the 4th Congressional District.  
 11 None of our representatives that have been  
 12 house reps truly understand the need to reach out to all  
 13 the people, understand -- you know, for example, when do  
 14 you ever see any of the house reps ever go to a  
 15 taqueria, you know? Mingle within the -- their -- their  
 16 people that they're supposed to represent, you know?  
 17 For me, there is a disconnection. Although  
 18 things have gotten much better. I mean, I was Ebony  
 19 Senate rep in college. I was part of LULAC, part of the  
 20 Republican National Hispanic Assembly.  
 21 My desire is that all people vote, whatever  
 22 that may be, but that they register to vote and that  
 23 they vote. But our -- it's my personal belief that our  
 24 representatives really don't understand the overall --  
 25 the people in their district, and they don't reach out

1 Senate rep in college. I was part of LULAC, part of the  
 2 Republican National Hispanic Assembly.  
 3 "My desire is that all people vote, whatever  
 4 that may be, but that they register to vote and that  
 5 they vote. But our -- it's my personal belief that our  
 6 representatives really don't understand the overall --  
 7 the people in their district, and they don't reach out  
 8 to them. And that's missing. And so --"  
 9 E X A M I N A T I O N (Continuing)  
 10 BY MR. GABER:  
 11 **Q. So we're waiting at the edge of our seats,**  
 12 **Mr. Garcia, to find out what followed "and so."**  
 13 A. And so that is one of the reasons why I decided  
 14 to run for U.S. Congress. I've got the experience.  
 15 I've done over a thousand loans for folks to be  
 16 homeowners in this state, with the federal government,  
 17 the GRH program. I've done AmeriCorps. I've worked in  
 18 the school districts. I'm 51, so I do have a prior work  
 19 background.  
 20 And I feel that there is a disconnect, but I  
 21 believe that that can be changed, and that's with a  
 22 sincere person who -- who has made a difference in --  
 23 whether it be for my country or whether it be in my  
 24 community. I have showed lifelong of making a  
 25 difference.

1 to them. And that's missing. And so --  
 2 MR. GABER: He may have frozen again. Last  
 3 time he worked it out and got himself back on, so maybe  
 4 we take a -- go off the record for a moment.  
 5 (Recess from 10:52 a.m. to 11:06 a.m.)  
 6 MR. GABER: So I guess back on the record.  
 7 Cindy, are you able to read back -- I know we cut out as  
 8 Mr. Garcia was answering the last question. Cindy, are  
 9 you able to read back my question and his answer, as far  
 10 as he got?  
 11 THE COURT REPORTER: "Question: What did  
 12 you mean by that?  
 13 "Answer: We are a fairly large minority  
 14 district. The state -- we're the second largest state  
 15 population, Latinos is second largest state population.  
 16 We are 40 -- approximately 40 percent of the -- of the  
 17 population in the 4th Congressional District.  
 18 "None of our representatives that have been  
 19 house reps truly understand the need to reach out to all  
 20 the people, understand -- you know, for example, when do  
 21 you ever see any of the house reps ever go to a  
 22 taqueria, you know? Mingle within the -- their -- their  
 23 people that they're supposed to represent, you know?  
 24 "For me, there is a disconnection. Although  
 25 things have gotten much better. I mean, I was Ebony

1 **Q. And is it your -- from living and from working**  
 2 **and from running as a candidate, I gather it was your**  
 3 **impression that there -- there's a lack of attentiveness**  
 4 **to the Latino community from our politicians?**  
 5 MR. STOKESBARY: Objection to the extent  
 6 that calls for a legal conclusion.  
 7 A. I think, in all perspective of our -- most of  
 8 our representation, they no longer represent the average  
 9 person or that of the lower class.  
 10 BY MR. GABER:  
 11 **Q. And so is it your experience that, in**  
 12 **particular, Latino voters in South Central Washington**  
 13 **oftentimes have a lower socioeconomic status than their**  
 14 **white counterparts?**  
 15 MR. STOKESBARY: Objection. Calls for  
 16 speculation.  
 17 A. I can't answer that in that sense to know -- to  
 18 have the experience that I could say that, you know, a  
 19 large -- the -- the -- you know, economically they're in  
 20 lower class zones; in other words, their income is not  
 21 as high for all people.  
 22 You know, you can take a look at Toppenish  
 23 School District. You could take a look at some of the  
 24 Yakima school districts. There's much poverty across  
 25 the board.

1 BY MR. GABER:  
 2 **Q. And is that the case in the Pasco area as well?**  
 3 A. Tri-Cities tends to do better, but I can't say  
 4 that that is, because I wouldn't know, but I can say in  
 5 Yakima, Lower Valley, free school lunch, you know. You  
 6 can see a lot of that and that purpose, but I can't say  
 7 I would -- I could say, you know, Tri-Cities itself.  
 8 **Q. Okay. But the -- the Yakima and the Lower**  
 9 **Valley, the Latino communities would share that in**  
 10 **common?**  
 11 A. Yeah, most would have that in common in that  
 12 demographic area.  
 13 **Q. And you were speaking in particular about how**  
 14 **you would be the only candidate in your primary race who**  
 15 **would be able to represent the Latino people.**  
 16 **Was it your impression that the candidates you**  
 17 **were running against were not really campaigning for**  
 18 **Latino votes in the primary?**  
 19 A. No. What I'm trying to say is that I want more  
 20 participation, and it's time for -- to try to get  
 21 everybody registered, which is, you know, a large Latino  
 22 population. You know, you want to see Latino  
 23 representation in leadership positions, but you want to  
 24 make sure that you do it through a fair process under  
 25 our constitution.

1 A. Yeah, in the 4th District.  
 2 **Q. Now, I read a newspaper article about a**  
 3 **controversy surrounding telephone messages that**  
 4 **supporters of yours wanted to be put out by the State**  
 5 **Republican Party, and there was an article where you**  
 6 **were criticizing the party for its actions there.**  
 7 **Do you recall that?**  
 8 A. That's correct. Absolutely. That's correct.  
 9 **Q. And one of the things that you alleged was that**  
 10 **the State Republican Party was trying to suppress Latino**  
 11 **voters in the primary.**  
 12 **Do you recall that?**  
 13 A. Absolutely. That is correct.  
 14 **Q. Can you just talk a little bit, explain that --**  
 15 **that event and -- and what --**  
 16 A. I will. First of all, I was one of five  
 17 Latinos in the nation to get supported out of Latino  
 18 StrikeForce out of Texas. Now, the RNC was involved to  
 19 help use the -- the phone bank system of the Republican  
 20 Party.  
 21 Now, we created our message, both in Spanish  
 22 and English, and we had approval to do this. And so for  
 23 every registered 4th District Latino Republican, we put  
 24 on that phone bank.  
 25 Now, this phone bank system was to help us to

1 So you're representing everyone. I want to  
 2 make that clear. You're representing everyone, and --  
 3 and you're doing what's in the best interest of your  
 4 district, you know, or 4th Congressional District, I  
 5 should say. So you're representing everybody.  
 6 What I want to see is more inclusion across the  
 7 board, you know, and that's why, when I went out there  
 8 to try to register voters, I didn't care who you are. I  
 9 want you to register, please. It's that important.  
 10 **Q. I agree with that. I get that.**  
 11 **Is it your impression that, in particular,**  
 12 **there's lower voter registration among Latino voters in**  
 13 **Yakima County than is the case with the proportion of**  
 14 **white voters who are registered to vote?**  
 15 A. It's been proven in the past, and you can look  
 16 at some of the news articles that Yakima Herald has put  
 17 out, that, you know, even though there's a large  
 18 representation in the Latino population, that when it  
 19 comes time to vote, unfortunately, there hasn't been  
 20 large numbers in being able to vote for whatever  
 21 candidate.  
 22 **Q. Right. So that's lower voter turnout among**  
 23 **Latino voters in Yakima area, as well as lower voter --**  
 24 A. Lower turnout in overall aspects.  
 25 **Q. Okay.**

1 get our vote out. And so the message was changed,  
 2 re- -- an RNC member who worked with the Washington  
 3 State Republican Party, with Caleb, who's the chairman  
 4 of the Washington State Republican Party and his  
 5 staffing, we had to get approval to use that, and we  
 6 finally did.  
 7 It was greatly delayed, for about three months.  
 8 Not only was it delayed, but when we got the messaging  
 9 out there for the voicemail, we had done over 10,000  
 10 plus phone calls.  
 11 And they switched the voicemail message. And  
 12 so it looked like Washington State Republican Party, a  
 13 general message, instead of saying, vote for Benancio  
 14 Garcia, 4th Congressional District candidate, and here's  
 15 the reason why.  
 16 Now, the only reason we found out about that  
 17 was because an RNC member quit. Gave me a phone call,  
 18 said, Ben, I quit because the Washington Republican  
 19 Party switched your voicemail. That is suppressing the  
 20 Latino vote.  
 21 Then there is the second aspect of things,  
 22 number two. They had funds -- Washington State  
 23 Republican Party had funds to hire two supervisors, one  
 24 in Yakima and one in Wenatchee, to register Republican  
 25 Latinos. They hired nobody.

1 Me being the only Latino representative, it  
 2 would have favored. Dan Newhouse would no longer be  
 3 your congressional victor. It probably would have been  
 4 Culp. But they greatly affected this election, the  
 5 outcome, and suppressed the Latino vote.

6 **Q. And was it your sense that that was sort of a**  
 7 **coordinated effort in the State Republican Party, to**  
 8 **suppress the Latino vote in the area?**

9 A. What I will say is this: They say it was a  
 10 mistake. There's no mistakes in a congressional race  
 11 like this. We have a third party out of Texas that told  
 12 them there was no misunderstanding to -- and --  
 13 misunderstanding about this.

14 As a matter of fact, you know, you probably  
 15 didn't see this, since you did your research on me. Did  
 16 you see the fact that I saved somebody's life in a --

17 **Q. I did --**

18 A. -- mass shooting? You know?

19 **Q. I did see that, and that was extraordinarily**  
 20 **impressive.**

21 A. You know, I thank God that I was there at the  
 22 right place, right time. My -- my thing is like it was.  
 23 I didn't change. I believe in seeing all people's  
 24 rights. I believe strongly in the civil rights.

25 That's why I was Ebony Senate rep in college.

1 **Q. You said the RNC member told you he was**  
 2 **quitting because of this; is that right?**

3 A. That's my understanding.

4 **Q. And that was because of the suppression of the**  
 5 **Latino vote in your race?**

6 A. Because of what happened in my race, yes,  
 7 that's correct.

8 **Q. Has anything been done to rectify the situation**  
 9 **with the State Republican Party?**

10 A. What I -- what I do want to do is go ahead,  
 11 after I'm completely settled in in my home and -- and  
 12 take care of other personal matters, I will go ahead and  
 13 then write a letter to the RNC, write a letter to the  
 14 state chairman, and write a letter to the 4th District  
 15 chairmen, chairpersons, and let them know about what has  
 16 occurred, what has happened.

17 This isn't just my word. You know, to be  
 18 supported, one in five in the nation, Latinos, that's a  
 19 privilege, and to know that the phone bank system does  
 20 work because they have a history of getting winning  
 21 candidates.

22 So I will be putting that out there, and I will  
 23 leave it in the hands of the Republican Party on what  
 24 they want to do, but I will certainly entertain the fact  
 25 that I may take legal aspects on this in some manner

1 And I feel -- and it doesn't matter which party it is.  
 2 I will do the right thing. For our voice not to be  
 3 heard and what I feel is suppression, we can disagree  
 4 upon this, and I welcome a lawsuit, you know.

5 We did not get fair representation in this 4th  
 6 Congressional District race. And it's not on the  
 7 candidate. This was done -- they can say, well, Ben,  
 8 you know you need to pay for that.

9 At no point in time, especially since I was  
 10 supported by a third party who is well connected to the  
 11 RNC, was that ever brought up. Why didn't you ask me,  
 12 we can't do this, instead of having my volunteers phone  
 13 bank, and instead of having my voice message out, it was  
 14 for the Washington State Republican Party. Not  
 15 acceptable.

16 **Q. And is it the case that you didn't find out**  
 17 **about this until after this had -- the decision had been**  
 18 **made not to use your message?**

19 A. It was before. It was before the decision. I  
 20 found out during the campaign process, but, you know,  
 21 those are -- are strong challenges when you've already  
 22 committed so many hours and so much in volunteers to  
 23 have to overcome. You can't take that time back.

24 **Q. Right.**

25 A. The impact has already been done.

1 because what occurred is not acceptable. And I am a  
 2 fighter, you know. And if it's wrong, I will fight it.

3 **Q. Did you hear from Latino voters who were upset**  
 4 **that this had happened in your race?**

5 A. A lot of people were upset. I gave a speech  
 6 about it in Ellensburg -- not Ellensburg. I gave a  
 7 speech about it -- oh, gosh, what district? I gave a  
 8 speech about it, and some of the candidates had  
 9 questions, you know, like what are you talking about  
 10 exactly here? You know.

11 And this, like I said, was later on toward --  
 12 you know, toward the end, where, you know, you had to  
 13 make it clear how the facts have occurred. And the  
 14 people were upset, you know.

15 And what was wonderful is, you know, to see  
 16 some of the candidates say, what exactly are we talking  
 17 about here, whether it was Culp's people or whether it  
 18 was Sessler's people, you know, or it was people in  
 19 general that were there asking questions, you know, "Are  
 20 you saying this happened?"

21 I go, "Absolutely, and this is why."

22 And it's just not my word. You don't give us  
 23 access to your phone bank system -- because they, like  
 24 the Democrat Party can go ahead and say, hey, let me  
 25 see -- look at your -- look at your phone system, you

1 know? Let me see what you got out there, you know.  
 2 Obviously I had access to it. Obviously we  
 3 created within our district the phone bank system and  
 4 those phone numbers. And it was to go ahead and give  
 5 knowledge that I am running.  
 6 And the goal was to get minimal to 50,000 phone  
 7 calls, you know, which in a midyear election can turn  
 8 toward -- favorable toward you. So...  
 9 **Q. Did you, like, communicate with people about**  
 10 **this issue? Did you send text messages or email with**  
 11 **people about your concerns about the --**  
 12 A. I -- I did send emails probably to some of the  
 13 newspapers, you know. And really they didn't have, you  
 14 know -- I shouldn't say I personally did, but some of --  
 15 of the folks that my staff had, you know.  
 16 Because we're concerned. You know, we're --  
 17 we're concerned, one, how our volunteers were used.  
 18 We're concerned about the communications and lack of, to  
 19 not be given notice that our voicemail was not done, and  
 20 this is through the Washington State Republican Party.  
 21 When did this change occur? Why did it occur?  
 22 Couldn't get an answer really clearly, as -- if  
 23 you saw the newspaper, it was quite ambiguous, you know.  
 24 But the bottom line is, you got your hand caught in the  
 25 cookie jar. You didn't expect me to ever know about it,

1 but I found out.  
 2 And that was because someone was being honest  
 3 and decided to leave their RNC, and it just changed his  
 4 life, you know, in all honesty. He's not returned back  
 5 to politics.  
 6 **Q. Who is the RNC member who left?**  
 7 A. Manice (phonetic) Perry. I would spell it  
 8 correctly for you, but I'd have to get off-line.  
 9 **Q. No, you're -- we don't expect you to try to use**  
 10 **your phone in your current circumstance.**  
 11 A. Yeah, I'm in my car right now. I didn't think  
 12 this would ever be happening. Wow.  
 13 **Q. We definitely appreciate it.**  
 14 **Have you spoken or are you aware of any other**  
 15 **Republican Latino candidates who have faced similar --**  
 16 **or, you know, the same type of problem with the State**  
 17 **Republican Party?**  
 18 A. Well, I will say I was told about a situation  
 19 in King County, and that was through Sea Chan, who  
 20 happened to run for the 4th Congressional District, I  
 21 think it's the 4th, in King County.  
 22 And so he has a -- he has a good knowledge base  
 23 of -- of what occurred to a candidate who was Asian, you  
 24 know. So, you know, we had quite a long discussion on  
 25 things.

1 We want to fix things. We're both military.  
 2 We want to fix things. We believe in this country.  
 3 We -- we, you know, put our lives out there for it. I  
 4 wear the scars on my body for it, you know.  
 5 To give up a federal position because things  
 6 are broken, you don't take lightly a career and throw it  
 7 away. You know, I'm not here to be liked. I'm here to  
 8 fight for the right thing, and that's why I'm here.  
 9 **Q. Now, Mr. Hughes asked you a bit about Senator**  
 10 **Torres, and I gathered from your answer and sort of your**  
 11 **expression that she might not -- you might not align**  
 12 **politically. Am I right about that?**  
 13 A. Right. But it's not -- it's not necessarily,  
 14 you know -- irregardless of who the candidate is, I  
 15 believe the district was illegally designated, done, and  
 16 at the time my lawyer did too.  
 17 And so, you know, I base it on my Complaint.  
 18 It don't matter who the representative is, irregardless.  
 19 I want this to go all the way through to determine  
 20 whether or not -- if I'm wrong, then I am. If I'm  
 21 right, then I am. But I want the right thing to happen.  
 22 **Q. So my question is less about the -- like**  
 23 **setting aside the district, and then just talk about**  
 24 **Senator Torres in terms of, you know, her political**  
 25 **beliefs and yours.**

1 **Is that -- is she someone who you would choose**  
 2 **to be your representative in the state legislature?**  
 3 A. You know, I believe I voted for her. I think I  
 4 did. I think she is a Republican. I believe I voted  
 5 for her. I spoke to her just a bit, not -- I mean, I  
 6 shook her hand. That was about it.  
 7 We were busy at the event, so -- yeah, I -- I  
 8 fine line item went through all the candidates, you  
 9 know, and, you know, I -- I try to vote for who I think  
 10 is the best option, you know.  
 11 I am Republican, but there are reasons for  
 12 that. But I have a history of voting both ways. You  
 13 know, I am conservative, but I want to see the people  
 14 that -- that are conservative and that I think will do  
 15 the best job. And if they did a good job on both ends,  
 16 I wouldn't be here today.  
 17 **Q. Do you know how long Senator Torres has**  
 18 **identified as a Republican?**  
 19 A. You know, I didn't even know who she was.  
 20 Probably as long as she had that meeting with Jim  
 21 Honeyford.  
 22 **Q. Are you aware of views in the community that**  
 23 **she might not -- her ideology may not, in fact, be**  
 24 **Republican, but that she was run as such?**  
 25 A. You know, I didn't -- to be honest, I didn't

1 stay focused on her, for a number of reasons, but on  
 2 other people, because I -- I was very busy running my  
 3 race, trying to make meetings, and running in -- up and  
 4 down what is our largest congressional district in the  
 5 state.

6 **Q. And am I right that --**

7 A. Yakima County's pretty large.

8 **Q. Am I right that Senator Torres was the only**  
 9 **Republican candidate available for you to vote for, for**  
 10 **that race?**

11 A. She was. Yeah, she was the only one. Now,  
 12 that's after Senator Honeyford -- State Senator  
 13 Honeyford had decided that he wasn't going to run again,  
 14 after the fact. But that's politics for you.

15 **Q. Now, you mentioned that you had sent some**  
 16 **emails, or you -- you or your staff had sent some emails**  
 17 **to some newspapers about the controversy with the State**  
 18 **Republican Party.**

19 **Did you text people about that, as well?**

20 A. Did I what?

21 **Q. Did you send text messages on your phone to**  
 22 **discuss that issue with friends, colleagues, anyone?**

23 A. I did with the Latino StrikeForce because they  
 24 were the ones that endorsed me. The moment I found out  
 25 was -- like I said, I was shocked that this would occur,

1 you know, we're glad to be home. We've moved five  
 2 times. A little exhausted, you know, putting my family  
 3 through, you know, with what occurred with the house  
 4 fire, and still having to meet the requirements to get  
 5 it all fixed. It's almost there.

6 And, you know, the documents, as far as  
 7 basically talking to a couple of reporters, you know,  
 8 there was one news article that I'm aware of that they  
 9 put it out there, and basically they were like, "Garcia  
 10 was angry," you know.

11 Well, not so much angry in the sense that  
 12 you're displeased with the fact that this can occur and  
 13 you want fair play. And I believe -- I don't cheat, you  
 14 know. That's not who I am.

15 And I believe in the American dream, and I  
 16 believe that we -- you know, that the framers of this  
 17 country created the greatest -- second greatest document  
 18 in the world. The first is the holy scriptures. Second  
 19 is our constitution.

20 **Q. And so it sounds to me, at least with respect**  
 21 **to the -- to your -- the 4th District Republican primary**  
 22 **and the -- your experience with the effort to suppress**  
 23 **the Latino vote there, that that's an example of an**  
 24 **unequal electoral opportunity for Latino voters in the**  
 25 **area; is that right?**

1 you know. We're talking a U.S. congressional race.  
 2 We're not talking -- even if it's a  
 3 misunderstanding, whatever race it may be, the  
 4 volunteers that put their time in, the support you got,  
 5 you know, it affects things, you know. So yeah.

6 **Q. Now, you received two subpoenas; is that right?**

7 A. I'm sorry.

8 **Q. So you're here talking to us today, or talking**  
 9 **to me, at least, because you received a subpoena to**  
 10 **testify; is that right?**

11 A. Yes. There's another one, I think on Monday or  
 12 Tuesday, via Zoom.

13 **Q. So that -- okay. So let me just -- how -- did**  
 14 **you -- so you received two subpoenas; right? One was**  
 15 **for your deposition testimony and one was for documents.**

16 **Do you understand that?**

17 A. Right. Right. And -- and the documents, I  
 18 need time to get that because I still ain't moved in my  
 19 house. So I have a lot of things packed away in  
 20 storages. And, you know, I don't even have a printer  
 21 right now. I need to go buy ink for it, but after --  
 22 you know, what I'm saying is -- because -- we barely  
 23 made it in time to move into our home.

24 **Q. Sure. Sure. And then --**

25 A. We got construction going on still. So it's --

1 MR. STOKESBARY: Objection --

2 A. Yes.

3 MR. STOKESBARY: -- as to form.

4 A. Sorry.

5 BY MR. GABER:

6 **Q. Go ahead, Mr. Garcia.**

7 A. I agree. I agree. I think the head of  
 8 Washington State Republican Party has its challenges.

9 **Q. And that -- those challenges are negatively**  
 10 **affecting the Latino voters where you live; is that**  
 11 **right?**

12 A. I agree.

13 **Q. Now, I understand that -- when did you -- when**  
 14 **did you see the -- the copy of the subpoenas for the**  
 15 **first time?**

16 A. I think it was Tuesday, last Tuesday, I  
 17 believe. It was served around 7:00 in the evening, I  
 18 think.

19 **Q. So you saw those when the process server came**  
 20 **to the house; is that right?**

21 A. Yes. The person serving me the documents,  
 22 yeah.

23 **Q. So you didn't get those ahead of time from your**  
 24 **counsel?**

25 A. No.

1 **Q. Well, I can tell you your counsel's had them**  
 2 **for two weeks, and I understand the need for more time,**  
 3 **particularly given the circumstance with the fire at**  
 4 **your house.**

5 **I would, you know, request that we -- and would**  
 6 **you be agreeable to maybe sit with us again if we have**  
 7 **any questions based on what's in those documents?**

8 A. I would. There were some text messages that  
 9 were sent, and, you know, I made -- we made some phone  
 10 calls to -- to the fact, you know, and it was basically  
 11 one reporter that basically, you know -- and it was just  
 12 a phone call.

13 So -- they were trying to understand how this  
 14 was suppressing the vote, you know, or they wanted a  
 15 complete, you know -- like, who's the one that did it?  
 16 Well, you know -- evidence on that.

17 And I'm like, wait a minute. We've got a video  
 18 on the training. We've got an email that -- from the  
 19 Latino StrikeForce. We had access to their phone  
 20 banking system.

21 We created our own district in the sense of all  
 22 registered Latino voters, Republican voters. 10,000  
 23 phone calls were made and the voicemail was switched.  
 24 You don't have access to all that, and not have their  
 25 permission for it, and there's no misunderstanding of

1 why we're doing it.

2 So, you know, it's just not acceptable. If  
 3 they wanted to say no because maybe they have a  
 4 candidate dog in the fight, that they would hopefully  
 5 let you know, then just say no.

6 But I know -- I have a hard time trusting  
 7 politicians, and I have a hard time trusting lawyers,  
 8 you know. Just being honest. And -- so, you know, I  
 9 guess I'm the little guy fighting for the big dream, but  
 10 I -- I believe that I will be where I need to be in a  
 11 little while because I'm a big fighter.

12 **Q. Well, I have no doubt about that. With respect**  
 13 **to the -- sorry. Back to the text messages. It sounds**  
 14 **like there's some texts that you exchanged with the**  
 15 **Latino Task Force people; is that --**

16 A. StrikeForce.

17 **Q. StrikeForce?**

18 A. Latino StrikeForce out of Texas.

19 **Q. Okay.**

20 A. Yes, there is, you know.

21 **Q. Okay.**

22 A. Yes, there is.

23 **Q. And you still have all of those?**

24 A. I should have the texts because, like I said, I  
 25 was on the phone the moment I found out, and Manice had

1 verbally given me the -- why he quit, but -- in his text  
 2 message, it was a little different, that they removed  
 3 the Spanish version, you know, on the text message.

4 So, you know, we both were pretty disheartened  
 5 in -- in what we want to see in leadership. How could  
 6 you not let the Latino StrikeForce know? How can you  
 7 not let the RNC member know? How can you not let my  
 8 staff or myself know? That's a big, big mistake. Out  
 9 of respect of me running for congress, how can you not  
 10 let any of these organizations know?

11 **Q. And so the Spanish language part was removed as**  
 12 **well?**

13 A. Yes.

14 **Q. And just to clarify, the -- you know, I know**  
 15 **you're -- the Congressional District 4 is larger than --**

16 A. It's the largest.

17 **Q. Yeah.**

18 A. It's the largest in the state.

19 **Q. But it covers all of Yakima County; is that**  
 20 **right?**

21 A. Yes.

22 **Q. And then it also includes Benton County and**  
 23 **Grant County; is that right?**

24 A. Yeah. All the way from the Canadian border,  
 25 from Okanogan, basically almost central, almost Central

1 Washington, down to the Columbia. Klickitat, Benton,  
 2 Franklin, Adams, Grant, Okanogan, Yakima. At one point  
 3 it was parts of Walla Walla, a little tiny part, you  
 4 know.

5 **Q. And so Pasco is in the district as well; right?**

6 A. Absolutely.

7 **Q. And Othello and Adams County?**

8 A. Yes.

9 **Q. And then all of -- all of Yakima. Mattawa's in**  
 10 **the district?**

11 A. Yes.

12 **Q. So there's quite a bit of overlap between**  
 13 **District 15 in the legislative map and District 4 for**  
 14 **the congressional plan?**

15 A. Yeah.

16 **Q. Now, I understand that you need time to look**  
 17 **for the documents. Have you looked through them at all**  
 18 **in response to the subpoena --**

19 A. No.

20 **Q. -- for today?**

21 A. No, no.

22 **Q. Okay.**

23 A. And to be honest, I wasn't sure what -- what  
 24 you would want from me in documents, or how the  
 25 question -- you know, the -- seriously? She just banged

1 my car. Sorry. Anyways, I'm sorry. What was the  
 2 question again?  
 3 **Q. I think I had asked whether you had looked**  
 4 **at -- looked for the documents before today.**  
 5 A. No. I mean, well, I didn't simply because I  
 6 wasn't sure what was going to be asked of me, you know,  
 7 and having so much boxed up and five moves, I would have  
 8 to find out where to look, you know.  
 9 **Q. But you have your phone and, you know, that --**  
 10 A. Yes.  
 11 **Q. -- would have the text messages and whatnot,**  
 12 **and your email you have access to now; right? We could**  
 13 **start with the electronic communications --**  
 14 A. Yeah, my -- right. But my email for the  
 15 congressional race is getting to the point to where I  
 16 need to get ready to pay for another year, so I don't  
 17 know if I'm going to, you know, at this point because  
 18 it's just an email. But still it's a little bit of  
 19 money out of the pocket, you know.  
 20 **Q. So it probably makes sense to start there and**  
 21 **collect those so that you get them before you have to**  
 22 **pay to host that again, so that --**  
 23 A. Right. And I hope to get to them by next week,  
 24 you know. Like I said, I don't got my computer up yet.  
 25 We still have some work to be done in the house. But I

1 will be getting -- I can get to them.  
 2 **Q. Okay.**  
 3 A. You know, and I think basically everything was  
 4 just done by phone conversation, other than a few texts,  
 5 which had to do with the Latino StrikeForce and had to  
 6 do with Per- -- Manice in regards to that.  
 7 **Q. So I want to -- I know this is difficult for**  
 8 **you because you're in your car on the phone, but I'm**  
 9 **going to share my screen and see if you can see it.**  
 10 **Just one moment.**  
 11 **So before I do that, so the complaint you had**  
 12 **about -- setting aside your thought that it's a racial**  
 13 **gerrymander, District 15 --**  
 14 A. Okay.  
 15 **Q. -- your geographic complaint, as I understand**  
 16 **it, is it's stretching, you know, from Yakima County**  
 17 **further over toward Franklin County? Is that --**  
 18 A. Yes. And again, I'm seeing a little fuzzy on  
 19 the reading thing, you know, because the glasses I  
 20 thought that were supposed to be my prescription aren't  
 21 quite -- they're -- they're not -- I'm going to have to  
 22 send them back.  
 23 **Q. So I've pulled up a map on the screen. Can you**  
 24 **see that?**  
 25 A. Yeah, I can see the red and -- and the lines,

1 but I -- I -- I'm having trouble distinguishing the  
 2 lines a little bit. I apologize.  
 3 **Q. No, no worries. So I can kind of explain it to**  
 4 **you a little bit. You see the red is in the southern**  
 5 **half of Yakima County? Can you see that?**  
 6 A. Umm --  
 7 **Q. Maybe -- maybe even pull the phone a little bit**  
 8 **closer to you.**  
 9 A. Well, I'm -- yeah, I mean, I'm sorry. It's --  
 10 okay. Go ahead. I'm sorry. I'm just...  
 11 **Q. So do you see where the red area is situated on**  
 12 **the map, in -- primarily in Yakima County?**  
 13 A. Yeah. I see. I see the red.  
 14 **Q. Now, if the district looked something like**  
 15 **this, would this resolve your geographic concerns?**  
 16 MR. STOKESBARY: Objection as to form.  
 17 A. I -- you know, I got to apologize. I really  
 18 can't answer that. I'm having -- I'm just having a lot  
 19 of issues reading. I mean, I can't even read the -- the  
 20 subpoena and stuff, so I -- I really apologize for that.  
 21 I didn't think I -- these glasses -- set of glasses I  
 22 brought would -- well, I thought they were meant for me.  
 23 Apparently...  
 24 BY MR. GABER:  
 25 **Q. Okay. So you can't --**

1 A. I'm sorry.  
 2 **Q. -- see where the red is on the map?**  
 3 A. No, I -- I see the red, but I'm having trouble  
 4 with the lines distinguishing. They're fuzzy.  
 5 **Q. Okay.**  
 6 A. I mean, I'm seeing everything fuzzy, and so I  
 7 apologize.  
 8 **Q. Okay. Well, we don't need to keep testing your**  
 9 **eyes.**  
 10 A. Yeah. Sorry.  
 11 **Q. Did you -- now, earlier we talked about how**  
 12 **this is the first time, you know, when I told you, and**  
 13 **Mr. Hughes mentioned it as well, about the intervenors**  
 14 **and their opposite relief that they want.**  
 15 **I gather you haven't signed any sort of**  
 16 **conflict waiver?**  
 17 A. No.  
 18 **Q. And so no -- no conflict waiver --**  
 19 MR. STOKESBARY: Hold on. Hold on, Mark.  
 20 I'm going to object to this question to the extent it  
 21 calls for privileged attorney-client communications,  
 22 and, Ben, ask you not to discuss any conversations  
 23 between us.  
 24 THE WITNESS: Sorry.  
 25 MR. HUGHES: I don't think the question



1 whether there was a conflict waiver is privileged, Drew.  
 2 BY MR. GABER:  
 3 **Q. Yeah. And so, Mr. Garcia, I'm not asking you**  
 4 **for any conversations with your attorneys. My question**  
 5 **is simply, have you signed any sort of written conflict**  
 6 **waiver with your attorneys and with the -- with the**  
 7 **parties in the other case?**  
 8 MR. STOKESBARY: Again, I would say that  
 9 things he's signed that exist between me and him are --  
 10 are the definition of privilege.  
 11 MR. HUGHES: Well, a conflict waiver goes to  
 12 the -- the outer bounds of the privilege relationship;  
 13 right? So if there is -- if there is a conflict waiver,  
 14 I would think that would be -- well, just sort of  
 15 freestyling here, I guess. I wouldn't say the existence  
 16 of a conflict waiver falls within the privilege, but --  
 17 MR. GABER: I think we have the answer on  
 18 the record.  
 19 BY MR. GABER:  
 20 **Q. How many times during the course -- since**  
 21 **you've filed the lawsuit, how frequently have you spoken**  
 22 **with Mr. Stokesbary?**  
 23 A. Since the filing of the lawsuit, so when the  
 24 Complaint was filed, after that? Is that what you mean?  
 25 **Q. Correct.**

1 MR. STOKESBARY: Yes. I'm going to object  
 2 to all of your requests regarding my communication with  
 3 my client.  
 4 BY MR. GABER:  
 5 **Q. Mr. Garcia, do you understand that you're the**  
 6 **holder of the privilege?**  
 7 A. Yes.  
 8 **Q. And do you understand that you have the power**  
 9 **to determine whether you want to assert that privilege**  
 10 **or not?**  
 11 A. Yes, I -- I will assert the privilege. I'm  
 12 going to do what's in my best interest and why I filed  
 13 this lawsuit.  
 14 **Q. And -- but for the record, you were under the**  
 15 **understanding that you were required to show up in**  
 16 **Tacoma this morning; is that -- is that fair?**  
 17 A. Well, after -- I had already -- once I got the  
 18 subpoena, I had already made the decision I was coming  
 19 to Tacoma. I have family up here. I thought, honestly,  
 20 I was going to be in a legal office, probably, you know,  
 21 under -- not -- not in front of -- oh, my goodness.  
 22 Certainly not in front of the coffee shop, Starbucks, or  
 23 whatnot.  
 24 So I had already made the decision that I would  
 25 drive up here because it did give me the place,

1 A. I think it was two more times last week, like  
 2 Thursday or Friday or -- or Monday. For sure Monday.  
 3 It was late last week.  
 4 **Q. And so that -- between the filing of the**  
 5 **lawsuit and the spring of 2022, the next time you spoke**  
 6 **with your attorney was last week?**  
 7 A. Yeah.  
 8 **Q. And did you call him --**  
 9 A. After I --  
 10 **Q. -- or -- I didn't mean to interrupt. Go ahead.**  
 11 A. No, I -- I had -- he returned my call.  
 12 **Q. So you reached out to him last week?**  
 13 A. Yeah. Yeah, I did.  
 14 **Q. Was that after you'd received the subpoena from**  
 15 **the process server?**  
 16 A. Yes.  
 17 **Q. Did anyone tell you how to attend today's**  
 18 **deposition?**  
 19 MR. STOKESBARY: Again, to the extent this  
 20 calls for attorney-client communication, I'm going to  
 21 instruct you not to answer this, Ben.  
 22 MR. GABER: I don't think I'm asking for  
 23 legal advice. I'm asking if he was told where to show  
 24 up today.  
 25 Does your objection stand to that question?

1 location, and it did give me the time and date that I  
 2 was supposed to be there, so I had already made those  
 3 plans once I had received it.  
 4 And I understood, under the second subpoena,  
 5 that it was requiring documents, but I was going to  
 6 request a stay for that because -- simply because I just  
 7 got stuff boxed up and the situation of moving five  
 8 times, it's going to take me about a month and a half to  
 9 get everything all straightened out, you know, for my  
 10 family and myself, you know. We still got stuff,  
 11 clothing that's boxed here, still got to report all our  
 12 property that was damaged. So yeah.  
 13 MR. GABER: Okay. I'd like to take just a  
 14 five-minute break if that's okay with you. I realize --  
 15 and I don't want to make -- we're just about done, and I  
 16 don't want to make you sit in your car like this for  
 17 longer than you need to.  
 18 So on behalf of our -- you know, the plaintiffs  
 19 in this -- the case that you're not involved in, I want  
 20 to thank you for traveling and for going out of your way  
 21 today, and for dealing with less than ideal  
 22 circumstances. And, you know, I'm sorry that you didn't  
 23 know that that wasn't necessary.  
 24 But let's take a five-minute break and  
 25 hopefully we can wrap up pretty soon after that.

1 Mr. Hughes might have some more questions as well, but I  
2 think -- I think we won't take up too much more of your  
3 time.

4 THE WITNESS: Thank you.  
5 (Recess from 11:54 a.m. to 12:01 p.m.)  
6 E X A M I N A T I O N (Continuing)

7 BY MR. GABER:

8 **Q. Just a couple more questions for you,**  
9 **Mr. Garcia.**

10 **I want to ask a little bit about if you have**  
11 **experience with how the Republican Party operates in**  
12 **terms of recruiting and getting candidates to run for**  
13 **the state legislature in the Yakima County area.**

14 **Do you -- what are your observations about how**  
15 **that process works? Is it sort of a top-down effort to**  
16 **kind of get a slate of candidates?**

17 MR. HUGHES: Object to form.

18 MR. STOKESBARY: Yeah, objection as to form.

19 BY MR. GABER:

20 **Q. And you can answer.**

21 A. Oh, okay. Well, you know, pre-COVID, I would  
22 say that there was a lot of -- you know, whether it be  
23 PCOs, or whether it be top-down, say, hey, you know, we  
24 need to continue to reach out to people, to be a more --  
25 more involved.

1 It just has greatly affected people -- you know, more  
2 concerned about their health, fearful of things. You  
3 know, things aren't quite as normal as they used to be  
4 before the COVID pandemic. So it's a challenge across  
5 the board.

6 **Q. Who is paying for your lawyers in this case?**

7 A. I don't know.

8 **Q. Is it your understanding that someone or some**  
9 **entity is --**

10 A. Yes. Some -- someone or some entity is, yes.

11 **Q. Do you know if that's a national organization**  
12 **or a Washington State-based organization?**

13 A. I don't know.

14 **Q. Is that information that you would want to**  
15 **know, to know, you know, where the money's coming from**  
16 **for your lawsuit?**

17 MR. STOKESBARY: Objection as to form.

18 A. Sorry. I'm trying to keep this charged.

19 BY MR. GABER:

20 **Q. My question was, is that information that, you**  
21 **know, you would kind of want to know, to know where the**  
22 **money that's funding the -- your counsel is coming from?**

23 A. I will discuss that with my lawyer. I do --  
24 you know, on that.

25 **Q. And I asked you whether you'd spoken to**

1 After COVID, so much has changed in people  
2 feeling safe and people wanting to participate, you  
3 know. So much has changed after that. And like I said,  
4 I was involved in a congressional race where I was  
5 helping my friend try to get elected in -- in 2015,  
6 2016. And it's just so different nowadays.

7 Give me a moment. I need to plug this in.

8 **Q. Sure.**

9 A. All right. Hopefully it holds. Shoot. I'm  
10 going to have to go sideways. I apologize for --  
11 because I got a low battery.

12 **Q. There won't be much more.**

13 A. Okay. And so there -- you know, as far as  
14 recruiting, I think, you know, it's just been a struggle  
15 in -- in getting people to show up to meetings as a  
16 whole.

17 And really, you know, people are trying to  
18 find -- how do we get more -- more of the community to  
19 get involved in not just our party, but involved in  
20 politics as a whole.

21 You know, you have an event. The numbers  
22 aren't what they used to be. So more than anything,  
23 COVID's had its effect in the way our lives are, more  
24 than anything.

25 That has nothing do with the parties so much.

1 **Mr. Stokesbary, or how many times since when the**  
2 **Complaint was filed and today, and you mentioned, I**  
3 **think, that you had spoken on the phone last week twice,**  
4 **and that's it.**

5 **Has there been any emails or letters that**  
6 **you've received in the mail in that time?**

7 A. Prior to that, I believe there was a letter --  
8 I believe there was an email sent, but --

9 **Q. When, about, would that have been?**

10 A. Maybe six months ago, maybe five months, six  
11 months.

12 **Q. So other than that, you've not heard anything**  
13 **from Counsel in at least six months' time?**

14 A. No.

15 **Q. How do you know that someone is paying for your**  
16 **attorneys?**

17 MR. STOKESBARY: Objection as to form.

18 BY MR. GABER:

19 **Q. And you can answer.**

20 A. I can't -- I don't know.

21 **Q. You just have an awareness that there is money**  
22 **being spent?**

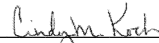
23 A. I don't know.

24 MR. GABER: I have no further questions at  
25 this time. Mr. Hughes may have a couple additional.

1 I'm not sure.  
 2 MR. HUGHES: I do, yeah. Just a couple.  
 3 FURTHER EXAMINATION  
 4 BY MR. HUGHES:  
 5 **Q. Mr. Garcia, do you know who Dr. Mark Owens is?**  
 6 A. No.  
 7 **Q. So you've never seen his expert report in your**  
 8 **case?**  
 9 A. The which report?  
 10 MR. STOKESBARY: Objection. Misstates the  
 11 record.  
 12 BY MR. HUGHES:  
 13 **Q. You've never an expert report from Dr. Mark**  
 14 **Owens?**  
 15 A. I didn't even know who he was.  
 16 **Q. You don't know that -- you didn't know that**  
 17 **he's been put forward as an expert in your case?**  
 18 MR. STOKESBARY: Objection. Misstates the  
 19 record.  
 20 BY MR. HUGHES:  
 21 **Q. You can answer.**  
 22 A. No, I didn't know. Sorry.  
 23 **Q. And you've never paid a bill of his?**  
 24 A. No.  
 25 **Q. Do you know when trial is scheduled for this**

1 **Q. So you intend to vote in the 15th District --**  
 2 **15th Legislative District in future elections?**  
 3 A. Yes.  
 4 **Q. So in your other answers today, you have tried**  
 5 **to answer all the questions to the best -- best of your**  
 6 **knowledge; right?**  
 7 A. True, yes.  
 8 **Q. But is it -- is it impossible for you to be**  
 9 **100 percent sure regarding things that happened months**  
 10 **ago?**  
 11 MR. GABER: Object to the form.  
 12 THE COURT REPORTER: I didn't hear the  
 13 answer. I got the objection.  
 14 A. Yes.  
 15 MR. STOKESBARY: Okay. Those are the only  
 16 questions I have.  
 17 MR. GABER: I have nothing further. I just  
 18 want to thank you, Mr. Garcia, again, and apologize for  
 19 the circumstances that you find yourself in.  
 20 THE WITNESS: Thank you.  
 21 (Deposition concluded at 12:11 p.m.)  
 22 (Reading and signing was requested  
 23 pursuant to FRCP Rule 30(e).)  
 24 -o0o-  
 25

1 **case?**  
 2 A. No.  
 3 **Q. No one's told you that?**  
 4 A. No.  
 5 MR. HUGHES: I think that's all I have.  
 6 Thank you.  
 7 MR. STOKESBARY: I -- can I ask just a  
 8 couple questions?  
 9 MR. HUGHES: Of course.  
 10 EXAMINATION  
 11 BY MR. STOKESBARY:  
 12 **Q. Hey, Ben. Just a few questions for you.**  
 13 A. Yeah.  
 14 **Q. Did you vote in the 2022 primary and general**  
 15 **elections?**  
 16 A. Yes.  
 17 **Q. Do you intend to vote in future elections?**  
 18 A. Yes.  
 19 **Q. And let me back up.**  
 20 **So you currently live in the 15th District;**  
 21 **right?**  
 22 A. Yes.  
 23 **Q. And you intend to stay there, as far as you**  
 24 **know?**  
 25 A. Yes.

1 CERTIFICATE  
 2  
 3 STATE OF WASHINGTON  
 4 COUNTY OF PIERCE  
 5  
 6 I, Cindy M. Koch, a Certified Court Reporter in  
 7 and for the State of Washington, do hereby certify that  
 8 the foregoing transcript of the deposition of Benancio  
 9 Garcia III, having been duly sworn, on February 3, 2023,  
 10 is true and accurate to the best of my knowledge, skill  
 11 and ability.  
 12 Reading and signing was requested pursuant to  
 13 FRCP Rule 30(e).  
 14 IN WITNESS WHEREOF, I have hereunto set my hand  
 15 and seal this 6th day of February, 2023.  
 16  
 17  
 18  
 19  
 20   
 21 CINDY M. KOCH, CCR, RPR, CRR #2357  
 22  
 23 My commission expires:  
 24 JUNE 9, 2026  
 25



<b>A</b>				
<b>a.m</b> 5:2 41:18,18 70:5,5 101:5	50:13 <b>agreement</b> 23:14 53:9 62:11,12,24 64:13,16,19,25	72:17 81:22 83:10 95:18 97:17 98:21 101:20 104:19 105:21 107:5,13	93:3,6 103:25 <b>asking</b> 8:17,18 18:3 19:25 26:3 30:22 36:9 37:8 60:2 61:9 62:21 80:19 97:3 98:22,23	65:23 82:14 84:22 87:8 <b>awareness</b> 104:21 <b>awkward</b> 10:1
<b>ability</b> 108:11	<b>aharless@campa...</b> 2:16	<b>answered</b> 23:3 <b>answering</b> 70:8 <b>answers</b> 7:23 8:18 107:4	<b>aspect</b> 76:21 <b>aspects</b> 74:24 79:25	<b>B</b>
<b>able</b> 12:19 13:4 30:1 37:17 48:17 63:6,12 70:7,9 73:15 74:20	<b>ahead</b> 7:5,11 13:12 17:15 25:5 31:5 31:13 37:18 38:19 38:21 42:14 47:15 56:23 61:20 66:6 67:21 79:10,12 80:24 81:4 88:6 88:23 95:10 98:10	<b>anticipate</b> 8:21 <b>anyway</b> 17:15 <b>Anyways</b> 93:1 <b>apologies</b> 58:21 <b>apologize</b> 10:2 20:18 27:25 28:7 34:19,20 37:6 41:3 47:6 51:1,12 52:21 55:22 57:19 57:24 58:20 63:4 65:11 68:22 95:2 95:17,20 96:7 102:10 107:18	<b>Assembly</b> 12:1 13:10 69:20 71:2 <b>assert</b> 99:9,11 <b>Assistant</b> 3:9 <b>associates</b> 59:6 <b>assume</b> 29:6 62:7 65:12 66:12 <b>attached</b> 19:7 <b>attend</b> 18:21 98:17 <b>attention</b> 15:2 35:19 <b>attentiveness</b> 72:3 <b>attorney</b> 3:9 9:9 10:5,10 20:11 23:14 33:16,23 57:18 58:5,8,9 59:11 66:13 98:6	<b>back</b> 11:10 17:18 40:12 41:21 43:4 43:7 46:22 55:19 70:3,6,7,9 78:23 82:4 90:13 94:22 106:19 <b>Backer</b> 2:4 <b>background</b> 71:19 <b>banged</b> 92:25 <b>bank</b> 75:19,24,25 78:13 79:19 80:23 81:3 <b>banking</b> 89:20 <b>barely</b> 86:22 <b>base</b> 82:22 83:17 <b>based</b> 15:5,6 22:7 22:11 32:23 33:6 35:12 89:7 <b>basically</b> 22:25 46:4 56:9 58:16 87:7,9 89:10,11 91:25 94:3 <b>basis</b> 22:9 <b>battery</b> 102:11 <b>behalf</b> 100:18 <b>bel-</b> 6:3 <b>belief</b> 69:23 71:5 <b>beliefs</b> 42:19 43:11 45:4 83:25 <b>believe</b> 11:20,22,24 12:1 13:1,15 14:3 15:5 32:9,23 33:7 33:15 39:25 40:18 40:22,25 41:23 43:14 44:22,24 45:5,6 47:17,23 51:6 55:4 58:7,8 58:17 59:5 71:21 77:23,24 83:2,15 84:3,4 87:13,15
<b>Absolutely</b> 60:18 75:8,13 80:21 92:6 <b>acceptable</b> 78:15 80:1 90:2 <b>access</b> 80:23 81:2 89:19,24 93:12 <b>accurate</b> 9:3 108:10 <b>actions</b> 75:6 <b>active</b> 10:20 <b>acts</b> 24:12 <b>Adams</b> 2:4 92:2,7 <b>additional</b> 104:25 <b>address</b> 5:16,17 6:2 6:6 <b>adjudicate</b> 53:13 <b>adjudicated</b> 21:8 42:17 <b>adjudication</b> 37:19 61:23 <b>adopted</b> 52:9 <b>advice</b> 98:23 <b>Affairs</b> 3:4 <b>affect</b> 9:6 <b>ago</b> 6:22 7:6,15 39:9 104:10 107:10 <b>agree</b> 15:7 26:10 28:15,17,20 32:10 46:15 47:8 50:13 62:17 74:10 88:7 88:7,12 <b>agreeable</b> 89:6 <b>agreed</b> 6:25 19:10 19:13,16 20:2,20 27:8 28:12 50:12	<b>Alex</b> 39:21 45:21 48:18 60:6 <b>align</b> 83:11 <b>alleged</b> 75:9 <b>allow</b> 24:3 50:5 <b>allowed</b> 46:17 47:10 <b>ambiguous</b> 81:23 <b>Amendment</b> 50:5 <b>American</b> 2:18 11:23 13:17,21 14:4 42:6,12 87:15 <b>AmeriCorps</b> 12:24 71:17 <b>and/or</b> 48:22 <b>Andrew</b> 2:3 3:8 5:11 47:2 49:13 <b>andrew.hughes...</b> 3:12 <b>Angeles</b> 2:20 3:4 <b>angry</b> 87:10,11 <b>ANNABELLE</b> 2:14 <b>answer</b> 8:24 9:12 9:12 14:12 15:21 17:9,11,15 22:19 46:21 62:24 65:5 66:6 70:9,13	<b>Apparently</b> 95:23 <b>appeared</b> 1:23 <b>apply</b> 24:14 <b>appreciate</b> 82:13 <b>approval</b> 75:22 76:5 <b>approved</b> 57:12,12 <b>approximately</b> 12:19 27:23 69:9 70:16 <b>April</b> 11:6 37:12 <b>area</b> 12:18 15:14 40:8 67:6,7 73:2 73:12 74:23 77:8 87:25 95:11 101:13 <b>article</b> 75:2,5 87:8 <b>articles</b> 45:18 74:16 <b>ASEEM</b> 2:9 <b>Asian</b> 82:23 <b>aside</b> 36:4,9 83:23 94:12 <b>asked</b> 45:20 51:10 54:21 55:21 83:9	<b>attorney-client</b> 17:13 46:20,25 64:24 96:21 98:20 <b>attorneys</b> 57:14,25 58:3 59:9,13,21 61:8 97:4,6 104:16 <b>Augustine</b> 38:12 <b>authorization</b> 50:16 62:1 <b>auto</b> 7:3,4 <b>available</b> 85:9 <b>Avenue</b> 3:10 5:19 6:7 51:16 <b>average</b> 72:8 <b>aware</b> 37:13,15 45:10,24 46:2,7 52:2,10 53:14,22 59:24 60:1,4,19 61:2 64:3,7 65:18	

