

Exhibit D

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

3 THE CHRISTIAN MINISTERIAL)
4 ALLIANCE, et al.,)
5)
6 PLAINTIFFS,)
7)
8 VS.) CASE NO.
9) 4:23-cv-471-DPM-DRS-JM
10)
11 JOHN THURSTON, in his)
12 official capacity as the)
13 Secretary of State of)
14 Arkansas,)
15)
16 DEFENDANT.)

17 -----
18 ORAL DEPOSITION OF

19 MICHELLE DAVENPORT

20 July 3, 2024
21 -----

22 ORAL DEPOSITION OF MICHELLE DAVENPORT, produced as
23 a witness at the instance of the PLAINTIFF, and duly
24 sworn, was taken in the above-styled and numbered
25 cause on the 3rd day of July, 2024, from 9:00 a.m. to
4:18 p.m., before Dana Hayden, CCR in and for the
State of Arkansas, RMR, CRR, CRC, reported by machine
shorthand, at Mitchell Williams, 425 West Capitol,
Little Rock, Arkansas, pursuant to the Federal Rules
of Civil Procedure.

APPEARANCES

FOR THE PLAINTIFFS:

Ms. Leah C. Aden
Mr. John Cusick (via videoconference)
NAACP Legal Defense & Educational Fund, Inc.
40 Rector Street, Fifth Floor
New York, NY 10006
(212) 965-2200
Laden@naacpldf.org
Jcusick@naacpldf.org

Mx. EJ Benjamin
O'Melveny & Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, California 94111
(415) 984-8864
Ebenjamin@omm.com

Ms. Ashley M. Pavel (via realtime feed)
O'Melveny & Myers LLP
610 Newport Center Drive, Suite 1700
Newport Beach, California 92660
(949) 823-7138
Apavel@omm.com

Mr. Joseph Wong (via videoconference)
Mr. Michael Skocpol (via videoconference)
NAACP Legal Defense & Educational Fund, Inc.
700 14th Street NW, Suite 600
Washington, DC 20005
(202) 682-1300
Jwong@naacpldf.org
Mskocpol@naacpldf.org

FOR THE DEFENDANT JOHN THURSTON, in his official
capacity as the Secretary of State of Arkansas:

Mr. Justin Brascher
Ms. Jordan Broyles (via videoconference)
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, Arkansas 72201
(501) 683-2520
Justin.brascher@arkansasag.gov

1 APPEARANCES (continued)

2 FOR BUREAU OF LEGISLATIVE RESEARCH AND THE WITNESS:

3 Mr. Graham Talley
4 Ms. Sarah Gold
5 Mitchell, Williams, Selig Gates & Woodyard
6 425 West Capitol, Suite 1800
7 Little Rock, Arkansas 72201
8 (501) 688-8806
9 Gtalley@mwlaw.com
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1	I N D E X		
2	July 3, 2024		
3			PAGE
4	Stipulations		1
5	Appearances		2
6	Reporter Certification		275
7	WITNESS: MICHELLE DAVENPORT		
8	Examination By Ms. Aden		7
9	Examination By Mr. Brascher		272
10			
11	EXHIBITS		
12	NO.	DESCRIPTION	MARKED
13	Exhibit 1	BLR-CMA-08775 through 877	89
14	Exhibit 2	8/31/2021 email from Matthew	104
15		Miller to Davenport and	
16		Bowen, subject: "Revised,"	
		BLR-CMA-04233	
17	Exhibit 3	8/25/2021, email from	114
18		Jennifer Wheeler to	
		Davenport, BLR-CMA-04156	
19	Exhibit 4	BLR-Byrd-FOIA-01626 to 1627	135
20	Exhibit 5	Images of House Bill 1959,	137
21		BLR-CMA-181 to 187	
22	Exhibit 6	Images of HB1960, BLR-CMA-217	145
		to 224	
23	Exhibit 7	BLR-CMA-00257	160
24	Exhibit 8	Images of HB1961, BLR-CMA-234	165
25		to 235	

EXHIBITS (continued)

Exhibit 9	Images of SB721, BLR-CMA-209 to 216	172
Exhibit 10	Images of SB722, BLR-CMA-250 to 256	174
Exhibit 11	Images of SB723, BLR-CMA-243 to 249	175
Exhibit 12	Image of SB724, BLR-CMA- 342	176
Exhibit 13	Images of HB1963, BLR-CMA-284 to 290	176
Exhibit 14	Images of HB1964, BLR-CMA-275 to 283	183
Exhibit 15	Images of SB725, BLR-CMA-291 to 299	187
Exhibit 17	Image of SB726, BLR-CMA-425 to 431	198
Exhibit 18	Image of SB727, BLR-CMA-328 to 334	205
Exhibit 19	Image of SB728, BLR-CMA-335 to 341	207
Exhibit 20	Images of maps for HB1966, BLR-CMA-348 to 354	210
Exhibit 21	Images of SB729, BLR-CMA-360 to 366	212
Exhibit 22	Images of maps for HB1968, BLR-CMA-376 to 382	214
Exhibit 23	Images for HB1969, BLR-CMA-418 to 424	216
Exhibit 24	Graphic representations of HB1970, BLR-CMA-408 to 416	216
Exhibit 25	Images of HB1971, BLR-CMA-400	220

EXHIBITS (continued)

Exhibit 26	Images of SB741, BLR-CMA-439 to 445	226
Exhibit 27	Images of HB1976, BLR-CMA-452 to 458	230
Exhibit 28	Images of HB1978, BLR-CMA-475 to 481	233
Exhibit 29	Images of SB742, BLR-CMA-488 to 494	235
Exhibit 30	P100449 to 454	240
Exhibit 31	Images of HB1980, BLR-CMA-518 to 524	243
Exhibit 32	Images of HB1981, BLR-CMA-525 to 532	244
Exhibit 33	Images of HB1983, BLR-CMA-542 to 548	245
Exhibit 34	Maps that are not Bates-stamped	249
Exhibit 35	Images of House Bill 1982, Bates-stamped BLR-CMA-533 to 541 and 571 to 577	251
Exhibit 36	Images of precincts	263

<p>Page 7</p> <p>***** PROCEEDINGS *****</p> <p>MICHELLE DAVENPORT,</p> <p>having been first duly sworn, testified as follows:</p> <p>EXAMINATION</p> <p>BY MS. ADEN:</p> <p>Q. Good morning, Ms. Davenport.</p> <p>A. Good morning.</p> <p>Q. I am Leah Aden. I am one of the counsel for the plaintiffs in this litigation, CMA, et al. versus Thurston, et al. It's nice to meet you.</p> <p>A. Very nice to meet you as well.</p> <p>Q. Do you mind stating your full name for the record and spelling your last name, please?</p> <p>A. Absolutely. Michelle Lee Davenport, D-a-v-e-n-p-o-r-t.</p> <p>MS. ADEN: I'd like to now ask everyone who is in the room with Ms. Davenport who is making an appearance for the record to please state their name and then we'll follow that by anyone putting themselves in the record virtually.</p> <p>And maybe, Graham, we can start with you.</p> <p>MR. TALLEY: I'm Graham Talley. I represent the Bureau of Legislative Research</p>	<p>Page 9</p> <p>means that you are testifying with the same duty to answer questions truthfully as though you were before a judge in a courtroom.</p> <p>Do you understand?</p> <p>A. I do.</p> <p>Q. Okay. Our court reporter, Ms. Hayden, is transcribing this deposition for us graciously and gracefully. With that in mind, please answer questions audibly and clearly. Please refrain from nodding or shaking your head so that we can have a clear transcript, which is against all human actions.</p> <p>Let me know if you do not understand a question or need me to repeat any part of it because it may be a bad question, which is bound to happen. I will do my best to rephrase. And I am not trying to trick you with questions. I want you to understand what I'm asking of you and for you to be able to understand how to respond.</p> <p>A. Absolutely.</p> <p>Q. Thank you.</p> <p>But if I ask you a question and you answer the question, I will assume that you understood my question.</p> <p>Do you understand?</p> <p>A. I do.</p>
<p>Page 8</p> <p>and the witness. And Sarah Gold is here with me, my colleague.</p> <p>MR. BRASCHER: Justin Brascher, the Arkansas Office of the Attorney General. I represent the defendants in this case.</p> <p>MX. BENJAMIN: EJ Benjamin with O'Melveny & Myers, and I'm with the plaintiffs.</p> <p>MR. CUSICK: This is John Cusick on behalf of the plaintiffs. Good morning.</p> <p>MS. ADEN: Good morning.</p> <p>MS. BROYLES: Jordan Broyles on behalf of the Secretary of State.</p> <p>MR. SKOCPOL: Michael Skocpol on behalf of LDF.</p> <p>MS. ADEN: Anyone else virtually?</p> <p>(BY MS. ADEN:)</p> <p>Q. It's possible that from time to time, people might jump up on the virtual room, but we'll ask them not to interrupt us and if on break they can identify themselves as necessary.</p> <p>A. That's perfectly acceptable.</p> <p>Q. So I'd like for today's deposition to identify some basic ground rules that we're all operating under. You are testifying under oath today, which</p>	<p>Page 10</p> <p>Q. The primary people talking today during this deposition should be you and me and the court reporter, who may ask a question of us if she needs something from us. You may also hear your counsel, Mr. Talley, object to questions. If so, the objection will be noted by the court reporter, but you still must provide a response unless Mr. Talley specifically instructs you not to.</p> <p>Do you understand?</p> <p>A. I do.</p> <p>Q. Is there any reason why you are unable to understand or answer questions truthfully today?</p> <p>A. No.</p> <p>Q. So this is not an endurance contest. If at any time you would like to take a break, please let me know. I'll work in some logistical breaks during the day, also for lunch and other breaks. The only thing I ask is that if I've already asked you a question, that you finish answering that question before we break.</p> <p>Do you understand that?</p> <p>A. Absolutely. And I agree completely.</p> <p>Q. Thank you.</p> <p>So to be clear, you are represented by counsel today?</p>

Page 11	Page 13
<p>1 A. I am.</p> <p>2 Q. Okay. And who is that?</p> <p>3 A. Mr. Graham Talley of Mitchell Williams.</p> <p>4 Q. Okay. Besides Mr. Talley, have you worked with</p> <p>5 any other attorneys at Mitchell Williams?</p> <p>6 A. In what capacity? On this case or in other</p> <p>7 matters?</p> <p>8 Q. In this case.</p> <p>9 A. No.</p> <p>10 Q. Okay. Do you have a signed engagement letter or</p> <p>11 retainer with Mitchell Williams?</p> <p>12 A. I do not.</p> <p>13 Q. In addition to the Mitchell Williams Law Firm,</p> <p>14 without going into the content of any of the</p> <p>15 discussions, have you sought legal advice from any</p> <p>16 other attorneys about this case?</p> <p>17 A. No, ma'am.</p> <p>18 Q. So have you sought legal advice from any</p> <p>19 attorneys about congressional redistricting in</p> <p>20 Arkansas?</p> <p>21 A. No.</p> <p>22 Q. So you have not consulted with any attorneys for</p> <p>23 the Arkansas Senate about congressional redistricting?</p> <p>24 A. No.</p> <p>25 Q. Attorneys for the Arkansas House, have you</p>	<p>1 Q. What did you do to prepare for today's</p> <p>2 deposition?</p> <p>3 A. I had a meeting with Mr. Talley on Monday to get</p> <p>4 a copy of my previous deposition in a different case</p> <p>5 that dealt with congressional redistricting, and I</p> <p>6 took that home and read that document.</p> <p>7 Mr. Talley had several exhibits from, I</p> <p>8 believe, a previous deposition that I flipped through</p> <p>9 in the office, some emails and previous PowerPoints,</p> <p>10 and I reviewed those briefly. But primarily, I read</p> <p>11 my deposition from the previous case.</p> <p>12 Q. And Monday, are you referring to this past</p> <p>13 Monday?</p> <p>14 A. I am. I was out of town for ten days prior to</p> <p>15 that. So from when I received notice of the</p> <p>16 deposition, there was no time, so...</p> <p>17 Q. Okay. And you mentioned a previous deposition.</p> <p>18 Is that the state-filed lawsuit challenging</p> <p>19 congressional redistricting --</p> <p>20 A. Yes.</p> <p>21 Q. -- that you're referring to?</p> <p>22 A. Yes, it is.</p> <p>23 Q. Okay. And you mentioned looking at it in the</p> <p>24 office. What office is that?</p> <p>25 A. This office.</p>
Page 12	Page 14
<p>1 consulted --</p> <p>2 A. No.</p> <p>3 Q. -- with them about congressional redistricting?</p> <p>4 A. No.</p> <p>5 I apologize. I'll let you finish your</p> <p>6 question before I answer.</p> <p>7 Q. Did you bring any materials with you today to</p> <p>8 the deposition?</p> <p>9 A. I did not.</p> <p>10 Q. And do you have any documents in front of you</p> <p>11 right now?</p> <p>12 A. No.</p> <p>13 Q. So I want to discuss what you did to prepare for</p> <p>14 today's deposition.</p> <p>15 When were you first contacted about</p> <p>16 potentially being deposed in this case?</p> <p>17 A. In this particular case, it was -- I want to say</p> <p>18 about four weeks ago, Marty Garrity from the Bureau</p> <p>19 contacted me that there would be a request for my</p> <p>20 deposition in this matter.</p> <p>21 Q. Is that the only way you learned about today's</p> <p>22 deposition?</p> <p>23 A. Yes. And she let me know that Mr. Talley would</p> <p>24 be in contact with me and provide a subpoena in that</p> <p>25 matter.</p>	<p>1 Q. And outside of that one meeting, you did not</p> <p>2 meet with Mr. Talley in preparation for today's</p> <p>3 deposition?</p> <p>4 A. I did not.</p> <p>5 Q. Who else was with you during that preparation,</p> <p>6 besides Mr. Talley?</p> <p>7 A. No one.</p> <p>8 Q. Do you know approximately how long you met to</p> <p>9 prepare with him?</p> <p>10 A. It was between an hour, hour and a half, I</p> <p>11 believe.</p> <p>12 Q. And you mentioned some emails and other</p> <p>13 documents that were related to the -- an earlier case.</p> <p>14 Was that the same state-level case that</p> <p>15 you're referring to?</p> <p>16 A. Yes, it was.</p> <p>17 Q. Did you discuss today's deposition with anyone</p> <p>18 else besides Mr. Talley?</p> <p>19 A. Not the particular subject matter, other than to</p> <p>20 let my current employer know that I had been</p> <p>21 subpoenaed for a case that dealt with congressional</p> <p>22 redistricting, nothing further than that, and that I</p> <p>23 would be out of the office and unavailable during the</p> <p>24 course of this time. And then, also, that I would</p> <p>25 provide a copy of the subpoena.</p>

