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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 NOTICE OF  
CONFLICT AFFIDAVITS  
REQUESTED BY COURT

Plaintiff Benancio Garcia III respectfully, and at the request of this Court during the  
March 7, 2023 oral argument (Dkt. #42) on Defendant’s Motion for Inquiry Concerning  
Potential Conflicts of Interest, hereby submits Conflict Affidavits of Benancio Garcia III, Jose  
Trevino, Alejandro Ybarra and Ismael Campos, attached hereto as Exhibits 1-4, respectively.

1 DATED this 9<sup>th</sup> day of March, 2023.

Respectfully submitted,

2 *s/ Andrew R. Stokesbary*

3 Andrew R. Stokesbary, WSBA No. 46097  
4 CHALMERS, ADAMS, BACKER & KAUFMAN,  
5 LLC

6 701 Fifth Avenue, Suite 4200

7 Seattle, WA 98104

8 T: (206) 207-3920

9 [dstokesbary@chalmersadams.com](mailto:dstokesbary@chalmersadams.com)

10 Jason B. Torchinsky (admitted pro hac vice)

11 Phillip M Gordon (admitted pro hac vice)

12 HOLTZMAN VOGEL BARAN

13 TORCHINSKY & JOSEFIK PLLC

14 15405 John Marshall Hwy

15 Haymarket, VA 20169

16 T: (540) 341-8808

17 [jtorchinsky@holtzmanvogel.com](mailto:jtorchinsky@holtzmanvogel.com)

18 [pgordon@holtzmanvogel.com](mailto:pgordon@holtzmanvogel.com)

19 Dallin B. Holt (admitted pro hac vice)

20 HOLTZMAN VOGEL BARAN

21 TORCHINSKY & JOSEFIK PLLC

22 Esplanade Tower IV

23 2575 East Camelback Rd

24 Suite 860

25 Phoenix, AZ 85016

26 T: (540) 341-8808

[dholt@holtzmanvogel.com](mailto:dholt@holtzmanvogel.com)

*Counsel for Plaintiff*

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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 9th day of March, 2023.

Respectfully submitted,

/s/ Andrew R. Stokesbary  
Andrew R. Stokesbary, WSBA #46097

*Counsel for Plaintiff*

# EXHIBIT 1

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

BENANCIO GARCIA III,

*Plaintiff,*

v.

STEVEN HOBBS, in his official capacity  
as Secretary of State of Washington, et al.,

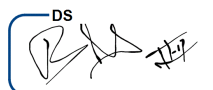
*Defendants.*

**DECLARATION OF BENANCIO GARCIA III**

Case No. 3:22-cv-5152-RSL-DGE-LJCV

Comes Benancio Garcia III, Plaintiff in the above-listed matter, and states as follows:

1. I am the Plaintiff in the matter of *Garcia. v. Hobbs, et al.* I am a resident of Grandview, Washington. I am a United States citizen and am over the age of 18.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I have reviewed the State of Washington’s Motion for Inquiry Concerning Potential Conflicts of Interest (the “Motion”). In response to the Motion, I wish to make the following statement.
4. As my Complaint says, I believe that the State Redistricting Commission created the current Washington State Legislative District 15 by predominantly relying on race. Because of that, I want Legislative District 15 to be redrawn in a race-neutral manner.
5. I also believe that the Voting Rights Act does not mandate a majority-minority district in the Yakima Valley.



6. I am now, and have been, aware of the pending matter of *Palmer, et al. v. Hobbs, et al.*, and do not feel that the position of the Intervenor-Defendants in that case (that the Voting Rights Act does not mandate the creation of majority-minority district in the Yakima Valley) conflicts with my desires in this case.

7. I do not believe there is any conflict between these cases. To the extent there is any conflict between the two cases, I have previously, and do now, expressly waive it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of March, 2023.

DocuSigned by:  
  
DE2C1E8043AF480...  
By: Benancio Garcia III

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	nil
	Haymarket, VA 20169
	snorwood@holtzmanvogel.com
	IP Address: 96.255.222.33

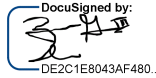
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**Signer Events**

Benancio Garcia III  
 garciabenancio@yahoo.com  
 Security Level: Email, Account Authentication (None)

**Signature**



Signature Adoption: Drawn on Device  
 Using IP Address: 71.94.28.110  
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Dallin Holt  
 dholt@holtzmanvogel.com  
 Security Level: Email, Account Authentication (None)



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Drew Stokesbary, Esq.  
 dstokesbary@chalmersadams.com  
 Security Level: Email, Account Authentication (None)



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**Electronic Record and Signature Disclosure**



# EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSAN SOTO PALMER et al.,

*Plaintiffs,*

v.

STEVEN HOBBS, in his official capacity  
as Secretary of State of Washington, et al.,

*Defendants,*

and

JOSE TREVINO, ISMAEL G. CAMPOS,  
and State Representative ALEX  
YBARRA,

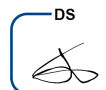
*Intervenor-Defendants.*

**DECLARATION OF JOSE TREVINO**

Case No. 3:22-cv-5035-RSL

Comes Jose Trevino, Intervenor-Defendant in the above-listed matter, and states as follows:

1. I am an Intervenor-Defendant in the matter of *Palmer, et al. v. Hobbs, et al.* I am a resident of Granger, Washington. I am a United States citizen and am over the age of 18.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I have reviewed the State of Washington’s Motion for Inquiry Concerning Potential Conflicts of Interest (the “Motion”). In response to the Motion, I wish to make the following statement.



