

Exhibit F

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

THE CHRISTIAN MINISTERIAL

ALLIANCE, ET AL.,

Plaintiff,

-vs-

Case No. 4:23-cv-471-DPM-DRS-JM

JOHN THURSTON, in his official

capacity as the Secretary of

State of Arkansas,

Defendant.

VIDEO RECORDED DEPOSITION OF FRED HEJAZI

TAKEN ON BEHALF OF THE PLAINTIFFS

ON SEPTEMBER 10, 2024, BEGINNING AT 9:08 A.M.

VIA ZOOM

APPEARANCES

on behalf of the PLAINTIFF

Mr. Michael Pierce (Via Zoom)

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(Appearances continued on next page.)

REPORTED BY: Shannon S. Harwood, CSR, RPR, CRR

<p>1 (Appearances continued.) 2 Mr. Michael Goldstein (Via Zoom) O'MELVENY & MYERS 3 1301 Avenue of the Americas Suite 1700 4 New York, New York 10019 (212) 326-2000 5 mgoldstein@omm.com 6 Ms. Leah C. Aden (Via Zoom) 7 LEGAL DEFENSE FUND 40 Rector Street 8 Fifth Floor New York, New York 10006 9 (212) 965-7715 laden@naacpldf.org 10 Ms. Arkie Byrd (Via Zoom) 11 MAYS BYRD 12 212 Center Street Suite 700 13 Little Rock, Arkansas 72201 (501) 372-6303 14 abyrd@maysbyrdlaw.com 15 on behalf of the DEFENDANT 16 Mr. Justin Brascher (Via Zoom) 17 ARKANSAS ATTORNEY GENERAL'S OFFICE 323 Center Street 18 Suite 200 Little Rock, Arkansas 72201 19 (501) 682-2007 justin.brascher@arkansasag.gove 20 21 ALSO PRESENT: Randy Schoening, Videographer (Via Zoom) 22 23 24 25</p>	<p>1 (Index continued.) 2 Exhibit 12. Training video 113 3 Exhibit 13. 3/30/21 email chain from Fred Hejazi 4 CMA_0014669-71 116 5 Exhibit 14. Page Vault training link CMA_0017409-10 120 6 Exhibit 15. Screenshot of thematics views 131 7 Exhibit 16. 7/2/21 email chain from Fred Hejazi 8 CMA_0014639-40 142 9 Exhibit 17. 7/20/21 email chain from Jennifer Wheeler 10 CMA_0015994-96 145 11 Exhibit 18. 8/9/21 meeting invite SOS20757-58 153 12 Exhibit 19. 10/17/21 email chain from Shelby Johnson 13 TSS_CMA_0000411 154 14 Exhibit 20. Board of Apportionment Report 157 TSS_CMA_0000412-22 15 Exhibit 21. 10/8/21 email chain from Shelby Johnson 16 CMA_0015378-79 160 17 Exhibit 22. Excel spreadsheet CMA_0015382 165 18 Exhibit 23. 12/1/21 email chain from Shelby Johnson 19 CMA_0015015 168 20 21 22 23 24 25</p>
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<p>1 I N D E X 2 PAGE 3 Direct Examination by Mr. Pierce 5 4 Cross Examination by Mr. Brascher 171 5 6 EXHIBITS 7 Exhibit Description 8 Exhibit 1. Subpoena 12 9 Exhibit 2. Screenshot first tab of default setting 67 10 Exhibit 3. Screenshot of second tab of default setting 68 11 Exhibit 4. 8/13/21 email chain from Fred Hejazi 12 CMA_0014078-79 84 13 Exhibit 5. 1/11/21 email chain from Fred Hejazi 14 CMA_0014235-36 87 15 Exhibit 6. 2/12/21 email chain from Shelby Johnson 16 CMA_0015017 88 17 Exhibit 7. PDF attachment to 2/12/21 email chain 89 CMA_015018-37 18 Exhibit 8. 2/12/21 email chain from Shelby Johnson 19 CMA_0015311 95 20 Exhibit 9. 2/24/21 email chain from Fred Hejazi 97 CMA_0014085 21 Exhibit 10. 2/24/21 email chain from Fred Hejazi 22 CMA_0014557-58 100 23 Exhibit 11. PDF attachment to 2/24/21 email chain 24 CMA_0014559-75 102 25 (Index continued on next page.)</p>	<p>1 STIPULATIONS 2 3 It is hereby stipulated and agreed by and 4 between the parties hereto, through their respective 5 attorneys, that the deposition of FRED HEJAZI may be 6 taken pursuant to agreement and notice and in accordance 7 with the Arkansas Rules of Civil Procedure on September 8 10, 2024, via Zoom, before Shannon S. Harwood, CSR, RPR, 9 CRR. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
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<p>1 THE VIDEOGRAPHER: Good morning. We are on 2 the record at 9:08 a.m. on September 10th, 2024. This 3 is the videotaped recorded deposition of Fred Hejazi 4 taken by plaintiff in the matter of The Christian 5 Ministerial Alliance, et al versus John Thurston, 6 Secretary of State of Arkansas, filed in the US District 7 Court, Eastern District of Arkansas. The case number is 8 4:23-cv-471-DPM-DRS-JM. The deposition is being 9 conducted remotely through virtual technology. 10 My name is Randy Schoening representing 11 Veritext Legal Solutions. I am the videographer. The 12 court reporter is Shannon Harwood, also with Veritext 13 Legal Solutions. 14 Will counsel please introduce themselves for 15 the record? 16 MR. PIERCE: Thank you. I'm Michael Pierce 17 with O'Melveny & Myers and I'm one of the attorneys 18 representing the plaintiffs in The Christian Ministerial 19 Alliance lawsuit. 20 MR. GOLDSTEIN: Matthew Goldstein of O'Melveny 21 & Myers, also for plaintiffs. 22 MR. BRASCHER: Justin Brascher of the Arkansas 23 State Attorney General for the defendants, John 24 Thurston. And I'm -- I'm sorry, I probably should have 25 brought this up before, so is Mr. Hejazi here without Page 6</p>	<p>1 A. Citygate GIS. 2 Q. So for today's deposition, I'll identify a few 3 basic ground rules so we're on the same page. You're 4 testifying under oath today, which means that you are 5 testifying with the same duty to answer questions 6 truthfully as though we were before a judge in a 7 courtroom. 8 Does that make sense? 9 A. Yes. 10 Q. Our court reporter is transcribing this 11 deposition today. With that in mind, please answer 12 questions audibly and clearly. That means that nodding 13 your head yes or shaking your head no doesn't work, 14 because that's not something the court reporter can 15 transcribe. 16 If you don't understand a question, either 17 because it didn't make sense or because I was mumbling 18 or the internet connection paused for a section, just 19 let me know and I'll repeat it. And then if I ask a 20 question and you begin answering it, I'll assume that 21 you heard and understand the question. 22 Does that make sense? 23 A. Yes. 24 Q. Okay. The primary people talking today should 25 be you and me. The court reporter may ask a question. Page 8</p>
<p>1 counsel defending this deposition? 2 MR. PIERCE: Mr. Hejazi, is that right, you do 3 not have an attorney with you? 4 THE WITNESS: I do not. 5 MR. BRASCHER: Okay. 6 THE VIDEOGRAPHER: Will -- will the witness 7 please be sworn? 8 (Witness sworn.) 9 THE VIDEOGRAPHER: You may proceed. 10 MR. PIERCE: Great. Thanks very much. 11 WHEREUPON, 12 FRED HEJAZI, 13 after having been first duly sworn, deposes and says in 14 reply to questions propounded as follows, to-wit; 15 DIRECT EXAMINATION 16 BY MR. PIERCE: 17 Q. As I just stated, my name is Michael Pierce. 18 I'm one of the attorneys representing the plaintiffs in 19 The Christian Ministerial Alliance lawsuit. 20 A. Good morning. 21 Q. Can you please state your full name for the 22 record? I know you just did. 23 A. Fred Hejazi. 24 Q. And can you please state the organization 25 you're here to give testimony on behalf of? Page 7</p>	<p>1 If -- if you need something -- you also may hear an 2 objection to questions. I would say unless for some 3 reason counsel instructs you not to answer, otherwise 4 you should just answer the question. 5 Does that make sense? 6 A. Yes. 7 Q. Okay. Is there any reason you are unable to 8 answer or -- or understand any of my questions 9 truthfully today? 10 A. No. 11 Q. This isn't an endurance contest, so if you 12 need a break, just let us know. I'm going to try to 13 work in -- I think are you on the East Coast -- 14 A. Yes. 15 Q. -- time schedule right now? Okay. My 16 thinking, then, is we go for an hour or so, we take a 17 little break and then we go for another hour, we take a 18 longer lunch break, and then we -- we return from the 19 afternoon, but with that, please let me know basically 20 if you feel like your energy is flagging and you would 21 benefit from a break. No problem. I'll just ask that 22 if I've asked a question, you answer that standing 23 question and then we can take a break. 24 Does that make sense? 25 A. Yes. Page 9</p>

<p>1 Q. Okay. And you, in the deposition today, 2 Citygate in the deposition today, are you represented by 3 yourself? 4 A. Yes. 5 Q. Okay. Meaning neither you nor Citygate has 6 counsel that represents you in connection with this 7 deposition? 8 A. That's correct. 9 Q. Have you ever been deposed before? 10 A. Yes. 11 Q. Tell us about that. 12 A. Just different -- different cases on -- 13 related to work and also personal. 14 Q. On the -- the depositions related to work, how 15 many times have you been deposed? 16 A. A few times. I don't recall exactly the 17 number. 18 Q. Recently? 19 A. Not recently. 20 Q. What -- sorry, how many years ago is the most 21 recent time you've been deposed for work? 22 A. Probably 10 years ago. 23 Q. And was this in connection with Citygate or 24 was this a prior job? 25 A. It's connection with Citygate.</p> <p style="text-align: right;">Page 10</p>	<p>1 Q. California. Got it. Okay. Thank you. So 2 here you've been designated to testify on behalf of 3 Citygate under Rule 30(b)(6) of the Federal Rules of 4 Civil Procedure. Have you served as a Rule 30(b)(6) 5 witness before? 6 A. Not to my knowledge. 7 Q. Okay. You understand that as a 30(b)(6) 8 witness, your role is to speak and testify on behalf of 9 Citygate, not on behalf of yourself as an individual? 10 A. Yes. 11 Q. So if I -- typically during the rest of this 12 deposition, if I say "you" or "your," I'm generally 13 going to mean Citygate the company not you personally. 14 Does that make sense? 15 A. Yes. 16 Q. Okay. We're going to mark as Plaintiff's 17 Exhibit 1 a subpoena with the first page dated August 18 30th, 2024, so if we can pull that up. 19 (Deposition Exhibit No. 1 was marked for 20 identification and made part of the record.) 21 MR. GOLDSTEIN: And you should be able to see 22 that appear in the folder on the Exhibit Share. 23 A. Yes. 24 Q. (By Mr. Pierce) Okay. So what has been 25 marked as Plaintiff's Exhibit 1 is a subpoena to</p> <p style="text-align: right;">Page 12</p>
<p>1 Q. Do you remember the name of that case? 2 A. I don't. 3 Q. Can you describe sort of what the case was 4 about? 5 A. It was a redistricting issue. 6 Q. Any other depositions other than the 7 redistricting case about 10 years ago that you can 8 recall? 9 A. No. 10 Q. And in your personal life, you've also gotten 11 deposed. Could you just briefly describe what those 12 cases were? 13 A. Property issues, divorce issues, things like 14 that. 15 Q. Got it. Okay. So here in this deposition, 16 you've been designated to testify on -- and sorry. I 17 guess just one more question. Any other details you can 18 recall about the redistricting lawsuit from about 10 19 years ago where you were deposed? 20 A. Just basically what my role was, what 21 redistricting software is, things like that. It was 22 very general. 23 Q. And was it in connection with a particular 24 state's redistricting? 25 A. I believe it was California.</p> <p style="text-align: right;">Page 11</p>	<p>1 Citygate with the first page dated August 30th, 2024; is 2 that right? 3 A. Yes. 4 Q. If you could flip to Page 5 of that PDF, that 5 includes a set of deposition topics; is that right? 6 A. Yes. 7 Q. Do you see that list of topics? 8 A. I do. 9 Q. Are you prepared to testify on behalf of 10 Citygate for all of these topics? 11 A. To the best of my knowledge. 12 Q. Do you -- do you have knowledge of the -- the 13 topics listed? Do they look familiar to you? 14 A. They look familiar to me. I wasn't 15 necessarily involved in all of these, but to -- to the 16 best of my knowledge, as far as I was involved, I'm 17 happy to testify. 18 Q. Do you think there's anyone at Citygate that's 19 more qualified than you to answer questions on these 20 topics? 21 A. No. 22 Q. What did you do to prepare for today's 23 deposition to serve as a Rule 30(b)(6) witness on behalf 24 of Citygate? 25 A. I just read through the -- the subpoena to</p> <p style="text-align: right;">Page 13</p>

<p>1 make sure that there was nothing in there that I hadn't 2 provided you guys. 3 Q. And about how many hours did you spend 4 preparing? 5 A. I didn't spend any more than about 15 minutes 6 looking through this. 7 Q. And without going into the substance of any 8 conversation, did you meet with any counsel to prepare 9 for today's deposition? 10 A. No. 11 Q. And it sounds like -- were there any subjects 12 in that list of 30(b)(6) topics that you did not have 13 knowledge of that you then had to go learn about and be 14 educated on? 15 A. No. 16 Q. Did you discuss today's deposition with anyone 17 prior to the deposition beginning? 18 A. No. 19 Q. Did you review any documents ahead of today's 20 deposition to prepare? 21 A. No. 22 Q. Anything else you did to prepare for today's 23 deposition other than reviewing the subpoena for 24 something like 15 minutes? 25 A. No.</p> <p style="text-align: right;">Page 14</p>	<p>1 Q. And you searched emails using -- using the 2 list of individuals that you remembered working with and 3 it sounds like you also looked for data that you shared 4 with Arkansas in connection with the 2021 redistricting? 5 A. Yes. 6 Q. Anything else other than looking through 7 emails with the Arkansas folks you worked with and 8 looking for data that you shared with them? 9 A. Also contracted -- any contractual information 10 that I had. 11 Q. Got it. So other than emails, data you shared 12 with them, and contractual information, anything else? 13 A. No. 14 Q. So no -- 15 A. Emails -- emails, data, and contractual 16 information. That's all I -- that's all I -- that's all 17 I had and that's all I shared. 18 Q. Got it. So no, like, hard copy files related 19 to this work? 20 A. There was no hard copy files. 21 Q. And you weren't texting with the Arkansas 22 folks you work with about this work? 23 A. I didn't recall if I had any texting that I 24 had done with them, but I did not share that. 25 Q. Okay. Did you have any assistance when you</p> <p style="text-align: right;">Page 16</p>
<p>1 Q. We'll ask you to flip to Pages 11 to 13 in 2 Exhibit 1, which are the document requests. 3 A. Yes. 4 Q. Have you seen this list before? 5 A. Yes. 6 Q. Did you search, collect, and produce documents 7 in response to this set of requests? 8 A. Yes. 9 Q. What was your process for identifying those 10 documents? 11 A. I went through all my emails and selected any 12 exchanges that I had with -- with the State of Arkansas. 13 Then I went through the data sets that we had produced 14 for them as well as any proposal material for -- for -- 15 related to contracts and I bundled those and sent them 16 to you guys. 17 Q. And when you say "went through emails," did 18 you use search terms? Were you manually -- 19 A. I searched, search terms. 20 Q. Search terms. Got it. And how did -- how did 21 you develop those search terms? 22 A. I just looked for the -- looked for individual 23 that whose name I remember. I looked at what his email 24 was and then I grabbed the -- the domain portion of it 25 and I searched for that.</p> <p style="text-align: right;">Page 15</p>	<p>1 were -- and sorry, to step back. Did -- did you text 2 about sort of the substantive work of the 2021 3 redistricting with your Arkansas clients? 4 A. Not that I recall. 5 Q. Okay. Did you have any assistance when you 6 were identifying these emails, contracts and data? 7 A. I'm sorry, say that again. 8 Q. Did you have any assistance in isolating the 9 emails and contracts and data or is that something just 10 you did? 11 A. I just did it. 12 Q. Were there any documents that -- any -- any 13 emails, contracts or data that you saw that related to 14 the 2021 redistricting that you decided not to produce 15 for any reason? 16 A. No, I produced everything that was related. 17 Q. And for -- for data, how -- how did you 18 isolate the set of data to proximate cause? 19 A. We produce data for every state and we put it 20 on our -- on our download site and I just went to that 21 download site and I downloaded all the stuff that had to 22 do with Arkansas. They're grouped by state. 23 Q. Got it. Okay. We're now going to go into a 24 couple of just questions about your general background. 25 What is your educational background?</p> <p style="text-align: right;">Page 17</p>

<p>1 A. I have a bachelor's in Civil Engineering from 2 University of Maryland.</p> <p>3 Q. And if you could walk me through at a high 4 level sort of your work/professional background starting 5 after college and going through Citygate?</p> <p>6 A. After City -- you're talking about after 7 college before Citygate, right?</p> <p>8 Q. Yeah, just sort of a very high level of what 9 did you do before Citygate?</p> <p>10 A. I work for an engineering company for about 11 six years as the chief information officer and then I 12 started Citygate and I've been at Citygate ever since.</p> <p>13 Q. When did you start Citygate?</p> <p>14 A. I believe 1991. It was named something else 15 back then. It was named Digital Engineering and then it 16 was renamed in 2005 to Citygate.</p> <p>17 Q. And -- and can you describe for us sort of how 18 Citygate has -- has changed over time, if it has?</p> <p>19 A. It started as a mapping consulting firm and 20 then it became a software development firm as we 21 developed products.</p> <p>22 Q. Can you say a little more about the shift 23 between doing consulting work to doing software work?</p> <p>24 A. We just started to -- we had consulting work 25 in the area of redistricting and then we had to develop</p> <p style="text-align: right;">Page 18</p>	<p>1 A. In the area of redistricting?</p> <p>2 Q. Yes.</p> <p>3 A. No.</p> <p>4 Q. What other clients have you had as consulting 5 clients other than the -- the police department that you 6 mentioned?</p> <p>7 A. In the area of redistricting?</p> <p>8 Q. Yes, in the area of redistricting.</p> <p>9 A. We've had school districts. We've had cities, 10 counties that wanted us to just draw the map for them, 11 for city council. As I said, we've had school districts 12 that wanted us to draw attendance areas for -- for 13 students. We've had sales districts that have been -- 14 that -- that needed to be drawn, so it's all manners of 15 redistricting.</p> <p>16 Q. Have you done -- have you drawn -- has 17 Citygate drawn maps for congressional redistricting?</p> <p>18 A. Not to my knowledge.</p> <p>19 Q. Has Citygate --</p> <p>20 A. Not that I recall.</p> <p>21 Q. Got it. So I didn't mean to interrupt.</p> <p>22 Sorry. I believe you were saying you -- not to your 23 knowledge, you don't recall Citygate ever drawing maps 24 as part of its consulting services for congressional 25 redistricting?</p> <p style="text-align: right;">Page 20</p>
<p>1 some tools and then we formalized those tools into 2 products. And then as we started to sell those 3 products, we became more of a shift towards a software 4 development company.</p> <p>5 Q. And when did that shift occur?</p> <p>6 A. It occurred over about -- span of about 15 7 years.</p> <p>8 Q. And when -- when you say you did -- Citygate 9 did consulting work related to redistricting, what does 10 that mean?</p> <p>11 A. We were hired to draw boundaries for a police 12 department in Maryland, and then as a result of that, we 13 developed some tools and then we made those tools into 14 an application and then we made the application 15 commercial.</p> <p>16 Q. Does Citygate still do this type of consulting 17 work?</p> <p>18 A. Yes.</p> <p>19 Q. Is the consulting work -- let me rephrase. It 20 sounds like you were saying the consulting work involves 21 actually helping your client draw -- you know, draw the 22 maps; is that right?</p> <p>23 A. Yes, yes.</p> <p>24 Q. Anything else the consulting work involves 25 other than sort of helping to draw the map?</p> <p style="text-align: right;">Page 19</p>	<p>1 A. No, I'm pretty sure we -- we typically at the 2 state level don't -- we just provide software and 3 training and support. Most states either draw -- they 4 draw it themselves or they hire staff to do that work.</p> <p>5 Q. I know you said most or typical. Is there an 6 exception that comes to mind that, oh, we don't -- there 7 was one state one time that actually had you draw either 8 state -- either state maps or congressional maps?</p> <p>9 A. No, I don't -- I don't recall ever doing that.</p> <p>10 Q. Okay. When clients would ask Citygate to draw 11 maps as part of Citygate's consulting services, would 12 the clients provide guidance to Citygate on the criteria 13 to use when drawing a map?</p> <p>14 A. Yeah, it's -- sort of, yes, I guess.</p> <p>15 Q. Can you just, you know, describe any of that 16 criteria?</p> <p>17 A. For example, if it was a city, they would say, 18 you know, we have 10 council members, so we need -- we 19 need a plan that has 10 boundaries. And then we would 20 draw it and they would look at it and say, you know, 21 move this over here, move that over there, this 22 neighborhood is -- shouldn't be split, you know, things 23 like that.</p> <p>24 Q. In -- any other types of criteria from your -- 25 your consulting map drawing work that you would get from</p> <p style="text-align: right;">Page 21</p>

<p>1 clients?</p> <p>2 A. These are generally case dependent, so they're</p> <p>3 not -- there's not a uniform way of saying, you know,</p> <p>4 they -- they all ask for this or that. It's usually --</p> <p>5 it's usually case dependent to the locality and also we</p> <p>6 generally provide them the basic rules of redistricting.</p> <p>7 So, you know, we advise them that you can't -- you know,</p> <p>8 say that I want to have all the minorities in this</p> <p>9 little district or I want to split them, things that --</p> <p>10 things that would get them into trouble, we would -- we</p> <p>11 would -- we would explain ahead of time. And then --</p> <p>12 then we draw the maps according to population generally</p> <p>13 and then they make comments about concerns that they</p> <p>14 have locally.</p> <p>15 Q. And how would you explain the -- I mean, what</p> <p>16 call it, the basic rules of redistricting?</p> <p>17 A. We would typically have a session before</p> <p>18 started explaining what the percentages, how much higher</p> <p>19 -- how much deviation you can expect between your</p> <p>20 highest and lowest populated districts and how close</p> <p>21 they need to be to the ideal population and not to make</p> <p>22 crazy shapes that would get them into -- into trouble.</p> <p>23 Just very basic information. It's available</p> <p>24 through NCSL, National City State Legislators</p> <p>25 Conference. They do a lot of sessions on the do's and</p> <p style="text-align: right;">Page 22</p>	<p>1 A. So -- so there's -- that's not really accurate</p> <p>2 as far as rules because they're not rules. They're just</p> <p>3 stuff that generally keeps you out of court. You can</p> <p>4 draw whatever you want. The question is whether you get</p> <p>5 -- and if nobody takes you to court, then you just draw</p> <p>6 whatever you want, but if you go to court, you are more</p> <p>7 likely to lose if you've packed all the minorities into</p> <p>8 one district and/or looks like you've tried to split</p> <p>9 them up.</p> <p>10 That's just from the general observation of</p> <p>11 court rulings. There's -- there's no law that says you</p> <p>12 can or cannot do one thing or the other.</p> <p>13 Q. And is that your observation from reading</p> <p>14 Court rulings in this -- in this area?</p> <p>15 A. It's from attending conferences, listening to</p> <p>16 lectures about what the outcomes of various cases were.</p> <p>17 Q. So in your training sessions to your clients</p> <p>18 that didn't have lawyers advising them, you would convey</p> <p>19 these -- I don't know what to -- I think you originally</p> <p>20 called them rules, but then now you said they're not</p> <p>21 necessarily rules. They're things to -- things not to</p> <p>22 do if you want to avoid -- avoid litigation; is that</p> <p>23 right?</p> <p>24 A. Again, you know, there are places that</p> <p>25 litigation is not an issue and there's places -- these</p> <p style="text-align: right;">Page 24</p>
<p>1 don'ts of redistricting.</p> <p>2 Q. Just to recap, the -- it sounds like in your</p> <p>3 consulting work, you would have sort of training</p> <p>4 sessions with your clients before you started drawing</p> <p>5 the map where you would give them -- I think what you</p> <p>6 called the basic rules of redistricting, which it sounds</p> <p>7 like you got from the national conference for state</p> <p>8 legislators; is that right?</p> <p>9 A. Assuming they didn't have their own attorney.</p> <p>10 Sometimes they have their own attorney that advises</p> <p>11 them. Sometimes it's a -- it's a small city that has</p> <p>12 10,000 people in it and that's all -- you know, they</p> <p>13 don't know anything about redistricting and they just</p> <p>14 want the basics done so we just provide that information</p> <p>15 so that they know -- they know what guidelines we use</p> <p>16 for redistricting.</p> <p>17 Q. And I think you mentioned -- you mentioned as</p> <p>18 far as what the basic rules are that you would convey to</p> <p>19 your clients, something about how you can't put all the</p> <p>20 minority voters, you know, together in a single</p> <p>21 district. You can't spread them all out across</p> <p>22 different districts, and then you can't have weird</p> <p>23 shapes I think were the three I heard.</p> <p>24 Is that right? And if so, does -- does any</p> <p>25 other sort of basic rule come to mind?</p> <p style="text-align: right;">Page 23</p>	<p>1 are -- this is just the general things we tell our</p> <p>2 clients to try to make districts that are -- that --</p> <p>3 that don't create issues for them. That's just, as I</p> <p>4 said, general guidelines that we provide and mostly we</p> <p>5 try to explain this is what we're using. So when they</p> <p>6 see a district, they're going to -- and ask us why did</p> <p>7 you draw it this way, that's the guidelines that we use.</p> <p>8 Now, sometimes they go along with it. Sometimes they</p> <p>9 have their own ideas. It varies from locality to</p> <p>10 locality.</p> <p>11 Q. So these general guidelines that you would</p> <p>12 provide to them, it sounds like you're saying here's --</p> <p>13 here's what's -- here's sort of the -- the rules or the</p> <p>14 principles Citygate is going to follow when it's</p> <p>15 drafting a map for you and then they can ask questions</p> <p>16 or use different criteria?</p> <p>17 A. Well, if they've hired us to -- to draw the --</p> <p>18 draw it for them, we're going to use -- we explain our</p> <p>19 -- our standard process, our typical process. Then if</p> <p>20 they have any issues, they'll bring it up. If not,</p> <p>21 we'll draw a draft plan. They'll look at it and they</p> <p>22 will make -- they will make suggestions and then we make</p> <p>23 adjustments as long as the population deviation state</p> <p>24 where they are supposed to then -- then we follow --</p> <p>25 we -- we draw the map for them.</p> <p style="text-align: right;">Page 25</p>