<p>Page 15</p> <p>1 Q. Who is your current employer?</p> <p>2 A. The Arkansas Department of Transportation.</p> <p>3 Q. And who in particular did you inform about --</p> <p>4 A. I would have informed both Kevin Thornton and --</p> <p>5 who is the -- I'm trying to get everybody's title</p> <p>6 correct -- the chief engineer of operate -- excuse me,</p> <p>7 of administration, and then Lorie Tudor, who is the</p> <p>8 director of the department.</p> <p>9 Q. How long have you worked with the Department of</p> <p>10 Transportation?</p> <p>11 A. Just over a year and a month. This time. I</p> <p>12 previously was employed there.</p> <p>13 Q. When were you previously employed there?</p> <p>14 A. I was employed there from 2003 through 2017, and</p> <p>15 then I went to the Bureau.</p> <p>16 Q. The Bureau of?</p> <p>17 A. Of Legislative Research.</p> <p>18 Q. And you were at the Bureau of Legislative</p> <p>19 Research -- can we refer to it as BLR?</p> <p>20 A. Absolutely.</p> <p>21 Q. From 2017 until approximately a year and a month</p> <p>22 ago?</p> <p>23 A. June -- June 2023.</p> <p>24 Q. And approximately when in 2017 did you join the</p> <p>25 Bureau?</p>	<p>Page 17</p> <p>1 Q. And that's true of any of the work of BLR?</p> <p>2 A. That's correct.</p> <p>3 Q. What steps does BLR take to ensure it remains</p> <p>4 nonpartisan?</p> <p>5 A. We are very careful in our drafting in that we</p> <p>6 provide, if requested, the information only that's</p> <p>7 requested. If there's additional information, we</p> <p>8 provide the member notice that there's additional</p> <p>9 information available, if they would like to have</p> <p>10 that.</p> <p>11 We work for all members equally. Our</p> <p>12 time is dedicated equally to every member. Every</p> <p>13 member's request is treated the same. There is no</p> <p>14 preferential treatment given to any party. We simply</p> <p>15 perform those requests and functions as each</p> <p>16 individual -- as if all 135 members are individual</p> <p>17 clients and they are coming to us with a question.</p> <p>18 Q. If you provide information to one particular</p> <p>19 member at their request, is it your responsibility to</p> <p>20 share that same information with all the other 134</p> <p>21 members in order to treat them equally?</p> <p>22 A. No, we do each request as a confidential</p> <p>23 request. If that member would like to share the</p> <p>24 information that is provided, that's up to the member.</p> <p>25 We provide information on a confidential basis to each</p>
<p>Page 16</p> <p>1 A. It would have been July. Early July of 2017.</p> <p>2 Q. What is BLR?</p> <p>3 A. BLR is the Bureau of Legislative Research.</p> <p>4 We're a nonpartisan agency, that is the research and</p> <p>5 legal research and drafting arm of the Arkansas</p> <p>6 legislature. They also provide fiscal services and</p> <p>7 review information for the legislative members.</p> <p>8 Q. What does nonpartisan -- a nonpartisan staff</p> <p>9 member of BLR mean to you?</p> <p>10 A. It means that we are there to provide the</p> <p>11 technical services. We do not involve making any</p> <p>12 policy decisions on behalf of the legislature. We are</p> <p>13 simply a technical resource for them for both the</p> <p>14 drafting and research on a nonpartisan basis. We do</p> <p>15 not engage in either -- we represent all 135 members,</p> <p>16 regardless of what party they belong to.</p> <p>17 Q. So was it -- is it fair to say that you carry</p> <p>18 out -- you carry out their research requests related</p> <p>19 to policy? Is that fair to say?</p> <p>20 A. I would say we research any question that a</p> <p>21 member may present to us, whether that be a policy</p> <p>22 question or a practical data analysis question.</p> <p>23 Q. But the BLR itself does not propose any</p> <p>24 particular legislation or policy?</p> <p>25 A. That's correct.</p>	<p>Page 18</p> <p>1 member, when they request, on that request. We do not</p> <p>2 disclose what research or even if we've done research</p> <p>3 for a member to another member of the body.</p> <p>4 Q. And is it -- my understanding correct that</p> <p>5 legislative members, for example, don't have a chief</p> <p>6 of staff here in Arkansas, that the BLR is, in fact,</p> <p>7 serving as staff to each of the members of the</p> <p>8 legislature? Is that a fair characterization?</p> <p>9 A. I'm not sure how I would characterize it as a</p> <p>10 chief of staff, but I do know that each member has</p> <p>11 access to all the members of the Bureau to perform</p> <p>12 those functions. So if they have a fiscal question,</p> <p>13 we direct it to our fiscal officers. If they have a</p> <p>14 legal question, it gets directed to me.</p> <p>15 I don't know if -- some members may have</p> <p>16 staff of their own, but that's however an individual</p> <p>17 member. We just provide those services uniformly to</p> <p>18 all 135 members.</p> <p>19 Q. And if a member directs you to work with a</p> <p>20 member of their particular staff, are you authorized</p> <p>21 to engage with a particular staff member of the</p> <p>22 legislature?</p> <p>23 A. Yes. If we are given specific instructions to</p> <p>24 work with that person, yes. But otherwise, it remains</p> <p>25 confidential between the member. We have to have</p>

<p>Page 19</p> <p>1 explicit direction of who we can disclose any 2 information, even if they're -- a request has been 3 made. 4 Q. Does the Bureau provide any research or other 5 work on behalf of the public? 6 A. Unless it comes from a member's request, no, in 7 the legal drafting area. I do not know if our 8 research division, which is tasked with some 9 educational reporting requirements, I believe those 10 are at the request of the membership. However, I 11 don't work in that area, so I couldn't speculate as to 12 that specific aspect. But I know for the work as a 13 legal drafter, it has to be originated with one of the 14 135 members. 15 Q. So to be clear, when you worked for BLR, you did 16 research and legal drafting. Is there anything else? 17 A. Those were my primary areas of responsibility. 18 Q. Did you discuss today's deposition with any 19 Arkansas legislators? 20 A. No. No. 21 Q. Did you discuss today's deposition with any 22 other BLR staff? 23 A. Other than the conversation with Ms. Garrity 24 when she informed me that there would be -- that I was 25 being requested for another deposition, no.</p>	<p>Page 21</p> <p>1 not read the actual complaint to know what was being 2 alleged. 3 Q. And what was that assumption based on? 4 A. Based on the previous case, that that was the 5 allegation in the state matter. 6 Q. Outside of the previous state matter, are you 7 aware of any other litigation besides this one 8 challenging the congressional map? 9 A. In Arkansas? 10 Q. In Arkansas. 11 A. I believe I read in the paper there was one 12 other lawsuit, but I was -- did not have an 13 opportunity to follow that. 14 Q. Okay. Have you ever worked with any members of 15 Christian Ministerial Alliance? 16 A. In what capacity? 17 Q. In any capacity. 18 A. The name is very familiar. I do not recall 19 specifically if I worked with them at all during 20 the -- but I do know the name, but I do not recall 21 specifically if I worked with them at any point. 22 Q. Do you recall any association of working with 23 them related to congressional redistricting -- 24 A. No. 25 Q. -- this cycle?</p>
<p>Page 20</p> <p>1 Q. Did you review the amended -- any complaints 2 filed in this particular litigation? 3 A. I have not. 4 Q. And outside of the deposition transcript of your 5 own from a previous state case, have you reviewed any 6 deposition -- other deposition transcripts related to 7 congressional redistricting? 8 A. No, I have not. 9 Q. Is there anything else that you did to prepare 10 for today's deposition that you haven't previously 11 said? 12 A. I alerted my staff that I would be out of the 13 office this morning and did not know what time I would 14 be returning and, likewise, let my family know. But 15 other than that, no. 16 Q. Okay. Do you have an understanding of what 17 types of claims are being brought in this particular 18 lawsuit? 19 A. I do not, other than just I know it's a 20 challenge to the congressional redistricting. I have 21 not had an opportunity to read the complaint. 22 Q. So are you aware that there are claims of racial 23 discrimination in the design of the congressional 24 enacted map? 25 A. That was my assumption. However, again, I did</p>	<p>Page 22</p> <p>1 A. No. 2 Q. Do you know who Bishop Kennebrew is? 3 A. No. 4 Q. Okay. So do you understand him to -- do you 5 understand Christian Ministerial Alliance to be an 6 organizational plaintiff in this litigation? 7 A. No, I did not realize that. 8 Q. Okay. Do you know, have you met, or have you 9 worked with anyone by the name of Patricia Brewer? 10 A. Not that I recall. 11 Q. How about Carolyn Briggs? 12 A. Not that I recall. 13 Q. Lynette Brown? 14 A. Again, I do not recall anyone by that name. 15 Q. Mable Bynum? 16 A. No. I'm sorry. 17 Q. Velma Smith? 18 A. I don't believe so. 19 Q. And so do you understand any of those 20 individuals to be individual plaintiffs in this 21 litigation? 22 A. No. I was not aware. 23 Q. So you mentioned having been deposed in the 24 state challenge to the congressional map, the 2021 25 congressional map; that's fair to say?</p>