87:16 88:17 90:10 104:7,8 <b>bell</b> 59:1 <b>Bellevue</b> 15:14 40:1 <b>Ben</b> 2:10 46:21 62:22 65:6 76:18 78:7 96:22 98:21 106:12 <b>Benancio</b> 1:4,20 4:1 5:4,15 35:5 76:13 108:8 <b>Benton</b> 36:16 91:22 92:1 <b>best</b> 47:23 67:21 68:2 74:3 84:10 84:15 99:12 107:5 107:5 108:10 <b>better</b> 69:18 70:25 73:3 <b>Bifurcate</b> 48:21 <b>big</b> 90:9,11 91:8,8 <b>bill</b> 105:23 <b>binder</b> 23:2,3 <b>Birch</b> 5:19 6:7 51:16 <b>bit</b> 6:8 9:19 14:5 16:18 21:5 45:9 59:12 65:16 66:8 67:4,5,24 75:14 83:9 84:5 92:12 93:18 95:2,4,7 101:10 <b>blue</b> 15:16 <b>board</b> 31:18 72:25 74:7 103:5 <b>boards</b> 32:6 <b>body</b> 83:4 <b>bodywork</b> 6:24 7:3 7:4 <b>books</b> 55:13 <b>border</b> 91:24 <b>born</b> 12:17 <b>bottom</b> 81:24 <b>boundaries</b> 24:1 41:24	<b>boundary</b> 22:23 23:17 <b>bounds</b> 97:12 <b>box</b> 55:19 <b>boxed</b> 93:7 100:7 100:11 <b>Brady</b> 37:14 <b>brand-new</b> 58:22 <b>break</b> 8:22,25 41:15,16 100:14 100:24 <b>brief</b> 27:12,12,15 28:5 55:11,11 <b>briefly</b> 5:11 <b>bring</b> 35:24 36:25 46:17 47:10 <b>bringing</b> 25:9 32:20 33:13 34:25 35:1,23 <b>brochure</b> 16:19,20 <b>broken</b> 83:6 <b>brother</b> 41:10 <b>brothers</b> 41:3,11 <b>brought</b> 19:24 32:21 47:16 59:18 60:4 65:3 78:11 95:22 <b>Building</b> 3:4 <b>burn</b> 6:8 <b>burned</b> 6:6 <b>business</b> 6:23 <b>busy</b> 30:14 55:15 84:7 85:2 <b>button</b> 62:20 66:3 <b>buy</b> 86:21	<b>called</b> 15:8,16 16:2 30:9,23 34:22 35:13,14 55:15 56:1 <b>calling</b> 44:6 55:6 <b>calls</b> 22:17 23:22 27:25 29:7 33:25 46:20 64:23 72:6 72:15 76:10 81:7 89:10,23 96:21 98:20 <b>campaign</b> 2:10,14 44:1 67:6 68:3,20 78:20 <b>campaigning</b> 35:25 37:6 44:3 73:17 <b>Campos</b> 40:17,18 40:19,22,25 41:8 41:10 45:21 46:16 47:10 60:7 63:23 <b>Canadian</b> 91:24 <b>candidate</b> 35:25 36:18 67:6,15,21 67:24 69:1 72:2 73:14 74:21 76:14 78:7 82:23 83:14 85:9 90:4 <b>candidates</b> 68:6,8 68:14 73:16 79:21 80:8,16 82:15 84:8 101:12,16 <b>capacity</b> 1:8,16 <b>car</b> 82:11 93:1 94:8 100:16 <b>care</b> 74:8 79:12 <b>career</b> 83:6 <b>case</b> 2:2,2,8 3:2,7 7:14 20:19 25:8 25:10 26:5 42:13 45:10,16 46:18 49:15,21 50:6,25 56:4 57:15 58:1 60:5,7,8 61:9,18 66:23 73:2 74:13 78:16 97:7 100:19	103:6 105:8,17 106:1 <b>cases</b> 19:22 <b>caught</b> 15:2 81:24 <b>CCR</b> 1:25 108:20 <b>cell</b> 48:7 50:11 58:21 <b>Center</b> 2:10,14,23 <b>central</b> 72:12 91:25 91:25 <b>certain</b> 6:25 <b>certainly</b> 32:11 37:20 53:8 79:24 99:22 <b>Certified</b> 108:6 <b>certify</b> 108:7 <b>chairman</b> 76:3 79:14 <b>chairmen</b> 36:25 79:15 <b>chairpersons</b> 79:15 <b>challenge</b> 103:4 <b>challenges</b> 29:24 78:21 88:8,9 <b>challenging</b> 34:14 65:24 <b>Chalmers</b> 2:4 <b>Chan</b> 82:19 <b>change</b> 25:6,9 31:7 42:23 43:1 77:23 81:21 <b>changed</b> 25:25 26:2 26:3,7,12 61:5,10 61:11 71:21 76:1 82:3 102:1,3 <b>changes</b> 41:1 <b>changing</b> 25:20,23 <b>chapter</b> 42:7 <b>charged</b> 103:18 <b>cheat</b> 87:13 <b>Chicago</b> 2:16 <b>choose</b> 11:18 13:24 84:1 <b>Cindy</b> 1:25 70:7,8 108:6,20	<b>circumstance</b> 82:10 89:3 <b>circumstances</b> 100:22 107:19 <b>Citizens</b> 13:21 42:6 <b>city</b> 24:3 <b>civics</b> 29:11,12,22 30:11 55:14 <b>civil</b> 34:1 42:11,11 56:6 77:24 <b>claim</b> 30:12 <b>claims</b> 46:17 47:11 <b>clarify</b> 8:14 51:13 56:12 91:14 <b>class</b> 72:9,20 <b>clear</b> 16:1 17:12 20:6 36:17 50:4 60:13 66:14 74:2 80:13 <b>clearly</b> 28:19 81:22 <b>client</b> 99:3 <b>clients</b> 62:4 <b>closer</b> 95:8 <b>clothing</b> 100:11 <b>Coalition</b> 31:19 <b>coffee</b> 99:22 <b>cognitive</b> 9:7 <b>colleagues</b> 85:22 <b>collect</b> 93:21 <b>college</b> 11:25 69:19 71:1 77:25 <b>Columbia</b> 92:1 <b>combat</b> 11:22 42:21 <b>come</b> 55:9 58:6 <b>comes</b> 74:19 <b>coming</b> 40:12 99:18 103:15,22 <b>comments</b> 17:4,21 17:24,24,25 18:11 <b>commission</b> 17:5 17:22 18:4,10,22 18:24 21:3 37:19 57:11 108:22 <b>commissioner</b> 52:4
--	---	---	--	--

52:5,6 <b>commissioners</b> 26:19,21 37:9,16 <b>committed</b> 78:22 <b>committee</b> 53:8 <b>common</b> 14:21 73:10,11 <b>communicate</b> 81:9 <b>communication</b> 17:13 46:20 54:5 64:6,24 98:20 99:2 <b>communications</b> 62:22 81:18 93:13 96:21 <b>communities</b> 73:9 <b>community</b> 13:3 23:25 24:9 40:13 71:24 72:4 84:22 102:18 <b>complaint</b> 10:11 18:7,19 19:2,4,9 19:12,15,21 20:1 20:4,16,16,17,19 20:22,23 21:4,10 21:12,17 23:5,9 23:13 25:10 26:9 26:11,15 33:9 57:2,5,6,9 61:16 61:20 62:16 66:12 83:17 94:11,15 97:24 104:2 <b>Complaints</b> 19:23 <b>complete</b> 53:9 89:15 <b>completely</b> 6:7 21:7 79:11 <b>completion</b> 48:2 61:22 <b>Complex</b> 3:10 <b>computer</b> 51:4 93:24 <b>concept</b> 57:12 <b>concerned</b> 31:20 32:9,15,16 33:1,3	34:1 35:20 55:4 67:2 81:16,17,18 103:2 <b>concerns</b> 31:11 81:11 95:15 <b>concluded</b> 107:21 <b>conclusion</b> 22:17 23:22 72:6 <b>conducted</b> 68:24 <b>conflict</b> 62:14 96:16,18 97:1,5 97:11,13,16 <b>conflicting</b> 61:16 <b>confused</b> 10:6 20:15 <b>confusion</b> 17:11 <b>congress</b> 11:8,14,18 18:1 24:2 28:2 31:8 34:14 47:23 56:8 67:8 71:14 91:9 <b>congressional</b> 11:12,13 12:7,16 67:22 69:10 70:17 74:4 76:14 77:3 77:10 78:6 82:20 85:4 86:1 91:15 92:14 93:15 102:4 <b>connect</b> 30:20 34:21 <b>connected</b> 78:10 <b>conservative</b> 84:13 84:14 <b>consideration</b> 33:13 34:25 <b>considering</b> 32:19 35:1 <b>constitution</b> 11:21 45:5 73:25 87:19 <b>construction</b> 86:25 <b>contact</b> 33:18 52:14 55:24 57:17 <b>contacted</b> 27:1 30:10,13 31:5 52:14	<b>contacting</b> 52:12 <b>content</b> 54:18 <b>continue</b> 101:24 <b>Continuing</b> 3:1 41:19 71:9 101:6 <b>controversy</b> 75:3 85:17 <b>conversation</b> 16:6 27:14,14,16,20 28:5,6 51:24 52:1 52:23 55:7,9,13 56:12 61:3 94:4 <b>conversations</b> 29:13,15,18 30:18 96:22 97:4 <b>cookie</b> 81:25 <b>coordinated</b> 77:7 <b>copy</b> 20:1,4 63:6,11 63:12 64:10,15 88:14 <b>core</b> 45:4 <b>correct</b> 11:14,15 16:13 29:3 30:9 30:24,25 31:2 43:19 45:11 46:9 46:10 49:14,16 57:10 59:8 60:9 60:11,18 61:6 62:5,6,9,10 66:18 67:9 68:5,11 75:8 75:8,13 79:7 97:25 <b>correctly</b> 53:2 82:8 <b>cost</b> 29:25,25 62:15 <b>counsel</b> 9:18 50:3 59:25 60:11 61:25 62:8,13 63:12 66:21,24 88:24 103:22 104:13 <b>counsel's</b> 89:1 <b>counterparts</b> 72:14 <b>counties</b> 22:22 25:17 26:8 <b>country</b> 13:3 42:9 42:21 71:23 83:2	87:17 <b>County</b> 5:20,23 26:6 31:19 36:16 74:13 82:19,21 91:19,22,23 92:7 94:16,17 95:5,12 101:13 108:4 <b>County's</b> 85:7 <b>couple</b> 51:14 87:7 101:8 104:25 105:2 106:8 <b>course</b> 6:15 63:14 65:9 97:20 106:9 <b>court</b> 1:1 7:23 8:2 43:4,16 50:5 56:14 60:2,11 70:11 107:12 108:6 <b>courts</b> 43:13,18 53:13 <b>covers</b> 91:19 <b>COVID</b> 102:1 103:4 <b>COVID's</b> 102:23 <b>created</b> 75:21 81:3 87:17 89:21 <b>critical</b> 14:4 25:7 <b>criticizing</b> 75:6 <b>cross</b> 22:21 <b>Crossclaim</b> 48:23 50:6 <b>CRR</b> 1:25 108:20 <b>Culp</b> 77:4 <b>Culp's</b> 80:17 <b>cultural</b> 14:19 <b>culture</b> 12:18 14:8 14:17 <b>current</b> 18:10 41:24 82:10 <b>currently</b> 36:1 51:15 106:20 <b>cut</b> 66:8 70:7	<b>damaged</b> 100:12 <b>Dan</b> 68:4 77:2 <b>date</b> 1:24 100:1 <b>day</b> 58:17 108:15 <b>DC</b> 2:12 <b>de-</b> 6:22 <b>deadline</b> 37:17 53:11 <b>deal</b> 7:1 <b>dealing</b> 56:8 100:21 <b>decide</b> 43:4 67:13 <b>decided</b> 33:20 71:13 82:3 85:13 <b>decision</b> 24:2 43:12 46:23 78:17,19 99:18,24 <b>defend</b> 36:20 <b>defendants</b> 1:10,18 2:2 3:7 45:25 48:18 49:18,21 59:15,22,25 60:6 60:19 61:19 <b>Defendants'</b> 48:20 <b>defended</b> 42:12 <b>defending</b> 45:6 <b>Defense</b> 2:18 <b>definitely</b> 82:13 <b>definition</b> 97:10 <b>delayed</b> 76:7,8 <b>Democrat</b> 80:24 <b>Democrats</b> 15:13 40:3 <b>demographic</b> 73:12 <b>dep</b> 20:12 <b>deposed</b> 6:18,22 <b>deposition</b> 1:19 4:1 7:13 9:16,17 10:4 10:9 19:22 20:5,6 20:12 46:5 51:11 54:2,13 60:17 63:7 64:11,18 65:4,10 86:15 98:18 107:21 108:8 <b>depositions</b> 60:21
--	---	---	---	---

<b>descent</b> 68:13	6:13 11:12,13	90:9	<b>Ellensburg</b> 80:6,6	<b>exactly</b> 7:6 33:22
<b>describe</b> 26:12	12:7,8,9,12,13,16	<b>Drew</b> 10:10 34:24	<b>else's</b> 20:17	34:7 35:18 80:10
<b>description</b> 25:11	21:19 22:8 23:16	35:16 46:23 57:16	<b>email</b> 18:12 81:10	80:16
<b>designated</b> 83:15	23:19 26:2,6,7	58:7 59:11 97:1	89:18 93:12,14,18	<b>EXAMINATION</b>
<b>desire</b> 60:21 69:21	31:8,16 36:15	<b>Drew's</b> 34:3,8	104:8	1:19 4:2,3
71:3	37:19 47:24 52:9	<b>drive</b> 99:25	<b>emails</b> 81:12 85:16	<b>examined</b> 5:6
<b>desires</b> 13:2 62:14	53:1,6 67:22 69:6	<b>dstokesbary@ch...</b>	85:16 104:5	<b>example</b> 33:9 54:3
<b>detail</b> 36:19	69:10,25 70:14,17	2:6	<b>endangered</b> 24:13	69:13 70:20 87:23
<b>details</b> 16:18	71:7 72:23 74:4,4	<b>due</b> 42:2,20	<b>ended</b> 7:2 33:22	<b>exchanged</b> 90:14
<b>determine</b> 42:17	75:1,23 76:14	<b>Dufault</b> 31:24,25	<b>endorsed</b> 85:24	<b>exclusively</b> 62:9
43:10,20 83:19	78:6 79:14 80:7	31:25 32:4,5,17	<b>endorsement</b> 34:15	<b>exhausted</b> 87:2
99:9	81:3 82:20 83:15	45:3	<b>ends</b> 28:3 84:15	<b>EXHIBIT</b> 4:9
<b>determined</b> 26:22	83:23 85:4 87:21	<b>duly</b> 5:5 108:9	<b>enforcement</b> 40:21	<b>exhibits</b> 4:10,11
<b>determining</b> 21:7	89:21 91:15 92:5	<b>Dupree</b> 31:8,23	41:5	<b>exist</b> 97:9
<b>difference</b> 12:19	92:10,13,13 94:13	<b>duration</b> 62:15	<b>engagement</b> 62:24	<b>existence</b> 97:15
13:3 40:12 71:22	95:14 106:20	<b>duty</b> 10:20	64:11,25	<b>expect</b> 81:25 82:9
71:25	107:1,2		<b>English</b> 75:22	<b>expectation</b> 62:7
<b>different</b> 19:25	<b>districted</b> 32:17	<b>E</b>	<b>enjoyed</b> 68:23	<b>expected</b> 9:25
22:22 25:18 33:5	<b>districts</b> 25:4 71:18	<b>E</b> 2:1,1 3:1,1 5:8	<b>enjoying</b> 11:7	<b>expecting</b> 52:15,17
61:21 91:2 102:6	72:24	41:19 50:21 71:9	<b>entertain</b> 79:24	<b>experience</b> 24:6,8
<b>difficult</b> 94:7	<b>Division</b> 3:10	101:6 105:3,3	<b>entity</b> 103:9,10	24:15 67:5 71:14
<b>difficulty</b> 48:8	<b>document</b> 48:4,8,9	106:10 108:1,1	<b>environmental</b>	72:11,18 87:22
<b>diligence</b> 42:20	48:14,25 49:1,3,6	<b>earlier</b> 14:5,15	24:12	101:11
<b>dinner</b> 39:8	49:7,25 87:17	45:20 96:11	<b>Ephrata</b> 40:8	<b>experiences</b> 14:8,17
<b>dis-</b> 39:14	<b>documents</b> 10:8	<b>early</b> 27:21	<b>ERICA</b> 3:9	14:19
<b>disagree</b> 78:3	86:15,17 87:6	<b>Ebony</b> 11:24 69:18	<b>erica.franklin@a...</b>	<b>expert</b> 105:7,13,17
<b>disconnect</b> 71:20	88:21 89:7 92:17	70:25 77:25	3:13	<b>expires</b> 108:22
<b>disconnection</b>	92:24 93:4 100:5	<b>economically</b> 72:19	<b>ERNEST</b> 2:17	<b>explain</b> 75:14 95:3
69:17 70:24	<b>dog</b> 90:4	<b>Eddie@MorfinL...</b>	<b>especially</b> 78:9	<b>explicable</b> 25:15
<b>discuss</b> 27:7 47:3	<b>doing</b> 9:20 18:4,24	2:24	<b>Espinoza</b> 16:12,14	<b>expressing</b> 52:25
52:12 64:25 85:22	19:1,21 20:5 34:6	<b>edge</b> 71:11	16:22 29:2,8,19	<b>expression</b> 83:11
96:22 103:23	74:3 90:1	<b>Educational</b> 2:18	30:9,23 34:22	<b>extent</b> 22:17 23:21
<b>discussed</b> 27:5	<b>dots</b> 30:20 34:21	<b>EDUARDO</b> 2:22	35:13 54:21 55:2	46:20 62:21 64:23
29:16 39:1 40:14	<b>doubt</b> 90:12	<b>effect</b> 43:8,9 102:23	<b>et</b> 1:12,17	72:5 96:20 98:19
41:7	<b>Dr</b> 105:5,13	<b>effort</b> 77:7 87:22	<b>evening</b> 88:17	<b>extraordinarily</b>
<b>discussion</b> 27:11	<b>Draft</b> 20:1	101:15	<b>event</b> 15:12,13	77:19
45:22 52:7 82:24	<b>drafting</b> 18:10	<b>eherrera@malde...</b>	39:25 40:2 75:15	<b>eyes</b> 96:9
<b>disheartened</b> 91:4	<b>drastic</b> 25:9	2:21	84:7 102:21	
<b>dismiss</b> 46:15,24	<b>drastically</b> 25:20	<b>either</b> 37:25	<b>events</b> 30:5	<b>F</b>
47:9 48:22 61:25	25:23 26:2,3,7,11	<b>elected</b> 102:5	<b>everybody</b> 73:21	<b>F</b> 105:3 108:1
<b>dismissed</b> 50:4	<b>drawing</b> 52:9 53:5	<b>election</b> 21:9 31:14	74:5	<b>face</b> 34:17 37:22
<b>displeased</b> 87:12	53:8	33:1 77:4 81:7	<b>Everything's</b> 65:17	<b>faced</b> 82:15
<b>distinguishing</b> 95:1	<b>drawn</b> 22:15,24	<b>elections</b> 25:25	<b>evidence</b> 53:18	<b>facilities</b> 23:25
96:4	52:12	106:15,17 107:2	66:4 89:16	24:10
<b>district</b> 1:1,2 6:11	<b>dream</b> 11:23 87:15	<b>electoral</b> 87:24	<b>exact</b> 33:11	<b>fact</b> 15:1 31:11
		<b>electronic</b> 93:13		42:2 44:24 45:2,4

47:16 53:5 54:9 77:14,16 79:24 84:23 85:14 87:12 89:10 <b>facts</b> 80:13 <b>Fain</b> 26:23 <b>fair</b> 10:7,12 12:2,4 12:6,10,13 23:10 25:25 32:16 37:7 73:24 78:5 87:13 99:16 <b>fairly</b> 69:6 70:13 <b>falls</b> 97:16 <b>familiar</b> 38:3,3 42:7 <b>familiarity</b> 24:5 67:7 <b>familiarized</b> 24:11 <b>families</b> 12:22 <b>family</b> 40:18 41:4 87:2 99:19 100:10 <b>fantastic</b> 13:5 <b>far</b> 36:14 70:9 87:6 102:13 106:23 <b>favor</b> 65:24 66:17 <b>favorable</b> 81:8 <b>favored</b> 77:2 <b>fearful</b> 103:2 <b>February</b> 1:24 5:1 27:23 108:9,15 <b>federal</b> 10:25 11:1 11:4,9,14 12:21 23:24 24:1,9,13 71:16 83:5 <b>feel</b> 8:22 10:1 12:14 36:20 42:13,15 43:1 60:12 66:1 71:20 78:1,3 <b>feeling</b> 102:2 <b>feelings</b> 42:9 <b>feet</b> 68:2 <b>fellow</b> 67:15 <b>felt</b> 7:1 42:9 67:16 67:20 <b>fields</b> 40:10	<b>Fifth</b> 3:10 <b>fight</b> 80:2 83:8 90:4 <b>fighter</b> 80:2 90:11 <b>fighting</b> 36:1 90:9 <b>file</b> 54:15,17 <b>filed</b> 18:7,19 19:6,6 20:2 21:12,16 57:2,5 61:17,17 61:21 66:12 97:21 97:24 99:12 104:2 <b>filing</b> 97:23 98:4 <b>final</b> 21:3,4,11,13 21:14,16,21 22:1 22:2 <b>finalize</b> 37:18 <b>finally</b> 76:6 <b>find</b> 62:20 68:21 71:12 78:16 93:8 102:18 107:19 <b>findings</b> 43:19 <b>finds</b> 43:16 <b>fine</b> 41:17 44:10,16 84:8 <b>finish</b> 50:14 60:14 <b>fire</b> 5:24 6:8,16 33:24 51:17,19 53:16,23 87:4 89:3 <b>firm</b> 2:22 58:14 64:1 <b>first</b> 5:5 20:22 21:2 21:10,22,25 28:8 29:4 30:7,23 33:20 39:24 55:23 59:21 60:17,24 61:7 66:14,18,21 67:10 75:16 87:18 88:15 96:12 <b>fit</b> 25:10 <b>five</b> 5:24 39:9 54:20 56:8 68:9 75:16 79:18 87:1 93:7 100:7 104:10 <b>five-minute</b> 55:7 100:14,24	<b>fix</b> 83:1,2 <b>fixed</b> 87:5 <b>flat-out</b> 28:15,17 <b>flipping</b> 23:3 <b>Floor</b> 2:19 <b>focused</b> 85:1 <b>folks</b> 71:15 81:15 <b>follow</b> 16:24 <b>followed</b> 71:12 <b>following</b> 45:5 <b>follows</b> 5:7 <b>foolish</b> 10:18 <b>Force</b> 90:15 <b>foregoing</b> 108:8 <b>forgetting</b> 16:11 <b>form</b> 14:9 15:19 17:6,8 18:17 54:23 88:3 95:16 101:17,18 103:17 104:17 107:11 <b>former</b> 41:5 <b>forward</b> 60:5,7 61:18 105:17 <b>fought</b> 13:17 <b>found</b> 34:4 76:16 78:20 82:1 85:24 90:25 <b>founded</b> 13:13,22 <b>Fourth</b> 50:5 <b>framers</b> 87:16 <b>Franklin</b> 3:9 92:2 94:17 <b>FRCP</b> 107:23 108:13 <b>free</b> 8:23 13:18 62:15 73:5 <b>freedoms</b> 43:15 <b>freestyling</b> 97:15 <b>freeway</b> 22:22 23:17 <b>freeze</b> 35:2 <b>frequently</b> 97:21 <b>Friday</b> 98:2 <b>friend</b> 15:3,24 102:5	<b>friends</b> 85:22 <b>front</b> 23:4 57:21 99:21,22 <b>froze</b> 35:11 <b>frozen</b> 35:2,4 70:2 <b>fruition</b> 61:22 <b>full</b> 9:3 <b>fully</b> 34:21 <b>function</b> 9:7 <b>Fund</b> 2:18 <b>funding</b> 103:22 <b>funds</b> 76:22,23 <b>further</b> 94:17 104:24 107:17 <b>future</b> 106:17 107:2 <b>fuzzy</b> 57:20 65:17 94:18 96:4,6 <hr/> <b>G</b> <hr/> <b>Gaber</b> 2:9 4:5 50:20,22,24 53:21 54:7 55:1 63:1,5,8 63:11,16 65:1,8 66:5 70:2,6 71:10 72:10 73:1 88:5 95:24 97:2,17,19 98:22 99:4 100:13 101:7,19 103:19 104:18,24 107:11 107:17 <b>Garcia</b> 1:4,20 4:1 5:4,10,15 6:18 9:2 9:15 10:13,19 11:19 14:22 15:21 17:9,21 19:9 20:7 20:20 23:2 26:1 26:18 30:19 31:23 32:13 35:10 37:8 41:21 43:6,23 47:8 48:15 50:4 50:23 62:22 64:10 64:24 65:2,18 70:8 71:12 76:14 87:9 88:6 97:3 99:5 101:9 105:5	107:18 108:9 <b>Garden</b> 39:9 <b>gather</b> 65:23 67:1 72:2 96:15 <b>gathered</b> 83:10 <b>gears</b> 45:9 67:4 <b>general</b> 3:9 36:18 76:13 80:19 106:14 <b>generality</b> 36:20 <b>generally</b> 57:1 <b>geographic</b> 94:15 95:15 <b>geographical</b> 25:14 <b>ger-</b> 42:19 <b>gerry-</b> 42:2 <b>gerrymander</b> 52:13 53:1 54:10 94:13 <b>gerrymandered</b> 22:14 23:19 44:25 <b>gerrymandering</b> 15:6 22:7,11,12 24:7,16 25:21 27:9 28:10 29:20 30:8,12 32:23 33:6 35:21 42:3 42:20 43:12 44:23 46:17 47:10,17 <b>getting</b> 14:2 16:21 29:22 33:23 79:20 93:15 94:1 101:12 102:15 <b>give</b> 9:3 18:1 22:20 33:17 55:18 80:22 81:4 83:5 99:25 100:1 102:7 <b>given</b> 27:4 28:24 52:19 58:8 66:20 81:19 89:3 91:1 <b>gives</b> 37:21 <b>glad</b> 87:1 <b>glasses</b> 48:8 57:20 57:21 58:22 65:11 65:15 94:19 95:21 95:21
---	---	--	---	---



<p><b>go</b> 7:5,11,11,20,21 8:18 13:11 17:15 25:5 26:23 31:13 35:6 37:18 38:19 38:21 42:14 43:18 43:19 47:15 53:9 56:23 61:20 66:6 67:21 68:1 69:14 70:4,21 79:10,12 80:21,24 81:4 83:19 86:21 88:6 95:10 98:10 102:10</p> <p><b>goal</b> 42:16,17 43:6 43:10,14 81:6</p> <p><b>God</b> 77:21</p> <p><b>goes</b> 40:22,25 43:3 97:11</p> <p><b>going</b> 21:7,19 24:24 25:5,17 31:13 35:20 46:5,19,22 47:13,21 48:4 55:13 56:7 60:14 62:20,23,23 64:22 68:1 85:13 86:25 93:6,17 94:9,21 96:20 98:20 99:1 99:12,20 100:5,8 100:20 102:10</p> <p><b>good</b> 5:10 14:2 32:10,12 41:14 63:5 66:7,9,10 82:22 84:15</p> <p><b>goodness</b> 6:3 21:23 99:21</p> <p><b>Gordon</b> 64:8</p> <p><b>gosh</b> 6:1,9 15:10 80:7</p> <p><b>gotten</b> 42:6 69:18 70:25</p> <p><b>governing</b> 24:22</p> <p><b>government</b> 10:25 11:2,5,9 12:21 23:24 24:1,9 71:16</p>	<p><b>Governor</b> 42:11</p> <p><b>Grandview</b> 5:19 6:4 51:16</p> <p><b>Granger</b> 12:25 13:23 38:25 39:15</p> <p><b>Grant</b> 91:23 92:2</p> <p><b>Graves</b> 26:25 27:3 27:4,5 28:10,25 31:1,4 32:3 33:10 33:13,17 34:22,23 35:14,14 51:25 52:8 53:14,22 54:1,8 55:3,6 56:13</p> <p><b>Graves'</b> 52:3 53:18 53:25</p> <p><b>greatest</b> 87:17,17</p> <p><b>greatly</b> 76:7 77:4 103:1</p> <p><b>grew</b> 12:17 38:22</p> <p><b>GRH</b> 71:17</p> <p><b>growing</b> 24:5</p> <p><b>guess</b> 6:5 19:25 21:15 70:6 90:9 97:15</p> <p><b>guest</b> 40:4</p> <p><b>guidelines</b> 7:20 90:9</p> <hr/> <p style="text-align: center;"><b>H</b></p> <hr/> <p><b>H</b> 105:3</p> <p><b>half</b> 95:5 100:8</p> <p><b>halfway</b> 37:10</p> <p><b>hand</b> 29:10 81:24 84:6 108:14</p> <p><b>hands</b> 40:7 79:23</p> <p><b>hang</b> 49:11</p> <p><b>happen</b> 43:17 63:18 83:21</p> <p><b>happened</b> 30:23 31:4 35:13 79:6 79:16 80:4,20 82:20 107:9</p> <p><b>happening</b> 16:25 31:16,20 33:2 56:10 82:12</p>	<p><b>hard</b> 26:12 33:7 51:10 90:6,7</p> <p><b>HARLESS</b> 2:14</p> <p><b>harmed</b> 41:23 42:3</p> <p><b>head</b> 8:1 88:7</p> <p><b>health</b> 103:2</p> <p><b>hear</b> 6:9 18:3 40:9 41:13 53:19 80:3 107:12</p> <p><b>heard</b> 26:1 34:13 34:15 36:3 40:4 66:19 78:3 104:12</p> <p><b>heart</b> 13:2</p> <p><b>heavily</b> 53:5,7</p> <p><b>Hello</b> 62:25</p> <p><b>help</b> 13:14 75:19,25</p> <p><b>helped</b> 53:23 67:15</p> <p><b>helping</b> 102:5</p> <p><b>Herald</b> 15:3,15 21:6 24:25 25:2 74:16</p> <p><b>Herald's</b> 37:16</p> <p><b>hereunto</b> 108:14</p> <p><b>HERRERA</b> 2:17</p> <p><b>hey</b> 62:19 80:24 101:23 106:12</p> <p><b>high</b> 12:25 72:21</p> <p><b>highlight</b> 50:8</p> <p><b>highlighting</b> 50:3</p> <p><b>highway</b> 25:19 26:5</p> <p><b>hire</b> 76:23</p> <p><b>hired</b> 76:25</p> <p><b>Hispanic</b> 12:1 13:7 13:9 22:25 42:8 69:20 71:2</p> <p><b>history</b> 11:24 14:2 79:20 84:12</p> <p><b>hitting</b> 25:19</p> <p><b>Hobbs</b> 1:7,16 10:11 19:24 20:7,20 45:10,16 47:11</p> <p><b>Hold</b> 96:19,19</p> <p><b>holder</b> 99:6</p> <p><b>holds</b> 102:9</p> <p><b>Holt</b> 59:1 64:2</p>	<p><b>Holtzman</b> 58:14 64:1</p> <p><b>holy</b> 87:18</p> <p><b>home</b> 23:24 40:12 51:3,17 79:11 86:23 87:1</p> <p><b>homeowner</b> 12:23</p> <p><b>homeowners</b> 12:20 71:16</p> <p><b>honest</b> 34:2,7 37:4 57:16 60:13 82:2 84:25 90:8 92:23</p> <p><b>honestly</b> 99:19</p> <p><b>honesty</b> 82:4</p> <p><b>Honeyford</b> 39:25 84:21 85:12,13</p> <p><b>honor</b> 7:1 44:6</p> <p><b>hope</b> 51:5 68:21 93:23</p> <p><b>hopefully</b> 7:21 43:3 90:4 100:25 102:9</p> <p><b>hoping</b> 55:18,19</p> <p><b>host</b> 93:22</p> <p><b>hours</b> 12:24 78:22</p> <p><b>house</b> 5:24 6:6,16 33:24 69:12,14 70:19,21 86:19 87:3 88:20 89:4 93:25</p> <p><b>households</b> 12:20</p> <p><b>Hughes</b> 3:8 4:4,6 5:9,11 14:11 15:20 17:7,17 18:20 22:18 24:18 35:6,9 41:14,20 46:22 47:5,7 50:18 51:10 53:17 53:24 59:12 61:4 83:9 96:13,25 97:11 101:1,17 104:25 105:2,4,12 105:20 106:5,9</p> <p><b>Hughes'</b> 59:20</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/> <p><b>idea</b> 67:23</p>	<p><b>ideal</b> 100:21</p> <p><b>identification</b> 4:10 4:11</p> <p><b>identified</b> 84:18</p> <p><b>ideology</b> 84:23</p> <p><b>III</b> 1:4,20 4:1 5:4 5:15 108:9</p> <p><b>IL</b> 2:16</p> <p><b>illegal</b> 15:6 22:11 24:7 35:20 42:2 42:19 44:22</p> <p><b>illegally</b> 43:12 44:24 83:15</p> <p><b>imagine</b> 28:4</p> <p><b>impact</b> 78:25</p> <p><b>important</b> 13:17 14:6,15,18,20 25:6 47:20,22,24 74:9</p> <p><b>impossible</b> 107:8</p> <p><b>impression</b> 15:22 18:25 22:3 51:2 54:14,16,18 72:3 73:16 74:11</p> <p><b>impressive</b> 77:20</p> <p><b>includes</b> 91:22</p> <p><b>including</b> 68:9 69:2</p> <p><b>inclusion</b> 74:6</p> <p><b>income</b> 72:20</p> <p><b>incumbent</b> 68:3</p> <p><b>INDEX</b> 4:2,9</p> <p><b>indicated</b> 23:18</p> <p><b>individual</b> 44:23</p> <p><b>individuals</b> 59:14</p> <p><b>information</b> 9:23 33:18 103:14,20</p> <p><b>initial</b> 55:12</p> <p><b>initially</b> 61:17,21</p> <p><b>ink</b> 86:21</p> <p><b>instruct</b> 46:21 98:21</p> <p><b>instructions</b> 55:17</p> <p><b>intend</b> 51:22 106:17,23 107:1</p> <p><b>intentions</b> 32:12</p>
---	---	--	---	---

<b>interest</b> 74:3 99:12	<b>Joe</b> 26:23	57:16,25 58:15	<b>Koch</b> 1:25 108:6,20	32:20,21 33:14
<b>interested</b> 16:17,19	<b>Jose</b> 38:14 39:10	61:17 63:3 64:6		35:1,1,15,23 36:6
55:14	45:20 48:18 60:6	65:20,21,22 68:2	<b>L</b>	42:16 43:6,10
<b>interests</b> 47:24 62:4	<b>JUNE</b> 108:23	69:13,15,16 70:7	<b>lack</b> 23:17 72:3	46:16,24 47:9,16
62:13		70:20,22,23 72:17	81:18	47:21,25 53:16,23
<b>interrupt</b> 98:10	<b>K</b>	72:18,19,22 73:4	<b>land-</b> 26:4	54:15 59:15,22
<b>interruption</b> 17:19	<b>Kaufman</b> 2:4	73:5,7,21,22 74:4	<b>landmark</b> 25:19	60:1 61:25 66:22
17:19	<b>KDNA</b> 39:14,17	74:7,17 77:14,18	26:4	78:4 97:21,23
<b>intervened</b> 45:25	<b>keep</b> 44:18 96:8	77:21 78:4,8,20	<b>language</b> 33:12	98:5 99:13 103:16
59:14	103:18	79:15,17,19 80:2	91:11	<b>lawsuits</b> 39:4
<b>intervening</b> 60:6,6	<b>Kennewick</b> 2:23	80:9,10,12,12,14	<b>laptop</b> 9:25	<b>lawyer</b> 18:8 20:24
61:18	<b>kind</b> 26:12 95:3	80:15,18,19 81:1	<b>large</b> 22:24 41:3	34:10 47:4 49:15
<b>intervenor</b> 2:2	101:16 103:21	81:1,7,13,14,15	69:6 70:13 72:19	64:14 83:16
48:20 49:18,21	<b>King</b> 82:19,21	81:16,23,25 82:4	73:21 74:17,20	103:23
59:22,25 60:19	<b>Klickitat</b> 92:1	82:16,24,24 83:3	85:7	<b>lawyers</b> 90:7 103:6
<b>interveners</b> 61:8	<b>knew</b> 39:24 55:15	83:4,7,14,17,24	<b>largely</b> 12:7	<b>lay</b> 24:21
96:13	55:18	84:3,9,9,10,13,17	<b>larger</b> 91:15	<b>LD</b> 28:9 32:17
<b>Interveners'</b> 48:22	<b>know</b> 5:10 7:19,20	84:19,19,25 86:1	<b>largest</b> 69:7,8 70:14	41:24
50:3,5	12:23 15:2,9,22	86:5,5,20,22 87:1	70:15 85:4 91:16	<b>leadership</b> 12:9
<b>involved</b> 14:22,24	15:25 16:3,4,4	87:2,3,6,7,10,14	91:18	25:24 31:7 73:23
16:5 53:5,7,15	17:23,24 19:23	87:16 89:5,9,10	<b>late</b> 98:3	91:5
67:13,24 75:18	20:12,16 21:4,8	89:11,14,15,16	<b>Latin</b> 13:21 42:6	<b>leads</b> 13:2
100:19 101:25	21:14 23:12 25:1	90:2,5,6,8,8,20	<b>Latino</b> 12:10 13:14	<b>learn</b> 67:25
102:4,19,19	25:6,7,18 26:10	91:3,4,6,7,8,10,14	14:1 39:18 68:10	<b>learned</b> 59:21
<b>involvement</b> 52:4	26:11,13,18,20,23	91:14 92:4,25	68:13 69:2 72:4	66:20
<b>involves</b> 17:12	26:25 27:3,24	93:6,8,9,17,17,19	72:12 73:9,15,18	<b>learning</b> 60:16,24
<b>Iraq</b> 7:8	28:5,20 29:23,25	93:24 94:3,7,16	73:21,22 74:12,18	61:7 66:15
<b>irregardless</b> 32:25	30:2,17 31:6,9,17	94:19 95:17 96:12	74:23 75:10,17,23	<b>leave</b> 79:23 82:3
83:14,18	31:17,19,21 32:6	99:20 100:9,10,18	76:20 77:1,5,8	<b>left</b> 11:8 82:6
<b>Ismael</b> 40:17 45:21	33:8,8,19,22,24	100:22,23 101:21	79:5 80:3 82:15	<b>legal</b> 2:10,14,18
48:18 63:23	34:1,5,9,12,16,17	101:22,23 102:3	85:23 87:23,24	13:21 19:23 22:8
<b>issue</b> 81:10 85:22	35:18,24 36:11,15	102:13,14,17,21	88:10 89:19,22	22:17 23:13,22
<b>issues</b> 21:6 53:9	36:22,24 37:2,3,5	103:1,3,7,11,13	90:15,18 91:6	62:10 64:19 66:24
95:19	37:12,14,20,22	103:15,15,15,21	94:5	72:6 79:25 98:23
<b>item</b> 84:8	38:2,12,14,16,23	103:21,21,24	<b>Latino-based</b> 12:8	99:20
	39:10,15,16,21,23	104:15,20,23	<b>Latinos</b> 69:8 70:15	<b>legislative</b> 6:11,13
<b>J</b>	40:2,8,10,17,19	105:5,15,16,16,22	75:17 76:25 79:18	18:10 26:2 92:13
<b>January</b> 27:23	41:4,4,10,11 42:5	105:25 106:24	<b>law</b> 2:22 37:21	107:2
46:13	42:10,18 43:3,23	<b>knowing</b> 20:14	40:21 41:5 53:12	<b>legislator</b> 66:16
<b>jar</b> 81:25	43:24,25 44:2,11	42:7 57:19	58:14 64:1	<b>legislature</b> 65:19
<b>Jason</b> 64:4	44:16 45:14 46:23	<b>knowledge</b> 81:5	<b>laws</b> 12:3,5 24:14	66:16 84:2 101:13
<b>Jeremie</b> 31:7,9,17	51:13 52:3,8,17	82:22 107:6	24:14,20,22	<b>let's</b> 100:24
31:18,23,24,25	52:19 53:8 54:1,2	108:10	<b>lawsuit</b> 14:23,24	<b>letter</b> 23:13 64:11
32:17,25 45:3	54:3,5,12,20,21	<b>known</b> 14:25 34:16	15:17 16:2,15	79:13,13,14 104:7
<b>Jim</b> 37:2 84:20	55:2,10,12,18,20	38:17,24 52:1	19:6,10 26:16	<b>letters</b> 104:5
<b>job</b> 84:15,15	56:3,6,8,16 57:16		29:20 30:8,21	

<b>letting</b> 27:14	<b>look</b> 26:5,9 36:14	94:6	44:2 50:23 57:18	53:24 66:3 105:10
<b>life</b> 11:24 13:1 14:7	46:3,5 49:24	<b>manner</b> 79:25	87:4	105:18
14:17 77:16 82:4	53:10 58:22 72:22	<b>manners</b> 67:18	<b>meeting</b> 84:20	<b>mistake</b> 77:10 91:8
<b>lifelong</b> 71:24	72:23 74:15 80:25	<b>map</b> 22:24 25:12	<b>meetings</b> 9:18	<b>mistakes</b> 77:10
<b>lifetime</b> 23:23 24:8	80:25 92:16 93:8	42:23 43:1,7,7,8	18:21 36:25 85:3	<b>misunderstanding</b>
<b>light</b> 17:19 53:23	<b>looked</b> 28:16 31:15	43:20 56:13,15	102:15	51:2 54:3 77:12
61:21	33:11 46:4 76:12	57:12,12 60:22	<b>Mel</b> 40:22,25	77:13 86:3 89:25
<b>lighting</b> 53:15	92:17 93:3,4	61:5,9,11 63:18	<b>member</b> 13:19 76:2	<b>mixing</b> 41:2
<b>lightly</b> 83:6	95:14	92:13 94:23 95:12	76:17 79:1 82:6	<b>moment</b> 22:20 34:3
<b>liked</b> 83:7	<b>looking</b> 15:17 31:6	96:2	91:7	63:2 70:4 85:24
<b>limit</b> 37:21	31:15 32:2,22	<b>maps</b> 17:5 21:3,4,7	<b>memory</b> 9:6 28:8	90:25 94:10 102:7
<b>line</b> 66:13 81:24	<b>looks</b> 24:16 25:12	21:11,13,15,16,21	<b>mentioned</b> 13:6,19	<b>Monday</b> 86:11 98:2
84:8	<b>Los</b> 2:20 3:4	22:1,2,3,10,13,21	23:18 24:20 25:3	98:2
<b>lines</b> 15:2,4 68:25	<b>lose</b> 33:1	23:23	39:25 51:24 85:15	<b>money</b> 29:25 93:19
94:25 95:2 96:4	<b>lot</b> 21:6 25:21	<b>March</b> 18:5 57:7	96:13 104:2	103:22 104:21
<b>list</b> 24:13	27:24 28:2 31:11	<b>Mark</b> 2:9 50:19,24	<b>message</b> 75:21 76:1	<b>money's</b> 103:15
<b>litigation</b> 3:10	33:24 35:19 36:7	62:19 96:19 105:5	76:11,13 78:13,18	<b>Monroe</b> 2:15
29:16 42:11,12	36:21,23,23 37:3	105:13	91:2,3	<b>month</b> 57:1 100:8
46:1,8 53:15 60:3	37:3 38:6 40:2,3	<b>marked</b> 4:11	<b>messages</b> 75:3	<b>months</b> 57:2 76:7
60:21	44:2 53:9 56:5,10	<b>mass</b> 77:18	81:10 85:21 89:8	104:10,10,11
<b>little</b> 9:19 16:7,18	73:6 80:5 86:19	<b>materials</b> 68:20	90:13 93:11	107:9
16:23 25:17 45:9	95:18 101:22	<b>Mattawa's</b> 92:9	<b>messaging</b> 76:8	<b>months'</b> 104:13
52:18,21 57:20	<b>low</b> 102:11	<b>matter</b> 5:12 7:13	<b>Messrs</b> 45:24 46:16	<b>Morfin</b> 2:22,22
59:12 65:16,17	<b>lower</b> 72:9,13,20	13:16 19:15 20:2	47:9	<b>morning</b> 5:10
66:8 67:4,5 75:14	73:5,8 74:12,22	20:3,7,9 77:14	<b>met</b> 5:10 15:9,11,23	99:16
87:2 90:9,11 91:2	74:23,24	78:1 83:18	15:24 39:11,13,22	<b>Motion</b> 48:21
92:3 93:18 94:18	<b>LULAC</b> 11:25	<b>matters</b> 33:11	40:1,6 44:2,10	<b>mountains</b> 12:12
95:2,4,7 101:10	13:19,20,24 25:9	79:12	57:17	38:5,7,8
<b>live</b> 6:13 30:3 88:10	33:9 39:16 42:5,8	<b>mayor</b> 38:25 39:15	<b>Mexican</b> 2:18	<b>move</b> 31:12 60:5
106:20	69:19 71:1	<b>mean</b> 12:4 19:4,23	<b>mgaber@campai...</b>	86:23
<b>lived</b> 6:15	<b>lunch</b> 73:5	25:14 26:9,21	2:13	<b>moved</b> 5:22,24
<b>lives</b> 83:3 102:23		27:13 28:15,18	<b>midyear</b> 81:7	51:14 61:18 86:18
<b>living</b> 10:13 72:1	<b>M</b>	31:9,24 33:8	<b>military</b> 6:23 7:7	87:1
<b>LLC</b> 2:4	<b>M</b> 1:25 5:8 41:19	36:14,21 38:4	10:15,17,19,20,23	<b>moves</b> 93:7
<b>loans</b> 23:24 24:3	50:21 71:9 101:6	45:12,14 46:3	31:10 83:1	<b>moving</b> 6:16 21:20
71:15	105:3 106:10	52:7 55:7,11 56:5	<b>mind</b> 5:13 43:22	56:8 60:7 100:7
<b>local</b> 24:13	108:6,20	59:19 64:5 69:5	<b>Mingle</b> 69:15 70:22	<b>MULJI</b> 2:9
<b>location</b> 9:25 21:20	<b>Maia</b> 16:12 29:1,2	69:18 70:12,25	<b>minimal</b> 81:6	<b>multiple</b> 29:18
23:12 100:1	30:8,23 34:21	84:5 93:5 95:9,19	<b>minority</b> 69:6	<b>mute</b> 62:20 66:3
<b>locations</b> 56:9	35:13 40:1 52:19	96:6 97:24 98:10	70:13	
<b>long</b> 7:5,6,15 8:21	55:10	<b>meaning</b> 12:6	<b>minute</b> 54:6 89:17	<b>N</b>
10:19 30:4 82:24	<b>mail</b> 104:6	<b>meant</b> 95:22	<b>minutes</b> 27:6 54:20	<b>N</b> 2:1 3:1 5:8,8
84:17,20	<b>Main</b> 2:4	<b>mechanism</b> 56:2	<b>missing</b> 70:1 71:8	41:19,19 50:21,21
<b>longer</b> 21:19 45:3	<b>making</b> 25:24	<b>medications</b> 9:5	<b>misspoke</b> 47:6	71:9,9 101:6,6
72:8 77:2 100:17	46:23 71:24	<b>meet</b> 25:5 37:4,17	<b>misstates</b> 53:17,18	105:3,3 106:10,10
	<b>Manice</b> 82:7 90:25			<b>name</b> 5:13 13:6

<p>15:10,11 16:11 34:17 37:22 50:23 57:19 58:16,19,22 <b>names</b> 41:11 58:10 <b>NASA</b> 40:11 <b>nation</b> 75:17 79:18 <b>national</b> 12:1 13:9 13:11 69:20 71:2 103:11 <b>necessarily</b> 46:25 83:13 <b>necessary</b> 100:23 <b>need</b> 7:23 8:22 9:12 17:11 20:18 34:20 69:12 70:19 78:8 86:18,21 89:2 90:10 92:16 93:16 96:8 100:17 101:24 102:7 <b>needed</b> 6:24 23:12 51:3 <b>negatively</b> 88:9 <b>NEPA</b> 24:11 <b>never</b> 37:25 43:22 49:7 50:12,13 105:7,13,23 <b>nevertheless</b> 54:9 <b>new</b> 21:20 43:8 50:11 <b>Newhouse</b> 68:4 77:2 <b>news</b> 45:18 50:11 59:16,19,23 74:16 87:8 <b>newspaper</b> 31:12 53:10 75:2 81:23 <b>newspapers</b> 81:13 85:17 <b>nice</b> 40:5 44:11,17 50:23 51:6 <b>Nikki</b> 43:23 <b>nodding</b> 8:1 <b>non-</b> 12:24 <b>nonprofit</b> 10:24 <b>normal</b> 63:13 103:3</p>	<p><b>North</b> 2:23 <b>NOS</b> 3:7 <b>notice</b> 20:12 58:8 81:19 <b>November</b> 18:5 57:11 <b>nowadays</b> 102:6 <b>number</b> 12:10 27:4 28:24,25 29:24 34:3,8 38:17,24 52:19 56:3 68:8 76:22 85:1 <b>numbers</b> 74:20 81:4 102:21 <b>NW</b> 2:11</p> <hr/> <p style="text-align: center;"><b>O</b></p> <hr/> <p><b>O</b> 5:8 41:19 50:21 71:9 101:6 105:3 106:10 <b>o0o-</b> 5:3 107:24 <b>oath</b> 5:5 8:10 <b>object</b> 9:9 46:19 53:17 62:21 64:23 96:20 99:1 101:17 107:11 <b>objection</b> 14:9 15:19 17:6,8 18:16 22:16 23:21 53:24 54:23 66:3 72:5,15 88:1 95:16 98:25 101:18 103:17 104:17 105:10,18 107:13 <b>objections</b> 9:10 18:18 <b>observations</b> 101:14 <b>obviously</b> 25:4 36:3 49:22 53:7 54:5 81:2,2 <b>occur</b> 48:1 81:21,21 85:25 87:12 <b>occurred</b> 19:8 25:22 35:21 79:16</p>	<p>80:1,13 82:23 87:3 <b>occurring</b> 47:18 <b>off-line</b> 82:8 <b>offensive</b> 68:21 <b>offhand</b> 57:19 <b>office</b> 10:6 55:17 67:11 99:20 <b>officer</b> 38:23 <b>official</b> 1:7,16 <b>officials</b> 36:11 <b>oftentimes</b> 72:13 <b>oh</b> 6:3,7 7:6 13:11 21:23 23:11 28:19 38:22 42:14 47:15 57:8 64:15 65:7 80:7 99:21 101:21 <b>Okanogan</b> 91:25 92:2 <b>okay</b> 6:5,18 7:9,18 8:16,19,25 9:9,15 10:16 12:14 19:12 20:9,14 21:2 23:8 29:4 32:8,13 38:14 39:19 42:4 44:6,8 45:20 46:13 47:13 48:9 48:14 49:7,10,24 50:18 52:20 56:14 56:18 57:14,23 58:6,18 59:3 62:23 63:15 67:4 67:7 73:8 74:25 86:13 90:19,21 92:22 94:2,14 95:10,25 96:5,8 100:13,14 101:21 102:13 107:15 <b>old</b> 12:25 <b>old-school</b> 57:21 <b>oldest</b> 42:8 <b>Olive</b> 39:9 <b>Olmstead</b> 6:4 <b>once</b> 15:23,25 21:4 27:1 50:4 66:2</p>	<p>99:17 100:3 <b>one's</b> 106:3 <b>ones</b> 26:21 60:7 85:24 <b>open</b> 23:2 40:2 <b>operates</b> 101:11 <b>opinion</b> 22:8,9 24:17 25:22 33:4 54:11 <b>opportunity</b> 87:24 <b>opposite</b> 61:21 62:4 96:14 <b>Opposition</b> 48:21 <b>option</b> 84:10 <b>ORAL</b> 1:19 <b>order</b> 30:5 37:18 63:12 <b>organization</b> 13:7 14:1 16:8 42:8 103:11,12 <b>organizations</b> 91:10 <b>organized</b> 13:14 <b>original</b> 43:2 <b>originally</b> 43:2 <b>OSPI</b> 16:11 55:16 <b>Othello</b> 92:7 <b>outcome</b> 59:25 77:5 <b>outer</b> 97:12 <b>overall</b> 69:24 71:6 74:24 <b>overcome</b> 78:23 <b>overlap</b> 92:12 <b>Owens</b> 105:5,14</p> <hr/> <p style="text-align: center;"><b>P</b></p> <hr/> <p><b>P</b> 2:1,1,9 3:1,1 <b>p.m</b> 101:5 107:21 <b>Pablo</b> 41:10 <b>packed</b> 86:19 <b>page</b> 4:3,10 34:18 49:10,12,24 <b>paid</b> 105:23 <b>Palmer</b> 1:12 20:10 45:10,16,25 46:8 46:18 47:11 49:21</p>	<p>50:25 59:15,22 60:1 61:9 <b>pamphlet</b> 29:12 <b>pamphlets</b> 29:9,10 29:22,24 30:11 55:14,20 <b>pandemic</b> 103:4 <b>papers</b> 45:12 <b>paperwork</b> 46:3 <b>parade</b> 44:3 <b>parallel</b> 66:22 <b>parents</b> 40:11 <b>Parkway</b> 2:23 <b>part</b> 10:21 11:25,25 13:8,24 14:1,2 32:19 42:5 50:13 69:19,19 71:1,1 91:11 92:3 <b>participants</b> 1:23 <b>participate</b> 102:2 <b>participation</b> 73:20 <b>particular</b> 22:22 24:3 25:19 26:4 49:3,6 60:20 72:12 73:13 74:11 <b>particularly</b> 89:3 <b>parties</b> 15:12,13 97:7 102:25 <b>parts</b> 92:3 <b>party</b> 11:10,16 13:16 36:5,16 40:2 75:5,6,10,20 76:3,4,12,19,23 77:7,11 78:1,10 78:14 79:9,23 80:24 81:20 82:17 85:18 88:8 101:11 102:19 <b>Pasco</b> 73:2 92:5 <b>pass</b> 30:2 <b>passed</b> 53:11 <b>passing</b> 38:4 <b>passionate</b> 56:6 <b>Paul</b> 26:25 27:3,4,5 29:23 31:1,4 32:3</p>
--	--	---	--	--