<p>1 In -- before -- before the last cycle when 2 Section 5 was an issue, we had -- in areas that we had 3 to get the plan submitted to the Justice Department, 4 there were more hard fast rules as to what we had to do 5 and what was allowed and what the Justice Department 6 would accept. Since that's not a -- that was not an 7 issue in this last cycle, then -- then we didn't really 8 have to worry about that. So it was a little bit more 9 stick to the population and don't create obvious errors 10 that -- that you could get sued for, but that's -- as I 11 said, it's just a recommendation. Sometimes they accept 12 it. Sometimes they don't.</p> <p>13 Q. So in the -- in the -- I guess you're saying 14 there's -- there's been a change with Section 5 15 requirements. Sort of -- do you know when that change 16 happened?</p> <p>17 A. I'm sure I do somewhere written and I have the 18 dates and the cases and all that, but I don't remember 19 it off the top of my head. I just remember it was not 20 an issue in this last cycle.</p> <p>21 Q. Got it. Like in -- meaning in the 2021 22 redistricting?</p> <p>23 A. That's correct.</p> <p>24 Q. Okay. So these -- it sounds like -- so 25 Citygate would say in its consulting services, here are</p> <p style="text-align: right;">Page 26</p>	<p>1 intentionally disadvantage minority voters. Apologies. 2 Is that what you said as sort of this last 3 criteria?</p> <p>4 A. Yes.</p> <p>5 Q. Got it. Could you tell us a little bit more 6 about, like, what that means or how you measure that?</p> <p>7 A. It's not a measurement for it. It's -- 8 there's different ways of -- different ways of people -- 9 historically of disadvantaged minorities. They either 10 pack them into a single district or they split them up 11 into multiple districts so that they can have a majority 12 minority district. That's one of the ways that 13 historically minorities have been disadvantaged.</p> <p>14 Q. And in your -- in Citygate's consulting 15 practice, fair to say that you tried not to do that when 16 you were drawing maps?</p> <p>17 A. When we are drawing maps, there are certain 18 times when it's not possible to do that, so it's -- you 19 know, you have situations where -- where minorities are 20 concentrated in an area and because of physical features 21 or because of whatever geography you happen to have, you 22 end up with what looks like a packing situation or -- or 23 a situation where you split them up, but we don't 24 intentionally do it. So we don't -- we don't force 25 create districts, go out of our way to create districts</p> <p style="text-align: right;">Page 28</p>
<p>1 the basic principles that we're going to follow with 2 respect to drawing your map and then would -- would draw 3 a map and the client would have questions or concerns 4 and could ask you to do differently. At a high level; 5 is that right?</p> <p>6 A. Yes.</p> <p>7 Q. So the -- in the -- in the Citygate sort of 8 these are -- these are our principles, here's what -- 9 here's what we generally try to do, what are those when 10 you're drawing a map?</p> <p>11 A. Generally we try to make them as close to 12 equal population as possible and we try to stay as close 13 to the existing district as possible, make the least 14 amount of changes and we try to keep neighborhoods 15 together, communities of interest together, and we don't 16 intentionally disadvantage minorities in the voting 17 process.</p> <p>18 Q. Got it. 19 (Audio interruption.)</p> <p>20 MR. PIERCE: I'm sorry, I think someone is 21 speaking. Someone is not on mute. If you can go on 22 mute. Arkie, I think you're not on mute. Okay. Sorry 23 about that.</p> <p>24 Q. (By Mr. Pierce) So, Mr. Hejazi, you were 25 saying -- oh, okay. Not to -- I mean, not to</p> <p style="text-align: right;">Page 27</p>	<p>1 that -- that create that condition.</p> <p>2 Q. So your consulting map drawing services, you 3 would never try to dilute minority voting power. 4 Sometimes it might look like that based on the map, but 5 in fact, there would be something else going on that 6 would require that particular splitting of the minority 7 population?</p> <p>8 A. In our -- in -- in our process, we don't try 9 to intentionally create those issues. I don't know -- I 10 don't know that it's ever happened where it looked like 11 it or not. It's possible. We've been doing this for 12 almost 35 years, so it's possible that it's happened, 13 but I cannot recall off the top of my head. We 14 generally try not to do it.</p> <p>15 Q. And I know -- I think you testified earlier 16 that Citygate would explain to its client as part of its 17 consulting services, here's -- you know, here's the 18 principles we're following, we'll draft the map and then 19 the client could sort of override that and say, you 20 know, no, we want you to do it this way or oh, we want 21 to you do it this other way.</p> <p>22 As part of Citygate's consulting services, did 23 any client ever tell you, you know, we want to dilute 24 minority voting power?</p> <p>25 A. No.</p> <p style="text-align: right;">Page 29</p>

<p>1 Q. And if we shift to Arkansas, did -- did 2 Citygate ever have Arkansas as a consulting client?</p> <p>3 A. I don't believe so.</p> <p>4 Q. And -- and did Citygate ever give Arkansas 5 this sort of training related to the -- you know, I 6 think earlier you said rules, now it's more like, you 7 know, principles or guidelines about dilution of 8 minority voting power and similar topics?</p> <p>9 A. No, I don't -- I don't believe so.</p> <p>10 Q. Okay. Okay. So can you describe for us the 11 times when Citygate has worked with Arkansas in 12 connection with congressional redistricting?</p> <p>13 A. I don't know that I know when that is.</p> <p>14 Q. What would help -- what would help you know 15 what that is?</p> <p>16 A. I don't know that there is anything that would 17 help for me to know that, because we provided the State 18 of Arkansas software to do redistricting at state and 19 congressional and local -- for localities. I don't know 20 when they used it for what purpose.</p> <p>21 Q. Got it. So you -- Citygate licenses its 22 software to Arkansas. The software can be used for 23 local, state, congressional districts. So your 24 testimony is you know that you licensed them the 25 software that had these capabilities, but you can't</p> <p style="text-align: right;">Page 30</p>	<p>1 we licensed to them on the -- on the internet and how it 2 was used. I don't -- I simply don't recall. We had a 3 lot of clients and Arkansas was one of them. So I don't 4 fully know what they implemented and what they didn't 5 implement. It's in the documents that I provided you as 6 far as what we sold them. Again, I don't know what was 7 implemented, but we have several web applications. 8 One of them allows plans to be placed online 9 and then members of the public to view it and place 10 comments on the map as far as positive or negative 11 comments.</p> <p>12 Q. So you are confident that Citygate licensed 13 AutoBound to Arkansas in connection with redistricting 14 work. You're not sure whether Citygate licensed its 15 online software to Arkansas, and even if it did, you 16 wouldn't be sure if or how Arkansas actually used it?</p> <p>17 A. Correct. I'm fairly certain that we did 18 license online technology to Arkansas. I couldn't tell 19 you -- I wasn't -- there's -- there's situations where 20 -- where we go in and make modifications to the software 21 specifically for things that the client wants, so then I 22 would be more familiar with what they are and are not 23 doing. I don't recall that with -- with Arkansas, so I 24 couldn't speak of whether they -- they implemented it or 25 not, and if they did, what specifically they</p> <p style="text-align: right;">Page 32</p>
<p>1 speak to ultimately exactly what they -- what they used 2 it for?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. Can you tell us the -- the different 5 time periods when Citygate licensed this software to 6 Arkansas?</p> <p>7 A. I believe we -- we -- we licensed software to 8 them in the 1990 redistricting cycle, the 2000 9 redistricting cycle. Actually, maybe not 1990. At 10 least 2000, 2010 and 2020.</p> <p>11 Q. Got it. And other than licensing -- and I 12 guess when we say software, what software are we talking 13 about?</p> <p>14 A. So we have a product called AutoBound, which 15 is a redistricting application and it's evolved 16 obviously over the 30 years that we've had it, so that's 17 the software.</p> <p>18 Q. Other than AutoBound, any other software that 19 Citygate has licensed to Arkansas in connection with 20 redistricting?</p> <p>21 A. Yes, I believe we also licensed to them our 22 web-based application that allows commenting on plans.</p> <p>23 Q. Describe the -- the web-based application 24 including its name.</p> <p>25 A. To be honest, I don't actually remember what</p> <p style="text-align: right;">Page 31</p>	<p>1 implemented.</p> <p>2 Q. Other than AutoBound and the corresponding 3 online tool, anything else that Citygate licensed to 4 Arkansas in connection with the -- the 2021 5 redistricting?</p> <p>6 A. We provided them a census data, which was part 7 of the software, and then we provided technical support 8 for use of the software.</p> <p>9 Q. Got it. So other than the -- other than the 10 AutoBound software, the web-based application, the 11 census data and the technical support of the -- of all 12 those three, anything else that Citygate provided to 13 Arkansas in connection with the 2021 redistricting?</p> <p>14 A. Not that I recall.</p> <p>15 Q. And you mentioned the census data. Were you 16 -- when Citygate provides the census data to Arkansas, 17 how does it do that? Are you loading it into AutoBound 18 or are you, you know, sharing the data with them and 19 they're -- they're supposed to ingest it?</p> <p>20 A. The software has the ability to download and 21 ingest the census data directly, but that process is 22 time consuming, so we generally run that data and create 23 the database and we make it available online.</p> <p>24 Q. Does -- Citygate runs and processes the data 25 and then you would let Arkansas know that now it's ready</p> <p style="text-align: right;">Page 33</p>

<p>1 for download and then your -- your clients would 2 download it and it would be ingested into the AutoBound? 3 A. Yes. 4 Q. And does Citygate have visibility into who -- 5 you know, is downloading the --the data, who is using 6 the data within Arkansas or is it just that, you know, 7 per the license, they have a certain number of AutoBound 8 licenses and those -- those ones are allowed to -- to 9 ingest the data? 10 A. No, we make the data available publicly, so 11 anybody can download it. 12 Q. Got it. And does -- does Citygate keep a 13 record of who's downloaded which data sets? 14 A. No, we don't. It's just made public. 15 Q. Got it. Other than census data, any other 16 data sets that Citygate shared with Arkansas in 17 connection with the 2021 redistricting? 18 A. Not that I recall. 19 Q. And the mechanism you described for the census 20 data, please tell me if I'm wrong, but is that Citygate 21 would basically, you know, publicly share it and then 22 Arkansas could, you know, download it, incorporate it 23 into their AutoBound software. Is that -- is that fair? 24 A. Yes. 25 Q. Were there any non-public transmissions of</p> <p style="text-align: right;">Page 34</p>	<p>1 believe we did it for Illinois. I think those are the 2 ones I remember, three to four -- 3 Q. Fair to say that -- fair to say that if 4 Citygate's AutoBound clients would like political voting 5 data to be loaded into their AutoBound, that's something 6 that Citygate can and has helped with? 7 A. Yes. 8 Q. But Arkansas, to your knowledge, did not ask 9 for help loading this type of data in the 2021 10 redistricting? 11 A. That's correct. 12 Q. In your experience, would it be likely that 13 Arkansas on its own without your knowledge and 14 involvement would load political data by itself into 15 AutoBound? 16 A. I couldn't speak to -- I mean, Arkansas is a 17 sophisticated state technologically, so if they wanted 18 to, I suppose they could do it, but I couldn't really 19 speak to if this is something they would have or 20 wouldn't have done. 21 Q. Yep. Would you -- maybe it was a bad 22 question. Let me ask it a better way. 23 Would you expect them to, you know, ask you 24 for help or assistance in doing that? 25 A. I don't know that I would have expected it or</p> <p style="text-align: right;">Page 36</p>
<p>1 data sets to Arkansas in connection with the 2021 2 redistricting? 3 A. Not that I recall. 4 Q. Did -- okay. So did Citygate make available 5 to or load for Arkansas, you know, political data? 6 A. Not that I recall. I'm fairly certain we 7 didn't, but not -- not that I remember. 8 Q. And when I say political data, how do you 9 understand that? 10 A. Results of voting and -- and voter data. 11 Q. Got it. So Citygate didn't provide voter 12 data, results of voting to Arkansas in connection with 13 the 2021 redistricting? 14 A. Not that I recall. That's a fairly involved 15 process to generate that data, so if I had done it, I 16 think I would have remembered it, but I don't -- I don't 17 recall having done that for them. 18 Q. Is it something that Citygate does or has done 19 for other state redistricting -- 20 A. Yes. 21 Q. -- clients? 22 A. Yes, we have done that before. 23 Q. Which -- which states have you done that for? 24 A. Off the top of my head, I think we did it for 25 Pennsylvania. We may have done it for Virginia. I</p> <p style="text-align: right;">Page 35</p>	<p>1 not expected it. I don't -- I don't -- I didn't have 2 any specific expectations that they would ask for help 3 or -- you have to also understand, when somebody asks a 4 question about a particular soft -- a particular 5 function of software, our normal process is to answer 6 the question and not ask them why they're asking it. 7 Q. Got it. And that -- that -- how does that 8 relate to this question of political data? 9 A. Well, it asks -- they may have asked how do 10 you do -- how does this function work and I would have 11 explained it to them and then that would have been the 12 end of the conversation. So they may have been doing 13 the work -- they may have been asking it so they could 14 process political data or -- or they may have been 15 asking it as it related to something completely 16 different. I wouldn't know necessarily. 17 Q. Got it. What you're saying is that Citygate's 18 rule in providing technical support relating to 19 AutoBound is to answer questions users have, not to ask 20 about what's motivating the question or what the user 21 does with that information? 22 A. That's correct. 23 Q. Okay. You said Arkansas -- I believe you said 24 the word like sophisticated, you called them, like, 25 either a sophisticated client or they're sophisticated</p> <p style="text-align: right;">Page 37</p>

<p>1 technologically. Could you sort of go into detail sort 2 of what you mean there?</p> <p>3 A. I mean, they're -- they have a professional IT 4 staff.</p> <p>5 Q. In contrast to some of your other clients that 6 might not have as much, like, technical support?</p> <p>7 A. Yeah, they are -- there are some states where 8 the work is done, the client is not a state legislature, 9 it's a political party, and so in that particular case, 10 they may not be using the state's IT services. I 11 believe in Arkansas, the state was involved in the -- a 12 configuration of the system, so they would have more 13 technical skill than other states that wouldn't involve 14 the IT staff.</p> <p>15 Q. Okay. We're going to shift now into those -- 16 basically that -- that list of topics.</p> <p>17 A. Sure.</p> <p>18 Q. So we'll -- we'll track through those and ask 19 you some questions about each of them and then we'll go 20 through -- I know you mentioned the documents. After 21 we're finished going through that initial set of 22 questions, we'll go through some of the documents.</p> <p>23 Okay. So for the role of Citygate GIS, which 24 we've been calling Citygate in the State of Arkansas's 25 2021 congressional redistricting, I think we just went</p> <p style="text-align: right;">Page 38</p>	<p>1 this; you know, how do I make a report; how do I make a 2 map, things like that. There's not a uniform -- I mean, 3 first of all, I wouldn't be able to remember every 4 question from -- from they might have asked two years 5 ago and there could -- there was nothing -- there was no 6 question that I can recall that was out of the ordinary 7 other -- you know, that those -- that -- that seemed 8 like indicate some unusual way the software was being 9 used, so they were just typical questions about 10 functionality of the software.</p> <p>11 Q. Any questions about minority voters and either 12 putting them in the same district or separating them 13 about other -- into other districts, I believe you -- 14 the topic you talked about a little earlier?</p> <p>15 A. No, that -- that would have been an unusual 16 question, because most -- most of the questions that we 17 receive on technical support, not just from Arkansas, 18 from everybody else, strictly deals with functionality 19 of software, not with, you know, what's a good way to 20 create a minority district. That -- that's a consulting 21 type question and it's not something that a technical 22 support contract covers.</p> <p>23 Q. Got it. So did they -- in these technical 24 support questions, did they ask about, like, the 25 information that would be displayed on the map drawer's</p> <p style="text-align: right;">Page 40</p>
<p>1 through it, but it sounds like, at a high level, 2 Citygate provided to Arkansas licenses for software use, 3 AutoBound and a web application and provided technical 4 support and provided the census data; is that right?</p> <p>5 A. Yes.</p> <p>6 Q. And anything else?</p> <p>7 A. Not that I recall.</p> <p>8 Q. Who at Citygate was working primarily on the 9 Arkansas 2021 congressional redistricting work?</p> <p>10 A. It was myself primarily.</p> <p>11 Q. The -- okay. So Arkansas as a client, what 12 did they -- you know, can you describe the types of 13 requests that you got from them in connection with the 14 2021 redistricting?</p> <p>15 A. There would be requests for -- when you say 16 requests, you mean the technical support calls that they 17 would make?</p> <p>18 Q. Yeah, let me rephrase better. Can you just 19 describe the interaction -- so other than -- we know 20 about the -- you know, the licensing, the census data 21 and the technical support can you just describe your 22 interactions with folks at Arkansas in connection with 23 the 2021 congressional redistricting?</p> <p>24 A. Typically they would ask questions about, you 25 know, particular functions of the software; how do I do</p> <p style="text-align: right;">Page 39</p>	<p>1 screen when they're drawing a map in AutoBound?</p> <p>2 A. They may have asked that.</p> <p>3 Q. Did they ask about the racial demographic 4 information that would be displayed on users' screens 5 when they're drawing a map in AutoBound?</p> <p>6 A. I don't specifically recall them asking about 7 that. When you're working, again, the software is 8 customizable, so I don't know what they customize it to 9 display, but typically when you're working, it does show 10 some of the minority categories in it, but broken down 11 by district.</p> <p>12 Q. Got it. So we -- make sure I'm understanding. 13 Citygate can set, like, default settings in AutoBound, 14 but the -- you know, each end user is able to sort of 15 customize it themselves?</p> <p>16 A. That's correct.</p> <p>17 Q. In your -- I guess in your experience, do most 18 users customize the view or are most users sort of 19 sticking with the defaults?</p> <p>20 A. That's -- I couldn't give you an answer on 21 that. I don't know what most users do. We provide -- 22 it's a spreadsheet basically and we provide examples of 23 different configurations and I couldn't tell you what 24 people pick or if they changed it their own. I couldn't 25 really speak to that.</p> <p style="text-align: right;">Page 41</p>

<p>1 Q. When you're doing, you know, technical support 2 questions and you're seeing screenshots or you're doing 3 a screen share and looking at their screen, in your 4 experience with that, you know, across clients, is it 5 something where you, when you see the screen, you know, 6 it's typically pretty similar to the -- the default or 7 is it the case that often when you're looking at these 8 screens it's been -- you know, it's been wholly 9 customized and you barely recognize it?</p> <p>10 A. It varies. Most of the times, people stick to 11 the -- to the standard interface, but it's -- it varies. 12 And also, it varies by plan, so it's not -- it's not 13 uniform by -- it's not uniform across the system. So if 14 they're making 20 different plans, they could have 20 15 different configurations.</p> <p>16 Q. Meaning when the same user for the same 17 project like Arkansas's 2021 congressional 18 redistricting, if they're working on multiple draft 19 maps, what you're saying is that the -- the view of auto 20 -- the AutoBound display could be different for each of 21 those maps?</p> <p>22 A. It could be. I don't know that it would be, 23 but it -- I mean, again, it's -- it's -- if you imagine 24 a Word document, you can have 10 different documents 25 that look 10 different ways.</p> <p style="text-align: right;">Page 42</p>	<p>1 A. That's right.</p> <p>2 Q. Okay. Okay. I want to confirm really quick, 3 I think your -- your prior testimony covered it, but 4 just to -- just to make sure that -- the work that city 5 did -- Citygate did for Arkansas in connection with the 6 2021 congressional redistricting, did it include helping 7 to draw the maps?</p> <p>8 A. No.</p> <p>9 Q. Did it include, you know, proposing alternate 10 maps?</p> <p>11 A. No.</p> <p>12 Q. Did it include assessing -- assessing 13 Arkansas's draft maps, like, for example, whether 14 they're in compliance with any requirements?</p> <p>15 A. No.</p> <p>16 Q. Did Citygate provide advice on how to achieve 17 particular goals or particular partisan outcomes in a 18 district?</p> <p>19 A. Not in any specific way.</p> <p>20 Q. In a more general way?</p> <p>21 A. If it was a technical support question.</p> <p>22 Q. Were there any technical support questions 23 about how to achieve particular partisan outcomes that 24 you can recall?</p> <p>25 A. I can't recall -- I cannot recall that there</p> <p style="text-align: right;">Page 44</p>
<p>1 Q. Yep. Understood. And then I think I heard 2 you testify earlier that -- with those caveats that 3 users can ultimately customize how AutoBound looks, 4 including with respect to each individual draft map, in 5 your experience doing the technical support, you know, 6 most of the time most users have, you know, the -- the 7 default AutoBound view set up?</p> <p>8 A. Most of the times -- most of the times if 9 they're having some sort of issue, we try to address the 10 issue using the default configuration so that we can 11 take out of the equation any customization they've done 12 that could be -- that could be the cause of the issue. 13 So the first thing we typically do is go to a default 14 view and make sure everything is working right and set 15 up correctly.</p> <p>16 So I would most often see the default view, 17 because that's the one I'm trying to -- trying to make 18 sure is running before I try to address whatever issue 19 they may specifically have. So I don't -- I don't want 20 to give you the false impression that people -- more 21 people customize it than not or more people use the 22 default version than not. I wouldn't know that 23 information.</p> <p>24 Q. Got it. I would need to ask, you know, an 25 actual end user --</p> <p style="text-align: right;">Page 43</p>	<p>1 was any questions asked like that, but if it -- if we 2 would answer a question like that, it would have been in 3 the -- in the context of a technical support question, 4 like how do I show minority numbers on districts, 5 something like that. And then we would explain, okay, 6 you push this button and this button and select this 7 field and that's how you see it, see that piece of 8 information.</p> <p>9 So in that context, we would have answered it, 10 but we wouldn't have told them, okay, you know, move 11 this over here and move that over there to make it 12 minority district. That would -- that I am -- I am 13 certain we did not do.</p> <p>14 Q. Got it. So you gave technical support to 15 Arkansas, which might have included a question about how 16 particular data such as racial data is displayed, but 17 Citygate did not help Arkansas, you know, move minority 18 or black voters to, you know, particular areas to 19 achieve particular goals?</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. So who -- I think you said on the -- on 22 the Citygate side, this engagement was primarily you. 23 Who were the primary folks you were working with on 24 the -- the client side?</p> <p>25 A. There were a few people. Shelby Johnson was</p> <p style="text-align: right;">Page 45</p>

<p>1 the primary person that we interacted with, but there 2 was also somebody -- there was a couple of people that I 3 regularly would call with questions or send emails. I 4 think I included everybody's emails.</p> <p>5 Q. And without -- I guess sort of without saying 6 their names, if -- if the answer is yes, did Citygate 7 directly engage with any legislators, any Arkansas 8 legislators in connection with the 2021 congressional 9 redistricting work?</p> <p>10 A. Not that I recall. I certainly don't recall 11 anybody calling and introducing themselves as a 12 legislator.</p> <p>13 Q. Got it. If we step back at a high level, 14 anything different about Citygate's engagement with 15 Arkansas on the 2021 congressional redistricting as 16 compared to Citygate's engagement with other states in 17 connection with their congressional redistricting?</p> <p>18 A. No. No, Arkansas was -- was more of the -- 19 they were more of the norm than they were an outlier.</p> <p>20 Q. And if we compare Citygate's work with 21 Arkansas in connection with the 2021 redistricting to 22 Citygate's prior work with Arkansas, any -- any 23 differences or any changes come to mind?</p> <p>24 A. No, I worked with -- with Shelby before and 25 worked with him again.</p> <p style="text-align: right;">Page 46</p>	<p>1 technical support?</p> <p>2 A. No, mostly -- mostly what they wanted to do 3 was produce hard copy maps, as far -- if I recall 4 correctly.</p> <p>5 Q. The Secretary of State's Office wanted to 6 produce hard copy maps?</p> <p>7 A. Yes.</p> <p>8 Q. Meaning, like, print out the maps from 9 AutoBound?</p> <p>10 A. Yeah, they wanted to print the maps.</p> <p>11 Q. Did they tell you why?</p> <p>12 A. No.</p> <p>13 Q. Did Citygate help them print the maps?</p> <p>14 A. I believe I guided -- the software does that. 15 They just needed -- needed the size to be larger. I 16 think they wanted 20 -- they wanted maybe 24-by-36-inch 17 maps, if I recall correctly. I'm just going by memory. 18 I may be incorrect, so I -- that's just what I remember.</p> <p>19 Q. Other than printing large -- you know, 20 printing hard copy large maps, any other requests to 21 Citygate that the Secretary of State's Office made?</p> <p>22 A. I didn't go through the emails. I just, as I 23 said, downloaded them and sent them -- sent them to you, 24 but they may have made -- had questions that they sent 25 us as far as how to do certain things or the</p> <p style="text-align: right;">Page 48</p>
<p>1 Q. Meaning your -- your primary contact was 2 Shelby Johnson both in the 2021 redistricting work and 3 in the prior congressional redistricting work?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. We'll go to Topic 2, which is 6 Citygate's interaction with the Arkansas Secretary of 7 State's Office in connection with the State of 8 Arkansas's 2021 congressional redistricting. Did 9 Citygate work with any folks at the Secretary of State's 10 Office?</p> <p>11 A. I believe so.</p> <p>12 Q. Can you tell us who those folks are?</p> <p>13 A. I can't remember the names off the top of my 14 head. During redistricting, we have many clients and we 15 basically field a lot of technical -- technical 16 questions. I do believe there were people at the 17 Secretary of State's Office that -- that we worked with 18 and if I go through my emails, I might be able to 19 identify them, but off the top of my head, I can't 20 remember the names.</p> <p>21 Q. Got it. And -- and you remember -- well, let 22 me rephrase that.</p> <p>23 Any particular requests that the Secretary of 24 State's Office made that were different than the 25 requests we just went through as far as for, you know,</p> <p style="text-align: right;">Page 47</p>	<p>1 functionality for doing certain things was in -- was in 2 the software. And I responded to by email or called 3 them and answered whatever questions they had, but I 4 don't remember off -- I don't recall anything that stood 5 out that's unusual.</p> <p>6 Q. Got it. And I'm not trying to, you know, quiz 7 you or anything. Obviously we have the emails. I'm 8 asking you because sometimes, you know, things happen 9 not in an email, or you know, over a phone call or -- or 10 other mechanism. So I want to make sure to get your -- 11 sort of your best recollection right now as you're 12 testifying.</p> <p>13 So just to recap, it sounds like other than 14 help with printing maps and maybe the typical type of 15 technical support questions that you get, any other 16 requests from the Secretary of State's Office to -- to 17 Citygate in connection with the redistricting work?</p> <p>18 A. Not that I specifically remember. Nothing 19 that stands out.</p> <p>20 Q. And earlier we listed what Citygate did and 21 did not do for Arkansas, meaning Citygate didn't help 22 draw maps, assess the maps, etcetera. Is that all true 23 with respect to the -- the Secretary of State's Office 24 as well?</p> <p>25 A. That's correct.</p> <p style="text-align: right;">Page 49</p>