<p>Page 23</p> <p>1 A. That's correct.</p> <p>2 Q. And were you deposed in your professional</p> <p>3 capacity?</p> <p>4 A. I was.</p> <p>5 Q. Is it fair to say that that state litigation was</p> <p>6 also raising claims of racial discrimination related</p> <p>7 to the 2021 congressional map?</p> <p>8 A. That was my understanding.</p> <p>9 Q. Outside of being deposed in that state</p> <p>10 litigation, have you ever been deposed before?</p> <p>11 A. No, I have not.</p> <p>12 Q. Before today?</p> <p>13 A. No. This is my second deposition.</p> <p>14 Q. Have you ever been a party to any lawsuit in</p> <p>15 either your personal or professional capacity?</p> <p>16 A. Yes -- well, again, I'll clarify that. I have</p> <p>17 not been a party to anything in my personal capacity.</p> <p>18 As a professional attorney, and</p> <p>19 especially now in my role of chief counsel of the</p> <p>20 Department of Transportation, I am the counsel for</p> <p>21 every single condemnation case filed in the State, as</p> <p>22 well as my -- so, yes, my name is -- I'm a party as a</p> <p>23 attorney, not as a litigant, plaintiff or defendant.</p> <p>24 Q. And in any of the litigation where you've been</p> <p>25 named professionally in a lawsuit, have -- have any of</p>	<p>Page 25</p> <p>1 When were you born?</p> <p>2 A. I was born in 1976.</p> <p>3 Q. And what is your place of birth?</p> <p>4 A. Stuttgart, Arkansas.</p> <p>5 Q. And what county is that in?</p> <p>6 A. That is in Arkansas County.</p> <p>7 Q. Where did you grow up?</p> <p>8 A. I grew up in Beebe, Arkansas, which is White</p> <p>9 County, Arkansas.</p> <p>10 Q. And where do you currently live?</p> <p>11 A. In Little Rock, Arkansas.</p> <p>12 Q. How long have you lived here?</p> <p>13 A. I have lived here since 1998.</p> <p>14 Q. Have you ever lived outside of Arkansas?</p> <p>15 A. No.</p> <p>16 Q. Have you ever lived in any other counties in</p> <p>17 Arkansas?</p> <p>18 A. Yes. Washington County, while I was in college.</p> <p>19 Q. And where did you attend college?</p> <p>20 A. University of Arkansas in Fayetteville.</p> <p>21 Q. So outside of Arkansas County, Beebe County --</p> <p>22 A. Beebe is the town, in White County.</p> <p>23 Q. White. I'm sorry.</p> <p>24 White County and Washington County?</p> <p>25 A. That's correct.</p>
<p>Page 24</p> <p>1 the claims involved allegations of racial</p> <p>2 discrimination?</p> <p>3 A. No. And let me clarify. I'm not named as a</p> <p>4 professional, in my professional capacity, in those</p> <p>5 lawsuits. I am providing the representation --</p> <p>6 Q. Gotcha.</p> <p>7 A. -- for the commission in that matter.</p> <p>8 Q. But none that you're aware of involving claims</p> <p>9 of racial discrimination?</p> <p>10 A. No. I know that the commission has had some</p> <p>11 claims of racial discrimination in the employment</p> <p>12 arena; however, again, I've not been named. And at</p> <p>13 this time the Attorney General's Office has been</p> <p>14 representing the commission in those matters.</p> <p>15 Q. Okay. So have you been involved, outside of the</p> <p>16 state litigation where you were deposed related to the</p> <p>17 2021 congressional map, and this litigation, have you</p> <p>18 been involved in any other litigation related to</p> <p>19 voting rights?</p> <p>20 A. No.</p> <p>21 Q. Have you ever testified in court before?</p> <p>22 A. I have not.</p> <p>23 Q. So I want to learn just a little bit more about</p> <p>24 your particular background before we dive more into</p> <p>25 issues with this case.</p>	<p>Page 26</p> <p>1 Q. And Little Rock is Pulaski County?</p> <p>2 A. That's correct.</p> <p>3 Q. Have you lived in any other counties in</p> <p>4 Arkansas?</p> <p>5 A. I have not.</p> <p>6 Q. Now, you mentioned going to the University of</p> <p>7 Arkansas at Fayetteville. What did you study when you</p> <p>8 were there?</p> <p>9 A. I actually have a double major in geography and</p> <p>10 political science.</p> <p>11 Q. And what does that mean? What did you study in</p> <p>12 particular when you studied geography and political</p> <p>13 science?</p> <p>14 A. I studied human geography, everything related</p> <p>15 to -- had dendrochronology, which is tree ring</p> <p>16 studies, some climatology, but primarily it was a</p> <p>17 study of how the environment affects people. I did a</p> <p>18 water law independent study during that time.</p> <p>19 The political science degree was a very</p> <p>20 general political science degree. Primarily finished</p> <p>21 my fourth year when I decided I did not want to pursue</p> <p>22 going into geography as a professor and decided to go</p> <p>23 to law school.</p> <p>24 Q. In studying geography, did that entail in</p> <p>25 studying the particular geography of Arkansas?</p>

<p>Page 27</p> <p>1 A. In some manners, yes, as well as some early 2 forms of computer drafting for mapping. But it was -- 3 that was a primary reason I chose not to go in the 4 field, as it was DOS-based and not Windows-based, and 5 I'm not a computer person.</p> <p>6 Q. In looking at Arkansas geography, did you 7 consider where particular racial communities live in 8 Arkansas as part of that study?</p> <p>9 A. I did not. I was primarily focused on the 10 physical geography of Arkansas at that time.</p> <p>11 Q. And does that mean where the rivers are, 12 mountains are, lakes are?</p> <p>13 A. That's correct. The -- Arkansas has a fairly 14 unique physical geography with some dividing factors 15 at a diagonal, including certain mountain ranges in 16 the Ouachita Mountains, the Boston Mountain range in 17 Northwest Arkansas. We have a unique feature called 18 Crowley's Ridge which provides the dividing line 19 between the Delta and the urban -- or, excuse me, the 20 timberlands of the Ouachita Mountains versus the Delta 21 that comes at a diagonal. So it was a study of those.</p> <p>22 And particularly, I was focused on the 23 environmental impacts of that terrain and geography, 24 especially on water resources.</p> <p>25 Q. What do you mean by "the Delta"?</p>	<p>Page 29</p> <p>1 the way to Texarkana for certain kinds of clay and 2 what we consider alluvial deposits from the Delta.</p> <p>3 And, again, I'm reaching back 30 years 4 into my geography basis, but that's the type of items 5 we would be looking at and -- versus limestone, 6 primarily, deposits in the Ozark region.</p> <p>7 Q. And did any of that study include looking at the 8 various economies tied to the land in Arkansas -- in 9 different parts of Arkansas?</p> <p>10 A. That was not a course that I took at that time.</p> <p>11 Q. Okay. And in terms of your political science 12 study, were you ever exposed to any of the teachings 13 about how political parties developed in this country?</p> <p>14 A. I'm sure I was. I don't recall specifically the 15 courses, but I know I took a class in American 16 government, and I know I took multiple classes in the 17 government systems of other nations, but I don't 18 recall specifically if that was part of that course.</p> <p>19 Q. Do you recall whether or not you were exposed to 20 any teachings about how different racial groups have 21 mobilized behind particular political parties over the 22 course of history?</p> <p>23 A. That was not an area that I was directly 24 studying, no. It may have come up in different 25 classes, but I don't recall.</p>
<p>Page 28</p> <p>1 A. The Delta is considered the Mississippi Valley 2 Delta, it was the area adjacent to the Mississippi 3 River that had additional alluvial deposits. And so 4 geographically it is considered a separate entity in 5 its physical geography makeup from the Ouachita 6 Mountain range to the west and the Boston Mountain 7 range in the Ozarks to the northwest, that move into 8 Central Arkansas.</p> <p>9 Q. Would you consider the Delta to have a similar 10 geography to the Ozarks?</p> <p>11 A. No.</p> <p>12 Q. What -- are there any other regions of Arkansas 13 outside of the Delta that you would consider having 14 similarities to it?</p> <p>15 A. To the Ozarks?</p> <p>16 Q. I'm sorry. Let me strike that.</p> <p>17 Are there other regions that are similar 18 to the Delta in your opinion?</p> <p>19 MR. TALLEY: Object. Form.</p> <p>20 Go ahead.</p> <p>21 A. It would depend on what type of characteristics 22 you're looking for. If you're talking about the 23 bedrock formations on a geological basis, we would 24 need to look at which types of areas had more 25 sandstone versus limestone. And that could extend all</p>	<p>Page 30</p> <p>1 Q. You mentioned getting a law degree.</p> <p>2 A. That's correct.</p> <p>3 Q. Do you mind telling me where you got that from?</p> <p>4 A. William Bowen. And it's UALR William H. Bowen 5 School of Law here in Little Rock.</p> <p>6 Q. And what year did you receive did your degree?</p> <p>7 A. I graduated in 2001.</p> <p>8 Q. And have you been practicing consistently since 9 then?</p> <p>10 A. I have.</p> <p>11 Q. And were you barred in the same year?</p> <p>12 A. I was.</p> <p>13 Q. And are -- where are you barred?</p> <p>14 A. Here in Arkansas. And no other states.</p> <p>15 Q. Do you have any certificates in any specific 16 topics?</p> <p>17 MR. TALLEY: Object to form.</p> <p>18 Go ahead.</p> <p>19 (BY MS. ADEN:)</p> <p>20 Q. Do you have any specialized training, outside of 21 studying -- like your undergraduate studies and going 22 to law school, do you have any other specialized 23 training that I could be aware of?</p> <p>24 A. Not specifically that I can think of that 25 would...</p>

<p>Page 31</p> <p>1 Q. Have you ever taken any specialized training in 2 redistricting?</p> <p>3 A. No.</p> <p>4 Q. Do you have any social media accounts?</p> <p>5 A. I do.</p> <p>6 Q. Which ones?</p> <p>7 A. I have a Instagram account and a Facebook 8 account.</p> <p>9 Q. How long have you maintained the Instagram 10 account?</p> <p>11 A. I do not have any idea of when I started that. 12 It -- probably over 10 years.</p> <p>13 Q. And how long have you maintained your Facebook 14 account?</p> <p>15 A. Probably 14-ish. I do not have -- and then I do 16 have a TikTok account. I know.</p> <p>17 Q. What is your handle for your Instagram account?</p> <p>18 A. It is mhartzdavenport -- I might have to check 19 my Instagram on my phone to see, but I believe it's 20 mhartzdavenport.</p> <p>21 Q. And how about Facebook? Is it searchable under 22 your name?</p> <p>23 A. Absolutely. It should be under Michelle Hartz 24 as -- as my maiden name but it -- used as my middle 25 name, Davenport.</p>	<p>Page 33</p> <p>1 post on that -- those platforms in your -- solely in 2 your personal capacity?</p> <p>3 A. Solely in my personal capacity.</p> <p>4 Q. Okay. I want to turn to the 2020 redistricting 5 cycle and focus on congressional redistricting.</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Separate from your title with the Bureau since 8 2017, can you explain to me what you understood to be 9 your role with BLR during the last redistricting 10 cycle?</p> <p>11 A. Absolutely. One of my areas of responsibility 12 for drafting with the Bureau was the State Agencies 13 committee and anything that was assigned to the State 14 Agencies committee. We were broken up into subject 15 matter areas that we handled for drafting and so if a 16 matter was going to touch multiple state agencies, it 17 would be assigned to me, and redistricting was one of 18 those items that traditionally had been through the 19 State Agencies committee in previous redistricting 20 cycles. So I was informed in late 2020 that anything 21 that came up with congressional redistricting would 22 fall into my drafting area.</p> <p>23 Q. Do you know about when in late 2020?</p> <p>24 A. It was prior to the session beginning in 25 January, but it -- probably December, just in</p>
<p>Page 32</p> <p>1 Q. And that is H-e-a-r --</p> <p>2 A. H-a-r-t-z.</p> <p>3 MR. TALLEY: A lot of Hartz in Arkansas 4 County.</p> <p>5 THE WITNESS: There are. 6 (BY MS. ADEN:)</p> <p>7 Q. And your Tiktok handle?</p> <p>8 A. I believe it's the same, mhartz -- or mhartz or 9 mhartzdavenport. I don't actually recall. I don't 10 post on there.</p> <p>11 Q. Do you ever remember -- recall commenting on 12 congressional redistricting on any of these social 13 media platforms?</p> <p>14 A. Absolutely not.</p> <p>15 Q. Do you recall ever commenting on any of your 16 professional obligations while working for BLR?</p> <p>17 A. Absolutely not.</p> <p>18 And I forgot one other. LinkedIn. I do 19 have a LinkedIn profile.</p> <p>20 Q. And how long have you maintained that?</p> <p>21 A. Again, I probably started it when I was at the 22 department the first time, so maybe 14 years.</p> <p>23 Q. But similar to Instagram --</p> <p>24 A. Absolutely.</p> <p>25 Q. -- Facebook, Tiktok, it's your position that you</p>	<p>Page 34</p> <p>1 preparation, knowing that it was going to be coming, 2 that I would take the role in drafting.</p> <p>3 Q. And drafting maps? Would it include drafting 4 maps, congressional maps?</p> <p>5 A. At that time I don't know if we had even decided 6 how we were going to handle the map drafting versus 7 the bill drafting. I knew I would be responsible for 8 the final bills when they would be presented.</p> <p>9 Q. In terms of the final bills, what do you mean by 10 that?</p> <p>11 A. I mean the actual bills that are presented and 12 filed with the House or Senate that are presented to 13 the membership and voted on.</p> <p>14 Q. And those are textual bills? They are not 15 visual representations of maps; is that fair to say?</p> <p>16 A. That's correct.</p> <p>17 Q. And drafting congressional redistricting bills, 18 is that something that you use computer programs to 19 do?</p> <p>20 A. That is correct.</p> <p>21 Q. And do you push a button and the text appears, 22 or do -- can you describe how --</p> <p>23 A. It is actually a very manual process. So the 24 way that we draft for all bills, not just 25 congressional redistricting, is we take the language</p>