34:22,23 35:14,14 41:10 51:25 52:1 <b>Pause</b> 35:8 <b>pay</b> 78:8 93:16,22 <b>paying</b> 35:19 103:6 104:15 <b>PCOs</b> 36:24 101:23 <b>peers</b> 43:13 <b>pejoratively</b> 17:20 <b>pending</b> 8:24 <b>people</b> 12:15,22 14:2,6,15 16:21 25:5 29:10 30:3 34:14 35:19 36:2 36:7,21,23,23 37:3,4 38:6 42:18 44:2 51:11 56:5 67:19 69:2,2,13 69:16,21,25 70:20 70:23 71:3,7 72:21 73:15 80:5 80:14,17,18,18 81:9,11 84:13 85:2,19 90:15 101:24 102:1,2,15 102:17 103:1 <b>people's</b> 77:23 <b>Per-</b> 94:6 <b>percent</b> 51:21 69:9 70:16 107:9 <b>period</b> 18:3 57:11 <b>permanent</b> 6:1 <b>permission</b> 89:25 <b>Perry</b> 25:10 42:10 42:11 82:7 <b>person</b> 12:15 15:16 16:1,8 27:17 34:23 35:15 44:11 71:22 72:9 88:21 <b>personal</b> 15:5 45:1 69:23 71:5 79:12 <b>personally</b> 16:16 25:22 37:5 44:11 45:7 81:14 <b>perspective</b> 28:21	72:7 <b>Phil</b> 64:8 <b>PHILLIPS</b> 2:10 <b>phone</b> 14:24 27:17 27:18,19,25 28:9 29:7 30:18 33:25 48:7 50:11 52:16 52:17 54:14 57:18 58:11,21 75:19,24 75:25 76:10,17 78:12 79:19 80:23 80:25 81:3,4,6 82:10 85:21 89:9 89:12,19,23 90:25 93:9 94:4,8 95:7 104:3 <b>phonetic</b> 82:7 <b>Physical</b> 5:17 <b>picture</b> 34:17 <b>pictures</b> 37:16,21 <b>PIERCE</b> 108:4 <b>Piñero</b> 37:14 <b>place</b> 56:13 77:22 99:25 <b>places</b> 25:3 <b>plaintiff</b> 1:5 2:2 15:17 16:2,15 19:10,13,16 20:3 20:21 30:21 <b>plaintiffs</b> 1:13 2:8 3:2 50:24 61:20 100:18 <b>Plaintiffs'</b> 48:21 <b>plan</b> 18:10 52:9,12 54:9 63:19 65:24 66:17 92:14 <b>planned</b> 9:24 <b>plans</b> 18:14 66:23 100:3 <b>play</b> 20:13 87:13 <b>please</b> 5:14,18 8:14 74:9 <b>pleased</b> 19:3 22:5 40:8 60:15,16 <b>plug</b> 102:7	<b>plus</b> 76:10 <b>pocket</b> 93:19 <b>point</b> 9:9 15:11 28:16 58:3 59:17 62:8 78:9 92:2 93:15,17 <b>points</b> 34:6 <b>police</b> 38:23 <b>political</b> 14:25 15:12 33:25 34:6 56:7 83:24 <b>politically</b> 30:14 83:12 <b>politicians</b> 28:3 72:4 90:7 <b>politics</b> 82:5 85:14 102:20 <b>population</b> 12:10 13:14 22:24 69:7 69:8,10 70:15,15 70:17 73:22 74:18 <b>position</b> 16:10 83:5 <b>positions</b> 73:23 <b>possibility</b> 29:16 <b>possible</b> 7:21 67:20 <b>possibly</b> 27:22 <b>potential</b> 25:6 29:19 30:8,12 <b>potentially</b> 16:15 35:23 <b>poverty</b> 72:24 <b>power</b> 99:8 <b>pray</b> 68:2 <b>pre-COVID</b> 101:21 <b>preparation</b> 10:8 <b>prepare</b> 9:15,17 <b>prescription</b> 94:20 <b>presence</b> 24:17 <b>pretty</b> 30:14 67:2 85:7 91:4 100:25 <b>price</b> 6:25 <b>primarily</b> 95:12 <b>primary</b> 57:17 58:7 67:16 68:15 73:14 73:18 75:11 87:21	106:14 <b>printer</b> 86:20 <b>prior</b> 71:18 104:7 <b>private</b> 7:13 44:14 <b>privilege</b> 79:19 97:10,12,16 99:6 99:9,11 <b>privileged</b> 17:13 46:25 62:21 64:23 96:21 97:1 <b>probably</b> 7:19 37:4 43:2 44:14 54:20 56:1 57:13 77:3 77:14 81:12 84:20 93:20 99:20 <b>problem</b> 44:25 52:25 61:13,24 62:3 65:13,14,16 82:16 <b>proceed</b> 50:6 66:23 <b>proceedings</b> 35:8 <b>process</b> 16:24 19:8 21:9 43:20 56:9 67:25 73:24 78:20 88:19 98:15 101:15 <b>program</b> 71:17 <b>Project</b> 3:3 <b>property</b> 100:12 <b>proportion</b> 74:13 <b>propose</b> 18:14 <b>proposed</b> 21:3,14 <b>protect</b> 11:22 <b>protecting</b> 11:20 42:21,22 43:14 <b>protection</b> 24:12 <b>proven</b> 74:15 <b>provides</b> 62:13 <b>public</b> 3:4 36:4,9 55:17 <b>pull</b> 95:7 <b>pulled</b> 94:23 <b>purpose</b> 55:6 73:6 <b>pursuant</b> 107:23 108:12	<b>push</b> 46:22 <b>put</b> 21:5 31:1 33:9 34:17 37:22 49:22 56:25 67:20 68:1 68:22 74:16 75:4 75:23 83:3 86:4 87:9 105:17 <b>putting</b> 37:22 79:22 87:2
<hr/> <b>Q</b> <hr/>				
<b>qualities</b> 12:9 <b>question</b> 8:7,13,24 8:24 9:12 10:18 14:13 17:9,18 19:25 23:3 35:10 46:21 47:1,3,6 53:20 54:24 58:14 60:25 65:2,6 70:8 70:9,11 83:22 92:25 93:2 96:20 96:25 97:4 98:25 103:20 <b>questions</b> 8:17,18 9:10 59:20 62:24 80:9,19 89:7 101:1,8 104:24 106:8,12 107:5,16 <b>quick</b> 7:20 48:4 <b>quicker</b> 63:13 <b>quirks</b> 25:14 <b>quit</b> 48:12 76:17,18 91:1 <b>quite</b> 6:8 21:5 29:25 34:17 67:24 81:23 82:24 92:12 94:21 103:3 <b>quitting</b> 79:2				
<hr/> <b>R</b> <hr/>				
<b>R</b> 2:1,3 3:1,9 105:3 105:3 108:1 <b>race</b> 15:6 25:16 67:14,24 68:7 73:14 77:10 78:6 79:5,6 80:4 85:3				

85:10 86:1,3 93:15 102:4 <b>racial</b> 22:7,11 24:7 24:16 25:21 27:9 28:9 29:20 30:8 32:23 33:6 35:21 42:2,19 43:12 46:17 47:10,17 52:13 53:1 54:10 94:12 <b>racially</b> 22:13 23:19 44:24 <b>radio</b> 39:18,18 <b>ran</b> 11:8 16:10 18:1 37:5 55:16 67:8 <b>RCW</b> 37:18 <b>re-</b> 22:21 35:20 76:2 <b>re-ask</b> 17:18 35:10 <b>reach</b> 67:19 69:12 69:25 70:19 71:7 101:24 <b>reached</b> 16:14 33:21 98:12 <b>read</b> 24:25 25:2 34:18 37:23 45:13 45:18 48:17 50:10 57:21 58:23 70:7 70:9 75:2 95:19 <b>reading</b> 65:17 94:19 95:19 107:22 108:12 <b>ready</b> 93:16 <b>real</b> 48:4 <b>realize</b> 100:14 <b>realized</b> 15:4 58:23 <b>really</b> 9:21 25:18 26:21 37:23 69:24 71:6 73:17 81:13 81:22 95:17,20 102:17 <b>realms</b> 14:25 <b>reason</b> 9:2 12:23 32:21,24 67:20 76:15,16	<b>reasons</b> 61:16 71:13 84:11 85:1 <b>recall</b> 7:6,16 15:11 16:6,8,23 17:23 18:13 21:2,21 25:4 27:13,13,15 28:6,11,12,14 33:19,20,22 34:3 34:8 35:18 38:4 38:13 45:21 52:18 56:4 58:10 69:3 75:7,12 <b>recalling</b> 22:21 37:15 <b>received</b> 86:6,9,14 98:14 100:3 104:6 <b>Recess</b> 41:18 70:5 101:5 <b>record</b> 5:11,14,16 9:11 17:14 35:6 38:7 70:4,6 97:18 99:14 105:11,19 <b>recorded</b> 7:22 <b>recruiting</b> 16:2 101:12 102:14 <b>rectify</b> 79:8 <b>red</b> 94:25 95:4,11 95:13 96:2,3 <b>redistricting</b> 15:1,4 16:24 17:5,22 18:4,9,14,22 19:7 21:3 24:23 26:19 26:20 27:5,6,9 31:6 33:5 35:21 36:2 39:1 40:14 41:7 44:22 52:5 54:19 55:5 63:19 <b>redrawn</b> 32:16 <b>refer</b> 66:24 <b>referring</b> 38:8 <b>regarding</b> 66:21 99:2 107:9 <b>regards</b> 39:5 94:6 <b>register</b> 29:11 69:22 71:4 74:8,9	76:24 <b>registered</b> 13:15 14:3 73:21 74:14 75:23 89:22 <b>registration</b> 13:16 74:12 <b>relate</b> 14:19 40:11 <b>relationship</b> 97:12 <b>relief</b> 59:24 96:14 <b>remain</b> 51:22 60:22 <b>remains</b> 59:11 <b>remediated</b> 51:20 <b>remember</b> 15:10 27:10 28:22 33:11 55:21 56:2 <b>removed</b> 91:2,11 <b>rep</b> 11:25 69:19 71:1 77:25 <b>rep-</b> 44:15 <b>repeat</b> 14:13 19:14 51:9,12 54:24 <b>repeating</b> 55:22 <b>report</b> 100:11 105:7,9,13 <b>REPORTED</b> 1:25 <b>reporter</b> 7:23 8:2 70:11 89:11 107:12 108:6 <b>reporters</b> 87:7 <b>represent</b> 5:12 12:15 50:24 58:4 59:14 60:1 62:13 67:21 69:16 70:23 72:8 73:15 <b>represent-</b> 25:7 <b>representation</b> 12:2,4,6,11,13 25:7 50:15 60:10 62:11 64:19 66:22 67:17 72:8 73:23 74:18 78:5 <b>representative</b> 14:16 21:18 31:9 31:13,17 32:10,11 40:9,15 45:2,3	55:16 77:1 83:18 84:2 <b>representatives</b> 69:11,24 70:18 71:6 <b>represented</b> 14:7 14:16 59:21 <b>representing</b> 44:18 61:8,10 62:8 74:1 74:2,5 <b>represents</b> 49:18,20 50:3 <b>reps</b> 69:12,14 70:19 70:21 <b>Republican</b> 11:17 12:1 13:7,9,11 36:5,10,11,16 67:15 68:4,6,8,14 69:20 71:2 75:5 75:10,19,23 76:3 76:4,12,18,23,24 77:7 78:14 79:9 79:23 81:20 82:15 82:17 84:4,11,18 84:24 85:9,18 87:21 88:8 89:22 101:11 <b>Republicans</b> 15:13 36:7 40:3 <b>request</b> 89:5 100:6 <b>requested</b> 107:22 108:12 <b>requests</b> 99:2 <b>required</b> 99:15 <b>requirements</b> 87:4 <b>requiring</b> 100:5 <b>research</b> 33:8 34:4 77:15 <b>reside</b> 51:15 <b>resident</b> 51:22 <b>resolve</b> 95:15 <b>respect</b> 87:20 90:12 91:9 <b>response</b> 92:18 <b>responsible</b> 52:9	<b>retainer</b> 64:13,15 <b>retired</b> 10:15,16,22 <b>retirement</b> 11:7 <b>return</b> 37:10 <b>returned</b> 7:8 82:4 98:11 <b>review</b> 10:8 <b>reviewed</b> 65:9 <b>reviewing</b> 68:19 <b>right</b> 10:5,13 12:15 15:10,17 19:21 20:7 23:4 33:2 35:16 36:9 38:9 42:18 43:5,11,16 43:17 48:5,10 51:7 52:16 54:11 57:22 58:12,23 59:7,10 60:17 61:4 63:8 65:4 66:17 67:8 68:10 74:22 77:22,22 78:2,24 79:2 82:11 83:8,12,13 83:21,21 85:6,8 86:6,10,14,17,17 86:21 87:25 88:11 88:20 91:20,23 92:5 93:12,14,23 97:13 102:9 106:21 107:6 <b>rights</b> 3:3 11:22 13:18 14:4 29:11 34:1 42:12,22,22 45:6 56:6 77:24 77:24 <b>ring</b> 59:1 <b>RNC</b> 75:18 76:2,17 78:11 79:1,13 82:3,6 91:7 <b>Road</b> 6:4 <b>RPR</b> 1:25 108:20 <b>Rule</b> 107:23 108:13 <b>rules</b> 7:19 20:13 <b>run</b> 11:10,12,16,18 47:22 68:1 71:14
---	---	---	--	---

82:20 84:24 85:13 101:12 <b>run-</b> 34:13 <b>running</b> 21:19 28:2 34:6 36:1,18 44:1 56:7 67:5,10 68:6 69:1 72:2 73:17 81:5 85:2,3 91:9 <b>rural</b> 12:18 <b>rush</b> 63:12 <b>Russian</b> 12:13	26:10,13 29:21 47:18,21,25 48:9 48:14,20,24 49:5 49:11,11 50:2,7 53:11 61:13,20,22 69:14 70:21 73:6 73:22 74:6 77:15 77:16,19 80:15,25 81:1 84:13 88:14 91:5 94:9,9,24,25 95:4,5,11,13,13 96:2,3 <b>seeing</b> 21:2,21 67:25 77:23 94:18 96:6 <b>seen</b> 20:17,22,22 21:11,14,16 22:10 23:23 48:25 49:7 105:7 <b>Seminole-Negro</b> 68:13 <b>Senate</b> 11:25 69:19 71:1 77:25 <b>senator</b> 44:4,7,9,15 44:15 83:9,24 84:17 85:8,12,12 <b>send</b> 19:9 81:10,12 85:21 94:22 <b>sense</b> 7:24 9:13 12:8,9 18:6 22:25 24:6 26:14 46:2 72:17 77:6 87:11 89:21 93:20 <b>sent</b> 19:2,5 20:23 50:25 85:15,16 89:9 104:8 <b>sentiments</b> 28:14 <b>SEPA</b> 24:11 <b>seriously</b> 92:25 <b>served</b> 11:21 31:18 32:6 45:12 46:2 49:1,3 88:17 <b>server</b> 88:19 98:15 <b>serves</b> 65:19 <b>service</b> 13:1	<b>serving</b> 16:15 88:21 <b>Sessler's</b> 80:18 <b>set</b> 43:7 95:21 108:14 <b>setting</b> 83:23 94:12 <b>settled</b> 7:14 79:11 <b>settling</b> 7:2 <b>seven</b> 26:22 <b>shaking</b> 8:1 <b>shape</b> 23:16 <b>share</b> 14:18 48:5 73:9 94:9 <b>shares</b> 14:7,17 <b>sharing</b> 50:19 <b>shift</b> 67:4 <b>shocked</b> 85:25 <b>shook</b> 40:7 84:6 <b>Shoot</b> 102:9 <b>shooting</b> 77:18 <b>shop</b> 99:22 <b>show</b> 47:13 48:4 98:23 99:15 102:15 <b>showed</b> 71:24 <b>showing</b> 9:20,20 20:12 <b>sic</b> 31:8 <b>sick</b> 9:5 <b>side</b> 12:11 38:5,7,8 38:10,11 <b>side's</b> 63:5 <b>sideways</b> 102:10 <b>signed</b> 47:25 49:12 96:15 97:5,9 <b>signing</b> 107:22 108:12 <b>similar</b> 82:15 <b>simply</b> 93:5 97:5 100:6 <b>Sims</b> 37:12,25 38:2 38:3 <b>sincere</b> 58:20 71:22 <b>sir</b> 17:16 <b>sit</b> 67:1 89:6 100:16 <b>situated</b> 95:11	<b>situation</b> 16:3,4 67:2 79:8 82:18 100:7 <b>six</b> 104:10,10,13 <b>skill</b> 108:10 <b>skip</b> 41:12 <b>slate</b> 101:16 <b>slow</b> 66:2 <b>smoothly</b> 7:21 <b>socioeconomic</b> 72:13 <b>somebody</b> 34:5 <b>somebody's</b> 77:16 <b>somewhat</b> 34:16 <b>SONNI</b> 3:3 <b>Sonni@uclavrp....</b> 3:5 <b>soon</b> 63:7 100:25 <b>sorry</b> 6:9 7:5,11,16 13:7,12,13 17:2 17:10 18:16 19:20 20:17 22:16 31:25 31:25 36:22 38:20 40:24 42:14 47:15 48:7 50:10 53:19 56:24 62:19 63:1 66:2 68:21 86:7 88:4 90:13 93:1,1 95:9,10 96:1,10 96:24 100:22 103:18 105:22 <b>sort</b> 47:4 77:6 83:10 96:15 97:5 97:14 101:15 <b>Soto</b> 1:12 20:10 45:10,16,25 46:8 46:18 47:11 49:21 50:25 59:15,22 60:1 61:9 <b>sounds</b> 7:18 13:5 35:12 38:3,3 87:20 90:13 <b>South</b> 2:19 72:12 <b>southern</b> 95:4 <b>Spanish</b> 68:25	75:21 91:3,11 <b>speak</b> 10:3 28:24 32:5 36:10 40:4 63:25 64:4 <b>speaker</b> 40:4 <b>speaking</b> 8:6 29:23 32:4 33:23 73:13 <b>speaks</b> 27:4 <b>species</b> 24:13 <b>specific</b> 25:14 57:1 <b>specifically</b> 25:12 33:13 58:9 <b>speculation</b> 72:16 <b>speech</b> 18:1 80:5,7 80:8 <b>spell</b> 82:7 <b>spent</b> 68:19 104:22 <b>spoke</b> 9:19 29:21 29:22 32:3 33:10 33:12,15 34:25 35:22 36:8,21,23 37:25 38:6 40:6 54:20 56:5 57:18 58:5 59:4 84:5 98:5 <b>spoken</b> 28:2 30:4 36:5 37:9,12 82:14 97:21 103:25 104:3 <b>spring</b> 2:19 98:5 <b>springtime</b> 57:6 <b>staff</b> 52:8 81:15 85:16 91:8 <b>staffers</b> 36:13 <b>staffing</b> 76:5 <b>stand</b> 98:25 <b>Starbucks</b> 99:22 <b>start</b> 20:11 93:13 93:20 <b>started</b> 19:18 31:5 32:2 60:14 <b>state</b> 1:8,8,15,16 5:12 16:10 21:8 24:14,23,24 40:9 44:4,15,15 53:12
<b>S</b>				
<b>S</b> 2:1 3:1 <b>safe</b> 102:2 <b>Sarah</b> 38:12 <b>saved</b> 77:16 <b>saw</b> 20:4 22:1,4 23:2 49:1 81:23 88:19 <b>saying</b> 19:18 61:25 76:13 80:20 86:22 <b>says</b> 17:8 48:20 49:17 50:2 <b>scars</b> 83:4 <b>scheduled</b> 105:25 <b>school</b> 12:25 55:17 55:17 71:18 72:23 72:24 73:5 <b>screen</b> 48:6,9,11,14 50:19 94:9,23 <b>scriptures</b> 87:18 <b>scroll</b> 49:10 <b>Sea</b> 82:19 <b>seal</b> 108:15 <b>seats</b> 71:11 <b>Seattle</b> 1:3 3:11 <b>second</b> 7:12 35:7 69:7,8 70:14,15 76:21 87:17,18 100:4 <b>secretary</b> 1:8,15,16 13:22 <b>see</b> 12:10,13 18:7 18:18 19:12,15 20:1,19 21:5				

55:16 56:14 69:7 69:7,8 70:14,14 70:15 71:16 75:4 75:10 76:3,4,12 76:22 77:7 78:14 79:9,14 81:20 82:16 84:2 85:5 85:12,17 88:8 91:18 101:13 108:3,7 <b>State-based</b> 103:12 <b>stated</b> 15:1 31:12 61:6 <b>statement</b> 62:17 <b>statements</b> 36:4,10 <b>STATES</b> 1:1 <b>stating</b> 5:13 <b>station</b> 39:18 <b>status</b> 72:13 <b>stay</b> 31:13 85:1 100:6 106:23 <b>Steve</b> 10:11 19:24 <b>STEVEN</b> 1:7,15 <b>Stokesbary</b> 2:3 4:7 9:11 10:4,10 14:9 15:19 17:6,8,10 18:16 20:25 22:16 23:21 33:21 34:9 34:24 35:3,16 46:19 47:2 49:13 49:17 54:23 55:24 58:4 62:19 64:22 65:5,18 66:2,16 72:5,15 88:1,3 95:16 96:19 97:8 97:22 98:19 99:1 101:18 103:17 104:1,17 105:10 105:18 106:7,11 107:15 <b>Stokesbary's</b> 33:17 <b>stop</b> 11:4 50:19 <b>storages</b> 86:20 <b>story</b> 40:9 <b>straightened</b> 100:9	<b>Street</b> 2:4,11,15,19 <b>stretching</b> 94:16 <b>strike</b> 6:12 29:14 48:22 52:11 61:2 <b>StrikeForce</b> 75:18 85:23 89:19 90:16 90:17,18 91:6 94:5 <b>strong</b> 78:21 <b>strongly</b> 14:3 43:14 45:4,6 77:24 <b>struggle</b> 102:14 <b>stuff</b> 95:20 100:7 100:10 <b>submit</b> 17:4,21,24 18:11 <b>subpoena</b> 9:24 46:8 46:11 49:2,4 50:25 64:12 86:9 92:18 95:20 98:14 99:18 100:4 <b>subpoenas</b> 23:11 23:11,13 86:6,14 88:14 <b>suggested</b> 28:9 34:22 35:13 55:2 <b>suggestion</b> 34:5 <b>Suite</b> 2:5,11,15 3:11 <b>summer</b> 21:23,25 <b>Sumner</b> 2:5 <b>Sunnyside</b> 38:22,23 <b>supervisors</b> 76:23 <b>support</b> 66:13 86:4 <b>supported</b> 75:17 78:10 79:18 <b>supporters</b> 75:4 <b>supposed</b> 53:12 69:16 70:23 94:20 100:2 <b>suppress</b> 75:10 77:8 87:22 <b>suppressed</b> 77:5 <b>suppressing</b> 76:19 89:14	<b>suppression</b> 78:3 79:4 <b>Supreme</b> 56:14 <b>sure</b> 8:16 25:24 28:1 41:4 48:5 58:13,19,20 73:24 86:24,24 92:23 93:6 98:2 102:8 105:1 107:9 <b>surfaced</b> 37:20 <b>surprise</b> 34:4 <b>surrounding</b> 75:3 <b>Susan</b> 1:12 20:10 <b>switch</b> 45:9 <b>switched</b> 76:11,19 89:23 <b>sworn</b> 5:5 108:9 <b>sympathetic</b> 52:24 <b>system</b> 36:17 43:4 75:19,25 79:19 80:23,25 81:3 89:20	30:17 34:6 35:19 41:5 56:19 58:9 80:9,16 86:1,2,8,8 87:7 <b>taqueria</b> 69:15 70:22 <b>Task</b> 90:15 <b>telephone</b> 75:3 <b>tell</b> 6:21 89:1 98:17 <b>tells</b> 9:11 <b>ten-plus</b> 24:8 <b>tends</b> 73:3 <b>term</b> 17:20 <b>terms</b> 83:24 101:12 <b>testified</b> 5:6 53:14 53:22 60:20 <b>testify</b> 86:10 <b>testimony</b> 9:3 53:18,25 86:15 <b>testing</b> 96:8 <b>Texas</b> 75:18 77:11 90:18 <b>text</b> 81:10 85:19,21 89:8 90:13 91:1,3 93:11 <b>texts</b> 90:14,24 94:4 <b>thank</b> 6:10 17:16 17:16 41:22 50:20 51:5 77:21 100:20 101:4 106:6 107:18,20 <b>thing</b> 30:23 33:2 52:19 54:2 77:22 78:2 83:8,21 94:19 <b>things</b> 23:17 25:1 25:20 28:16 31:20 32:22 34:2 36:8 56:7,10 66:20 69:18 70:25 75:9 76:21 82:25 83:1 83:2,5 86:5,19 97:9 103:2,3 107:9 <b>think</b> 14:5,14,18	22:13 23:2 25:15 26:1,22 32:11 33:15 35:3 44:14 55:25,25 56:1 57:6 63:2 64:3,5 72:7 82:11,21 84:3,4,9,14 86:11 88:7,16,18 93:3 94:3 95:21 96:25 97:14,17 98:1,22 101:2,2 102:14 104:3 106:5 <b>thinking</b> 32:22 40:20 <b>thinks</b> 54:9 <b>third</b> 77:11 78:10 <b>thought</b> 20:9 40:5 47:3 52:25 55:12 94:12,20 95:22 99:19 <b>thousand</b> 71:15 <b>three</b> 22:21 25:17 26:7 59:14 76:7 <b>throw</b> 83:6 <b>Thursday</b> 98:2 <b>time</b> 7:7,12 8:22 14:13 17:11 18:9 18:24 21:20,22,25 30:4,7 37:20 38:23 39:7,11,24 41:14 42:10 46:5 48:13 53:4 56:10 57:11 60:17,24 61:7,10 62:20 66:14,18,21 67:10 68:19 70:3 73:20 74:19 77:22 78:9 78:23 83:16 86:4 86:18,23 88:15,23 89:2 90:6,7 92:16 96:12 98:5 100:1 101:3 104:6,13,25 <b>times</b> 5:24 35:24 51:14 87:2 97:20 98:1 100:8 104:1
---	---	--	---	--

---

**T**


---

**T** 5:8 41:19 50:21  
71:9 101:6 105:3  
105:3 106:10  
108:1,1  
**Tacoma** 1:22 5:1  
51:7 54:4 99:16  
99:19  
**take** 41:15,16 57:24  
58:21 70:4 72:22  
72:23 78:23 79:12  
79:25 83:6 100:8  
100:13,24 101:2  
**taken** 1:24 42:10  
54:1 66:15  
**talk** 8:3 29:10 53:4  
66:24 67:5 75:14  
83:23  
**talked** 16:18 29:19  
31:4 34:23,24  
35:15 39:4 59:12  
63:17 96:11  
**talking** 20:16 28:21



<b>tiny</b> 92:3	<b>truly</b> 11:22 13:15 13:17 69:12 70:19	88:13 89:2,13 92:16 94:15 99:5 99:8	<b>video</b> 89:17	<b>Walkinshaw</b> 37:14 38:1
<b>today</b> 9:3,16 51:4 54:4 60:5 66:20 67:1 84:16 86:8 92:20 93:4 98:24 100:21 104:2 107:4	<b>trusting</b> 90:6,7	<b>understanding</b> 21:17 24:9,12,13 24:19,21,22 26:15 45:15 52:15 53:2 55:8 79:3 99:15 103:8	<b>videoconference</b> 1:19,23	<b>Walla</b> 92:3,3
<b>today's</b> 64:11,17 98:17	<b>truthful</b> 9:3	<b>understands</b> 14:8 14:16	<b>videos</b> 68:20,24	<b>want</b> 6:3 7:19 8:16 13:22 15:14 16:1 16:5 21:23 27:21 36:20 37:10 40:12 41:16 42:23 43:1 43:17 44:18 45:9 49:10,24 51:1,9 58:13,15 61:4,11 61:19 66:23 67:4 73:19,22,23 74:1 74:6,9 79:10,24 83:1,2,19,21 84:13 87:13 91:5 92:24 94:7 96:14 99:9 100:15,16,19 101:10 103:14,21 107:18
<b>told</b> 35:12 42:5 60:25 77:11 79:1 82:18 96:12 98:23 106:3	<b>try</b> 8:6 29:24 30:5 48:12 51:9 73:20 74:8 82:9 84:9 102:5	<b>understood</b> 8:4 10:2 20:18 23:15 26:14 30:16 31:22 43:21 45:8 48:3 100:4	<b>view</b> 14:6 62:8	<b>wanted</b> 14:1 29:9 30:2 34:15 51:13 54:15,17 67:19 75:4 89:14 90:3
<b>today's</b> 64:11,17 98:17	<b>trying</b> 6:5 7:16 15:10 16:5 25:4 26:14 30:19 50:10 73:19 75:10 85:3 89:13 102:17 103:18	<b>unequal</b> 87:24	<b>viewing</b> 48:8	<b>wanting</b> 29:21 102:2
<b>top-down</b> 101:15 101:23	<b>Tuesday</b> 86:12 88:16,16	<b>unexpectedly</b> 48:12	<b>views</b> 84:22	<b>Wapato</b> 41:6
<b>Toppenish</b> 72:22	<b>turn</b> 81:7	<b>unfortunately</b> 30:1 74:19	<b>visit</b> 51:6	<b>Washington</b> 1:2,8 1:9,17,22 2:12 5:1 5:12,19 6:4 13:23 51:16 72:12 76:2 76:4,12,18,22 78:14 81:20 88:8 92:1 103:12 108:3 108:7
<b>Torchinsky</b> 64:4	<b>turnout</b> 74:22,24	<b>unusual</b> 22:23 26:8 52:11	<b>Vogel</b> 58:14 64:1	<b>wasn't</b> 21:9 30:1 32:15 52:7 54:18 60:4 65:13 85:13 92:23 93:6 100:23
<b>Torres</b> 43:23 44:4,7 44:9,15,16,18 83:10,24 84:17 85:8	<b>twice</b> 27:1 104:3	<b>upset</b> 32:13,15 80:3 80:5,14	<b>voice</b> 78:2,13	<b>wavering</b> 48:1
<b>touch</b> 31:1 55:23	<b>two</b> 51:11 68:1 76:22,23 86:6,14 89:2 98:1	<b>United</b> 1:1 13:21 42:6	<b>voicemail</b> 76:9,11 76:19 81:19 89:23	<b>way</b> 42:13,15 43:2 47:18,21 50:14 56:17,19 83:19 91:24 100:20 102:23
<b>touched</b> 14:5,14	<b>type</b> 24:15 82:16	<b>unregistered</b> 13:25	<b>voluntarily</b> 50:4	
<b>trained</b> 23:25	<b>typically</b> 20:11	<b>unusual</b> 22:23 26:8 52:11	<b>volunteers</b> 78:12,22 81:17 86:4	
<b>training</b> 89:18		<b>useless</b> 58:24,25	<b>vote</b> 13:15 14:3,20 16:21 29:11 30:3 66:15 69:21,22,23 71:3,4,5 74:14,19 74:20 76:1,13,20 77:5,8 79:5 84:9 85:9 87:23 89:14 106:14,17 107:1	
<b>transaction</b> 6:24	<b>U</b>	<b>use</b> 17:19 58:21,23 75:19 76:5 78:18 82:9	<b>voted</b> 44:13 65:23 66:17 84:3,4	
<b>transcript</b> 108:8	<b>U</b> 105:3	<b>useful</b> 58:24,25	<b>voter</b> 43:3 74:12,22 74:23	
<b>Transfer</b> 48:22	<b>U.S</b> 11:8 34:14 47:22 71:14 86:1	<b>v</b> 1:6,14 20:7,20 45:10,16 47:11	<b>voters</b> 13:25 42:12 72:12 74:8,12,14 74:23 75:11 80:3 87:24 88:10 89:22 89:22	
<b>transition</b> 5:25	<b>UCLA</b> 3:3	<b>VA</b> 65:12,14	<b>voting</b> 3:3 14:3 19:8 42:22 84:12	
<b>travel</b> 51:3	<b>Uh-huh</b> 26:17 30:6 50:1,9 62:2	<b>Valley</b> 73:5,9		
<b>traveling</b> 51:5 100:20	<b>ultimately</b> 26:16	<b>verbal</b> 7:23		
<b>Trevino</b> 38:14,16 38:17 39:2,8 45:20,24,25 46:16 47:9 60:20 63:21	<b>Umm</b> 95:6	<b>verbally</b> 91:1		
<b>Tri-Cities</b> 44:3 73:3,7	<b>unaware</b> 19:22 60:23 65:25	<b>versa</b> 8:7		
<b>trial</b> 105:25	<b>unchanged</b> 60:22	<b>version</b> 91:3		
<b>trick</b> 58:13	<b>uncle</b> 65:14	<b>versus</b> 10:11		
<b>tried</b> 107:4	<b>under-</b> 55:8	<b>Veterans</b> 31:19		
<b>trouble</b> 95:1 96:3	<b>understand</b> 7:22 8:10,14,17 12:18 20:8 24:1 49:20 54:8 59:6,10,13 61:3 63:25 65:15 69:12,13,24 70:19 70:20 71:6 86:16	<b>vetting</b> 36:17		
<b>Troyer</b> 37:2		<b>vice</b> 8:7		
<b>true</b> 68:16 107:7 108:10		<b>victor</b> 77:3		
			<b>W</b>	
			<b>W</b> 2:15	
			<b>WA</b> 2:5,23 3:11	
			<b>wait</b> 8:6 89:17	
			<b>waiting</b> 71:11	
			<b>waive</b> 24:2	
			<b>waiver</b> 96:16,18 97:1,6,11,13,16	
			<b>WAKNIN</b> 3:3	

<b>ways</b> 84:12	<b>wonderful</b> 80:15	60:20 63:17	<b>12:01</b> 101:5	<b>311</b> 5:19 6:7 51:16
<b>we'll</b> 8:21	<b>word</b> 79:17 80:22	<b>yeah</b> 7:4 14:14	<b>12:11</b> 107:21	<b>3250</b> 3:4
<b>we're</b> 12:18 20:5	<b>words</b> 28:19 72:20	17:10 22:2,2	<b>13</b> 6:13	<hr/> <b>4</b> <hr/>
56:19 69:7 70:14	<b>work</b> 8:8 11:1 18:4	27:18 29:18 39:6	<b>14th</b> 2:11	<b>4</b> 49:10,24 91:15
71:11 81:16,16,17	18:25,25 24:6	39:8,20 55:2	<b>15</b> 6:13,14,15 7:17	92:13
81:18 83:1 86:1,2	52:4 59:7 71:18	56:19 57:9,13	28:9 32:17 41:24	<b>40</b> 69:9,9 70:16,16
87:1 90:1 100:15	79:20 93:25	58:25 63:1,11	52:9 53:1,6 92:13	<b>400</b> 2:11
<b>We've</b> 87:1 89:17	<b>worked</b> 10:24,24	64:22 73:11 75:1	94:13	<b>4th</b> 11:13 12:7,15
89:18	12:20,25 70:3	82:11 84:7 85:11	<b>15th</b> 18:5 21:19	36:15 47:24 67:21
<b>wear</b> 83:4	71:17 76:2	86:5 88:22 91:17	26:7 31:8,16	69:10 70:17 74:4
<b>website</b> 18:11	<b>working</b> 11:4 24:8	91:24 92:15 93:14	106:20 107:1,2	75:1,23 76:14
<b>week</b> 46:12,13	40:10,11 63:5	94:25 95:9,13	<b>1925</b> 2:15	78:5 79:14 82:20
93:23 98:1,3,6,12	72:1	96:10 97:3 98:7	<b>1967</b> 13:13	82:21 87:21
104:3	<b>works</b> 41:15 101:15	98:13,13 100:12	<hr/> <b>2</b> <hr/>	<hr/> <b>5</b> <hr/>
<b>weeks</b> 89:2	<b>world</b> 87:18	101:18 105:2	<b>2000</b> 3:11	<b>5</b> 2:5 4:4
<b>welcome</b> 41:21 78:4	<b>worries</b> 32:1 95:3	106:13	<b>20005</b> 2:12	<b>50</b> 4:5
<b>Wenatchee</b> 76:24	<b>wouldn't</b> 34:4 73:4	<b>year</b> 21:24 57:1	<b>2003</b> 10:21	<b>50,000</b> 81:6
<b>went</b> 31:5 48:11	84:16 97:15	93:16	<b>2008</b> 10:21,23	<b>509.380.9999</b> 2:24
53:13 56:17 63:4	<b>Wow</b> 82:12	<b>years</b> 6:22 12:25	<b>2012</b> 43:8	<b>51</b> 12:25 13:4 71:18
67:25 74:7 84:8	<b>wrap</b> 100:25	13:4 24:8 38:17	<b>2013</b> 7:16	<b>55</b> 2:15
<b>weren't</b> 37:17	<b>write</b> 79:13,13,14	38:24 39:9	<b>2015</b> 102:5	<hr/> <b>6</b> <hr/>
<b>western</b> 1:2 38:8,10	<b>writing</b> 49:22	<b>yesterday</b> 58:5,16	<b>2016</b> 67:16 102:6	<b>60603</b> 2:16
38:10	<b>written</b> 10:11 11:21	58:17 59:10	<b>2019</b> 11:6	<b>643</b> 2:19
<b>whatnot</b> 34:7 36:16	15:15 62:12 97:5	<hr/> <b>Z</b> <hr/>	<b>202.736.2200</b> 2:12	<b>6th</b> 108:15
36:25 68:20 93:11	<b>wrong</b> 24:16 25:13	<b>zones</b> 19:7 72:20	<b>2021</b> 18:5,5 57:4,7	<hr/> <b>7</b> <hr/>
99:23	42:18 43:5 63:4	<b>Zoom</b> 9:21 27:17	57:11	<b>7</b> 49:12
<b>whatsoever</b> 19:3	80:2 83:20	48:12 86:12	<b>2022</b> 21:25 27:21	<b>7:00</b> 88:17
<b>WHEREOF</b>	<hr/> <b>X</b> <hr/>	<hr/> <b>0</b> <hr/>	27:23 57:4 67:8	<b>732</b> 2:23
108:14	<b>X</b> 5:8 41:19 50:21	<hr/> <b>1</b> <hr/>	98:5 106:14	<hr/> <b>8</b> <hr/>
<b>white</b> 68:15 72:14	71:9 101:6 105:3	<b>1,000</b> 12:19,22	<b>2023</b> 1:24 5:1 108:9	<b>800</b> 3:10
74:14	106:10	<b>1/2</b> 2:4	108:15	<b>82</b> 25:19 26:5
<b>wife</b> 39:8	<hr/> <b>Y</b> <hr/>	<b>10,000</b> 76:9 89:22	<b>2026</b> 13:23 108:23	<b>822</b> 6:4
<b>Wikipedia</b> 34:18	<b>Yakima</b> 5:20,23	<b>10:00</b> 41:18	<b>206.207.3920</b> 2:6	<hr/> <b>9</b> <hr/>
<b>winning</b> 79:20	15:2,15 21:6	<b>10:07</b> 41:18	<b>206.464.7744</b> 3:12	<b>9</b> 108:23
<b>winter</b> 27:21,21	24:25 25:2 26:6	<b>10:52</b> 70:5	<b>213.629.2512</b> 2:20	<b>9:09</b> 5:2
56:25	31:19 37:16 72:24	<b>100</b> 107:9	<b>2357</b> 1:25 108:20	<b>90</b> 51:21
<b>wintertime</b> 56:20	73:5,8 74:13,16	<b>1003</b> 2:4	<hr/> <b>3</b> <hr/>	<b>90014</b> 2:20
57:8	74:23 76:24 85:7	<b>105</b> 4:6	<b>3</b> 1:24 5:1 108:9	<b>90095</b> 3:4
<b>withdrawn</b> 60:8	91:19 92:2,9	<b>106</b> 4:7	<b>3:22-cv-5035</b> 1:14	<b>98104</b> 3:11
<b>witness</b> 5:4 17:16	94:16 95:5,12	<b>11:06</b> 70:5	2:2,8 3:2,7	<b>98390-1444</b> 2:5
41:17 50:19 62:25	101:13	<b>11:54</b> 101:5	<b>3:22-cv-5152-RSL</b>	<b>98930</b> 5:19 6:4
63:3,6,10,15	<b>Ybarra</b> 39:21,23	<b>1101</b> 2:11	1:6 2:2 3:7	
96:24 101:4	40:15 45:21,24	<b>11th</b> 2:19	<b>30(e)</b> 107:23 108:13	
107:20 108:14	46:16 47:9 48:19		<b>310.400.6019</b> 3:5	
<b>witnesses</b> 61:19				

51:16 99336-8100 2:23				
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# EXHIBIT B

Soto Palmer, et al.

v.

Hobbs, et al.

\* \* \* \* \*

Remote  
Deposition Upon Oral Examination of  
Ismael G. Campos  
October 13, 2022

\* \* \* \* \*

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Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

---

SUSAN SOTO PALMER, et al., )  
Plaintiffs, )  
v. )  
STEVEN HOBBS, in his official )  
capacity as Secretary of State )  
of Washington, and the STATE OF )  
WASHINGTON, ) No. 3:22-cv-05035-RSL  
Defendants, )  
and )  
JOSE TREVINO, ISMAEL G. CAMPOS, )  
and State Representative )  
ALEX YBARRA, )  
Intervenor-Defendants. )

---

REMOTE DEPOSITION UPON ORAL EXAMINATION OF  
ISMAEL G. CAMPOS

---

Thursday, October 13, 2022  
9:29 a.m. to 12:29 p.m.

REPORTED BY: LAKESIDE REPORTING  
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Page 2

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Page 3

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14 \*\*\*\*\*  
15 EXAMINATION INDEX  
16 ISMAEL G. CAMPOS PAGE  
17 By Ms. Leeper 4  
18 By Mr. Stokesbary 92  
19  
20 \*\*\*\*\*  
21 EXHIBITS  
22 (None offered)  
23  
24  
25

Page 4

1 October 13, 2022, Remote Proceedings:  
2 PROCEEDINGS: 9:29 a.m.  
3 (Discussion off the record.)  
4 ISMAEL G. CAMPOS,  
5 having been sworn/affirmed on oath to tell the truth, the  
6 whole truth, and nothing but the truth, testified as  
7 follows:  
8 EXAMINATION  
9 BY MS. LEEPER:  
10 Q Good morning, Mr. Campos. My name is Simone Leeper,  
11 and I am one of the attorneys that is representing the  
12 plaintiffs in this case. I want to sort of introduce for  
13 you the other counsel that are on the phone with us.  
14 So there's going to be Karl Smith, who represents  
15 the Secretary of State, but he will not be speaking during  
16 today's deposition. There's Andrew Hughes, who represents  
17 the State of Washington. And, of course, you know your  
18 attorney, Mr. Stokesbary.  
19 There's also on the line a number of other attorneys  
20 representing the plaintiffs, but they're not going to be  
21 speaking with you today. It's just going to be a  
22 conversation between the two of us.  
23 I want to go over just a couple of ground rules  
24 about how this deposition is going to go and how we can  
25 make everyone's life easier, especially Jeanne's in the

Ismael G. Campos

October 13, 2022

Page 5	Page 6
<p>1 process; but before I do that, have you ever been deposed 2 before?</p> <p>3 A No, ma'am.</p> <p>4 Q Okay. Thanks for letting me know that.</p> <p>5 So one of the things that's going to make Jeanne's 6 life easier is if we do not talk over one another. And 7 she covered this a bit off the record, but just to 8 reiterate, if I can get my full question out, and then 9 I'll be sure to make sure that I let you get your full 10 answer out; and if we try our best not to overlap with one 11 another, that will just make for a much cleaner record and 12 make Jeanne's life a little bit easier.</p> <p>13 Something else is that this is obviously going to be 14 a written transcript, so we need to keep our responses 15 verbal. So I know it's an inclination I have to nod or 16 shake my head, or to say things like uh-uh or um-hmm to 17 answer a question. That's not very clear on the record; 18 so if you could keep it to yes or no answers and keep 19 everything out loud, that will be sure that we record your 20 full testimony.</p> <p>21 Do you understand that?</p> <p>22 A Yes, I do. I'm sorry. I have a fly flying around 23 here.</p> <p>24 Q Don't worry, if you have to swat a fly, I promise I 25 won't let it break up our momentum.</p>	<p>1 Something else just to keep in mind is that if you 2 don't understand any of the questions that I ask you today 3 at any point in time, that's okay. You should just ask me 4 for clarification about the question, and I can rephrase 5 it or explain it again. But if you do answer a question 6 that I ask, I'm going to assume that you understood the 7 question and are able to answer it.</p> <p>8 Does that make sense to you?</p> <p>9 A Yes. Yes.</p> <p>10 Q Okay. This is hopefully not going to be too, too 11 long today; but if at any point you find yourself needing 12 to take a break to go to the restroom or get a drink of 13 water, or if you're just a little bit tired, that's 14 totally okay.</p> <p>15 All I would ask is that you don't ask to take a 16 break when a question is still pending, and just maybe 17 give me a little bit of notice, and we'll be sure that we 18 take a break at a time that works for you and we get 19 through the line of questioning we're in.</p> <p>20 Does that make sense?</p> <p>21 A Um-hmm; yes.</p> <p>22 Q Okay. And then one last thing is that the way 23 depositions work is that some of the attorneys present 24 might object to the form of some of the questions that I 25 ask. If that happens, that objection is going to be noted</p>
Page 7	Page 8
<p>1 for the record, but you still must answer the question 2 that I asked.</p> <p>3 Does that make sense to you?</p> <p>4 A Yes. Yes.</p> <p>5 Q Okay. All right. Mr. Campos, could you please 6 state and spell your full name for the record?</p> <p>7 A Ismael G. Campos. I-S-M-A-E-L, G, Campos, 8 C-A-M-P-O-S.</p> <p>9 Q And it seems you broke up a little bit. Could you 10 say your middle initial again one more time?</p> <p>11 A That's G like in George, Gonzalez.</p> <p>12 Q Okay. Great. Thank you.</p> <p>13 And is there anything in particular that you prefer 14 I call you today during the deposition?</p> <p>15 A Mel is good.</p> <p>16 Q Okay. Great. Thanks, Mel. You can call me Simone. 17 So what is your address?</p> <p>18 A 9008 West Rio Grande, Kennewick, Washington.</p> <p>19 Q And also for the record what is your race?</p> <p>20 A My what?</p> <p>21 Q Your race.</p> <p>22 A My rate?</p> <p>23 Q Race, like ethnicity.</p> <p>24 A Oh, race. Okay. I'm Mexican.</p> <p>25 Q All right.</p>	<p>1 A I'm sorry, I was hearing a T at the end.</p> <p>2 Q I'll be sure to enunciate.</p> <p>3 So in today's deposition I'm going to be using the 4 terms Hispanic and Latino interchangeably, and when I 5 refer to white residents I'm going to be referring to 6 white residents who do not identify as Hispanic or Latino.</p> <p>7 Do you understand that?</p> <p>8 A Um-hmm; yes.</p> <p>9 Q Mel, do you understand that you're under oath today?</p> <p>10 A Yes, I do.</p> <p>11 Q Is there any reason why you can't give truthful 12 answers to my questions?</p> <p>13 A No reason.</p> <p>14 Q Are you taking any medications that might impair 15 your memory?</p> <p>16 A No.</p> <p>17 Q And do you have any conditions that might impair 18 your memory?</p> <p>19 A No.</p> <p>20 Q Okay. So part of the oath that you took today was 21 to tell the whole truth, and so what that means in the 22 context of this deposition is that you need to provide 23 full and complete answers to the questions that I ask.</p> <p>24 Do you understand that?</p> <p>25 A Yes.</p>

2 (Pages 5 to 8)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

Page 9	Page 10
<p>1 Q Sometimes it might happen that later on in the 2 deposition you might remember some additional details or 3 clarification to an answer that you gave to a previous 4 question that I had. If that happens, you should say so 5 at the time and let me know that you want to add to or 6 clarify a previous answer that you gave, and we'll go 7 ahead and do that right then when it's still fresh on your 8 mind.</p> <p>9 Does that work for you?</p> <p>10 A Yes.</p> <p>11 Q Okay. And finally, is there any reason why you 12 cannot give full, complete and accurate testimony today?</p> <p>13 A Nope.</p> <p>14 Q Mel, have you ever been a party to a lawsuit?</p> <p>15 A No.</p> <p>16 Q Okay. So I want to talk a little bit about how you 17 prepared for this deposition today. Did you meet with 18 anyone in person, by phone, by Zoom, or in any other way 19 to prepare for this deposition?</p> <p>20 A Nope.</p> <p>21 Q I'm going to ask you this and be very clear, I'm not 22 asking about the content of any of your conversations, but 23 did you have any meetings with an attorney to prepare for 24 this deposition?</p> <p>25 A Other than with Drew the other day as far as making</p>	<p>1 sure that I'm not apprehensive or anything like that, you 2 know, that was it.</p> <p>3 Q Okay. And how many times did you meet with Drew -- 4 and that's Drew Stokesbary, your attorney -- to prepare 5 for this deposition?</p> <p>6 A Just that one time, yeah.</p> <p>7 Q Okay. And was anyone other than yourself and Drew 8 present for that meeting?</p> <p>9 A I can't remember what his name was, but there was 10 another person there.</p> <p>11 Q And was that an attorney or someone who wasn't an 12 attorney?</p> <p>13 A I think it was an attorney, yes.</p> <p>14 Q Okay. About how long did that meeting last?</p> <p>15 A Fifteen, 20 minutes.</p> <p>16 Q Did you review any documents during that meeting?</p> <p>17 A No.</p> <p>18 Q Did you take any notes during the meeting?</p> <p>19 A No.</p> <p>20 Q Other than your attorneys, did you discuss this 21 deposition with anyone else?</p> <p>22 A Nope.</p> <p>23 Q You didn't discuss it with any commissioners from 24 the Redistricting Commission?</p> <p>25 A No. I didn't talk to anybody, no.</p>
Page 11	Page 12
<p>1 Q How about any of the commission staff?</p> <p>2 A No.</p> <p>3 Q Any members or representatives of a political party?</p> <p>4 A Nope.</p> <p>5 MR. STOKESBARY: Objection as to form, 6 vague.</p> <p>7 Q (By Ms. Leeper) Did you discuss this deposition with 8 any legislators?</p> <p>9 A No.</p> <p>10 Q Mel, are you familiar with an individual named 11 Paul Campos?</p> <p>12 A Oh, yes, ma'am. He's my brother.</p> <p>13 Q And your brother was employed by the Senate 14 Republican Caucus working on the 2021 redistricting 15 process; is that right?</p> <p>16 MR. STOKESBARY: Objection --</p> <p>17 A Yes.</p> <p>18 MR. STOKESBARY: -- as to form.</p> <p>19 Q (By Ms. Leeper) I'm sorry, your answer got cut off, 20 Mel. What was your answer?</p> <p>21 A No. Sorry. What was the question? I'm sorry, it 22 was jumping around.</p> <p>23 Q Yeah, of course. The question was whether your 24 brother was employed by the Senate Republican Caucus 25 working for the 2021 redistricting process.</p>	<p>1 A Yes.</p> <p>2 Q Okay. Did you discuss this deposition with your 3 brother?</p> <p>4 A No, other than -- Well, no.</p> <p>5 Q You said "other than." What was that that you were 6 thinking there?</p> <p>7 A When this process started they were asking for 8 documentation, or I forget what the wording was, but 9 communications or whatever; and in that I got -- I said, 10 "Hey, Paul, did we ever discuss the redistricting process 11 that you're in, and as far as the 15th District? And did 12 we send anything?" And he said, "No, we haven't discussed 13 it."</p> <p>14 Other than the political conversation we had with 15 politics, we never remembered or recalled any 16 communications per this redistricting issue.</p> <p>17 Q Okay. So I want to dive into sort of some subparts 18 there just to get some clarification.</p> <p>19 Who was asking for that documentation?</p> <p>20 A I'm thinking Drew.</p> <p>21 Q Okay. And you said that you spoke with Paul about 22 how you guys hadn't talked about redistricting outside of 23 I think you said the political parts of it.</p> <p>24 What did you mean by that?</p> <p>25 A Oh. We're Republicans, and we discuss politics.</p>

3 (Pages 9 to 12)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376



Ismael G. Campos

October 13, 2022

Page 13	Page 14
1 Q Okay. And did you talk about that sort of in the	1 besides your counsel to prepare for this deposition?
2 context of redistricting?	2 A Nope.
3 A No, no, no. Just politics in general. That's what	3 Q Did you review any documents in preparation for this
4 we do. We're Republicans. We discuss everything from --	4 deposition?
5 just stuff.	5 A Just the document that Drew sent me as far as the --
6 Q Okay. And did you ever talk about politics in the	6 What's it called? The -- I don't know what the document
7 context of Legislative District 15?	7 is called. The -- Where it explains what the plaintiffs
8 A No. Well, --	8 are doing and this stuff, and that I'm the intervenor and
9 Q And did you --	9 yada yada.
10 A Hold on.	10 Q Okay. Was that to your knowledge like a legal
11 Q Sorry. Please continue.	11 filing in this case?
12 A Other than the fact that I was considering running	12 A What's that?
13 there, and I asked what his opinion would be; but as far	13 Q Was that a legal filing in this case that you
14 as the redistricting itself, no. I'm sorry.	14 reviewed?
15 Q Okay. I'll probably ask you some more questions	15 A Yeah, I'm assuming. Yeah.
16 about that later on, but right now just a few more	16 Q Okay. Did you receive a copy of that document from
17 questions on this point.	17 Mr. Stokesbary?
18 Did you ever have discussions with your brother	18 A Yes.
19 about how redistricting might impact sort of Republicans	19 Q And do you have that document with you today?
20 in Washington?	20 A Well, it's on my screen behind your -- that -- this
21 A No.	21 Zoom meeting.
22 Q Okay. Is there anyone else that you spoke with	22 Q Okay. So on that note, what do you have open on
23 about this deposition?	23 your browser right now?
24 A Nope.	24 A Actually, I think it's where Drew sent me the phone
25 Q Have you had any written communications with anyone	25 for this. Actually, I don't have it up.
Page 15	Page 16
1 Q Okay. And is there anything else, any other windows	1 much for doing that. I appreciate it.
2 visible for you right now?	2 So even if not in preparation for this deposition,
3 A My calendar, Zoom meeting, my email, and then that's	3 have you reviewed any documents filed in this case?
4 it.	4 A No.
5 Q Okay. And any papers in front of you?	5 Q Have you reviewed the Complaint in the case?
6 A No. It's just a lot of stuff.	6 A I don't know the document that Drew sent me to, you
7 Q Okay. So just for the purposes of while we're in	7 know, explain that I'm an intervenor and that kind of
8 this deposition, it's sort of a closed room. So if you	8 thing. I don't know what, if that's a Complaint or not.
9 could go ahead and close your email; and if you have like	9 Q Okay. So besides the meeting that we already
10 a Mac and you're able to see your texts and things coming	10 discussed with Drew, what else did you do to prepare for
11 up on your screen, if you could go ahead and close that	11 this deposition?
12 out, too, that would be appreciated.	12 A Prayed. That was it. Nothing.
13 A Close my email is what you're asking?	13 Q Okay. It's never bad to have God on your side.
14 Q Yes, please.	14 A There you go.
15 A If I hit the post-attendee Zoom, would that kick you	15 Q About how long in total do you think that you spent
16 guys out?	16 preparing for this deposition?
17 Q No, it won't. If that's your web browser that's	17 A Fifteen minutes reading that document, 20.
18 open and it says post-attendee Zoom, it's sort of like --	18 Q Okay. So earlier we touched on the fact that your
19 There's a blue button in the middle usually. If you can X	19 brother, Paul Campos, was a staffer for the House
20 out of that, there's no problem there.	20 Republican Caucus during the 2021 redistricting process;
21 A Microsoft Home, if I X out of that it won't kick you	21 correct?
22 out?	22 A Yes.
23 Q It will not.	23 Q Have you ever discussed anything related to this
24 A All right. It's the computer screen with clouds.	24 case with him?
25 Q Okay. Great. It's just us now. Thank you very	25 A Nope.