<p>1 Q. Okay. We'll go next to Topic 3, which is 2 Citygate's interactions with the Arkansas Department of 3 Transportation and Shared Services, Division of 4 Geographic Information Systems, often called TSS in 5 connection with the State of Arkansas's 2021 6 congressional redistricting. Can you describe the 7 interaction that Citygate had with -- with TSS? 8 A. I don't remember having any specific 9 interactions with them. 10 Q. Okay. For Topic 4, that's Citygate's 11 interaction with the Arkansas Bureau of Legislative 12 Reappointment, BLR. Can you describe Citygate's 13 interactions with -- with BLR in connection with the 14 redistricting? 15 A. So just as a -- just as a general comment, I 16 don't know that I would have know specifically who was 17 with which department, so we may have interacted with 18 the individuals from question three and we may have 19 interacted with individuals from -- listed in Number 4 20 and I wouldn't have known that. They call, identify 21 themselves working with State of Arkansas under a 22 particular contract and ask questions and then we would 23 answer the questions. 24 We don't have a very -- because redistricting 25 is very busy, we don't have an extremely complex process</p> <p style="text-align: right;">Page 50</p>	<p>1 Management Group or Terry Benham, do either of those 2 ring a bell? 3 A. We didn't -- I definitely don't remember 4 speaking to anybody outside of -- of the state 5 meaning -- 6 Q. Got it. Sorry, you go. 7 A. If they -- if they contacted me saying I'm 8 with so-and-so company or so-and-so consulting group, I 9 don't recall having anybody identify themselves like 10 that. 11 Q. Your best recollection is that Citygate just 12 worked with Arkansas government employees, not third 13 parties like Impact Management Group or Terry Benham or 14 Richard Bearden don't ring bells? 15 A. Don't ring bells and we are generally careful 16 with avoiding -- unless we're specifically told to work 17 with somebody, we generally avoid that, because we don't 18 want to inadvertently provide client-privileged 19 information to third parties we're -- where we don't 20 know who they are. 21 Q. Got it. And to -- to the best of your 22 knowledge as you sit here today, for the Arkansas 2021 23 congressional redistricting, no third parties come to 24 mind? 25 A. No third parties come to mind.</p> <p style="text-align: right;">Page 52</p>
<p>1 for validating people asking questions. Most of the 2 times, we just want to get people going so that -- 3 because redistricting is timelines, that they get to 4 where they need to go as quickly as possible and end up 5 happy with the general results as far as our 6 participation goes. 7 MR. BRASCHER: Hey -- hey, Michael, really 8 quick, BLR is Bureau of Legislative Research. 9 MR. PIERCE: Thank you for clarifying that. 10 MR. BRASCHER: Yeah. 11 Q. (By Mr. Pierce) I was just going to say, 12 Mr. Hejazi, you like me, you don't have a -- you know, I 13 know you don't have, like, an org chart of the different 14 Arkansas governmental entities, so I -- if I can repeat 15 what I heard just to that I'm tracking, which is that 16 from Citygate's perspective, you have a contract with 17 Arkansas. You're then getting a lot of technical 18 support questions. You're just trying to field the 19 questions. You're not as much paying attention to this 20 person is with this particular division, this other 21 person is with this other particular division such that 22 the distinctions I just laid out between BLR and TSS are 23 not ones that you were really tracking. 24 A. Definitely not. 25 Q. Okay. Same question as to -- does Impact</p> <p style="text-align: right;">Page 51</p>	<p>1 Q. What about -- would members of the public also 2 fit in there? Any working with -- did Citygate interact 3 with, like, Arkansas voters as opposed to Arkansas state 4 government employees? 5 A. In the context -- in -- again, I don't 6 specifically remember, but in other states, we've had 7 members of the public contact us. 8 Q. So when Citygate is contracted with other 9 states not Arkansas, there has been interaction between 10 Citygate and the public. Was there that -- let me 11 rephrase. 12 Did Citygate interact with the public in 13 connection with the Arkansas 2021 redistricting? 14 A. I don't recall specifically, but if they -- if 15 they implemented the commenting part of the software 16 where they can publicly place plans or comment on plans 17 that were placed online, it's possible that members of 18 the public would have called to say something like, you 19 know, I put a comment and it's not showing up, something 20 like that, and that happens. 21 Q. Meaning if Citygate licensed to Arkansas this 22 -- you know, the online product, that then members of 23 the public used to comment on a draft map, you're saying 24 there's a chance that a member of the public could have 25 had a technical issue and then called Citygate to help</p> <p style="text-align: right;">Page 53</p>

<p>1 with that technical issue?</p> <p>2 A. Yes, it's possible. That has happened in</p> <p>3 other states. I don't know that it happened here. I</p> <p>4 don't have any specific recollection of it happening</p> <p>5 here, but I'm just saying it has happened before.</p> <p>6 Q. Got it. And other than that type of technical</p> <p>7 support access question from the public, any other</p> <p>8 interactions with the public in connection with the 2021</p> <p>9 Arkansas congressional redistricting?</p> <p>10 A. Not that I can remember. I'm not -- I can't</p> <p>11 guarantee that we didn't have calls about, you know,</p> <p>12 where can I download data, things like that, but nothing</p> <p>13 that was -- went beyond just one phone call.</p> <p>14 Q. Okay. We'll go to Topic 6 then, which is</p> <p>15 Citygate's role in communicating with, training or</p> <p>16 advising members of the Arkansas State or House of</p> <p>17 Representatives and/or legislative staff members</p> <p>18 regarding redistricting software in preparation for or</p> <p>19 in connection with the State of Arkansas's 2021</p> <p>20 congressional redistricting.</p> <p>21 So I'll pause for a second before I ask you a</p> <p>22 question, which is just I'm not going to ask you about</p> <p>23 the contents of specific conversations with legislators</p> <p>24 -- with legislators if you had any, but I will ask if</p> <p>25 you had any, if that -- if that distinction makes sense?</p> <p style="text-align: right;">Page 54</p>	<p>1 recollection here is that Citygate did these sort of</p> <p>2 special legislator trainings for other states, but not</p> <p>3 for Arkansas in connection with the 2021 congressional</p> <p>4 redistricting?</p> <p>5 A. Not that I recall. It's possible that we did</p> <p>6 it, but I do not recall.</p> <p>7 Q. Okay. And as you sit here today, you know,</p> <p>8 your best recollection, did any Arkansas legislator or</p> <p>9 legislative aide ask Citygate how to view or access</p> <p>10 racial demographic information?</p> <p>11 A. Not that I recall specifically.</p> <p>12 Q. Did any Arkansas legislator or legislative</p> <p>13 aide ask Citygate how to view political voting data?</p> <p>14 A. Not that I remember specifically. If it was</p> <p>15 something that was asked over email, I might have</p> <p>16 responded to it and provided the steps and link to the</p> <p>17 directions on the -- on our -- on our support site, but</p> <p>18 as I said, I don't remember specifically.</p> <p>19 Q. Got it. So I'll -- I'll rephrase to make sure</p> <p>20 I'm tracking, which is as you sit here today, your --</p> <p>21 your best recollection is that Citygate didn't have</p> <p>22 these interactions with legislators or legislative aids,</p> <p>23 but they -- you know, they -- questions could have come</p> <p>24 in over email or there -- let me pause there.</p> <p>25 Is that right?</p> <p style="text-align: right;">Page 56</p>
<p>1 A. Yes.</p> <p>2 Q. Okay. So I believe your testimony previously</p> <p>3 was that you provided -- you meaning Citygate, provided</p> <p>4 training to Arkansas. You don't know exactly who</p> <p>5 attended that training so there -- there could have been</p> <p>6 a legislator. Other than that, any interactions between</p> <p>7 Citygate and an Arkansas Senate or House of</p> <p>8 Representative legislator?</p> <p>9 A. Not specifically that I can recall.</p> <p>10 Q. In your other state engagements, does Citygate</p> <p>11 meet with state legislators?</p> <p>12 A. Sometimes.</p> <p>13 Q. When that happens, can you describe those</p> <p>14 interactions?</p> <p>15 A. Sometimes they set up training specifically</p> <p>16 for the -- for the legislators.</p> <p>17 Q. Can you describe those trainings?</p> <p>18 A. We just did -- we just show how the software</p> <p>19 works. They would have training that was specifically</p> <p>20 for -- for members of the legislature if they wanted to</p> <p>21 submit their own plans. So we would just set up a</p> <p>22 training session and it would be a little bit simpler,</p> <p>23 because we don't get into more technical things, and</p> <p>24 show them the basics of how to create a plan.</p> <p>25 Q. Got it. And is it your -- your best</p> <p style="text-align: right;">Page 55</p>	<p>1 A. Yes, and it's very possible -- we also go to</p> <p>2 conferences. It's very possible for members of the</p> <p>3 legislature to come up and ask questions. I wouldn't be</p> <p>4 able to necessarily identify them. They would just come</p> <p>5 and say, hey, I'm with Arkansas, this is my question and</p> <p>6 we would answer it.</p> <p>7 Q. Got it. That makes sense. You don't always,</p> <p>8 you know, know the -- the job or affiliation of everyone</p> <p>9 you're talking to at a conference. Fair to say, though,</p> <p>10 that sort of as you sit here today, to your knowledge,</p> <p>11 there's not a specific interaction between Citygate and</p> <p>12 an Arkansas legislator or legislative aide in connection</p> <p>13 with the 2021 congressional redistricting?</p> <p>14 A. Not that I recall.</p> <p>15 Q. Okay. We'll go to topic -- we'll go to Topic</p> <p>16 7 and spend a few minutes there and then maybe we can</p> <p>17 take our first quick break, if that sounds okay?</p> <p>18 A. Sure.</p> <p>19 Q. Okay. So Topic 7 is the integration of</p> <p>20 population data, including long demographic and</p> <p>21 political parameters into the redistricting software,</p> <p>22 specifically including autoBound EDGE used for the state</p> <p>23 of Arkansas's 2021 congressional redistricting.</p> <p>24 Could you sort of just walk us through your</p> <p>25 understanding of that question?</p> <p style="text-align: right;">Page 57</p>

<p>1 A. I guess you're asking us how that process is 2 done?</p> <p>3 Q. Yeah, I think -- I think that's right. So can 4 you just describe the population data that Citygate made 5 available for download by Arkansas in connection with 6 the 2021 redistricting?</p> <p>7 A. So the Census Bureau produces the geography 8 data, which is the boundaries of blocks and precincts 9 and counties and number of other layers of data that 10 they collect. Then they release the population data a 11 year later and then we go through a process of matching 12 the population data to each of the layers of geography 13 and tests to make sure they total up correctly, and then 14 we make that data available as I said online using the 15 format that the software uses.</p> <p>16 Q. Got it.</p> <p>17 A. That's the -- that's the population data.</p> <p>18 Q. So the -- and is that the same answer with 19 respect to the -- the demographic and racial data?</p> <p>20 A. Well, the demographic and racial data is 21 included in the population data.</p> <p>22 Q. Got it. Is -- is that the only data that 23 Citygate made available for Arkansas to download in 24 connection with the 2021 redistricting?</p> <p>25 A. Yes, I believe so.</p> <p style="text-align: right;">Page 58</p>	<p>1 data set, which ends up being about three hundred and 2 some columns of data, 312 I think columns of data, which 3 shows all the different categories of the racial 4 categories. Then it shows them by the total population 5 versus voting age population, and then it shows it by 6 Hispanic versus non Hispanic and then voting age versus 7 non-voting age.</p> <p>8 Q. Thank you. The different ways to slice and 9 dice the demographic answers, it sounds like there's an 10 answer that would correspond to, like, a single race, 11 black, non Hispanic, you know, person who fills out the 12 census, but then there's other -- other combinations 13 where someone could choose black and they could also 14 choose Hispanic or something else.</p> <p>15 How does AutoBound's default view showing 16 racial demographics, what -- what -- what is it used to 17 show the black demographics?</p> <p>18 A. We don't really show -- so really our job 19 isn't to show what is black and what is not black. We 20 simply show what is on the data from the Census Bureau. 21 So, you know, our default spreadsheet, we show different 22 combinations. I don't remember how many there are off 23 the top of my head, but we show different combinations 24 of individuals that singularly picked African American, 25 Asian, Hawaiian, Pacific Islander, American Indian and</p> <p style="text-align: right;">Page 60</p>
<p>1 Q. The -- and is this data sort of the standard 2 data that Citygate uses for -- that Citygate used for 3 its 2021 redistricting work with other states?</p> <p>4 A. Yes.</p> <p>5 Q. Did the other states Citygate worked with for 6 2021 congressional redistricting request different data 7 that reflected racial demographics?</p> <p>8 A. No, there isn't any other data.</p> <p>9 Q. Got it. Do you know how this -- this census 10 data defines black as a -- as a racial group?</p> <p>11 A. It's a fairly complicated process that the 12 Census Bureau uses and I would definitely refer you to 13 them, because that's the -- that's the source for the 14 information, but in a very, very simplistic explanation, 15 they break down the data as far as racial data goes into 16 one of six categories and then they combine them, so 17 because you can choose more than one racial category on 18 the census form, the -- the results also show that -- 19 show the information using the same -- same source.</p> <p>20 So, for example, for blacks, you have 21 individuals who single -- chose a single racial category 22 as African American and you have others who picked white 23 and black, others pick Hispanic and black and then 24 there's all different combinations of it, and all of 25 that stuff ends up showing on the -- on the resulting</p> <p style="text-align: right;">Page 59</p>	<p>1 Alaskan, Samoan, I think those were the different 2 categories.</p> <p>3 So we show all the individuals. Then we show 4 all the people that selected one or more races. Then 5 other people (Zoom distortion) and then we show the over 6 18, meaning voting age population and then we also show 7 Hispanic and non Hispanic. So we're not aggregating 8 anything. We're just showing what's in the data.</p> <p>9 Q. In the -- in the AutoBound software --</p> <p>10 A. Correct.</p> <p>11 Q. -- is what you're talking about?</p> <p>12 A. Correct.</p> <p>13 Q. Yeah, I guess what I'm trying to understand is 14 understanding that the -- the census data is enormous, I 15 think you said three hundred something columns, but you 16 need to make AutoBound user friendly in terms of you 17 create this default view that I imagine doesn't have 300 18 columns at the bottom of the screen.</p> <p>19 Can you describe for us the -- the process for 20 taking those 300 columns and displaying, you know, some 21 either more limited or aggregate information with 22 respect to racial demographic information?</p> <p>23 A. I don't know that we aggregate anything, 24 meaning we didn't add two columns together to make a new 25 column.</p> <p style="text-align: right;">Page 61</p>

<p>1 Q. Okay.</p> <p>2 A. So we just simply showed the columns that are</p> <p>3 most often populated.</p> <p>4 Q. And which --</p> <p>5 A. Most people pick one race, so those would tend</p> <p>6 to be more -- more -- more common columns, but again, it</p> <p>7 varies from state to state. You know, in -- in -- in</p> <p>8 the Pacific Northwest, the columns are a little bit</p> <p>9 different than, let's say, the columns you might look in</p> <p>10 if you're living in Oklahoma, so people change them. So</p> <p>11 that's why I'm saying the default one just shows the</p> <p>12 ones I just mentioned, the single race categories, and</p> <p>13 then some information about -- about people that picked</p> <p>14 one or two more -- two or more races and then we also</p> <p>15 show the same information for Hispanic, non Hispanic,</p> <p>16 same information for -- for voting age and total</p> <p>17 population.</p> <p>18 Q. So in Arkansas -- an Arkansas 2021 user of the</p> <p>19 AutoBound software, what would their default view</p> <p>20 showing racial demographics be?</p> <p>21 A. Default view would show -- I'm going to</p> <p>22 actually bring one up so I can tell you the exact</p> <p>23 numbers that show up, because I don't remember them off</p> <p>24 the top of my head and I don't want to -- it's -- the</p> <p>25 information is available easy enough that I can actually</p> <p style="text-align: right;">Page 62</p>	<p>1 what we're going to do here is my colleague Matthew is</p> <p>2 going to take a screenshot of this spreadsheet and then</p> <p>3 we will introduce it as an exhibit just so it can be</p> <p>4 clear sort of exactly what you have up on the screen and</p> <p>5 the -- you know, that your testimony is going to be --</p> <p>6 is going to be tied to it. So if we could do the --</p> <p>7 yeah, the first tab and then maybe the second tab and my</p> <p>8 colleague Matthew can take a screenshot of that second</p> <p>9 tab.</p> <p>10 A. Sure.</p> <p>11 Q. And then --</p> <p>12 A. Again, this is -- I can't -- I can't speak to</p> <p>13 whether Arkansas used this. This was just one of the</p> <p>14 spreadsheets that came with the software.</p> <p>15 Q. Got it. So make sure I'm understanding it,</p> <p>16 which is that when Citygate loaded the census data for</p> <p>17 Arkansas in connection with the 2021 redistricting, this</p> <p>18 spreadsheet reflects a default view of the data, and</p> <p>19 what you're saying is the Arkansas end user could have</p> <p>20 customized it to display something else in their</p> <p>21 particular AutoBound?</p> <p>22 A. Correct. And I'm looking at my -- my</p> <p>23 particular version of the software and I have 51</p> <p>24 different spreadsheets.</p> <p>25 Q. Okay.</p> <p style="text-align: right;">Page 64</p>
<p>1 just tell you. That's what happens, I guess, when you</p> <p>2 look at stuff four years later. Some of it isn't as</p> <p>3 readily available as you thought. Let me -- give me one</p> <p>4 second and find something here.</p> <p>5 Q. And are you -- are you going through your old</p> <p>6 emails or what are you --</p> <p>7 A. No, just looking at the software. I'm looking</p> <p>8 at the -- what the default spreadsheet looks like.</p> <p>9 Q. And can you -- could you share your screen</p> <p>10 using that -- I think there's a green arrow near the</p> <p>11 bottom of the Zoom?</p> <p>12 A. Sure. If I can find it I can do that. All</p> <p>13 right. Give me one second. Let me -- all right. So</p> <p>14 that's what it looks like. You would see the total</p> <p>15 population. There would be some sort of a target,</p> <p>16 meaning the total population divided by the number of</p> <p>17 districts. Then it shows the deviation from that and</p> <p>18 the difference of many populate -- how many people you</p> <p>19 have, and then there's white, black, Hispanic, minority,</p> <p>20 which is -- which is everything other than white, and</p> <p>21 then voting age and then racial demographics as a</p> <p>22 percentage of voting age population, again, white,</p> <p>23 black, Hispanic.</p> <p>24 Q. Thank you, Mr. Hejazi. So just because the --</p> <p>25 sort of the formalities of a deposition, I think what --</p> <p style="text-align: right;">Page 63</p>	<p>1 A. So that's what I'm saying, even for me, I have</p> <p>2 51 different ones that I -- that I created. So this --</p> <p>3 this is the default, but it is by no means necessarily</p> <p>4 the one that they used.</p> <p>5 Q. Got it. And can we go to that second tab for</p> <p>6 a second so my colleague can grab a --</p> <p>7 A. Sure.</p> <p>8 Q. -- shot of that? And then if we could go to</p> <p>9 the -- the third tab.</p> <p>10 A. It's basically the same thing, just voting age</p> <p>11 population.</p> <p>12 Q. Got it. Okay.</p> <p>13 MR. GOLDSTEIN: I'm just going to need a</p> <p>14 second for this one, so if we could just keep this up</p> <p>15 for -- for just for a second.</p> <p>16 THE WITNESS: Sure.</p> <p>17 MR. GOLDSTEIN: Okay. Got that.</p> <p>18 Q. (By Mr. Pierce) Okay. Mr. Hejazi, if we</p> <p>19 could go back to the first -- the first tab, population</p> <p>20 goals.</p> <p>21 MR. PIERCE: And so the record is -- excuse</p> <p>22 me, the record is clear, Mr. Hejazi brought up a spread</p> <p>23 called default 2020 census dot --</p> <p>24 THE REPORTER: I'm sorry -- I'm sorry,</p> <p>25 Michael. Could you go back to what the spreadsheet is</p> <p style="text-align: right;">Page 65</p>

<p>1 called? I lost part of your audio.</p> <p>2 MR. PIERCE: Sorry, so Mr. Hejazi has pulled</p> <p>3 up a spreadsheet titled Default 2020 Census.xlsx. It is</p> <p>4 an Excel file with three tabs; population totals, racial</p> <p>5 demographics and voting age.</p> <p>6 Q. (By Mr. Pierce) Is that right, Mr. Hejazi?</p> <p>7 A. Yes.</p> <p>8 Q. And -- and this spreadsheet I believe you said</p> <p>9 is -- represents the -- the default view that would have</p> <p>10 been in AutoBound for the 2021 congressional</p> <p>11 redistricting for Arkansas as far as displaying racial</p> <p>12 data from the census?</p> <p>13 A. Correct. It would have been a starting point.</p> <p>14 Q. Got it. Okay.</p> <p>15 MR. PIERCE: And so I think, Matthew, let us</p> <p>16 know when you can put the screenshots into Exhibit Share</p> <p>17 and then we'll -- we'll switch to those --</p> <p>18 MR. GOLDSTEIN: They're all in. They're ready</p> <p>19 to be introduced.</p> <p>20 Q. (By Mr. Pierce) Okay. Great. Mr. Hejazi, if</p> <p>21 you could pull down the spreadsheet and then we will</p> <p>22 basically look at the same thing, but -- but just</p> <p>23 screenshots so it's sort of an easier record for us.</p> <p>24 A. Sure.</p> <p>25 Q. Okay. So if you go into Exhibit Share.</p> <p style="text-align: right;">Page 66</p>	<p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 MR. PIERCE: Matthew, do we want to put --</p> <p>4 could you bring up the second -- the screenshot of</p> <p>5 the -- the second tab of the spreadsheet.</p> <p>6 MR. GOLDSTEIN: Yeah, I will introduce that in</p> <p>7 awhile. That should appear any second. Should be in</p> <p>8 there now.</p> <p>9 Q. (By Mr. Pierce) Okay. So, Mr. Hejazi, what</p> <p>10 -- I think what should be in the Exhibit Share now is</p> <p>11 what's marked as Exhibit 3.</p> <p>12 (Deposition Exhibit No. 3 was marked for</p> <p>13 identification and made part of the record.)</p> <p>14 Q. (By Mr. Pierce) which is the second tab of</p> <p>15 the spreadsheet we were previously discussing; is that</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. And can you similarly describe for us the</p> <p>19 columns on the spreadsheet that correspond to black, the</p> <p>20 black individuals?</p> <p>21 A. It's the same. It's the same information as</p> <p>22 what's on the first page -- I mean, first tab.</p> <p>23 Q. Great. Okay. I think we can -- we can keep</p> <p>24 going then. Question, Mr. Hejazi, do you have any other</p> <p>25 documents or data that -- that you were reviewing as</p> <p style="text-align: right;">Page 68</p>
<p>1 MR. PIERCE: And, Matthew, what -- are these</p> <p>2 marked with a particular number?</p> <p>3 MR. GOLDSTEIN: The first tab will be Exhibit</p> <p>4 2 and I've just put it in the folder.</p> <p>5 MR. PIERCE: Great.</p> <p>6 Q. (By Mr. Pierce) So, Mr. Hejazi, can you open</p> <p>7 up Exhibit 2?</p> <p>8 (Deposition Exhibit No. 2 was marked for</p> <p>9 identification and made part of the record.)</p> <p>10 A. Okay.</p> <p>11 Q. (By Mr. Pierce) So Exhibit 2 is the first tab</p> <p>12 of that spreadsheet that you pulled up; is that right?</p> <p>13 A. Yes.</p> <p>14 Q. So I see on that -- on Exhibit 2, it says --</p> <p>15 it says black. Can you explain to us which of the</p> <p>16 different census permutations leads to this black?</p> <p>17 A. It's black alone.</p> <p>18 Q. Black alone. Okay. So the -- the default</p> <p>19 view for an Arkansas 2021 congressional redistricting</p> <p>20 map drawer in AutoBound would -- when it's displaying</p> <p>21 information about black people, it's talking about black</p> <p>22 alone from the -- the census data; is that rate?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And is that -- is that the same for the</p> <p>25 other tabs in that spreadsheet also go to black alone?</p> <p style="text-align: right;">Page 67</p>	<p>1 part of your testimony?</p> <p>2 A. No.</p> <p>3 Q. Okay.</p> <p>4 MR. PIERCE: Okay. I think we can have a -- I</p> <p>5 think we can pause -- pause right now. It's I believe</p> <p>6 11:45 Eastern. If we could take a 15-minute break and</p> <p>7 return at 12 Eastern, we could then go for more or less</p> <p>8 another hour and then maybe take a late lunch at 1:00</p> <p>9 Eastern.</p> <p>10 Does that work for you, Mr. Hejazi?</p> <p>11 THE WITNESS: Sure.</p> <p>12 THE VIDEOGRAPHER: Let me get off the record,</p> <p>13 everybody. We are off the record at 10:44 a.m.</p> <p>14 (A recess was taken from 10:44 a.m. to</p> <p>15 11:01 a.m.)</p> <p>16 THE VIDEOGRAPHER: We are back on the record</p> <p>17 at 11:01 a.m.</p> <p>18 MR. PIERCE: Thanks, everybody.</p> <p>19 Q. (By Mr. Pierce) So, Mr. Hejazi, we're going</p> <p>20 to move to Topic No. 8, which is the integration of</p> <p>21 voting data, including along demographic and political</p> <p>22 parameters into the redistricting software used for the</p> <p>23 State of Arkansas's 2021 congressional redistricting.</p> <p>24 I know we -- we touched on this topic already</p> <p>25 in your testimony, but just to -- to reiterate, can you</p> <p style="text-align: right;">Page 69</p>