<p>1 of the code that is in existence. We have a Word copy 2 of that code language, and we provide strike-throughs 3 and underlines for any change to the Arkansas Code. 4 So it's a strike-through if it's going 5 to be deleted, it's an underline if it's going to be 6 added. So in most drafting, unless it's completely 7 whole cloth, new legislation, that would have all 8 underlined language, you will have the original part 9 of the code with the strike-throughs and underlines of 10 anything that is changing to that code. 11 So the -- it's a Word processing program 12 with, I believe, some macros that our IT department at 13 the Bureau created to help the formatting of that 14 process. 15 Again, I don't know the details of that, 16 but we use that particular program to draft language, 17 and it's all manual. You typed the counties, you type 18 all of the information that's changing into the text 19 of the bill. 20 Q. And you're doing that on top of -- is it fair to 21 say you'd be doing that on top of -- you'd be making 22 strike-throughs/changes to the previous bill for the 23 2011 congressional map? 24 A. That's correct. 25 MR. TALLEY: Object. Form.</p>	<p>Page 35</p> <p>1 A. As we were coming into a legislative session, I 2 did not do much preparation at that time until we knew 3 if the -- we knew the data was going to be delayed, at 4 least towards the end of session. So I did not spend, 5 other than to know I was on a LISTSERV for NCSL that I 6 could go back to if I needed to, but that was the -- 7 very minimal preparation. It was really the summer of 8 2021 that I began my research and really familiarizing 9 myself with the redistricting process. 10 Q. How did you do that? 11 A. I read case law. I researched redistricting 12 cases and read case law. NCSL provided a book that 13 was called the Red Book that was a general hornbook 14 overview of the redistricting process. So I read 15 through that document. And then I also attended a 16 NCSL redistricting seminar in Salt Lake City. 17 I did listen to, I believe, a few of the 18 Webinars that NCSL also hosted for redistricting, and 19 I may have gone back and watched a previously 20 recorded, but I don't recall specifically which ones. 21 Q. Do you recall any of the cases that you 22 particularly read? 23 A. At this point, no. I had a notebook -- or not a 24 notebook, but I had printed them out, would read them, 25 and then move on, but I don't recall any of those at</p> <p>Page 37</p>
<p>1 That's just tactical. It would have 2 been an act that got codified, so... 3 (BY MS. ADEN:) 4 Q. Who told you that you would be working on 5 congressional redistricting? 6 A. I believe it was Matthew Miller. 7 Q. Would you consider him your supervisor when you 8 were with BLR? 9 A. We had several different. Joi Leonard was my 10 direct supervisor. And Matthew Miller is the 11 assistant director, and he is responsible for both 12 legal and statutory review, as well as our rules 13 committee. But Matthew and I worked very closely 14 together, as he had previously been an election law 15 drafting attorney, and so he actually was my backup. 16 So he and I talked about those issues, so I'm assuming 17 that's who told me at that point I would be drafting 18 that. 19 Q. So is it fair to say that -- when would you say 20 the redistricting cycle started for you? 21 A. I was aware of the census data in -- being 22 conducted in 2020. I'd say the redistricting cycle 23 began when I found out I would be drafting in late 24 2020. I began preparing for that. 25 Q. How did you begin preparing?</p> <p>Page 36</p>	<p>1 this time. It's been too long. 2 Q. Did you engage in that reading and research for 3 your own purposes, or did you convey that information 4 to anyone else? 5 A. I initiated that research for my own purposes. 6 I -- it was my responsibility, and I view -- take that 7 very seriously that I want to understand the process 8 and understand what other states have done. So that 9 part was taken on, on my own. But as to conveying it, 10 I did do a PowerPoint presentation for the legislature 11 before the redistricting process began. 12 Q. Okay. Was that a one-time PowerPoint 13 presentation? 14 A. It was. 15 Q. Okay. Do you know to whom did you do that? 16 A. It was the State Agencies House and Senate 17 Committees. 18 Q. And do you know when that was? 19 A. I don't recall the date. I know it was, I 20 believe, early August of 2021, but I don't recall the 21 date. 22 Q. Did you work on that PowerPoint with anyone 23 else? 24 A. I primarily created it. Matthew Miller reviewed 25 and offered comments. And I don't know if Marty</p> <p>Page 38</p>

<p>Page 39</p> <p>1 Garrity may have reviewed it at the end.</p> <p>2 Q. In addition to Matthew Miller, is Garrity also</p> <p>3 an attorney?</p> <p>4 A. Yes, she is. She's the director of the BLR.</p> <p>5 Q. Did you attend any trainings here in Arkansas to</p> <p>6 prepare for redistricting?</p> <p>7 A. There was one by Shelby Johnson at the Office of</p> <p>8 Geographic Information Systems.</p> <p>9 Q. Do you remember participating in any trainings</p> <p>10 by anyone at Citygate?</p> <p>11 A. I believe there was a technical training, but --</p> <p>12 I know I reviewed some of the documents that Lori</p> <p>13 Bowen had. I can't remember if I actually attended</p> <p>14 the online version of that or if I just reviewed the</p> <p>15 documents after.</p> <p>16 Q. Do you remember a Citygate training being</p> <p>17 recorded and you thereafter watching that recording?</p> <p>18 A. I cannot remember if it was -- if I watched live</p> <p>19 or if I watched a recording.</p> <p>20 Q. But do you -- do you recall watching a training</p> <p>21 by Citygate?</p> <p>22 A. I do recall -- I cannot remember if it was a</p> <p>23 full training or if it was just a module on the usage,</p> <p>24 but I know I looked at documents and -- training</p> <p>25 documents, but I cannot recall if there was an</p>	<p>Page 41</p> <p>1 redistricting?</p> <p>2 A. I would be the attorney that attended each</p> <p>3 meeting, but I didn't work directly for, I would say,</p> <p>4 the House or Senate. I worked for the members. So</p> <p>5 I'm the attorney present that the members may approach</p> <p>6 for a bill that relates to something in that</p> <p>7 committee, or for a research question for something</p> <p>8 that's raised in that committee. May be trying to</p> <p>9 split hairs, but that's the way we approached each one</p> <p>10 of our committee assignments.</p> <p>11 Q. And you've mentioned that you would have</p> <p>12 attended each meeting. So any meeting that either the</p> <p>13 House or the Senate committees have on congressional</p> <p>14 redistricting, you would have been in attendance in</p> <p>15 person?</p> <p>16 A. Only if we were not in session. So we attend</p> <p>17 the meetings when we are not in legislative session.</p> <p>18 If we are in legislative session, we're generally too</p> <p>19 busy drafting bills to attend the meetings. So we do</p> <p>20 not attend during session. So if there's a called</p> <p>21 session, we're not in the committee rooms.</p> <p>22 Q. Would you subsequently watch any of the</p> <p>23 recordings of any of the meetings related to</p> <p>24 congressional redistricting if you could not be there</p> <p>25 in person?</p>
<p>Page 40</p> <p>1 in-person -- or virtual training. I know it wasn't in</p> <p>2 person, but I can't remember.</p> <p>3 Q. And do you recall whether someone named Fred</p> <p>4 Hejazi --</p> <p>5 A. I know he was a contact for us with Citygate,</p> <p>6 but I cannot -- I cannot recall specifically if he was</p> <p>7 the one who did the training or not.</p> <p>8 Q. Okay. Now, you mentioned drafting for the State</p> <p>9 Agencies committee?</p> <p>10 A. That's correct.</p> <p>11 Q. What is that committee?</p> <p>12 A. The Arkansas legislature has designated</p> <p>13 committees within its structure. The membership</p> <p>14 chooses their own participation through a process in</p> <p>15 that, and the Bureau has, I guess, divided each of the</p> <p>16 drafting attorneys into areas of primary</p> <p>17 responsibility and that encompasses serving as the</p> <p>18 committee attorney for each one of the committees that</p> <p>19 are established by the legislature.</p> <p>20 And I happened to serve as the staff</p> <p>21 attorney for the State Agencies committee, for both</p> <p>22 House and Senate.</p> <p>23 Q. And that means that you would consider -- is it</p> <p>24 fair to say you considered yourself the attorney for</p> <p>25 the House and Senate committees on congressional</p>	<p>Page 42</p> <p>1 A. Sometimes. It depended on how much work was</p> <p>2 going on at the time, if it was during session.</p> <p>3 Q. And what was -- what would be the point of</p> <p>4 watching the meetings subsequent to them, for purposes</p> <p>5 of congressional redistricting?</p> <p>6 A. If an amendment had been made on the floor of</p> <p>7 the committee meeting, I would need to know to prepare</p> <p>8 that if it had not already been transmitted to me to</p> <p>9 prepare an amendment.</p> <p>10 Q. By a legislator?</p> <p>11 A. By a legislator.</p> <p>12 Q. Did you receive any documents identifying what</p> <p>13 your responsibilities would be for congressional</p> <p>14 redistricting this cycle?</p> <p>15 A. Not that I can recall, other than our standard</p> <p>16 sheet that showed who was responsible for what areas,</p> <p>17 but I don't think it specifically called out</p> <p>18 redistricting.</p> <p>19 So I had a sheet that said Michelle</p> <p>20 Davenport, State Agencies, and then backup would be --</p> <p>21 I can't even remember who my backup was at that point.</p> <p>22 It might have been Matthew at some points.</p> <p>23 Q. Who did you consult with when you had questions</p> <p>24 about your congressional redistricting</p> <p>25 responsibilities?</p>

<p>Page 43</p> <p>1 A. Matthew Miller or Joi Leonard.</p> <p>2 Q. So you've mentioned Mr. Miller, Mr. Leonard,</p> <p>3 Ms. Garrity. Were there any other people within BLR</p> <p>4 that you worked with on congressional redistricting?</p> <p>5 A. Lori Bowen in our research division.</p> <p>6 Q. And how did you work with her?</p> <p>7 A. She was assigned the task of also being a map</p> <p>8 drawer, and I don't -- that's not a technical term.</p> <p>9 That's just kind of how we divided the information.</p> <p>10 And so we discussed the program and how we would</p> <p>11 proceed with drawing the actual maps.</p> <p>12 Q. And you would discuss that with her in person as</p> <p>13 well as over email?</p> <p>14 A. Generally, yes.</p> <p>15 Q. Okay. As well as over phone?</p> <p>16 A. Occasionally, yes.</p> <p>17 Q. And besides Ms. Bowen and yourself, would you</p> <p>18 have considered anyone else to have drawn</p> <p>19 congressional maps within BLR?</p> <p>20 A. Not to my knowledge.</p> <p>21 Q. So it was two people within BLR who drew</p> <p>22 congressional maps this cycle?</p> <p>23 A. That's my understanding.</p> <p>24 Q. Did you have any involvement in the preparation</p> <p>25 of the census data for Arkansas?</p>	<p>Page 45</p> <p>1 A. I may have shared one with Lori Bowen to see if</p> <p>2 we were coming up with the same -- making sure the</p> <p>3 data worked correctly and that I was doing it</p> <p>4 correctly, but other than that I can't believe so.</p> <p>5 Maybe Matthew Miller, showing him what it looked like</p> <p>6 as I was learning through the process. But those</p> <p>7 would be the only people.</p> <p>8 Q. Did you ever draw any maps using those two data</p> <p>9 points, the 2011 census data and the American</p> <p>10 Community Survey data from 2019 and share those maps</p> <p>11 with any legislators?</p> <p>12 A. No.</p> <p>13 Q. Why not?</p> <p>14 A. I viewed them as my practice data, and I was</p> <p>15 making decisions on where those lines go, and I would</p> <p>16 not -- that was not a re- -- something I would share</p> <p>17 back with a legislator, my own personal training</p> <p>18 product.</p> <p>19 Q. Can you tell me a little bit more about how, if</p> <p>20 at all, you familiarized yourself with the map drawing</p> <p>21 software before you got the 2020 official census</p> <p>22 results?</p> <p>23 A. Again, I looked through some of the technical</p> <p>24 manuals for autoBound. I am a -- more of a hands-on</p> <p>25 learner, so even -- I watched, at some point -- again,</p>
<p>Page 44</p> <p>1 A. No, I did not.</p> <p>2 Q. Did you draw any maps before the official census</p> <p>3 data was available to you?</p> <p>4 A. I did.</p> <p>5 Q. Why?</p> <p>6 A. To practice using the software.</p> <p>7 Q. Okay. And what software are you referring to?</p> <p>8 A. The autoBound.</p> <p>9 Q. EDGE, is that the name?</p> <p>10 A. I believe it was -- EDGE was the name of it. I</p> <p>11 knew autoBound was the maker. But it was the GIS</p> <p>12 software that we had available for map drawing.</p> <p>13 Q. And do you know what data was available to you</p> <p>14 before the official census results on autoBoundEDGE as</p> <p>15 you were practicing congressional mapmaking?</p> <p>16 A. I did. I had the 2011 census data and then I</p> <p>17 had the 2019 -- I believe it was the American</p> <p>18 Community Report, or something of that nature, but it</p> <p>19 was a file that was used by the U.S. Census Bureau as</p> <p>20 a presnapshot to the census.</p> <p>21 Q. And you drew maps, practice maps, using those</p> <p>22 two datasets?</p> <p>23 A. That's correct.</p> <p>24 Q. Did you ever share any maps that you were</p> <p>25 practicing with other BLR staff?</p>	<p>Page 46</p> <p>1 I don't remember if it was a live video or if it was a</p> <p>2 recorded video, I remember seeing that -- it did not</p> <p>3 really make a lot of sense to me, so I just sat down</p> <p>4 at the computer and started clicking buttons to try to</p> <p>5 figure out the best way that I could use the software</p> <p>6 and ensure that it was producing a map that would be</p> <p>7 visual, that the colors actually printed correctly on</p> <p>8 our printer, things like that.</p> <p>9 Q. And so in addition to doing your own practicing</p> <p>10 and then attending the Citygate training, whether live</p> <p>11 or subsequent to it, did you do any other training</p> <p>12 around the autoBound software?</p> <p>13 A. No other training.</p> <p>14 Q. Did you participate in any one-on-one question</p> <p>15 sessions with anyone from Citygate as you were working</p> <p>16 on the autoBound program?</p> <p>17 A. Not that I recall.</p> <p>18 Q. Would you consider yourself to have technical</p> <p>19 expertise in map drawing?</p> <p>20 A. Not technical expertise. I was adequate in</p> <p>21 using the software.</p> <p>22 Q. Based upon the training you did yourself and the</p> <p>23 training you were exposed to either through NCLS and</p> <p>24 here in Arkansas with Citygate, for example?</p> <p>25 A. That's correct.</p>