4 (Pages 13 to 16)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

Page 17	Page 18
<p>1 Q Did you speak with your brother regarding the 2021</p> <p>2 redistricting process in Washington state?</p> <p>3 A No.</p> <p>4 Q What do you know about your brother's work related</p> <p>5 to redistricting in Washington?</p> <p>6 A Only that he is the Republican side of</p> <p>7 redistricting.</p> <p>8 Q Do you know anything about what he does in the</p> <p>9 context of his job?</p> <p>10 A I mean, he's a -- What's it called? Ops manager or</p> <p>11 something like that at the capitol, or -- I forget what</p> <p>12 his title is, but I know he works there. And he gives us</p> <p>13 tours, and I think he runs errands for the senators, I</p> <p>14 think, stuff like that.</p> <p>15 Oh, he manages the office, where the offices go for</p> <p>16 the senators. He has to do with the Historic Society</p> <p>17 because I guess you can bring back and forth old stuff</p> <p>18 from years ago from the historic room and put it outside</p> <p>19 for people to see. I'm sorry. I mean, that's --</p> <p>20 Q No, don't be sorry at all.</p> <p>21 Is there anything specifically as it relates to</p> <p>22 redistricting that you know about --</p> <p>23 A Oh.</p> <p>24 Q -- the sort of job duties that your brother has?</p> <p>25 A No.</p>	<p>1 Q Do you know Jim Honeyford?</p> <p>2 A Jim?</p> <p>3 Q Yes.</p> <p>4 A Yeah, I -- Yes.</p> <p>5 Q How do you know him?</p> <p>6 A He was a senator from Yakima. Years ago we met at a</p> <p>7 coffee shop for discussing -- oh, I can't remember what.</p> <p>8 I met him at different meetings with the representatives</p> <p>9 and politicians there in Yakima, just off and on meetings,</p> <p>10 situations like that.</p> <p>11 Q And when you met with him was that in your personal</p> <p>12 capacity or in connection with some group that you're a</p> <p>13 part of?</p> <p>14 A Well, I'm part of -- was part of the Yakima/Morelia</p> <p>15 Sister City organization there in Yakima, and we'd go --</p> <p>16 (Court reporter request for clarification.)</p> <p>17 A Morelia, sister city.</p> <p>18 Q And could you spell that for Jeanne? She is, I</p> <p>19 think, certified only in English, and that sounds like it</p> <p>20 might be a Spanish word.</p> <p>21 A Morelia is the capitol of Michoacán, M-O-R-E-L-I-A.</p> <p>22 THE REPORTER: Thank you.</p> <p>23 Q Thanks, Mel.</p> <p>24 And you were explaining sort of what that group</p> <p>25 entails. Could you let me know?</p>
<p data-bbox="711 1014 828 1045">Page 19</p> <p>1 A Well, we establish cultural connections, business</p> <p>2 connections with the capitol in Morelia, in Michoacán</p> <p>3 there, Morelia. The organization donated several fire</p> <p>4 engine trucks. We've donated wheelchairs. And me and my</p> <p>5 wife ended up going down there to Morelia to visit their</p> <p>6 facilities there.</p> <p>7 The mayor and council people have come to Yakima,</p> <p>8 and we toured them Yakima. We toured the capitol there,</p> <p>9 and Paul gave us a tour of the whole capitol. And for</p> <p>10 that occasion, since Paul is my brother, we mentioned that</p> <p>11 we were coming by, and they -- What's it called? The</p> <p>12 people that came over, the committee that came over were</p> <p>13 really impressed that the Mexican flag was at the same</p> <p>14 height as the American flag, and they were pretty</p> <p>15 impressed with that.</p> <p>16 You know, most of the times other flags are below</p> <p>17 the U.S., but this time they were equal there. They</p> <p>18 thought it was cool and took pictures of it and all, but</p> <p>19 anyway. But yeah, that's what we did.</p> <p>20 Q Okay. And so that was when you were meeting with</p> <p>21 Senator Honeyford, it was sort of about that, I guess sort</p> <p>22 of a sister city program?</p> <p>23 A Yeah. When we were there I went there, yeah, and</p> <p>24 just, you know, encouraged him to join our -- not join,</p> <p>25 but be aware of our meetings. And, of course, the</p>	<p data-bbox="1328 1014 1445 1045">Page 20</p> <p>1 meetings that I went to with the other senators, I went</p> <p>2 there as an interested party, as a Republican, just kind</p> <p>3 of support.</p> <p>4 Q And did Senator Honeyford start coming to those</p> <p>5 meetings?</p> <p>6 A He was there at that meeting. Well, not to our</p> <p>7 Morelia Sister City meetings at all. I went there, you</p> <p>8 know, representing not only myself but the organization.</p> <p>9 Q Okay. Have you ever met with Senator Honeyford</p> <p>10 about anything else?</p> <p>11 A Nope.</p> <p>12 Q Have you ever discussed anything related to this</p> <p>13 lawsuit with Jim Honeyford?</p> <p>14 A Oh, not at all. I haven't talked to Jim in two</p> <p>15 years, three years. I don't know.</p> <p>16 Q Have you discussed -- Have you ever discussed</p> <p>17 redistricting with him?</p> <p>18 A No, not at all.</p> <p>19 Q Did you know that Senator Honeyford was retiring?</p> <p>20 A Yes.</p> <p>21 Q And how did you find that out?</p> <p>22 A I didn't know he was retiring. I know he retired.</p> <p>23 Q Okay. And when did you find out that he was</p> <p>24 retiring?</p> <p>25 A I knew he retired after he announced it.</p>

5 (Pages 17 to 20)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

Page 21	Page 22
1 Q Okay. So did you find out from the announcement?	1 A No. No. It's just the fact that she was on the
2 A That he had retired, yes.	2 Chamber. I don't know what affiliation she was, whether
3 Q And what do you recall --	3 she was Democrat or Republican, I guess, kind of thing,
4 A Not before.	4 but yeah, no.
5 Q -- hearing about it?	5 Q Okay. I just want to jump back a bit. So we were
6 A I heard after, after he retired that he -- Senator	6 talking about the sister cities program; and I wanted to
7 Honeyford retired and -- Yeah.	7 sort of ask you, I guess it seems like you think that work
8 Q Okay. Do you know Nicki Torres?	8 is important since you're involved in it, and I just
9 A Yes, I do.	9 wanted to know why.
10 Q How do you know her?	10 A Which program?
11 A Well, she lived in Pasco, and she was president of	11 Q The sister cities program with Morelia.
12 the Chamber. I forget what the title is, the Latino or	12 A Oh, okay. Yeah. What about it?
13 Hispanic Chamber. And so I'd go to the meetings, and	13 Q I guess why do you think it's important, if you do?
14 she'd be there. And we know her, as far as	14 A Oh, just because I like their -- what would you call
15 professionally, like the luncheons and the Hispanic	15 it -- their mission of establishing connections --
16 Chamber meetings and stuff like that.	16 business, cultural, educational connections between Sister
17 Q And have you ever discussed anything related to	17 City Morelia and Yakima. I think it's a great
18 redistricting with Nicki Torres?	18 opportunity, and if we can help, you know, more power to
19 A Oh, no. I haven't talked to her since before COVID.	19 the organization.
20 Q How about this lawsuit then?	20 Q Okay, Mel, I just want to ask you some questions now
21 A No.	21 focusing in a bit on this case.
22 Q Are you aware of Nicki Torres's political	22 How did you come to be involved in this case?
23 affiliation?	23 A Well, the -- I got talking to Jim Troyer about
24 A No. No. Yeah.	24 possibly running for office, and then in the conversation
25 Q Did you have a thought there?	25 mentioned that this redistricting issue had come up with
Page 23	Page 24
1 the redistricting being -- what's the right word --	1 A Oh, I don't know. Whoever the powers would be that
2 racially redrawn, and if I'd like to be a part of this. I	2 redrew the district.
3 guess you want to call it a lawsuit.	3 Q Am I understanding you to say that the redistricting
4 And because I'm Republican and I thought that it's a	4 issue that you saw at the center of this case was the way
5 legitimate position, I said yes.	5 that those lines had been drawn?
6 Q Okay. So a couple of questions about that. You	6 A Right.
7 said that the redistricting issue was sort of about the	7 Q Okay. So you said that sort of because you're
8 map being racially redrawn.	8 Republican and you thought that it was a legitimate
9 What do you understand racially redrawn to mean?	9 position, you decided to jump in.
10 A Just that it was redrawn to the effect that it was	10 In your words how would you encapsulate that
11 redrawn based on the population of the Hispanic community.	11 legitimate position?
12 Q Okay. And how would you identify that as being	12 A Because it's assumed that Latinos vote Democrat, if
13 connected to the redistricting issue that's at the center	13 you overweight the Latino community in that district,
14 of this case?	14 you're -- what's the right word -- loading the district in
15 MR. STOKESBARY: Objection, calls for a	15 a Democrat position based on the fact that it's Latinos.
16 legal conclusion.	16 And so anyways, that to me is kind of like a racial
17 Q (By Ms. Leeper) You can answer, Mel.	17 weighting.
18 A I'm sorry. Let me hang up. I'm getting a call over	18 Q Okay. So I'll get back into later we might have a
19 here. Let me -- It's beeping here. It's a client.	19 discussion about sort of how Latinos vote and things that
20 I'm sorry. Ask the question again.	20 might dig into a little bit more of your views on that
21 Q Yes. How would you see that issue of the map being	21 issue, but for now I just want to go back to specifically
22 racially -- Actually, let me break this question down into	22 talking about sort of the origins of coming into this
23 parts.	23 lawsuit.
24 When you say that the map was racially redrawn, who	24 You said that you spoke with I believe it was
25 are you referring to doing that drawing?	25 Jim Troyer about running for office; is that correct?

6 (Pages 21 to 24)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Page 25	Page 26
<p>1 A Correct.</p> <p>2 Q And who is Jim Troyer?</p> <p>3 A I don't know exactly his position, but he's -- every</p> <p>4 now and then will call me to ask me for possible electable</p> <p>5 Hispanic candidates.</p> <p>6 Q Okay. And do you know if Mr. Troyer is an employee</p> <p>7 of the state Republican party?</p> <p>8 A I don't know if he's an employee of the party. I</p> <p>9 don't know.</p> <p>10 Q Is he to your understanding affiliated with the</p> <p>11 Republican party?</p> <p>12 A Oh, yes.</p> <p>13 Q And do you know if he's an elected official?</p> <p>14 A He is not an elected official as far as I know.</p> <p>15 Q How long have you been in contact with Mr. Troyer?</p> <p>16 A Oh, gosh. I don't know. It's been years. I want</p> <p>17 to say probably six years maybe, five, six years, maybe</p> <p>18 longer.</p> <p>19 Q Okay. And you --</p> <p>20 A He will call me every now and then. I'm sorry. Go</p> <p>21 ahead.</p> <p>22 Q No, please continue.</p> <p>23 A Yeah, he just calls me now and then, again to ask me</p> <p>24 for electable candidates.</p> <p>25 Q And can you remember any of the names of electable</p>	<p>1 candidates that you provided to him?</p> <p>2 A Saul Martinez would be one. Oh, gosh. I think in</p> <p>3 Sunnyside, I think -- I want to say his name is Almeida.</p> <p>4 Raul Almeida I think is his first name. Yeah, I don't</p> <p>5 remember. I'm trying to think of others.</p> <p>6 Angel Garza from Othello. Yeah.</p> <p>7 Q And when you've spoken with Mr. Troyer, has he been</p> <p>8 seeking electable candidates for any particular political</p> <p>9 offices?</p> <p>10 A No, no, just electable for -- to have in his book of</p> <p>11 reference, I guess, for positions that may be coming up in</p> <p>12 the different districts here in our area.</p> <p>13 Q And has he ever spoken to you about sort of</p> <p>14 specifically looking for electoral candidates who might be</p> <p>15 from the Hispanic community?</p> <p>16 A Yeah.</p> <p>17 Q And is that mainly what he's been asking? Those are</p> <p>18 the sorts of candidates that he has been talking to you</p> <p>19 about?</p> <p>20 A Ask the question again. You were kind of mumbled.</p> <p>21 Q Yeah. Has he mainly come to you to ask for Hispanic</p> <p>22 electable candidates?</p> <p>23 A Yes.</p> <p>24 Q Have you had any conversations about why those are</p> <p>25 the candidates he has been seeking?</p>
Page 27	Page 28
<p>1 A Probably more because I might have gotten in touch</p> <p>2 with him because I think Latinos should be more prominent</p> <p>3 in the political scene, and I think, you know, Latinos</p> <p>4 should be elected.</p> <p>5 Q Can I ask why?</p> <p>6 A Well, because we're a significant portion of the</p> <p>7 community here, and I think we should have more</p> <p>8 representation.</p> <p>9 Q And why is that representation important?</p> <p>10 A Well, because everybody needs representation in</p> <p>11 the -- in the offices.</p> <p>12 Q And having the representation for the Latino</p> <p>13 community of specifically Latinos in office, would you say</p> <p>14 that is important?</p> <p>15 A Well, yes.</p> <p>16 Q Why is having Latinos in office representing Latinos</p> <p>17 important in particular? Why would Latinos, if you think</p> <p>18 so, be well suited to that role?</p> <p>19 A Well, for one I think the Republican party values</p> <p>20 mirror our values, you know, as much.</p> <p>21 Q So do you think that Latinos are more likely to</p> <p>22 share values with other Latinos?</p> <p>23 A Yes.</p> <p>24 Q What are some of the main values that you would say</p> <p>25 Latinos have?</p>	<p>1 A In general we are pro life, pro normal marriage.</p> <p>2 Q And sort of what's the basis for your understanding</p> <p>3 of those issues as the issues of Latino voters?</p> <p>4 A Say again? What's the issue?</p> <p>5 Q What's the basis of your understanding or belief</p> <p>6 that those are the main issues that Latino voters care</p> <p>7 about?</p> <p>8 A Well, I mean, I wouldn't necessarily say that</p> <p>9 they're the main issues because Latinos are very business</p> <p>10 oriented, so -- and I think the Republican party mirrors</p> <p>11 the importance of businesses. And added to that, the fact</p> <p>12 that the values of Latinos are generally conservative.</p> <p>13 Q Okay. And just to be clear, I'm asking sort of the</p> <p>14 basis of your understanding. I'm talking sort of about if</p> <p>15 this is coming from surveys or if it's coming from</p> <p>16 conversations you've had, or from looking at data.</p> <p>17 So with that understanding, I'm going to ask again</p> <p>18 sort of what's the basis of your belief that those are</p> <p>19 important issues to the Latino community?</p> <p>20 A The most important factor is the fact that I'm</p> <p>21 Latino. I mean, I don't need surveys to understand my</p> <p>22 community. And most of us are Catholic or evangelical,</p> <p>23 and those are pretty important values that mirror pro</p> <p>24 life, you know, pro marriage.</p> <p>25 And so I don't necessarily base it on any surveys,</p>

<p>Page 29</p> <p>1 other than the fact that I've been Latino all my life, and                  2 most of my association has been with the Latino community.                  3 Church, I'm a devout churchgoer. Based on that.                  4 Q Okay. So sort of your lived experience and the                  5 religious values that you hold is the basis.                  6 Is that a good summation?                  7 A Yeah.                  8 Q Okay.                  9 A Yes. Sorry.                  10 Q Don't worry. Yeah is okay. As long as it's not a                  11 nod, yeah is perfectly fine. You don't -- I'm not going                  12 to police the formality of the affirmative.                  13 Okay. So I'm going to loop back a little bit and                  14 talk about your first becoming involved in this case. You                  15 said that it was originally brought up to you by                  16 Jim Troyer when you were just having a discussion with him                  17 about running for office; is that correct?                  18 A Correct.                  19 Q And what office were you discussing running for?                  20 A The -- Senator Jim's office.                  21 Q And would that be Legislative District 15?                  22 A Yes, but add to that the fact that running here in                  23 my 8th district, also.                  24 Q And what Legislative District are you in?                  25 A Eighth, as far as I know.</p>	<p>Page 30</p> <p>1 Q And when did that conversation happen with Jim                  2 Troyer?                  3 A Oh, jeez. Well, this conversation started I'm going                  4 to say probably last November as far as, you know, when it                  5 first came up.                  6 Q And is that the first time that you'd spoken with                  7 Mr. Troyer about running for office in LD 15?                  8 A No. In the past bunch of years the idea of running                  9 for office has been mentioned, you know, me and my wife                  10 and so on.                  11 Q And apart from discussions between you and your                  12 wife, who else has mentioned the idea of you running for                  13 office in LD 15?                  14 A I don't know that me and my wife discussed running                  15 for office in 15, just in general running for office in                  16 the past years, you know.                  17 I've always thought that she's very likeable and                  18 outgoing, and she's pretty well known in the community.                  19 So I've always thought she would be. She's never been                  20 receptive to the idea, anyway, but yeah.                  21 Q Well, outside of the specific district, is the                  22 office that you discussed running for, that you discussed                  23 your wife running for, has that pretty much always been a                  24 legislative office, or have there been other offices?                  25 A Any office, yeah.</p>
<p>Page 31</p> <p>1 Q Local office?                  2 A Just running in general. I'm sorry.                  3 Q Any particular offices that you guys have talked                  4 about?                  5 A No. No, just running for office.                  6 Actually, Sharon Brown, Senator Sharon Brown, you                  7 know, we -- Her and my wife kind of got to be not good                  8 friends but, you know, friends via Facebook and stuff.                  9 And years ago Senator Sharon suggested Gracie kind of --                  10 what's the word when you follow the person around at                  11 work -- shadow, I think.                  12 Yeah, but Gracie was never receptive to that. She                  13 said, "Mel, I don't want to run." Okay. So anyway.                  14 Q Okay. And Senator Sharon Brown, do you know what                  15 district she represents or represented?                  16 A I want to say the 8th, I think. We've lived in                  17 Pasco, Kennewick and Richland, so whatever district she                  18 was representing. We got to know her fairly well -- not                  19 fairly well, you know, just got to know her.                  20 Q Okay. And so you've mentioned Jim Troyer and                  21 Sharon Brown. Who else have you spoken with about you                  22 running for office?                  23 A Oh, friends at work. I mean, a couple of them are                  24 Democrats, and they've told me would never vote for me.                  25 We're good friends, but anyway.</p>	<p>Page 32</p> <p>1 Q I'm sure you appreciate the honesty.                  2 Have you ever spoken with your brother about running                  3 for office?                  4 A Yeah. I mean, I'm sure I have.                  5 Q Has he ever expressed to you any particular office                  6 that he thinks you'd be good to run for?                  7 A Oh, no, not as far as specifics, but he says, "Hey,                  8 Mel," -- You know, I've always felt a little not --                  9 underqualified, I guess, for running for senator or, you                  10 know, representative, and he goes, "Mel, you're probably                  11 overqualified."                  12 But anyways, just generally stuff like that.                  13 Q Okay. And so we've talked about it sort of in                  14 general terms, but I want to go back to the conversation                  15 that you had with Jim Troyer.                  16 What specifically did you discuss about running?                  17 And I think that conversation you said was LD 15.                  18 A Well, in our discussions I've always felt that                  19 Gracie, my wife, would make a better candidate. And so                  20 he's asking me for, you know, candidates and stuff.                  21 And he's always kind of suggested that I could run,                  22 and so in that conversation back in November, whenever it                  23 was, I go, "Well, how do you feel about myself?" And                  24 Gracie didn't want to. And he said, "I'm not calling you                  25 just because. I think that you would be a great</p>

Page 33	Page 34
<p>1 candidate." So that was the gist of it all, I guess.</p> <p>2 Q And if you don't mind me asking, what is your wife's</p> <p>3 race?</p> <p>4 A My wife's what?</p> <p>5 Q Race.</p> <p>6 A Race? Mexican. I mean Latino or Hispanic.</p> <p>7 Jalapeño is pretty good, too.</p> <p>8 Q There's a lot of terms, I know. Yeah, I know. I</p> <p>9 prefer Latino, but my mom prefers Hispanic. It's like a</p> <p>10 very personal thing, I know.</p> <p>11 A Yes, either one. And, of course, I'm proud to be</p> <p>12 Mexican, so I'm definitely comfortable being called a</p> <p>13 Mexican.</p> <p>14 Q I love that.</p> <p>15 Okay. Did you suggest any other candidates to</p> <p>16 Jim Troyer for LD 15?</p> <p>17 A Yes. Angel Garza. I think I suggested -- I want to</p> <p>18 say his first name is Raul Almeida. I think Hector Garza</p> <p>19 from Wapato, if I remember.</p> <p>20 Oh, gosh. I might have suggested my brothers</p> <p>21 because they're down there in Yakima, but neither of them</p> <p>22 are interested in it. But that's all I can remember,</p> <p>23 really. I don't remember.</p> <p>24 Q Okay. And you said that you live in LD 8; correct?</p> <p>25 A I'm sorry?</p>	<p>1 Q You mentioned that you live in Legislative District</p> <p>2 8; is that correct?</p> <p>3 A Yes. Yes.</p> <p>4 Q And was that one of the reasons why you couldn't run</p> <p>5 in Legislative District 15?</p> <p>6 A Right. Yeah. And I looked into the possibility of</p> <p>7 moving over in time so that, you know, it wouldn't be an</p> <p>8 issue into the 15th District, by in the end because of</p> <p>9 my -- I inherited a ranch in Mexico, and so in the end we</p> <p>10 concluded that I was going to be spending the winters over</p> <p>11 there. And so that's when the legislature is in session,</p> <p>12 so I kind of thought well, maybe that's not such a good</p> <p>13 idea.</p> <p>14 Q Okay. And if the lines were to be redrawn at some</p> <p>15 point in time, in a decade or something like that, and you</p> <p>16 were to be placed in Legislative District 15 instead of</p> <p>17 Legislative District 8, do you think that that would lead</p> <p>18 to any sort of harm to you?</p> <p>19 A Well, if the Latino community is just generally</p> <p>20 thought to vote Democrat and I'm running as a Republican,</p> <p>21 then yeah. I mean, I would think that that would affect</p> <p>22 me.</p> <p>23 Q Okay. So that's the way it would affect you might</p> <p>24 be in the partisan lean of a particular district; is that</p> <p>25 correct?</p>
Page 35	Page 36
<p>1 A Correct. Yeah.</p> <p>2 Q And do you think that a district that might have</p> <p>3 sort of a larger quantity of Latinos in it might be less</p> <p>4 likely to elect a Republican?</p> <p>5 A Oh, I don't know. Again, I get back to the idea</p> <p>6 that Republicans are conservative. Most Hispanics are</p> <p>7 conservative, and I think that -- I quote President Reagan</p> <p>8 where he would say, "Most Latinos are Republican. They</p> <p>9 just aren't aware of it yet," so --</p> <p>10 So I think hopefully I would have the character and</p> <p>11 the ability to convince them that we are a conservative</p> <p>12 party.</p> <p>13 Q But so the potential harm that would come, though,</p> <p>14 would be because of the potential partisan differences in</p> <p>15 that district; is that correct?</p> <p>16 A Correct. Yeah.</p> <p>17 Q Have you ever spoken with Jim Troyer when you talked</p> <p>18 about running for Legislative District 15, did you talk</p> <p>19 about what running for that district might entail?</p> <p>20 A Oh, yes. Yeah.</p> <p>21 Q And what did that discussion include?</p> <p>22 A Well, my biggest concern was how much out-of-pocket</p> <p>23 money it would take, and he would say it just depends on</p> <p>24 if I can raise enough campaign funds to pay for the</p> <p>25 campaign, so --</p>	<p>1 Q Did you raise the --</p> <p>2 A Time. Time, also, as far as campaigning, in</p> <p>3 which -- Again, because of my personal commitment to spend</p> <p>4 more time at Grandpa's ranch, that might affect</p> <p>5 campaigning, raising campaign funds.</p> <p>6 Q And did you have any discussion about sort of how</p> <p>7 much money is typically needed to launch a campaign?</p> <p>8 A He -- Yeah. He said it could entail nothing, again</p> <p>9 because I would raise the funds for it. And there have</p> <p>10 been candidates that have put money out of their pockets,</p> <p>11 so --</p> <p>12 Q And whether it comes from your pocket or from a</p> <p>13 funder, you know, raising money, did he say sort of how</p> <p>14 much these things tend to cost?</p> <p>15 A I don't remember a specific amount.</p> <p>16 Q Do you recall like a ballpark?</p> <p>17 A Somehow a hundred thousand rings a bell, but again,</p> <p>18 I don't know.</p> <p>19 Q Okay. Besides fundraising, what else did you</p> <p>20 discuss that running for office might entail?</p> <p>21 A The time. The time, again. Also the fact that --</p> <p>22 Of course, I didn't care because I think I'm a pretty open</p> <p>23 book -- the fact that it could get -- what's the right</p> <p>24 word? Where the people dig up dirt and stuff like that,</p> <p>25 which that to me was a lesser concern, but yeah.</p>

Page 37

1 Q Do you see the financial cost of campaigns as a  
 2 barrier for people running for office?  
 3 A Well, in my case -- Well, yeah. I mean, I think --  
 4 I think if it takes out-of-pocket expense, then yeah, it  
 5 could be a hindrance for people.  
 6 Q Um-hmm. Do you think that that might be one factor  
 7 that leads to less Latinos running for office?  
 8 MR. STOKESBARY: Objection, calls for  
 9 speculation.  
 10 A Oh, I don't know.  
 11 Q (By Ms. Leeper) Okay. Were you familiar --  
 12 Actually, did you talk with your brother at all about the  
 13 decision to become an intervenor in this case?  
 14 A Yes. And he said, "If you're going to do that, we  
 15 should probably not discuss anything from" -- you know,  
 16 "about this."  
 17 Q Outside of the content of redistricting, but just in  
 18 general about the concept of being an intervenor, did your  
 19 brother encourage you to be an intervenor in the case when  
 20 you discussed it with him?  
 21 A Oh, no, not at all. No.  
 22 Q Did he express any kind of opinion about whether or  
 23 not you should intervene in the case?  
 24 A No, not at all.  
 25 Q Did he discuss with you anything about the general

Page 39

1 well enough to make that assumption, I guess is the right  
 2 word.  
 3 Q I guess why did you think that she wasn't a  
 4 Republican?  
 5 A Well, again, because most of the political -- and I  
 6 shouldn't say political. The assumption that being  
 7 involved in the Hispanic Chamber and the leanings towards  
 8 the Chamber just seemed to be liberal.  
 9 Q And is there -- Was there anything else that  
 10 surprised you about Nicki Torres running?  
 11 A No, just surprised that -- again, that it was on the  
 12 Republican side, which, you know, I was pleasantly  
 13 surprised. I mean, I'm glad. I mean, I think she's a  
 14 great lady from what I know of her, and I think she'll  
 15 make a great candidate.  
 16 Q And did Jim Troyer tell you sort of how Nicki Torres  
 17 came to run? He didn't get the name from you.  
 18 Did he tell you anything about sort of how she had  
 19 come into the mix?  
 20 A No.  
 21 Q Okay. Were you familiar with Drew Stokesbary prior  
 22 to this case?  
 23 A No. I gotta make sure that was his last name, but  
 24 yes.  
 25 Q Yeah.

Page 38

1 concept of what he thought about having intervenors in  
 2 this case?  
 3 A I don't think he even knew what an intervenor was,  
 4 but he said if I was going to be involved in any -- he  
 5 didn't say -- in any things to do with redistricting and  
 6 that, because he does that, we probably shouldn't discuss  
 7 anything about it.  
 8 Q Okay. Why didn't you ultimately run for LD 15?  
 9 A Why would I ultimately run?  
 10 Q Why did you not ultimately run this cycle?  
 11 A Oh, because of my commitments to my Grandpa's ranch,  
 12 spending more time in Mexico. Especially during the  
 13 session portion of it because again, I have been and would  
 14 like to continue to spend the winters down there, which  
 15 includes January, February, which is when Olympia is in  
 16 session, so --  
 17 Q Did you have any discussions with anyone about Nicki  
 18 Torres running for LD 15?  
 19 A No.  
 20 Q Did Jim Troyer ever ask you about Nicki Torres?  
 21 A Yes, he might have. And I think because one of  
 22 the -- In our discussions as far as candidates, Nicki  
 23 hadn't come up. And so I was surprised that when she did  
 24 decide to run that she ran, because I didn't think she was  
 25 a Republican; but I never really had gotten to know her

Page 40

1 A Not at all.  
 2 Q How did you first come into contact with  
 3 Mr. Stokesbary?  
 4 A I think Drew called me because of being named as an  
 5 intervenor.  
 6 THE WITNESS: Am I correct, Drew?  
 7 A I don't remember.  
 8 Q Oh, so just for your purposes, so that you know that  
 9 Drew is not being rude. For purposes of the deposition  
 10 Drew can issue objections, but sort of can't --  
 11 A Oh.  
 12 Q -- enter the conversation. So he's not being rude.  
 13 He's just respecting the platform we're in.  
 14 MR. STOKESBARY: Thanks, Simone.  
 15 A Okay. Sorry.  
 16 Q (By Ms. Leeper) No problem.  
 17 A Sorry.  
 18 Q It's all very formal and silly sometimes. So I just  
 19 thought I'd let you know.  
 20 A Yeah.  
 21 Q Okay.  
 22 A I just -- I just don't remember how we came in  
 23 contact.  
 24 Q Okay. And do you recall how Mr. Stokesbary got your  
 25 phone number? Did he tell you?

Ismael G. Campos

October 13, 2022

Page 41	Page 42
1 A I don't remember.	1 A I don't know. I'm assuming it could be. I just
2 Q Okay. And so to your knowledge did anyone refer	2 know him as Jim.
3 Mr. Stokesbary to you?	3 Q But you just know him as Jim?
4 A I don't know how the process works. I don't	4 A Yeah.
5 remember.	5 Q Got it.
6 Q Okay. And other than the conversation that you've	6 Okay. Are you familiar with an individual named
7 mentioned with Jim Troyer, did you have any discussions	7 José Trevino?
8 with anyone where they mentioned that they might refer you	8 A I know he's the representative, I think, in Quincy.
9 to be an intervenor in this case?	9 Q Okay.
10 A No.	10 A I -- There's two others. There's two others that
11 Q Okay. Have you ever discussed --	11 are involved in this; and one is a representative in
12 A I don't recall. That I recall, I haven't talked to	12 Quincy, and the other is a resident in Yakima, I think. I
13 anybody about this, about anything.	13 didn't read the specifics of it.
14 Q Okay. Have you ever discussed anything related to	14 Q Okay. And the other individual, would that be
15 the Garcia v. Hobbs case with Mr. Stokesbary?	15 Alex Ybarra?
16 MR. STOKESBARY: Objection, attorney-client	16 A Yeah, I think. I'm pretty sure, yes, that's the
17 privilege.	17 name.
18 Mel, I'm going to instruct you not to answer that	18 Q Do you personally know Mr. Trevino?
19 question because it inquires about our communications with	19 A No.
20 each other.	20 Q And how about --
21 THE WITNESS: Oh, okay.	21 A Okay. He might have been at one of the previous
22 MS. LEEPER: We can go ahead and move on.	22 Republican meetings, like in Yakima and, you know, in the
23 Q (By Ms. Leeper) One clarifying question I just want	23 years past. I haven't had any Republican meetings or
24 to ask for purposes of the record. Jim Troyer, his full	24 dinners or anything like that since pre COVID.
25 name is James Troyer; is that correct?	25 Q Okay. But you don't recall sort of having a
Page 43	Page 44
1 personal acquaintanceship with Mr. Trevino?	1 Q And have you heard of an organization called the
2 A No.	2 Southcentral Coalition of People of Color for
3 Q How about with Alex Ybarra?	3 Redistricting?
4 A No.	4 A No.
5 Q Okay. So I'm going to ask if you know any of the	5 Q Okay. Mel, I know this is a bit far in advance, but
6 plaintiffs in the lawsuit; and I'm going to assume that	6 it's when our trial is scheduled, which is why I'm asking
7 you don't know their names by heart, so I'll just go down	7 you this. Is there any reason that you can think of that
8 the list and ask.	8 you would be unavailable the weeks of May 1st and May 8h,
9 Do you know Susan Soto Palmer?	9 2023?
10 A No.	10 A Only if I got delayed at the ranch in Mexico, you
11 Q How about Alberto Isaac Macias?	11 know. As far as I know, we have been there May up to
12 A No.	12 June, you know, some of our trips. So no, and I couldn't
13 Q Faviola Lopez?	13 tell that far in advance, but I'm hoping that I can be
14 A No.	14 back by March/April timeframe.
15 Q Cathy Padilla?	15 Q Okay. But there's a potential that you might be at
16 A No.	16 your -- was it grandfather's ranch in Mexico?
17 Q Evangelina Aguilar? She goes by Benji.	17 A Yes.
18 A No.	18 Q Okay. Now, I have some more questions for you, but
19 Q Lizette Parra?	19 I'm wondering if now might be a good time for a quick
20 A No.	20 break.
21 Q How about Heliodora Morfin?	21 MS. LEEPER: Could we go off the record,
22 A I didn't hear the name, but it doesn't sound -- Say	22 Jeanne.
23 the name again. It doesn't --	23 (Discussion off the record.)
24 Q Heliodora Morfin.	24 (Break 10:29 a.m. to 10:42 a.m.)
25 A No.	25 MS. LEEPER: Okay. Let's go back on the

11 (Pages 41 to 44)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376



Ismael G. Campos

October 13, 2022

Page 45	Page 46
<p>1 record.</p> <p>2 Q (By Ms. Leeper) Okay. We are back on the record</p> <p>3 now, and so we're going to get back into it. I have a few</p> <p>4 more questions for you about sort of specific individuals.</p> <p>5 Do you know Benancio Garcia, III?</p> <p>6 A I didn't hear the first name, but I don't know.</p> <p>7 Q Okay. I'll say it one more time just to be sure,</p> <p>8 Benancio Garcia.</p> <p>9 A No.</p> <p>10 Q Okay. And do you know anything about the Garcia v.</p> <p>11 Hobbs case challenging Legislative District 15?</p> <p>12 A I don't know the names, but I'm assuming they're on</p> <p>13 the paperwork that Drew or paper -- whatever email that</p> <p>14 Drew sent me as far as the Complaint, or whatever it is.</p> <p>15 Q Okay. And that is, just to be clear, this case is</p> <p>16 the Soto Palmer v. Hobbs case. That's a separate case.</p> <p>17 That's Garcia v. Hobbs.</p> <p>18 A Oh.</p> <p>19 Q So are you familiar with that?</p> <p>20 A Not that I'm aware of, no. Again, I'm not --</p> <p>21 Q Okay.</p> <p>22 A -- a person that details that kind of -- or pays</p> <p>23 attention to the detail very much. So yeah, I don't know.</p> <p>24 Q Okay. And I will just ask it one more way that</p> <p>25 might, you know, sort of help shed some light without</p>	<p>1 using all the names.</p> <p>2 Are you familiar with a case that's separate from</p> <p>3 this case that is challenging Legislative District 15 as</p> <p>4 being a racial gerrymander?</p> <p>5 A I want to say in the conversations with I want to</p> <p>6 say Drew, something about a case in -- Oh, no, and it</p> <p>7 might have been in an email, this one here, where --</p> <p>8 MR. STOKESBARY: Hey, Mel -- Mel, I'm just</p> <p>9 going to jump in and say that I've got to instruct you not</p> <p>10 to talk about any conversations you've had with me or</p> <p>11 emails you've exchanged with me, --</p> <p>12 THE WITNESS: Oh.</p> <p>13 MR. STOKESBARY: -- on the basis of</p> <p>14 attorney-client privilege.</p> <p>15 THE WITNESS: Okay.</p> <p>16 Q (By Ms. Leeper) Yeah. And so basically I'm asking</p> <p>17 about the knowledge that you have, not about the specific</p> <p>18 content of any conversations you've had with your</p> <p>19 attorney, but sort of the knowledge that you do have</p> <p>20 about that case, which is challenging Legislative</p> <p>21 District 15 as a racial gerrymander.</p> <p>22 So what knowledge do you have about that?</p> <p>23 A About 15?</p> <p>24 Q About the case that is challenging that district as</p> <p>25 a racial gerrymander.</p>
Page 47	Page 48
<p>1 A Louisiana or Mississippi or something is challenging</p> <p>2 in court that may have an effect on this case, that maybe</p> <p>3 this case could be a midpoint, I guess is basically the</p> <p>4 gist of what I'm getting from that.</p> <p>5 Q Okay. And is that sort of about the challenging of</p> <p>6 Section 2 of the Voting Rights Act; is that right?</p> <p>7 A Again, I don't know the details. Sorry.</p> <p>8 Q Okay. And just again, not asking about the content</p> <p>9 of the conversation, but when have you talked with</p> <p>10 Mr. Stokesbary about that case?</p> <p>11 A Again, I don't know necessarily that it was Drew.</p> <p>12 Q Or one of your attorneys.</p> <p>13 A Yeah. Yeah. It was in the process of being asked</p> <p>14 whether I wanted to do this because in the end it may be</p> <p>15 not even come to fruition if that case is decided by the</p> <p>16 court, whatever court that is, whether it's the Supreme</p> <p>17 Court, or whatever.</p> <p>18 Q Okay. And was anyone else other than one of your</p> <p>19 attorneys present for that conversation?</p> <p>20 A Oh, no. No, I --</p> <p>21 Q Okay. And how many --</p> <p>22 A Again, I don't -- Yeah, I don't even know that --</p> <p>23 I can't remember who told me about that, honestly. I</p> <p>24 mean, I don't remember.</p> <p>25 Q Okay. All right. We're going to bring you back to</p>	<p>1 basics, Mel. We're going to talk a little bit about your</p> <p>2 educational and work background.</p> <p>3 Where did you go to high school?</p> <p>4 A White Swan High School, on the Reservation.</p> <p>5 Q And did you --</p> <p>6 A Yakama Reservation.</p> <p>7 Q Did you live in that area, you know, the whole time</p> <p>8 you were growing up?</p> <p>9 A Pretty much, yeah. I was born in '56 in Mexico. Dad</p> <p>10 brought us to Washington around about '58. I graduated</p> <p>11 from White Swan and then lived there until I was about 24,</p> <p>12 off and on, because I went to college in California for a</p> <p>13 while, came back.</p> <p>14 So yeah, that's where I was raised.</p> <p>15 Q Okay. I think that you just said this, but where</p> <p>16 did you go to college?</p> <p>17 A I went to college at Bethany Bible College in</p> <p>18 California for a year and a half. Oh, gosh. '79 and '80,</p> <p>19 I think. Sorry.</p> <p>20 Q Okay. And what did you study while you were in</p> <p>21 college?</p> <p>22 A Well, I was going to take the basics to end up with</p> <p>23 a counseling degree, but I ran out of money and had to</p> <p>24 come home with a tail between my legs. Sorry.</p> <p>25 Q I don't think there's anything to be -- have the</p>

12 (Pages 45 to 48)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Page 49	Page 50
<p>1 tail between your legs about that, nothing to be ashamed</p> <p>2 of there. That's just life.</p> <p>3 Do you have any other degrees?</p> <p>4 A I have a technical degree from Columbia Basin</p> <p>5 College that got me the job -- Well, I got the job working</p> <p>6 out in Hanford, and through one of their programs they</p> <p>7 paid for my schooling at CBC to become an AP Health</p> <p>8 Physics.</p> <p>9 Q That's great. And can you explain to me what that</p> <p>10 position is that you were talking about working in there?</p> <p>11 A Monitoring radiation, make sure that people don't</p> <p>12 overexpose themselves and contamination doesn't leave the</p> <p>13 area. Survey people, make sure they're clean, not</p> <p>14 contaminated. Make sure the step-off end where they're</p> <p>15 coming out of the radiological zone stays clean so that</p> <p>16 contamination doesn't migrate out of there.</p> <p>17 I'd also go into areas where the facilities were</p> <p>18 closed down because of Chernobyl. The ramifications of</p> <p>19 that accident shut a lot of the Hanford nuclear plants</p> <p>20 down, and they hadn't been entered for years. And so I'd</p> <p>21 go in there and survey -- with masks and everything,</p> <p>22 survey it, make sure that what levels of protective</p> <p>23 clothing to wear and whether respirators should be worn,</p> <p>24 how long they can stay there, depending on the level of</p> <p>25 radiation and that kind of thing.</p>	<p>1 And I'd write a survey. That survey would go on to</p> <p>2 be implemented and to state times and protective clothing</p> <p>3 to wear in that area.</p> <p>4 Q And how long did you work in that industry?</p> <p>5 A Oh, gosh. Well, my boy was born in 1990. That's</p> <p>6 when I started working at the -- what was called WPPSS</p> <p>7 back then, Energy Northwest these days. In 1990 started</p> <p>8 as a laborer, went to school, and then went out to the</p> <p>9 Hanford area.</p> <p>10 '95, I think. I'm not sure of the date, the year.</p> <p>11 But then I worked there until I retired in 2011, I think.</p> <p>12 Q And so are you currently employed?</p> <p>13 A I'm self-employed. I'm a financial advisor.</p> <p>14 Q Okay. And is that in a business that you own, or</p> <p>15 sort of what organization are you a financial advisor</p> <p>16 with?</p> <p>17 A Okay. I'm a financial advisor with Johnson Prentis</p> <p>18 Investments, or an -- I forget exactly what the tier is,</p> <p>19 but we are under the umbrella, I guess so to speak, of</p> <p>20 Royal Alliance.</p> <p>21 Q Okay. And when did you start that job?</p> <p>22 A Well, this with Royal Alliance, I switched over from</p> <p>23 LpL. Actually, I'm going to graduate here next week, so</p> <p>24 90 -- 90 days ago.</p> <p>25 Q Okay. Congratulations!</p>
Page 51	Page 52
<p>1 A Thank you.</p> <p>2 Q Between sort of leaving and retiring from your</p> <p>3 previous job -- and forgive me, with the nuclear industry</p> <p>4 and the radioactive industry and things like that, in 2011</p> <p>5 and when you started this job, what did you do in between</p> <p>6 there?</p> <p>7 A Well, I was unemployed for about six months. And I</p> <p>8 shouldn't say unemployed -- retired for about six months.</p> <p>9 And so my wife would come home expecting me to have dinner</p> <p>10 and the dishes washed and clothing, so I thought no, I</p> <p>11 need to go back and work on something.</p> <p>12 So to become productive and stay awake and stay</p> <p>13 alert I started working as a financial advisor. Back then</p> <p>14 it was RBC, Royal Bank of Canada. And then two years</p> <p>15 later, two or three years later I went to work with</p> <p>16 Waddell &amp; Reed. Waddell &amp; Reed got bought out by LpL. I</p> <p>17 don't -- didn't like the LpL system, so I moved over with</p> <p>18 a partner that I've known for years.</p> <p>19 Q Okay. So you mentioned earlier one group that</p> <p>20 you're pretty active in. Are there any other community</p> <p>21 groups or societies that you are a part of?</p> <p>22 A No, other than, of course, my church. No. No, not</p> <p>23 outside of that.</p> <p>24 Q Okay. Have you ever worked for any political</p> <p>25 campaigns?</p>	<p>1 A I don't know if you call it worked. I did volunteer</p> <p>2 work for a phone bank years ago.</p> <p>3 Q Okay. And what campaign was that for?</p> <p>4 A I think I called for -- Again, this is years ago</p> <p>5 that I did this. I want to say Doc Hastings, and the</p> <p>6 candidate's name was Honeycutt, I think. Not Honeycutt --</p> <p>7 Was Honeycutt one of the representatives? He didn't get</p> <p>8 elected, but I helped in his campaign.</p> <p>9 I can't remember what his name was. I'm sorry. I</p> <p>10 want to say Honeycutt, but that sounds like an official</p> <p>11 that was elected, and it wasn't him. It was -- Oh, I</p> <p>12 can't remember what his name was. I'm sorry.</p> <p>13 Q Do you recall was that Rod Honeycutt?</p> <p>14 A Was he elected?</p> <p>15 Q He was running for Congress. I know that much. I'm</p> <p>16 actually not sure whether or not he was elected.</p> <p>17 A If he didn't get elected, I'm sorry, but he's the</p> <p>18 one that I did phone calls for.</p> <p>19 Q Okay.</p> <p>20 A I just remember --</p> <p>21 Q Do you recall the office that the individual was</p> <p>22 running for?</p> <p>23 A Oh, gosh, no. I do remember -- and it probably</p> <p>24 wasn't necessarily local because I remember the bus was</p> <p>25 coming in from Spokane, ended up here in Tri-Cities pretty</p>

Page 53

1 late, like 11:00 or 12:00. And so we were out there in  
 2 the dark at the Safeway parking lot just rah-rahing.  
 3 Q Okay. And you mentioned Doc Hastings. What was he  
 4 running for?  
 5 A Oh, the position he's always had, or -- Yeah.  
 6 Newhouse took his place, so I was campaigning for -- on  
 7 the phone bank calling, using the phone, supporting.  
 8 Q Okay. And other than those two that you've  
 9 mentioned, have you ever volunteered for any other  
 10 political campaigns, either national or state or local?  
 11 A No, although I do remember having posters, and I  
 12 might have helped in the phone bank for President Bush,  
 13 the second one.  
 14 Q Okay. I think we covered this earlier, but just to  
 15 be sure. Have you ever run for any elected office?  
 16 A No.  
 17 Q And have you ever spoken with Jim Honeyford about  
 18 running for elected office?  
 19 A No, not that I remember. I mean yeah, no.  
 20 Q Okay. So you mentioned earlier that you live in  
 21 Kennewick; correct?  
 22 A Correct.  
 23 Q How long have you lived in Kennewick?  
 24 A Oh, gosh. A year, two years.  
 25 Q Okay. And how long have you lived in Benton County

Page 55

1 thinking southeastern.  
 2 Southcentral I guess would probably be -- I guess I  
 3 hadn't thought about it. I've never really thought about  
 4 Southcentral. I always thought Eastern Washington and  
 5 Western Washington, and we're in the Southeast.  
 6 So I guess Southcentral might have been Ellensburg,  
 7 I guess.  
 8 Q Okay. So just so we're on the same page, for the  
 9 purposes of this deposition when I use the term  
 10 Southcentral Washington I mean it to encompass the Yakima  
 11 Valley and Pasco region, as well as Benton, Adams and  
 12 Grant Counties, as well as Franklin in the mix as well.  
 13 So do you understand that term now?  
 14 A Oh, definitely. So what's Southeastern?  
 15 Walla Walla I guess is over there.  
 16 Q You know, I can't know for sure.  
 17 A I'm sorry.  
 18 Q All I know is what I've got here and sort of the  
 19 terms we're going to use. I'm sure there's a million  
 20 different ways we could break down Washington and define  
 21 it out, --  
 22 A Yeah.  
 23 Q -- but as long as we're on the same page.  
 24 A Yeah, I'm in Southcentral, I guess.  
 25 Q Okay. So what do you know about the demographics of

Page 54

1 in general?  
 2 A Oh, gosh. I can't remember when I moved from Pasco  
 3 to Kennewick the first time. I want to say Benton County,  
 4 Benton, Franklin, Tri-Cities -- there's three of them  
 5 here, three cities; and Franklin I think is on the other  
 6 side of the river.  
 7 Don't quote me on this. I'm not sure. Maybe ten  
 8 years.  
 9 Q Okay. Have you lived in any other counties in  
 10 Southcentral Washington?  
 11 A I mean, my life or -- I mean, I was raised in  
 12 Yakima, so I lived in Yakima County.  
 13 Years ago when I was still single I was in  
 14 Moses Lake for a while. I think that might be Grant  
 15 County. I think that's -- Oh, no, Brewster. I was in  
 16 Brewster for about a year or two. I have no idea what  
 17 county Brewster is, so --  
 18 Gee, I can't remember. I'm sorry. I'm 65. I've  
 19 lived in a few places.  
 20 Q There is no need to apologize.  
 21 Okay. So I just want to sort of put a definition  
 22 out there just for purposes of these questions. I'm going  
 23 to be asking about the region, and so what do you  
 24 understand me to mean when I say Southcentral Washington?  
 25 A I haven't really thought about it. I was kind of

Page 56

1 Southcentral Washington?  
 2 A Well, in general if I understand it correctly, we're  
 3 over 50 percent of the population, we being the  
 4 Latino/Hispanic community.  
 5 Q Okay. And do you know over 50 percent, is that the  
 6 closest approximation that you know?  
 7 A Yeah. I don't -- I don't know. I would say  
 8 average. I'm not -- I'm sure Sunnyside is -- Oh, gosh.  
 9 It's a higher percentage.  
 10 Pasco is I want to say 60, I think. I don't  
 11 remember, but --  
 12 Q Okay.  
 13 A You know, I'm guessing it's over 50 percent, I would  
 14 think. I'm assuming. I don't know.  
 15 Q So I'm going to go through a pretty long list of  
 16 cities and counties and ask you what you know about the  
 17 demographics of each, and so let's get into that.  
 18 So do you know how much of the population in Yakima  
 19 County is Latino?  
 20 A No. Again, I would probably think maybe 40. I  
 21 would think. I think it's lower in Yakima proper area. I  
 22 would think -- I'm assuming.  
 23 MR. HUGHES: Simone, my apologies for  
 24 jumping in here, but could I just get a standing objection  
 25 for this line of questioning, lack of foundation?