<p>1 describe what voting data, if any, Citygate loaded into 2 AutoBound for the state of Arkansas's 2021 congressional 3 redistricting? 4 A. To my knowledge, we didn't load anything. 5 Q. Got it. And I believe your testimony was that 6 it's possible for Arkansas to itself load any data, 7 including voting data, into its own, like, into 8 AutoBound, but as far as -- you know, as far as you 9 know, they didn't do that or at least didn't ask for 10 your help -- didn't ask for Citygate's help with it and 11 didn't ask Citygate questions about it? 12 A. Not that I recall. 13 Q. Okay. Did Arkansas in prior years, meaning 14 prior to the 2021 redistricting work with Citygate to 15 load voting data? 16 A. Not that I recall. 17 Q. Okay. For Topic 9 then, Topic 9 is the 18 functionality of the redistricting software specifically 19 including autoBound EDGE used for the State of 20 Arkansas's 2021 congressional redistricting, the 21 reports, analyses, and databases which could be 22 generated and the information which was accessible by 23 users of the software. 24 So, first, could you start just with sort of a 25 high level -- give us a high level overview of the types</p> <p style="text-align: right;">Page 70</p>	<p>1 -- the census data, which included all those columns 2 that for you is -- it is different than what an Arkansas 3 user could actually, you know, see in their AutoBound, 4 that would depend on how they configured it themselves, 5 but the default view within AutoBound of what they could 6 see would be -- would correspond to Exhibits 2 and 3 7 that we just discussed? 8 A. Yes. 9 Q. What level of granularity would autoBound EDGE 10 display in terms of racial demographics? So, like, 11 would it show this information at the county level? 12 A. Yes. 13 Q. Would it show racial demographic information 14 at the precinct level? 15 A. Yes. 16 Q. And would it show racial demographic -- racial 17 demographic information at the census block level? 18 A. Yes. 19 Q. I mean, how -- how did autoBound EDGE display 20 this information on a -- on a default view, meaning did 21 it update when a user drew a draft map? 22 A. The map -- the boundaries that the -- that the 23 user would be created -- that the user would have 24 created could be constructed using any combination of 25 county, precinct and blocks, census blocks, and the</p> <p style="text-align: right;">Page 72</p>
<p>1 of information regarding racial demographics that would 2 be available to the Arkansas users of AutoBound as part 3 of the 2021 congressional redistricting? 4 A. It would have been the same thing that the 5 Census Bureau produces as a -- as a part of their P.L. 6 90 -- the -- sorry, the redistricting data set that the 7 Census Bureau produces, 94 -- P.L. 94-171. 8 Q. And that was I believe what -- what were 9 Exhibits 2 and 3 -- Exhibits 2 and 3 showed what an 10 Arkansas user that had the default view of AutoBound 11 would have seen in terms of racial demographic 12 information? 13 A. No, your question was what data was provided 14 to them. The data that was provided to them was the 15 same thing that the Census Bureau provided, which was 16 all of the columns of redistricting data. 17 The data that they would have elected to see 18 out of that data set was what -- what I was showing to 19 you in the spreadsheet as a -- as a starting point or as 20 a default. They could have chosen something else to 21 see. 22 Q. Got it. So that makes sense. I'll just make 23 sure I'm understanding, which is that the -- the 24 demographic data that Citygate made available to 25 Arkansas was the -- you know, the full set of the census</p> <p style="text-align: right;">Page 71</p>	<p>1 totals would be shown for the district calculated across 2 all of those levels. 3 Q. Got it. So -- so -- pardon me. As a user -- 4 let me see. So for the -- for AutoBound as it was set 5 up for the State of Arkansas 2021 congressional 6 redistricting, if an Arkansas user drew a draft map in 7 AutoBound, they would be able to see in AutoBound racial 8 information at the county, precinct and census block 9 level? 10 A. You're asking the question in a way that -- in 11 a way that doesn't -- doesn't -- is inconsistent with 12 the way redistricting is done. You can see the data for 13 county, precinct and blocks whether you're drawing or 14 you're not drawing. It's just information -- you're 15 asking information. 16 When you draw a boundary, the information is 17 shown for the boundary that you've drawn. It doesn't 18 matter what it was made of. 19 Q. Got it. Okay. So is it the case that -- let 20 me try to ask a better question then. If an Arkansas 21 user drew -- drew a boundary at the county level, the 22 Arkansas user in AutoBound would be able to see racial 23 demographics at the county level? 24 A. That's what I'm saying. It doesn't -- the -- 25 once you draw the boundary, it doesn't really matter</p> <p style="text-align: right;">Page 73</p>

<p>1 what you use to build it, you see the numbers for the 2 boundary. Whatever the -- whatever the geography was 3 used to make it is irrelevant to displaying the data. 4 The data is always shown for the geography that is -- 5 that makes up the district. Whether it's a county, 6 whether it's a county and a couple of blocks, whether 7 it's a county minus 10 blocks, whatever it is, that's 8 what the -- the numbers show the information for the 9 geography that you've drawn.</p> <p>10 Q. I think I understand, but I want to try and 11 make sure, which is that in AutoBound, the Arkansas user 12 could -- could draw a map and could draw the boundaries 13 of that map at the county level, precinct level or 14 census block level.</p> <p>15 Is -- is that part right?</p> <p>16 A. Or any combination thereof.</p> <p>17 Q. Got it. Okay. So the Arkansas user could 18 draw the map boundary at the county level, precinct 19 level, census block level, or any combination of -- of 20 those three; is that right?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. So the Arkansas user can draw the map 23 boundary in that way. Regardless of how they draw the 24 map boundary, the Arkansas user could see racial 25 demographic information at either the county level, the</p> <p style="text-align: right;">Page 74</p>	<p>1 A. And you can't split blocks.</p> <p>2 Q. Okay. I'm going to -- thank you for bearing 3 with me. I'm going to try it again to see if I'm 4 understanding, which is that a user of -- you know, an, 5 Arkansas user of AutoBound in 2021, when they drew a 6 draft map in AutoBound, AutoBound would show them the 7 racial demographic information for the map that they 8 drew; is that right?</p> <p>9 A. Yes, for the -- for the district that they 10 drew.</p> <p>11 Q. For the district that they drew. Okay. And 12 then separate from -- you know, separate from the map -- 13 well, I guess let me clarify. And they could draw that 14 map such that it -- it -- you know, it intersect -- you 15 know, it -- it cut -- let me see.</p> <p>16 They could draw that map in AutoBound such 17 that it cuts through counties and precincts, but it has 18 to include whole census blocks; is that right?</p> <p>19 A. That's correct.</p> <p>20 Q. Okay. So that's how they can draw the map and 21 regardless of how they draw the map, the -- AutoBound 22 will display the racial demographic information for the 23 map that they've drawn?</p> <p>24 A. For the district that they've drawn.</p> <p>25 Q. For the district that they've drawn. Okay.</p> <p style="text-align: right;">Page 76</p>
<p>1 precinct level, or the census block level, is that -- do 2 I have that right?</p> <p>3 A. It's irrelevant to the drawing part. That's 4 the -- that's the distinction. So when you're -- when 5 you're drawing the boundary, you simply see the totals 6 for that district. You don't see how much was a county, 7 how much was a precinct, and how much was a block. You 8 just see the total. That's the distinction.</p> <p>9 Q. Got it. So --</p> <p>10 A. It's a trivial -- it's a trivial distinction, 11 but it is a distinction nonetheless and it -- it matters 12 only that when you're drawing, you can select from any 13 level of geography and it doesn't really matter, just 14 the totals change.</p> <p>15 Q. So if you're -- if a user draws a 16 congressional district and it cuts through a particular 17 -- you know, it has -- it cuts through a particular 18 county, a particular precinct, and particular census 19 blocks and they draw that draft congressional district, 20 does AutoBound display the racial demographics for the 21 -- the district that they've just drawn?</p> <p>22 A. Yes, and not for those pieces.</p> <p>23 Q. Got it. Okay. So --</p> <p>24 A. And you can't split --</p> <p>25 Q. Right.</p> <p style="text-align: right;">Page 75</p>	<p>1 And then separate from the drawing, if the user just 2 wanted to see racial demographic data, they could see 3 that data in autoBound EDGE at the county level, 4 precinct level, and census block level; is that right?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. When a user in AutoBound has a draft 7 map and then they change the boundaries of that draft 8 map, does the racial demographic information 9 automatically, like, update or refresh?</p> <p>10 A. As they change it?</p> <p>11 Q. Yes.</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So if an Arkansas user drew a 14 particular draft map, AutoBound would display the racial 15 demographic information and then if that user changed 16 the boundaries of that draft map, the AutoBound software 17 would update the racial demographic information to 18 reflect the new district; is that right?</p> <p>19 A. Hypothetically, that's correct, but it's not 20 -- I don't know that they did that. They could have had 21 -- they could have configured it so they're not looking 22 at racial demographics. I can't testify to whether they 23 did or did not do that.</p> <p>24 Q. Got it. Understood.</p> <p>25 A. Okay.</p> <p style="text-align: right;">Page 77</p>

<p>1 Q. But what we're saying is that you can -- you 2 can testify as to how the software is set up and its 3 functionality or not --</p> <p>4 A. Correct. I can testify to the software -- how 5 the software could be set up if they had racial 6 demographics on and they drew a district, the -- the 7 population information would update, as well as any 8 other columns of data that they chose to display. That 9 includes demographics or anything else they chose to 10 display.</p> <p>11 Q. Got it. And so I think you can -- correct me 12 if I'm wrong, you can also testify to the -- the default 13 AutoBound settings that were loaded for the State of 14 Arkansas's 2021 congressional redistricting; is that 15 right?</p> <p>16 A. Yes, that is the default that comes with the 17 software.</p> <p>18 Q. Okay. So just to make sure my -- my 19 understanding is clear, the default AutoBound settings 20 that were used -- let me -- let me start again.</p> <p>21 The default AutoBound settings for the 22 AutoBound that was licensed to Arkansas in connection 23 with the 2021 congressional redistricting, those default 24 settings would display racial information for draft maps 25 that the user created and would update that racial</p> <p style="text-align: right;">Page 78</p>	<p>1 particular AutoBound?</p> <p>2 A. I can't -- yes, I can't comment on what 3 individual users configured the system to view. I can't 4 even comment between users. So if you -- if you make a 5 map on one system and you start to show minority or 6 whatever formulation you decide to view and then you 7 take that map over to somebody else's machine that has 8 configured theirs differently, then the information -- 9 the information about racial demographics or whatever 10 the other first person had won't display on the second 11 person's computer.</p> <p>12 Q. As far as the default settings in AutoBound 13 coupled with the data that Citygate made available to 14 Arkansas in connection with the 2021 congressional 15 redistricting, is it fair to say that the default 16 AutoBound setting with that data would display as users 17 were drawing draft maps, racial demographic information 18 about the districts they were creating and would not 19 display information about voting patterns?</p> <p>20 A. If -- yes, but I -- we were -- you're -- 21 you're -- you're very much tying things to the default 22 version. It was really the starting point version. So 23 most people customize things, so I don't know that I 24 would necessarily call it the default version. It's 25 much more the starting point that we provided, just</p> <p style="text-align: right;">Page 80</p>
<p>1 information if the user changed the borders of the draft 2 map; is that right?</p> <p>3 A. That's generally correct.</p> <p>4 Q. Okay. If I'm trying to understand it on a 5 basic level, is it -- is it fair to describe the -- the 6 racial information, the default view -- let me start 7 again.</p> <p>8 Is it fair to describe the default setting of 9 AutoBound in terms of displaying racial demographic 10 information on the bottom of the screen as a sort of 11 ticker that will update automatically when the user, you 12 know, draws a draft map or changes an existing draft 13 map?</p> <p>14 A. Assuming -- assuming that the user has 15 configured the system to show that information. All 16 information that's shown in that spreadsheet is updated 17 as maps are changed.</p> <p>18 Q. Yeah, so AutoBound updates it in real time --</p> <p>19 A. Correct.</p> <p>20 Q. -- but if -- yeah, so whatever information the 21 user has decided to display is updated in real time as 22 they're changing draft maps, etcetera?</p> <p>23 A. Yes.</p> <p>24 Q. And your point is, you can't know what any 25 individual user configured -- how they configured their</p> <p style="text-align: right;">Page 79</p>	<p>1 something that if they wanted to edit, they would have 2 something to start with.</p> <p>3 I don't know, as I said, whether Arkansas did 4 or did not change it or what they did to it, but if they 5 didn't change it, then that is correct. They would -- 6 it would show the spreadsheet that we looked at earlier.</p> <p>7 Q. Got it. So you're -- you're more comfortable 8 with framing it as a starting point as opposed to a 9 default, because it was -- your understanding is that 10 many users customize their -- their view within 11 AutoBound?</p> <p>12 A. More people customize it than didn't customize 13 it as far as -- as far as I saw.</p> <p>14 Q. Got it. Got it. Okay. But the -- if I try 15 and recap again using the -- your preferred language, 16 it's that the -- the AutoBound software was sort of the 17 starting -- the starting -- I'm sorry, what -- what did 18 you call it? It wasn't the default. It was --</p> <p>19 A. Start -- it was a starting point.</p> <p>20 Q. Starting point. Okay. So the information-- 21 the AutoBound software for the State of Arkansas in the 22 2021 redistricting, as a -- you know, as an initial 23 starting point, it would display racial demographic 24 information when a user was drawing a draft district, it 25 would update that information if they change the draft</p> <p style="text-align: right;">Page 81</p>

<p>1 district and it did not include -- the starting point 2 did not include any similar information about voting 3 patterns? 4 MR. BRASCHER: I'm just going to object to the 5 form. 6 Q. (By Mr. Pierce) Sorry, Mr. Hejazi. Let me -- 7 let me try that again. The -- the starting point for 8 the autoBound EDGE software that Citygate licensed to 9 the Arkansas -- to Arkansas for the 2021 redistricting, 10 the starting point for the view of that software was to 11 display racial demographic information when a user drew 12 a draft district or updated a draft district; is that 13 right? 14 A. The starting point -- the starting point was 15 the spreadsheet that I -- that I showed -- that I -- 16 that we -- that I showed you and was entered into 17 exhibit. I have -- the users could start with that. 18 They could make a modification before they drew plans. 19 They could make a modification once they started drawing 20 plans. They could make the modification at the end to 21 review their plans. 22 So there's -- that's the reason why I'm 23 calling it a starting point is because we just provided 24 something so that they wouldn't start something and have 25 no data showing.</p> <p style="text-align: right;">Page 82</p>	<p>1 A. That's correct. I don't recall that we did 2 that for -- for State of Arkansas. 3 Q. So is it right that the -- the starting point 4 for the AutoBound software that was licensed to Arkansas 5 would be the -- an Arkansas user when they're drawing a 6 draft map in AutoBound, AutoBound would not display 7 information about voting? 8 A. No, by default, it would not. By, you know, 9 using the -- the installation of the software without 10 making any changes to it, it would not display any 11 voting data. 12 Q. Got it. Okay. We're now going to shift to 13 going through some more exhibits, so these -- most of 14 these are going to be part of the set of emails you 15 shared with us. 16 MR. PIERCE: So I'll ask my colleague Matthew 17 to put in the Exhibit Share I think, Matthew, what is 18 Exhibit 4 now? 19 MR. GOLDSTEIN: Yeah, Exhibit 4. It will be 20 up in a moment. 21 (Deposition Exhibit No. 4 was marked for 22 identification and made part of the record.) 23 Q. (By Mr. Pierce) All right. Mr. Hejazi, are 24 you able to access that? 25 A. It's not loaded yet. Okay. There it goes.</p> <p style="text-align: right;">Page 84</p>
<p>1 Q. Understood. So the -- the -- the starting 2 point of the software, understanding that users could 3 modify it at any time, was to display the racial 4 demographic information when a user drew a draft 5 district and -- and to update that information when the 6 user revised the draft district? 7 A. Yes. 8 Q. And the -- the starting information for the 9 AutoBound software did not include that similar 10 information for voting patterns? 11 A. It wouldn't include the information for voting 12 patterns because voting patterns are -- are, by their 13 definition, different from state to state. 14 Q. Different from state to state meaning? 15 A. Well, some states will hold elections at 16 different times and will -- some -- the field names are 17 going to be different from state as to state, so it's 18 not -- it's an entirely localized data set, so it is not 19 something that we can pre-define. 20 Q. Got it. So with respect to the starting point 21 of the AutoBound software that was licensed to Arkansas, 22 I -- I believe your -- your testimony was that you 23 didn't -- you didn't recall Citygate providing Arkansas 24 with voting information as part of the 2021 25 congressional redistricting; is that -- is that right?</p> <p style="text-align: right;">Page 83</p>	<p>1 Q. Okay. Exhibit 4 is a document with a Bates 2 stamp ending in 14078. It's an August 13, 2020, email 3 chain between you and various Arkansas employees with 4 the subject Availability of 2020 Census For Use in 5 AutoBound EDGE; is that right? 6 A. Yep. 7 Q. Do you recognize this email chain? 8 A. Not specifically, but I -- it's from me -- 9 from me to Shelby, so I'm -- I recognize it generally. 10 Q. Great. Can you take a second to review it and 11 then sort of explain to us what's going on at this point 12 in time with respect to autoBound EDGE and the Arkansas 13 redistricting? 14 A. I believe this is about the fact that the data 15 from the Census Bureau was made available and we 16 processed it and put it on our download site, as well as 17 upgrade the software to work with it. 18 Q. And can you walk us through what this new 19 census data was, what the update was? 20 A. Because of COVID, the data was late. You can 21 see this is dated August 13. Normally the census data 22 is supposed to be out in April, and because of the 23 lateness, I believe we had made available for states 24 that wanted to play around with the software, but we did 25 not have the -- because of the census data not being</p> <p style="text-align: right;">Page 85</p>

<p>1 available, didn't have data.</p> <p>2 We made the American Community Survey Data</p> <p>3 available and we made the software be able to work with</p> <p>4 that, with the CS data, and then -- so this is talking</p> <p>5 about the fact that the PL data is now available and the</p> <p>6 software has been upgraded to work with the correct</p> <p>7 version of the census data and this is the procedure to</p> <p>8 downloading the data and the -- the software.</p> <p>9 Q. So as of, you know, August 13th, 2021, once</p> <p>10 the Arkansas users downloaded the Census Bureau data,</p> <p>11 the data that would be in their AutoBound, including the</p> <p>12 demographic data, would -- you know, would update to be</p> <p>13 this more current data?</p> <p>14 A. Yes.</p> <p>15 Q. And these -- these folks listed in the -- in</p> <p>16 the "to" line, could you just sort of describe who each</p> <p>17 of them are and interactions you had with them?</p> <p>18 A. I don't -- I mean, the only name that I</p> <p>19 recognize is Shelby. Whoever else was on there was</p> <p>20 probably individuals that I were -- we were asked to</p> <p>21 include in our communication.</p> <p>22 Q. Got it. And the -- that fourth sentence in</p> <p>23 your -- in your paragraph -- or in your -- in your email</p> <p>24 that says, "If you wish to add political data or modify</p> <p>25 the database, you can download the entire processing</p> <p style="text-align: right;">Page 86</p>	<p>1 know when you can see the exhibit.</p> <p>2 A. Yeah, it's not there yet. All right. Got it.</p> <p>3 Q. Okay. Exhibit 5 is a document with a Bates</p> <p>4 stamp ending in 14235. It's a January 11, 2021, email</p> <p>5 between you and Shelby Johnson with the subject Arkansas</p> <p>6 Meeting With Bureau of Legislative Research; is that</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recognize this email chain?</p> <p>10 A. Again, not specifically, but I do -- I -- it's</p> <p>11 from me to Shelby regarding some sort of a training or</p> <p>12 questions that they had.</p> <p>13 Q. Marty Garrity, the -- the director of the</p> <p>14 Bureau of Legislative Research, can you explain Marty's</p> <p>15 in the Bureau of Legislative Research's role in the</p> <p>16 redistricting work as far as you know?</p> <p>17 A. Other than being a user of the software, I</p> <p>18 couldn't tell you what she did.</p> <p>19 Q. Okay. We will pull up the next exhibit then.</p> <p>20 MR. GOLDSTEIN: This will be Plaintiff's</p> <p>21 Exhibit 6.</p> <p>22 (Deposition Exhibit No. 6 was marked for</p> <p>23 identification and made part of the record.)</p> <p>24 Q. (By Mr. Pierce) And, again, let me know when</p> <p>25 you can see it.</p> <p style="text-align: right;">Page 88</p>
<p>1 folder which we used to generate your database.</p> <p>2 Instructions on how to use this database are provided."</p> <p>3 A. Yeah.</p> <p>4 Q. What did you mean by political data?</p> <p>5 A. Voter data or election results.</p> <p>6 Q. Got it. And -- and I know we've talked about</p> <p>7 this before, but -- pardon, to your knowledge, Arkansas</p> <p>8 didn't have, as far as you know, political data --</p> <p>9 excuse me, to their autoBound EDGE?</p> <p>10 A. Yeah, this email didn't just go out to Shelby.</p> <p>11 This was in four -- this email was not specific to</p> <p>12 Arkansas. This is just one that went out to everybody.</p> <p>13 Q. Meaning Citygate's other clients all --</p> <p>14 A. Correct.</p> <p>15 Q. -- got a copy and paste of this email to</p> <p>16 Citygate's other clients?</p> <p>17 A. Yeah, this was just a general email that went</p> <p>18 out to everybody.</p> <p>19 Q. Got it.</p> <p>20 MR. PIERCE: Okay. I think, Matthew, we can</p> <p>21 pull up the next -- the next exhibit.</p> <p>22 MR. GOLDSTEIN: This will be Exhibit 5.</p> <p>23 (Deposition Exhibit No. 5 was marked for</p> <p>24 identification and made part of the record.)</p> <p>25 Q. (By Mr. Pierce) Okay. So Mr. Hejazi let me</p> <p style="text-align: right;">Page 87</p>	<p>1 A. Got it.</p> <p>2 Q. Okay. Plaintiff's -- Plaintiff's Exhibit 6 is</p> <p>3 a document with a Bates stamp ending in 15017. It's a</p> <p>4 February 12th, 2021, email from Shelby Johnson to you</p> <p>5 subject Arkansas Population Report attaching a PDF title</p> <p>6 -- with a file name 2019 Population Report; is that</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recognize this email chain?</p> <p>10 A. Again, the same thing. I recognize the fact</p> <p>11 that I -- I recognize that, you know, this is an email</p> <p>12 exchange from -- from Shelby to be, but I -- I don't</p> <p>13 specifically remember what it was about.</p> <p>14 Q. Got it. So we can pull up the next exhibit,</p> <p>15 which is the -- the PDF that's attached to this email.</p> <p>16 MR. GOLDSTEIN: This will be Plaintiff's</p> <p>17 Exhibit 7.</p> <p>18 (Deposition Exhibit No. 7 was marked for</p> <p>19 identification and made part of the record.)</p> <p>20 Q. (By Mr. Pierce) Let me know when you can see</p> <p>21 it.</p> <p>22 A. Yeah, still not there yet.</p> <p>23 MR. GOLDSTEIN: Looks like the file is a</p> <p>24 little bigger. It may take a couple of seconds.</p> <p>25 A. Yeah, it's taking awhile to load. Okay.</p> <p style="text-align: right;">Page 89</p>