<p>Page 47</p> <p>1 Q. Did you do any trainings with the geographic --</p> <p>2 GIS?</p> <p>3 A. No. We reached out to them with some questions</p> <p>4 when I started receiving error reports, but no</p> <p>5 training with them.</p> <p>6 Q. And who was your contact there?</p> <p>7 A. Shelby Johnson primarily. There may have been</p> <p>8 someone else in his office that I was routed to when I</p> <p>9 had a technical question, but I don't recall their</p> <p>10 name.</p> <p>11 Q. Okay. Before 20 -- learning in late 2020 that</p> <p>12 you were going to be engaged in the congressional</p> <p>13 redistricting cycle, did you have any other</p> <p>14 experience -- what other experience would you consider</p> <p>15 having with redistricting prior to that time?</p> <p>16 A. None. General knowledge of the process from law</p> <p>17 school and probably college, but no actual experience</p> <p>18 with redistricting.</p> <p>19 Q. In law school did you take any election law or</p> <p>20 voting rights-related classes?</p> <p>21 A. Took constitutional law. I took legislative</p> <p>22 drafting. I don't believe I took any other classes</p> <p>23 relating to voting.</p> <p>24 Q. Or that bear upon redistricting?</p> <p>25 A. Not that I can recall.</p>	<p>Page 49</p> <p>1 Q. So it's fair to say that you were drawing</p> <p>2 congressional maps primarily for legislative members?</p> <p>3 MR. TALLEY: Object to form.</p> <p>4 A. That's correct.</p> <p>5 Q. There wasn't -- I guess what I'm trying to</p> <p>6 understand is there wasn't, like, a BLR proposed</p> <p>7 congressional map that you worked on?</p> <p>8 A. Absolutely not.</p> <p>9 Q. Do you know approximately how many maps you drew</p> <p>10 for legislative members?</p> <p>11 A. I could not answer at all. I have no idea.</p> <p>12 Q. Did you draw members for -- draw maps for</p> <p>13 members of both parties for congressional maps?</p> <p>14 A. Absolutely.</p> <p>15 Q. Would you have drawn maps for legislative</p> <p>16 members on your own, or would you have always drawn</p> <p>17 maps in consultation with someone else?</p> <p>18 A. Always in consultation with a legislator.</p> <p>19 Q. Always in consultation with another member of</p> <p>20 the BLR staff?</p> <p>21 A. No, not BLR staff. Always in consultation with</p> <p>22 another -- with a legislative member.</p> <p>23 Q. So there would be some times where you would do</p> <p>24 maps with BLR staff and a legislative member, and</p> <p>25 sometimes you would do maps just with a legislative</p>
<p>Page 48</p> <p>1 Q. Okay. So it's fair to say that you drew</p> <p>2 congressional maps for the post -- for the post-2020</p> <p>3 redistricting cycle after receiving the official</p> <p>4 census results?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. And do you recall about when you received</p> <p>7 the official census results?</p> <p>8 A. It was mid- to late August.</p> <p>9 Q. Of what year?</p> <p>10 A. Of 2021.</p> <p>11 Q. And when would you have started drawing</p> <p>12 congressional maps using the official census results?</p> <p>13 A. After we had received it loaded. I don't recall</p> <p>14 when, specifically, after that I would have began</p> <p>15 drawing them.</p> <p>16 Q. Did you draw congressional maps for or with</p> <p>17 other BLR staff using the official census results?</p> <p>18 MR. TALLEY: Object to form.</p> <p>19 Go ahead.</p> <p>20 A. Ms. Bowen and I may have worked together on maps</p> <p>21 at different points. I can't -- there would have been</p> <p>22 no one else, but she and I may have at one point</p> <p>23 worked together on a map.</p> <p>24 Q. A map, or do you think multiple maps?</p> <p>25 A. I truly cannot remember.</p>	<p>Page 50</p> <p>1 member or members?</p> <p>2 MR. TALLEY: Object. Form.</p> <p>3 A. Always there's going to be a member involved.</p> <p>4 If Ms. Bowen was there to hear the request at the same</p> <p>5 time, we might have been in the same room working on</p> <p>6 the same map, but it was always at the direction of a</p> <p>7 member.</p> <p>8 Q. And would you work on a map with more than one</p> <p>9 legislator at a time, on the same map?</p> <p>10 A. Yes, there were those situations.</p> <p>11 Q. Did you ever draw congressional maps for</p> <p>12 nonlegislative members and non-BLR staff?</p> <p>13 A. Not to my knowledge.</p> <p>14 Q. Do you remember drawing maps for any lobbyist</p> <p>15 in -- any lobbyist?</p> <p>16 Do you recall drawing any congressional</p> <p>17 maps for any lobbyist?</p> <p>18 A. No.</p> <p>19 Q. Do you recall drawing maps for any</p> <p>20 nonlegislative third parties involved in congressional</p> <p>21 redistricting?</p> <p>22 A. Not to my knowledge. Everything I drafted was</p> <p>23 at the request of a legislator.</p> <p>24 Q. What did you do after you drew a map?</p> <p>25 What would you do with a map after you</p>

<p>1 drew it? Would you save it somewhere in particular?</p> <p>2 A. It depends on the request of the legislator.</p> <p>3 Q. Would you share that map with other BLR staff</p> <p>4 before you would send it to a legislator?</p> <p>5 A. Again, it would depend upon the request of the</p> <p>6 legislator, but generally, no.</p> <p>7 Q. So you would work on a map and then send it to a</p> <p>8 legislator, or legislators?</p> <p>9 A. That was one of the ways that that process</p> <p>10 worked, yes.</p> <p>11 Q. And would you convey maps that you worked on to</p> <p>12 legislators through what forms?</p> <p>13 A. Email. A lot of them were printed directly from</p> <p>14 the screen, a screenshot print of a map. It depended</p> <p>15 on how the legislator requested that information be</p> <p>16 transmitted to them.</p> <p>17 Q. Where did you work on drawing congressional</p> <p>18 maps?</p> <p>19 A. We had a spare office in BLR that was not being</p> <p>20 used by an attorney at the time and so we had a</p> <p>21 dedicated desktop computer there that had the</p> <p>22 autoBound software loaded on it, and I would meet with</p> <p>23 members in that office.</p> <p>24 Q. Is that the legal room?</p> <p>25 A. Again, we have a legal -- large legal office,</p>	<p>Page 51</p> <p>1 Q. Was there a dedicated time that you would be in</p> <p>2 the legal room that legislators would know to come and</p> <p>3 meet you there?</p> <p>4 A. They knew I was available at all times during</p> <p>5 the workday, and to stop by my regular office, which</p> <p>6 was just across the -- across. It was simply I would</p> <p>7 walk into a different office.</p> <p>8 Q. And how would they know that?</p> <p>9 A. We're always available, if we're at work, for</p> <p>10 drop-in requests.</p> <p>11 Q. What -- is there -- are you aware of any, like,</p> <p>12 sign-in sheet or any documentation of who from the</p> <p>13 General Assembly visited you in that legal room?</p> <p>14 A. No, ma'am. We didn't have any kind of sign-in</p> <p>15 sheet or anything of that nature.</p> <p>16 Q. Would the maps that you work on indicate who you</p> <p>17 might have been working on the map with that are</p> <p>18 stored anywhere?</p> <p>19 A. I believe when I saved the file name, I would</p> <p>20 include a member's name if -- if the map was saved.</p> <p>21 If they asked for it to be saved.</p> <p>22 Q. Okay. Outside of the legal room, did you work</p> <p>23 on drawing congressional maps anywhere else?</p> <p>24 A. No.</p> <p>25 Q. And outside of the desktop in the legal room,</p>
<p>Page 52</p> <p>1 and it was one of the -- like, it's not a cubicle, but</p> <p>2 it's an office with a door within our legal division</p> <p>3 that was not being used by another attorney.</p> <p>4 Q. Have you heard of something referred to as a</p> <p>5 "map room"?</p> <p>6 A. Yes. And occasionally -- that was primarily the</p> <p>7 computer that Lori Bowen drafted.</p> <p>8 Q. So you don't recall drafting maps on the -- in</p> <p>9 the map room?</p> <p>10 A. I may have been present or worked on one or two,</p> <p>11 but typically I was in the legal division office.</p> <p>12 Q. And there was one desktop and one screen there?</p> <p>13 A. That's correct.</p> <p>14 Q. And you mentioned that you would work with</p> <p>15 legislators sometimes in the legal room?</p> <p>16 A. That's correct.</p> <p>17 Q. How would they have access to that room?</p> <p>18 A. They would stop by, request an appointment, and</p> <p>19 we would meet in that office.</p> <p>20 Q. Would you calendar your meetings with any</p> <p>21 particular legislators that you had in that room?</p> <p>22 A. If I knew ahead of time. Often it would be a</p> <p>23 drop-in visit and so I would not have calendared that.</p> <p>24 If a specific member had requested an appointment,</p> <p>25 then it would go in my calendar.</p>	<p>Page 54</p> <p>1 did you have access to software on any other computers</p> <p>2 where you worked on congressional map drawing?</p> <p>3 A. We started out having them on our laptops, but I</p> <p>4 could never get it to even open correctly on my laptop</p> <p>5 and so I asked for it to be removed and to only -- it</p> <p>6 functioned on the desktop correctly, so I never even</p> <p>7 tried to access it on my laptop again.</p> <p>8 Q. Okay. Let me show you -- I'll just keep going.</p> <p>9 Did you have any role in drawing</p> <p>10 congressional maps following the 2010 census?</p> <p>11 A. I did not.</p> <p>12 Q. As a member of the public, did you have any role</p> <p>13 in the congressional map for 2011?</p> <p>14 A. I did not.</p> <p>15 Q. Were there any BLR rules that guided your</p> <p>16 interactions with legislators in drawing congressional</p> <p>17 maps?</p> <p>18 A. Nothing other than our standard rules concerning</p> <p>19 confidentiality of member requests and our general</p> <p>20 policies of how we worked with the members. No, there</p> <p>21 wasn't anything specific to redistricting.</p> <p>22 Q. And can you explain to me what you meant -- what</p> <p>23 you mean by your standard confidentiality policies</p> <p>24 beyond anything that you might have already shared</p> <p>25 with me?</p>

<p>Page 55</p> <p>1 A. We shared everything. We treated each member 2 request as a independent request by that member, and 3 it was confidential to anyone except that member and 4 whoever that member designated to have access to that 5 information.</p> <p>6 So we handled each request for every 7 bill drafter thing as a completely confidential 8 request by that member.</p> <p>9 Q. Whether dealing with congressional mapping or -- 10 A. That's correct.</p> <p>11 Q. -- any other piece of legislation? 12 A. All pieces of legislation are handled that way.</p> <p>13 Q. And if you drew a piece -- a map or any 14 legislation, you -- was it your understanding that you 15 could not share it with anybody else, even a leading 16 member of the legislature, without the permission of 17 the --</p> <p>18 A. That is --</p> <p>19 Q. -- drafting legislator? 20 A. That is correct.</p> <p>21 Q. And you talked about general rules around member 22 requests. Is there anything specific that you're 23 referring to? 24 A. General rules as -- things such as we would try 25 to respond to a request by email within 24 hours. We</p>	<p>Page 57</p> <p>1 Q. And why were you running under a tight deadline? 2 A. Because we were meeting in a special legislative 3 session, and it was -- not special, but it was a 4 resumed session from our previous encounter, and 5 everyone knew that they wanted to move quickly through 6 those time frames.</p> <p>7 And we also had, prior to that, two 8 weeks scheduled of legislative meetings. So 9 oftentimes if a member wanted to be able to present 10 something the next day, I needed to be able to have it 11 ready for them. So we just work late during that 12 time. It was a sprint at that point.</p> <p>13 Q. What was your understanding of the timeline that 14 was required to finalize a congressional map for 15 enactment? 16 When did -- when did the process begin 17 and when was it supposed to end? 18 A. That was a decision made by the committee 19 chairs. I knew they wanted to have meetings prior to 20 the session because I had been tasked with attending 21 committee meetings prior to the session being enacted, 22 and then I don't -- to my knowledge, I don't believe 23 there was a specific timeline given during that time.</p> <p>24 Q. Just that every -- you were working at their 25 request and as quickly as possible?</p>
<p>Page 56</p> <p>1 want to be very responsive to the members. If it's -- 2 if they provide you a timeline that they need a 3 request to be performed in, you let them know if you 4 need additional time for research, those kinds of 5 general, I would say, policy rules that the way we 6 wanted to interact with the members was to provide the 7 service in the best way we could and give them clear 8 understanding of how long something would take to get 9 back to them. I would say that's one of our leading 10 things that we tried to work towards.</p> <p>11 Q. How long would you convey to legislators that it 12 would take you to prepare a congressional map at their 13 request? 14 A. Our original statements during the committee 15 meeting is that it -- we anticipated it taking three 16 days from beginning of a map to the completion of a 17 bill that would be ready for filing.</p> <p>18 Q. Meaning the text -- including the text? 19 A. Including all of the text and it being in a 20 format that could be filed.</p> <p>21 Q. Now, you said -- you originally said that. What 22 happened in practice? 23 A. In practice, we were running under a much 24 tighter deadline, and we were just moving as fast as 25 we possibly could.</p>	<p>Page 58</p> <p>1 A. Absolutely.</p> <p>2 Q. So just to be clear, before the session taking 3 up redistricting, there were meetings of the 4 legislature in advance of that official session? Is 5 that what I'm understanding? 6 A. That's correct. The State Agencies committee 7 met prior to the official session beginning.</p> <p>8 Q. And you were advising any of the legislative 9 members during that time, as well, in preparation for 10 the session? 11 A. That's correct. All 135 members.</p> <p>12 Q. Were you drawing congressional maps for any of 13 the members in that time prior to the session 14 officially opening? 15 A. Yes.</p> <p>16 Q. And do you recall what data you were using in 17 that time prior to the session officially starting? 18 A. The 2020 census data.</p> <p>19 Q. The official data? 20 A. The official data.</p> <p>21 Q. Okay. And then once the session began and 22 legislators were deliberating over congressional maps, 23 you were then responding to their requests during the 24 session? 25 A. That's correct.</p>