Page 57

1 MS. LEEPER: Got it.  
 2 MR. HUGHES: Thanks so much.  
 3 Q (By Ms. Leeper) Do you know how much of the  
 4 population in Pasco is Latino?  
 5 A I want to say again in Pasco maybe 60 percent. I'm  
 6 not sure. I know it's pretty high. Sixty percent would  
 7 be my guess.  
 8 Q How about the City of Yakima?  
 9 A I want to say I think it's -- I don't think it's  
 10 that high, but I want to say it's 40 percent, maybe --  
 11 maybe.  
 12 Q How about Toppenish?  
 13 A These are all guesses; right?  
 14 Q Yeah. I guess my question is whether you know. So  
 15 if you don't know the answer, you can tell me that as  
 16 well; but if you have a sense of it, you can also tell me,  
 17 "My sense is," and, you know, I'll know that you're not  
 18 basing it on the census.  
 19 A Okay. Let's start with that. I don't know, but I  
 20 have a sense what it would be on these cities.  
 21 Q Okay. And when you say you have a sense of it, what  
 22 are you basing that on?  
 23 A Well, the fact that I live here -- there. I mean,  
 24 yeah.  
 25 Q Okay. So do you know how much of the population in

Page 59

1 Franklin. What's your understanding of how much of the  
 2 population in Franklin is Latino?  
 3 A I don't know, but we're talking that being such an  
 4 agricultural side of the land here, it might be over 60.  
 5 I mean, I'm thinking Othello and that whole area there,  
 6 it's probably pretty high.  
 7 Q All right. We've got two more.  
 8 What do you know about the Latino population in  
 9 Adams County?  
 10 A Oh, okay. Where is Adams County? I don't remember.  
 11 I don't know.  
 12 Q If you don't know and you don't have any sense of  
 13 it, that's okay.  
 14 Okay. And then finally, what about Grant County?  
 15 A Grant County is Moses Lake; is that correct? I  
 16 don't know.  
 17 Q Okay.  
 18 A I'm guessing now where it is.  
 19 I'm pretty aware again of Franklin because I lived  
 20 in Pasco, and Benton because I lived here in Benton  
 21 County. And, of course, Yakima because I have family  
 22 there and grew up there and everything else; but outside  
 23 of that, the boundaries I'm not too sure of.  
 24 Q Okay. Do you know how much of the voting age  
 25 population in Southcentral Washington is Latino?

Page 58

1 Toppenish is Latino?  
 2 A It's probably I would think around 50 percent or  
 3 less maybe, maybe more. I grew up there, but, you know,  
 4 I'm not aware of it. Again, I'm guessing.  
 5 Q How about Mabton?  
 6 A Mabton might be pretty high. I'm thinking -- and  
 7 again, I don't know; but if I were to guess, I would say  
 8 60.  
 9 Q Okay. How about Sunnyside?  
 10 A Sunnyside I understand is pretty high. Again, from  
 11 my meetings with the community there, the sister city and  
 12 meeting people there and stuff. It might be as high as 70  
 13 I would think.  
 14 Q What about Wapato?  
 15 A It should be probably pretty high. Again, I would  
 16 think 60 percent or higher, and then Wapato -- and  
 17 Toppenish, actually being on the Reservation or near the  
 18 Reservation, that might be higher as far as the non-white  
 19 population.  
 20 Q What about the Latino population of Benton County?  
 21 A Oh, as a whole? Gosh. I don't think it's as high  
 22 as Franklin, so I would think 40 or 50 percent. Again, I  
 23 don't know, but I'm kind of guessing because there's a lot  
 24 of us here, a lot of Latinos, Hispanics.  
 25 Q So you mentioned Benton not quite as high as

Page 60

1 A No.  
 2 Q And how about the citizen voting age population?  
 3 A No, I wouldn't venture to guess.  
 4 Q Are you aware of whether the demographics in  
 5 Southcentral Washington have shifted in the last decade?  
 6 MR. STOKESBARY: Objection.  
 7 A Well, I think --  
 8 THE WITNESS: Okay. Sorry.  
 9 Q (By Ms. Leeper) You can go ahead and answer.  
 10 A It's shifted to the -- There would be more Latinos,  
 11 Hispanics, Mexicans, however you want to phrase it, yeah.  
 12 Q And what is your basis for that understanding that  
 13 there's an increasing Latino population?  
 14 A Oh, gee. The fact that I live here and the  
 15 businesses that have sprung up, and I'm assuming probably  
 16 articles I've read.  
 17 You know, it's pretty prevalent, the fact that we've  
 18 grown. Everything from people coming in from California,  
 19 and of course the migrant workers here. I mean, we've got  
 20 the apples and all the field work and, you know, farm  
 21 labor required. It's a given.  
 22 Q So I think you just touched on this, but I do want  
 23 to ask it directly. Do you have a sense of what has led  
 24 to the increase in Latino population?  
 25 A Well, the labor work, employment that's necessary.

Page 61

1 And, of course, California being so expensive, I'm aware  
 2 of at least two people that have sold their properties in  
 3 California -- Latinos, Hispanic, that sold their  
 4 properties in California and moved over here.  
 5 Q Okay. Do you agree that members of the Latino  
 6 community have historically experienced discrimination in  
 7 Southcentral Washington?  
 8 MR. STOKESBARY: Objection as to form.  
 9 Q (By Ms. Leeper) You can answer.  
 10 A Okay. I don't know if you necessarily want to call  
 11 it discrimination. I mean, as far as how are you trying  
 12 to -- What would be an example, I mean?  
 13 Q I guess I'll ask you how would you define  
 14 discrimination?  
 15 A Being denied something based on race. If we're  
 16 looking at race discrimination, you know, Hispanics or  
 17 whatever.  
 18 Q So with your understanding of the meaning of  
 19 discrimination, do you agree that members of the Latino  
 20 community have historically faced discrimination in  
 21 Southcentral Washington?  
 22 MR. STOKESBARY: Objection as to form.  
 23 Q (By Ms. Leeper) You can answer.  
 24 A I don't -- I don't think so.  
 25 My experience as far as discrimination goes in the

Page 63

1 At work I don't think I was ever denied a position  
 2 necessarily because of my race or anything like that. So  
 3 I don't -- I don't see anything like that. I don't know.  
 4 Q Okay. Just a few more questions. One is so you  
 5 mentioned sort of just, you know, I guess bullying based  
 6 on sort of race-based stuff at school.  
 7 Did you experience teachers intervening to stop  
 8 that?  
 9 A Oh, jeez. I don't remember. I don't -- I don't  
 10 remember.  
 11 Q Okay. And you mentioned your farm owner bosses. In  
 12 what capacity have you done that work?  
 13 A I was a ranch hand, tractor driver, drive truck, you  
 14 know, change the water lines in the morning before school,  
 15 water lines after school. You know, hoed the beets and  
 16 thinned the mint and just the regular farmwork for the  
 17 farmer.  
 18 Q Okay. And what age sort of did you do that kind of  
 19 work?  
 20 A Oh, gee. Probably since I was -- the day I was  
 21 born, except -- of course, I was born in '56.  
 22 I would say probably -- oh, gee, I remember Dad  
 23 coming picking us up after school in 6th, 7th grade to go  
 24 do hoe beets in the afternoon. And then, of course,  
 25 through high school I'd again go change water lines for

Page 62

1 workforce here is I don't think it exists in the sense  
 2 that we're not -- You know, we're not going to give you  
 3 this job based on your race. Most of the time it was  
 4 pretty acceptable.  
 5 Q Would you define prejudice differently than you  
 6 would define discrimination?  
 7 A I don't know necessarily prejudice. I think  
 8 profiling is a different -- would be a different word, and  
 9 I do that myself. I mean, you know, just profile people  
 10 based on the fact that, you know, they're Mexican and, you  
 11 know, most likely Catholic. I mean, you know, that kind  
 12 of -- I don't know if you want to call it prejudice, but  
 13 yeah.  
 14 Q What kind of profiling do you think that the Latino  
 15 community in Southcentral Washington has faced?  
 16 A Just that, that kind of -- Again, my experience in  
 17 working in the farms, the farmers were great to us. You  
 18 know, the non -- the white farmers. You know, I've got no  
 19 complaints. I loved my -- my farmer bosses.  
 20 And school, I think the biggest thing that I can  
 21 remember from high school as far as discrimination, if you  
 22 want to call it, was the fact that I would take my  
 23 homemade these days they're called ricos -- we called them  
 24 tacos -- you know, to school, and they'd make fun of us --  
 25 you know, at school, kid stuff.

Page 64

1 the farmers in the mornings, and then after school I  
 2 worked -- I worked for them. I was their ranch hand.  
 3 Q Okay. And have you ever personally experienced any  
 4 instances besides the one we sort of discussed at school  
 5 of, I guess, sort of negative stereotyping or making fun,  
 6 either in person or online, based on the fact that you are  
 7 Mexican?  
 8 A No. No, not from -- I mean, we kid ourselves, you  
 9 know, but -- Yeah, no. Other than that, no, not from  
 10 other people that were non-Latinos.  
 11 Q Okay. Do you have any knowledge about the voting  
 12 patterns of Latino voters in the state of Washington?  
 13 A No.  
 14 Q Do you have any knowledge about the voting patterns  
 15 of Latino voters specifically in Southcentral Washington?  
 16 A No.  
 17 Q Do you have any knowledge about the voting patterns  
 18 of white voters in Southcentral Washington?  
 19 A Well, I'm kind of assuming because of the fact that  
 20 Republicans, you know, tend to win here that that would be  
 21 the pattern. I guess on the reverse, the other side --  
 22 and I don't know the percentage of Latino/Hispanic voters,  
 23 but I think that might make a difference. I mean, I don't  
 24 know.  
 25 Q Okay. So just to be clear, what you're saying is

Page 65

1 that based on the results of the elections you see where  
 2 Republicans tend to win and the white voters make up a  
 3 majority, you are assuming that then the white voters are  
 4 voting for Republicans; is that correct?  
 5 A That's kind of the assumption, that Latinos are not  
 6 necessarily voting. And again, I don't know their  
 7 patterns, but the assumption is Latinos mostly vote  
 8 Democrat and so, you know, that's what I would think.  
 9 Q Okay. And you say the assumption is. Where have  
 10 you heard that assumption, or where are you getting that  
 11 assumption from?  
 12 A Oh, when I was involved in the -- There's an  
 13 organization that just popped up. I used to be a member  
 14 of the -- oh, gosh, what is it? It's an acronym.  
 15 National Hispanic Republican Conference or Mission, or  
 16 something like that. And we would have --  
 17 We would have booths. We would have booths at the  
 18 park, the baseball park and stuff like that. And it was  
 19 pretty noticeable that Latinos were not Democrats,  
 20 everything from saying the party of the rich and that kind  
 21 of thing. I mean, personal I guess you would call it  
 22 experience, or whatever.  
 23 Q Okay. So I think my question was a little bit  
 24 different than what you answered there. So that's sort of  
 25 your experience of meeting Latinos who might be

Page 67

1 voting patterns broken down by race for Washington state  
 2 legislative races specifically in Southcentral Washington?  
 3 A No.  
 4 Q Have you reviewed or conducted any statistical  
 5 analysis to determine the breakdown of votes by race for  
 6 seats in the state legislature?  
 7 A No.  
 8 Q Have you studied any opinion polls focused on Latino  
 9 voters in Southcentral Washington?  
 10 A No.  
 11 Q How about the state of Washington more broadly?  
 12 A No.  
 13 Q Do you know what the term racially polarized voting  
 14 means?  
 15 A No, but --  
 16 MR. STOKESBARY: Objection.  
 17 A Okay.  
 18 Q (By Ms. Leeper) You can go ahead and answer.  
 19 A Yeah, I don't. I'm kind of guessing because of the  
 20 term, but -- you know, polarizing the races. I mean, I  
 21 don't know.  
 22 Q Okay. And do you have any knowledge about whether  
 23 Latino voters and white voters prefer the same candidates  
 24 or different candidates for state legislative races in  
 25 Southcentral Washington?

Page 66

1 Republican.  
 2 My question is about this overarching assumption  
 3 that you've referred to that Latinos tend to vote  
 4 Democrat, and so I guess my question is where are you  
 5 getting that assumption from?  
 6 A Oh, just regular TV media. And, of course, at those  
 7 booths the interest or the -- I guess the non-interest in  
 8 the comments from passersby, my own experience, the fact  
 9 that for some reason it's assumed that the Republican is a  
 10 party of the rich, so to speak.  
 11 Q And so in conversations with Latinos at that booth  
 12 they were saying that they thought that the Republican  
 13 party was a party of the rich.  
 14 Is that what you're saying?  
 15 A Yeah, pretty much. I mean, yeah, just the fact that  
 16 passers go -- and again, I don't know if they were  
 17 Democrat or not, just their assumption that, you know,  
 18 they have of the Republican party is probably the same  
 19 assumption that I have of the Democratic party, so --  
 20 Q Okay. Thank you for that clarification.  
 21 Have you ever reviewed any election returns with  
 22 voting patterns broken down by race for Washington state  
 23 legislative races?  
 24 A No.  
 25 Q Have you ever reviewed any election returns with

Page 68

1 A Okay. Repeat -- I mean, repeat the question. Kind  
 2 of like --  
 3 Q It's a long one. I'll go through it again one more  
 4 time.  
 5 Do you have any knowledge about whether Latino  
 6 voters and white voters prefer the same candidates or  
 7 different candidates for state legislative races in  
 8 Southcentral Washington?  
 9 A Again, I don't know. I don't quite understand the  
 10 question. Can you ask me like if you're asking me the  
 11 question? I'm sorry.  
 12 Q Absolutely. No worries. I'll just go ahead and  
 13 rephrase. It's a long one. There were a lot of  
 14 prepositional phrases there.  
 15 So I guess I'm basically asking specifically whether  
 16 you have any knowledge specifically about the preferences  
 17 of white and Latino voters when they're voting for state  
 18 legislative races in Southcentral Washington.  
 19 A Yeah, no, I don't have any knowledge of that. I  
 20 think I want to understand the question, that if I'm  
 21 voting for a candidate, --  
 22 Q Um-hmm.  
 23 A -- whether I care if he's white or not. Is that --  
 24 Q Oh, not quite. So I think I'm not --  
 25 I'm asking specifically about like as a group

Ismael G. Campos

October 13, 2022

Page 69	Page 70
<p>1 whether white voters and the group Latino voters tend to</p> <p>2 in these state legislative races in Southcentral</p> <p>3 Washington vote for the same candidates or different</p> <p>4 candidates.</p> <p>5 A No, I don't have any knowledge of it, but I would</p> <p>6 assume that if there is a Hispanic who is having to vote</p> <p>7 between a Hispanic conservative and a white conservative,</p> <p>8 I'm kind of assuming because of the familiarity would vote</p> <p>9 for a Hispanic.</p> <p>10 Q Can you tell me a little bit more? Do you mean by</p> <p>11 the familiarity that a Hispanic voter might feel with a</p> <p>12 Hispanic candidate?</p> <p>13 A Oh, in the sense of the cultural, I would assume the</p> <p>14 relationship that a -- if I'm Mexican and he's Mexican and</p> <p>15 he's conservative, then there would be more connection, so</p> <p>16 to speak.</p> <p>17 You know, again, depending on the policies that the</p> <p>18 guy is campaigning on, all given the same, I would assume</p> <p>19 he'd probably vote Latino. I mean, I'm just kind of</p> <p>20 generalizing that.</p> <p>21 Q Okay. Thank you.</p> <p>22 So could you tell me what you know about the process</p> <p>23 of redistricting in general?</p> <p>24 A Oh, gosh. In general, every ten years they do the</p> <p>25 census, and depending on how much of the population</p>	<p>1 changed in a particular area, they might redistrict.</p> <p>2 That's basically about the extent of it all.</p> <p>3 Q Okay. And what do you know about the process of</p> <p>4 redistricting state legislative districts in the state of</p> <p>5 Washington?</p> <p>6 A The same thing, I would assume. If there's</p> <p>7 population changes, there might be movement of the</p> <p>8 district.</p> <p>9 Q Okay. And do you have any additional information</p> <p>10 that you know about the process of how that redistricting</p> <p>11 occurs?</p> <p>12 A No. I haven't really delved into that. I suppose I</p> <p>13 should have asked Paul, but never did.</p> <p>14 Q Mel, what do you know about the Federal Voting</p> <p>15 Rights Act?</p> <p>16 A Oh, gosh. Without a refresher I have no --</p> <p>17 MR. STOKESBARY: Objection as to form.</p> <p>18 Sorry, Mel. Objection as to form.</p> <p>19 Q (By Ms. Leeper) And you can go ahead and answer.</p> <p>20 A Yeah, without a refresher in what is it, civic law</p> <p>21 or whatever it's called, I don't -- I don't remember.</p> <p>22 Q Okay. You mentioned earlier that you currently live</p> <p>23 in Legislative District 8; is that right?</p> <p>24 A Correct.</p> <p>25 Q Do you feel any particular connection to Legislative</p>
Page 71	Page 72
<p>1 District 8?</p> <p>2 A Any particular what connection?</p> <p>3 Q Connection to that, the community of Legislative</p> <p>4 District 8.</p> <p>5 A No, other than the fact that with Senator Sharon we</p> <p>6 were pretty well acquainted with.</p> <p>7 In Benton County -- and I don't know if it's the</p> <p>8 same district, or -- Jerome Delvin was a good, you know,</p> <p>9 fairly good friend because of our intercommunity meetings</p> <p>10 and stuff.</p> <p>11 Oh, gosh. Years ago Shirley Hankins was pretty</p> <p>12 popular with us, and I want to say that was when I lived</p> <p>13 in Pasco, in Franklin County. Oh, gosh. That -- You</p> <p>14 know, other than that, the fact that I lived in those</p> <p>15 cities and towns, no particular connection.</p> <p>16 Q Okay. And you mentioned three, I think, different</p> <p>17 elected officials. Are any of those people still in</p> <p>18 office? And I can go through them one by one.</p> <p>19 A Well, Shirley --</p> <p>20 Q I think --</p> <p>21 A Yeah, Shirley Hankins isn't --</p> <p>22 Q -- I got their names.</p> <p>23 A -- isn't there anymore from what I -- Excuse me, but</p> <p>24 I don't even know if she's alive. She's pretty old.</p> <p>25 Jerome Delvin is -- I want to say is now a</p>	<p>1 commissioner, I think.</p> <p>2 Of course, I don't know if Sharon Brown is still</p> <p>3 there or not. We haven't talked to her in quite a while.</p> <p>4 She might still be a senator.</p> <p>5 Yeah. Who else did I mention?</p> <p>6 Q You also mentioned Sharon.</p> <p>7 A Yeah, Sharon Brown. Yeah. Yeah, I don't --</p> <p>8 Q I think --</p> <p>9 A -- know if she's -- Go ahead.</p> <p>10 Q No, please go ahead. I apologize.</p> <p>11 A Yeah, I don't know if she's running or is still a</p> <p>12 senator. I know she was thinking of running for judge,</p> <p>13 and she might have run for judge. I don't know if she got</p> <p>14 the judge position and was elected or if she is still a</p> <p>15 senator. I haven't kept up.</p> <p>16 Q What interest do you have in the boundaries of the</p> <p>17 current Legislative District 15?</p> <p>18 A Well, other than the fact that they might be</p> <p>19 racially redrawn, but the district is not that important.</p> <p>20 I mean, so long as it's fair and equitable, I mean.</p> <p>21 Q Okay. And I'm going to ask it again and ask about</p> <p>22 sort of your personal interest. So do you have any</p> <p>23 personal interest in boundaries of Legislative District</p> <p>24 15?</p> <p>25 A No, not personal, other than when I was thinking of</p>

18 (Pages 69 to 72)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Page 73	Page 74
<p>1 running; but other than that, yeah, no.</p> <p>2 Q Okay. As far as you know, is the current</p> <p>3 Legislative District 15 majority Latino by citizen voting</p> <p>4 age population?</p> <p>5 A Oh, I don't know. The -- Okay. The current one or</p> <p>6 the redrawn one? I guess actually I don't know of either,</p> <p>7 so --</p> <p>8 Q So I do want to be -- I'll just be clear in this</p> <p>9 point. When we talk about Legislative District 15 and the</p> <p>10 current version, I'm referring to the version that was</p> <p>11 approved by the legislature at the beginning of this year,</p> <p>12 2022, so just so you know how to understand that term.</p> <p>13 A (Nodded.)</p> <p>14 Q And so what is your understanding of the current</p> <p>15 partisan leaning of the Legislative District 15 that was</p> <p>16 approved at the beginning of 2022?</p> <p>17 A My understanding of this new district, of why I'm</p> <p>18 involved in this is that it was redrawn based on racial</p> <p>19 population, Latino, and so that's the extent of it.</p> <p>20 Q Okay. And do you have any understanding of the</p> <p>21 partisan lean of that district?</p> <p>22 A Well, that would be -- I mean, if I'm -- If I</p> <p>23 understand the question, it is now, supposedly because</p> <p>24 it's a majority Latino, would be leaning Democrat.</p> <p>25 Q Okay. Did you ever testify at any of the public</p>	<p>1 hearings that were held by the 2021 Washington</p> <p>2 Redistricting Commission?</p> <p>3 A No, I've never testified in anything.</p> <p>4 Q Did you ever submit any written testimony to the</p> <p>5 2021 Washington Redistricting Commission?</p> <p>6 A No.</p> <p>7 Q Why not? Why did you not submit either kind of</p> <p>8 testimony?</p> <p>9 A I really didn't have a part of this. And again,</p> <p>10 because as an intervenor, you know, I can do this.</p> <p>11 Q Were you aware that there were public hearings being</p> <p>12 held by the 2021 Washington Redistricting Commission?</p> <p>13 A Not that I'm aware of, no. There might have been a</p> <p>14 media reporting or something, but I didn't pay attention</p> <p>15 to that. I don't know.</p> <p>16 Q Okay. I'll go back one different way to see if we</p> <p>17 can get to it, so --</p> <p>18 A Okay.</p> <p>19 Q -- we'll give it a fresh try here. Does that work</p> <p>20 for you?</p> <p>21 A Sure. Go ahead.</p> <p>22 Q Okay. Putting aside the race of the candidates that</p> <p>23 are running, as far as you know do white voters as a group</p> <p>24 tend to vote for and prefer the same candidates as Latino</p> <p>25 voters as a group?</p>
Page 75	Page 76
<p>1 A Within their own party or, you know, policies, or</p> <p>2 however you phrase it, values.</p> <p>3 Q Yeah, so thanks for setting aside the party issue.</p> <p>4 We're really focusing on the group that matters that we're</p> <p>5 talking about is white voters and Latino voters, and we're</p> <p>6 talking across parties, just in general. When they sit</p> <p>7 down in a general election and vote, you know, in the</p> <p>8 ballot box.</p> <p>9 So again, putting aside the race of the candidates,</p> <p>10 as far as you know do white voters tend to prefer the same</p> <p>11 candidates or different candidates than Latino voters as a</p> <p>12 group do?</p> <p>13 A Again, I think I would say depending on their --</p> <p>14 more or less their values, not necessarily their race.</p> <p>15 So, you know, would I vote for a Hispanic liberal?</p> <p>16 Probably not. It goes against my values. I would</p> <p>17 assume -- I would hope -- that most races, most people</p> <p>18 would vote their values and not necessarily the race. So</p> <p>19 I'm not aware of anybody that doesn't do that.</p> <p>20 MS. LEEPER: Okay. And I just -- Could we</p> <p>21 go off the record for a quick moment?</p> <p>22 (Discussion off the record.)</p> <p>23 (Zoom technical difficulty, connection lost by Court</p> <p>Reporter.)</p> <p>24</p> <p>25 (Break 11:30 a.m. to 11:34 a.m.)</p>	<p>1</p> <p>2 MS. LEEPER: Okay. Thank you. Let's go</p> <p>3 back on the record.</p> <p>4 Q (By Ms. Leeper) Okay. Mel, I want us to take a look</p> <p>5 at just a few documents in this case. So procedure-wise</p> <p>6 what I'm going to do is I'm going to drop it into the chat</p> <p>7 box so that all the attorneys that are here have a chance</p> <p>8 to look at it, but I'm also going to be screen sharing the</p> <p>9 document.</p> <p>10 So if you just want to go ahead and look at the</p> <p>11 screen, you should be able to see it just fine. So</p> <p>12 everyone should have that first one.</p> <p>13 A Do I click on it, or what -- what happens?</p> <p>14 (Document displayed.)</p> <p>15 Q Well, can you see that okay?</p> <p>16 A Okay. Yeah, I see it.</p> <p>17 Q Okay. Great. Then let's go ahead and do this. All</p> <p>18 right. So I'm going to go ahead and just scroll down to</p> <p>19 give you a chance to look at the document, and you can get</p> <p>20 a sense of it.</p> <p>21 And if you do want to open it in your own browser</p> <p>22 and scroll at your own time, you should feel free to do</p> <p>23 that as well.</p> <p>24 A My phone clicked in again, but I'm plugged in.</p> <p>25 Q Okay. Mr. Campos, have you had a chance to review</p>



Ismael G. Campos

October 13, 2022

Page 77	Page 78
1 that document?	1 documents or communications in your possession that might
2 A Yes. Is that --	2 be responsive to these requests?
3 Q And have you --	3 A Yes. This is where it's asking me for documents
4 A Is that --	4 from the Redistricting Commission and documents -- Yeah.
5 Q Have you --	5 Yeah, I did a search for that.
6 A Is that the one where -- I'm sorry. Is that the one	6 Q How did you conduct that search?
7 that's relating to this? Yeah, I see it.	7 A Memory.
8 Q Yeah. So I guess my question to you is have you	8 Q Did you use any search terms through -- to do that
9 seen this document before?	9 search?
10 A Yes. I'm thinking yes.	10 A No. Again, I'm not very tech savvy as far as
11 Q And what do you understand it to be?	11 computers go. So I just -- From memory, anybody from the
12 A The response to the lawsuit of this issue.	12 commission that might have sent me something. It would
13 Q Okay. So I'm going to represent to you that this	13 have been my brother Paul, and I go, "Hey, Paul" -- I
14 is, as you see in the caption here, Plaintiffs' First Set	14 think I called him or texted him -- and said, "Have you
15 of Requests for Production to the Intervenor Defendants.	15 ever sent me any documents? Because these people are
16 That's you.	16 requesting it."
17 When did you first see this document?	17 And he goes, "No, I have no documents. We never
18 A I don't remember.	18 sent anything like that."
19 Q Do you have an estimate?	19 Okay. And then when I was a part of that is when he
20 A Well, since -- I'm assuming this is part of the two	20 mentioned, "We probably shouldn't discuss this anymore if
21 documents or whatever that -- I think there's two of them.	21 you're a part of that." Okay.
22 It might be the same one. I don't know. The -- When	22 Q Okay. And did you search through any texts on your
23 they -- I became or selected to volunteer to be part of	23 phone to find any communications that might be relevant?
24 this lawsuit, that this was sent to me.	24 A Well, yeah. Yeah. With Jim, Paul. I think that's
25 Q Okay. Did you conduct any searches to find any	25 it. Other than that, there was no document or
Page 79	Page 80
1 communication, other than the request if I wanted to be a	1 went back as far as when any communications might have
2 part of this.	2 come up from this.
3 Q And you say you looked through your communications	3 Q But you didn't conduct any word searches; is that
4 with Jim and Paul. How did you look through your text	4 correct?
5 messages?	5 A No.
6 A Just scrolling.	6 Q Did your attorneys provide you with any search terms
7 Q Okay. And did you find any texts that you thought	7 that you should use to conduct this search?
8 might be relevant?	8 MR. STOKESBARY: I'm going to --
9 A No.	9 Q (By Ms. Leeper) And I'm not asking what those terms
10 Q How about your email, did you search through your	10 are. I'm just asking if they were provided.
11 email to find anything that might be relevant?	11 MR. STOKESBARY: I'm still going to object
12 A Yeah. Yeah. I mean, as far back as I could go, and	12 on the basis of attorney-client privilege and instruct you
13 up until whenever this issue came up, there was no --	13 not to answer that question, Mel.
14 there was nothing there.	14 Q (By Ms. Leeper) Okay. Did you end up producing any
15 Q Okay. And you say "whenever this issue came up."	15 documents or text messages to your counsel?
16 Did you search through when you became involved in	16 A No.
17 the lawsuit?	17 Q Okay. I'm going to exit out of this document.
18 A Well, I probably went further than that, just	18 A Okay.
19 because I -- Personal satisfaction. I want to say -- When	19 Q I'm going to send another one. I think what might
20 did this come up? And I want to say that I went back to	20 be easiest is if you can open the chat there, do you see
21 maybe -- oh, gosh, before January, February when we	21 where I sent it?
22 started talking about candidates with Jim and stuff like	22 A I didn't see anything. Something came up and went
23 that, and I didn't find anything.	23 away.
24 Q Did you go back as far as January of 2021?	24 Q Okay. So at the bottom of your screen do you see
25 A No. Well, I mean, maybe. I don't know. I just	25 where it says chat?

20 (Pages 77 to 80)

Soto Palmer, et al. v. Hobbs, et al.  
Lakeside Reporting (833) 365-3376

Page 81	<p>1 A Chat, um-hmm.</p> <p>2 Q Can you double click on that for me?</p> <p>3 A Okay.</p> <p>4 Q And do you see the document I just sent? It's</p> <p>5 titled 2022 09 12 Amended is what you can see.</p> <p>6 A All I see is whiteboard and iPhone pad.</p> <p>7 Q Oh, okay. Well, then let's keep going with the</p> <p>8 screen share. That might be actually the easiest thing.</p> <p>9 A So I get out of this, X out?</p> <p>10 Q Yeah. I think in one second when I click this, I</p> <p>11 think you should be able to see my screen now; is that</p> <p>12 correct?</p> <p>13 A Oh, yeah. There you are, yeah.</p> <p>14 Q Okay. Great. So I'm going to do the same thing</p> <p>15 where I scroll and let you see this document. And I'm</p> <p>16 going to scroll past the definitions and instructions to</p> <p>17 the relevant part at the bottom.</p> <p>18 Okay. Mel, have you seen this document before?</p> <p>19 A Probably. If this is part of the documents that was</p> <p>20 sent over for this, then yes.</p> <p>21 Q Okay. And do you know what this document is?</p> <p>22 A Third Request for Production to us. That's where</p> <p>23 you're probably asking me for the documents and stuff</p> <p>24 again.</p> <p>25 Q Okay. And did you conduct any searches to find</p>	Page 82	<p>1 documents that would be responsive to these requests?</p> <p>2 A No, I haven't found any documents for anything --</p> <p>3 anybody.</p> <p>4 Q When did you do the search that we were talking</p> <p>5 about earlier where you looked through your text messages</p> <p>6 and email?</p> <p>7 A When it was first requested of me. I don't remember</p> <p>8 the date. I'd have to go back to the emails.</p> <p>9 Q Okay. Do you have a ballpark estimate? Would you</p> <p>10 say that was in the first half of the year or after the</p> <p>11 summer?</p> <p>12 A Oh, gosh. It can't be too long ago. I want to say</p> <p>13 two or three months ago, maybe.</p> <p>14 Q Okay. I'm going to stop the share of this document.</p> <p>15 You mentioned that you had texted with your brother</p> <p>16 about whether or not you had any relevant communications</p> <p>17 or texts with him.</p> <p>18 Do you still have those text messages?</p> <p>19 A I don't know. Maybe. Probably. I don't think I've</p> <p>20 deleted anything of his. I can --</p> <p>21 Q Okay.</p> <p>22 A I'd have to go back and look to see if I do have it.</p> <p>23 Q Okay. And what texting platform do you use to text?</p> <p>24 Is that just your standard one on your phone, like</p> <p>25 iMessage?</p>
Page 83	<p>1 A Right.</p> <p>2 Q Do you ever use any other texting platforms like</p> <p>3 WhatsApp or Signal or maybe Facebook Messenger?</p> <p>4 A Yeah, no, I'm not very tech savvy.</p> <p>5 Q Okay.</p> <p>6 A Now, I shouldn't say I haven't used Messenger</p> <p>7 before, I mean, but certainly not with my brother. I just</p> <p>8 used that one.</p> <p>9 Q And have you ever used any form of communication</p> <p>10 other than your standard text application and email to</p> <p>11 talk with Jim Troyer?</p> <p>12 A No. I mean, it's always been a text.</p> <p>13 Q Have you --</p> <p>14 A I shouldn't say it's always been a text. You know,</p> <p>15 we called each other.</p> <p>16 Q Um-hmm. Have you deleted any emails that you've</p> <p>17 exchanged with your brother or with Jim Troyer, or anyone</p> <p>18 else related to redistricting?</p> <p>19 A Probably not. I mean, we didn't discuss any. Yeah,</p> <p>20 no, it's probably there. I mean, if there's anything</p> <p>21 there, yeah.</p> <p>22 Q Okay. And have you deleted any voice mails that</p> <p>23 you've received from anyone regarding redistricting?</p> <p>24 A No. Well, I shouldn't say no. I haven't -- I</p> <p>25 haven't received any emails to delete -- or voice mails.</p>	Page 84	<p>1 I just want to make sure that's there.</p> <p>2 Q Have you ever had any communications with Anton</p> <p>3 Grose?</p> <p>4 A I have no idea who that might be.</p> <p>5 Q How about Evan Ridley?</p> <p>6 A No.</p> <p>7 Q Okay. I'm going to turn to just a few more</p> <p>8 documents now.</p> <p>9 (Document displayed.)</p> <p>10 Q Can you see that?</p> <p>11 A Yes.</p> <p>12 Q All right. I'll scroll down, and I'm going to go</p> <p>13 down again to the questions.</p> <p>14 Okay. Have you had a chance to review the document?</p> <p>15 A Yeah. I mean, it looks familiar. I haven't</p> <p>16 reviewed it lately. I don't think this is -- Yeah.</p> <p>17 Q So my question related to that, have you seen this</p> <p>18 document before?</p> <p>19 A It looks very familiar, yeah. I think I remember</p> <p>20 those questions and answers.</p> <p>21 Q Do you remember providing any answers to the</p> <p>22 questions in this document?</p> <p>23 A I remember agreeing to the answers. I think that's</p> <p>24 the document, yeah.</p> <p>25 Q Okay. Mr. Campos, who is paying for your legal</p>

Page 85

1 representation in this case?  
 2 MR. STOKESBARY: Objection.  
 3 Q (By Ms. Leeper) You can answer.  
 4 A Okay. I don't know.  
 5 Q Has anyone told you who is paying for the attorneys  
 6 in this case?  
 7 A Not that I recall. If they did, I didn't pay  
 8 attention because it wasn't coming out of my pocket. So  
 9 yeah, I guess it doesn't -- Yeah, I don't know.  
 10 Q So to be clear, --  
 11 A To my knowledge, --  
 12 Q Excuse me. Sorry for talking over you for a moment.  
 13 So just to be clear, are you paying for your legal  
 14 representation in this case?  
 15 A No.  
 16 Q Okay. I'm going to bring up one more, maybe two  
 17 more documents.  
 18 (Document displayed.)  
 19 Q I'll give you a chance to look at this.  
 20 Mel, have you had a chance to review this?  
 21 A Yeah. Again, it's the requests for information; is  
 22 that right? I'm assuming.  
 23 Q Yes. Do you remember seeing this document before?  
 24 A Oh, I'm assuming it's in the documentation that I've  
 25 been receiving for this process.

Page 87

1 nothing to add, or something like that to these responses.  
 2 Q Okay. So I'm going to switch gears just for a quick  
 3 second and ask you, you've talked about communications  
 4 that you might have had over text or email with people,  
 5 including Jim Troyer, about running or considering running  
 6 in Legislative District 15; is that correct?  
 7 A Right.  
 8 Q And do you still have those emails about running or  
 9 potentially thinking about running in Legislative District  
 10 15?  
 11 A I don't necessarily know that there's emails. I  
 12 know that I talked with Jim about the possibility about  
 13 it. You know, I'd have to go back and look.  
 14 I was looking specifically for, you know, this issue  
 15 as far as my communications with Jim. I wasn't looking  
 16 for our normal requests for candidates and, you know,  
 17 whether I was going to run or not or that kind of thing,  
 18 reasons why I'm not running, stuff like that.  
 19 Q Okay. And you said you're not sure if there's  
 20 emails. Might there -- Do you know if there are text  
 21 messages about that discussion?  
 22 A Well, that's what I meant. I don't think I've ever  
 23 emailed Jim that I remember. I meant the text messages.  
 24 Q Okay. So you do have texts about that topic with  
 25 Jim?

Page 86

1 Q Do you remember when you first saw this document?  
 2 A Oh, no, I -- I -- No.  
 3 Q Did you provide any answers to the questions in this  
 4 document?  
 5 A I'm assuming it's the questions where do I concur or  
 6 agree with them, and yeah. I mean, I agreed.  
 7 Q Okay. I'm going to open one last document for you.  
 8 (Document displayed.)  
 9 MR. STOKESBARY: Hey, Simone, I just -- The  
 10 documents so far have been numbered one, two, three, five,  
 11 six. I'm just confirming that I didn't -- there wasn't a  
 12 four shared on the screen that I didn't notice I hadn't  
 13 downloaded.  
 14 MS. LEEPER: There is no four.  
 15 MR. STOKESBARY: Okay.  
 16 MS. LEEPER: It's going to live in my  
 17 computer forever.  
 18 MR. STOKESBARY: Okay. Sorry to interrupt.  
 19 MS. LEEPER: Thank you. And I'm not  
 20 marking these as exhibits, so just so you know.  
 21 MR. STOKESBARY: Okay. Thanks.  
 22 Q (By Ms. Leeper) Okay. Mr. Campos, Mel, have you had  
 23 an opportunity to review this document?  
 24 A Yeah, I'm assuming again it's part of the process,  
 25 and I think I remember responding either I agree or I have

Page 88

1 A No, I don't know that I do. I mean, what I'm saying  
 2 is I looked for emails because of again, that request for  
 3 whatever, a request for emails, you know, on this topic;  
 4 and so I didn't find anything that I remember.  
 5 And again, as far as the running for the position, I  
 6 didn't think that was relevant to this, so I, you know,  
 7 probably just scrolled right past.  
 8 Q Got it. Okay.  
 9 MS. LEEPER: Well, if we could go off the  
 10 record and take maybe a five-minute break, coming back at  
 11 12:05, does that work for everyone?  
 12 MR. STOKESBARY: Yeah, that's fine with me.  
 13 Mel, is that okay with you?  
 14 THE WITNESS: Yeah. Yeah, I'm okay.  
 15 MS. LEEPER: Okay. I'll see you all  
 16 shortly.  
 17 (Break 11:58 a.m. to 12:06 p.m.)  
 18 MS. LEEPER: Okay. I think we're ready to  
 19 go back on the record.  
 20 Q (By Ms. Leeper) Just a few more questions for you,  
 21 Mel, and then we --  
 22 A Okay.  
 23 Q -- will be wrapping up from my end of things.  
 24 I just wanted to be clear about precisely what kind  
 25 of a search you conducted for any responsive

Page 89	Page 90
<p>1 communications or documents for our requests.</p> <p>2 So breaking it down into pieces, you mentioned that</p> <p>3 for communications with your brother, Paul Campos, you had</p> <p>4 texted or called him to ask whether or not there were any</p> <p>5 relevant communications that you would have had; is that</p> <p>6 correct?</p> <p>7 A Yes.</p> <p>8 Q And he responded that there were not any relevant</p> <p>9 communications; is that right?</p> <p>10 A Yeah.</p> <p>11 Q Outside of that did you actually go through text</p> <p>12 messages with your brother to look for those</p> <p>13 communications?</p> <p>14 A Yeah. That's why I called him and asked him, "Hey,</p> <p>15 did we ever discuss this? Because I'm becoming part of</p> <p>16 this." And so I mean, I went through and searched, didn't</p> <p>17 find anything; but just to make sure I'm covering it</p> <p>18 because it seemed pretty important, so I said, "Hey, Paul,</p> <p>19 did we ever discuss this, or did you send me any paperwork</p> <p>20 concerning this?" And he goes pretty much, "No, I don't</p> <p>21 discuss, you know, the interworkings of my position," or</p> <p>22 something along that line, but no. "And if you're going</p> <p>23 to be a part of this, best that we not discuss that any</p> <p>24 further." And I'm like, "Okay."</p> <p>25 Q Okay. And when you say you searched through the</p>	<p>1 text messages, was that just your scroll search?</p> <p>2 A Right. Yeah, as far back as I could go.</p> <p>3 Q And you had said that you did not think that that</p> <p>4 scroll search went back through, you know, the beginning</p> <p>5 of 2021; correct?</p> <p>6 A No, it was since I got involved with this. Maybe</p> <p>7 before when -- Again, like with Jim, just to make sure</p> <p>8 that, you know, I didn't know then this thing started, so</p> <p>9 just go back further and make sure I'm covered for this</p> <p>10 timeframe.</p> <p>11 Q Okay. And you --</p> <p>12 A That goes back to --</p> <p>13 Q And talking about Jim, did you do the same scroll</p> <p>14 search for your texts with Jim Troyer?</p> <p>15 A Yeah.</p> <p>16 Q And that was also going back to the beginning of</p> <p>17 your involvement in this matter; is that correct?</p> <p>18 A Yeah, probably even before just to, you know, my own</p> <p>19 comfort level.</p> <p>20 Q But not all the way back to January of 2021?</p> <p>21 A I didn't think it was necessary, but yeah. As far</p> <p>22 as I know, I didn't. There's not that many text messages.</p> <p>23 It's not like we text messaged, you know, once a month or</p> <p>24 whatever.</p> <p>25 I mean, I scrolled, but even once a month is</p>
Page 91	Page 92
<p>1 probably too much for text messages between me and Paul</p> <p>2 and -- you know, or me and Jim, so --</p> <p>3 Q Okay.</p> <p>4 MS. LEEPER: I think that's the end of the</p> <p>5 questions that I have for you, Mel. Thank you for your</p> <p>6 time today and for answering all of my questions.</p> <p>7 I do want to before I give up my time sort of make</p> <p>8 like a comment on the record, Drew, that I feel it's</p> <p>9 pretty clear that Mel hasn't conducted a full search and a</p> <p>10 thorough search responsive to our document requests and,</p> <p>11 you know, Requests for Production, and so I was wondering</p> <p>12 if you would commit on the record to working with him to</p> <p>13 conduct that thorough and full search.</p> <p>14 MR. STOKESBARY: I'm not sure I share your</p> <p>15 contention, Simone. I mean, it sounds like he conducted a</p> <p>16 search of his -- It sounds like he conducted more than</p> <p>17 what was necessary.</p> <p>18 It sounds like with respect to communications with</p> <p>19 his brother Paul he did a search on his own, and then he</p> <p>20 followed up with another conversation just to verify that</p> <p>21 he wasn't missing something. So I'm not sure I share your</p> <p>22 contention; but that said, we will be glad to make sure</p> <p>23 that we have fully complied with any Requests for</p> <p>24 Production.</p> <p>25 MS. LEEPER: Yeah, I'll just follow up for</p>	<p>1 the record that I think it's pretty clear that the search</p> <p>2 only went back to the beginning of this year, maybe a few</p> <p>3 months prior, and the Requests for Production are for</p> <p>4 communications throughout the entire period of</p> <p>5 redistricting; and so that would require a more thorough</p> <p>6 search, both of the text messages and also of the emails,</p> <p>7 any other form of communication that Mel was using during</p> <p>8 that time period.</p> <p>9 That's it from us. I don't know, Andrew, if the</p> <p>10 state has any questions.</p> <p>11 Thank you again for your time, Mel.</p> <p>12 THE WITNESS: You're welcome.</p> <p>13 MR. HUGHES: Nothing from the state. Thank</p> <p>14 you.</p> <p>15 Nothing from the state. Thanks.</p> <p>16 Thank you, Mr. Campos.</p> <p>17 THE WITNESS: You're very welcome. Glad to</p> <p>18 help.</p> <p>19 MS. LEEPER: Thank you.</p> <p>20 MR. STOKESBARY: Mel, I would like to ask</p> <p>21 you just a couple of questions, if that's okay.</p> <p>22 THE WITNESS: Definitely.</p> <p>23 E X A M I N A T I O N</p> <p>24 BY MR. STOKESBARY:</p> <p>25 Q So just kind of three general questions a little --</p>

Page 93

1 they've got a few subparts.  
 2 Earlier on Simone was asking you about, you know,  
 3 you growing up in the area where you've lived, and you  
 4 mentioned that you've lived in various parts of Central  
 5 and Southeast Washington; do you remember that?  
 6 A Yes.  
 7 Q And you live in Kennewick now; correct?  
 8 A Correct.  
 9 Q And Kennewick is part of the Tri-Cities. Does it  
 10 feel --  
 11 A Yes.  
 12 Q -- like the Tri-Cities are kind of a single  
 13 community?  
 14 A Well, definitely. You know, it's why they call it  
 15 Tri-Cities, yes.  
 16 Q What about Yakima, does it feel like Pasco or  
 17 Kennewick or Richland is part of the same community as  
 18 Yakima?  
 19 A I don't think so, not as close as the Tri-Cities,  
 20 although I mean, I have a strong relationship with again,  
 21 the Yakima sister city. My family lives in Yakima. But  
 22 no, they're pretty much separate communities.  
 23 Q Okay. And what about the Yakama Reservation? You  
 24 mentioned that you went to White Swan High School.  
 25 Does the Tri-Cities, do they feel like they're part

Page 95

1 in your area are becoming more Democrat overall or more  
 2 Republican overall, or if it's kind of fixed?  
 3 A I think the trend is switching to Republican.  
 4 Conservative, I should say.  
 5 Q Okay. And then a last little set of questions.  
 6 Earlier in response to something Simone asked you talked  
 7 about talking with Jim Troyer looking for Hispanic  
 8 candidates for office, and you said that you want more  
 9 Hispanics elected so there's more representation. I want  
 10 to ask a followup question about that.  
 11 If you're filling out your own ballot and there was  
 12 two candidates that were on the ballot, one was a Latino  
 13 or Hispanic who was a Democrat, and the other is a white  
 14 non-Hispanic who was a Republican or conservative, without  
 15 knowing anything else which of those two are you more  
 16 likely to choose to vote for?  
 17 A Definitely the conservative.  
 18 Q Do you --  
 19 MS. LEEPER: I'm sorry. Just really  
 20 quickly -- Mel beat me to it -- I was unmuting to object  
 21 to form.  
 22 Q (By Mr. Stokesbary) And Mel, it's okay if you don't  
 23 know this, but do you have any sense whether other folks  
 24 in your area, you know, from your church or your family,  
 25 your neighbors, do they engage in that same kind of

Page 94

1 of the same community as the Yakama Reservation?  
 2 A Probably not. The Yakama Reservation, it has  
 3 stronger ties with Yakima, the City of Yakima, and not so  
 4 much with the Tri-Cities.  
 5 Q Okay. Thanks, Mel. Moving on.  
 6 This is always hard for me as the white guy, so I  
 7 want to be respectful of the terms that you prefer, Mel.  
 8 You identified yourself as Mexican.  
 9 Fair to say that's a subset of Hispanic or Latino,  
 10 so you would also consider yourself Hispanic or Latino;  
 11 correct?  
 12 A Correct.  
 13 Q And you said that you're also a Republican?  
 14 A Correct.  
 15 Q Do you know many other folks in your community that  
 16 are Republicans who are also Hispanic or Latino?  
 17 A Yes.  
 18 Q So you mentioned a few times about, you know, this  
 19 presumption perhaps in the media that Hispanics tend to be  
 20 Democrats. In your own experience do you agree with that  
 21 assumption?  
 22 A Yeah. Yes. I'm sorry.  
 23 Q Okay. Oh, I'm sorry?  
 24 A Yes.  
 25 Q Do you have any sense whether Hispanics or Latinos

Page 96

1 analysis as you do when it comes to those kinds of  
 2 choices?  
 3 MS. LEEPER: I'm going to object to form  
 4 again.  
 5 A Again -- Sorry.  
 6 (Court reporter request to repeat answer.)  
 7 A Oh, okay. So yeah, I would hope that they would  
 8 vote their values.  
 9 MR. STOKESBARY: Okay. That's all I have  
 10 for you, Mel. Thanks so much.  
 11 THE WITNESS: Thank you.  
 12 MS. LEEPER: Okay. I think that is all. I  
 13 think we can just hop off the record; is that right,  
 14 Jeanne?  
 15 (Discussion re reviewing transcript.)  
 16 (Deposition concluded at 12:29 p.m.)  
 17 (Signature reserved.)  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Ismael G. Campos

October 13, 2022

Page 97	Page 98
<p>1                    CERTIFICATE                  2    STATE OF WASHINGTON )                                            ) SS                  3    County of King        )                  4            I, the undersigned Washington Certified Court                  5    Reporter, pursuant to RCW 5.28.010 authorized to                  6    administer oaths and affirmations in and for the State of                  7    Washington, do hereby certify:                  8            That the annexed and foregoing deposition of the                  9    witness named herein was taken stenographically before me                  10   and reduced to typewritten form under my direction.                  11          I further certify that the witness examined will be                  12   given an opportunity to review and sign their deposition                  13   after the same is transcribed, unless indicated in the                  14   record that the parties and witness waived the signing.                  15          I further certify that all objections made at the                  16   time of said examination to my qualifications or the                  17   manner of taking the deposition or to the conduct of any                  18   party have been noted by me upon the deposition.                  19          I further certify that I am not a relative or an                  20   employee or attorney or counsel of any of the parties to                  21   said action, or a relative or employee of any such                  22   attorney or counsel, and that I am not financially                  23   interested in the said action or the outcome thereof.                  24          I further certify that the witness before examination                  25   was by me duly sworn to testify the truth, the whole                           truth, and nothing but the truth.                           I further certify that the deposition, as                           transcribed, is a full, true and correct transcript of the                           testimony, including questions and answers and all                           objections, motions and exceptions of counsel made and                           taken at the time of the foregoing examination and was                           prepared pursuant to Washington Administrative Code                           308-14-135, the transcript preparation format guideline.                           IN WITNESS WHEREOF, I have hereunto set my                           hand and this                           23rd day of October, 2022.</p> <div style="display: flex; align-items: center; margin-top: 10px;"> </div> <p style="font-size: small; margin-top: 5px;">                     Jeanne M. Gersten, RDR, CCR                      Registered Diplomat Reporter                      Washington CCR No. 2711                      License effective until April 2, 2023                      Residing at Seattle, Washington                 </p>	<p>1                    CHANGE/SIGNATURE SHEET                  2                    I, the undersigned, ISMAEL G. CAMPOS, hereby                  3    certify that I have read the foregoing deposition and                  4    that, to the best of my knowledge, said deposition is true                  5    and accurate, with the exception of the following                  6    corrections listed below:                  7    PAGE    LINE        CHANGE        REASON                  8    _____                  9    _____                  10   _____                  11   _____                  12   _____                  13   _____                  14   _____                  15   _____                  16   _____                  17   _____                  18   _____                  19   _____                  20   _____                  21   _____                  22   _____                  23   _____                  24   _____                  25   _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px; width: 80%; margin-left: auto; margin-right: auto;"> <span>Signature</span> <span>Date</span> </div> <p style="margin-top: 10px;">                     Witness: Ismael G. Campos                      Soto Palmer, et al. v. Hobbs, et al.                      USDC Western District of Washington                      Cause No. 3:22-cv-05035-RSL                      Date: October 13, 2022                      Reported by: Jeanne M. Gersten, RDR, CCR No. 2711                      LAKESIDE REPORTING                      (833) 365-3376                      Jeanne@LakesideReporting.com                      Contact@LakesideReporting.com                 </p>

25 (Pages 97 to 98)