<p>1 Yeah, actually, I do remember this.</p> <p>2 Q. (By Mr. Pierce) okay. So we have up exhibit</p> <p>3 --</p> <p>4 MR. PIERCE: You say this is Exhibit 7,</p> <p>5 Matthew?</p> <p>6 MR. GOLDSTEIN: Yes, Exhibit 7.</p> <p>7 Q. (By Mr. Pierce) okay. Exhibit 7, which is a</p> <p>8 document with a Bates stamp ending in 15018. The -- the</p> <p>9 first page of this document is titled 2019 Estimated</p> <p>10 Population by County; is that right, Mr. Hejazi?</p> <p>11 A. Yeah.</p> <p>12 Q. And do you recognize this document?</p> <p>13 A. Yeah.</p> <p>14 Q. What is it?</p> <p>15 A. Shelby had made some maps. We talked about it</p> <p>16 on the phone and he said -- and I think I asked him, I'd</p> <p>17 like to see the maps you made, and then he sent them to</p> <p>18 me.</p> <p>19 Q. Did he -- did he tell you why he made the</p> <p>20 maps?</p> <p>21 A. No, I think it was just a general conversation</p> <p>22 we were having, because this is before the redistricting</p> <p>23 data had been released, so they were using some of the</p> <p>24 ACS data to make some estimates as far as which counties</p> <p>25 had grown by population and I was -- and it was just --</p> <p style="text-align: right;">Page 90</p>	<p>1 to -- as I said, which areas had grown and which had</p> <p>2 reduced in population. And he said, yeah, we did that</p> <p>3 analysis and he send me this batch. I didn't really</p> <p>4 discuss it with him after I received it.</p> <p>5 Q. So if you go back a few pages in the PDF, so</p> <p>6 if you go to the PDF with the -- the stamp on the bottom</p> <p>7 right that's CMA_0015028.</p> <p>8 A. Yep.</p> <p>9 Q. And it says 2010 to 2019 Estimated Population</p> <p>10 Change by County. Is this the information you were</p> <p>11 looking for?</p> <p>12 A. Yeah, I wasn't looking. Again, when you're</p> <p>13 doing redistricting in general, you like to know about</p> <p>14 the geography of the country; which areas have grown,</p> <p>15 which areas have shrunk, where do you expect things to</p> <p>16 go. So it was just more for my knowledge than anything</p> <p>17 else.</p> <p>18 It was not particularly tied to any kind of a</p> <p>19 -- any kind of a project and this is -- yeah, this -- I</p> <p>20 was looking at this and then also the -- the maps that</p> <p>21 were in the beginning of the series with the -- with the</p> <p>22 actual population, where it was -- where were the big</p> <p>23 counties, which ones had grown and which ones had</p> <p>24 shrunk.</p> <p>25 Q. Why is it helpful to know the population</p> <p style="text-align: right;">Page 92</p>
<p>1 it was just a question of curiosity for me. I wanted to</p> <p>2 know which part of the states had grown and which ones</p> <p>3 had shrunk.</p> <p>4 He said, oh, yeah, we did that analysis and --</p> <p>5 and made some maps. And I said, if you could share them</p> <p>6 with me, so he did and I looked at them. We -- it</p> <p>7 wasn't related to really anything other than curiosity.</p> <p>8 Q. Got it. So if you go to PDF Page 13.</p> <p>9 A. Hang on one second, because it's not showing</p> <p>10 the page number. There it goes.</p> <p>11 Q. You'll know it's the right one if at the -- at</p> <p>12 the bottom right corner it says CMA_0015030.</p> <p>13 A. Yeah, got it.</p> <p>14 Q. Okay. So this has a title of 2019 Estimated</p> <p>15 Congressional District Variance.</p> <p>16 A. Yep.</p> <p>17 Q. Can you explain what that means?</p> <p>18 A. I don't know what it means.</p> <p>19 Q. Okay.</p> <p>20 A. As I said, my -- I didn't have a discussion</p> <p>21 with him. My -- the only part of this that I was</p> <p>22 interested in is which counties had grown and which ones</p> <p>23 had -- had shrunk and it was just a matter of curiosity,</p> <p>24 because I was just -- so which was the first -- the</p> <p>25 first map, the first page. And I was just curious as</p> <p style="text-align: right;">Page 91</p>	<p>1 change, you know, for different counties?</p> <p>2 A. Because in my head, I'm trying to figure out</p> <p>3 if any states are going to lose members of the --</p> <p>4 members of Congress and which ones are going to gain.</p> <p>5 Q. Members of Congress?</p> <p>6 A. Yeah.</p> <p>7 Q. To your knowledge, did Arkansas gain or lose</p> <p>8 any members of Congress in the -- the 2011 -- or sorry,</p> <p>9 the 2021 redistricting?</p> <p>10 A. Not to my knowledge, but again, I wasn't --</p> <p>11 there was a lot of conversations between what -- what</p> <p>12 things were happening and where things were going. And</p> <p>13 in general, the reason why I was curious is because I go</p> <p>14 to conferences, people come up and ask me questions and</p> <p>15 want to talk about things, and it's helpful to be</p> <p>16 knowledgeable about what's going on in different states,</p> <p>17 at least at a high level.</p> <p>18 Q. If you flip now ahead a few pages until you</p> <p>19 get to the page with the Bates Stamp ending in 032.</p> <p>20 A. Yep.</p> <p>21 Q. Says, "The maps on the following pages use the</p> <p>22 2019 US Census Bureau estimates by county to illustrate</p> <p>23 some theoretical plans that show potential changes to</p> <p>24 the composition of the districts." Can you explain your</p> <p>25 understanding of -- of this page?</p> <p style="text-align: right;">Page 93</p>

<p>1 A. I don't know that I have any specific -- this 2 is the first time I'm actually looking at these pages. 3 I don't know that I would have gone beyond sort of what 4 my interest was, but from -- from what it -- the title 5 says and what the text says, I'm guessing that he did 6 some sample plans where he tried to balance things out 7 at a high level. 8 Q. Okay. When you say "balance things out," you 9 mean? 10 A. Well, the -- my assumption is that the map on 11 -- on Page 12 is what the districts looked like prior to 12 last redistricting and it shows what the variance was 13 from ideal, and then he attempted to correct that 14 variance at a high level with the changes to make the -- 15 the variances less. 16 Q. And when you say "variances," you mean the 17 population within the congressional district being as 18 close to possible as the 754,451 target there where it 19 would be perfectly equal between the districts? 20 A. That's correct. 21 Q. The next five pages of the PDF, so the final 22 five pages are labeled Theoretical Congressional 23 Scenario and then appear to show different redistricting 24 drawings; is that right? 25 A. Correct.</p> <p style="text-align: right;">Page 94</p>	<p>1 Q. (By Mr. Pierce) Okay. So Exhibit 8 is a 2 document Bates stamped ending in 15311. It's a -- it's 3 a later in time email from the same email chain as 4 Exhibit 7. This time with Johnson emailing you what's 5 marked as 11:20 a.m.; is that right? 6 A. Yes. 7 Q. Do you recognize this email chain? 8 A. Again, not specifically, but yeah. 9 Q. What's your understanding of what Johnson is 10 asking you to do here? 11 A. I believe he was concerned that if I was going 12 to share these with anybody, I shouldn't share 15 13 through 20. 14 Q. And 15 through 20 correspond to the -- the 15 theoretical maps in Exhibit 7 that we were just 16 discussing? 17 A. Yes. 18 Q. Did he discuss with you why he didn't want you 19 to share the theoretical -- the theoretical maps? 20 A. I don't recall -- I don't recall whether he 21 did or he didn't, but that's not unusual, so I didn't -- 22 I wouldn't have questioned it. 23 Q. What's not unusual? 24 A. It's not unusual for me to get something that 25 somebody has -- is working on some data that's not</p> <p style="text-align: right;">Page 96</p>
<p>1 Q. Did you review these theoretical congressional 2 scenarios in the same way that you reviewed the -- you 3 know, the prior information about the population change 4 to sort of get a high level understanding of what might 5 happen? 6 A. No. 7 Q. Did you -- did you review -- did you review 8 these theoretical congressional scenarios? 9 A. I didn't. I wouldn't have any need to do that 10 and the -- there would never be a situation where I 11 would have to discuss this anybody, so I wouldn't have 12 had any interest in it at the time. 13 Q. Okay. 14 MR. PIERCE: Matthew, I think we can go to the 15 next -- the next exhibit. 16 MR. GOLDSTEIN: Okay. Great. This will be 17 Plaintiff's Exhibit 8. 18 (Deposition Exhibit No. 8 was marked for 19 identification and made part of the record.) 20 Q. (By Mr. Pierce) Let me know when you can see 21 it -- 22 A. I'm still not. 23 MR. GOLDSTEIN: It will be up -- it will be up 24 in a second. 25 A. There it is.</p> <p style="text-align: right;">Page 95</p>	<p>1 really -- it's just theoretical, playing and they don't 2 want it to be handed out as if it's official position of 3 the state or official -- official proposed maps, so it's 4 not unusual to get something like that and have a 5 request like that. 6 Q. And you don't remember -- let me rephrase. 7 You didn't have any conversations with Johnson 8 about any specific reason why he didn't want those 9 theoretical plans shared? 10 A. I don't remember that I would have asked. If 11 anything, I probably would have responded to him that I 12 had no plans of sharing it with anybody. I didn't have 13 anybody to share it with. 14 MR. PIERCE: I think, Matthew, we can pull up 15 the next -- the next exhibit. 16 MR. GOLDSTEIN: Okay. This will be 17 Plaintiff's Exhibit 9. 18 (Deposition Exhibit No. 9 was marked for 19 identification and made part of the record.) 20 MR. GOLDSTEIN: Will you let me know when you 21 can see it? 22 THE WITNESS: I can see it. 23 Q. (By Mr. Pierce) Okay. Plaintiff's Exhibit 9, 24 a document with a Bates stamp ending in 14085, a 25 February 24th, 2021, email from you to Shelby Johnson</p> <p style="text-align: right;">Page 97</p>

<p>1 with the subject EDGE Software Download; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. Do you recognize this document?</p> <p>4 A. Yes, again, generally, yes.</p> <p>5 Q. What are you sharing with -- with Shelby</p> <p>6 Johnson here?</p> <p>7 A. The download for the software, the -- the</p> <p>8 installation for the software and the link to our</p> <p>9 standard training documents.</p> <p>10 Q. So is this the -- got it. Okay. The -- the</p> <p>11 link to the training documents, is this a link to</p> <p>12 Citygate's website?</p> <p>13 A. Yes.</p> <p>14 Q. So are these publicly available training</p> <p>15 documents?</p> <p>16 A. Yes.</p> <p>17 Q. And the -- the link to the autoBound EDGE</p> <p>18 software, why does it say 2010 data?</p> <p>19 A. Because originally when we started to process</p> <p>20 this, so we had -- we have Amazon websites or Amazon</p> <p>21 sites for storing data and once the data started coming</p> <p>22 out, we initially just put it in the same place as the</p> <p>23 2010 store that we had on -- online and it started to</p> <p>24 become a little confusing so we moved it to 2020, but it</p> <p>25 was not the data. It was the software itself.</p> <p style="text-align: right;">Page 98</p>	<p>1 (Deposition Exhibit No. 10 was marked for</p> <p>2 identification and made part of the record.)</p> <p>3 MR. GOLDSTEIN: Sorry, Michael, which -- the</p> <p>4 Bates on this one is --</p> <p>5 MR. PIERCE: I think it's 14559.</p> <p>6 MR. GOLDSTEIN: Okay. We haven't seen 14557</p> <p>7 yet, so do you want to --</p> <p>8 MR. PIERCE: Oh, apologies. Let's pull that</p> <p>9 up first. Thank you, Matthew.</p> <p>10 MR. GOLDSTEIN: This will be Plaintiff's</p> <p>11 Exhibit 10.</p> <p>12 Q. (By Mr. Pierce) Mr. Hejazi, let me know when</p> <p>13 you can see it.</p> <p>14 A. Yep, I'm waiting for it. There it is.</p> <p>15 Q. Okay. So I misspoke. Plaintiff's Exhibit 9</p> <p>16 does not have a link to a PDF. Instead, I was referring</p> <p>17 to Plaintiff's Exhibit 10, which is an email from you to</p> <p>18 Shelby Johnson copying other folks on February 24th,</p> <p>19 2021. It has a Bates stamp ending in 14557; is that</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. The -- you -- you reference the</p> <p>23 technical training in this email. Could you describe</p> <p>24 that to us?</p> <p>25 A. I think we just went through the software</p> <p style="text-align: right;">Page 100</p>
<p>1 Q. Got it. So -- understood. I think we can --</p> <p>2 A. Also, this is -- if I -- yeah, so this is</p> <p>3 prior to the data being released. This is February of</p> <p>4 '21, so at that point, we're still using 2010 data.</p> <p>5 Q. Got it. This -- this is before the earlier</p> <p>6 exhibit we looked at in August 2021 when the 2020 census</p> <p>7 data was released and ready to be uploaded into the</p> <p>8 AutoBound software?</p> <p>9 A. Correct. Normally this wouldn't have</p> <p>10 happened, because the data would have been out by --</p> <p>11 at -- at this point, the data -- we would be looking at</p> <p>12 the data being released from the Census Bureau. There</p> <p>13 would have been not a need for us to be playing around</p> <p>14 with 2010 data, so that's why this is -- this -- this</p> <p>15 year was -- this last cycle was unusual because of</p> <p>16 COVID.</p> <p>17 Q. And exhibit --</p> <p>18 MR. PIERCE: Sorry, Matthew, what exhibit is</p> <p>19 this?</p> <p>20 MR. GOLDSTEIN: This is Exhibit 9.</p> <p>21 Q. (By Mr. Pierce) Exhibit 9, apologies. So</p> <p>22 Exhibit 9, you see the -- listed in the attachment</p> <p>23 field, it says, EDGE Technical Presentation. We're now</p> <p>24 going to bring up our next exhibit, which will be</p> <p>25 Exhibit 10, which will be that attached PDF.</p> <p style="text-align: right;">Page 99</p>	<p>1 start to finish how to use all the different features.</p> <p>2 Q. Below the email, Shelby asks you -- or Shelby</p> <p>3 states that, "Thomas was able to finalize the incumbents</p> <p>4 location data for the House & Senate." How did you</p> <p>5 understand that?</p> <p>6 A. You can load the locations of incumbents in</p> <p>7 the software.</p> <p>8 Q. And that just means the -- the -- like, the</p> <p>9 physical address of the incumbent politician and not,</p> <p>10 like, voting data for the incumbent?</p> <p>11 A. No, no, no. It just means the physical</p> <p>12 location of the incumbent. Like, you typically don't</p> <p>13 want in your presentations -- in the -- in Arkansas -- I</p> <p>14 can't speak to how Arkansas uses it. They may have</p> <p>15 rules that keeps incumbents in their districts. They</p> <p>16 may have just a need to display the information. I</p> <p>17 don't know.</p> <p>18 I -- I only can tell you that in this</p> <p>19 particular case what incumbents refer to is a point</p> <p>20 location for the incumbent. It may be their home. It</p> <p>21 may be their office or some other location that they</p> <p>22 choose to display and -- and I believe this email states</p> <p>23 that Thomas was able to create a point file for House</p> <p>24 and Senate and -- and Shelby was asking me if this was</p> <p>25 as easy as displaying an overlay for point files.</p> <p style="text-align: right;">Page 101</p>

<p>1 Q. Okay. So we'll -- we'll next pull up Exhibit 2 11, which is the PDF that's referenced in -- in Exhibit 3 10, the EDGE Technical Presentation. 4 (Deposition Exhibit No. 11 was marked for 5 identification and made part of the record.) 6 Q. (By Mr. Pierce) Let me know when you can see 7 it. 8 A. Yeah, it's taking awhile to load. I don't 9 think this is the link for that, but I could be 10 mistaken. This is -- yeah, this is just the general 11 training. 12 Q. Yeah, so apologies. If you go -- so Exhibit 13 10 had -- I think had two things. One, is Exhibit 10 14 had a link to the Citygate website to a specific 15 training document called Adding Incumbents Layer -- 16 A. Correct. 17 Q. -- but then it also attached the EDGE 18 Technical Presentation.pdf and I believe Exhibit 11 is 19 the attached EDGE Technical presentation.pdf. It should 20 be -- it should be titled autoBound EDGE redistricting 21 -- autoBound EDGE Redistricting System, Technical 22 Training, Citygate GIS, with a Bates that ends in 14559. 23 A. Okay. This one says 14564. 24 Q. 14564. Okay. One second. 25 A. Oh, these are all the different pages of it.</p> <p style="text-align: right;">Page 102</p>	<p>1 Arkansas technical users who were working on the 2021 2 redistricting? 3 A. Okay. That's -- let me -- let me give you the 4 -- kind of the clear -- clear explanation. So we did -- 5 for most clients, we did an end user training that would 6 be for the people that are drawing the -- the maps and 7 then we did technical training for people that are -- 8 the IT staff that's supporting them. 9 This was for the IT staff that's supporting 10 that, so it dealt with more technical aspects of the 11 software, such as storage and formats and creating data 12 and things like that, as opposed to the use of the 13 software, which would have been in the end user 14 training. 15 Q. Understood. So if we go to page -- so Page 6 16 of the PDF, which if you're going by the Bates numbers 17 on the bottom right-hand corner will end in 564. 18 A. 161 -- 19 Q. 5 -- 20 A. -- 4? 21 Q. Yeah, 14 -- 22 A. Okay. 23 Q. -- 564, so it's titled EDGE -- EDGE Desktop 24 Redistricting -- Redistricting Reports. 25 A. Yes.</p> <p style="text-align: right;">Page 104</p>
<p>1 They're different numbered. 2 Q. Oh. Got it. Okay. If you -- if you scroll 3 back to the first page of the PDF -- 4 A. Yes, 14559. 5 Q. Okay. Got it. So just -- sorry, just so 6 the -- the transcript is clear, so Exhibit 11 is a PDF 7 with a Bates number 14559. It's titled autoBound EDGE 8 Redistricting System, Technical Training, Citygate GIS; 9 is that right? 10 A. Yes. 11 Q. And do you recognize this document? 12 A. Yes. 13 Q. Okay. What is this document? 14 A. It's what we use for doing technical training. 15 Q. Okay. And did -- is this the technical 16 training that would have applied to the Arkansas use of 17 AutoBound in connection with the 2021 redistricting? 18 A. This would have been for the technical folks. 19 Q. This would have been for the technical folks 20 and it would have applied to the technical folks working 21 on the Arkansas 2021 redistricting among other -- I know 22 it was -- let me start again. 23 I know this was also used for other states, 24 but I just wanted to confirm that this is the -- the 25 technical training that would have been available to the</p> <p style="text-align: right;">Page 103</p>	<p>1 Q. So if we -- I don't know if you can -- can you 2 Zoom in your Exhibit Share? 3 A. I can't, but -- 4 Q. Can you -- can you see there are -- it looks 5 like six different screenshots on this -- on this page 6 of the PDF? Can you -- can you see them? 7 A. Yes. 8 Q. The -- what are these? 9 A. It's -- this -- so the way these training 10 PowerPoints were done is you would bring the -- the page 11 up and then we would have a discussion about -- about 12 that particular topic and I would be referring to 13 different parts of this screen. This is talking about 14 how to customize reports. 15 Q. Got it. And -- and is the -- the list of 16 reports in the upper left screenshot, the list that 17 starts with the language and then -- and then goes down, 18 are those the list of, like, default reports that are 19 available to all users? 20 A. Not necessarily. These were ones that -- this 21 is -- I made these screenshots so they were from my 22 system. 23 Q. Got it. So is -- does AutoBound have a set 24 of, like, you know, basic or default reports that -- 25 A. Yes, there are a set of default reports.</p> <p style="text-align: right;">Page 105</p>

<p>1 Q. Got it. But this screenshot doesn't 2 necessarily show them, it shows whatever happened to be 3 stored on your -- on your AutoBound? 4 A. Correct. The point of this screen was to talk 5 about how to customize reports, not necessarily about 6 what's there as a default report. 7 Q. Got it. Do you -- I mean, as you sit here 8 today looking at them, do you know if any of them are 9 default reports? 10 A. On here? On this -- in this list that's on 11 the -- on the first -- 12 Q. I guess I could ask it more specifically. The 13 -- the reports titled Racial Demographics, African 14 American Majority Minority, African American Majority 15 Minority Summary, Voting Age Demographics, are these 16 reports among the sort of -- 17 A. They're there, yes. They are among the 18 standard ones, yes. 19 Q. Got it. Okay. So and how -- if you go to the 20 bottom left image on this page, it looks like it's a 21 screenshot that shows the reports and then there's a 22 button that says Display Report; is that right? 23 A. Yep. 24 Q. So would a user of autoBound EDGE just need to 25 select a report and then click "display report" and then</p> <p style="text-align: right;">Page 106</p>	<p>1 MR. BRASCHER: I'm going to object to the 2 form. That's all. 3 Q. (By Mr. Pierce) Sorry. Yeah, Mr. Hejazi, I 4 can -- I can try that again. The -- the autoBound EDGE 5 software I understand you're saying users could -- you 6 know, could customize reports, but as a starting place, 7 AutoBound users would have reports available to them 8 that would show racial demographics? 9 A. Without -- without making modifications, they 10 would have -- they would have gotten the -- the report 11 that came with the system. If they made no 12 modifications to it, then it would show black alone 13 population. I -- again, as I recall, there's many parts 14 to the software and I haven't used it in two years 15 because -- because redistricting is a time dependent 16 activity, so I can't necessarily remember the details 17 accurately. It may have shown more information than 18 that, but that's what I recall. 19 Q. And all a user would need to do to run these 20 reports is click the report and then click "display 21 report"? 22 A. Yes. 23 Q. Okay. If we go to the bottom right -- 24 actually -- yeah, so the bottom right here, the bottom 25 right screenshot on this page, it says autoBound EDGE</p> <p style="text-align: right;">Page 108</p>
<p>1 they would get, you know, whatever information was in 2 the report? 3 A. Yes. 4 Q. So is it right that if in the -- in the 5 starting -- in the starting settings for the AutoBound 6 software that were licensed to Arkansas, an Arkansas end 7 user would have as an option among these reports to run, 8 reports that would show racial demographics, including 9 black voter demographics? 10 A. Yes, but again, I believe if I recall 11 correctly, the black voters were defined as individuals 12 having selected only black as their racial category. 13 These reports were also starting points. That's why the 14 -- this screen was here to allow them to customize these 15 to show how it could be customized. 16 Q. So the -- the technical support folks and/or 17 the users could customize the reports, but the -- sort 18 of the starting -- you know, at the very least as a 19 starting point, they had reports that included racial 20 demographic statistics that were, you know -- and for 21 the black racial demographic statistics, they were based 22 on the black alone census data? 23 A. As I recall -- 24 MR. BRASCHER: Objection -- 25 A. -- again, without going into it --</p> <p style="text-align: right;">Page 107</p>	<p>1 Report Viewer. Can you describe what that's showing? 2 A. Just shows what the -- what the report -- 3 example of a report that came out of the system. 4 Q. Got it. So the -- the reports themselves are 5 fairly -- you know, they're visual. It's not like a 6 spreadsheet of information. It's some sort of visual 7 depiction for the user? 8 A. Some of them are and some of them are more 9 just tabular. They vary. This is one of the more 10 visual ones as an example. 11 Q. Okay. Let's go to Page 9, which it ends in 12 14567. 13 A. Yes. 14 Q. Okay. What -- what are these two screenshots? 15 A. This is showing how to load an incumbents. 16 Q. And is the screenshot on the right, is that 17 showing what a user sees in autoBound EDGE? 18 A. No, they're just two different ways of loading 19 incumbents. You can manually type it in using the 20 screen on the right or you can put them in an axis table 21 like is shown on the left. And it's just showing that 22 if you type it into the axis, it will show up in the 23 software and if you want to manually update it, you can 24 update it through the software using the screen on the 25 right.</p> <p style="text-align: right;">Page 109</p>

<p>1 Q. I understand that's the -- that's the main 2 purpose of this screenshot. I'm wondering about the -- 3 the bottom portion of the screenshot on the right, which 4 shows total population tabulation, racial demographics 5 as a percent of total population. That display at the 6 bottom, is that the starting point for what a user of 7 AutoBound would see in terms of demographic information?</p> <p>8 A. That's the spreadsheet we looked at earlier.</p> <p>9 Q. Yeah, got it. And so if an AutoBound user 10 using the -- you know, the -- the pre-loaded settings, 11 this -- the bottom of this screenshot shows the -- the 12 demographic information they would see when they're -- 13 when they're drawing the map?</p> <p>14 A. Yes.</p> <p>15 Q. Got it. Okay. Let's just one more -- one 16 more question here on this document. If you go to PDF 17 Page 12, which ends in 14570, it looks like there's -- 18 there's two screenshots again, and on the screenshot on 19 the left, it looks like there are some views called 20 Governor's Race, for example, Congressional Race. 21 Can you explain what those mean?</p> <p>22 A. Yes, you can -- I gotta Zoom in here a little 23 bit so I can see. You can create demographic views, so 24 you know, color -- color data by a specific -- by a 25 specific racial category or demographic category or --</p> <p style="text-align: right;">Page 110</p>	<p>1 created those views for Pennsylvania and then I change 2 my system to look at Arkansas. Those saved views stay. 3 If I go to apply it to Arkansas, it's going to say data 4 is not there to support that analysis, so it's just an 5 analysis that's been stored.</p> <p>6 Q. Got it.</p> <p>7 MR. PIERCE: Okay. I think we can go off the 8 record now.</p> <p>9 THE VIDEOGRAPHER: We are off the record --</p> <p>10 THE WITNESS: Just for the purposes of 11 planning my day --</p> <p>12 THE VIDEOGRAPHER: Hang on a minute. We are 13 off the record at 12:10 p.m.</p> <p>14 (A recess was taken from 12:10 p.m. to 15 12:47 p.m.)</p> <p>16 THE VIDEOGRAPHER: We are back on the record 17 at 1247 p.m.</p> <p>18 MR. PIERCE: Thanks, everybody.</p> <p>19 Q. (By Mr. Pierce) So we have loaded into the 20 exhibit share a -- a training video that corresponds to 21 Bates Stamp ending in 14669. It was produced natively 22 so it -- it doesn't have -- it doesn't have a Bates 23 stamp. It's a -- it's a video, the -- the first screen 24 of which has the title autoBound EDGE Redistricting 25 System End User Training.</p> <p style="text-align: right;">Page 112</p>
<p>1 or election result category and pre-save them so that 2 you can switch back and forth into different -- into 3 different views of the data.</p> <p>4 Q. And this screenshot is showing that in this -- 5 you know, the system that you were screen sharing from, 6 there was voting data loaded for it looks like 7 Governor's Race and Congressional Race?</p> <p>8 A. So the -- the views are created and stored 9 based on whatever data set you happen to have loaded 10 when you created it. It doesn't tie to the data that 11 you current -- you are currently displaying. Does that 12 make sense?</p> <p>13 Q. Meaning when you created these views, for 14 example, you create -- if you created the congressional 15 race 2002 view back in -- at some point in the past when 16 you loaded the congressional race 20 -- 2002 data, but 17 now in 2021, you no longer have that data loaded, it 18 would still show up as a saved view?</p> <p>19 A. Yes.</p> <p>20 Q. Got it. Okay.</p> <p>21 A. It's -- it's just a -- the -- the software has 22 no concept of what data set you're -- you are -- you 23 currently have displayed. It only has a concept of what 24 information has been stored and if -- if I am -- because 25 I am working with multiple different states, I may have</p> <p style="text-align: right;">Page 111</p>	<p>1 Mr. Hejazi, are you able to -- to access that 2 video?</p> <p>3 A. Yes.</p> <p>4 Q. And is the -- the title of the video -- and I 5 think we're on -- I think this is Exhibit 11 --</p> <p>6 MR. PIERCE: Is it Exhibit 12?</p> <p>7 MR. GOLDSTEIN: It's Exhibit 12.</p> <p>8 Q. (By Mr. Pierce) Exhibit 12. Okay. 9 Apologies. So for the record, Exhibit 12 is a -- is a 10 training video that corresponds to the document that 11 ends in Bates number 17411. It doesn't have a Bates 12 number because it's a video produced natively. The 13 first screen of the video says autoBound EDGE 14 Redistricting System End User Training.</p> <p>15 (Deposition Exhibit No. 12 was marked for 16 identification and made part of the record.)</p> <p>17 Q. (By Mr. Pierce) Is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recognize this video?</p> <p>20 A. I believe it was just a recording of one of 21 the training sessions.</p> <p>22 Q. Great. If you go to -- there should be a 23 slider that let's you select which portion of the video 24 to play. If you're able to play starting at 2 minutes 25 and 39 seconds.</p> <p style="text-align: right;">Page 113</p>