<p>Page 59</p> <p>1 Q. Were you ever provided a legal hold or 2 litigation hold letter to preserve all documents you 3 created or sent during the congressional redistricting 4 cycle? 5 A. I cannot recall if we received one in the state 6 litigation. I do not remember. 7 Q. But you do not recall one -- receiving one in 8 the context of this specific litigation? 9 A. I was not employed at the Bureau at the time, I 10 believe, that this was initiated. But I don't -- I 11 don't even honestly know when it was filed, so I guess 12 I shouldn't say that, but... 13 Q. I'll represent that it was filed in 2021, but 14 let me not represent that now that I'm looking at you 15 and being like, where did the -- the time has gotten 16 out of my head. 17 Let me ask you: Did you -- in the 18 context of this specific litigation, do you recall 19 collecting any documents to share with any counsel in 20 this case? 21 A. Yes. 22 Q. Do you recall when you did that? 23 A. It would have been in response, actually, to an 24 Arkansas Freedom of Information Act request, and I 25 believe that was in 2021 or 2022. I do not recall the</p>	<p>Page 61</p> <p>1 A. I'm sure I would have used "redistricting." 2 Probably -- again, I don't believe it was searching 3 for documents for this case. What I recall searching 4 for was the Freedom of Information Act request. I 5 want to clarify that. 6 Q. Okay. 7 A. So under that situation, I would have been 8 looking for Ms. Bowen's name, Matthew's name with 9 regard to redistricting, and redistricting. 10 Q. And doing the same in any hard copy files as 11 well? 12 A. Absolutely. 13 Q. Okay. Did you have any assistance when you were 14 doing those collections? 15 A. No. 16 Q. Do you know whether you withheld any documents 17 that you collected as part of the FOIA process? 18 A. No. I submitted everything to Matthew Miller. 19 Our assistant director was taking care of reviewing 20 the documents and determining if they were subject to 21 the FOIA or not. 22 Q. And that was a one-time collection, or have 23 there been any other collections? 24 A. I left everything in the same place because I 25 figured it was all together, and so I never broke it</p>
<p>Page 60</p> <p>1 timing. I just know that everything was gathered for 2 that purpose. 3 Q. And at that time you had access to your BLR 4 files? 5 A. That's correct. 6 Q. Okay. And just to be clear, you -- you 7 mentioned reading cases, and you've mentioned working 8 on the laptop in the legal room. So is it fair to say 9 that you have electronic records of your work in 10 redistricting and hard copy records of your work in 11 redistrict -- in congressional redistricting? 12 A. Yes. I would say not everything I had was in 13 either place. I may have read a case on Westlaw and 14 not printed it -- or not Westlaw. We used LEXIS. 15 Q. Did you take handwritten sort of personal notes 16 as you were reading cases or working on maps? 17 A. It depends. I don't recall specifically at what 18 point I'd jot things and then throw it away if it's 19 something I'm just -- a color here or something of 20 that nature. But I don't recall if I had a lot of 21 handwritten notes on any of these issues. I'm sure 22 there are some, I just do not recall. 23 Q. When you were collecting documents in 24 preparation for this case, did you use any specific 25 search terms?</p>	<p>Page 62</p> <p>1 back down. So, no, as far as I know, that was a 2 one-time collection for me. 3 Q. And for the FOIA request -- 4 A. Yes. 5 Q. -- in response to the FOIA request? 6 Did you create any training materials 7 for legislators or other BLR staff related to 8 congressional redistricting? 9 A. I'm going to ask you to rephrase. 10 I did create a PowerPoint, but I don't 11 know if you consider that training materials or not. 12 Q. What do you consider that PowerPoint? 13 A. It was a presentation for the committee. 14 Q. Okay. And you mentioned that was the only 15 presentation that you made to the committee? 16 A. That's correct. 17 Q. And you mentioned that you primarily worked on 18 it, but you may have gotten some feedback from Miller 19 or Garrity? 20 A. That's correct. 21 Q. Is that fair? 22 A. That's correct. 23 Q. And outside of that presentation, do you recall 24 creating any other presentations for members of the 25 legislature or other BLR staff related to</p>

<div>1 congressional redistricting?</div> <div>2 A. There were no other presentations created.</div> <div>3 Q. And do you know whether or not you collected</div> <div>4 that PowerPoint for purposes of responding to the FOIA</div> <div>5 request?</div> <div>6 A. I do not recall specifically, as it was an open</div> <div>7 public document that is available on the website at</div> <div>8 any time we post a committee meeting. So I don't know</div> <div>9 if I would have pulled it separately for that or not.</div> <div>10 Q. And by "the website," what are you referring to?</div> <div>11 A. The Bureau of Legislative Research maintains the</div> <div>12 website for the Arkansas legislature, and all</div> <div>13 committee meetings are online and available to be</div> <div>14 watched and are archived. So you can go back and</div> <div>15 watch any committee meeting, and any exhibits</div> <div>16 introduced or used during that committee meeting are</div> <div>17 also uploaded to the website at the conclusion of the</div> <div>18 committee meeting.</div> <div>19 Q. Are the choices about what goes on that website</div> <div>20 purely BLR's choices, or do you receive any</div> <div>21 instruction from the legislature about what to make</div> <div>22 available on that website?</div> <div>23 A. It's -- again, I don't know exactly how research</div> <div>24 handles that.</div> <div>25 Q. Okay.</div>	<div>Page 63</div>	<div>1 was a report you could run. Those are the only ones</div> <div>2 that come to mind. I know that there were others, but</div> <div>3 I don't recall.</div> <div>4 Q. And were those pro forma reports that you would</div> <div>5 prepare for each map you were working on, or something</div> <div>6 else?</div> <div>7 A. Something else. It would be a request by a</div> <div>8 member.</div> <div>9 Q. So if a specific member received one of those</div> <div>10 reports, it would not be the case that all the other</div> <div>11 members of the legislature would necessarily receive</div> <div>12 that same report; is that fair to say?</div> <div>13 A. That's correct. All upon the request of the</div> <div>14 legislator, what they wished.</div> <div>15 Q. And if they decided to share it, they -- you</div> <div>16 would either need to be told to share with everyone,</div> <div>17 or they themselves would have to share it with other</div> <div>18 members?</div> <div>19 A. That's correct.</div> <div>20 Q. Now, you mentioned these reports. Where did you</div> <div>21 derive these reports from?</div> <div>22 A. There was a button on the autoBound software</div> <div>23 that said "Reports," and you could run the report data</div> <div>24 from the autoBound census data.</div> <div>25 Q. Okay. And you've mentioned "population</div>	<div>Page 65</div>
<div>1 A. My understanding is that if it's introduced at</div> <div>2 the committee meeting as an exhibit, it's put on the</div> <div>3 website.</div> <div>4 MR. TALLEY: And I'll represent that we</div> <div>5 pulled those materials and produced them in</div> <div>6 this litigation.</div> <div>7 (BY MS. ADEN:)</div> <div>8 Q. Did you create any binders of materials for</div> <div>9 legislators with, for example, maps during the</div> <div>10 congressional map drawing process?</div> <div>11 A. Not that I recall.</div> <div>12 Q. Do you recall creating any reports for</div> <div>13 legislators or other BLR staff regarding congressional</div> <div>14 redistricting maps?</div> <div>15 A. Yes.</div> <div>16 Q. What type of reports?</div> <div>17 A. Depends on the request of the legislator.</div> <div>18 Q. Could you give me an example, generically?</div> <div>19 A. There were reports, I believe, on population</div> <div>20 variance. There was reports on racial demographics.</div> <div>21 There was reports -- I'm trying to think of some of</div> <div>22 the other. Geographic continuity, I believe, was a</div> <div>23 report that was available. I know there was a report</div> <div>24 that compared previous congressional districts, I</div> <div>25 believe. So the 2011 congressional demographic data</div>	<div>Page 64</div>	<div>1 variance." What do you mean by that?</div> <div>2 A. There was a way to look at what the ideal</div> <div>3 number -- if you split all of the population of</div> <div>4 Arkansas into four congressional districts, what that</div> <div>5 number -- ideal number was is how it was characterized</div> <div>6 by the software, and the variance was how far off from</div> <div>7 that ideal number a district would be.</div> <div>8 Q. Was there any -- did you understand there to be</div> <div>9 any variance that was acceptable or not from dividing</div> <div>10 the population evenly among the four congressional</div> <div>11 districts?</div> <div>12 A. No. That was just information that was often</div> <div>13 requested.</div> <div>14 Q. You mentioned racial demographic reports. What</div> <div>15 did those entail?</div> <div>16 A. I don't recall exactly. I believe that there</div> <div>17 was a report that broke demographic data down by</div> <div>18 county. I do not recall if it went as far as the</div> <div>19 precinct level. I just don't remember.</div> <div>20 But there was a -- basically that was</div> <div>21 what it was titled. I believe it was racial</div> <div>22 demographic report, and it had information in it.</div> <div>23 Q. And so, for example, would you know if CD2 had</div> <div>24 particular counties in it, would you know the general</div> <div>25 racial breakdown of CD2, or would -- and/or would you</div>	<div>Page 66</div>

<p>Page 67</p> <p>1 also know the racial breakdown of the counties within 2 CD2?</p> <p>3 A. I cannot remember what that report entailed. I 4 can't remember how it was designed. I just remember 5 that there was one.</p> <p>6 Q. And you mentioned "contiguity." What does that 7 mean to you?</p> <p>8 A. That means is there a gap between the district 9 and are all the pieces touching of a district, or is 10 there an island of a part of Congressional District 1 11 that's located -- isolated within Congressional 12 District 2 that doesn't touch itself. So is 13 everything contiguous in the way that it has been 14 drawn.</p> <p>15 Q. And you mentioned that there was a feature that 16 allowed you to compare the 2011 map to what map you 17 were drawing. Is that what you were saying?</p> <p>18 A. I believe you could run the reports -- same 19 reports on 2011 and then versus whatever other subset 20 to have that information available.</p> <p>21 So I could still run the same report on 22 a 2011 map that I could run on a 2020 map.</p> <p>23 Q. So you could look, for example, at the racial 24 demographics in the 2011 map, and you would have that 25 available as you were considering the racial</p>	<p>Page 69</p> <p>1 guidelines/rules for engaging in congressional 2 redistricting or something else?</p> <p>3 A. Absolutely something else. We are very careful 4 to say that these are not policy decisions. This is a 5 general overview of the law, again, in a very general 6 sense. It is up to the legislative members on how 7 they want to choose to apply that. These are the ways 8 other states have addressed this.</p> <p>9 It was simply to provide a high-level 10 overview of the process. And I believe in our 11 statements at the beginning, we specifically state 12 this was no way to be a policy recommendation by BLR.</p> <p>13 Q. And outside of that presentation, are you aware 14 of legislators going to any other trainings on 15 congressional redistricting conducted by BLR or anyone 16 else?</p> <p>17 A. I do know some legislators attended other 18 trainings.</p> <p>19 Q. What type of other trainings?</p> <p>20 A. NCSL is available to all legislators, as well as 21 legislative staff.</p> <p>22 Q. Do -- did BLR make it available, or how do you 23 know it was available to all members?</p> <p>24 A. All members are a part of NCSL, I believe, 25 through their own as elected officials. NCSL is a</p>
<p>Page 68</p> <p>1 demographics of the map being drawn with the 20 -- 2 post-2020 data potentially?</p> <p>3 A. They were separate reports, but that information 4 was available in both formats.</p> <p>5 Q. Going back to the PowerPoint that you presented 6 on, where did you get the information that went into 7 the PowerPoint?</p> <p>8 A. It was heavily based on the information from 9 NCSL. The Red Book, again, is a very good general 10 overview hornbook of redistricting law in general, and 11 it formed the basis of a lot of the information that I 12 presented.</p> <p>13 I did read case law that would be 14 referenced in the Red Book as what was referred to, 15 just to see for my own understanding if that was 16 something that was well-settled law or if it was 17 something that was still in active litigation in other 18 areas. If there's, you know, cases that had not been 19 decided or if there was a split in the circuits.</p> <p>20 I used that information in a very -- for 21 my own information, but then also the generalized part 22 of it and from the Red Book in creating that 23 presentation.</p> <p>24 Q. And when you presented that information, do you 25 recall presenting it as these are BLR's</p>	<p>Page 70</p> <p>1 nonpartisan research group that -- my understanding is 2 that every legislative member has access to. The 3 Bureau has a separate -- we're also invited to be a 4 part of that resource, and do so.</p> <p>5 Q. But as the staff for the members of the General 6 Assembly related to congressional redistricting, the 7 presentation that you gave in 2021 was the sole 8 presentation that was given by BLR to members of the 9 legislature on congressional redistricting?</p> <p>10 A. Yes, that is correct.</p> <p>11 Q. Just to clarify, did you ever use your personal 12 email to do congressional -- do you have a personal 13 email?</p> <p>14 A. I do.</p> <p>15 Q. Okay. Do -- did you ever use your personal 16 email to share information about congressional 17 redistricting with anyone?</p> <p>18 A. No, I did not.</p> <p>19 Q. And do you have a work cell phone?</p> <p>20 A. I do not.</p> <p>21 Q. Did you have a work cell phone with BLR during 22 this time period?</p> <p>23 A. No, I did not.</p> <p>24 Q. Okay. So do you have a personal cell phone that 25 you used while working with BLR during the</p>