Soto Palmer, et al. v. Hobbs, et al.  
 Lakeside Reporting (833) 365-3376

<b>A</b>	63:18 73:4	33:17	<b>appreciated</b>	86:24
<b>a.m</b> 1:20 4:2	<b>ago</b> 17:18 18:6	<b>Angeles</b> 2:19	15:12	<b>assumption</b> 39:1
44:24,24 75:24	31:9 50:24	<b>ANNABELLE</b>	<b>apprehensive</b>	39:6 65:5,7,9
75:24 88:17	52:2,4 54:13	2:9	10:1	65:10,11 66:2
<b>ability</b> 35:11	71:11 82:12,13	<b>annexed</b> 97:6	<b>approved</b> 73:11	66:5,17,19
<b>able</b> 6:7 15:10	<b>agree</b> 61:5,19	<b>announced</b>	73:16	94:21
76:11 81:11	86:6,25 94:20	20:25	<b>approximation</b>	<b>attention</b> 45:23
<b>Absolutely</b>	<b>agreed</b> 86:6	<b>announcement</b>	56:6	74:14 85:8
68:12	<b>agreeing</b> 84:23	21:1	<b>April</b> 97:23	<b>attorney</b> 3:5
<b>acceptable</b> 62:4	<b>agricultural</b>	<b>answer</b> 5:10,17	<b>area</b> 26:12 48:7	4:18 9:23 10:4
<b>accident</b> 49:19	59:4	6:5,7 7:1 9:3,6	49:13 50:3,9	10:11,12,13
<b>accurate</b> 9:12	<b>Aguilar</b> 43:17	11:19,20 23:17	56:21 59:5	46:19 97:12,13
98:3	<b>AHarless@Ca...</b>	41:18 57:15	70:1 93:3 95:1	<b>attorney-client</b>
<b>acquaintances...</b>	2:13	60:9 61:9,23	95:24	41:16 46:14
43:1	<b>ahead</b> 9:7 15:9	67:18 70:19	<b>areas</b> 49:17	80:12
<b>acquainted</b> 71:6	15:11 25:21	80:13 85:3	<b>articles</b> 60:16	<b>attorneys</b> 3:4
<b>acronym</b> 65:14	41:22 60:9	96:6	<b>ASEEM</b> 2:10	4:11,19 6:23
<b>Act</b> 47:6 70:15	67:18 68:12	<b>answered</b> 65:24	<b>ashamed</b> 49:1	10:20 47:12,19
<b>action</b> 97:12,13	70:19 72:9,10	<b>answering</b> 91:6	<b>aside</b> 74:22 75:3	76:7 80:6 85:5
<b>active</b> 51:20	74:21 76:10,17	<b>answers</b> 5:18	75:9	<b>authorized</b> 97:4
<b>Adams</b> 2:4	76:18	8:12,23 84:20	<b>asked</b> 7:2 13:13	<b>Avenue</b> 2:23 3:6
55:11 59:9,10	<b>al</b> 1:6 2:7 98:20	84:21,23 86:3	47:13 70:13	<b>average</b> 56:8
<b>add</b> 9:5 29:22	98:20	97:16	89:14 95:6	<b>awake</b> 51:12
87:1	<b>Alberto</b> 43:11	<b>Anton</b> 84:2	<b>asking</b> 9:22 12:7	<b>aware</b> 19:25
<b>added</b> 28:11	<b>alert</b> 51:13	<b>anybody</b> 10:25	12:19 15:13	21:22 35:9
<b>additional</b> 9:2	<b>Alex</b> 1:14 42:15	41:13 75:19	26:17 28:13	45:20 58:4
70:9	43:3	78:11 82:3	32:20 33:2	59:19 60:4
<b>address</b> 7:17	<b>alive</b> 71:24	<b>anymore</b> 71:23	44:6 46:16	61:1 74:11,13
<b>administer</b> 97:5	<b>Alliance</b> 50:20	78:20	47:8 54:23	75:19
<b>Administrative</b>	50:22	<b>anyway</b> 19:19	68:10,15,25	
97:18	<b>Almeida</b> 26:3,4	30:20 31:13,25	78:3 80:9,10	<b>B</b>
<b>advance</b> 44:5,13	33:18	<b>anyways</b> 24:16	81:23 93:2	<b>B</b> 3:17
<b>advisor</b> 50:13,15	<b>Amended</b> 81:5	32:12	<b>Assistant</b> 3:4	<b>back</b> 17:17 22:5
50:17 51:13	<b>American</b> 2:17	<b>AP</b> 49:7	<b>association</b> 29:2	24:18,21 29:13
<b>affect</b> 34:21,23	19:14	<b>apart</b> 30:11	<b>assume</b> 6:6 43:6	32:14,22 35:5
36:4	<b>amount</b> 36:15	<b>apologies</b> 56:23	69:6,13,18	44:14,25 45:2
<b>affiliated</b> 25:10	<b>AMulji@Cam...</b>	<b>apologize</b> 54:20	70:6 75:17	45:3 47:25
<b>affiliation</b> 21:23	2:13	72:10	<b>assumed</b> 24:12	48:13 50:7
22:2	<b>analysis</b> 67:5	<b>APPEARAN...</b>	66:9	51:11,13 74:16
<b>affirmations</b>	96:1	3:1	<b>assuming</b> 14:15	76:3 79:12,20
97:5	<b>Andrew</b> 2:4 3:3	<b>apples</b> 60:20	42:1 45:12	79:24 80:1
<b>affirmative</b>	4:16 92:9	<b>application</b>	56:14,22 60:15	82:8,22 87:13
29:12	<b>Andrew.Hugh...</b>	83:10	64:19 65:3	88:10,19 90:2
<b>afternoon</b> 63:24	3:7	<b>appreciate</b> 16:1	69:8 77:20	90:4,9,12,16
<b>age</b> 59:24 60:2	<b>Angel</b> 26:6	32:1	85:22,24 86:5	90:20 92:2

<b>background</b> 48:2	59:20 71:7	<b>broken</b> 66:22 67:1	44:1 50:6 52:4 62:23,23 70:21	<b>case</b> 4:12 14:11 14:13 16:3,5
<b>bad</b> 16:13	<b>best</b> 5:10 89:23 98:3	<b>brother</b> 11:12 11:13,24 12:3	78:14 83:15 89:4,14	16:24 22:21,22 23:14 24:4
<b>ballot</b> 75:8 95:11,12	<b>Bethany</b> 48:17	13:18 16:19 17:1,24 19:10	<b>calling</b> 32:24 53:7	29:14 37:3,13 37:19,23 38:2
<b>ballpark</b> 36:16 82:9	<b>better</b> 32:19	32:2 37:12,19 78:13 82:15	<b>calls</b> 23:15 25:23 37:8 52:18	39:22 41:9,15 45:11,15,16,16
<b>bank</b> 51:14 52:2 53:7,12	<b>Bible</b> 48:17	83:7,17 89:3 89:12 91:19	<b>campaign</b> 2:8,11 35:24,25 36:5	46:2,3,6,20,24 47:2,3,10,15
<b>barrier</b> 37:2	<b>biggest</b> 35:22 62:20	<b>brother's</b> 17:4	36:7 52:3,8	76:5 85:1,6,14
<b>base</b> 28:25	<b>bit</b> 5:7,12 6:13 6:17 7:9 9:16	<b>brothers</b> 33:20	<b>campaigning</b> 36:2,5 53:6	<b>Catholic</b> 28:22 62:11
<b>baseball</b> 65:18	22:5,21 24:20	<b>brought</b> 29:15 48:10	69:18	<b>Catly</b> 43:15
<b>based</b> 23:11 24:15 29:3	29:13 44:5	<b>Brown</b> 31:6,6,14 31:21 72:2,7	<b>campaigns</b> 37:1 51:25 53:10	<b>Caucus</b> 11:14,24 16:20
61:15 62:3,10 63:5 64:6 65:1 73:18	48:1 65:23 69:10	<b>browser</b> 14:23 15:17 76:21	<b>Campos</b> 1:13,18 3:12 4:4,10 7:5	<b>Cause</b> 98:21
<b>basically</b> 46:16 47:3 68:15 70:2	<b>blue</b> 15:19	<b>bullying</b> 63:5	7:7,7 11:11 16:19 76:25	<b>CBC</b> 49:7
<b>basics</b> 48:1,22	<b>book</b> 26:10 36:23	<b>bunch</b> 30:8	84:25 86:22 89:3 92:16	<b>CCR</b> 1:22 97:22 97:23 98:23
<b>Basin</b> 49:4	<b>booth</b> 66:11	<b>bus</b> 52:24	98:2,20	<b>census</b> 57:18 69:25
<b>basing</b> 57:18,22	<b>booths</b> 65:17,17 66:7	<b>Bush</b> 53:12	<b>Canada</b> 51:14	<b>center</b> 2:8,11 23:13 24:4
<b>basis</b> 28:2,5,14 28:18 29:5	<b>born</b> 48:9 50:5 63:21,21	<b>business</b> 19:1 22:16 28:9 50:14	<b>candidate</b> 32:19 33:1 39:15	<b>Center.org</b> 2:13 2:13
46:13 60:12 80:12	<b>bosses</b> 62:19 63:11	<b>businesses</b> 28:11 60:15	68:21 69:12	<b>Central</b> 93:4
<b>beat</b> 95:20	<b>bottom</b> 80:24 81:17	<b>button</b> 15:19	<b>candidate's</b> 52:6	<b>certainly</b> 83:7
<b>becoming</b> 29:14 89:15 95:1	<b>bought</b> 51:16	<hr/> <b>C</b> <hr/>	<b>candidates</b> 25:5 25:24 26:1,8	<b>certified</b> 18:19 97:4
<b>beeping</b> 23:19	<b>boundaries</b> 59:23 72:16,23	<b>C</b> 2:1 97:1,1	26:14,18,22,25 32:20 33:15	<b>certify</b> 97:5,7,9 97:11,14,15
<b>beets</b> 63:15,24	<b>box</b> 75:8 76:7	<b>C-A-M-P-O-S</b> 7:8	36:10 38:22 67:23,24 68:6	98:2
<b>beginning</b> 73:11 73:16 90:4,16 92:2	<b>boy</b> 50:5	<b>calendar</b> 15:3	68:7 69:3,4 74:22,24 75:9	<b>challenging</b> 45:11 46:3,20
<b>behalf</b> 2:8,15,21	<b>BPhillips@Ca...</b> 2:14	<b>California</b> 2:19 48:12,18 60:18	75:11,11 79:22 87:16 95:8,12	46:24 47:1,5
<b>belief</b> 28:5,18	<b>break</b> 5:25 6:12 6:16,18 23:22	61:1,3,4	<b>capacity</b> 1:9 18:12 63:12	<b>CHALMERS</b> 2:4
<b>believe</b> 24:24	44:20,24 55:20	<b>call</b> 7:14,16 22:14 23:3,18	<b>capitol</b> 17:11 18:21 19:2,8,9	<b>Chamber</b> 21:12 21:13,16 22:2
<b>bell</b> 36:17	75:24 88:10,17	25:4,20 52:1 61:10 62:12,22	76:23,24 77:14 77:14	39:7,8
<b>BEN</b> 2:10	<b>breakdown</b> 67:5	65:21 93:14	<b>caption</b> 77:14	<b>chance</b> 76:7,19 76:25 84:14
<b>Benancio</b> 45:5,8	<b>breaking</b> 89:2	<b>called</b> 14:6,7 17:10 19:11	<b>care</b> 28:6 36:22 68:23	85:19,20
<b>Benji</b> 43:17	<b>Brewster</b> 54:15 54:16,17	33:12 40:4		<b>change</b> 63:14,25
<b>Benton</b> 53:25 54:3,4 55:11 58:20,25 59:20	<b>bring</b> 17:17 47:25 85:16			
	<b>broadly</b> 67:11			
	<b>broke</b> 7:9			



98:5 <b>CHANGE/SI...</b> 98:1 <b>changed</b> 70:1 <b>changes</b> 70:7 <b>character</b> 35:10 <b>chat</b> 76:6 80:20 80:25 81:1 <b>Chernobyl</b> 49:18 <b>choices</b> 96:2 <b>choose</b> 95:16 <b>church</b> 29:3 51:22 95:24 <b>churchgoer</b> 29:3 <b>cities</b> 22:6,11 54:5 56:16 57:20 71:15 <b>citizen</b> 60:2 73:3 <b>city</b> 18:15,17 19:22 20:7 22:17 57:8 58:11 93:21 94:3 <b>civic</b> 70:20 <b>clarification</b> 6:4 9:3 12:18 18:16 66:20 <b>clarify</b> 9:6 <b>clarifying</b> 41:23 <b>clean</b> 49:13,15 <b>cleaner</b> 5:11 <b>clear</b> 5:17 9:21 28:13 45:15 64:25 73:8 85:10,13 88:24 91:9 92:1 <b>click</b> 76:13 81:2 81:10 <b>clicked</b> 76:24 <b>client</b> 23:19 <b>close</b> 15:9,11,13 93:19 <b>closed</b> 15:8 49:18	<b>closest</b> 56:6 <b>clothing</b> 49:23 50:2 51:10 <b>clouds</b> 15:24 <b>Coalition</b> 44:2 <b>Code</b> 97:18 <b>coffee</b> 18:7 <b>college</b> 48:12,16 48:17,17,21 49:5 <b>Color</b> 44:2 <b>Columbia</b> 49:4 <b>come</b> 19:7 22:22 22:25 26:21 35:13 38:23 39:19 40:2 47:15 48:24 51:9 79:20 80:2 <b>comes</b> 36:12 96:1 <b>comfort</b> 90:19 <b>comfortable</b> 33:12 <b>coming</b> 15:10 19:11 20:4 24:22 26:11 28:15,15 49:15 52:25 60:18 63:23 85:8 88:10 <b>comment</b> 91:8 <b>comments</b> 66:8 <b>commission</b> 10:24 11:1 74:2,5,12 78:4 78:12 <b>commissioner</b> 72:1 <b>commissioners</b> 10:23 <b>commit</b> 91:12 <b>commitment</b> 36:3 <b>commitments</b>	38:11 <b>committee</b> 19:12 <b>communication</b> 79:1 83:9 92:7 <b>communicatio...</b> 12:9,16 13:25 41:19 78:1,23 79:3 80:1 82:16 84:2 87:3,15 89:1,3 89:5,9,13 91:18 92:4 <b>communities</b> 93:22 <b>community</b> 23:11 24:13 26:15 27:7,13 28:19,22 29:2 30:18 34:19 51:20 56:4 58:11 61:6,20 62:15 71:3 93:13,17 94:1 94:15 <b>Complaint</b> 16:5 16:8 45:14 <b>complaints</b> 62:19 <b>complete</b> 8:23 9:12 <b>Complex</b> 3:5 <b>complied</b> 91:23 <b>computer</b> 15:24 86:17 <b>computers</b> 78:11 <b>concept</b> 37:18 38:1 <b>concern</b> 35:22 36:25 <b>concerning</b> 89:20 <b>concluded</b> 34:10 96:16 <b>conclusion</b>	23:16 <b>concur</b> 86:5 <b>conditions</b> 8:17 <b>conduct</b> 77:25 78:6 80:3,7 81:25 91:13 97:10 <b>conducted</b> 67:4 88:25 91:9,15 91:16 <b>Conference</b> 65:15 <b>confirming</b> 86:11 <b>Congratulatio...</b> 50:25 <b>Congress</b> 52:15 <b>connected</b> 23:13 <b>connection</b> 18:12 69:15 70:25 71:2,3 71:15 75:23 <b>connections</b> 19:1,2 22:15 22:16 <b>conservative</b> 28:12 35:6,7 35:11 69:7,7 69:15 95:4,14 95:17 <b>consider</b> 94:10 <b>considering</b> 13:12 87:5 <b>contact</b> 25:15 40:2,23 <b>Contact@Lak...</b> 1:24 98:25 <b>contaminated</b> 49:14 <b>contamination</b> 49:12,16 <b>content</b> 9:22 37:17 46:18 47:8 <b>contention</b>	91:15,22 <b>context</b> 8:22 13:2,7 17:9 <b>continue</b> 13:11 25:22 38:14 <b>continued</b> 2:25 3:1 <b>conversation</b> 4:22 12:14 22:24 30:1,3 32:14,17,22 40:12 41:6 47:9,19 91:20 <b>conversations</b> 9:22 26:24 28:16 46:5,10 46:18 66:11 <b>convince</b> 35:11 <b>cool</b> 19:18 <b>copy</b> 14:16 <b>correct</b> 16:21 24:25 25:1 29:17,18 33:24 34:2,25 35:1 35:15,16 40:6 41:25 53:21,22 59:15 65:4 70:24 80:4 81:12 87:6 89:6 90:5,17 93:7,8 94:11 94:12,14 97:16 <b>corrections</b> 98:4 <b>correctly</b> 56:2 <b>cost</b> 36:14 37:1 <b>council</b> 19:7 <b>counsel</b> 4:13 14:1 80:15 97:12,13,17 <b>counseling</b> 48:23 <b>counties</b> 54:9 55:12 56:16 <b>county</b> 53:25 54:3,12,15,17
---	---	---	---	---

56:19 58:20	<b>decided</b> 24:9	4:16,24 7:14	32:16 36:20	14:6,16,19
59:9,10,14,15	47:15	8:3,22 9:2,17	37:15,25 38:6	16:6,17 76:9
59:21 71:7,13	<b>decision</b> 37:13	9:19,24 10:5	78:20 83:19	76:14,19 77:1
97:3	<b>DEFENDANT</b>	10:21 11:7	89:15,19,21,23	77:9,17 78:25
<b>couple</b> 4:23 23:6	3:2	12:2 13:23	<b>discussed</b> 12:12	80:17 81:4,15
31:23 92:21	<b>Defendants</b> 1:11	14:1,4 15:8	16:10,23 20:12	81:18,21 82:14
<b>course</b> 4:17	77:15	16:2,11,16	20:16,16 21:17	84:9,14,18,22
11:23 19:25	<b>Defense</b> 2:17	40:9 55:9	30:14,22,22	84:24 85:18,23
33:11 36:22	<b>define</b> 55:20	96:16 97:6,8	37:20 41:11,14	86:1,4,7,8,23
51:22 59:21	61:13 62:5,6	97:10,11,15	64:4	91:10
60:19 61:1	<b>definitely</b> 33:12	98:2,3	<b>discussing</b> 18:7	<b>documentation</b>
63:21,24 66:6	55:14 92:22	<b>depositions</b> 6:23	29:19	12:8,19 85:24
72:2	93:14 95:17	<b>Deschutes</b> 2:23	<b>discussion</b> 4:3	<b>documents</b>
<b>court</b> 1:4 18:16	<b>definition</b> 54:21	<b>detail</b> 45:23	24:19 29:16	10:16 14:3
47:2,16,16,17	<b>definitions</b>	<b>details</b> 9:2 45:22	35:21 36:6	16:3 76:5
75:23 96:6	81:16	47:7	44:23 75:22	77:21 78:1,3,4
97:4	<b>degree</b> 48:23	<b>determine</b> 67:5	87:21 96:15	78:15,17 80:15
<b>covered</b> 5:7	49:4	<b>devout</b> 29:3	<b>discussions</b>	81:19,23 82:1
53:14 90:9	<b>degrees</b> 49:3	<b>DEYLIN</b> 2:17	13:18 30:11	82:2 84:8
<b>covering</b> 89:17	<b>delayed</b> 44:10	<b>difference</b> 64:23	32:18 38:17,22	85:17 86:10
<b>COVID</b> 21:19	<b>delete</b> 83:25	<b>differences</b>	41:7	89:1
42:24	<b>deleted</b> 82:20	35:14	<b>dishes</b> 51:10	<b>doing</b> 14:8 16:1
<b>cultural</b> 19:1	83:16,22	<b>different</b> 18:8	<b>displayed</b> 76:14	23:25
22:16 69:13	<b>delved</b> 70:12	26:12 55:20	84:9 85:18	<b>donated</b> 19:3,4
<b>current</b> 72:17	<b>Delvin</b> 71:8,25	62:8,8 65:24	86:8	<b>double</b> 81:2
73:2,5,10,14	<b>Democrat</b> 22:3	67:24 68:7	<b>district</b> 1:4,4	<b>downloaded</b>
<b>currently</b> 50:12	24:12,15 34:20	69:3 71:16	12:11 13:7	86:13
70:22	65:8 66:4,17	74:16 75:11	24:2,13,14	<b>drawing</b> 23:25
<b>cut</b> 11:19	73:24 95:1,13	<b>differently</b> 62:5	29:21,23,24	<b>drawn</b> 24:5
<b>cycle</b> 38:10	<b>Democratic</b>	<b>difficulty</b> 75:23	30:21 31:15,17	<b>Drew</b> 9:25 10:3
	66:19	<b>dig</b> 24:20 36:24	34:1,5,8,16,17	10:4,7 12:20
<b>D</b>	<b>Democrats</b>	<b>dinner</b> 51:9	34:24 35:2,15	14:5,24 16:6
<b>Dad</b> 48:9 63:22	31:24 65:19	<b>dinnings</b> 42:24	35:18,19 45:11	16:10 39:21
<b>dark</b> 53:2	94:20	<b>Diplomate</b> 1:23	46:3,21,24	40:4,6,9,10
<b>data</b> 28:16	<b>demographics</b>	97:22	70:8,23 71:1,4	45:13,14 46:6
<b>date</b> 50:10 82:8	55:25 56:17	<b>direction</b> 97:7	71:8 72:17,19	47:11 91:8
98:18,22	60:4	<b>directly</b> 60:23	72:23 73:3,9	<b>drink</b> 6:12
<b>day</b> 9:25 63:20	<b>denied</b> 61:15	<b>dirt</b> 36:24	73:15,17,21	<b>drive</b> 63:13
97:20	63:1	<b>discrimination</b>	87:6,9 98:21	<b>driver</b> 63:13
<b>days</b> 50:7,24	<b>depending</b>	61:6,11,14,16	<b>districts</b> 26:12	<b>drop</b> 76:6
62:23	49:24 69:17,25	61:19,20,25	70:4	<b>DStokesbary...</b>
<b>DC</b> 2:12	75:13	62:6,21	<b>dive</b> 12:17	2:6
<b>decade</b> 34:15	<b>depends</b> 35:23	<b>discuss</b> 10:20,23	<b>Division</b> 3:5	<b>DThrift-Viver...</b>
60:5	<b>deposed</b> 5:1	11:7 12:2,10	<b>Doc</b> 52:5 53:3	2:20
<b>decide</b> 38:24	<b>deposition</b> 1:17	12:25 13:4	<b>document</b> 14:5	<b>duly</b> 97:14

<b>duties</b> 17:24	79:10,11 82:6	98:20	<b>F</b> 97:1	63:17
<hr/> <b>E</b> <hr/>	83:10 87:4	<b>ethnicity</b> 7:23	<b>Facebook</b> 31:8	<b>farmers</b> 62:17
<b>E</b> 2:1,1 3:17 4:8	<b>emailed</b> 87:23	<b>Evan</b> 84:5	83:3	62:18 64:1
92:23 97:1,1	<b>emails</b> 46:11	<b>evangelical</b>	<b>faced</b> 61:20	<b>farms</b> 62:17
<b>earlier</b> 16:18	82:8 83:16,25	28:22	62:15	<b>farmwork</b> 63:16
51:19 53:14,20	87:8,11,20	<b>Evangelina</b>	<b>facilities</b> 19:6	<b>Faviola</b> 43:13
70:22 82:5	88:2,3 92:6	43:17	49:17	<b>February</b> 38:15
93:2 95:6	<b>employed</b> 11:13	<b>everybody</b> 27:10	<b>fact</b> 13:12 16:18	79:21
<b>easier</b> 4:25 5:6	11:24 50:12	<b>everyone's</b> 4:25	22:1 24:15	<b>Federal</b> 70:14
5:12	<b>employee</b> 25:6,8	<b>exactly</b> 25:3	28:11,20 29:1	<b>feel</b> 32:23 69:11
<b>easiest</b> 80:20	97:12,12	50:18	29:22 36:21,23	70:25 76:22
81:8	<b>employment</b>	<b>examination</b>	57:23 60:14,17	91:8 93:10,16
<b>Eastern</b> 55:4	60:25	1:17 3:11	62:10,22 64:6	93:25
<b>Eddie@Morfi...</b>	<b>encapsulate</b>	97:10,14,17	64:19 66:8,15	<b>Fellow</b> 2:10
2:24	24:10	<b>examined</b> 97:7	71:5,14 72:18	<b>felt</b> 32:8,18
<b>educational</b> 2:17	<b>encompass</b>	<b>example</b> 61:12	<b>factor</b> 28:20	<b>field</b> 60:20
22:16 48:2	55:10	<b>exception</b> 98:3	37:6	<b>Fifteen</b> 10:15
<b>EDUARDO</b>	<b>encourage</b> 37:19	<b>exceptions</b> 97:17	<b>fair</b> 72:20 94:9	16:17
2:22	<b>encouraged</b>	<b>exchanged</b>	<b>fairly</b> 31:18,19	<b>Fifth</b> 3:6
<b>effect</b> 23:10 47:2	19:24	46:11 83:17	71:9	<b>filed</b> 16:3
<b>effective</b> 97:23	<b>ended</b> 19:5	<b>Excuse</b> 71:23	<b>familiar</b> 11:10	<b>filing</b> 14:11,13
<b>EHerrera@M...</b>	52:25	85:12	37:11 39:21	<b>filling</b> 95:11
2:19	<b>Energy</b> 50:7	<b>exhibits</b> 86:20	42:6 45:19	<b>finally</b> 9:11
<b>Eighth</b> 29:25	<b>engage</b> 95:25	<b>exists</b> 62:1	46:2 84:15,19	59:14
<b>either</b> 33:11	<b>engine</b> 19:4	<b>exit</b> 80:17	<b>familiarity</b> 69:8	<b>financial</b> 37:1
53:10 64:6	<b>English</b> 18:19	<b>expecting</b> 51:9	69:11	50:13,15,17
73:6 74:7	<b>entail</b> 35:19 36:8	<b>expense</b> 37:4	<b>family</b> 59:21	51:13
86:25	36:20	<b>expensive</b> 61:1	93:21 95:24	<b>financially</b>
<b>elect</b> 35:4	<b>entails</b> 18:25	<b>experience</b> 29:4	<b>far</b> 9:25 12:11	97:13
<b>electable</b> 25:4	<b>enter</b> 40:12	61:25 62:16	13:13 14:5	<b>find</b> 6:11 20:21
25:24,25 26:8	<b>entered</b> 49:20	63:7 65:22,25	21:14 25:14	20:23 21:1
26:10,22	<b>entire</b> 92:4	66:8 94:20	29:25 30:4	77:25 78:23
<b>elected</b> 25:13,14	<b>enunciate</b> 8:2	<b>experienced</b>	32:7 36:2	79:7,11,23
27:4 52:8,11	<b>equal</b> 19:17	61:6 64:3	38:22 44:5,11	81:25 88:4
52:14,16,17	<b>equitable</b> 72:20	<b>explain</b> 6:5 16:7	44:13 45:14	89:17
53:15,18 71:17	<b>ERNEST</b> 2:16	49:9	58:18 61:11,25	<b>fine</b> 29:11 76:11
72:14 95:9	<b>errands</b> 17:13	<b>explaining</b>	62:21 73:2	88:12
<b>election</b> 66:21	<b>especially</b> 4:25	18:24	74:23 75:10	<b>fire</b> 19:3
66:25 75:7	38:12	<b>explains</b> 14:7	78:10 79:12,24	<b>FIRM</b> 2:21,22
<b>elections</b> 65:1	<b>establish</b> 19:1	<b>express</b> 37:22	80:1 86:10	<b>first</b> 26:4 29:14
<b>electoral</b> 26:14	<b>establishing</b>	<b>expressed</b> 32:5	87:15 88:5	30:5,6 33:18
<b>Ellensburg</b> 55:6	22:15	<b>extent</b> 70:2	90:2,21	40:2 45:6 54:3
<b>email</b> 15:3,9,13	<b>estimate</b> 77:19	73:19	<b>farm</b> 60:20	76:12 77:14,17
45:13 46:7	82:9	<hr/> <b>F</b> <hr/>	63:11	82:7,10 86:1
	<b>et</b> 1:6 2:7 98:20		<b>farmer</b> 62:19	<b>five</b> 25:17 86:10

<b>five-minute</b> 88:10	<b>friend</b> 71:9	<b>gerrymander</b> 46:4,21,25	6:10,25 8:3,5	38:11
<b>fixed</b> 95:2	<b>friends</b> 31:8,8 31:23,25	<b>Gersten</b> 1:22	9:21 19:5	<b>Grant</b> 54:14
<b>flag</b> 19:13,14	<b>front</b> 15:5	97:22 98:23	28:17 29:11,13	55:12 59:14,15
<b>flags</b> 19:16	<b>fruition</b> 47:15	<b>getting</b> 23:18	30:3 34:10	<b>great</b> 7:12,16
<b>Floor</b> 2:18	<b>full</b> 5:8,9,20 7:6	47:4 65:10	37:14 38:4	15:25 22:17
<b>fly</b> 5:22,24	8:23 9:12	66:5	41:18 43:5,6	32:25 39:14,15
<b>flying</b> 5:22	41:24 91:9,13	<b>gist</b> 33:1 47:4	45:3 46:9	49:9 62:17
<b>focused</b> 67:8	97:16	<b>give</b> 6:17 8:11	47:25 48:1,22	76:17 81:14
<b>focusing</b> 22:21	<b>fully</b> 91:23	9:12 62:2	50:23 54:22	<b>grew</b> 58:3 59:22
75:4	<b>fun</b> 62:24 64:5	74:19 76:19	55:19 56:15	<b>Grose</b> 84:3
<b>folks</b> 94:15	<b>Fund</b> 2:18	85:19 91:7	62:2 72:21	<b>ground</b> 4:23
95:23	<b>funder</b> 36:13	<b>given</b> 60:21	76:6,6,8,18	<b>group</b> 18:12,24
<b>follow</b> 31:10	<b>fundraising</b> 36:19	69:18 97:8	77:13 80:8,11	51:19 68:25
91:25	<b>funds</b> 35:24 36:5	<b>gives</b> 17:12	80:17,19 81:7	69:1 74:23,25
<b>followed</b> 91:20	36:9	<b>glad</b> 39:13 91:22	81:14,16 82:14	75:4,12
<b>following</b> 98:3	<b>further</b> 79:18	92:17	84:7,12 85:16	<b>groups</b> 51:21
<b>follows</b> 4:7	89:24 90:9	<b>go</b> 4:23,24 6:12	86:7,16 87:2	<b>growing</b> 48:8
<b>followup</b> 95:10	97:7,9,11,14	9:6 15:9,11	87:17 89:22	93:3
<b>foregoing</b> 97:6	97:15	16:14 17:15	90:16 96:3	<b>grown</b> 60:18
97:17 98:2		18:15 21:13	<b>Gonzalez</b> 7:11	<b>guess</b> 17:17
<b>forever</b> 86:17	<b>G</b>	24:21 25:20	<b>good</b> 4:10 7:15	19:21 22:3,7
<b>forget</b> 12:8	<b>G</b> 1:13,18 3:12	32:14,23 41:22	29:6 31:7,25	22:13 23:3
17:11 21:12	4:4 7:7,7,11	43:7 44:21,25	32:6 33:7	26:11 32:9
50:18	98:2,20	48:3,16 49:17	34:12 44:19	33:1 39:1,3
<b>forgive</b> 51:3	<b>Garcia</b> 41:15	49:21 50:1	71:8,9	47:3 50:19
<b>form</b> 6:24 11:5	45:5,8,10,17	51:11 56:15	<b>gosh</b> 25:16 26:2	55:2,2,6,7,15
11:18 61:8,22	<b>Garza</b> 26:6	60:9 63:23,25	33:20 48:18	55:24 57:7,14
70:17,18 83:9	33:17,18	66:16 67:18	50:5 52:23	58:7 60:3
92:7 95:21	<b>gears</b> 87:2	68:3,12 70:19	53:24 54:2	61:13 63:5
96:3 97:7	<b>gee</b> 54:18 60:14	71:18 72:9,10	56:8 58:21	64:5,21 65:21
<b>formal</b> 40:18	63:20,22	74:16,21 75:21	65:14 69:24	66:4,7 68:15
<b>formality</b> 29:12	<b>general</b> 3:4,5	76:2,10,17,18	70:16 71:11,13	73:6 77:8 85:9
<b>format</b> 97:18	13:3 28:1	78:11,13 79:12	79:21 82:12	<b>guesses</b> 57:13
<b>forth</b> 17:17	30:15 31:2	79:24 82:8,22	<b>gotta</b> 39:23	<b>guessing</b> 56:13
<b>found</b> 82:2	32:14 37:18,25	84:12 87:13	<b>gotten</b> 27:1	58:4,23 59:18
<b>foundation</b> 56:25	54:1 56:2	88:9,19 89:11	38:25	67:19
<b>four</b> 86:12,14	69:23,24 75:6	90:2,9	<b>Gracie</b> 31:9,12	<b>guideline</b> 97:18
<b>Franklin</b> 54:4,5	75:7 92:25	<b>God</b> 16:13	32:19,24	<b>guy</b> 69:18 94:6
55:12 58:22	<b>generalizing</b> 69:20	<b>goes</b> 32:10 43:17	<b>grade</b> 63:23	<b>guys</b> 12:22
59:1,2,19	32:12 34:19	61:25 75:16	<b>graduate</b> 50:23	15:16 31:3
71:13	<b>generally</b> 28:12	78:17 89:20	<b>graduated</b> 48:10	
<b>free</b> 76:22	32:12 34:19	90:12	<b>Grande</b> 7:18	<b>H</b>
<b>fresh</b> 9:7 74:19	<b>George</b> 7:11	<b>going</b> 4:14,20,21	<b>grandfather's</b> 44:16	<b>H</b> 3:17
		4:24 5:5,13 6:6	<b>Grandpa's</b> 36:4	<b>half</b> 48:18 82:10
				<b>hand</b> 63:13 64:2

97:19	<b>hindrance</b> 37:5	<b>hundred</b> 36:17	<b>instances</b> 64:4	40:10 75:3
<b>Hanford</b> 49:6,19	<b>Hispanic</b> 8:4,6	<hr/>	<b>instruct</b> 41:18	77:12 79:13,15
50:9	21:13,15 23:11	<b>I</b>	46:9 80:12	87:14
<b>hang</b> 23:18	25:5 26:15,21	<b>I-S-M-A-E-L</b>	<b>instructions</b>	<b>issues</b> 28:3,3,6,9
<b>Hankins</b> 71:11	33:6,9 39:7	7:7	81:16	28:19
71:21	61:3 65:15	<b>idea</b> 30:8,12,20	<b>interchangeably</b>	<hr/>
<b>happen</b> 9:1 30:1	69:6,7,9,11,12	34:13 35:5	8:4	<b>J</b>
<b>happens</b> 6:25	75:15 94:9,10	54:16 84:4	<b>intercommunity</b>	<b>Jalapeño</b> 33:7
9:4 76:13	94:16 95:7,13	<b>identified</b> 94:8	71:9	<b>James</b> 41:25
<b>hard</b> 94:6	<b>Hispanics</b> 35:6	<b>identify</b> 8:6	<b>interest</b> 66:7	<b>January</b> 38:15
<b>HARLESS</b> 2:9	58:24 60:11	23:12	72:16,22,23	79:21,24 90:20
<b>harm</b> 34:18	61:16 94:19,25	<b>III</b> 45:5	<b>interested</b> 20:2	<b>Jeanne</b> 1:22
35:13	95:9	<b>iMessage</b> 82:25	33:22 97:13	18:18 44:22
<b>Hastings</b> 52:5	<b>historic</b> 17:16	<b>impact</b> 13:19	<b>interrupt</b> 86:18	96:14 97:22
53:3	17:18	<b>impair</b> 8:14,17	<b>intervene</b> 37:23	98:23
<b>head</b> 5:16	<b>historically</b> 61:6	<b>implemented</b>	<b>intervening</b> 63:7	<b>Jeanne's</b> 4:25
<b>Health</b> 49:7	61:20	50:2	<b>intervenor</b> 14:8	5:5,12
<b>hear</b> 43:22 45:6	<b>hit</b> 15:15	<b>importance</b>	16:7 37:13,18	<b>Jeanne@Lake...</b>
<b>heard</b> 21:6 44:1	<b>Hobbs</b> 1:9 41:15	28:11	37:19 38:3	1:24 98:24
65:10	45:11,16,17	<b>important</b> 22:8	40:5 41:9	<b>jeez</b> 30:3 63:9
<b>hearing</b> 8:1 21:5	98:20	22:13 27:9,14	74:10 77:15	<b>Jerome</b> 71:8,25
<b>hearings</b> 74:1,11	<b>hoe</b> 63:24	27:17 28:19,20	<b>Intervenor-De...</b>	<b>Jim</b> 18:1,2 20:13
<b>heart</b> 43:7	<b>hoed</b> 63:15	28:23 72:19	1:15 2:3	20:14 22:23
<b>Hector</b> 33:18	<b>hold</b> 13:10 29:5	89:18	<b>intervenors</b> 38:1	24:25 25:2
<b>height</b> 19:14	<b>home</b> 15:21	<b>impressed</b> 19:13	<b>interworkings</b>	29:16 30:1
<b>held</b> 74:1,12	48:24 51:9	19:15	89:21	31:20 32:15
<b>Heliodora</b> 43:21	<b>homemade</b>	<b>inclination</b> 5:15	<b>introduce</b> 4:12	33:16 35:17
43:24	62:23	<b>include</b> 35:21	<b>Investments</b>	38:20 39:16
<b>help</b> 22:18 45:25	<b>honestly</b> 47:23	<b>includes</b> 38:15	50:18	41:7,24 42:2,3
92:18	<b>honesty</b> 32:1	<b>including</b> 87:5	<b>involved</b> 22:8,22	53:17 78:24
<b>helped</b> 52:8	<b>Honeycutt</b> 52:6	97:16	29:14 38:4	79:4,22 83:11
53:12	52:6,7,10,13	<b>increase</b> 60:24	39:7 42:11	83:17 87:5,12
<b>hereunto</b> 97:19	<b>Honeyford</b> 18:1	<b>increasing</b> 60:13	65:12 73:18	87:15,23,25
<b>HERRERA</b>	19:21 20:4,9	<b>INDEX</b> 3:11	79:16 90:6	90:7,13,14
2:16	20:13,19 21:7	<b>indicated</b> 97:8	<b>involvement</b>	91:2 95:7
<b>Hey</b> 12:10 32:7	53:17	<b>individual</b> 11:10	90:17	<b>Jim's</b> 29:20
46:8 78:13	<b>hop</b> 96:13	42:6,14 52:21	<b>iPhone</b> 81:6	<b>job</b> 17:9,24 49:5
86:9 89:14,18	<b>hope</b> 75:17 96:7	<b>individuals</b> 45:4	<b>Isaac</b> 43:11	49:5 50:21
<b>high</b> 48:3,4 57:6	<b>hopefully</b> 6:10	<b>industry</b> 50:4	<b>Ismael</b> 1:13,18	51:3,5 62:3
57:10 58:6,10	35:10	51:3,4	3:12 4:4 7:7	<b>Johnson</b> 50:17
58:12,15,21,25	<b>hoping</b> 44:13	<b>information</b>	98:2,20	<b>join</b> 19:24,24
59:6 62:21	<b>House</b> 16:19	70:9 85:21	<b>issue</b> 12:16	<b>JOSE</b> 1:13
63:25 93:24	<b>Hughes</b> 3:3 4:16	<b>inherited</b> 34:9	22:25 23:7,13	<b>José</b> 42:7
<b>higher</b> 56:9	56:23 57:2	<b>initial</b> 7:10	23:21 24:4,21	<b>judge</b> 72:12,13
58:16,18	92:13	<b>inquires</b> 41:19	28:4 34:8	72:14

<b>jump</b> 22:5 24:9 46:9	25:3,6,8,9,13 25:14,16 27:3	79:25 81:21 82:19 83:14	64:12,15 67:8 67:23 68:5,17	80:9,14 85:3 86:14,16,19,22
<b>jumping</b> 11:22 56:24	27:20 28:24 29:25 30:4,9	85:4,9 86:20 87:11,12,13,14	69:1,19 73:3 73:19,24 74:24	88:9,15,18,20 91:4,25 92:19
<b>June</b> 44:12	30:14,16 31:7 31:8,14,18,19	87:16,20 88:1 88:3,6 89:21	75:5,11 94:9 94:10,16 95:12	95:19 96:3,12 <b>legal</b> 2:8,10,11
<b>K</b>	31:19 32:8,10 32:20 33:8,8	90:4,8,8,18,22 90:23 91:2,11	<b>Latino/Hispanic</b> 56:4 64:22	2:17 14:10,13 23:16 84:25
<b>Karl</b> 3:4 4:14	33:10 34:7 35:5 36:13,18	92:9 93:2,14 94:15,18 95:23	<b>Latinos</b> 24:12 24:15,19 27:2	85:13 <b>legislative</b> 13:7
<b>Karl.Smith@...</b> 3:7	37:10,15 38:25 39:12,14 40:8	95:24 <b>knowing</b> 95:15	27:3,13,16,16 27:17,21,22,25	29:21,24 30:24 34:1,5,16,17
<b>keep</b> 5:14,18,18 6:1 81:7	40:19 41:4 42:1,2,3,8,18	<b>knowledge</b> 14:10 41:2	28:9,12 35:3,8 37:7 58:24	35:18 45:11 46:3,20 66:23
<b>Kennewick</b> 2:23 7:18 31:17	42:22 43:5,7,9 44:5,11,11,12	46:17,19,22 64:11,14,17	60:10 61:3 65:5,7,19,25	67:2,24 68:7 68:18 69:2
<b>kept</b> 72:15	45:5,6,10,12 45:23,25 47:7	67:22 68:5,16 68:19 69:5	66:3,11 94:25 <b>launch</b> 36:7	70:4,23,25 71:3 72:17,23
<b>kick</b> 15:15,21	47:11,22 48:7 52:1,15 55:16	85:11 98:3 <b>known</b> 30:18	<b>law</b> 2:21,22 70:20	73:3,9,15 87:6 87:9
<b>kid</b> 62:25 64:8	55:16,18,25 56:5,6,7,13,14	51:18	<b>lawsuit</b> 9:14 20:13 21:20	<b>legislators</b> 11:8 <b>legislature</b> 34:11
<b>kind</b> 16:7 20:2 22:3 24:16	57:6,14,15,17 57:17,19,25	<b>L</b>	23:3 24:23 43:6 77:12,24	67:6 73:11 <b>legitimate</b> 23:5
26:20 31:7,9	58:3,7,23 59:3 59:8,11,12,16	<b>labor</b> 60:21,25	79:17 <b>LD</b> 30:7,13	24:8,11 <b>legs</b> 48:24 49:1
32:21 34:12	59:24 60:17,20 61:10,16 62:2	<b>laborer</b> 50:8	32:17 33:16,24	<b>lesser</b> 36:25 <b>let's</b> 44:25 56:17
37:22 45:22	62:7,9,10,11 62:11,12,18,18	<b>lack</b> 56:25	38:8,18 <b>lead</b> 34:17	57:19 76:2,17 81:7
49:25 54:25	62:24,25 63:3 63:5,14,15	<b>lady</b> 39:14	<b>leads</b> 37:7 <b>lean</b> 34:24 73:21	<b>letting</b> 5:4 <b>level</b> 49:24
58:23 62:11,14	64:9,20,22,24 65:6,8 66:16	<b>Lake</b> 54:14 59:15	<b>leaning</b> 73:15,24 <b>leanings</b> 39:7	90:19 <b>levels</b> 49:22
62:16 63:18	66:17 67:13,20 67:21 68:9	<b>LAKESIDE</b> 1:22 98:23	<b>leave</b> 49:12 <b>leaving</b> 51:2	<b>liberal</b> 39:8 75:15
64:19 65:5,20	69:17,22 70:3 70:10,14 71:7	<b>land</b> 59:4 <b>larger</b> 35:3	<b>led</b> 60:23 <b>Leeper</b> 2:9 3:13	<b>License</b> 97:23 <b>life</b> 4:25 5:6,12
67:19 68:1	71:8,14,24 72:2,9,11,12	<b>late</b> 53:1 <b>lately</b> 84:16	4:9,10 11:7,19 23:17 37:11	28:1,24 29:1 49:2 54:11
69:8,19 74:7	72:13 73:2,5,6 73:12 74:10,15	<b>Lake</b> 54:14 59:15	40:16 41:22,23 44:21,25 45:2	<b>light</b> 45:25 <b>likeable</b> 30:17
87:17 88:24	74:23 75:1,7 75:10,15 77:22	<b>land</b> 59:4 <b>larger</b> 35:3	46:16 57:1,3 60:9 61:9,23	<b>line</b> 4:19 6:19 56:25 89:22
92:25 93:12		<b>land</b> 59:4 <b>larger</b> 35:3	67:18 70:19 75:20 76:2,4	98:5
95:2,25		<b>land</b> 59:4 <b>larger</b> 35:3		
<b>kinds</b> 96:1		<b>land</b> 59:4 <b>larger</b> 35:3		
<b>King</b> 97:3		<b>land</b> 59:4 <b>larger</b> 35:3		
<b>knew</b> 20:25 38:3		<b>land</b> 59:4 <b>larger</b> 35:3		
<b>know</b> 4:17 5:4 5:15 9:5 10:2		<b>land</b> 59:4 <b>larger</b> 35:3		
14:6 16:6,7,8		<b>land</b> 59:4 <b>larger</b> 35:3		
17:4,8,12,22		<b>land</b> 59:4 <b>larger</b> 35:3		
18:1,5,25		<b>land</b> 59:4 <b>larger</b> 35:3		
19:16,24 20:8		<b>land</b> 59:4 <b>larger</b> 35:3		
20:15,19,22,22		<b>land</b> 59:4 <b>larger</b> 35:3		
21:8,10,14		<b>land</b> 59:4 <b>larger</b> 35:3		
22:2,9,18 24:1		<b>land</b> 59:4 <b>larger</b> 35:3		

<b>lines</b> 24:5 34:14 63:14,15,25	<b>looks</b> 84:15,19	<b>Martinez</b> 26:2	<b>Mel</b> 7:15,16 8:9 9:14 11:10,20 18:23 22:20 23:17 31:13 32:8,10 41:18 44:5 46:8,8 48:1 70:14,18 76:4 80:13 81:18 85:20 86:22 88:13,21 91:5,9 92:7,11 92:20 94:5,7 95:20,22 96:10	<b>Mexicans</b> 60:11
<b>list</b> 43:8 56:15	<b>loop</b> 29:13	<b>masks</b> 49:21	<b>member</b> 65:13	<b>Mexico</b> 34:9 38:12 44:10,16 48:9
<b>listed</b> 98:4	<b>Lopez</b> 43:13	<b>matter</b> 90:17	<b>members</b> 11:3 61:5,19	<b>Michoacán</b> 18:21 19:2
<b>Litigation</b> 3:5	<b>Los</b> 2:19	<b>matters</b> 75:4	<b>memory</b> 8:15,18 78:7,11	<b>Microsoft</b> 15:21
<b>little</b> 5:12 6:13 6:17 7:9 9:16 24:20 29:13 32:8 48:1 65:23 69:10 92:25 95:5	<b>lost</b> 75:23	<b>mayor</b> 19:7	<b>mention</b> 72:5	<b>middle</b> 7:10 15:19
<b>live</b> 33:24 34:1 48:7 53:20 57:23 60:14 70:22 86:16 93:7	<b>lot</b> 15:6 33:8 49:19 53:2 58:23,24 68:13	<b>mean</b> 12:24 17:10,19 23:9 28:8,21 31:23 32:4 33:6 34:21 37:3 39:13,13 47:24 53:19 54:11,11 54:24 55:10 57:23 59:5 60:19 61:11,12 62:9,11 64:8 64:23 65:21 66:15 67:20 68:1 69:10,19 72:20,20 73:22 79:12,25 83:7 83:12,19,20 84:15 86:6 88:1 89:16 90:25 91:15 93:20	<b>mentioned</b> 19:10 22:25 30:9,12 31:20 34:1 41:7,8 51:19 53:3,9 53:20 58:25 63:5,11 70:22 71:16 72:6 78:20 82:15 89:2 93:4,24 94:18	<b>midpoint</b> 47:3
<b>lived</b> 21:11 29:4 31:16 48:11 53:23,25 54:9 54:12,19 59:19 59:20 71:12,14 93:3,4	<b>loud</b> 5:19	<b>meeting</b> 10:8,14 10:16,18 14:21 15:3 16:9 19:20 20:6 58:12 65:25	<b>Messenger</b> 83:3 83:6	<b>migrate</b> 49:16
<b>lives</b> 93:21	<b>lower</b> 56:21	<b>means</b> 8:21 67:14	<b>met</b> 18:6,8,11 20:9	<b>migrant</b> 60:19
<b>Lizette</b> 43:19	<b>LpL</b> 50:23 51:16 51:17	<b>meant</b> 87:22,23	<b>Mexican</b> 2:17 7:24 19:13 33:6,12,13 62:10 64:7 69:14,14 94:8	<b>million</b> 55:19
<b>LLC</b> 2:4	<b>luncheons</b> 21:15	<b>media</b> 66:6 74:14 94:19		<b>mind</b> 6:1 9:8 33:2
<b>loading</b> 24:14	<b>M</b>	<b>medications</b> 8:14		<b>mint</b> 63:16
<b>local</b> 31:1 52:24 53:10	<b>M 1:22</b> 4:8 92:23 97:22 98:23	<b>meet</b> 9:17 10:3		<b>minutes</b> 10:15 16:17
<b>long</b> 6:11 10:14 16:15 25:15 29:10 49:24 50:4 53:23,25 55:23 56:15 68:3,13 72:20 82:12	<b>M-O-R-E-L-I-A</b> 18:21	<b>meeting</b> 10:8,14 10:16,18 14:21 15:3 16:9 19:20 20:6 58:12 65:25		<b>mirror</b> 27:20 28:23
<b>longer</b> 25:18	<b>ma'am</b> 5:3 11:12	<b>meetings</b> 9:23 18:8,9 19:25 20:1,5,7 21:13 21:16 42:22,23 58:11 71:9		<b>mirrors</b> 28:10
<b>look</b> 76:4,8,10 76:19 79:4 82:22 85:19 87:13 89:12	<b>Mabton</b> 58:5,6			<b>missing</b> 91:21
<b>looked</b> 34:6 79:3 82:5 88:2	<b>Mac</b> 15:10			<b>mission</b> 22:15 65:15
<b>looking</b> 26:14 28:16 61:16 87:14,15 95:7	<b>Macias</b> 43:11			<b>Mississippi</b> 47:1
	<b>mails</b> 83:22,25			<b>mix</b> 39:19 55:12
	<b>main</b> 2:5 27:24 28:6,9			<b>mom</b> 33:9
	<b>majority</b> 65:3 73:3,24			<b>moment</b> 75:21 85:12
	<b>making</b> 9:25 64:5			<b>momentum</b> 5:25
	<b>MALDEF</b> 2:15 2:18			<b>money</b> 35:23 36:7,10,13 48:23
	<b>manager</b> 17:10			<b>Monitoring</b> 49:11
	<b>manages</b> 17:15			<b>month</b> 90:23,25
	<b>manner</b> 97:10			<b>months</b> 51:7,8 82:13 92:3
	<b>map</b> 23:8,21,24			<b>Morelia</b> 18:17 18:21 19:2,3,5 20:7 22:11,17
	<b>March/April</b> 44:14			<b>Morfin</b> 2:21,22 2:22 43:21,24
	<b>marking</b> 86:20			<b>morning</b> 4:10 63:14
	<b>marriage</b> 28:1 28:24			

<p><b>mornings</b> 64:1  <b>Moses</b> 54:14                  59:15  <b>motions</b> 97:17  <b>move</b> 41:22  <b>moved</b> 51:17                  54:2 61:4  <b>movement</b> 70:7  <b>moving</b> 34:7                  94:5  <b>MULJI</b> 2:10  <b>mumbled</b> 26:20</p> <hr/> <p style="text-align: center;"><b>N</b></p> <p><b>N</b> 2:1 4:8,8                  92:23,23  <b>name</b> 4:10 7:6                  10:9 26:3,4                  33:18 39:17,23                  41:25 42:17                  43:22,23 45:6                  52:6,9,12  <b>named</b> 11:10                  40:4 42:6 97:6  <b>names</b> 25:25                  43:7 45:12                  46:1 71:22  <b>national</b> 53:10                  65:15  <b>near</b> 58:17  <b>necessarily</b> 28:8                  28:25 47:11                  52:24 61:10                  62:7 63:2 65:6                  75:14,18 87:11  <b>necessary</b> 60:25                  90:21 91:17  <b>need</b> 5:14 8:22                  28:21 51:11                  54:20  <b>needed</b> 36:7  <b>needing</b> 6:11  <b>needs</b> 27:10  <b>negative</b> 64:5  <b>neighbors</b> 95:25</p>	<p><b>neither</b> 33:21  <b>never</b> 12:15                  16:13 30:19                  31:12,24 38:25                  55:3 70:13                  74:3 78:17  <b>new</b> 73:17  <b>Newhouse</b> 53:6  <b>Nicki</b> 21:8,18,22                  38:17,20,22                  39:10,16  <b>nod</b> 5:15 29:11  <b>Nodded</b> 73:13  <b>non</b> 62:18  <b>non-Hispanic</b>                  95:14  <b>non-interest</b>                  66:7  <b>non-Latinos</b>                  64:10  <b>non-white</b> 58:18  <b>Nope</b> 9:13,20                  10:22 11:4                  13:24 14:2                  16:25 20:11  <b>normal</b> 28:1                  87:16  <b>Northwest</b> 2:11                  50:7  <b>note</b> 14:22  <b>noted</b> 6:25 97:11  <b>notes</b> 10:18  <b>notice</b> 6:17                  86:12  <b>noticeable</b> 65:19  <b>November</b> 30:4                  32:22  <b>nuclear</b> 49:19                  51:3  <b>number</b> 4:19                  40:25  <b>numbered</b> 86:10</p> <hr/> <p style="text-align: center;"><b>O</b></p> <p><b>O</b> 4:8 92:23</p>	<p><b>oath</b> 4:5 8:9,20  <b>oaths</b> 97:5  <b>object</b> 6:24                  80:11 95:20                  96:3  <b>objection</b> 6:25                  11:5,16 23:15                  37:8 41:16                  56:24 60:6                  61:8,22 67:16                  70:17,18 85:2  <b>objections</b> 40:10                  97:9,17  <b>obviously</b> 5:13  <b>occasion</b> 19:10  <b>occurs</b> 70:11  <b>October</b> 1:20                  4:1 97:20                  98:22  <b>offered</b> 3:18  <b>office</b> 17:15                  22:24 24:25                  27:13,16 29:17                  29:19,20 30:7                  30:9,13,15,15                  30:22,24,25                  31:1,5,22 32:3                  32:5 36:20                  37:2,7 52:21                  53:15,18 71:18                  95:8  <b>offices</b> 17:15                  26:9 27:11                  30:24 31:3  <b>official</b> 1:9                  25:13,14 52:10  <b>officials</b> 71:17  <b>oh</b> 7:24 11:12                  12:25 17:15,23                  18:7 20:14                  21:19 22:12,14                  24:1 25:12,16                  26:2 30:3                  31:23 32:7                  33:20 35:5,20</p>	<p>37:10,21 38:11                  40:8,11 41:21                  45:18 46:6,12                  47:20 48:18                  50:5 52:11,23                  53:5,24 54:2                  54:15 55:14                  56:8 58:21                  59:10 60:14                  63:9,20,22                  65:12,14 66:6                  68:24 69:13,24                  70:16 71:11,13                  73:5 79:21                  81:7,13 82:12                  85:24 86:2                  94:23 96:7  <b>okay</b> 5:4 6:3,10                  6:14,22 7:5,12                  7:16,24 8:20                  9:11,16 10:3,7                  10:14 12:2,17                  12:21 13:1,6                  13:15,22 14:10                  14:16,22 15:1                  15:5,7,25 16:9                  16:13,18 19:20                  20:9,23 21:1,8                  22:5,12,20                  23:6,12 24:7                  24:18 25:6,19                  28:13 29:4,8                  29:10,13 31:13                  31:14,20 32:13                  33:15,24 34:14                  34:23 36:19                  37:11 38:8                  39:21 40:15,21                  40:24 41:2,6                  41:11,14,21                  42:6,9,14,21                  42:25 43:5                  44:5,15,18,25                  45:2,7,10,15                  45:21,24 46:15</p>	<p>47:5,8,18,21                  47:25 48:15,20                  50:14,17,21,25                  51:19,24 52:3                  52:19 53:3,8                  53:14,20,25                  54:9,21 55:8                  55:25 56:5,12                  57:19,21,25                  58:9 59:10,13                  59:14,17,24                  60:8 61:5,10                  63:4,11,18                  64:3,11,25                  65:9,23 66:20                  67:17,22 68:1                  69:21 70:3,9                  70:22 71:16                  72:21 73:2,5                  73:20,25 74:16                  74:18,22 75:20                  76:2,4,15,16                  76:17,25 77:13                  77:25 78:19,21                  78:22 79:7,15                  80:14,17,18,24                  81:3,7,14,18                  81:21,25 82:9                  82:14,21,23                  83:5,22 84:7                  84:14,25 85:4                  85:16 86:7,15                  86:18,21,22                  87:2,19,24                  88:8,13,14,15                  88:18,22 89:24                  89:25 90:11                  91:3 92:21                  93:23 94:5,23                  95:5,22 96:7,9                  96:12  <b>old</b> 17:17 71:24  <b>Olympia</b> 38:15  <b>once</b> 90:23,25  <b>online</b> 64:6</p>
--	---	---	---	--