<p>1 A. I don't think so, because this video only goes 2 to -- oh, wait. Maybe I'm incorrect. Two minutes and 3 what was that? 4 Q. Thirty-nine seconds. 5 A. All right. Yeah. 6 Q. Okay. Are you able to play it? 7 A. Yep. 8 Q. Can you hear it? 9 A. I have muted it. 10 Q. Let's maybe -- if you -- if you can unmute it 11 and start it at 2 minutes and 39 seconds. 12 A. Sure. 13 (Video playing.) 14 Q. (By Mr. Pierce) And can you hear it 15 Mr. Hejazi? 16 A. Yeah. 17 Q. Okay. We'll maybe pause it right there. 18 A. Okay. 19 Q. Can you describe for us what you were saying 20 in that video? 21 A. I believe I was saying that this is a -- this 22 was a shorter version of the training -- 23 Q. And this -- 24 A. -- for overview. 25 Q. And is this a training that you gave to folks</p> <p style="text-align: right;">Page 114</p>	<p>1 to 4 minutes and 12 seconds? 2 A. Yeah, but I was also speaking to you, so I may 3 have -- there might be something where I said somebody's 4 name that would help clarify who this -- who this was 5 for that I missed. 6 Q. Got it. So I think we'll -- we'll make it a 7 little easier here with this exhibit that I think 8 Matthew just uploaded to the -- to the Exhibit Share. 9 MR. GOLDSTEIN: This will be Exhibit 13. 10 (Deposition Exhibit No. 13 was marked for 11 identification and made part of the record.) 12 A. All right. Okay. 13 Q. (By Mr. Pierce) Exhibit 13 should be a 14 document with the Bates Stamp ending in 14669. It's a 15 March 30th, 2021, to you from Lori Bowen and Shelby 16 Johnson with the subject re -- Redistricting Update; is 17 that right? 18 A. Yeah. 19 Q. Do you recognize this email? 20 A. Generally, yeah. 21 Q. So it looks like Shelby Johnson asks Lori 22 Bowen about Citygate training earlier this year via GoTo 23 Meeting. Is that a training that you gave? 24 A. It's possible. I don't -- I don't remember, I 25 mean. It's possible.</p> <p style="text-align: right;">Page 116</p>
<p>1 working on the Arkansas congressional redistricting? 2 A. I don't recall who it was given to. 3 Q. Okay. Let's maybe keep -- keep playing the 4 video, apologies, for -- for one more minute and then 5 I'll reask you the questions. 6 (Video playing.) 7 Q. (By Mr. Pierce) So, Mr. Hejazi, if we could 8 -- if we could pause it there. 9 A. Yes, so far -- 10 Q. So -- 11 A. -- I haven't seen anything that specifically 12 tells me this was done for Arkansas. It may have been 13 done. I'm not saying that it wasn't. 14 Q. Yeah, so we'll go ahead -- I wanted to make 15 sure the video was loaded in case it -- in case it took 16 some time, but we're going to go on head and introduce a 17 couple of documents that should help clarify that. 18 MR. PIERCE: So, Matthew, can you please put 19 in the next exhibit? 20 MR. BRASCHER: And can we -- can we clarify 21 where Mr. Hejazi is at in the video right now? 22 Q. (By Mr. Pierce) Yeah, where did you pause, 23 Mr. Hejazi? 24 A. Four minutes and 12 seconds. 25 Q. So you played it from 2 minutes and 39 seconds</p> <p style="text-align: right;">Page 115</p>	<p>1 Q. To your knowledge, did any other Citygate 2 employee give trainings to Arkansas about the 2020 -- in 3 connection with the 2021 congressional redistricting? 4 A. Okay. Let me read this again. No, I -- I 5 would have been the one that did -- that did it. I'm 6 just not sure what video we were looking at was that 7 training. 8 Q. Got it. We'll -- we'll try and -- we'll try 9 and piece that together. 10 A. Okay. 11 Q. But just -- if you're looking at just this 12 email, the training that they're referring to in this 13 email is a training that you gave to the Arkansas folks 14 working on the redistricting? 15 A. I did give a training and I believe it was 16 recorded. 17 Q. And the -- the link you provide in this 18 exhibit is to Citygate's website slash 19 docs/EDGETraining/Recordings/EDGEDesktop.MP4? 20 A. Yes, but again, I'm not sure. It could well 21 be that this was just another recording that I did of 22 the same training that I give somebody else, so I don't 23 know for a fact that -- it doesn't have any -- any 24 markings on it that specifically identifies it as -- as 25 Arkansas's training. So it's very possible that I just</p> <p style="text-align: right;">Page 117</p>

<p>1 found a training that I did and I just referred them to 2 the training -- the online training that I had recorded. 3 I don't know that this is specifically -- this 4 was a specific one that was done for Arkansas or it was 5 just one that I found and I said this -- I think this is 6 what you're looking for. 7 Q. Got it. So in Lori Bowen's March 24th email 8 lowering the chain, when -- when Lori says, "Did I 9 understand correctly that the Citygate training they did 10 earlier this year on GoToMeeting was recorded?" You're 11 not sure if that's referring to a training for Arkansas 12 or a training for some other state that then you just 13 showed to Arkansas? 14 A. No, no, no. No, the training was recorded, 15 but it wouldn't have necessarily made it to -- it would 16 have been recorded and at the time, I may have forwarded 17 it to -- to Arkansas. They would have requested it and 18 I would have sent it to them, but when -- if it was 19 recorded. 20 Again, this is -- this is talking about 21 something that happened earlier, which I did not have a 22 recollection of, so then I -- all I -- all I did was I 23 went through all our training recordings and tried to 24 find something that had that. It may have been the one 25 that was done for Arkansas. It may have been done for</p> <p style="text-align: right;">Page 118</p>	<p>1 that was more comprehensive or there were not as many 2 interruptions or as there were not any issues with it, I 3 would have replaced the one that I had done with a newer 4 one. They were all basically the same training. There 5 was nothing specific about Arkansas. So that's why I'm 6 not sure if this one just given the time it was a newer 7 one or if it was one that I had done for Arkansas. I -- 8 I can't recall that. 9 Q. Got it. Okay. So I think we'll do -- we'll 10 do two things now. The first step will be looking at 11 that link you provided. My colleague, Matthew, is going 12 to upload our next exhibit, which let me know when you 13 can see it. 14 MR. GOLDSTEIN: This will be Exhibit 14. 15 (Deposition Exhibit No. 14 was marked for 16 identification and made part of the record.) 17 Q. (By Mr. Pierce) Let me know when you can see 18 that, Mr. Hejazi. 19 A. Okay. I see it. 20 Q. Okay. Exhibit 14 is a document with a Bates 21 stamp ending in 17409. It is a -- the top of it 22 under -- under document title is the same -- excuse me, 23 URL address as in Exhibit 13; is that right, Mr. Hejazi? 24 A. Yes. 25 Q. I'll represent to you that Page Vault is a</p> <p style="text-align: right;">Page 120</p>
<p>1 somebody else that I -- that I forwarded to them, but 2 the training formats were similar to each other, so 3 that's why it wouldn't have made any difference whether 4 this was for Arkansas or was for Washington. 5 Q. And in the top line email when you say, "I 6 think this is the link you are looking for," and then 7 you provide that link, what you're -- what you're saying 8 now is you're not sure if this link is to Arkansas 9 training or to some other training you did that also 10 covered, you know, how to use AutoBound? 11 A. Correct -- 12 MR. BRASCHER: So just object to the form. 13 Q. (By Mr. Pierce) Sorry, Mr. Hejazi. I -- I 14 can try that again. This link that you provided at the 15 top of -- 16 MR. PIERCE: Sorry, what exhibit number are we 17 on again? 18 A. 13. 19 Q. (By Mr. Pierce) 13. The -- the link you 20 provided at the top of Exhibit 13, you're saying you're 21 not sure if that's the Arkansas training or if it's the 22 training of some other state? 23 A. Yes, so what would have happened during this 24 time is I would have done a training session and I would 25 have recorded it and if I did a later training session</p> <p style="text-align: right;">Page 119</p>	<p>1 service that captures screenshots or downloads materials 2 from the internet. Do you recognize the -- the URL 3 listed under the capture URL? Is that Citygate's 4 website? 5 A. Yes. 6 Q. Okay. And if you scroll to the second page of 7 Exhibit 14, do you recognize this screenshot? 8 A. Yes. 9 Q. So it has 2 hours, 2 minutes and 14 seconds as 10 the length of the video, which I believe is the same 11 length of the video in Exhibit 12; is that right? 12 A. Yes. 13 Q. Okay. So I think now with that context, if we 14 can go -- 15 MR. BRASCHER: One -- one thing. I don't -- 16 the Exhibit 12 I have is an hour, 29 and 57. 17 MR. PIERCE: Oh, is it? Maybe we'll -- let's 18 go off line for a second and make sure we're talking 19 about the same video. 20 THE WITNESS: And it's -- it's correct. 21 THE VIDEOGRAPHER: We -- do we still need to 22 go off? 23 MR. PIERCE: Well, Mr. Hejazi, are you -- how 24 long is the video that you are seeing? 25 THE WITNESS: One hour and 30 minutes.</p> <p style="text-align: right;">Page 121</p>

<p>1 MR. PIERCE: Yeah, if we could go take a --</p> <p>2 just a two-minute recess and go off the record briefly.</p> <p>3 THE VIDEOGRAPHER: We are off the record at</p> <p>4 1:02 p.m.</p> <p>5 (A recess was taken from 1:02 p.m. to</p> <p>6 1:17 p.m.)</p> <p>7 THE VIDEOGRAPHER: We are back on the record</p> <p>8 at 1:17 p.m.</p> <p>9 MR. PIERCE: Thank you, everybody. So I'm</p> <p>10 going to recap.</p> <p>11 Q. (By Mr. Pierce) My understanding and if,</p> <p>12 Mr. Hejazi, you could just confirm that it's the same as</p> <p>13 your understanding. Exhibit 12, the email -- the March</p> <p>14 30th email from you to Lori Bowen and Shelby Johnson was</p> <p>15 a link to Citygate's website that is a link to an MP4</p> <p>16 file. Tab 13 is the -- the Page Vault screenshot of</p> <p>17 that MP4 -- of that MP4 file, the second page of which</p> <p>18 shows a video with 2 hours 2 minutes and 14 seconds; is</p> <p>19 that right?</p> <p>20 A. Yes.</p> <p>21 MR. GOLDSTEIN: Michael, Exhibit 13 is the</p> <p>22 email. Exhibit 14 is the screenshot. Exhibit 12 is the</p> <p>23 video.</p> <p>24 MR. PIERCE: Got it. Sorry about that.</p> <p>25 Q. (By Mr. Pierce) With what Matthew said --</p> <p style="text-align: right;">Page 122</p>	<p>1 could go into the video and -- and start it at 2 minutes</p> <p>2 and 39 seconds and then tell us when you hit play and</p> <p>3 then I will tell you after about a minute or two to</p> <p>4 pause it and then I'll ask you questions about -- about</p> <p>5 it.</p> <p>6 (Video playing.)</p> <p>7 Q. (By Mr. Pierce) Okay. So I think we can</p> <p>8 pause it -- pause it there, Mr. Hejazi.</p> <p>9 A. Okay.</p> <p>10 Q. And what mark did you make it to?</p> <p>11 A. Four minutes.</p> <p>12 Q. Four minutes, great. Did that video --</p> <p>13 watching that portion of the video refresh your</p> <p>14 recollection in terms of who the audience was for this</p> <p>15 training?</p> <p>16 A. No.</p> <p>17 Q. I think you mentioned in that portion of the</p> <p>18 video that you had worked with you guys before and 2010</p> <p>19 and -- and previously?</p> <p>20 A. Yes.</p> <p>21 Q. But is it that that could describe multiple</p> <p>22 states, so you're not sure which state it is?</p> <p>23 A. That in -- that -- that applies to almost all</p> <p>24 of your clients.</p> <p>25 Q. Got it. Okay. Let's go forward to 12 minutes</p> <p style="text-align: right;">Page 124</p>
<p>1 yeah, okay. With that correction then. And before we</p> <p>2 went off the record, there was some confusion because</p> <p>3 the second page of the screenshot, which ends in -- of</p> <p>4 the Page Vault screenshot, which ends in Bates number</p> <p>5 17410 shows a video length of 2 hours, 2 minutes, 14</p> <p>6 seconds, but the video we have loaded to the exhibit</p> <p>7 share showed a shorter video, an hour and a half.</p> <p>8 We've determined that that's because of the</p> <p>9 technical limitations in the Exhibit Share that limit</p> <p>10 videos to 90 minutes. We've developed a work around, so</p> <p>11 are ready to proceed.</p> <p>12 MR. BRASCHER: That's -- that's all correct</p> <p>13 with me. My one question is, I have now received the</p> <p>14 email you sent me with the full length video. In order</p> <p>15 to sign in, it's asking me for an O'Melveny sign-in</p> <p>16 username.</p> <p>17 MR. PIERCE: Got it. So, Matthew, you can</p> <p>18 link up Justin with the IT folks on our side and get him</p> <p>19 an account set up so he can download that.</p> <p>20 MR. GOLDSTEIN: Of course. Yeah, will do.</p> <p>21 MR. BRASCHER: Sounds good. Thank you very</p> <p>22 much.</p> <p>23 MR. PIERCE: Okay. Thanks again, everybody</p> <p>24 for your flexibility.</p> <p>25 Q. (By Mr. Pierce) Okay. Mr. Hejazi, so if you</p> <p style="text-align: right;">Page 123</p>	<p>1 and 41 seconds and tell me when you have that up.</p> <p>2 A. Twelve minutes and 41 seconds?</p> <p>3 Q. Yep.</p> <p>4 A. Okay.</p> <p>5 Q. Okay. And then please play it and I'll tell</p> <p>6 you when to stop.</p> <p>7 (Video playing.)</p> <p>8 Q. (By Mr. Pierce) All right. You can pause it.</p> <p>9 So did the video just display how an autoBound EDGE user</p> <p>10 could view data at either the county, the precinct, or</p> <p>11 the block level?</p> <p>12 A. Yes.</p> <p>13 Q. And could they view at the county, precinct,</p> <p>14 or block level -- sorry, let me -- let me re -- let me</p> <p>15 restart.</p> <p>16 The information that they could view at the</p> <p>17 county precinct or block level, would that include</p> <p>18 racial demographic information?</p> <p>19 A. Whatever was provided by the Census Bureau,</p> <p>20 which is the racial -- the racial breakdowns that the</p> <p>21 Census Bureau provides.</p> <p>22 Q. Great. Can we fast forward to 13 minutes, 22</p> <p>23 seconds? Let me know when you're there.</p> <p>24 A. Yep.</p> <p>25 Q. All right. You can play.</p> <p style="text-align: right;">Page 125</p>

<p>1 (Video playing.)</p> <p>2 Q. (By Mr. Pierce) And we can pause there.</p> <p>3 A. Okay.</p> <p>4 Q. And where did you make it to in the video?</p> <p>5 A. It's 13:46.</p> <p>6 Q. Was that portion of the video showing</p> <p>7 AutoBound users how to view particular -- I don't know</p> <p>8 what you call those. Are those reports?</p> <p>9 A. They're views.</p> <p>10 Q. Views. Got it. So AutoBound users could --</p> <p>11 could choose among different views each of which</p> <p>12 displays different information?</p> <p>13 A. That's correct.</p> <p>14 Q. And some of those views include racial</p> <p>15 demographic information?</p> <p>16 A. I think there is a little bit of confusion</p> <p>17 there, which I will attempt to clarify. You can create</p> <p>18 views in labeling options depending on whatever data set</p> <p>19 you're using. So for example -- sorry. When I look at</p> <p>20 this particular example, there's a labeling option that</p> <p>21 says Secretary of State 2002 or Presidential 2008.</p> <p>22 That doesn't mean that these labeling options</p> <p>23 apply to this particular data set. They just mean that</p> <p>24 at some point the user that was using this data set had</p> <p>25 loaded a particular data set that included this data and</p> <p style="text-align: right;">Page 126</p>	<p>1 this is the data set that I'm using. It has nothing to</p> <p>2 do with political stuff, but if I click the same button,</p> <p>3 you can see in this list I have Hispanic population. I</p> <p>4 have Illinois Governor's Democratic for '18. It's</p> <p>5 completely unrelated to this particular data set.</p> <p>6 Q. Got it.</p> <p>7 A. So if I click this, nothing happens because</p> <p>8 the data is not there to support it.</p> <p>9 Q. So you're using this to show that just because</p> <p>10 a -- just because a thematic view is available doesn't</p> <p>11 mean that a user could actually apply it to their</p> <p>12 particular draft --</p> <p>13 A. Correct. Correct. There's -- showing the</p> <p>14 list here saying that these are -- these are the things</p> <p>15 that are available is not relevant to the data set</p> <p>16 you're using. It could have been -- these are user</p> <p>17 created views. So I could have been doing some work for</p> <p>18 Illinois and created this particular set and it has</p> <p>19 nothing to do with other data sets that I do. It only</p> <p>20 applies to the -- to the Illinois data set when I have</p> <p>21 that data set loaded.</p> <p>22 Q. So, like, Black Pop as Percent of Total or</p> <p>23 Black Threshold 30% if you see there near the top --</p> <p>24 MR. PIERCE: And, Matthew, if you want to grab</p> <p>25 a screenshot of this.</p> <p style="text-align: right;">Page 128</p>
<p>1 they created these labeling options. So it's not tied</p> <p>2 to the data so much as it is tied to the installation of</p> <p>3 the software.</p> <p>4 Q. Got it. So what you're saying is that the --</p> <p>5 a user would have to -- a user could create views based</p> <p>6 on whatever data the user has at that point in time?</p> <p>7 A. Yes, so for example, if you would like, I can</p> <p>8 share my screen with you and show you what actually</p> <p>9 we're talking about, if that helps you. I'm not --</p> <p>10 Q. Sure.</p> <p>11 A. -- trying -- trying to create more confusion</p> <p>12 here. All right. This is a screen -- this is a view of</p> <p>13 a screen of the software.</p> <p>14 Q. Got it. And if we could pause right here for</p> <p>15 a second.</p> <p>16 MR. PIERCE: And, Matthew, if you can grab a</p> <p>17 -- a screenshot of this and we'll throw it up as an</p> <p>18 exhibit.</p> <p>19 Q. (By Mr. Pierce) And, Mr. Hejazi, could you</p> <p>20 explain again what this is?</p> <p>21 A. This is a redistricting plan for high schools</p> <p>22 and middle schools in City of Lexington, Kentucky.</p> <p>23 Q. Got it. Okay. So you're using this to show</p> <p>24 us how to -- how to create different views?</p> <p>25 A. Well, what I'm -- what I'm showing is that</p> <p style="text-align: right;">Page 127</p>	<p>1 Q. (By Mr. Pierce) -- these -- these thematic</p> <p>2 views are views that Citygate -- Citygate created at</p> <p>3 some point for some reason, they -- you know, they were</p> <p>4 used for some purpose, but you're using this example to</p> <p>5 show you couldn't use them for all draft maps?</p> <p>6 A. Correct. It's -- this is not an indication of</p> <p>7 the data sets available. So this is not -- look --</p> <p>8 looking at this and seeing that in here that said State</p> <p>9 Auditor 2022 doesn't mean there's state auditor</p> <p>10 information. It just means that at some point, I</p> <p>11 created a thematic view for State Auditor 2022 and I</p> <p>12 saved it, and so this is just -- shows a list of things</p> <p>13 that I've saved.</p> <p>14 Q. And when -- when you give -- or when you</p> <p>15 licensed autoBound EDGE, for example, when you -- when</p> <p>16 you licensed it -- let me make it more specific.</p> <p>17 When you licensed autoBound EDGE to Arkansas</p> <p>18 to use in their 2021 congressional redistricting, were</p> <p>19 these thematic views, like, pre-loaded in their</p> <p>20 software?</p> <p>21 A. No, it wouldn't be. This is just -- this</p> <p>22 was -- this was for the -- this was in -- when I was</p> <p>23 doing the training, assuming that this training session</p> <p>24 was the one that was presented to Arkansas. I can't --</p> <p>25 I can't validate that. They would have just seen what's</p> <p style="text-align: right;">Page 129</p>

<p>1 on my screen. This is -- when the software ships, 2 normally there should be nothing here. If it is 3 something here, it was just -- may have been included by 4 accident, but it's not supposed to be, because -- 5 Q. Right. 6 A. -- it's not -- it's not -- it isn't part of -- 7 this is just saved templates. That's all this is. 8 Q. Let me make sure I'm understanding, which is 9 that for -- for certain features of autoBound EDGE, 10 there are -- let me start again. 11 Certain autoBound EDGE features have starting 12 points or presets where they show certain information. 13 It sounds like the thematic views is different where 14 Arkansas would have received it, like, blank and it -- 15 is that right? 16 A. Yes. There wouldn't -- there wouldn't be any 17 thematic views because those are very user dependent -- 18 Q. Okay. 19 A. -- and it's not -- you don't need it to use 20 the software. It's just something there for 21 convenience. 22 Q. Got it. Okay. Great. I think if we end this 23 screen share, which was very helpful, my colleague is 24 going to introduce the two screenshots -- 25 A. That's fine.</p> <p style="text-align: right;">Page 130</p>	<p>1 A. It's 25 minutes, 10 seconds. 2 Q. Perfect. So this portion of the video, the 3 bottom of the screen, is it showing that same racial 4 demographic information that I think you said was, like, 5 the starting point that a -- that a viewer would see 6 when they're drawing district maps? 7 A. Yes. 8 Q. And those are the statistics that would 9 automatically update if a user, like, changed the 10 boundary of a draft map, those statistics would refresh? 11 A. That's correct, assuming they didn't change 12 it, yes. 13 Q. Okay. Great. Let's skip ahead to 1 hour, two 14 minutes, 55 seconds. Let me know when you're there. 15 A. I'm there, yeah. 16 Q. All right. Let's play it, please. 17 MR. BRASCHER: How many seconds? 18 MR. PIERCE: One hour, 2 minutes, 55 seconds. 19 MR. BRASCHER: Thank you. 20 (Video playing.) 21 A. How far did you want me to go? 22 Q. (By Mr. Pierce) To 1 hour, 4 minutes, 8 23 seconds. 24 A. I'm already past that. 25 Q. What feature are you explaining in that video</p> <p style="text-align: right;">Page 132</p>
<p>1 Q. -- so we get that into evidence and then we 2 can go back to the video. 3 MR. GOLDSTEIN: Michael, do -- do we want both 4 or just that second screenshot? Because it -- it shows 5 the second screen just with the menu. 6 MR. PIERCE: Sure. Let's go with the -- yeah, 7 the second screenshot then. 8 MR. GOLDSTEIN: Great. Introducing that as 9 Exhibit 15. 10 (Deposition Exhibit No. 15 was marked for 11 identification and made part of the record.) 12 Q. (By Mr. Pierce) All right. Mr. Hejazi, let 13 me know when you can see Exhibit 15. 14 A. Okay. That's just what we were looking at. 15 Q. Okay. Exhibit 15 is a screenshot of the 16 autoBound EDGE software that you just shared, which 17 shows what's on your autoBound EDGE; is that right? 18 A. Yes. 19 Q. Okay. Let's go back to the video, then, and 20 watch a couple more clips. So the video is Exhibit 12. 21 Let's skip ahead to 24 minutes, 48 seconds and let me 22 know when you're able to play it. 23 (Video playing.) 24 Q. (By Mr. Pierce) All right. You can pause it. 25 How far did you get?</p> <p style="text-align: right;">Page 131</p>	<p>1 clip? 2 A. There is a feature that allows you to display 3 some thematic -- display thematics on the map. 4 Q. And is the thematics something that comes 5 blank that AutoBound users need to add or are there sort 6 of a set of starting thematics they could select from? 7 A. No, it comes blank. You have to select what 8 you want to -- what you want to see. 9 Q. And in -- I think in the video, is it right 10 that you were explaining the functionality of the 11 thematic feature of autoBound EDGE and how you could use 12 it to select a field and then -- let me start from the 13 beginning -- or let me start over, excuse me. 14 Is it right that the -- in the video, you are 15 showing users how they could select a threshold for a 16 particular demographic statistic? 17 A. I was showing that there is the ability to 18 have a threshold for how much information you want to 19 display. 20 Q. Meaning an AutoBound user could set a 21 threshold for a particular demographic or other 22 statistic and then AutoBound would somehow indicate 23 whether certain areas were above or below a certain 24 threshold? 25 A. That's correct.</p> <p style="text-align: right;">Page 133</p>