<p>Page 71</p> <p>1 congressional mapmaking period?</p> <p>2 A. I did.</p> <p>3 Q. Okay. And would you receive calls or make calls</p> <p>4 related to congressional redistricting on that</p> <p>5 personal cell phone?</p> <p>6 A. I would not.</p> <p>7 Q. What phone would you use then?</p> <p>8 A. I used both my office phone and the phone in</p> <p>9 that legal office room that we had the computer set up</p> <p>10 in.</p> <p>11 Q. Do you know if either of those phones keep a</p> <p>12 record of calls being made to and from it?</p> <p>13 A. I have no idea.</p> <p>14 Q. During your work on congressional maps following</p> <p>15 the 2020 census, did you speak to any members of the</p> <p>16 public about congressional mapmaking?</p> <p>17 A. Not that I recall. And I'll clarify that.</p> <p>18 Other than to say, maybe to my husband, that I was</p> <p>19 going to be responsible for drawing maps and would be</p> <p>20 spending late hours during that period of time, but</p> <p>21 no.</p> <p>22 Q. In working with legislators, not naming any</p> <p>23 specific legislator, but no specific legislator -- did</p> <p>24 any specific legislator ask you to communicate with a</p> <p>25 member of the public about congressional mapmaking?</p>	<p>Page 73</p> <p>1 A. I do not recall the name at all.</p> <p>2 Q. Did you speak with any U.S. Congressional</p> <p>3 members about congressional mapmaking?</p> <p>4 A. No.</p> <p>5 Q. Do you know if you spoke with any lobbyist about</p> <p>6 congressional mapmaking?</p> <p>7 A. I do not recall speaking to anyone, other than a</p> <p>8 member, about congressional mapmaking.</p> <p>9 Q. Do you recall working -- or strike that.</p> <p>10 Do you recall speaking with any outside</p> <p>11 consultants in order to enable you to engage in</p> <p>12 congressional redistricting beyond anyone that was at</p> <p>13 Citygate or anyone else?</p> <p>14 A. Not that I recall.</p> <p>15 Q. Do you recall speaking with anyone from the</p> <p>16 governor's office about congressional mapmaking?</p> <p>17 A. No.</p> <p>18 Q. Okay. Time check. How are you doing?</p> <p>19 A. I'm good.</p> <p>20 MR. TALLEY: We've been going about 80</p> <p>21 minutes.</p> <p>22 MR. BRASCHER: I have to use the</p> <p>23 restroom. Sorry.</p> <p>24 THE WITNESS: Okay.</p> <p>25 MS. ADEN: Do you mind if we take ten?</p>
<p>Page 72</p> <p>1 A. No.</p> <p>2 Q. Do you know if you spoke with anyone from the</p> <p>3 National Republican Redistricting Trust about</p> <p>4 congressional mapmaking?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you know if you spoke with anyone from the</p> <p>7 American Legislative Exchange Council about</p> <p>8 congressional mapmaking?</p> <p>9 A. I do not know.</p> <p>10 Q. Do you know if you spoke with anyone from Impact</p> <p>11 Management Group about congressional mapmaking?</p> <p>12 A. No.</p> <p>13 Q. Do you know who Richard Bearden is?</p> <p>14 A. The name is familiar, but I do not recall</p> <p>15 speaking with him.</p> <p>16 Q. About congressional redistricting?</p> <p>17 A. About congressional redistricting. There are</p> <p>18 some names that, through all the drafting that we do,</p> <p>19 we may hear at different points, and I can't even</p> <p>20 recall if I had any personal interaction with him or</p> <p>21 if it was just a name that I've heard.</p> <p>22 Q. And do you -- what do you associate with</p> <p>23 Mr. Bearden?</p> <p>24 A. I can't even put an association to it.</p> <p>25 Q. How about Terry Benham, B-e-n-h-a-m?</p>	<p>Page 74</p> <p>1 THE WITNESS: I'm good.</p> <p>2 (Recess from 10:19 a.m. to 10:33 a.m.)</p> <p>3 (BY MS. ADEN:)</p> <p>4 Q. I would like to turn now to a bit more</p> <p>5 discussion about the software and data you used, was</p> <p>6 available to you for congressional map drawing.</p> <p>7 We've talked about autoBoundEDGE. Is</p> <p>8 that the software that you solely used in order to</p> <p>9 develop congressional maps this cycle?</p> <p>10 A. That's correct.</p> <p>11 Q. And do you know who made the decision to use</p> <p>12 that program?</p> <p>13 A. My understanding is Arkansas Geographic</p> <p>14 Information Systems. The Bureau determined that they</p> <p>15 would follow whichever software GIS determined to use.</p> <p>16 Q. And is it fair to say that -- what was the</p> <p>17 relationship between Citygate and GIS, as far as you</p> <p>18 understood it?</p> <p>19 A. Just a contractual. I have no idea how they</p> <p>20 even went through their procurement.</p> <p>21 Q. Do you know if the autoBoundEDGE program was the</p> <p>22 same program used to draw the 2011 map, congressional</p> <p>23 map?</p> <p>24 A. I'm not sure. At one point I thought someone</p> <p>25 said that it was the same company, but I do not have</p>

<p>Page 75</p> <p>1 any idea.</p> <p>2 Q. Did you use data to accomplish your</p> <p>3 congressional redistricting obligations?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. What data did you use?</p> <p>6 A. The 2020 census data.</p> <p>7 Q. Anything else?</p> <p>8 A. To my knowledge, that encompassed all the</p> <p>9 information to draw the -- to draw the actual maps was</p> <p>10 based on the 2020 census data.</p> <p>11 Q. And what did you understand to be contained</p> <p>12 within the 2020 census data?</p> <p>13 A. There was a lot of information there. I do not</p> <p>14 recall all of it. I knew it had the population. I</p> <p>15 knew it had the geographic metes and bounds of those</p> <p>16 populations down to a -- not a precinct level, but a</p> <p>17 cell level.</p> <p>18 Q. Block level?</p> <p>19 A. Block level data. And I'm not sure what all</p> <p>20 that block level data encompassed. I know there was a</p> <p>21 stack about that deep when you printed out the census</p> <p>22 data.</p> <p>23 I originally printed it out and realized</p> <p>24 that it would not be terribly helpful for me to try to</p> <p>25 utilize it in that format.</p>	<p>Page 77</p> <p>1 fair representation of what political data could mean?</p> <p>2 A. Yes, that's what political data could mean. But</p> <p>3 I'm not familiar with what parts were in the census</p> <p>4 data or not.</p> <p>5 Q. And on the autoBound program that you used on</p> <p>6 the legal computer, did you have available to you any</p> <p>7 political data?</p> <p>8 A. No.</p> <p>9 Q. Did you use any political data in drawing</p> <p>10 congressional maps?</p> <p>11 A. I did not.</p> <p>12 Q. Were you instructed to use any political data in</p> <p>13 drawing congressional maps by anybody?</p> <p>14 MR. TALLEY: I'll allow the question</p> <p>15 generally and instruct you not to share</p> <p>16 anything specific related to any individual</p> <p>17 member or any individual piece of</p> <p>18 legislation.</p> <p>19 But as to the question as posed, just</p> <p>20 "yes" or "no" or "I don't know," you're free</p> <p>21 to answer.</p> <p>22 A. I don't know.</p> <p>23 Q. And why don't you know?</p> <p>24 A. I don't know what a member may have been using</p> <p>25 to give me those instructions as to which county to</p>
<p>Page 76</p> <p>1 Q. When -- in addition to total population numbers</p> <p>2 and boundary lines -- is that what I'm understanding</p> <p>3 for you?</p> <p>4 A. Yes.</p> <p>5 Q. -- for different geographies, did the census</p> <p>6 data also include racial population numbers?</p> <p>7 A. Yes.</p> <p>8 Q. Did -- do you know whether the census data</p> <p>9 included any political data as part of that?</p> <p>10 A. I don't recall if the census data did. I know</p> <p>11 we did not have access to that in autoBound.</p> <p>12 Q. And by "political data," what do you understand</p> <p>13 that to mean?</p> <p>14 A. Political party voting within different precinct</p> <p>15 levels.</p> <p>16 Q. So, for example, whether, within a precinct for</p> <p>17 a particular election, people voted for a candidate of</p> <p>18 one particular party or the other; is that fair to</p> <p>19 say?</p> <p>20 A. That's correct. That would be an accurate</p> <p>21 representation.</p> <p>22 Q. Okay. So, for example, one might have the</p> <p>23 breakdown of, in the 2020 presidential election, which</p> <p>24 voters in a particular precinct voted for the two main</p> <p>25 presidential candidates in that election. Is that a</p>	<p>Page 78</p> <p>1 put where or what precinct to put where.</p> <p>2 Q. So can you explain that to me a little bit more?</p> <p>3 Are you suggesting that a member could</p> <p>4 have used political data and given you an instruction</p> <p>5 and that was embedded in the instruction in the</p> <p>6 political performance?</p> <p>7 Or can you explain what you mean by</p> <p>8 that?</p> <p>9 A. It may have been. I was given information in a</p> <p>10 variety of formats, I don't know where that</p> <p>11 information originated. So I could not speak as to</p> <p>12 whether or not it contained political data in its</p> <p>13 compilation.</p> <p>14 Q. Can you describe some examples of the different</p> <p>15 formats that you were given information?</p> <p>16 A. I was given information verbally, I was given</p> <p>17 information visually from a map, I was given</p> <p>18 information by email that would request a map in a</p> <p>19 certain manner, but I don't know where the origin of</p> <p>20 that information came from.</p> <p>21 Q. And by "visually," are you -- is it fair to say</p> <p>22 that you would be -- you would have been given images</p> <p>23 of a congressional map or specific districts within a</p> <p>24 congressional map, or something, and that would be</p> <p>25 shared with you as a source of information?</p>