4. I believe that the Voting Rights Act does not mandate a majority-minority district in the Yakima Valley.

5. I do not believe that a new Legislative District 15 map needs to be drawn because of the Voting Rights Act.

6. However, if the Court in the *Garcia* matter finds that race predominated in the Commission's drawing of Legislative District 15, I believe it is important that District 15 be redrawn in a race-neutral manner.

7. I am fully aware of the pending matter of *Garcia v. Hobbs, et al.*, and do not feel that the relief requested in that matter (that the legislative district map be drawn in a race-neutral manner) conflicts with my desires.

8. To the extent there is any conflict between the two cases, I have previously, and do now, expressly waive it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of March, 2023.

DocuSigned by:



0A914DBDE3D6472...

By: Jose Trevino

**Certificate Of Completion**

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	Haymarket, VA 20169
	snorwood@holtzmanvogel.com
	IP Address: 96.255.222.33

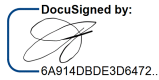
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Jose Trevino  
 jtrevino1970@hotmail.com  
 Security Level: Email, Account Authentication (None)

**Signature**



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**Timestamp**

Dallin Holt  
 dholt@holtzmanvogel.com  
 Security Level: Email, Account Authentication (None)



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Drew Stokesbary, Esq.  
 dstokesbary@chalmersadams.com  
 Security Level: Email, Account Authentication (None)



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# EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSAN SOTO PALMER et al.,

*Plaintiffs,*

v.

STEVEN HOBBS, in his official capacity  
as Secretary of State of Washington, et al.,

*Defendants,*

and

JOSE TREVINO, ISMAEL G. CAMPOS,  
and State Representative ALEX  
YBARRA,

*Intervenor-Defendants.*

**DECLARATION OF ALEJANDRO  
YBARRA**

Case No. 3:22-cv-5035-RSL

Comes Alejandro (“Alex”) Ybarra, Intervenor-Defendant in the above-listed matter, and states as follows:

1. I am an Intervenor-Defendant in the matter of *Palmer, et al. v. Hobbs, et al.* I am a resident of Quincy, Washington. I am a United States citizen and am over the age of 18.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I have reviewed the State of Washington’s Motion for Inquiry Concerning Potential Conflicts of Interest (the “Motion”). In response to the Motion, I wish to make the following statement.

4. I believe that the Voting Rights Act does not mandate a majority-minority district in the Yakima Valley.


5. I do not believe that a new Legislative District 15 map needs to be drawn because of the Voting Rights Act.

6. However, if the Court in the *Garcia* matter finds that race predominated in the Commission's drawing of Legislative District 15, I believe it is important that District 15 be redrawn in a race-neutral manner.

7. I am fully aware of the pending matter of *Garcia v. Hobbs, et al.*, and do not feel that the relief requested in that matter (that the legislative district map be drawn in a race-neutral manner) conflicts with my desires.

8. To the extent there is any conflict between the two cases, I have previously, and do now, expressly waive it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of March, 2023.

DocuSigned by:  
  
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By: Alejandro ("Alex") Ybarra



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Alex Ybarra  
 Quincyroo@yahoo.com  
 Security Level: Email, Account Authentication (None)

**Signature**

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**Carbon Copy Events**

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**Timestamp**

Dallin Holt  
 dholt@holtzmanvogel.com  
 Security Level: Email, Account Authentication (None)

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**Electronic Record and Signature Disclosure:**  
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Drew Stokesbary, Esq.  
 dstokesbary@chalmersadams.com  
 Security Level: Email, Account Authentication (None)

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**Electronic Record and Signature Disclosure**

# EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSAN SOTO PALMER et al.,

*Plaintiffs,*

v.

STEVEN HOBBS, in his official capacity  
as Secretary of State of Washington, et al.,

*Defendants,*

and

JOSE TREVINO, ISMAEL G. CAMPOS,  
and State Representative ALEX  
YBARRA,

*Intervenor-Defendants.*

**DECLARATION OF ISMAEL CAMPOS**

Case No. 3:22-cv-5035-RSL

Comes Ismael Campos, Intervenor-Defendant in the above-listed matter, and states as follows:

1. I am an Intervenor-Defendant in the matter of *Palmer, et al. v. Hobbs, et al.* I am a resident of Kennewick, Washington. I am a United States citizen and am over the age of 18.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I have reviewed the State of Washington’s Motion for Inquiry Concerning Potential Conflicts of Interest (the “Motion”). In response to the Motion, I wish to make the following statement.

4. I believe that the Voting Rights Act does not mandate a majority-minority district in the Yakima Valley.

5. I do not believe that a new Legislative District 15 map needs to be drawn because of the Voting Rights Act.

6. However, if the Court in the *Garcia* matter finds that race predominated in the Commission's drawing of Legislative District 15, I believe it is important that District 15 be redrawn in a race-neutral manner.

7. I am fully aware of the pending matter of *Garcia v. Hobbs, et al.*, and do not feel that the relief requested in that matter (that the legislative district map be drawn in a race-neutral manner) conflicts with my desires.

8. To the extent there is any conflict between the two cases, I have previously, and do now, expressly waive it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of March, 2023.

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By: Ismael Campos

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Mel Campos  
 Mel@tudecidesmedia.com  
 Security Level: Email, Account Authentication (None)

**Signature**

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**Carbon Copy Events**

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Dallin Holt  
 dholt@holtzmanvogel.com  
 Security Level: Email, Account Authentication (None)

**COPIED**

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**Electronic Record and Signature Disclosure:**

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Drew Stokesbary, Esq.  
 dstokesbary@chalmersadams.com  
 Security Level: Email, Account Authentication (None)

**COPIED**

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