<p><b>open</b> 14:22 15:18 36:22 76:21 80:20 86:7 <b>opinion</b> 13:13 37:22 67:8 <b>opportunity</b> 22:18 86:23 97:8 <b>Ops</b> 17:10 <b>ORAL</b> 1:17 <b>organization</b> 18:15 19:3 20:8 22:19 44:1 50:15 65:13 <b>oriented</b> 28:10 <b>originally</b> 29:15 <b>origins</b> 24:22 <b>Othello</b> 26:6 59:5 <b>out-of-pocket</b> 35:22 37:4 <b>outcome</b> 97:13 <b>outgoing</b> 30:18 <b>outside</b> 12:22 17:18 30:21 37:17 51:23 59:22 89:11 <b>overall</b> 95:1,2 <b>overarching</b> 66:2 <b>overexpose</b> 49:12 <b>overlap</b> 5:10 <b>overqualified</b> 32:11 <b>overweight</b> 24:13 <b>owner</b> 63:11</p> <hr/> <p style="text-align: center;"><b>P</b></p> <hr/> <p><b>P</b> 2:1,1 <b>p.m</b> 1:20 88:17 96:16</p>	<p><b>pad</b> 81:6 <b>Padilla</b> 43:15 <b>page</b> 2:25 3:12 55:8,23 98:5 <b>paid</b> 49:7 <b>Palmer</b> 1:6 2:7 43:9 45:16 98:20 <b>paper</b> 45:13 <b>papers</b> 15:5 <b>paperwork</b> 45:13 89:19 <b>park</b> 65:18,18 <b>parking</b> 53:2 <b>Parra</b> 43:19 <b>part</b> 8:20 18:13 18:14,14 23:2 51:21 74:9 77:20,23 78:19 78:21 79:2 81:17,19 86:24 89:15,23 93:9 93:17,25 <b>particular</b> 7:13 26:8 27:17 31:3 32:5 34:24 70:1,25 71:2,15 <b>parties</b> 75:6 97:9,12 <b>partisan</b> 34:24 35:14 73:15,21 <b>partner</b> 51:18 <b>parts</b> 12:23 23:23 93:4 <b>party</b> 9:14 11:3 20:2 25:7,8,11 27:19 28:10 35:12 65:20 66:10,13,13,18 66:19 75:1,3 97:11 <b>Pasco</b> 21:11 31:17 54:2 55:11 56:10</p>	<p>57:4,5 59:20 71:13 93:16 <b>passers</b> 66:16 <b>passersby</b> 66:8 <b>pattern</b> 64:21 <b>patterns</b> 64:12 64:14,17 65:7 66:22 67:1 <b>Paul</b> 11:11 12:10,21 16:19 19:9,10 70:13 78:13,13,24 79:4 89:3,18 91:1,19 <b>pay</b> 35:24 74:14 85:7 <b>paying</b> 84:25 85:5,13 <b>pays</b> 45:22 <b>pending</b> 6:16 <b>people</b> 17:19 19:7,12 36:24 37:2,5 44:2 49:11,13 58:12 60:18 61:2 62:9 64:10 71:17 75:17 78:15 87:4 <b>percent</b> 56:3,5 56:13 57:5,6 57:10 58:2,16 58:22 <b>percentage</b> 56:9 64:22 <b>perfectly</b> 29:11 <b>period</b> 92:4,8 <b>person</b> 9:18 10:10 31:10 45:22 64:6 <b>personal</b> 18:11 33:10 36:3 43:1 65:21 72:22,23,25 79:19 <b>personally</b> 42:18</p>	<p>64:3 <b>PHILLIPS</b> 2:10 <b>phone</b> 4:13 9:18 14:24 40:25 52:2,18 53:7,7 53:12 76:24 78:23 82:24 <b>phrase</b> 60:11 75:2 <b>phrases</b> 68:14 <b>Physics</b> 49:8 <b>picking</b> 63:23 <b>pictures</b> 19:18 <b>pieces</b> 89:2 <b>place</b> 53:6 <b>placed</b> 34:16 <b>places</b> 54:19 <b>plaintiffs</b> 1:7 2:7 2:15,21 4:12 4:20 14:7 43:6 <b>Plaintiffs'</b> 77:14 <b>plants</b> 49:19 <b>platform</b> 40:13 82:23 <b>platforms</b> 83:2 <b>pleasantly</b> 39:12 <b>please</b> 7:5 13:11 15:14 25:22 72:10 <b>PLLC</b> 2:22 <b>plugged</b> 76:24 <b>pocket</b> 36:12 85:8 <b>pockets</b> 36:10 <b>point</b> 6:3,11 13:17 34:15 73:9 <b>polarized</b> 67:13 <b>polarizing</b> 67:20 <b>police</b> 29:12 <b>policies</b> 69:17 75:1 <b>political</b> 11:3 12:14,23 21:22 26:8 27:3 39:5</p>	<p>39:6 51:24 53:10 <b>politicians</b> 18:9 <b>politics</b> 12:15,25 13:3,6 <b>polls</b> 67:8 <b>popped</b> 65:13 <b>popular</b> 71:12 <b>population</b> 23:11 56:3,18 57:4,25 58:19 58:20 59:2,8 59:25 60:2,13 60:24 69:25 70:7 73:4,19 <b>portion</b> 27:6 38:13 <b>position</b> 23:5 24:9,11,15 25:3 49:10 53:5 63:1 72:14 88:5 89:21 <b>positions</b> 26:11 <b>possession</b> 78:1 <b>possibility</b> 34:6 87:12 <b>possible</b> 25:4 <b>possibly</b> 22:24 <b>post-attende</b> 15:15,18 <b>posters</b> 53:11 <b>potential</b> 35:13 35:14 44:15 <b>potentially</b> 87:9 <b>power</b> 22:18 <b>powers</b> 24:1 <b>Prayed</b> 16:12 <b>pre</b> 42:24 <b>precisely</b> 88:24 <b>prefer</b> 7:13 33:9 67:23 68:6 74:24 75:10 94:7 <b>preferences</b></p>
--	---	--	--	---

<p>68:16  <b>prefers</b> 33:9  <b>prejudice</b> 62:5,7          62:12  <b>Prentis</b> 50:17  <b>preparation</b>          14:3 16:2          97:18  <b>prepare</b> 9:19,23          10:4 14:1          16:10  <b>prepared</b> 9:17          97:18  <b>preparing</b> 16:16  <b>prepositional</b>          68:14  <b>present</b> 6:23          10:8 47:19  <b>president</b> 21:11          35:7 53:12  <b>presumption</b>          94:19  <b>pretty</b> 19:14          28:23 30:18,23          33:7 36:22          42:16 48:9          51:20 52:25          56:15 57:6          58:6,10,15          59:6,19 60:17          62:4 65:19          66:15 71:6,11          71:24 89:18,20          91:9 92:1          93:22  <b>prevalent</b> 60:17  <b>previous</b> 9:3,6          42:21 51:3  <b>prior</b> 39:21 92:3  <b>privilege</b> 41:17          46:14 80:12  <b>pro</b> 28:1,1,23,24  <b>probably</b> 13:15          25:17 27:1          30:4 32:10</p>	<p>37:15 38:6          52:23 55:2          56:20 58:2,15          59:6 60:15          63:20,22 66:18          69:19 75:16          78:20 79:18          81:19,23 82:19          83:19,20 88:7          90:18 91:1          94:2  <b>problem</b> 15:20          40:16  <b>procedure-wise</b>          76:5  <b>Proceedings</b> 4:1          4:2  <b>process</b> 5:1          11:15,25 12:7          12:10 16:20          17:2 41:4          47:13 69:22          70:3,10 85:25          86:24  <b>producing</b> 80:14  <b>Production</b>          77:15 81:22          91:11,24 92:3  <b>productive</b>          51:12  <b>professionally</b>          21:15  <b>profile</b> 62:9  <b>profiling</b> 62:8          62:14  <b>program</b> 19:22          22:6,10,11  <b>programs</b> 49:6  <b>prominent</b> 27:2  <b>promise</b> 5:24  <b>proper</b> 56:21  <b>properties</b> 61:2          61:4  <b>protective</b> 49:22          50:2</p>	<p><b>proud</b> 33:11  <b>provide</b> 8:22          80:6 86:3  <b>provided</b> 26:1          80:10  <b>providing</b> 84:21  <b>public</b> 73:25          74:11  <b>purposes</b> 15:7          40:8,9 41:24          54:22 55:9  <b>pursuant</b> 97:4          97:18  <b>put</b> 17:18 36:10          54:21  <b>putting</b> 74:22          75:9</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <p><b>qualifications</b>          97:10  <b>quantity</b> 35:3  <b>question</b> 5:8,17          6:4,5,7,16 7:1          9:4 11:21,23          23:20,22 26:20          41:19,23 57:14          65:23 66:2,4          68:1,10,11,20          73:23 77:8          80:13 84:17          95:10  <b>questioning</b>          6:19 56:25  <b>questions</b> 6:2,24          8:12,23 13:15          13:17 22:20          23:6 44:18          45:4 54:22          63:4 84:13,20          84:22 86:3,5          88:20 91:5,6          92:10,21,25          95:5 97:16  <b>quick</b> 44:19</p>	<p>75:21 87:2  <b>quickly</b> 95:20  <b>Quincy</b> 42:8,12  <b>quite</b> 58:25 68:9          68:24 72:3  <b>quote</b> 35:7 54:7</p> <hr/> <p style="text-align: center;"><b>R</b></p> <p><b>R</b> 2:1,4 97:1  <b>R.W</b> 3:3  <b>race</b> 7:19,21,23          7:24 33:3,5,6          61:15,16 62:3          63:2 66:22          67:1,5 74:22          75:9,14,18  <b>race-based</b> 63:6  <b>races</b> 66:23 67:2          67:20,24 68:7          68:18 69:2          75:17  <b>racial</b> 24:16          46:4,21,25          73:18  <b>racially</b> 23:2,8,9          23:22,24 67:13          72:19  <b>radiation</b> 49:11          49:25  <b>radioactive</b> 51:4  <b>radiological</b>          49:15  <b>rah-rahing</b> 53:2  <b>raise</b> 35:24 36:1          36:9  <b>raised</b> 48:14          54:11  <b>raising</b> 36:5,13  <b>ramifications</b>          49:18  <b>ran</b> 38:24 48:23  <b>ranch</b> 34:9 36:4          38:11 44:10,16          63:13 64:2  <b>rate</b> 7:22</p>	<p><b>Raul</b> 26:4 33:18  <b>RBC</b> 51:14  <b>RCW</b> 97:4  <b>RDR</b> 1:22 97:22          98:23  <b>read</b> 42:13          60:16 98:2  <b>reading</b> 16:17  <b>ready</b> 88:18  <b>Reagan</b> 35:7  <b>really</b> 19:13          33:23 38:25          54:25 55:3          70:12 74:9          75:4 95:19  <b>reason</b> 8:11,13          9:11 44:7 66:9          98:5  <b>reasons</b> 34:4          87:18  <b>recall</b> 21:3 36:16          40:24 41:12,12          42:25 52:13,21          85:7  <b>recalled</b> 12:15  <b>receive</b> 14:16  <b>received</b> 83:23          83:25  <b>receiving</b> 85:25  <b>receptive</b> 30:20          31:12  <b>record</b> 4:3 5:7          5:11,17,19 7:1          7:6,19 41:24          44:21,23 45:1          45:2 75:21,22          76:3 88:10,19          91:8,12 92:1          96:13 97:9  <b>redistrict</b> 70:1  <b>redistricting</b>          10:24 11:14,25          12:10,16,22          13:2,14,19          16:20 17:2,5,7</p>
--	--	--	--	---

17:22 20:17	<b>religious</b> 29:5	27:16 31:18	<b>responded</b> 89:8	96:13
21:18 22:25	<b>remember</b> 9:2	<b>represents</b> 4:14	<b>responding</b>	<b>Rights</b> 47:6
23:1,7,13 24:3	10:9 18:7	4:16 31:15	86:25	70:15
37:17 38:5	25:25 26:5	<b>Republican</b>	<b>response</b> 77:12	<b>rings</b> 36:17
44:3 69:23	33:19,22,23	11:14,24 16:20	95:6	<b>Rio</b> 7:18
70:4,10 74:2,5	36:15 40:7,22	17:6 20:2 22:3	<b>responses</b> 5:14	<b>river</b> 54:6
74:12 78:4	41:1,5 47:23	23:4 24:8 25:7	87:1	<b>Rod</b> 52:13
83:18,23 92:5	47:24 52:9,12	25:11 27:19	<b>responsive</b> 78:2	<b>role</b> 27:18
<b>redrawn</b> 23:2,8	52:20,23,24	28:10 34:20	82:1 88:25	<b>room</b> 15:8 17:18
23:9,10,11,24	53:11,19 54:2	35:4,8 38:25	91:10	<b>Royal</b> 50:20,22
34:14 72:19	54:18 56:11	39:4,12 42:22	<b>restroom</b> 6:12	51:14
73:6,18	59:10 62:21	42:23 65:15	<b>results</b> 65:1	<b>rude</b> 40:9,12
<b>redrew</b> 24:2	63:9,10,22	66:1,9,12,18	<b>retired</b> 20:22,25	<b>rules</b> 4:23
<b>reduced</b> 97:7	70:21 77:18	94:13 95:2,3	21:2,6,7 50:11	<b>run</b> 31:13 32:6
<b>Reed</b> 51:16,16	82:7 84:19,21	95:14	51:8	32:21 34:4
<b>refer</b> 8:5 41:2,8	84:23 85:23	<b>Republicans</b>	<b>retiring</b> 20:19	38:8,9,10,24
<b>reference</b> 26:11	86:1,25 87:23	12:25 13:4,19	20:22,24 51:2	39:17 53:15
<b>referred</b> 66:3	88:4 93:5	35:6 64:20	<b>returns</b> 66:21,25	72:13 87:17
<b>referring</b> 8:5	<b>remembered</b>	65:2,4 94:16	<b>reverse</b> 64:21	<b>running</b> 13:12
23:25 73:10	12:15	<b>request</b> 18:16	<b>review</b> 10:16	22:24 24:25
<b>refresher</b> 70:16	<b>Remote</b> 1:17 4:1	79:1 81:22	14:3 76:25	29:17,19,22
70:20	<b>repeat</b> 68:1,1	88:2,3 96:6	84:14 85:20	30:7,8,12,14
<b>regarding</b> 17:1	96:6	<b>requested</b> 82:7	86:23 97:8	30:15,22,23
83:23	<b>rephrase</b> 6:4	<b>requesting</b>	<b>reviewed</b> 14:14	31:2,5,22 32:2
<b>region</b> 54:23	68:13	78:16	16:3,5 66:21	32:9,16 34:20
55:11	<b>Reported</b> 1:22	<b>requests</b> 77:15	66:25 67:4	35:18,19 36:20
<b>Registered</b> 1:23	98:23	78:2 82:1	84:16	37:2,7 38:18
97:22	<b>reporter</b> 1:23	85:21 87:16	<b>reviewing</b> 96:15	39:10 52:15,22
<b>regular</b> 63:16	18:16,22 75:23	89:1 91:10,11	<b>rich</b> 65:20 66:10	53:4,18 72:11
66:6	96:6 97:4,22	91:23 92:3	66:13	72:12 73:1
<b>reiterate</b> 5:8	<b>reporting</b> 1:22	<b>require</b> 92:5	<b>Richland</b> 31:17	74:23 87:5,5,8
<b>related</b> 16:23	74:14 98:23	<b>required</b> 60:21	93:17	87:9,18 88:5
17:4 20:12	<b>represent</b> 77:13	<b>Reservation</b>	<b>ricos</b> 62:23	<b>runs</b> 17:13
21:17 41:14	<b>representation</b>	48:4,6 58:17	<b>Ridley</b> 84:5	
83:18 84:17	27:8,9,10,12	58:18 93:23	<b>right</b> 7:5,25 9:7	<hr/> <b>S</b> <hr/>
<b>relates</b> 17:21	85:1,14 95:9	94:1,2	11:15 13:16	<b>S</b> 2:1 3:17
<b>relating</b> 77:7	<b>representative</b>	<b>reserved</b> 96:17	14:23 15:2,24	<b>Safeway</b> 53:2
<b>relationship</b>	1:14 32:10	<b>resident</b> 42:12	23:1 24:6,14	<b>satisfaction</b>
69:14 93:20	42:8,11	<b>residents</b> 8:5,6	34:6 36:23	79:19
<b>relative</b> 97:11	<b>representatives</b>	<b>Residing</b> 97:24	39:1 47:6,25	<b>Saul</b> 26:2
97:12	11:3 18:8 52:7	<b>respect</b> 91:18	57:13 59:7	<b>savvy</b> 78:10 83:4
<b>relevant</b> 78:23	<b>represented</b>	<b>respectful</b> 94:7	70:23 76:18	<b>saw</b> 24:4 86:1
79:8,11 81:17	31:15	<b>respecting</b> 40:13	83:1 84:12	<b>saying</b> 64:25
82:16 88:6	<b>representing</b>	<b>respirators</b>	85:22 87:7	65:20 66:12,14
89:5,8	4:11,20 20:8	49:23	88:7 89:9 90:2	88:1

<b>says</b> 15:18 32:7 80:25	81:11,15 82:22 84:10 88:15	<b>Sharon</b> 31:6,6,9 31:14,21 71:5 72:2,6,7	<b>sorry</b> 5:22 8:1 11:19,21,21 13:11,14 17:19 17:20 23:18,20 25:20 29:9 31:2 33:25 40:15,17 47:7 48:19,24 52:9 52:12,17 54:18 55:17 60:8 68:11 70:18 77:6 85:12 86:18 94:22,23 95:19 96:5	62:15 64:15,18 67:2,9,25 68:8 68:18 69:2 <b>Southeast</b> 55:5 93:5 <b>southeastern</b> 55:1,14 <b>Spanish</b> 18:20 <b>speak</b> 17:1 50:19 66:10 69:16 <b>speaking</b> 4:15 4:21 <b>specific</b> 30:21 36:15 45:4 46:17 <b>specifically</b> 17:21 24:21 26:14 27:13 32:16 64:15 67:2 68:15,16 68:25 87:14 <b>specifics</b> 32:7 42:13 <b>speculation</b> 37:9 <b>spell</b> 7:6 18:18 <b>spend</b> 36:3 38:14 <b>spending</b> 34:10 38:12 <b>spent</b> 16:15 <b>Spokane</b> 52:25 <b>spoke</b> 12:21 13:22 24:24 <b>spoken</b> 26:7,13 30:6 31:21 32:2 35:17 53:17 <b>Spring</b> 2:18 <b>sprung</b> 60:15 <b>SS</b> 97:2 <b>staff</b> 11:1 <b>staffer</b> 16:19 <b>standard</b> 82:24 83:10
<b>scene</b> 27:3	<b>seeing</b> 85:23	<b>she'd</b> 21:14		
<b>scheduled</b> 44:6	<b>seeking</b> 26:8,25	<b>she'll</b> 39:14		
<b>school</b> 48:3,4 50:8 62:20,21 62:24,25 63:6 63:14,15,23,25 64:1,4 93:24	<b>seen</b> 77:9 81:18 84:17	<b>shed</b> 45:25		
<b>schooling</b> 49:7	<b>selected</b> 77:23	<b>SHEET</b> 98:1		
<b>screen</b> 14:20 15:11,24 76:8 76:11 80:24 81:8,11 86:12	<b>self-employed</b> 50:13	<b>shifted</b> 60:5,10		
<b>scroll</b> 76:18,22 81:15,16 84:12 90:1,4,13	<b>Senate</b> 11:13,24	<b>Shirley</b> 71:11,19 71:21		
<b>scrolled</b> 88:7 90:25	<b>senator</b> 18:6 19:21 20:4,9 20:19 21:6 29:20 31:6,9 31:14 32:9 71:5 72:4,12 72:15	<b>shop</b> 18:7		
<b>scrolling</b> 79:6	<b>senators</b> 17:13 17:16 20:1	<b>shortly</b> 88:16		
<b>search</b> 78:5,6,8 78:9,22 79:10 79:16 80:6,7 82:4 88:25 90:1,4,14 91:9 91:10,13,16,19 92:1,6	<b>send</b> 12:12 80:19 89:19	<b>shut</b> 49:19		
<b>searched</b> 89:16 89:25	<b>sense</b> 6:8,20 7:3 57:16,17,20,21 59:12 60:23 62:1 69:13 76:20 94:25 95:23	<b>side</b> 16:13 17:6 39:12 54:6 59:4 64:21		
<b>searches</b> 77:25 80:3 81:25	<b>sent</b> 14:5,24 16:6 45:14 77:24 78:12,15 78:18 80:21 81:4,20	<b>sign</b> 97:8		
<b>seats</b> 67:6	<b>separate</b> 45:16 46:2 93:22	<b>Signal</b> 83:3		
<b>Seattle</b> 3:6 97:24	<b>session</b> 34:11 38:13,16	<b>Signature</b> 96:17 98:18		
<b>second</b> 53:13 81:10 87:3	<b>set</b> 77:14 95:5 97:19	<b>significant</b> 27:6		
<b>Secretary</b> 1:9 4:15	<b>setting</b> 75:3	<b>signing</b> 97:9		
<b>Section</b> 47:6	<b>shadow</b> 31:11	<b>silly</b> 40:18		
<b>see</b> 15:10 17:19 23:21 37:1 63:3 65:1 74:16 76:11,15 76:16 77:7,14 77:17 80:20,22 80:24 81:4,5,6	<b>shake</b> 5:16	<b>Simone</b> 2:9 4:10 7:16 40:14 56:23 86:9 91:15 93:2 95:6		
	<b>share</b> 27:22 81:8 82:14 91:14,21	<b>single</b> 54:13 93:12		
	<b>shared</b> 86:12	<b>sister</b> 18:15,17 19:22 20:7 22:6,11,16 58:11 93:21		
	<b>sharing</b> 76:8	<b>sit</b> 75:6		
		<b>situations</b> 18:10		
		<b>six</b> 25:17,17 51:7 51:8 86:11		
		<b>Sixty</b> 57:6		
		<b>SLeeper@Ca...</b> 2:12		
		<b>Smith</b> 3:4 4:14		
		<b>societies</b> 51:21		
		<b>Society</b> 17:16		
		<b>sold</b> 61:2,3		
			<b>sort</b> 4:12 12:17 13:1,19 15:8 15:18 17:24 18:24 19:21,21 22:7 23:7 24:7 24:19,22 26:13 28:2,13,14,18 29:4 32:13 34:18 35:3 36:6,13 39:16 39:18 40:10 42:25 45:4,25 46:19 47:5 50:15 51:2 54:21 55:18 63:5,6,18 64:4 64:5 65:24 72:22 91:7	
			<b>sorts</b> 26:18	
			<b>Soto</b> 1:6 2:7 43:9 45:16 98:20	
			<b>sound</b> 43:22	
			<b>sounds</b> 18:19 52:10 91:15,16 91:18	
			<b>South</b> 2:18	
			<b>Southcentral</b> 44:2 54:10,24 55:2,4,6,10,24 56:1 59:25 60:5 61:7,21	

<b>standing</b> 56:24	<b>strong</b> 93:20	91:21,22	59:3 75:5,6	15:25 18:22
<b>start</b> 20:4 50:21 57:19	<b>stronger</b> 94:3	<b>surprised</b> 38:23	79:22 82:4	51:1 66:20
<b>started</b> 12:7 30:3 50:6,7 51:5,13 79:22 90:8	<b>studied</b> 67:8	39:10,11,13	85:12 90:13	69:21 76:2
<b>state</b> 1:9,10,14 3:2 4:15,17 7:6 17:2 25:7 50:2 53:10 64:12 66:22 67:1,6 67:11,24 68:7 68:17 69:2 70:4,4 92:10 92:13,15 97:2 97:5	<b>study</b> 48:20	<b>survey</b> 49:13,21 49:22 50:1,1	95:7	86:19 91:5
<b>STATES</b> 1:4	<b>stuff</b> 13:5 14:8 15:6 17:14,17 21:16 31:8 32:12,20 36:24 58:12 62:25 63:6 65:18 71:10 79:22 81:23 87:18	<b>surveys</b> 28:15 28:21,25	<b>teachers</b> 63:7	92:11,13,16,19 96:11
<b>statistical</b> 67:4	<b>submit</b> 74:4,7	<b>Susan</b> 1:6 43:9	<b>tech</b> 78:10 83:4	<b>thanks</b> 5:4 7:16 18:23 40:14 57:2 75:3 86:21 92:15 94:5 96:10
<b>stay</b> 49:24 51:12 51:12	<b>subparts</b> 12:17 93:1	<b>Swan</b> 48:4,11 93:24	<b>technical</b> 49:4 75:23	<b>thereof</b> 97:13
<b>stays</b> 49:15	<b>subset</b> 94:9	<b>swat</b> 5:24	<b>tell</b> 4:5 8:21 39:16,18 40:25 44:13 57:15,16 69:10,22	<b>they'd</b> 62:24
<b>stenographica...</b> 97:6	<b>suggest</b> 33:15	<b>switch</b> 87:2	<b>ten</b> 54:7 69:24	<b>thing</b> 6:22 16:8 22:3 33:10 49:25 62:20 65:21 70:6 81:8,14 87:17 90:8
<b>step-off</b> 49:14	<b>suggested</b> 31:9 32:21 33:17,20	<b>switched</b> 50:22	<b>tend</b> 36:14 64:20 65:2 66:3 69:1 74:24 75:10 94:19	<b>things</b> 5:5,16 15:10 24:19 36:14 38:5 51:4 88:23
<b>stereotyping</b> 64:5	<b>Suite</b> 2:5,11,23 3:6	<b>switching</b> 95:3	<b>term</b> 55:9,13 67:13,20 73:12	<b>think</b> 10:13 12:23 14:24 16:15 17:13,14 18:19 22:7,13 22:17 26:2,3,4 26:5 27:2,3,7 27:17,19,21 28:10 31:11,16 32:17,25 33:17 33:18 34:17,21 35:2,7,10 36:22 37:3,4,6 38:3,21,24 39:3,13,14 40:4 42:8,12 42:16 44:7 48:15,19,25 50:10,11 52:4 52:6 53:14 54:5,14,15 56:10,14,20,21 56:21,22 57:9
<b>STEVEN</b> 1:9	<b>suited</b> 27:18	<b>sworn</b> 97:14	<b>terms</b> 8:4 32:14 33:8 55:19 78:8 80:6,9 94:7	
<b>Stokesbary</b> 2:4 3:13 4:18 10:4 11:5,16,18 14:17 23:15 37:8 39:21 40:3,14,24 41:3,15,16 46:8,13 47:10 60:6 61:8,22 67:16 70:17 80:8,11 85:2 86:9,15,18,21 88:12 91:14 92:20,24 95:22 96:9	<b>summation</b> 29:6	<b>sworn/affirmed</b> 4:5	<b>testified</b> 4:6 74:3	
<b>stop</b> 63:7 82:14	<b>summer</b> 82:11	<b>system</b> 51:17	<b>testify</b> 73:25 97:14	
<b>Street</b> 2:5,11,18	<b>Sumner</b> 2:5	<b>T</b>	<b>testimony</b> 5:20 9:12 74:4,8 97:16	
	<b>Sunnyside</b> 26:3 56:8 58:9,10	<b>T</b> 3:17 4:8 8:1 92:23 97:1,1	<b>text</b> 79:4 80:15 82:5,18,23 83:10,12,14 87:4,20,23 89:11 90:1,22 90:23 91:1 92:6	
	<b>support</b> 20:3	<b>tacos</b> 62:24	<b>texted</b> 78:14 82:15 89:4	
	<b>supporting</b> 53:7	<b>tail</b> 48:24 49:1	<b>texting</b> 82:23 83:2	
	<b>suppose</b> 70:12	<b>take</b> 6:12,15,18 10:18 35:23 48:22 62:22 76:4 88:10	<b>texts</b> 15:10 78:22 79:7 82:17 87:24 90:14	
	<b>supposedly</b> 73:23	<b>takes</b> 37:4	<b>Thank</b> 7:12	
	<b>Supreme</b> 47:16	<b>talk</b> 5:6 9:16 10:25 13:1,6 29:14 35:18 37:12 46:10 48:1 73:9 83:11		
	<b>sure</b> 5:9,9,19 6:17 8:2 10:1 32:1,4 39:23 42:16 45:7 49:11,13,14,22 50:10 52:16 53:15 54:7 55:16,19 56:8 57:6 59:23 74:21 84:1 87:19 89:17 90:7,9 91:14	<b>talked</b> 12:22 20:14 21:19 31:3 32:13 35:17 41:12 47:9 72:3 87:3 87:12 95:6		
		<b>talking</b> 22:6,23 24:22 26:18 28:14 49:10		

57:9 58:2,13 58:16,21,22 60:7,22 61:24 62:1,7,14,20 63:1 64:23 65:8,23 68:20 68:24 71:16,20 72:1,8 75:13 77:21 78:14,24 80:19 81:10,11 82:19 84:16,19 84:23 86:25 87:22 88:6,18 90:3,21 91:4 92:1 93:19 95:3 96:12,13 <b>thinking</b> 12:6,20 55:1 58:6 59:5 72:12,25 77:10 87:9 <b>thinks</b> 32:6 <b>thinned</b> 63:16 <b>Third</b> 81:22 <b>thorough</b> 91:10 91:13 92:5 <b>thought</b> 19:18 21:25 23:4 24:8 30:17,19 34:12,20 38:1 40:19 51:10 54:25 55:3,3,4 66:12 79:7 <b>thousand</b> 36:17 <b>three</b> 20:15 51:15 54:4,5 71:16 82:13 86:10 92:25 <b>THRIFT-VIV...</b> 2:17 <b>Thursday</b> 1:20 <b>tier</b> 50:18 <b>ties</b> 94:3 <b>time</b> 6:3,18 7:10 9:5 10:6 19:17 30:6 34:7,15	36:2,2,4,21,21 38:12 44:19 45:7 48:7 54:3 62:3 68:4 76:22 91:6,7 92:8,11 97:10 97:17 <b>timeframe</b> 44:14 90:10 <b>times</b> 10:3 19:16 50:2 94:18 <b>tired</b> 6:13 <b>title</b> 17:12 21:12 <b>titled</b> 81:5 <b>today</b> 4:21 6:2 6:11 7:14 8:9 8:20 9:12,17 14:19 91:6 <b>today's</b> 4:16 8:3 <b>told</b> 31:24 47:23 85:5 <b>topic</b> 87:24 88:3 <b>Toppenish</b> 57:12 58:1,17 <b>Torres</b> 21:8,18 38:18,20 39:10 39:16 <b>Torres's</b> 21:22 <b>total</b> 16:15 <b>totally</b> 6:14 <b>touch</b> 27:1 <b>touched</b> 16:18 60:22 <b>tour</b> 19:9 <b>toured</b> 19:8,8 <b>tours</b> 17:13 <b>towns</b> 71:15 <b>tractor</b> 63:13 <b>transcribed</b> 97:8 97:16 <b>transcript</b> 5:14 96:15 97:16,18 <b>trend</b> 95:3 <b>Trevino</b> 1:13 42:7,18 43:1	<b>Tri-Cities</b> 52:25 54:4 93:9,12 93:15,19,25 94:4 <b>trial</b> 44:6 <b>trips</b> 44:12 <b>Troyer</b> 22:23 24:25 25:2,6 25:15 26:7 29:16 30:2,7 31:20 32:15 33:16 35:17 38:20 39:16 41:7,24,25 83:11,17 87:5 90:14 95:7 <b>truck</b> 63:13 <b>trucks</b> 19:4 <b>true</b> 97:16 98:3 <b>truth</b> 4:5,6,6 8:21 97:14,15 97:15 <b>truthful</b> 8:11 <b>try</b> 5:10 74:19 <b>trying</b> 26:5 61:11 <b>turn</b> 84:7 <b>TV</b> 66:6 <b>two</b> 4:22 20:14 42:10,10 51:14 51:15 53:8,24 54:16 59:7 61:2 77:20,21 82:13 85:16 86:10 95:12,15 <b>typewritten</b> 97:7 <b>typically</b> 36:7	68:22 81:1 83:16 <b>umbrella</b> 50:19 <b>unavailable</b> 44:8 <b>underqualified</b> 32:9 <b>undersigned</b> 97:4 98:2 <b>understand</b> 5:21 6:2 8:7,9,24 23:9 28:21 54:24 55:13 56:2 58:10 68:9,20 73:12 73:23 77:11 <b>understanding</b> 24:3 25:10 28:2,5,14,17 59:1 60:12 61:18 73:14,17 73:20 <b>understood</b> 6:6 <b>unemployed</b> 51:7,8 <b>UNITED</b> 1:4 <b>unmuting</b> 95:20 <b>USDC</b> 98:21 <b>use</b> 55:9,19 78:8 80:7 82:23 83:2 <b>usually</b> 15:19	<b>venture</b> 60:3 <b>verbal</b> 5:15 <b>verify</b> 91:20 <b>version</b> 73:10,10 <b>videoconferen...</b> 2:2 <b>views</b> 24:20 <b>visible</b> 15:2 <b>visit</b> 19:5 <b>voice</b> 83:22,25 <b>volunteer</b> 52:1 77:23 <b>volunteered</b> 53:9 <b>vote</b> 24:12,19 31:24 34:20 65:7 66:3 69:3 69:6,8,19 74:24 75:7,15 75:18 95:16 96:8 <b>voter</b> 69:11 <b>voters</b> 28:3,6 64:12,15,18,22 65:2,3 67:9,23 67:23 68:6,6 68:17 69:1,1 74:23,25 75:5 75:5,10,11 <b>votes</b> 67:5 <b>voting</b> 47:6 59:24 60:2 64:11,14,17 65:4,6 66:22 67:1,13 68:17 68:21 70:14 73:3
				<b>V</b>
				<b>v</b> 1:8 41:15 45:10,16,17 98:20 <b>vague</b> 11:6 <b>Valley</b> 55:11 <b>values</b> 27:19,20 27:22,24 28:12 28:23 29:5 75:2,14,16,18 96:8 <b>various</b> 93:4
		<b>U</b>		<b>W</b>
		<b>U.S</b> 19:17 <b>uh-uh</b> 5:16 <b>ultimately</b> 38:8 38:9,10 <b>um-hmm</b> 5:16 6:21 8:8 37:6		<b>Waddell</b> 51:16 51:16 <b>waived</b> 97:9 <b>Walla</b> 55:15,15 <b>want</b> 4:12,23 9:5 9:16 12:17

22:5,20 23:3	24:4 34:23	74:23 75:5,10	<b>worn</b> 49:23	37:3,4 39:25
24:21 25:16	45:24 74:16	93:24 94:6	<b>worries</b> 68:12	40:20 42:4,16
26:3 31:13,16	90:20	95:13	<b>worry</b> 5:24	45:23 46:16
32:14,24 33:17	<b>ways</b> 55:20	<b>whiteboard</b> 81:6	29:10	47:13,13,22
41:23 46:5,5	<b>we'll</b> 6:17 9:6	<b>wife</b> 19:5 30:9	<b>wouldn't</b> 28:8	48:9,14 53:5
52:5,10 54:3	74:19	30:12,14,23	34:7 60:3	53:19 55:22,24
54:21 56:10	<b>we're</b> 6:19 12:25	31:7 32:19	<b>WPPSS</b> 50:6	56:7 57:14,24
57:5,9,10	13:4 15:7 27:6	51:9	<b>wrapping</b> 88:23	60:11 62:13
60:11,22 61:10	31:25 40:13	<b>wife's</b> 33:2,4	<b>write</b> 50:1	64:9 66:15,15
62:12,22 68:20	45:3 47:25	<b>win</b> 64:20 65:2	<b>written</b> 5:14	67:19 68:19
71:12,25 73:8	48:1 55:5,8,19	<b>windows</b> 15:1	13:25 74:4	70:20 71:21
76:4,10,21	55:23 56:2	<b>winters</b> 34:10		72:5,7,7,11
79:19,20 82:12	59:3 61:15	38:14	<b>X</b>	73:1 75:3
84:1 91:7 94:7	62:2,2 75:4,4,5	<b>witness</b> 2:3 40:6	<b>X</b> 3:17 4:8 15:19	76:16 77:7,8
95:8,9	88:18	41:21 46:12,15	15:21 81:9	78:4,5,24,24
<b>wanted</b> 22:6,9	<b>we've</b> 19:4 31:16	60:8 88:14	92:23	79:12,12 81:10
47:14 79:1	32:13 59:7	92:12,17,22		81:13,13 83:4
88:24	60:17,19	96:11 97:6,7,9	<b>Y</b>	83:19,21 84:15
<b>Wapato</b> 33:19	<b>wear</b> 49:23 50:3	97:14,19 98:20	<b>yada</b> 14:9,9	84:16,19,24
58:14,16	<b>web</b> 15:17	<b>wondering</b>	<b>Yakama</b> 48:6	85:9,9,21 86:6
<b>washed</b> 51:10	<b>week</b> 50:23	44:19 91:11	93:23 94:1,2	86:24 88:12,14
<b>Washington</b> 1:4	<b>weeks</b> 44:8	<b>word</b> 18:20 23:1	<b>Yakima</b> 18:6,9	88:14 89:10,14
1:10,10 2:5,12	<b>weighting</b> 24:17	24:14 31:10	18:15 19:7,8	90:2,15,18,21
2:23 3:2,5,6	<b>welcome</b> 92:12	36:24 39:2	22:17 33:21	91:25 94:22
4:17 7:18	92:17	62:8 80:3	42:12,22 54:12	96:7
13:20 17:2,5	<b>went</b> 19:23 20:1	<b>wording</b> 12:8	54:12 55:10	<b>year</b> 48:18 50:10
48:10 54:10,24	20:1,7 48:12	<b>words</b> 24:10	56:18,21 57:8	53:24 54:16
55:4,5,10,20	48:17 50:8,8	<b>work</b> 6:23 9:9	59:21 93:16,18	73:11 82:10
56:1 59:25	51:15 79:18,20	17:4 22:7	93:21,21 94:3	92:2
60:5 61:7,21	80:1,22 89:16	31:11,23 48:2	94:3	<b>years</b> 17:18 18:6
62:15 64:12,15	90:4 92:2	50:4 51:11,15	<b>Yakima/More...</b>	20:15,15 25:16
64:18 66:22	93:24	52:2 60:20,25	18:14	25:17,17 30:8
67:1,2,9,11,25	<b>West</b> 2:23 7:18	63:1,12,19	<b>Ybarra</b> 1:14	30:16 31:9
68:8,18 69:3	<b>Western</b> 1:4	74:19 88:11	42:15 43:3	42:23 49:20
70:5 74:1,5,12	55:5 98:21	<b>worked</b> 50:11	<b>yeah</b> 10:6 11:23	51:14,15,18
93:5 97:2,4,5	<b>WhatsApp</b> 83:3	51:24 52:1	14:15,15 18:4	52:2,4 53:24
97:18,23,24	<b>wheelchairs</b>	64:2,2	19:19,23,23	54:8,13 69:24
98:21	19:4	<b>workers</b> 60:19	21:7,24 22:4	71:11
<b>wasn't</b> 10:11	<b>WHEREOF</b>	<b>workforce</b> 62:1	22:12 25:23	
39:3 52:11,24	97:19	<b>working</b> 11:14	26:4,6,16,21	<b>Z</b>
85:8 86:11	<b>white</b> 8:5,6 48:4	11:25 49:5,10	29:7,10,11	<b>zone</b> 49:15
87:15 91:21	48:11 62:18	50:6 51:13	30:20,25 31:12	<b>Zoom</b> 2:2 9:18
<b>water</b> 6:13	64:18 65:2,3	62:17 91:12	32:4 33:8 34:6	14:21 15:3,15
63:14,15,25	67:23 68:6,17	<b>works</b> 6:18	34:21 35:1,16	15:18 75:23
<b>way</b> 6:22 9:18	68:23 69:1,7	17:12 41:4	35:20 36:8,25	

<b>0</b>	73:12,16 81:5	<b>80</b> 48:18		
<b>09</b> 81:5	97:20 98:22	<b>800</b> 3:6		
<b>1</b>	<b>2023</b> 44:9 97:23	<b>833</b> 1:23 98:24		
<b>10:29</b> 44:24	<b>23rd</b> 97:20	<b>8h</b> 44:8		
<b>10:42</b> 44:24	<b>24</b> 48:11	<b>8th</b> 29:23 31:16		
<b>1003-1/2</b> 2:5	<b>2711</b> 1:22 97:23	<b>9</b>		
<b>11:00</b> 53:1	98:23	<b>9:29</b> 1:20 4:2		
<b>11:30</b> 75:24	<b>3</b>	<b>90</b> 50:24,24		
<b>11:34</b> 75:24	<b>3:22-cv-05035...</b>	<b>90014</b> 2:19		
<b>11:58</b> 88:17	1:10 98:21	<b>9008</b> 7:18		
<b>1101</b> 2:11	<b>308-14-135</b>	<b>92</b> 3:13		
<b>11th</b> 2:18	97:18	<b>95</b> 50:10		
<b>12</b> 81:5	<b>365-3376</b> 1:23	<b>98104</b> 3:6		
<b>12:00</b> 53:1	98:24	<b>98390-1444</b> 2:5		
<b>12:05</b> 88:11	<b>4</b>	<b>99336</b> 2:23		
<b>12:06</b> 88:17	<b>4</b> 3:13			
<b>12:29</b> 1:20 96:16	<b>40</b> 56:20 57:10			
<b>13</b> 1:20 4:1	58:22			
98:22	<b>400</b> 2:11			
<b>14th</b> 2:11	<b>5</b>			
<b>15</b> 13:7 29:21	<b>5</b> 2:5			
30:7,13,15	<b>5.28.010</b> 97:4			
32:17 33:16	<b>50</b> 56:3,5,13			
34:5,16 35:18	58:2,22			
38:8,18 45:11	<b>56</b> 48:9 63:21			
46:3,21,23	<b>58</b> 48:10			
72:17,24 73:3	<b>6</b>			
73:9,15 87:6	<b>60</b> 56:10 57:5			
87:10	58:8,16 59:4			
<b>15th</b> 12:11 34:8	<b>634</b> 2:18			
<b>1990</b> 50:5,7	<b>65</b> 54:18			
<b>1st</b> 44:8	<b>6th</b> 63:23			
<b>2</b>	<b>7</b>			
<b>2</b> 47:6 97:23	<b>70</b> 58:12			
<b>20</b> 10:15 16:17	<b>7325</b> 2:23			
<b>2000</b> 3:6	<b>79</b> 48:18			
<b>20005</b> 2:12	<b>7th</b> 63:23			
<b>2011</b> 50:11 51:4	<b>8</b>			
<b>2021</b> 11:14,25	<b>8</b> 33:24 34:2,17			
16:20 17:1	70:23 71:1,4			
74:1,5,12				
79:24 90:5,20				
<b>2022</b> 1:20 4:1				



# EXHIBIT C

Soto Palmer, et al.

v.

Hobbs, et al.

\* \* \* \* \*

Remote Deposition Upon Oral Examination of  
Heliodora Morfin  
December 6, 2022

\* \* \* \* \*

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Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

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SUSAN SOTO PALMER, et al., )  
Plaintiffs, )  
v. )  
STEVEN HOBBS, in his official )  
capacity as Secretary of State )  
of Washington, and the STATE OF )  
WASHINGTON, ) No. 3:22-cv-05035-RSL  
Defendants, )  
and )  
JOSE TREVINO, ISMAEL G. CAMPOS, )  
and State Representative )  
ALEX YBARRA, )  
Intervenor-Defendants. )

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REMOTE DEPOSITION UPON ORAL EXAMINATION OF  
HELIODORA MORFIN

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Tuesday, December 6, 2022  
9:06 a.m. to 9:49 a.m.

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6 Andrew.Hughes@ATG.Wa.gov  
7  
8  
9 \*\*\*\*\*  
10  
11 EXAMINATION INDEX  
12  
HELIODORA MORFIN PAGE  
13 By Mr. Bowen 5  
14  
15  
16 \*\*\*\*\*  
17 EXHIBIT  
18 NUMBER DESCRIPTION INTRODUCED  
19 1 Screenshot of Elections & Voting 20  
November 8, 2022 General Election  
for Legislative District 15  
20  
21  
22  
23  
24  
25

Page 4

1 December 6, 2022, Remote Proceedings:  
2 PROCEEDINGS: 9:06 a.m.  
3 (Discussion off the record.)  
4 HELIODORA MORFIN,  
5 having been sworn/affirmed on oath to tell the truth, the  
6 whole truth, and nothing but the truth, testified as  
7 follows:  
8 MR. BOWEN: Okay. I know that I noted this  
9 up front for everybody, but I just want to get on the  
10 record that there have been some internet outages in our  
11 office park the last few days, and we're currently working  
12 on fixing it; and I hope it's not a problem today, but if  
13 I lose connection I just ask that everyone would wait and  
14 see if we can reestablish connectivity. If not, I have a  
15 hot spot that may work if it's just not enough bandwidth  
16 to get this done. I'll send out an email, and we can keep  
17 the deposition open and just reschedule for a different  
18 time to finish if it looks like we can't resolve whatever  
19 connectivity issues might come up.  
20 Also, in previous depositions we've agreed that an  
21 objection by one preserves it for all.  
22 Is everybody still okay with that today?  
23 MS. LEEPER: (Nodded.)  
24 MR. BOWEN: All right. I'm going to take  
25 the silence as --

Page 5

1 MS. LEEPER: We are.  
 2 MR. HUGHES: Yes.  
 3 MR. BOWEN: Okay. Perfect. Thank you.  
 4 EXAMINATION  
 5 BY MR. BOWEN:  
 6 Q Well, good morning, Ms. Morfin. My name is  
 7 Brennan Bowen. I'm an associate with Holtzman Vogel, and  
 8 we represent the Intervenor-Defendants in this matter.  
 9 I just wanted to thank you for your time today, and  
 10 I'm going to try to keep this as short and as painless as  
 11 possible. My plan is to start off with some general  
 12 questions about your background and yourself, and then I'm  
 13 going to discuss the specifics of this case.  
 14 Could you please state your full name on the record  
 15 for me?  
 16 A Yes. Heliodora Morfin.  
 17 Q Okay. And is there anything you prefer to be  
 18 called?  
 19 A Dora.  
 20 Q Dora. All right, Dora. Have you ever been deposed  
 21 before, Dora?  
 22 A No.  
 23 Q Okay. I'm just going to lay out some ground rules  
 24 before we get started. First, I know we have a  
 25 stenographer here, but is there anyone else recording

Page 7

1 down. It will also give anybody time for objections.  
 2 Much as I would love it if there were none, I'm sure we'll  
 3 have objections today, so we'll let them voice the  
 4 objections.  
 5 All responses are going to have to be audible. So I  
 6 know in a normal conversation we shake and nod our heads,  
 7 and there's hand gestures. None of that is getting into  
 8 the record. So even if it's just a simple yes or no, just  
 9 make sure to say it as opposed to nodding or shaking your  
 10 head.  
 11 Do you understand that you are under oath today?  
 12 A Yes.  
 13 Q Okay. And that oath has the same effect as if you  
 14 were in court. Do you understand that as well?  
 15 A Yes.  
 16 Q Okay. If my questions are unclear, then please let  
 17 me know and I'll try to clarify them. If you answer, I'm  
 18 going to assume that you understood them.  
 19 Does that make sense?  
 20 A Yes.  
 21 Q Okay. If your attorney objects today, those are for  
 22 later proceedings. Unless your attorney specifically  
 23 instructs you not to answer, I'm going to ask that you let  
 24 your attorney object, and then you continue to answer my  
 25 question after that objection.