<p>1 Q. And this was in the functionality that was in 2 the software that was licensed to Arkansas?</p> <p>3 A. Yes.</p> <p>4 Q. And is one of the -- one of the demographic 5 statistics that a user could have chosen is statistics 6 relating to the black voting age population?</p> <p>7 A. Yes, they could have chosen any number of -- I 8 mean, that, among any of the fields. They could have 9 chosen any of the fields, including -- I used black as 10 my example, but they could have chosen anything.</p> <p>11 Q. And you can choose a field including fields 12 relating to black -- black voting age population and 13 then set a threshold to -- to flag if it's above or 14 below a certain number?</p> <p>15 A. Yes, if it's -- you could -- as a percentage 16 of some other value.</p> <p>17 Q. Got it. So, for example, the black voters and 18 then total voters, you could put it together as a 19 percent of voters who are black voters and then keep 20 that above or below a certain threshold as a 21 functionality that --</p> <p>22 A. It's -- the functionality is for display 23 purposes, not for drawing purposes.</p> <p>24 Q. Meaning if -- if the value is above a 25 particular threshold, it's going to be shaded a</p> <p style="text-align: right;">Page 134</p>	<p>1 Q. Okay. Let go to one hour -- we'll fast 2 forward a couple of minutes. So we'll go to 1 hour, 6 3 minutes and -- 1 hour, 6 minutes and 53 seconds and 4 we'll watch it for about -- we'll watch it for -- we're 5 going to watch this for a few minutes.</p> <p>6 A. One hour, 7 and 53 seconds you said?</p> <p>7 Q. I'm sorry, 1 hour, 6 minutes and 53 seconds?</p> <p>8 A. Oh, 1 hour, 6 minutes and 53 seconds. Okay.</p> <p>9 Q. Let me know when you can start it. Okay.</p> <p>10 (Video playing.)</p> <p>11 A. Okay. How far did you want me to go?</p> <p>12 Q. (By Mr. Pierce) If you go to 1 hour, 11 13 minutes and 6 seconds.</p> <p>14 A. Okay. I'm past that.</p> <p>15 Q. Okay. Did the beginning of the video, I know 16 it showed -- it showed someone who was attending and I 17 think you referenced the -- the prior work with -- 18 between Citygate and state. Did that refresh your 19 recollection whether Arkansas was the audience for this 20 training?</p> <p>21 A. No -- I mean, yes, it -- it wouldn't be.</p> <p>22 Q. It was not Arkansas?</p> <p>23 A. No.</p> <p>24 Q. Okay.</p> <p>25 A. You can see that from the list of counties</p> <p style="text-align: right;">Page 136</p>
<p>1 particular color in the map, but that's not going to 2 dictate how someone draws an actual map?</p> <p>3 A. Correct. You're just --</p> <p>4 Q. Got it.</p> <p>5 A. -- it's just to display your information. 6 It's -- it's essentially a thematic map showing 7 densities of different population characteristics 8 depending on what you may be interested in seeing.</p> <p>9 Q. And -- and why did you choose -- pardon, black 10 voters as a percent of the total population as an 11 example?</p> <p>12 A. Just seemed like an easy thing to pick. It 13 wasn't any -- there wasn't any -- in other -- I'm 14 familiar with the demographics generally of Arkansas. 15 Picking Hawaii and Pacific Islanders wouldn't have shown 16 anything that would be meaningful.</p> <p>17 Q. Did anyone from Arkansas ask you about 18 functionality relating to tracking information about -- 19 tracking threshold of black voters?</p> <p>20 A. No, the -- the audio is there. I mean, 21 there's nobody -- if anybody asked questions, they would 22 have -- they would have been on the audio.</p> <p>23 Q. Well, I mean, either in this -- in this video 24 or outside of this video?</p> <p>25 A. Not that I recall specifically.</p> <p style="text-align: right;">Page 135</p>	<p>1 that came up too.</p> <p>2 Q. Right. Well, yeah, I guess I wasn't -- it 3 wasn't clear to me if you were -- if it was a training 4 for Arkansas using, like -- and you had another state's 5 data up or if it was training for another state and 6 that's why you had the other state's data up?</p> <p>7 A. No, this data was for the State of Washington 8 and I did do the work for them in 2000. That's what I 9 was talking about in the -- in the video and I was 10 explaining to them that the data that they provided me 11 to process for them was not -- was -- was not really the 12 way it should have been done and so that's -- it was 13 specific to Washington.</p> <p>14 Q. Got it. Okay. Very helpful. So Washington 15 historically used integrated voter -- you know, voting 16 data into its -- into its -- let me -- let me restart. 17 So, historically, Citygate worked with 18 Washington to integrate voting data into Washington's 19 autoBound EDGE, but didn't -- didn't do that work for 20 Arkansas?</p> <p>21 A. Not to my recollection.</p> <p>22 Q. Okay.</p> <p>23 A. And, again, let me -- let me -- I'll -- I'll 24 explain the process a little bit to you so it might help 25 you in your understanding of -- of how things work in</p> <p style="text-align: right;">Page 137</p>

<p>1 redistricting. The process of adding election and -- or 2 any political data with this voter -- voter rules or 3 election data is very time consuming and very expensive 4 and it can't be done after the fact. 5 So, for example, in the case of -- let's just 6 take the example of Washington, that work is done years 7 before redistricting starts and there is no guarantee 8 that the data that gets produced is ever going to be 9 used, but it's done in case the legislature -- 10 legislature decides to do it, because if they decide to 11 use it, then it's too late to go ahead and create it, if 12 that makes any sense. 13 Q. Got it. 14 A. So that's why I wouldn't -- see, the reason 15 I'm explaining this, even if the data is created in the 16 case of Washington, it is no guarantee that it would be 17 used. It may or may not be used. Same as in Arkansas. 18 I don't know if they created it or if they didn't, but 19 if they did, there's no guarantee that it would actually 20 be used. It could well be that the legislature decides 21 that they're not going to use it or it could be decided 22 that they are going to use it, but if they decide 23 they're going to use it, the data should have been 24 created years before because it takes years to create 25 it.</p> <p style="text-align: right;">Page 138</p>	<p>1 it? 2 A. Even if they saved it as a thematic map, all I 3 can tell you is that they saved it as a thematic map. 4 Doesn't -- doesn't mean that they looked at it. Could 5 have created it and then never used it. 6 Q. Got it. So then it's -- it sounds like -- so 7 autoBound EDGE has no record of whether a map drawer 8 viewed particular racial demographic data? 9 A. That's correct. And that's not because it's 10 intentional or we're trying to avoid looking -- avoid 11 storing that information. It's just impractical to 12 store that type of information. 13 Q. Got it. And what did you mean when you said, 14 like, this stuff is legal or evidence? 15 A. Meaning that there is a process of -- because 16 redistricting -- redistricting plans often get 17 challenged in court and then you have to produce the 18 work that you've done as a part of discovery. We take 19 some effort into storing information as much as we can 20 so that it can -- you can retrace what somebody did. 21 So information that is practical to store, we 22 do and that's what I was explaining, so that we are 23 aware that this information is something that may be 24 looked at and people are going to want to see it. So to 25 the degree that information can be captured, we -- we</p> <p style="text-align: right;">Page 140</p>
<p>1 Q. Got it. Okay. I think the last -- just one 2 more portion of the video. 3 MR. PIERCE: As it turns out, Justin, it is 4 not -- it's not past the hour and 30 minute mark, so... 5 Q. (By Mr. Pierce) Mr. Hejazi, if you're able to 6 go to 1 hour, 18 minute and then we're going to watch it 7 for two minutes, so we'll go from 1 hour, 18 minutes to 8 1 hour, 20 minutes. 9 (Video playing.) 10 Q. (By Mr. Pierce) All right. Can you -- can 11 you walk us through what you were talking about in that 12 portion of the training video? 13 A. I believe -- by the way, this is -- this 14 training was done for Washington, because I recognize 15 the voice of the individual that was talking and asking 16 the question. The question I believe was, is there 17 record of what data you've looked at, meaning if you 18 decided to display Hispanic population on your map, is 19 there some record that you looked at that piece of 20 information and I answered -- and my answer was that no, 21 we don't record that. 22 Q. Got it. So fair to say that autoBound EDGE 23 doesn't store information about whether a user viewed 24 particular racial data unless the user basically saves 25 it as a thematic map or does something similar to save</p> <p style="text-align: right;">Page 139</p>	<p>1 capture that information, but there is information 2 that's not practical to capture, like what is the person 3 looking at. 4 Q. Got it. Okay. 5 MR. GOLDSTEIN: I think, Matthew, we can put 6 up our next exhibit. I think we just have -- we have a 7 series of emails and attachments to march through. 8 MR. BRASCHER: Michael, sorry, I gotta -- I 9 would like to take a five-minute break if we can, unless 10 you've only got a few minutes left. 11 MR. PIERCE: Yeah, yeah, sure. So why don't 12 we go -- why don't we go off the record, take -- take a 13 five-minute break and then why don't we come back at 14 3:00 p.m. eastern. Does that work? 15 MR. BRASCHER: Yep. 16 THE VIDEOGRAPHER: We are off the record at 17 1:54 Central Time. 18 (A recess was taken from 1:54 p.m. To 19 2:02 p.m.) 20 THE VIDEOGRAPHER: We are back on the record 21 at 2:02 p.m. 22 MR. PIERCE: Thanks, everybody. So I believe, 23 Matthew, you just -- you just loaded an exhibit -- 24 sorry, which number? 25 MR. GOLDSTEIN: I just loaded Exhibit No. 16.</p> <p style="text-align: right;">Page 141</p>

<p>1 (Deposition Exhibit No. 16 was marked for 2 identification and made part of the record.) 3 MR. PIERCE: 16, perfect. 4 Q. (By Mr. Pierce) Okay. Mr. Hejazi, you should 5 see in front of you Exhibit 16, which is a document with 6 a Bates stamp ending in 14639 that's a July 2nd, 2021, 7 email from Shelby Johnson to you subject RE: My 8 Districting Online Customization; is that right? 9 A. Yes. 10 Q. Do you recognize this email? 11 A. Yes. 12 Q. Can you explain what's being discussed in this 13 email? 14 A. I think there was a -- something they wanted 15 to show the online portion of the software to the 16 Secretary of State and they were asking us for the 17 customizations that they had asked for, if they were 18 complete. 19 Q. Describe what those customizations were. 20 A. I can't recall. 21 Q. Any customizations related to how racial data 22 was displayed? 23 A. Probably not, because racial wouldn't have 24 been displayed in the -- in the online version. 25 Typically, we just show population information. It was Page 142</p>	<p>1 use it? 2 A. I believe so. I mean, they're asking for 3 customization. I'm looking at this email thinking that 4 they would have -- if they -- if they asked for 5 customization that they intended to actually use it. 6 Q. Other than this email, is there anything that 7 is making you think that Arkansas likely actually used 8 the online software and it went live? 9 A. I can't recall specifically, no, because we -- 10 we had -- redistricting is a very hectic time and so 11 you're generally just trying to put out fires. So you 12 don't dive deep into anything unless it is required. So 13 I wouldn't have gone in and checked on them to see what 14 their website looked like unless I had a reason to do 15 it. 16 Q. And as you sit here today, you can't recall 17 having -- 18 A. I can't -- I don't recall seeing it. I think 19 if I -- actually, if I remember correctly, one of the 20 things that Shelby wanted to do was create -- configure 21 the online system so that the localities could also do 22 redistricting without having to purchase software. So 23 he wanted to provide functionality to the localities for 24 them to draw their, you know, council districts and 25 whatnot using the software without having to pay for Page 144</p>
<p>1 likely have to do with, you know, displaying their -- 2 their logo and putting links and dates and times and 3 things like that on there. That's typically what would 4 be -- what would be asked during the customization. I 5 don't think it would have anything to do with racial -- 6 with racial data. 7 Q. And what -- what was the purpose of having an 8 on -- like, an online version? 9 A. To allow the public to view plans. 10 Q. Got it. And did -- and did you have 11 conversations with Arkansas about how they intended to 12 use the -- the online version of the software? 13 A. Not specifically. 14 Q. The online version of the software you 15 mentioned likely wouldn't have racial data. Would it 16 have the -- the voting partisanship information? 17 A. No, definitely not. 18 Q. Got it. Do you -- 19 A. I mean, that's -- I shouldn't -- to clarify, 20 they -- it is very rare to even have -- to -- to have 21 the demographic data on, let alone something as specific 22 as voter information in general. So I can't imagine 23 that Arkansas would have asked for anything like that. 24 Q. And do you know if Arkansas -- Arkansas's 25 online tool, like, did it go live? Did they actually Page 143</p>	<p>1 additional fees. I think that was one of the 2 customizations they wanted. 3 Q. Got it. Okay. We'll pull up the next 4 exhibit. Oh, and -- sorry, I guess one last question on 5 the online part. Would it allow -- this online software 6 that Arkansas had, would it allow members of the public 7 to, like, draw -- could they draw maps in it? 8 A. Technically, yes, but I don't -- I don't think 9 that functionality was ever enabled. And I say that 10 mostly because to allow that capability requires a lot 11 of horsepower on the server side, which would have 12 required us to upgrade them to a much bigger server and 13 I don't recall having done that. 14 Q. Got it. 15 A. So indirectly, I think that was not done. 16 Q. Okay. 17 MR. PIERCE: I think, Matthew, we'll pull up 18 the next exhibit. 19 MR. GOLDSTEIN: Introducing Plaintiff's 20 Exhibit 17. 21 (Deposition Exhibit No. 17 was marked for 22 identification and made part of the record.) 23 Q. (By Mr. Pierce) All right. Plaintiff's 24 Exhibit 17, it's a document Bates Stamp ending in 15994. 25 It's a July 20th, 2021, email from Jennifer Wheeler to Page 145</p>

<p>1 you subject RE: Updated User Guide For EDGE, question 2 mark; is that right?</p> <p>3 A. It's very difficult to read this. I can't -- 4 I'm actually trying to zoom into it. It's very garbled.</p> <p>5 Q. Yeah, it printed in -- it PDF'd in landscape 6 mode because there are some screenshots that were, like, 7 taken from a monitor that had a very wide --</p> <p>8 A. I can make out Jennifer Wheeler.</p> <p>9 Q. Are you able to read the text of her email?</p> <p>10 A. No.</p> <p>11 MR. GOLDSTEIN: Mr. Hejazi, if you zoom in to 12 about 250 percent and let it sit for a minute, does it 13 load the text a little clearer?</p> <p>14 THE WITNESS: It isn't. I'm actually at 250 15 percent. Let me try...</p> <p>16 MR. PIERCE: Matthew, is it the case that 17 Mr. Hejazi could also download -- does Exhibit Share 18 give him the option to download it?</p> <p>19 MR. GOLDSTEIN: I'm not sure what he can see 20 on his end.</p> <p>21 THE WITNESS: I think I can make out certain 22 words. I guess go ahead and ask your question and I'll 23 see if I can figure it out from what I'm looking at. If 24 not, then I'm going to try to see if I can figure out a 25 different way to see this.</p> <p style="text-align: right;">Page 146</p>	<p>1 A. Yeah, I've read this part, yeah. Yep.</p> <p>2 Q. (By Mr. Pierce) So I think if we can pause 3 there. That covers the portions I have questions about. 4 So if we go back to the top, when Jennifer Wheeler is 5 asking you about loading political -- "political data," 6 what did you understand her to be asking about?</p> <p>7 A. Data that's not -- doesn't come with the 8 census.</p> <p>9 Q. And -- and how do you understand your email 10 exchange with her in terms of whether Arkansas loaded 11 that -- loaded political data to AutoBound?</p> <p>12 A. Based on this, I'm guessing she was trying to 13 do it.</p> <p>14 Q. Did she eventually load political data to 15 AutoBound?</p> <p>16 A. I don't recall.</p> <p>17 Q. And -- and apologies, but political data, you 18 think of it as -- I believe you said data that's not 19 included in the census data; is that right?</p> <p>20 A. Correct. It could be election results. It 21 could be voter data. It could be any number of things. 22 It's not -- we categorize that -- all of that into one 23 grouping of political data.</p> <p>24 Q. I believe you testified earlier that, please 25 correct me if I'm wrong, loading political data --</p> <p style="text-align: right;">Page 148</p>
<p>1 MR. GOLDSTEIN: Michael, would it be helpful 2 for me to share my screen on -- on Zoom to -- it's just 3 the view of the exhibit on -- on Exhibit Share --</p> <p>4 MR. PIERCE: Yeah.</p> <p>5 MR. GOLDSTEIN: -- but I can see the text.</p> <p>6 MR. BRASCHER: Yeah, let's try that.</p> <p>7 MR. GOLDSTEIN: Okay. Let me know if you can 8 -- if you can see this.</p> <p>9 THE WITNESS: Yeah, I can -- yeah, this is 10 much more legible.</p> <p>11 Q. (By Mr. Pierce) Sorry for that. To clear up 12 the record again, it's -- we have Exhibit 17 up on the 13 screen. It's a July 20th, 2021, email from Jennifer 14 Wheeler to Mr. Hejazi subject RE: Updated User Guide for 15 Edge, question mark; is that -- is that right, 16 Mr. Hejazi?</p> <p>17 A. Yes.</p> <p>18 Q. And do you recognize this email?</p> <p>19 A. Yes. I mean, it's just an email from myself 20 and it's exchanged between myself and somebody named 21 Jennifer Wheeler.</p> <p>22 Q. Can you take a minute to review what's on the 23 screen right now?</p> <p>24 MR. PIERCE: And once you've reviewed it, 25 Matthew, can scroll down and you can --</p> <p style="text-align: right;">Page 147</p>	<p>1 loading political data takes time and should be done in 2 advance of the redistricting. Here, it's July 2021. 3 Would you expect that after this email Arkansas 4 successfully loaded all of its -- all the political 5 data?</p> <p>6 A. Preparing it takes a lot of time. Loading it 7 takes -- takes a day.</p> <p>8 Q. Did you talk with Ms. Wheeler about this -- 9 you know, loading of the political data into Arkansas's 10 -- in Arkansas's software?</p> <p>11 A. I don't recall specifically. If there was any 12 more exchanges with her, it might -- it might shed light 13 on to what -- what I -- you know, whether we set up a 14 time to meet or -- or if I guided her through it. I 15 don't know -- the problem with redistricting and problem 16 with this type of data is that a lot of people have a 17 misunderstanding of what it actually is and what it 18 takes to load it into any kind of a mapping software. 19 And so it could be that she was knowledgeable and had 20 done the prep work or it could be that I met with her 21 and told her that what she wanted to do was not 22 possible. I can't recall.</p> <p>23 Q. Would Citygate be able to tell if she did, in 24 fact, load political data?</p> <p>25 A. Tell from what?</p> <p style="text-align: right;">Page 149</p>

<p>1 Q. Would there be a way for Citygate to tell if 2 she did, in fact, load political data?</p> <p>3 A. Not -- not short of looking at the data sets.</p> <p>4 Q. In your experience working with other states, 5 is it typical that if they want to load political data, 6 they work with Citygate to load it as opposed to doing 7 it themselves without Citygate's help?</p> <p>8 A. No, they -- there is plenty of people that do 9 that kind of work. It's usually --</p> <p>10 Q. Sorry.</p> <p>11 A. -- it's usually a political process meaning -- 12 well, actually, I take that back. Sometimes the state 13 decides to do the work because one or both political 14 parties indicate that they would like to have the data. 15 So, for example, in the case of Washington, the 16 Secretary of States collect -- collects the data and 17 then they process it and make it available to all 18 parties interested.</p> <p>19 In other situations, they hire consultants. 20 There's -- there's people, the RNC, the DNC has their 21 own consultants and they also do the work themselves to 22 provide this data. Once the data is provided, meaning 23 the data is collected and provided, then loading it into 24 our software is not that hard, but preparing that data 25 is very time consuming and generally takes -- takes</p> <p style="text-align: right;">Page 150</p>	<p>1 So depending on whether you want to do all of 2 it or some of it or just a little bit of it or you may 3 just be doing a little experiment to see what it looks 4 like, it will take a variety of different amount of 5 times.</p> <p>6 Q. I think you -- you testified earlier in 7 connection with I believe it's Exhibit 12, the -- the 8 training video, that AutoBound doesn't store sort of the 9 data that a user looks at, but does it store the data 10 that the user has loaded into the system?</p> <p>11 A. Yes, that data is -- so we don't -- we don't 12 store -- we don't store the information for the purposes 13 of archiving. We simply store it for the purpose of 14 using. It's like an Excel spreadsheet. If you're using 15 it, then everything that you've done in that spreadsheet 16 is stored, but if you delete that and use a different 17 spreadsheet, then that data is stored.</p> <p>18 So it's not a -- it's not a -- it's not a -- 19 we don't have an archival process. We just load the 20 data, they use it, make plans, and then afterwards, if 21 they keep it, they keep it. If they don't keep it, it 22 gets deleted. We don't control that.</p> <p>23 Q. Got it. So if -- if Arkansas kept its files 24 associated with this software, would those files show 25 whether political data was loaded into their software</p> <p style="text-align: right;">Page 152</p>
<p>1 years of work.</p> <p>2 Q. And -- and to your knowledge, did Arkansas -- 3 it sounds like --</p> <p>4 A. I don't recall them asking us to do it and 5 short of -- I didn't even recall this conversation until 6 you just brought up this email, so I -- I don't have any 7 recollection that I did anything under -- other than 8 answer questions on the software side for them.</p> <p>9 Q. And -- and fair to say as you -- you know, as 10 you sit here today, you don't recall any further 11 discussions with Ms. Wheeler or others with Arkansas 12 about, you know, loading the political data, 13 implementation of the political data, questions about 14 how it displays?</p> <p>15 A. Correct. And I don't recall any 16 conversations, specific conversations. I mean, as -- as 17 you -- as this email points out, I'm not remembering 18 every conversation that I've had with them.</p> <p>19 And to be clear also, political data can mean 20 somebody just loads one cycle of election results. In 21 this case, let's say presidential election for 2020, 22 that might not take, you know, a year to develop. That 23 might take just a couple of days to do, but if you're 24 deciding to do every election since 2010 to 2020 for 25 every office, then that takes a lot of time.</p> <p style="text-align: right;">Page 151</p>	<p>1 that they used for drawing the 2021 redistricting maps?</p> <p>2 A. Yes, if you -- if you had the data that they 3 used, you could just open the software and quickly see 4 what fields are in the software and that would give you 5 a very clear idea of what fields are there. And the 6 census fields are obvious and then anything that's after 7 the census fields would be stuff that they would have 8 added.</p> <p>9 Q. Got it. But that's not something -- that's 10 not information that Citygate has, that's something that 11 Arkansas has?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. Okay. Thank you.</p> <p>14 MR. PIERCE: I think, Matthew, you can stop 15 screen sharing and we can pull up our next exhibit.</p> <p>16 MR. GOLDSTEIN: All right. This is going to 17 be Plaintiff's Exhibit 18.</p> <p>18 (Deposition Exhibit No. 18 was marked for 19 identification and made part of the record.)</p> <p>20 Q. (By Mr. Pierce) Okay. Plaintiff's Exhibit 21 18, it's a document Bates stamped ending in 20757. It's 22 an email meeting invitation for a meeting to be held on 23 August 9th, 2021; is that right?</p> <p>24 A. Yes.</p> <p>25 Q. Do you recognize this invitation or the</p> <p style="text-align: right;">Page 153</p>

<p>1 meeting?</p> <p>2 A. Yes.</p> <p>3 Q. What was the meeting about?</p> <p>4 A. Just they wanted to know when the data was</p> <p>5 going to be available, the census data for</p> <p>6 redistricting.</p> <p>7 Q. Got it. Did -- did you discuss, you know,</p> <p>8 data or analytical tools that would show demographics or</p> <p>9 racial demographics?</p> <p>10 A. No, I think this is just a -- this is just a</p> <p>11 meeting that was -- they wanted to know when the data</p> <p>12 was going to be available, the census data.</p> <p>13 Q. If you look at the list of meeting attendees,</p> <p>14 anyone whose name you recognize other than Shelby</p> <p>15 Johnson?</p> <p>16 A. Matthew DeLong I think was -- was a technical</p> <p>17 person that worked for -- for Shelby. No, I don't know</p> <p>18 -- I don't specifically didn't -- I didn't specifically</p> <p>19 know any of the -- the individuals attending other than</p> <p>20 the ones I just mentioned.</p> <p>21 Q. Okay. Let's go to the next exhibit.</p> <p>22 MR. GOLDSTEIN: All right. This will be</p> <p>23 Plaintiff's Exhibit 19.</p> <p>24 (Deposition Exhibit No. 19 was marked for</p> <p>25 identification and made part of the record.)</p> <p style="text-align: right;">Page 154</p>	<p>1 description of a bill.</p> <p>2 Q. Okay. What makes you think that?</p> <p>3 A. Because he's testing it on a senate plan.</p> <p>4 Q. And how do you interpret when Shelby Johnson</p> <p>5 says, "For grins I ran this style on the Draft Senate</p> <p>6 Plan I developed for research and development"?</p> <p>7 A. I interpret that as this report, he didn't</p> <p>8 think it was going to work, but he just decided to test</p> <p>9 it out just to see what it would look like.</p> <p>10 Q. Got it. And then when Johnson says, "This one</p> <p>11 is really the Congressional Districts as my fake test</p> <p>12 data, against the Senate report style just so it will</p> <p>13 run and load faster," what does that mean?</p> <p>14 A. (Witness reading to himself.) So the -- the</p> <p>15 congressional districts have fewer districts, so I think</p> <p>16 the point he's trying to make is that whatever this</p> <p>17 report is, it's not practical for a Senate plan, because</p> <p>18 the Senate has a lot more districts so it would take a</p> <p>19 lot longer and be a lot bigger report.</p> <p>20 Q. And his -- his last sentence, "When we get</p> <p>21 this finalized we can put the report template in all of</p> <p>22 your AutoBound installs so that any of you will be able</p> <p>23 to run the reports," what does that mean?</p> <p>24 A. That just means exactly what he's saying, just</p> <p>25 after the report is finalized, we can put the template</p> <p style="text-align: right;">Page 156</p>
<p>1 Q. (By Mr. Pierce) Okay. So Plaintiff's --</p> <p>2 Plaintiff's Exhibit 19 is an October 7, 2021, email from</p> <p>3 Shelby Johnson to a group of people, subject is Final</p> <p>4 Report...</p> <p>5 Is that right?</p> <p>6 A. Yeah, it's not come up yet.</p> <p>7 Q. Okay. Sorry.</p> <p>8 A. Yep, got it.</p> <p>9 Q. So an October 7, 2021, email from Shelby</p> <p>10 Johnson to a group of people subject Final Report...</p> <p>11 Is that right?</p> <p>12 A. Yeah.</p> <p>13 Q. I'm not sure you're copied on it, but I know</p> <p>14 you've gotten emails from Shelby Johnson before. Does</p> <p>15 this look like other emails you got from Shelby Johnson?</p> <p>16 A. I mean, it has his name at the bottom. I</p> <p>17 guess this is the general format of his emails.</p> <p>18 Q. Do you know what they're talking about in this</p> <p>19 email? Let me -- sorry, let me rephrase it.</p> <p>20 Any recollection of what they're talking about</p> <p>21 in -- in this email chain?</p> <p>22 A. No, but I -- I have a suspicion of what</p> <p>23 they're talking about.</p> <p>24 Q. What is your suspicion?</p> <p>25 A. I think this was just a bill report, like a</p> <p style="text-align: right;">Page 155</p>	<p>1 in the -- in their -- in their installation and then</p> <p>2 they would have access to the support. So this is about</p> <p>3 customizing a particular report.</p> <p>4 Q. Got it. And it looked -- it looks like in the</p> <p>5 top of the message there's an attachment that says</p> <p>6 Board_Test_report.pdf, that will be our next exhibit.</p> <p>7 A. Okay.</p> <p>8 MR. GOLDSTEIN: This will be Plaintiff's</p> <p>9 Exhibit 20.</p> <p>10 (Deposition Exhibit No. was marked for</p> <p>11 identification and made part of the record.)</p> <p>12 Q. (By Mr. Pierce) So Plaintiff's Exhibit 20 is</p> <p>13 a document Bates stamped ending in 412. The first page</p> <p>14 of the document is titled Board of Apportionment Report</p> <p>15 it has a last date edit October 7, 2021; is that right?</p> <p>16 A. Yes.</p> <p>17 Q. Does this document look familiar?</p> <p>18 A. It likes like a report that was generated from</p> <p>19 our software. It does not look like one that we made.</p> <p>20 Q. And how -- how are you able to tell it's</p> <p>21 generated by your software?</p> <p>22 A. It just looks -- the format is similar.</p> <p>23 Q. If we go to the second page of the PDF, what</p> <p>24 does Geography Layer mean?</p> <p>25 A. It means that the list of what -- the list</p> <p style="text-align: right;">Page 157</p>