Page 6

1 this?  
 2 A I don't believe so.  
 3 Q No? Okay. And I know that Zoom has a mute  
 4 function. I'm going to ask that during our deposition  
 5 that you don't use that unless it's clear that we're  
 6 taking a break or doing something like that. Okay?  
 7 A Okay.  
 8 Q Is there anyone in the room with you who is not on  
 9 camera?  
 10 MR. MORFIN: Just me. Edwardo Morfin,  
 11 Morfin Law Firm.  
 12 MR. BOWEN: Edwardo, good to meet you.  
 13 Q (By Mr. Bowen) Do you have any applications open on  
 14 your computer that someone could use to communicate with  
 15 you during the deposition, aside from Zoom?  
 16 A No.  
 17 Q Okay. Do you have any phones, tablets, any things  
 18 like that that are within eyesight that someone could use  
 19 to communicate with you during the deposition?  
 20 A No, I don't.  
 21 Q Okay. Since we're on Zoom I'm going to be  
 22 especially cautious not to talk over you or anyone else,  
 23 and I ask that you do the same. We'll give each other a  
 24 couple seconds pause in between asking and answering  
 25 questions. It will help the court reporter get everything

Page 8

1 Does that make sense?  
 2 A Yes.  
 3 Q Okay. If you need to take a break at any time, just  
 4 let me know. Like I said, I'm hoping this isn't going to  
 5 be a super long thing, but I understand stuff comes up.  
 6 If you need a break, I totally get it. The only thing I  
 7 would ask is that you finish answering whatever question  
 8 we were in the middle of answering. Any pending questions  
 9 I would like to have resolved before we go to break.  
 10 Does that work?  
 11 A Yes.  
 12 Q Okay. And finally, are you on any medication today  
 13 that could affect your ability to fully answer or  
 14 truthfully answer any of these questions, or are you  
 15 otherwise aware of any reason you couldn't fully and  
 16 truthfully answer questions today?  
 17 A I'm not under any medication.  
 18 Q Okay. All right. Thank you.  
 19 Now, other than conversations with your attorneys,  
 20 did you do anything to prepare for today's deposition?  
 21 A No, I did not.  
 22 Q Okay. Did you review anything, any documents?  
 23 A Just through the time that we have been talking to  
 24 our attorneys.  
 25 Q Okay. So you have reviewed the Complaint at some

Page 9

1 point since filing it?  
 2 A Yes.  
 3 Q Okay. Do you know when about that was?  
 4 A I got a set of documents in July, and we reviewed  
 5 them between July and August. And then I got another set  
 6 of documents within the last few weeks, and we reviewed  
 7 them within the last weeks or so -- so last week.  
 8 Q Okay. And have you spoken to anyone besides your  
 9 attorney about the deposition today?  
 10 A I have not.  
 11 Q Okay. Would you briefly walk me through where you  
 12 have lived for the past ten years or so? I know it's a  
 13 long time, so if you have to take time to think, but just  
 14 like general vicinities of where you've lived.  
 15 A Yes. I've lived in Pasco, in Pasco, Washington.  
 16 And I moved to the Seattle area on and off for ten years,  
 17 and back in the Tri-Cities for the last few years.  
 18 Q Okay. And when you say Tri-Cities, what area would  
 19 that be?  
 20 A Pasco.  
 21 Q Pasco?  
 22 A Yes.  
 23 Q Okay. And what is your current address?  
 24 A 1115 West Irving Street, Pasco, Washington, 99301.  
 25 THE REPORTER: Could you say the street

Page 11

1 Q Okay. What year did you graduate?  
 2 A 1993.  
 3 Q And then after that did you do any college or  
 4 vocational training?  
 5 A Yes. I did Lake Washington Technical College in the  
 6 Seattle area, and I went to Columbia Basin College and got  
 7 an accounting degree and business degree.  
 8 Q All right. And then after you got your accounting  
 9 and business degree what did you do professionally?  
 10 A I worked in office management, with accounting.  
 11 Q Okay. And is that what you do right now?  
 12 A No, I don't. I'm not doing that now.  
 13 Q What do you right now?  
 14 A I'm a caregiver.  
 15 Q And how long have you been doing caregiving for?  
 16 A About two years.  
 17 Q About two years. At any point in time have you had  
 18 involvement in the political arena, either like as a  
 19 volunteer or doing anything like that for a political  
 20 campaign?  
 21 A I have volunteered with Latino Civic Alliance in the  
 22 past.  
 23 Q Okay. And when was that?  
 24 A That was back in around 2009.  
 25 Q Okay. And have you done anything with them before

Page 10

1 again, please?  
 2 THE WITNESS: Yes. Irving, I-R-V-I-N-G,  
 3 Street, Pasco, Washington, 99301.  
 4 Q Okay. So if I understand this correct, you were in  
 5 Pasco, and then Seattle, Tri-Cities area, and then back  
 6 to -- or Tri-Cities area and back in Pasco; is that  
 7 correct?  
 8 A Yes. I currently live in Pasco.  
 9 Q Okay. Do you recall your address when you were in  
 10 the Seattle area?  
 11 A I don't recall my address, no. I just recall the  
 12 nearby streets.  
 13 Q Okay. What about when you were previously in Pasco,  
 14 do you recall your address then?  
 15 A Yes. 816 South Fourth Lane, Apartment B as in boy,  
 16 Pasco, Washington, 99301.  
 17 Q That's a good memory.  
 18 A Thank you.  
 19 Q You're welcome. Your current address then, under  
 20 your current address what legislative district do you live  
 21 in?  
 22 A Legislative District No. 15.  
 23 Q No. 15. Okay.  
 24 And where did you go to high school?  
 25 A I went to Pasco High, Pasco, Washington.

Page 12

1 or since?  
 2 A Not -- not currently, no.  
 3 Q Okay. What about any other political engagement,  
 4 any other groups you've been involved with?  
 5 A No, not -- nothing I can think of.  
 6 Q Okay. Have you had any professional training or  
 7 education about redistricting specifically?  
 8 A No, not really.  
 9 Q And have you ever worked in government, either state  
 10 or local government?  
 11 A I worked for a local municipality.  
 12 Q What were you -- What municipality were you working  
 13 for?  
 14 A For Clean Air.  
 15 Q Okay. And what was your role there?  
 16 A I did front office, customer service and accounting.  
 17 Q Okay. I'm going to switch a little bit from work  
 18 experience to just some personal background information.  
 19 Could you identify your race for me?  
 20 A Other.  
 21 Q Other. Could you let me know how you identify your  
 22 ethnicity?  
 23 A Mexican.  
 24 Q Mexican. And just to confirm, I think we talked  
 25 about this before when he introduced himself, but the

Page 13

1 attorney for plaintiffs' counsel here, Eddie Morfin, that  
 2 is your husband?  
 3 A No. He's part of the attorneys.  
 4 Q He's just part of the attorneys. No relation?  
 5 A No.  
 6 Q Okay. And when did you become aware of the  
 7 Redistricting Commission's existence?  
 8 A I heard about it through previous information in  
 9 Pasco, I would say about five years ago.  
 10 Q And did you attend -- I guess what was the previous  
 11 information you had heard about the Commission?  
 12 A The City of Pasco was being involved in a lawsuit  
 13 for redistricting.  
 14 Q Okay. And that previous commission you heard about,  
 15 was that specific to the City of Pasco, or was that the  
 16 State Redistricting Commission?  
 17 A I really don't know because it's -- It was -- I was  
 18 not informed of -- How can I explain it? I really don't  
 19 know at what level it was.  
 20 Q Okay. That's fine.  
 21 For this Redistricting Commission, the one that drew  
 22 the state maps this go-around, when did you first hear  
 23 about that Commission?  
 24 A I don't remember the exact time, honestly.  
 25 Q Okay. Did you follow what the Commission was doing?

Page 15

1 Q Okay. Would you happen to know how many were say  
 2 Republican versus Democrat?  
 3 A I would not know.  
 4 Q What about the number of nonpartisan chairs on the  
 5 Commission, do you know how many there were?  
 6 A I don't.  
 7 Q Or any of their names?  
 8 A No, I don't. I'm sorry.  
 9 Q That's okay. No need to apologize.  
 10 Did you review the final map that the Commission  
 11 passed?  
 12 A The current map? Yes.  
 13 Q Okay. What was your first impression when you saw  
 14 that map?  
 15 A That it's not the map that we proposed.  
 16 Q When you say we, who is we?  
 17 A Just our group that we suggested.  
 18 Q So there was a group that had suggested a different  
 19 map to the Commission?  
 20 A That the attorneys suggested for us, with us.  
 21 Q Okay. So had you seen the Commission's map before  
 22 this lawsuit was started?  
 23 A No, I did not.  
 24 Q Okay. So how did you come to be involved in the  
 25 lawsuit?

Page 14

1 A I just really follow what the information we were  
 2 learning about.  
 3 Q Okay. So did you, for example, attend any of the  
 4 public hearings that the Commission held?  
 5 A I did not.  
 6 Q Okay. Did you review any of the publicly released  
 7 information that the Commission put out?  
 8 A Just the information that was provided by our  
 9 attorneys.  
 10 Q Okay. During the process of the Redistricting  
 11 Commission did you submit anything to them, any comments  
 12 or questions about the process?  
 13 A Personally, no.  
 14 Q No. Okay. Could you maybe explain to me how you  
 15 understand the redistricting process to work in the State  
 16 of Washington?  
 17 A I believe it's chosen by the legislative, certain  
 18 maps; and the people that are within those boundaries  
 19 vote, and it gets either approved or denied.  
 20 Q And do you know how many commissioners were on the  
 21 Commission?  
 22 A I don't know.  
 23 Q Okay. Do you recall maybe some of the names of the  
 24 commissioners?  
 25 A I do not.

Page 16

1 A I honestly don't remember exactly how I got  
 2 involved, but once I learned about -- about it, then I  
 3 just became involved.  
 4 Q Okay. Do you remember was there an attorney who  
 5 approached you, or was it a friend?  
 6 A I really don't remember.  
 7 Q Okay. So if I understand right, the Commission  
 8 passed a map. The lawsuit started, and you became  
 9 involved. And at that point you saw the map for the first  
 10 time; is that right?  
 11 A I don't know that it happened in that order. It  
 12 honestly was a long time ago, and I truly don't remember.  
 13 Q Okay. But you hadn't seen the final map until this  
 14 lawsuit was already going and the attorneys approached  
 15 you?  
 16 A I don't believe that's how it happened. I honestly  
 17 would have to go back and think more about it on how it  
 18 happened.  
 19 Q Okay. No rush, but if you just want to take a  
 20 minute to think about it right now, --  
 21 A I need more time.  
 22 Q -- maybe you can try to --  
 23 Okay. Did you review the maps that --  
 24 Oh, I saw your hand.  
 25 A Yeah, I would like to take a small break, please.

Page 17

1 MR. BOWEN: Okay. Go ahead. A five-minute  
 2 break, does that work?  
 3 THE WITNESS: Yeah, that would be great.  
 4 MR. BOWEN: Thanks.  
 5 THE WITNESS: Thank you.  
 6 MR. BOWEN: So we'll reconvene in five  
 7 minutes.  
 8 (Break 9:25 a.m. to 9:37 a.m.)  
 9 MR. BOWEN: Okay. Back on the record.  
 10 Q (By Mr. Bowen) When we left off we were talking  
 11 about the final map proposed by the Commission. Before  
 12 the Commission had proposed a final map the individual  
 13 commissioners proposed their own maps.  
 14 Were you able to look at any of the individual  
 15 commissioners' proposed maps?  
 16 A I don't remember.  
 17 Q Okay. Do you know how many maps each commissioner  
 18 proposed?  
 19 A No, I don't.  
 20 Q Could you tell me what the Hispanic citizen voting  
 21 age population percentage was in the final map for the  
 22 15th Legislative District?  
 23 A I don't know that answer.  
 24 Q Okay. Are you familiar with the term citizen voting  
 25 age population?

Page 19

1 or what you think this case is about.  
 2 A I believe that I would like to be represented in my  
 3 district by a person that represents my values.  
 4 Q Okay. And you think the current map does not do  
 5 that?  
 6 A Correct.  
 7 Q Can you explain how the map as it's drawn prevents  
 8 you from electing someone who represents your values?  
 9 A I wouldn't be able to explain all that.  
 10 Q Okay. What are the values that you're looking for  
 11 in an individual to represent you?  
 12 A I would just like the opportunity to have the  
 13 representative of my choice that aligns within the  
 14 boundaries of where I'm at, where I live.  
 15 Q Okay. And talking about a representative of your  
 16 choice, did you vote in this last election that just  
 17 happened a few weeks back, the 2022 midterms?  
 18 A Yes.  
 19 Q Did you vote for a state senator from Legislative  
 20 District 15? Did you vote in that race?  
 21 A I did not.  
 22 Q You did not. Have you previously voted in  
 23 legislative district -- or legislative races for your  
 24 district?  
 25 A Yes, I have.

Page 18

1 A No, I'm not.  
 2 Q Okay. So is it fair to say then that you wouldn't  
 3 have an opinion about what I'm going to call the CVAP, the  
 4 citizen voting age population, the CVAP for Legislative  
 5 District 15?  
 6 A I'm not understanding your question.  
 7 Q Okay. Let me try to rephrase. There's a percentage  
 8 that tells us how many citizens of voting age in the  
 9 population have any given characteristics. So when I say  
 10 Hispanic citizen voting age population, it means how many  
 11 people in that population who can vote identify as  
 12 Hispanic.  
 13 Does that make sense?  
 14 A Yes.  
 15 Q Are you aware of what that percentage was for the  
 16 15th Legislative District?  
 17 A I don't know.  
 18 Q Okay. In your Amended Complaint you asserted two  
 19 different claims. Could you just tell me about them?  
 20 A I'm not really sure exactly what you're asking me.  
 21 Q Yes. So you guys sued the -- You sued the State of  
 22 Washington and Secretary Hobbs. In that lawsuit, the  
 23 Complaint that was filed, there are two different claims  
 24 you make against them. I was just wondering if you could  
 25 tell me in your own words what you think those are about

Page 20

1 Q Okay. But you did not vote in the 2022 midterm?  
 2 A I did not.  
 3 Q Had you voted could you tell me which of the two  
 4 candidates would have been representative of your choice?  
 5 A In the ballot there was only one representative.  
 6 (Court reporter request to repeat.)  
 7 MR. BOWEN: I'm sorry. What, Jeanne?  
 8 THE REPORTER: I just wanted her to repeat  
 9 her answer. It wasn't clear to me.  
 10 MR. BOWEN: Oh, okay.  
 11 A In my ballot there was only one representative  
 12 choice.  
 13 Q For the state senate race in Legislative District 15  
 14 you only had one representative?  
 15 A In my November ballot, yes.  
 16 Q Okay. I'm going to --  
 17 (Website displayed.)  
 18 MR. BOWEN: Jeanne, are you capable of  
 19 taking a screenshot to send as an exhibit, or would I have  
 20 to do that?  
 21 THE REPORTER: I can take a screenshot.  
 22 (Screenshot taken.)  
 23 MR. BOWEN: Okay. I'd like to admit this  
 24 as Exhibit 1. Let me screen share real quick.  
 25 (Morfin Exhibit No. 1 identified and displayed.)

Page 21

1 MR. BOWEN: Okay. Is this coming through  
 2 for everybody?  
 3 MS. LEEPER: Yes.  
 4 THE REPORTER: Yes. And I just took a  
 5 screenshot.  
 6 MR. BOWEN: Okay. Thank you, Jeanne.  
 7 Could you put that -- Just so everyone has that, could you  
 8 put that in the chat as well when you have a minute?  
 9 THE REPORTER: Yes. Do you want me to do  
 10 that right now?  
 11 MR. BOWEN: Sure. I guess no, we'll wait  
 12 until the end you can send it, just because everyone can  
 13 see my screen right now.  
 14 THE REPORTER: Okay.  
 15 Q (By Mr. Bowen) Dora, I'm on the Secretary of State's  
 16 website. Is that what you're seeing as well?  
 17 A Yes.  
 18 Q Okay. And can you see right here, this says  
 19 Legislative District 15; correct?  
 20 A Yes.  
 21 Q And this is for the November 8th, 2022 general  
 22 election?  
 23 A Yes, I see that.  
 24 Q Is that right? Okay. And right here what I'm  
 25 highlighting, this says State Senator for Legislative

Page 22

1 District 15, this first race.  
 2 Do you see that?  
 3 A Yes.  
 4 Q And how many candidates do you see under that race?  
 5 A Two.  
 6 Q Two. And you currently reside in Legislative  
 7 District 15; correct?  
 8 A That's correct.  
 9 Q Okay. Did you see these two candidates on your  
 10 ballot for this state senate seat?  
 11 A I honestly don't remember because I didn't vote for  
 12 the state senator.  
 13 Q Okay. I'm going to stop screen sharing here, if I  
 14 can figure it out. Okay.  
 15 Did you vote for any of the state level candidates  
 16 in Legislative District 15? Let me -- Strike that. Let  
 17 me rephrase.  
 18 Did you vote -- Strike that. I'm going to leave it  
 19 alone.  
 20 How many races would you say that you did not vote  
 21 for on your ballot?  
 22 A I don't remember.  
 23 Q Okay. Going back to you telling me what this case  
 24 is about, you had said that you felt you couldn't elect  
 25 candidates of your choice; is that right?

Page 23


1 A I don't remember exactly verbatim what I said, but I  
 2 would like to have the opportunity to have a  
 3 representative --  
 4 Q Okay.  
 5 A -- of my choice.  
 6 Q Do you have that opportunity right now?  
 7 A No.  
 8 Q Why do you say that?  
 9 A Because the way that the legislative is set up.  
 10 Q Could you explain more about that?  
 11 MS. LEEPER: Object. That was asked and  
 12 answered.  
 13 Q (By Mr. Bowen) Dora, as we're going through the  
 14 deposition today, is there anything you wish I had asked  
 15 you that you want to talk about?  
 16 A No.  
 17 MR. BOWEN: Okay. Does anyone else have  
 18 any questions?  
 19 (No audible response.)  
 20 MR. BOWEN: Not hearing any, I am going to  
 21 end the deposition. And Dora, I thank you for your time.  
 22 And Jeanne, I think we're good to go off the record  
 23 now.  
 24 (Deposition concluded at 9:49 a.m.)  
 25 (Signature reserved.)

Page 24

1 CERTIFICATE  
 2 STATE OF WASHINGTON )  
 ) SS  
 3 County of King )  
 4 I, the undersigned Washington Certified Court  
 5 Reporter, pursuant to RCW 5.28.010 authorized to  
 6 administer oaths and affirmations in and for the State of  
 7 Washington, do hereby certify:  
 8 That the annexed and foregoing deposition of the  
 9 witness named herein was taken stenographically before me  
 10 and reduced to typewritten form under my direction.  
 11 I further certify that the witness examined will be  
 12 given an opportunity to review and sign their deposition  
 13 after the same is transcribed, unless indicated in the  
 14 record that the parties and witness waived the signing.  
 15 I further certify that all objections made at the  
 16 time of said examination to my qualifications or the  
 17 manner of taking the deposition or to the conduct of any  
 18 party have been noted by me upon the deposition.  
 19 I further certify that I am not a relative or an  
 20 employee or attorney or counsel of any of the parties to  
 21 said action, or a relative or employee of any such  
 22 attorney or counsel, and that I am not financially  
 23 interested in the said action or the outcome thereof.  
 24 I further certify that the witness before examination  
 25 was by me duly sworn to testify the truth, the whole  
 truth, and nothing but the truth.  
 I further certify that the deposition, as  
 transcribed, is a full, true and correct transcript of the  
 testimony, including questions and answers and all  
 objections, motions and exceptions of counsel made and  
 taken at the time of the foregoing examination and was  
 prepared pursuant to Washington Administrative Code  
 308-14-135, the transcript preparation format guideline.

IN WITNESS WHEREOF, I have hereunto set my hand this  
 11th day of December, 2022.

*Jeanne M. Gersten*  
 Jeanne M. Gersten, RDR, CCR  
 Registered Diplomat Reporter  
 Washington CCR No. 2711  
 License effective until April 2, 2023  
 Residing at Seattle, Washington





Heliodora Morfin

December 6, 2022

Page 25

1 CHANGE/SIGNATURE SHEET  
 2 I, the undersigned, HELIODORA MORFIN, hereby  
 3 certify that I have read the foregoing deposition and  
 4 that, to the best of my knowledge, said deposition is true  
 5 and accurate, with the exception of the following  
 6 corrections listed below:

5	PAGE	LINE	CHANGE	REASON
6				
7				
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14				
15				
16				
17				

18 \_\_\_\_\_  
 19 Signature Date

20 Witness: Heliodora Morfin  
 21 Soto Palmer, et al. v. Hobbs, et al.  
 22 USDC Western District of Washington at Seattle  
 23 Cause No. 3:22-cv-05035-RSL  
 24 Date: December 6, 2022  
 25 Reported by: Jeanne M. Gersten, RDR, CCR No. 2711  
 LAKESIDE REPORTING  
 (833) 365-3376  
 Jeanne@LakesideReporting.com  
 Contact@LakesideReporting.com

7 (Page 25)

Soto Palmer, et al. v. Hobbs, et al.  
LAKESIDE REPORTING (833) 365-3376

<b>A</b>	<b>answer</b> 7:17,23 7:24 8:13,14 8:16 17:23 20:9	<b>August</b> 9:5	<b>business</b> 11:7,9	<b>citizens</b> 18:8
<b>a.m</b> 1:19,19 4:2 17:8,8 23:24	<b>answered</b> 23:12	<b>authorized</b> 24:4	<b>C</b>	<b>City</b> 13:12,15
<b>A.R</b> 2:4	<b>answering</b> 6:24 8:7,8	<b>Avenue</b> 2:23 3:5	<b>C</b> 2:1 24:1,1	<b>Civic</b> 11:21
<b>ability</b> 8:13	<b>answers</b> 24:16	<b>aware</b> 8:15 13:6 18:15	<b>California</b> 2:19	<b>claims</b> 18:19,23
<b>able</b> 17:14 19:9	<b>anybody</b> 7:1	<b>B</b>	<b>call</b> 18:3	<b>clarify</b> 7:17
<b>accounting</b> 11:7 11:8,10 12:16	<b>Apartment</b> 10:15	<b>B</b> 3:17 10:15	<b>called</b> 5:18	<b>Clean</b> 12:14
<b>accurate</b> 25:3	<b>apologize</b> 15:9	<b>back</b> 9:17 10:5,6 11:24 16:17 17:9 19:17 22:23	<b>Camelback</b> 2:5	<b>clear</b> 6:5 20:9
<b>action</b> 24:12,13	<b>APPEARAN...</b> 3:1	<b>background</b> 5:12 12:18	<b>camera</b> 6:9	<b>Code</b> 24:18
<b>address</b> 9:23 10:9,11,14,19 10:20	<b>applications</b> 6:13	<b>ballot</b> 20:5,11,15 22:10,21	<b>campaign</b> 2:8,12 11:20	<b>college</b> 11:3,5,6
<b>administer</b> 24:5	<b>approached</b> 16:5,14	<b>bandwidth</b> 4:15	<b>CAMPOS</b> 1:12	<b>Columbia</b> 11:6
<b>Administrative</b> 24:18	<b>approved</b> 14:19	<b>Basin</b> 11:6	<b>candidates</b> 20:4 22:4,9,15,25	<b>come</b> 4:19 15:24
<b>admit</b> 20:23	<b>April</b> 24:23	<b>BBowen@Hol...</b> 2:6	<b>capable</b> 20:18	<b>comes</b> 8:5
<b>Affairs</b> 2:18	<b>area</b> 9:16,18 10:5,6,10 11:6	<b>behalf</b> 2:8,16,21	<b>capacity</b> 1:8	<b>coming</b> 21:1
<b>affect</b> 8:13	<b>arena</b> 11:18	<b>believe</b> 6:2 14:17 16:16 19:2	<b>caregiver</b> 11:14	<b>comments</b> 14:11
<b>affirmations</b> 24:5	<b>Arizona</b> 2:6	<b>BEN</b> 2:11	<b>caregiving</b> 11:15	<b>commission</b> 13:11,14,16,21 13:23,25 14:4 14:7,11,21 15:5,10,19 16:7 17:11,12
<b>age</b> 17:21,25 18:4,8,10	<b>ASEEM</b> 2:10	<b>best</b> 25:3	<b>case</b> 5:13 19:1 22:23	<b>Commission's</b> 13:7 15:21
<b>ago</b> 13:9 16:12	<b>aside</b> 6:15	<b>bit</b> 12:17	<b>Cause</b> 25:21	<b>commissioner</b> 17:17
<b>agreed</b> 4:20	<b>asked</b> 23:11,14	<b>boundaries</b> 14:18 19:14	<b>cautious</b> 6:22	<b>commissioners</b> 14:20,24 17:13
<b>AHarless@Ca...</b> 2:14	<b>asking</b> 6:24 18:20	<b>Bowen</b> 2:4 3:12 4:8,24 5:3,5,7 6:12,13 17:1,4 17:6,9,10 20:7 20:10,18,23 21:1,6,11,15 23:13,17,20	<b>CCR</b> 1:22 24:22 24:23 25:23	<b>commissioners'</b> 17:15
<b>ahead</b> 17:1	<b>asserted</b> 18:18	<b>boy</b> 10:15	<b>CENTER</b> 2:8,12	<b>communicate</b> 6:14,19
<b>Air</b> 12:14	<b>Assistant</b> 3:3	<b>BPhillips@Ca...</b> 2:15	<b>Center.org</b> 2:14 2:14	<b>Complaint</b> 8:25 18:18,23
<b>al</b> 1:5 2:8 25:20 25:20	<b>associate</b> 5:7	<b>break</b> 6:6 8:3,6 8:9 16:25 17:2 17:8	<b>certain</b> 14:17	<b>Complex</b> 3:4
<b>ALEX</b> 1:13	<b>assume</b> 7:18	<b>Brennan</b> 2:4 5:7	<b>Certified</b> 24:4	<b>computer</b> 6:14
<b>aligns</b> 19:13	<b>attend</b> 13:10 14:3	<b>briefly</b> 9:11	<b>certify</b> 24:5,7,9 24:11,14,15 25:2	<b>concluded</b> 23:24
<b>Alliance</b> 11:21	<b>attorney</b> 3:3,4 7:21,22,24 9:9 13:1 16:4 24:12,13	<b>Building</b> 2:18	<b>CHAIR</b> 25:5	<b>conduct</b> 24:10
<b>ALLISON</b> 2:11	<b>attorneys</b> 8:19 8:24 13:3,4 14:9 15:20 16:14		<b>CHANGE/SI...</b> 25:1	<b>confirm</b> 12:24
<b>Amended</b> 18:18	<b>audible</b> 7:5 23:19		<b>characteristics</b> 18:9	<b>connection</b> 4:13
<b>AMulji@Cam...</b> 2:14			<b>chairs</b> 15:4	<b>connectivity</b> 4:14,19
<b>ANDREW</b> 3:3			<b>CHANGE</b> 25:5	<b>Contact@Lak...</b> 1:24 25:25
<b>Andrew.Hugh...</b> 3:6			<b>CHANG/SL...</b> 25:1	<b>continue</b> 7:24
<b>Angeles</b> 2:19			<b>chat</b> 21:8	<b>continued</b> 2:25 3:1
<b>ANNABELLE</b> 2:10			<b>choice</b> 19:13,16 20:4,12 22:25 23:5	
<b>annexed</b> 24:6			<b>chosen</b> 14:17	
			<b>citizen</b> 17:20,24 18:4,10	

<b>conversation</b> 7:6	3:18	<b>election</b> 3:19	16:13 17:11,12	23:22
<b>conversations</b>	<b>different</b> 4:17	19:16 21:22	17:21	<b>go-around</b> 13:22
8:19	15:18 18:19,23	<b>Elections</b> 3:19	<b>finally</b> 8:12	<b>going</b> 4:24 5:10
<b>correct</b> 10:4,7	<b>Diplomate</b> 1:23	<b>email</b> 4:16	<b>financially</b>	5:13,23 6:4,21
19:6 21:19	24:22	<b>employee</b> 24:12	24:13	7:5,18,23 8:4
22:7,8 24:16	<b>direction</b> 24:7		<b>fine</b> 13:20	12:17 16:14
<b>corrections</b> 25:4	<b>discuss</b> 5:13	<b>engagement</b>	<b>finish</b> 4:18 8:7	18:3 20:16
<b>counsel</b> 13:1	<b>Discussion</b> 4:3	12:3	<b>Firm</b> 2:21,22	22:13,18,23
24:12,13,17	<b>displayed</b> 20:17	<b>especially</b> 6:22	6:11	23:13,20
<b>County</b> 24:3	20:25	<b>Esplanade</b> 2:5	<b>first</b> 5:24 13:22	<b>good</b> 5:6 6:12
<b>couple</b> 6:24	<b>district</b> 1:3,3	<b>et</b> 1:5 2:8 25:20	15:13 16:9	10:17 23:22
<b>court</b> 1:3 6:25	3:20 10:20,22	25:20	22:1	<b>government</b>
7:14 20:6 24:4	17:22 18:5,16	<b>ethnicity</b> 12:22	<b>five</b> 13:9 17:6	12:9,10
<b>current</b> 9:23	19:3,20,23,24	<b>everybody</b> 4:9	<b>five-minute</b> 17:1	<b>graduate</b> 11:1
10:19,20 15:12	20:13 21:19	4:22 21:2	<b>fixing</b> 4:12	<b>great</b> 17:3
19:4	22:1,7,16	<b>exact</b> 13:24	<b>follow</b> 13:25	<b>ground</b> 5:23
<b>currently</b> 4:11	25:21	<b>exactly</b> 16:1	14:1	<b>group</b> 15:17,18
10:8 12:2 22:6	<b>Division</b> 3:4	18:20 23:1	<b>following</b> 25:3	<b>groups</b> 12:4
<b>customer</b> 12:16	<b>documents</b> 8:22	<b>examination</b>	<b>follows</b> 4:7	<b>guess</b> 13:10
<b>CVAP</b> 18:3,4	9:4,6	1:16 3:10	<b>foregoing</b> 24:6	21:11
	<b>doing</b> 6:6 11:12	24:10,14,17	24:17 25:2	<b>guideline</b> 24:18
	11:15,19 13:25	<b>examined</b> 24:7	<b>form</b> 24:7	<b>guys</b> 18:21
<b>D</b>	<b>Dora</b> 5:19,20,20	<b>example</b> 14:3	<b>format</b> 24:18	
<b>Date</b> 25:18,22	5:21 21:15	<b>exception</b> 25:3	<b>Fourth</b> 10:15	<b>H</b>
<b>day</b> 24:20	23:13,21	<b>exceptions</b> 24:17	<b>friend</b> 16:5	<b>H</b> 3:17
<b>days</b> 4:11	<b>drawn</b> 19:7	<b>exhibit</b> 20:19,24	<b>front</b> 4:9 12:16	<b>hand</b> 7:7 16:24
<b>DC</b> 2:13	<b>drew</b> 13:21	20:25	<b>full</b> 5:14 24:16	24:19
<b>December</b> 1:19	<b>duly</b> 24:14	<b>existence</b> 13:7	<b>fully</b> 8:13,15	<b>happen</b> 15:1
4:1 24:20		<b>experience</b>	<b>function</b> 6:4	<b>happened</b> 16:11
25:22		12:18	<b>further</b> 24:7,9	16:16,18 19:17
<b>DEFENDANT</b>	<b>E</b>	<b>explain</b> 13:18	24:11,14,15	<b>HARLESS</b> 2:10
3:2	<b>E</b> 2:1,1 3:17 5:4	14:14 19:7,9		<b>head</b> 7:10
<b>Defendants</b> 1:10	24:1,1	23:10	<b>G</b>	<b>heads</b> 7:6
<b>degree</b> 11:7,7,9	<b>East</b> 2:5	<b>eyesight</b> 6:18	<b>G</b> 1:12	<b>hear</b> 13:22
<b>Democrat</b> 15:2	<b>Eddie</b> 13:1		<b>general</b> 3:3,4,19	<b>heard</b> 13:8,11
<b>denied</b> 14:19	<b>Eddie@Morfi...</b>		5:11 9:14	13:14
<b>deposed</b> 5:20	2:24	<b>F</b>	21:21	<b>hearing</b> 23:20
<b>deposition</b> 1:16	<b>education</b> 12:7	<b>F</b> 24:1	<b>Gersten</b> 1:22	<b>hearings</b> 14:4
4:17 6:4,15,19	<b>Edwardo</b> 2:22	<b>fair</b> 18:2	24:22 25:23	<b>held</b> 14:4
8:20 9:9 23:14	6:10,12	<b>familiar</b> 17:24	<b>gestures</b> 7:7	<b>Heliodora</b> 1:17
23:21,24 24:6	<b>effect</b> 7:13	<b>felt</b> 22:24	<b>getting</b> 7:7	3:11 4:4 5:16
24:8,10,11,15	<b>effective</b> 24:23	<b>Fifth</b> 3:5	<b>give</b> 6:23 7:1	25:2,20
25:2,3	<b>either</b> 11:18	<b>figure</b> 22:14	<b>given</b> 18:9 24:8	<b>help</b> 6:25
<b>depositions</b> 4:20	12:9 14:19	<b>filed</b> 18:23	<b>go</b> 8:9 10:24	<b>hereunto</b> 24:19
<b>Deschutes</b> 2:23	<b>elect</b> 22:24	<b>filing</b> 9:1	16:17 17:1	<b>high</b> 10:24,25
<b>DESCRIPTI...</b>	<b>electing</b> 19:8	<b>final</b> 15:10		

<p><b>highlighting</b> 21:25  <b>Hispanic</b> 17:20 18:10,12  <b>Hobbs</b> 1:8 18:22 25:20  <b>Holtzman</b> 2:4 5:7  <b>honestly</b> 13:24 16:1,12,16 22:11  <b>hope</b> 4:12  <b>hoping</b> 8:4  <b>hot</b> 4:15  <b>HUGHES</b> 3:3 5:2  <b>husband</b> 13:2</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/> <p><b>I-R-V-I-N-G</b> 10:2  <b>identified</b> 20:25  <b>identify</b> 12:19 12:21 18:11  <b>impression</b> 15:13  <b>including</b> 24:16  <b>INDEX</b> 3:10  <b>indicated</b> 24:8  <b>individual</b> 17:12 17:14 19:11  <b>information</b> 12:18 13:8,11 14:1,7,8  <b>informed</b> 13:18  <b>instructs</b> 7:23  <b>interested</b> 24:13  <b>internet</b> 4:10  <b>Intervenor-De...</b> 1:14 2:3 5:8  <b>introduced</b> 3:18 12:25  <b>involved</b> 12:4 13:12 15:24 16:2,3,9</p>	<p><b>involvement</b> 11:18  <b>Irving</b> 9:24 10:2  <b>ISMAEL</b> 1:12  <b>issues</b> 4:19  <b>IV</b> 2:5</p> <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <p><b>Jeanne</b> 1:22 20:7,18 21:6 23:22 24:22 25:23  <b>Jeanne@Lake...</b> 1:24 25:24  <b>JOSE</b> 1:12  <b>July</b> 9:4,5</p> <hr/> <p style="text-align: center;"><b>K</b></p> <hr/> <p><b>keep</b> 4:16 5:10  <b>Kennewick</b> 2:23  <b>King</b> 24:3  <b>know</b> 4:8 5:24 6:3 7:6,17 8:4 9:3,12 12:21 13:17,19 14:20 14:22 15:1,3,5 16:11 17:17,23 18:17  <b>knowledge</b> 25:3</p> <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <p><b>Lake</b> 11:5  <b>LAKESIDE</b> 1:22 25:23  <b>Lane</b> 10:15  <b>Latino</b> 11:21  <b>Law</b> 2:21,22 6:11  <b>lawsuit</b> 13:12 15:22,25 16:8 16:14 18:22  <b>lay</b> 5:23  <b>learned</b> 16:2  <b>learning</b> 14:2  <b>leave</b> 22:18  <b>LEEPER</b> 2:9</p>	<p>4:23 5:1 21:3 23:11  <b>left</b> 17:10  <b>LEGAL</b> 2:8,12  <b>legislative</b> 3:20 10:20,22 14:17 17:22 18:4,16 19:19,23,23 20:13 21:19,25 22:6,16 23:9  <b>level</b> 13:19 22:15  <b>License</b> 24:23  <b>LINE</b> 25:5  <b>listed</b> 25:4  <b>Litigation</b> 3:4  <b>little</b> 12:17  <b>live</b> 10:8,20 19:14  <b>lived</b> 9:12,14,15  <b>local</b> 12:10,11  <b>long</b> 8:5 9:13 11:15 16:12  <b>look</b> 17:14  <b>looking</b> 19:10  <b>looks</b> 4:18  <b>Los</b> 2:19  <b>lose</b> 4:13  <b>love</b> 7:2</p> <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <p><b>M</b> 1:22 5:4 24:22 25:23  <b>management</b> 11:10  <b>manner</b> 24:10  <b>map</b> 15:10,12,14 15:15,19,21 16:8,9,13 17:11,12,21 19:4,7  <b>maps</b> 13:22 14:18 16:23 17:13,15,17  <b>matter</b> 5:8</p>	<p><b>means</b> 18:10  <b>medication</b> 8:12 8:17  <b>meet</b> 6:12  <b>memory</b> 10:17  <b>Mexican</b> 12:23 12:24  <b>middle</b> 8:8  <b>midterm</b> 20:1  <b>midterms</b> 19:17  <b>minute</b> 16:20 21:8  <b>minutes</b> 17:7  <b>Morfin</b> 1:17 2:21,22,22 3:11 4:4 5:6,16 6:10,10,11 13:1 20:25 25:2,20  <b>morning</b> 5:6  <b>motions</b> 24:17  <b>moved</b> 9:16  <b>MULJI</b> 2:10  <b>municipality</b> 12:11,12  <b>mute</b> 6:3</p> <hr/> <p style="text-align: center;"><b>N</b></p> <hr/> <p><b>N</b> 2:1 5:4,4  <b>name</b> 5:6,14  <b>named</b> 24:6  <b>names</b> 14:23 15:7  <b>nearby</b> 10:12  <b>need</b> 8:3,6 15:9 16:21  <b>nod</b> 7:6  <b>Nodded</b> 4:23  <b>nodding</b> 7:9  <b>nonpartisan</b> 15:4  <b>normal</b> 7:6  <b>Northwest</b> 2:12  <b>noted</b> 4:8 24:11  <b>November</b> 3:19</p>	<p>20:15 21:21  <b>number</b> 3:18 15:4</p> <hr/> <p style="text-align: center;"><b>O</b></p> <hr/> <p><b>O</b> 5:4  <b>oath</b> 4:5 7:11,13  <b>oaths</b> 24:5  <b>object</b> 7:24 23:11  <b>objection</b> 4:21 7:25  <b>objections</b> 7:1,3 7:4 24:9,17  <b>objects</b> 7:21  <b>office</b> 4:11 11:10 12:16  <b>official</b> 1:8  <b>Oh</b> 16:24 20:10  <b>okay</b> 4:8,22 5:3 5:17,23 6:3,6,7 6:17,21 7:13 7:16,21 8:3,12 8:18,22,25 9:3 9:8,11,18,23 10:4,9,13,23 11:1,11,23,25 12:3,6,15,17 13:6,14,20,25 14:3,6,10,14 14:23 15:1,9 15:13,21,24 16:4,7,13,19 16:23 17:1,9 17:17,24 18:2 18:7,18 19:4 19:10,15 20:1 20:10,16,23 21:1,6,14,18 21:24 22:9,13 22:14,23 23:4 23:17  <b>once</b> 16:2  <b>open</b> 4:17 6:13  <b>opinion</b> 18:3</p>
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<p><b>opportunity</b> 19:12 23:2,6 24:8</p> <p><b>opposed</b> 7:9</p> <p><b>ORAL</b> 1:16</p> <p><b>order</b> 16:11</p> <p><b>outages</b> 4:10</p> <p><b>outcome</b> 24:13</p> <hr/> <p style="text-align: center;"><b>P</b></p> <hr/> <p><b>P</b> 2:1,1</p> <p><b>page</b> 2:25 3:11 25:5</p> <p><b>painless</b> 5:10</p> <p><b>Palmer</b> 1:5 2:8 25:20</p> <p><b>park</b> 4:11</p> <p><b>part</b> 13:3,4</p> <p><b>parties</b> 24:9,12</p> <p><b>party</b> 24:11</p> <p><b>Pasco</b> 9:15,15,20 9:21,24 10:3,5 10:6,8,13,16 10:25,25 13:9 13:12,15</p> <p><b>passed</b> 15:11 16:8</p> <p><b>pause</b> 6:24</p> <p><b>pending</b> 8:8</p> <p><b>people</b> 14:18 18:11</p> <p><b>percentage</b> 17:21 18:7,15</p> <p><b>Perfect</b> 5:3</p> <p><b>person</b> 19:3</p> <p><b>personal</b> 12:18</p> <p><b>Personally</b> 14:13</p> <p><b>PHILLIPS</b> 2:11</p> <p><b>Phoenix</b> 2:6</p> <p><b>phones</b> 6:17</p> <p><b>Plaintiffs</b> 1:6 2:8 2:16,21</p> <p><b>plaintiffs'</b> 13:1</p> <p><b>plan</b> 5:11</p>	<p><b>please</b> 5:14 7:16 10:1 16:25</p> <p><b>PLLC</b> 2:22</p> <p><b>point</b> 9:1 11:17 16:9</p> <p><b>political</b> 11:18 11:19 12:3</p> <p><b>population</b> 17:21,25 18:4 18:9,10,11</p> <p><b>possible</b> 5:11</p> <p><b>prefer</b> 5:17</p> <p><b>preparation</b> 24:18</p> <p><b>prepare</b> 8:20</p> <p><b>prepared</b> 24:18</p> <p><b>preserves</b> 4:21</p> <p><b>prevents</b> 19:7</p> <p><b>previous</b> 4:20 13:8,10,14</p> <p><b>previously</b> 10:13 19:22</p> <p><b>problem</b> 4:12</p> <p><b>proceedings</b> 4:1 4:2 7:22</p> <p><b>process</b> 14:10,12 14:15</p> <p><b>professional</b> 12:6</p> <p><b>professionally</b> 11:9</p> <p><b>Project</b> 2:16,18</p> <p><b>proposed</b> 15:15 17:11,12,13,15 17:18</p> <p><b>provided</b> 14:8</p> <p><b>public</b> 2:18 14:4</p> <p><b>publicly</b> 14:6</p> <p><b>pursuant</b> 24:4 24:18</p> <p><b>put</b> 14:7 21:7,8</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>qualifications</b> 24:10</p>	<p><b>question</b> 7:25 8:7 18:6</p> <p><b>questions</b> 5:12 6:25 7:16 8:8 8:14,16 14:12 23:18 24:16</p> <p><b>quick</b> 20:24</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>R</b> 2:1 24:1</p> <p><b>R.W</b> 3:3</p> <p><b>race</b> 12:19 19:20 20:13 22:1,4</p> <p><b>races</b> 19:23 22:20</p> <p><b>RCW</b> 24:4</p> <p><b>RDR</b> 1:22 24:22 25:23</p> <p><b>read</b> 25:2</p> <p><b>real</b> 20:24</p> <p><b>really</b> 12:8 13:17,18 14:1 16:6 18:20</p> <p><b>reason</b> 8:15 25:5</p> <p><b>recall</b> 10:9,11,11 10:14 14:23</p> <p><b>reconvene</b> 17:6</p> <p><b>record</b> 4:3,10 5:14 7:8 17:9 23:22 24:9</p> <p><b>recording</b> 5:25</p> <p><b>redistricting</b> 12:7 13:7,13 13:16,21 14:10 14:15</p> <p><b>reduced</b> 24:7</p> <p><b>reestablish</b> 4:14</p> <p><b>Registered</b> 1:23 24:22</p> <p><b>relation</b> 13:4</p> <p><b>relative</b> 24:11 24:12</p> <p><b>released</b> 14:6</p> <p><b>remember</b> 13:24 16:1,4,6,12</p>	<p>17:16 22:11,22 23:1</p> <p><b>Remote</b> 1:16 4:1</p> <p><b>repeat</b> 20:6,8</p> <p><b>rephrase</b> 18:7 22:17</p> <p><b>Reported</b> 1:22 25:23</p> <p><b>reporter</b> 1:23 6:25 9:25 20:6 20:8,21 21:4,9 21:14 24:4,22</p> <p><b>REPORTING</b> 1:22 25:23</p> <p><b>represent</b> 5:8 19:11</p> <p><b>representative</b> 1:13 19:13,15 20:4,5,11,14 23:3</p> <p><b>represented</b> 19:2</p> <p><b>represents</b> 19:3 19:8</p> <p><b>Republican</b> 15:2</p> <p><b>request</b> 20:6</p> <p><b>reschedule</b> 4:17</p> <p><b>reserved</b> 23:25</p> <p><b>reside</b> 22:6</p> <p><b>Residing</b> 24:24</p> <p><b>resolve</b> 4:18</p> <p><b>resolved</b> 8:9</p> <p><b>response</b> 23:19</p> <p><b>responses</b> 7:5</p> <p><b>review</b> 8:22 14:6 15:10 16:23 24:8</p> <p><b>reviewed</b> 8:25 9:4,6</p> <p><b>right</b> 4:24 5:20 8:18 11:8,11 11:13 16:7,10 16:20 21:10,13 21:18,24,24 22:25 23:6</p>	<p><b>Rights</b> 2:16,18</p> <p><b>Road</b> 2:5</p> <p><b>role</b> 12:15</p> <p><b>room</b> 6:8</p> <p><b>rules</b> 5:23</p> <p><b>rush</b> 16:19</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>S</b> 2:1</p> <p><b>saw</b> 15:13 16:9 16:24</p> <p><b>says</b> 21:18,25</p> <p><b>school</b> 10:24</p> <p><b>screen</b> 20:24 21:13 22:13</p> <p><b>screenshot</b> 3:19 20:19,21,22 21:5</p> <p><b>seat</b> 22:10</p> <p><b>Seattle</b> 3:5 9:16 10:5,10 11:6 24:24 25:21</p> <p><b>seconds</b> 6:24</p> <p><b>Secretary</b> 1:8 18:22 21:15</p> <p><b>see</b> 4:14 21:13 21:18,23 22:2 22:4,9</p> <p><b>seeing</b> 21:16</p> <p><b>seen</b> 15:21 16:13 20:13 22:10</p> <p><b>senator</b> 19:19 21:25 22:12</p> <p><b>send</b> 4:16 20:19 21:12</p> <p><b>sense</b> 7:19 8:1 18:13</p> <p><b>service</b> 12:16</p> <p><b>set</b> 9:4,5 23:9 24:19</p> <p><b>shake</b> 7:6</p> <p><b>shaking</b> 7:9</p> <p><b>share</b> 20:24</p> <p><b>sharing</b> 22:13</p>
--	---	--	---	---

<b>SHEET</b> 25:1 <b>short</b> 5:10 <b>sign</b> 24:8 <b>Signature</b> 23:25 25:18 <b>signing</b> 24:9 <b>silence</b> 4:25 <b>SIMONE</b> 2:9 <b>simple</b> 7:8 <b>SLeeper@Ca...</b> 2:13 <b>small</b> 16:25 <b>SONNI</b> 2:17 <b>Sonni@UCL...</b> 2:19 <b>sorry</b> 15:8 20:7 <b>Soto</b> 1:5 2:8 25:20 <b>South</b> 10:15 <b>specific</b> 13:15 <b>specifically</b> 7:22 12:7 <b>specifics</b> 5:13 <b>spoken</b> 9:8 <b>spot</b> 4:15 <b>SS</b> 24:2 <b>start</b> 5:11 <b>started</b> 5:24 15:22 16:8 <b>state</b> 1:8,9,13 3:2 5:14 12:9 13:16,22 14:15 18:21 19:19 20:13 21:25 22:10,12,15 24:2,5 <b>State's</b> 21:15 <b>STATES</b> 1:3 <b>stenographer</b> 5:25 <b>stenographica...</b> 24:6 <b>STEVEN</b> 1:8 <b>stop</b> 22:13 <b>street</b> 2:12 9:24	9:25 10:3 <b>streets</b> 10:12 <b>Strike</b> 22:16,18 <b>stuff</b> 8:5 <b>submit</b> 14:11 <b>sued</b> 18:21,21 <b>suggested</b> 15:17 15:18,20 <b>Suite</b> 2:5,12,23 3:5 <b>super</b> 8:5 <b>sure</b> 7:2,9 18:20 21:11 <b>SUSAN</b> 1:5 <b>switch</b> 12:17 <b>sworn</b> 24:14 <b>sworn/affirmed</b> 4:5 <hr/> <b>T</b> <b>T</b> 3:17 5:4 24:1 24:1 <b>tablets</b> 6:17 <b>take</b> 4:24 8:3 9:13 16:19,25 20:21 <b>taken</b> 20:22 24:6 24:17 <b>talk</b> 6:22 23:15 <b>talked</b> 12:24 <b>talking</b> 8:23 17:10 19:15 <b>Technical</b> 11:5 <b>tell</b> 4:5 17:20 18:19,25 20:3 <b>telling</b> 22:23 <b>tells</b> 18:8 <b>ten</b> 9:12,16 <b>term</b> 17:24 <b>testified</b> 4:6 <b>testify</b> 24:14 <b>testimony</b> 24:16 <b>thank</b> 5:3,9 8:18 10:18 17:5 21:6 23:21	<b>Thanks</b> 17:4 <b>thereof</b> 24:13 <b>thing</b> 8:5,6 <b>things</b> 6:17 <b>think</b> 9:13 12:5 12:24 16:17,20 18:25 19:1,4 23:22 <b>time</b> 4:18 5:9 7:1 8:3,23 9:13,13 11:17 13:24 16:10,12,21 23:21 24:10,17 <b>today</b> 4:12,22 5:9 7:3,11,21 8:12,16 9:9 23:14 <b>today's</b> 8:20 <b>totally</b> 8:6 <b>Tower</b> 2:5 <b>training</b> 11:4 12:6 <b>transcribed</b> 24:8 24:16 <b>transcript</b> 24:16 24:18 <b>TREVINO</b> 1:12 <b>Tri-Cities</b> 9:17 9:18 10:5,6 <b>true</b> 24:16 25:3 <b>truly</b> 16:12 <b>truth</b> 4:5,6,6 24:14,15,15 <b>truthfully</b> 8:14 8:16 <b>try</b> 5:10 7:17 16:22 18:7 <b>Tuesday</b> 1:19 <b>two</b> 11:16,17 18:18,23 20:3 22:5,6,9 <b>typewritten</b> 24:7 <hr/> <b>U</b> <b>UCLA</b> 2:16,18	<b>unclear</b> 7:16 <b>undersigned</b> 24:4 25:2 <b>understand</b> 7:11 7:14 8:5 10:4 14:15 16:7 <b>understanding</b> 18:6 <b>understood</b> 7:18 <b>UNITED</b> 1:3 <b>USDC</b> 25:21 <b>use</b> 6:5,14,18 <hr/> <b>V</b> <b>v</b> 1:7 25:20 <b>values</b> 19:3,8,10 <b>verbatim</b> 23:1 <b>versus</b> 15:2 <b>vicinities</b> 9:14 <b>vocational</b> 11:4 <b>Vogel</b> 2:4 5:7 <b>voice</b> 7:3 <b>volunteer</b> 11:19 <b>volunteered</b> 11:21 <b>vote</b> 14:19 18:11 19:16,19,20 20:1 22:11,15 22:18,20 <b>voted</b> 19:22 20:3 <b>voting</b> 2:16,18 3:19 17:20,24 18:4,8,10 <hr/> <b>W</b> <b>wait</b> 4:13 21:11 <b>waived</b> 24:9 <b>WAKNIN</b> 2:17 <b>walk</b> 9:11 <b>WALKER</b> 2:11 <b>want</b> 4:9 16:19 21:9 23:15 <b>wanted</b> 5:9 20:8 <b>Washington</b> 1:3 1:9,9 2:13,23	3:2,4,5 9:15,24 10:3,16,25 11:5 14:16 18:22 24:2,4,5 24:18,23,24 25:21 <b>wasn't</b> 20:9 <b>way</b> 23:9 <b>we'll</b> 6:23 7:2,3 17:6 21:11 <b>we're</b> 4:11 6:5 6:21 23:13,22 <b>we've</b> 4:20 <b>website</b> 20:17 21:16 <b>week</b> 9:7 <b>weeks</b> 9:6,7 19:17 <b>welcome</b> 10:19 <b>went</b> 10:25 11:6 <b>West</b> 2:23 9:24 <b>Western</b> 1:3 25:21 <b>WHEREOF</b> 24:19 <b>wish</b> 23:14 <b>witness</b> 10:2 17:3,5 24:6,7,9 24:14,19 25:20 <b>wondering</b> 18:24 <b>words</b> 18:25 <b>work</b> 4:15 8:10 12:17 14:15 17:2 <b>worked</b> 11:10 12:9,11 <b>working</b> 4:11 12:12 <b>wouldn't</b> 18:2 19:9 <hr/> <b>X</b> <b>X</b> 3:17 5:4
---	--	---	---	---

<b>Y</b>	<b>365-3376</b> 1:23			
<b>YBARRA</b> 1:13	25:24			
<b>Yeah</b> 16:25 17:3	<b>4</b>			
<b>year</b> 11:1	<b>400</b> 2:12			
<b>years</b> 9:12,16,17 11:16,17 13:9	<b>5</b>			
<b>Z</b>	<b>5</b> 3:12			
<b>Zoom</b> 6:3,15,21	<b>5.28.010</b> 24:4			
<b>0</b>	<b>6</b>			
	<b>6</b> 1:19 4:1 25:22			
<b>1</b>	<b>7</b>			
<b>1</b> 3:19 20:24,25	<b>7325</b> 2:23			
<b>1101</b> 2:12	<b>8</b>			
<b>1115</b> 9:24	<b>8</b> 3:19			
<b>11th</b> 24:20	<b>800</b> 3:5			
<b>14th</b> 2:12	<b>816</b> 10:15			
<b>15</b> 3:20 10:22,23	<b>833</b> 1:23 25:24			
18:5 19:20	<b>85016</b> 2:6			
20:13 21:19	<b>860</b> 2:5			
22:1,7,16	<b>8th</b> 21:21			
<b>15th</b> 17:22 18:16	<b>9</b>			
<b>1993</b> 11:2	<b>9:06</b> 1:19 4:2			
<b>2</b>	<b>9:25</b> 17:8			
<b>2</b> 24:23	<b>9:37</b> 17:8			
<b>20</b> 3:19	<b>9:49</b> 1:19 23:24			
<b>2000</b> 3:5	<b>90095</b> 2:19			
<b>20005</b> 2:13	<b>98104</b> 3:5			
<b>2009</b> 11:24	<b>99301</b> 9:24 10:3			
<b>2022</b> 1:19 3:19	10:16			
4:1 19:17 20:1	<b>99336</b> 2:23			
21:21 24:20				
25:22				
<b>2023</b> 24:23				
<b>2575</b> 2:5				
<b>2711</b> 1:22 24:23				
25:23				
<b>3</b>				
<b>3:22-cv-05035...</b>				
1:9 25:21				
<b>308-14-135</b>				
24:18				
<b>3250</b> 2:18				