<p>1 that -- that is following is lists from the county's 2 layer.</p> <p>3 Q. And then the Geography Layer Voting Precincts 4 near the bottom of the second page?</p> <p>5 A. The way this report is organized is District 6 1, which is showing on Page 2, it first lists the whole 7 counties that make up that district. Then is lists the 8 precincts that make up that district and the whole 9 blocks, if there were any.</p> <p>10 Q. And it looks like on the second page near the 11 bottom, under the Voting Precinct label, it says Pulaski 12 and then has a series of numbers. What are those?</p> <p>13 A. Where are you looking at now?</p> <p>14 Q. It's at the bottom of the second page, Bates 15 stamped 413, it says Geography Layer, Voting Precincts 16 and then it says Pulaski?</p> <p>17 A. Oh, it's the name of that county where the 18 precinct is.</p> <p>19 Q. And then those different column headers 20 underneath Pulaski, Total Persons, Voting Age, White 21 Black, what do those mean?</p> <p>22 A. I don't know specifically. I imagine they're 23 white alone, black alone, Hispanic, Asian alone, 24 American Indian alone and Hawaii and Pacific Islander 25 alone.</p> <p style="text-align: right;">Page 158</p>	<p>1 just like a spreadsheet. You could have several columns 2 that are not shown that total up to black.</p> <p>3 Q. Got it. But this -- is this report consistent 4 with your understanding that at the time the -- that 5 Arkansas was doing the 2021 congressional redistricting, 6 the Arkansas AutoBound users had access to 7 precinct-level data that included racial demographic 8 information?</p> <p>9 A. Yes. In general, they -- AutoBound users had 10 access to demographics which included whatever people 11 put in their census forms as far as racial categories 12 go.</p> <p>13 Q. Okay. We can pull up the next exhibit.</p> <p>14 MR. GOLDSTEIN: All right. This will be 15 Plaintiff's Exhibit 21.</p> <p>16 (Deposition Exhibit No. 21 was marked for 17 identification and made part of the record.)</p> <p>18 Q. (By Mr. Pierce) Okay. Plaintiff's Exhibit 21 19 is a document Bates stamped ending in 15378 and it's an 20 October 8th, 2021, email from Shelby Johnson to you 21 subject RE: AutoBound racial and Demographic Report 22 Assistance; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. So this is on -- let's see. If we go 25 to the -- the bottom of the email chain, it's an October</p> <p style="text-align: right;">Page 160</p>
<p>1 Q. Why do you think that's what they are?</p> <p>2 A. It's just my guess. I don't know for the 3 fact. I would have to look at the -- the way the report 4 was made and what's in it.</p> <p>5 Q. But your guess is that it's -- that black 6 means black alone is because the sort of starting point 7 for AutoBound black data is the black alone?</p> <p>8 A. No, that's not -- I mean --</p> <p>9 MR. BRASCHER: Sorry, just object to the form.</p> <p>10 Q. (By Mr. Pierce) Sorry, Mr. Hejazi. Let me 11 back up. Your basis for understanding the second page 12 of that report and what the -- what the column Black 13 represents, can you tell us what your basis for -- for 14 that understanding is?</p> <p>15 A. I don't know for a fact. I just made a guess 16 and the guess is that's probably -- if I made that 17 report, I would probably do that. I don't know if they 18 did that. Also OMB has guidelines for how to calculate 19 certain minorities. It's very possible that these are 20 the OMB guidelines.</p> <p>21 Q. How would you tell what black means? Would 22 you need to go into their AutoBound that generated this 23 report and see the screens.</p> <p>24 A. Correct. I would actually have to open up the 25 report and see what -- what is used to create. It's</p> <p style="text-align: right;">Page 159</p>	<p>1 7 email from Shelby Johnson to you. I'll give you a 2 second to read it.</p> <p>3 A. Yep.</p> <p>4 Q. What's this Board of Apportionment Report?</p> <p>5 A. I don't know.</p> <p>6 Q. This report -- well, let me restart.</p> <p>7 It looks like the screenshot that Shelby put 8 in his email to you includes racial demographic 9 information on the voting precinct and on the block 10 level; is that right?</p> <p>11 A. Yes.</p> <p>12 Q. And then if we go to the top of this exhibit, 13 Shelby says, "The modified report is based off the 14 Racial and Demographics report." Do you know what he 15 means?</p> <p>16 A. It's -- we have a report called Racial and 17 Demographic Report. Looks like they took our report and 18 customized it.</p> <p>19 Q. When you say "we have a report," you mean the 20 --</p> <p>21 A. My software does.</p> <p>22 Q. -- the AutoBound software that was licensed to 23 Arkansas for the 2021 redistricting had a -- a built-in 24 report that was called the -- the Racial and 25 Demographics Report?</p> <p style="text-align: right;">Page 161</p>

<p>1 A. Yes.</p> <p>2 Q. And that Racial and Demographics Report had</p> <p>3 racial and demographic information at the district</p> <p>4 level, the voting precinct level, and the -- the census</p> <p>5 block level?</p> <p>6 A. Depending on what -- depending on what layers</p> <p>7 the redistrict -- what layers the state used for</p> <p>8 redistricting.</p> <p>9 Q. The --</p> <p>10 A. If that's what they used. It's not universal</p> <p>11 so it's not a -- it's not -- I can't say that -- for the</p> <p>12 case of Arkansas, I believe it was, yes.</p> <p>13 Q. Is this Racial and Demographics Report, is</p> <p>14 that related to --</p> <p>15 MR. PIERCE: Sorry, Matthew, which exhibit are</p> <p>16 we on now? I think we're on 21 I think.</p> <p>17 THE WITNESS: Yes.</p> <p>18 MR. GOLDSTEIN: Yes.</p> <p>19 Q. (By Mr. Pierce) Is that-what you're</p> <p>20 describing now, the Racial and Demographics Report, is</p> <p>21 that the spreadsheet that you screen shared earlier in</p> <p>22 the deposition that showed that -- you know, that on the</p> <p>23 bottom had population totals and racial demographics as</p> <p>24 the tabs?</p> <p>25 A. No, that's the spreadsheet that you see during</p> <p style="text-align: right;">Page 162</p>	<p>1 states that use townships. There's states that use city</p> <p>2 boundaries. So depending on what the state is using,</p> <p>3 the report will reflect that.</p> <p>4 Q. Got it. And your understanding is that</p> <p>5 Arkansas was using census block, precinct, district,</p> <p>6 such that the Racial and Demographics Report available</p> <p>7 to Arkansas users during this 2021 redistricting would</p> <p>8 have included racial demographics for census block</p> <p>9 precinct and district levels?</p> <p>10 A. Not district levels, county levels.</p> <p>11 Q. County levels. Is that right?</p> <p>12 A. Yeah, so it would show the totals for the</p> <p>13 district and it would show the breakdown of how many</p> <p>14 counties there were and the demographics of each county</p> <p>15 and then it would go down to the precincts and it would</p> <p>16 list whole precincts and their demographics and then</p> <p>17 whatever blocks are left that are not part -- that are</p> <p>18 part of a precinct, it would show those.</p> <p>19 Q. And it would have racial demographics for all</p> <p>20 of those groups and subgroups?</p> <p>21 A. That's correct.</p> <p>22 MR. PIERCE: Matthew, let's introduce the next</p> <p>23 -- yeah.</p> <p>24 A. The report.</p> <p>25 Q. (By Mr. Pierce) So there's -- as you can see,</p> <p style="text-align: right;">Page 164</p>
<p>1 redistricting. This is a report that you run</p> <p>2 afterwards.</p> <p>3 Q. Got it. Okay. So the -- what we were talking</p> <p>4 about earlier I think in Exhibit 3 is what an -- an</p> <p>5 Arkansas map drawer would have had at the bottom of</p> <p>6 their screen unless they -- they changed it?</p> <p>7 A. Right.</p> <p>8 Q. And what you're talking about now, what Tab</p> <p>9 21 -- or what Exhibit 21 is about is about after you</p> <p>10 draw a map, a report -- a report that AutoBound can</p> <p>11 generate that gives you particular information?</p> <p>12 A. Yes.</p> <p>13 Q. Can you run this report on, like, a draft</p> <p>14 proposed plan?</p> <p>15 A. You can run it on any plan at any time.</p> <p>16 Q. Okay. And is -- and, sorry, just to make sure</p> <p>17 I'm understanding, the -- the Racial and Demographics</p> <p>18 Report, I was trying to understand at what level of</p> <p>19 granularity the report runs; does it go down to precinct</p> <p>20 level and census block. And I believe your testimony</p> <p>21 was that the answer is it depends, and what does it</p> <p>22 depend on again?</p> <p>23 A. It depends on what level -- what levels of</p> <p>24 geography -- so to clarify, not every state uses county,</p> <p>25 precinct and blocks for building their plans. There are</p> <p style="text-align: right;">Page 163</p>	<p>1 this -- Exhibit 21 attaches a zip file and another file</p> <p>2 so we're going to -- we're going to introduce as an</p> <p>3 exhibit one of the -- one of the attachments.</p> <p>4 MR. GOLDSTEIN: This will be Plaintiff's</p> <p>5 Exhibit 22.</p> <p>6 (Deposition Exhibit No. 22 was marked for</p> <p>7 identification and made part of the record.)</p> <p>8 MR. GOLDSTEIN: Should be an Excel file.</p> <p>9 Might take a few seconds to load.</p> <p>10 Q. (By Mr. Pierce) So Exhibit -- Exhibit 22</p> <p>11 corresponds to the Bates Stamp 15382. It's an Excel so</p> <p>12 it's not Bates stamped. It's a -- it's a spreadsheet</p> <p>13 included in the zip files attached to Exhibit 21 and its</p> <p>14 first tab is called Population Totals -- excuse me; is</p> <p>15 that right?</p> <p>16 A. Yes.</p> <p>17 Q. Do you recognize this document?</p> <p>18 A. This looks like the spreadsheet that's</p> <p>19 displayed when they're drawing maps.</p> <p>20 Q. And on the -- meaning displayed in AutoBound</p> <p>21 when a user, including an Arkansas 2021 congressional</p> <p>22 redistricting user, was -- was drawing draft maps?</p> <p>23 A. It could have been. I don't know if this is</p> <p>24 -- this is it or not.</p> <p>25 Q. Meaning this is the starting point, but the</p> <p style="text-align: right;">Page 165</p>

<p>1 Arkansas user could have customized their view to show 2 something else?</p> <p>3 A. Correct.</p> <p>4 Q. And columns -- you know, Columns A -- I guess, 5 sorry, Column L listed black. Do you know in this 6 context of the starting report in AutoBound what black 7 means in this context?</p> <p>8 A. In this context, I couldn't tell you.</p> <p>9 Q. Can you tell where this data comes from, like 10 meaning if it comes from the 2020 census or elsewhere?</p> <p>11 A. No. It's just -- this is -- looks like -- I 12 mean, it is an Excel, so I guess maybe I can open it up 13 in Excel and see what it is, but when I click it, it 14 just shows a view of it. And just from this view, I 15 can't really tell anything. This looks similar to our 16 -- to our default, or you know, our starting point or 17 default spreadsheet, but I can't tell if they've 18 modified it or not.</p> <p>19 Q. Got it. If we go back to Tab 21 -- or sorry, 20 Exhibit 21, the email where Shelby Johnson says, 21 "Attached is the Report and the compressed plan," if 22 Johnson created this particular type of report, is it 23 the type of thing that could be loaded into AutoBound 24 and then used for, you know, different purposes? Like 25 they could use this report for congressional</p> <p style="text-align: right;">Page 166</p>	<p>1 reports that Arkansas was capable of creating on its own 2 to display in AutoBound; is that fair?</p> <p>3 A. Yes, they are -- they are -- they are capable 4 of producing these.</p> <p>5 Q. All right. We'll pull up one more -- one more 6 exhibit.</p> <p>7 MR. GOLDSTEIN: Okay. This is Plaintiff's 8 Exhibit 23.</p> <p>9 (Deposition Exhibit No. 23 was marked for 10 identification and made part of the record.)</p> <p>11 Q. (By Mr. Pierce) All right. Exhibit 23 is an 12 email from Shelby Johnson to you asking for a call to 13 discuss why the AutoBound matrix defaults to black alone 14 for calculating voters age percentage. It has a Bates 15 ending in 15015; is that right?</p> <p>16 A. Okay.</p> <p>17 Q. Sorry, just to -- is that right in terms of 18 this is -- exhibit is a document Bates stamped 15015 --</p> <p>19 A. Yes, yes.</p> <p>20 Q. -- email from Shelby Johnson to you subject 21 Arkansas Follow Up Call?</p> <p>22 A. Yes.</p> <p>23 Q. Will you describe what's going on here?</p> <p>24 A. I don't remember what the issue was. It seems 25 he's -- he's asking me why -- why it defaults to black</p> <p style="text-align: right;">Page 168</p>
<p>1 redistricting. They could use it for state legislative 2 plans.</p> <p>3 A. Technically, yes.</p> <p>4 Q. What do you mean by technically -- by 5 technically?</p> <p>6 A. Technically the report can be used for 7 anything, although oftentimes we make reports specific 8 for different plan types, but there's nothing in the 9 software that prevents it from being used in any -- on 10 any plan.</p> <p>11 Q. Got it. And so Arkansas, if they generated 12 this for -- for example, for state legislative plan, 13 they could have generated a similar report, but you 14 know, focused on congressional districts?</p> <p>15 A. Correct.</p> <p>16 Q. All right. I think we can go to what might be 17 the last tab or might be the last exhibit.</p> <p>18 A. Just to clarify, I mean, it does say on this 19 as an example, Senate population on demographic report. 20 That's why I'm saying usually you would customize it, so 21 you wouldn't want to have a report that has the heading 22 of Senate population on it if you're displaying a -- a 23 congressional map.</p> <p>24 Q. Got it. This Exhibit 21, the email, and then 25 Exhibit 22 the attachment, these are the types of</p> <p style="text-align: right;">Page 167</p>	<p>1 alone for calculating voting age percentage. I don't 2 know if that was a bug that he was -- he had found that 3 voter age population was showing black population or why 4 we were using black alone for calculating percentage of 5 voting -- for calculating voting age percentage of black 6 population. I don't -- I don't -- I don't know the 7 details or I don't recall the details.</p> <p>8 Q. Did AutoBound use black alone for -- as the 9 default for calculating statistics related to black 10 either voters or black individuals?</p> <p>11 A. Yes, we did have that as our starting point.</p> <p>12 Q. Would that mean the -- like, the default 13 racial demographic report referenced in the prior tab 14 would have as its default using black alone to calculate 15 racial demographic information?</p> <p>16 A. It's -- it's possible.</p> <p>17 Q. Did --</p> <p>18 A. I mean, I don't -- I don't know what they used 19 as -- on that particular report, I don't know what they 20 used.</p> <p>21 Q. Got it.</p> <p>22 A. So -- so to explain this a little better, the 23 reasoning is if you use -- if you don't use the alone 24 populations, you end up with more population than the -- 25 than the -- than the total population.</p> <p style="text-align: right;">Page 169</p>

<p>1 Q. Because --</p> <p>2 A. You have double counts essentially.</p> <p>3 Q. Got it. What -- what I was asking is the --</p> <p>4 the default -- let me restart.</p> <p>5 In the -- the Racial and Demographics Report</p> <p>6 that sounds like it's pre-loaded into AutoBound how that</p> <p>7 report -- what metric it uses to calculate black in --</p> <p>8 in the black column in it, not the report that Arkansas</p> <p>9 customized and made on its own, but just --</p> <p>10 A. In ours, it would have matched to whatever we</p> <p>11 had in the spreadsheet, which is the black alone.</p> <p>12 Q. Okay. And is that true in terms of that --</p> <p>13 sort of the ticker that's at the bottom of the AutoBound</p> <p>14 software as a starting point where when a user is</p> <p>15 drawing a map, it provides the racial demographic</p> <p>16 information? Does that -- is that also displaying black</p> <p>17 alone?</p> <p>18 A. Yes, that's what I was talking about when I</p> <p>19 said spreadsheet.</p> <p>20 Q. Got it. Okay.</p> <p>21 MR. PIERCE: So I think, Mr. Hejazi, if we can</p> <p>22 go off the record -- if we can go off the record for a</p> <p>23 second.</p> <p>24 THE VIDEOGRAPHER: We are off the record at</p> <p>25 2:49 p.m.</p> <p style="text-align: right;">Page 170</p>	<p>1 the person who's in charge of TSS, would that refresh</p> <p>2 your memory that you had spoken with people from TSS?</p> <p>3 A. Yes.</p> <p>4 Q. And so I just want to put a bow on everything</p> <p>5 you testified to today. You and no one else from</p> <p>6 Citygate played any role in actually creating the maps</p> <p>7 for Arkansas redistricting; is that right?</p> <p>8 A. That's correct.</p> <p>9 Q. And did you or anyone from Citygate play any</p> <p>10 role in the decision where to put the lines from the</p> <p>11 Arkansas redistricting?</p> <p>12 A. No, nobody from our office was involved in</p> <p>13 that.</p> <p>14 Q. Does -- do you or anyone in your office have</p> <p>15 any knowledge of what info was used by Arkansas when</p> <p>16 making its decisions in the redistricting process?</p> <p>17 A. No.</p> <p>18 Q. And do you have any knowledge or does anyone</p> <p>19 at Citygate have any knowledge of how whatever info was</p> <p>20 provided by you guys, how that info was used?</p> <p>21 A. No, we wouldn't have any knowledge of that.</p> <p>22 MR. BRASCHER: Okay. Nothing further.</p> <p>23 MR. PIERCE: All right. I think we can go off</p> <p>24 the record.</p> <p>25 THE VIDEOGRAPHER: We are off the record at</p> <p style="text-align: right;">Page 172</p>
<p>1 (A recess was taken from 2:49 p.m. to</p> <p>2 2:57 p.m.)</p> <p>3 THE VIDEOGRAPHER: We are back on the record</p> <p>4 at 2:57 p.m. Central Time.</p> <p>5 MR. PIERCE: Thank you, everyone. Mr. Hejazi,</p> <p>6 thank you for your testimony today. I want to end just</p> <p>7 with a final question.</p> <p>8 Q. (By Mr. Pierce) The purpose of the 30(b)(6)</p> <p>9 deposition of Citygate was to learn about Citygate's</p> <p>10 role in connection with Arkansas's 2021 redistricting.</p> <p>11 Other than what we've already discussed today, anything</p> <p>12 else you think we should know about -- about that?</p> <p>13 A. No.</p> <p>14 MR. PIERCE: Okay. I think from my</p> <p>15 perspective, I don't -- I don't have any more -- any</p> <p>16 more questions.</p> <p>17 MR. BRASCHER: Okay. I have just a couple,</p> <p>18 Mr. Hejazi. We'll get you out of here real quick.</p> <p>19 THE WITNESS: Sure.</p> <p>20 CROSS EXAMINATION</p> <p>21 BY MR. BRASCHER:</p> <p>22 Q. Yeah, Okay. So -- okay. First, earlier you</p> <p>23 mentioned that you didn't know anyone off the top of</p> <p>24 your head from TSS, but you had spoken quite a bit --</p> <p>25 quite a bit to Shelby Johnson. So if Shelby Johnson is</p> <p style="text-align: right;">Page 171</p>	<p>1 2:59 p.m.</p> <p>2 (Deposition concluded at 2:59 p.m.)</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 173</p>

1 JURAT

2 THE CHRISTIAN MINISTERIAL ALLIANCE VS. JOHN THURSTON

3 JOB FILE NO. 170778

4 STATE OF OKLAHOMA

5 SS

6 COUNTY OF TULSA

7 I, FRED HEJAZI, do hereby state under oath

8 that I have read the above and foregoing deposition in

9 its entirety and that the same is a full, true and

10 correct transcription of my testimony so given at said

11 time and place, except for the corrections noted.

12

13

14 _____

15 Signature of Witness

16

17 Subscribed and sworn to before me, the

18 undersigned Notary Public in and for the State of

19 Oklahoma by said witness, FRED HEJAZI, on this

20 _____ day of _____, 2024.

21

22

23 _____

24 NOTARY PUBLIC

25 MY COMMISSION EXPIRES: _____

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1 ERRATA SHEET

2 THE CHRISTIAN MINISTERIAL ALLIANCE VS. JOHN THURSTON

3 DEPOSITION OF FRED HEJAZI

4 REPORTED BY: SHANNON S. HARWOOD, CSR, RPR, CRR

5 DATE OF DEPOSITION TAKEN: SEPTEMBER 10, 2024

6 JOB FILE NO. 170778

7 PAGE LINE IS SHOULD BE

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1 CERTIFICATE

2

3 STATE OF OKLAHOMA)

4)

5 COUNTY OF TULSA)

6

7 I, Shannon S. Harwood, a Certified Shorthand

8 Reporter in and for the State of Oklahoma, do hereby

9 certify that the foregoing is a true and correct

10 transcription of my shorthand notes of proceedings had

11 in Case Number 4:23-CV-471-DPM-DRS-JM heard on the 10th

12 day of September, 2024, and is only valid with my

13 stamped seal and my original signature.

14

15 I further certify that I am not related to nor

16 attorney for either of said parties nor otherwise

17 interested in said action.

18

19 IN WITNESS WHEREOF, I have hereunto set my hand and

20 seal this 24th day of September, 2024.

21

22

23 _____

24 Shannon S. Harwood, CSR, RPR, CRR

25

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1 Fred Hejazi

2 fhejazi@citygategis.com

3 September 24, 2024

4 RE: The Christian Ministerial Alliance v. Thurston, John

5 9/10/2024, Fred Hejazi , 30(b)(6), (#6903463).

6 The above-referenced transcript has been

7 completed by Veritext Legal Solutions and

8 review of the transcript is being handled as follows:

9 __ Per CA State Code (CCP 2025.520 (a)-(e)) – Contact Veritext

10 to schedule a time to review the original transcript at

11 a Veritext office.

12 __ Per CA State Code (CCP 2025.520 (a)-(e)) – Locked .PDF

13 Transcript - The witness should review the transcript and

14 make any necessary corrections on the errata pages included

15 below, notating the page and line number of the corrections.

16 The witness should then sign and date the errata and penalty

17 of perjury pages and return the completed pages to all

18 appearing counsel within the period of time determined at

19 the deposition or provided by the Code of Civil Procedure.

20 Contact Veritext when the sealed original is required.

21 __ Waiving the CA Code of Civil Procedure per Stipulation of

22 Counsel - Original transcript to be released for signature

23 as determined at the deposition.

24 __ Signature Waived – Reading & Signature was waived at the

25 time of the deposition.

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<p>1 _X_ Federal R&S Requested (FRCP 30(e)(1)(B)) – Locked .PDF</p> <p>2 Transcript - The witness should review the transcript and</p> <p>3 make any necessary corrections on the errata pages included</p> <p>4 below, notating the page and line number of the corrections.</p> <p>5 The witness should then sign and date the errata and penalty</p> <p>6 of perjury pages and return the completed pages to all</p> <p>7 appearing counsel within the period of time determined at</p> <p>8 the deposition or provided by the Federal Rules.</p> <p>9 __ Federal R&S Not Requested - Reading & Signature was not</p> <p>10 requested before the completion of the deposition.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 178</p>	
<p>1 The Christian Ministerial Alliance v. Thurston, John</p> <p>2 Fred Hejazi , 30(b)(6) (#6903463)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE____ LINE____ CHANGE_____</p> <p>5 _____</p> <p>6 REASON_____</p> <p>7 PAGE____ LINE____ CHANGE_____</p> <p>8 _____</p> <p>9 REASON_____</p> <p>10 PAGE____ LINE____ CHANGE_____</p> <p>11 _____</p> <p>12 REASON_____</p> <p>13 PAGE____ LINE____ CHANGE_____</p> <p>14 _____</p> <p>15 REASON_____</p> <p>16 PAGE____ LINE____ CHANGE_____</p> <p>17 _____</p> <p>18 REASON_____</p> <p>19 PAGE____ LINE____ CHANGE_____</p> <p>20 _____</p> <p>21 REASON_____</p> <p>22 _____</p> <p>23 _____</p> <p>24 (Fred Hejazi , 30(b)(6)) Date _____</p> <p>25</p> <p style="text-align: right;">Page 179</p>	

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

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