Page 79	Page 81
<p>1 A. That's correct.</p> <p>2 Q. And then is it fair to say that you received</p> <p>3 those sources of information and then you were</p> <p>4 instructed to do something with that information; is</p> <p>5 that fair to say?</p> <p>6 A. That's correct. Would be to input it into</p> <p>7 autoBound into our format that we had developed for</p> <p>8 that map.</p> <p>9 Q. Did you -- also, in addition to the census data</p> <p>10 that was available to you, did you have the addresses</p> <p>11 of the incumbent members of congress to use as you</p> <p>12 were preparing congressional maps?</p> <p>13 A. I believe that was available.</p> <p>14 Q. Do you believe that was available on</p> <p>15 autoBoundEDGE?</p> <p>16 A. Yes.</p> <p>17 Q. Are there any other -- well, let me ask you:</p> <p>18 Are there any other data points, besides the census</p> <p>19 data and the addresses of Congress -- of incumbent</p> <p>20 members, that you had available on autoBoundEDGE that</p> <p>21 you recall?</p> <p>22 A. We -- I don't recall. We may have had Arkansas</p> <p>23 House and Senate member information, but I do not</p> <p>24 recall if we had that.</p> <p>25 Q. And what do you mean "information"? Where they</p>	<p>1 but I can't recall which ones may have been available.</p> <p>2 They weren't necessary to move the lines of the</p> <p>3 counties as we were being requested on the maps. Or</p> <p>4 move the lines of the congressional districts, excuse</p> <p>5 me.</p> <p>6 Q. Was there additional data that you or someone</p> <p>7 else wanted but you didn't have access to in order to</p> <p>8 engage in congressional redraw?</p> <p>9 A. I don't recall a request for information that</p> <p>10 was made to me that I didn't have access to.</p> <p>11 Q. Now, regarding the race data that was available</p> <p>12 through the census, do you know at what level of</p> <p>13 detail it was available to you?</p> <p>14 A. I do not recall.</p> <p>15 Q. You mentioned earlier an awareness of block</p> <p>16 level data.</p> <p>17 A. That's correct.</p> <p>18 Q. What does that mean to you?</p> <p>19 A. That was the smallest unit of census data that</p> <p>20 can be determined and that block data, then, is</p> <p>21 compounded into what the current election precincts</p> <p>22 are. And that's the building block of the census</p> <p>23 data, and I know that certain things are tied to that</p> <p>24 block data. I just don't recall anymore.</p> <p>25 I used to know when I was looking at</p>
Page 80	Page 82
<p>1 lived?</p> <p>2 A. Where they lived.</p> <p>3 Q. Why would that have been relevant to drawing</p> <p>4 congressional maps?</p> <p>5 A. Because we were prepared to also provide copies</p> <p>6 of maps related to the Arkansas redistricting if a</p> <p>7 member requested it.</p> <p>8 Q. You mean the state House and Senate?</p> <p>9 A. The state House and state Senate.</p> <p>10 So I believe -- that why I say I believe</p> <p>11 it was all loaded at the same time, but I don't recall</p> <p>12 it being on the screen that I used for congressional.</p> <p>13 But I know we had that ability in looking at that.</p> <p>14 Q. So on the legal computer, there could be a host</p> <p>15 of data that was available to you both for</p> <p>16 congressional line drawing and the state legislative</p> <p>17 line drawing, and -- but you may not have used all of</p> <p>18 the data in preparing congressional maps?</p> <p>19 A. That is absolutely correct.</p> <p>20 Q. Okay. Were there data or data fields that you</p> <p>21 had available in autoBound that you did not use to</p> <p>22 accomplish your congressional redistricting</p> <p>23 obligations, besides potentially this Senate, House --</p> <p>24 Senate or House-related data?</p> <p>25 A. I'm sure there were other data fields available,</p>	<p>1 this tightly, but I don't recall now what all was tied</p> <p>2 to that block data.</p> <p>3 Q. Do you recall ever using block level racial data</p> <p>4 to develop congressional maps?</p> <p>5 A. No, I do not.</p> <p>6 Q. Were you instructed by anyone to not use block</p> <p>7 level racial data in order to develop congressional</p> <p>8 maps?</p> <p>9 MR. TALLEY: Again, I'll jump in and</p> <p>10 instruct the witness not to share any</p> <p>11 information on grounds of legislative</p> <p>12 privilege related to specific members,</p> <p>13 specific member requests, specific draft</p> <p>14 legislation, that sort of thing.</p> <p>15 I'm okay, like I was yesterday, with</p> <p>16 some of these questions being posed</p> <p>17 generally as to "yes" or "no" as to the</p> <p>18 entire process itself because I think that</p> <p>19 would allow you to assess various privilege</p> <p>20 claims.</p> <p>21 So I'll allow the witness to answer that</p> <p>22 question on the table "yes," "no," and "I</p> <p>23 don't know," but beyond that will -- will</p> <p>24 instruct you not to answer based on</p> <p>25 legislative privilege.</p>

Page 83										Page 85																													
1	A. No.																			1	available to you through the census data, loaded onto																		
2	Q. So who made the decision to not use race data at																			2	autoBoundEDGE?																		
3	the block level?																			3	A. That's my understanding, yes. To me, that's the																		
4	MR. TALLEY: Same objection; same																			4	only data point I knew had been loaded onto the																		
5	instruction.																			5	machine.																		
6	And to the extent that question calls																			6	Q. Have you heard of Dave's Redistricting software?																		
7	for some legislative communication, I'll																			7	A. I have.																		
8	instruct the witness not to answer.																			8	Q. What is it?																		
9	Otherwise, you're free to answer.																			9	A. My understanding was that it was an online																		
10	A. I don't know. I know that we did not have the																			10	redistricting map tool that allowed you to draw maps																		
11	capability in our bill drafts to identify block level																			11	using the 2020 census data.																		
12	census data in the legislation. We didn't have a																			12	Q. Did you ever go onto Dave's Redistricting and																		
13	metes and bounds description that would correspond																			13	develop any maps?																		
14	with how we drafted the current legislation. We had																			14	A. I did not.																		
15	precinct numbers that could be tied to in the																			15	Q. So how did you become aware of Dave's																		
16	legislation, but there was no metes and bounds																			16	Redistricting?																		
17	definition of block data to actually correspond, write																			17	A. I heard about it at the NCSL conference, that it																		
18	a bill.																			18	was a free resource that would be available, and																		
19	So I have no idea about the racial, but																			19	general knowledge from our --																		
20	I know that's one reason block level data wasn't used																			20	MR. TALLEY: I'll instruct you not to																		
21	in drawing lines is --																			21	share anything related to a legislative																		
22	Q. By --																			22	communication.																		
23	A. By myself. Because I could not translate that																			23	THE WITNESS: Thank you.																		
24	into a bill draft form.																			24	(BY MS. ADEN:)																		
25	Q. But for the same reason that you described																			25	Q. Did you ever visit Dave's Redistricting as a																		
Page 84										Page 86																													
1	earlier, you don't know one way or the other whether																			1	result of receiving information from any legislator?																		
2	any legislator may have used block level racial data																			2	A. I did not visit the site.																		
3	to draw maps that were shared with you to do anything																			3	Q. If a legislator used Dave's Redistricting to																		
4	with it?																			4	develop a map or information that was shared with you,																		
5	A. That's correct. I have no idea of the origin.																			5	you -- let me step back and -- strike that.																		
6	Again, I'm only speaking to the technical use of block																			6	Is it fair to say that you would receive																		
7	level data for myself in what I consider the drawing																			7	information from legislators and then try to implement																		
8	of the map being the actual inputting it into																			8	their guidance or instructions in the legal room on																		
9	autoBoundEDGE was done at a precinct level or above.																			9	autoBoundEDGE?																		
10	Q. And so just to be clear, you had racial census																			10	A. That is correct.																		
11	data at the precinct level when you were drawing																			11	Q. And so if a legislator was using Dave's																		
12	congressional maps?																			12	Redistricting and then coming to you with information																		
13	A. I believe it was available.																			13	from that website, is it fair to say that you would be																		
14	Q. Was having race data at the precinct, or any																			14	trying to reproduce what information they had obtained																		
15	other level, available to you helpful when you were																			15	potentially from Dave's Redistricting?																		
16	drawing congressional maps?																			16	MR. TALLEY: Again, I'll jump in. I'll																		
17	A. That wasn't something that I would be looking																			17	let the witness answer the hypothetical and																		
18	at. I'm strictly following the request of the member.																			18	instruct the witness not to share anything																		
19	Q. Do you know if autoBoundEDGE had the ability to																			19	specific -- related to a specific member																		
20	include political performance data, even if it -- you																			20	request, specific piece of draft																		
21	did not use it, do you know if it was available to be																			21	legislation, and the like.																		
22	used on autoBoundEDGE?																			22	Go ahead.																		
23	A. I do not know.																			23	A. That could very well be the case. I was																		
24	Q. Okay. And the racial data that you had																			24	receiving information and replicating that in																		
25	available to you, is it your position that it was only																			25	autoBound. I have no idea of where some of that																		

Page 87	Page 89
<p>1 information originated.</p> <p>2 Q. And you never asked questions about the origin</p> <p>3 of the information that you would have received from</p> <p>4 legislators?</p> <p>5 A. I did not.</p> <p>6 Q. Have you ever heard of districtr.org?</p> <p>7 A. No, I have not.</p> <p>8 Q. Okay. Were you aware of anyone on the BLR staff</p> <p>9 using Dave's Redistricting?</p> <p>10 A. Not that I know of.</p> <p>11 Q. Are you aware of anyone on BLR staff using</p> <p>12 districtr.org?</p> <p>13 A. Not that I know of.</p> <p>14 Q. Okay. I want to turn briefly to your process</p> <p>15 for developing congressional maps beyond what we've</p> <p>16 already started talking about.</p> <p>17 Did you have a uniform process for</p> <p>18 developing congressional maps?</p> <p>19 A. I would not say I had a uniform process. I had</p> <p>20 a general way that I would start a map and that would</p> <p>21 be that I had the 2011 congressional districts as a</p> <p>22 beginning point of the map, with the colors that we</p> <p>23 had designated for each district to make it more</p> <p>24 cohesive as people were looking at maps and knew which</p> <p>25 color represented what. And I would start at that</p>	<p>1 into a small area.</p> <p>2 Q. Below the precinct level?</p> <p>3 A. No, not below the precinct level. It only went</p> <p>4 to the precinct level.</p> <p>5 Q. So, for example, you're looking at the 2011 map,</p> <p>6 and generically -- let's look at the 2011 map.</p> <p>7 I would like to introduce as Exhibit 1</p> <p>8 what has been Bates-stamped as BLR-CMA-08775 through</p> <p>9 877. This is an email from Josh Bridges to Matthew</p> <p>10 Miller and Kenneth Bursleson. It's, frankly, a chain</p> <p>11 that says "Congressional map." I'm going to show it</p> <p>12 to you in a second.</p> <p>13 (Exhibit 1 marked for identification.)</p> <p>14 Q. Do you recognize these documents?</p> <p>15 A. I don't recognize specifically these emails. I</p> <p>16 was not part of this chain, but I do recognize the</p> <p>17 congressional map. And I may have been provided a</p> <p>18 copy of that at some point, but I don't recall it.</p> <p>19 Q. Okay. And this is -- the 877, the third page in</p> <p>20 this set of documents, is the 2011 Arkansas</p> <p>21 congressional enacted map, as far as you're aware?</p> <p>22 A. That is exact.</p> <p>23 Q. Okay.</p> <p>24 A. And what I did, for clarity, is when I was</p> <p>25 practicing on autoBound, I recreated the congressional</p>
Page 88	Page 90
<p>1 point and then the member would direct me where they</p> <p>2 wanted changes.</p> <p>3 Q. So on your screen in the legal room, you would</p> <p>4 have the 2011 boundaries loaded on your computer, and</p> <p>5 you would be looking at that; is that fair to say?</p> <p>6 A. That's correct.</p> <p>7 Q. And then members would give you information from</p> <p>8 which you would then make changes to the boundary</p> <p>9 lines for the 2011 map; is that fair to say?</p> <p>10 A. That's fair to say.</p> <p>11 Q. Okay. So was it -- is it fair to say that --</p> <p>12 okay. So strike that.</p> <p>13 So look -- in the generic sense, when</p> <p>14 you're looking at your legal screen and you have the</p> <p>15 2011 map pulled up, what else are you seeing on the</p> <p>16 screen looking at the 2011 map?</p> <p>17 A. To what I recall, there was the screen. There</p> <p>18 was a ticker at the bottom. I know it had population</p> <p>19 numbers when you selected an individual county, and I</p> <p>20 believe it had designations of population numbers by</p> <p>21 color-coded congressional district. I really don't</p> <p>22 remember what else was on there.</p> <p>23 It had the -- we had the screen names of</p> <p>24 each county on the screen, and you could zoom in to</p> <p>25 reach a precinct level if you zoomed in far enough</p>	<p>1 map from the actual language of the bills, of the</p> <p>2 enacted code that dealt with those sections.</p> <p>3 So as part of my practice, I went and</p> <p>4 selected each portion and then I verified it with the</p> <p>5 existing to ensure I had exactly the correct 2011</p> <p>6 starting place from the code. Because that was</p> <p>7 important for me in drafting later on that I made sure</p> <p>8 I had exactly the original, so I would know what</p> <p>9 changes were made to each one of the statutory</p> <p>10 sections.</p> <p>11 Q. Do you know if Ms. Bowen, who I believe you</p> <p>12 acknowledged was the only other person at BLR who was</p> <p>13 drawing maps, do you know if she did the same thing in</p> <p>14 terms of loading -- reloading the congressional map on</p> <p>15 her computer and working from there?</p> <p>16 A. I do not recall. I know we agreed on the color</p> <p>17 scheme and things of that -- I don't recall what her</p> <p>18 process was.</p> <p>19 Q. And did anyone tell you that a good place to</p> <p>20 start was with looking at the 2011 map as the starting</p> <p>21 point for making any changes for the 2020 redraw</p> <p>22 process?</p> <p>23 A. No. And that was still -- if a legislator</p> <p>24 wanted me to start with a clean map, I would have done</p> <p>25 so. That was simply I knew I had to start with what</p>

<p>1 changes were going to be to the statutes. So if there 2 was no preference, this was my starting place because 3 it was going to make drafting simpler for me on the 4 back side. 5 Q. Okay. So say this was on your screen and you 6 mentioned that there was a ticker at the bottom, would 7 the ticker have the overall total population for each 8 of the four congressional districts; do you recall? 9 A. I believe so. I truly do not remember what was 10 all on that screen at the time. 11 Q. And, for example, when you were practicing and 12 moving around, looking at this map, Pulaski County, 13 for example, was in the center of the map, and it 14 looks like it appears in Congressional District 2; is 15 that fair? 16 A. That's fair. 17 Q. Okay. So is it -- do you recall whether when 18 you were looking at the map and you, for example, 19 moved Pulaski County from Congressional 2 to -- to 20 another district for practice, whether or not that 21 changed the total population numbers that you would 22 see for Congressional District 2? 23 A. Yes. I know that it did that because we 24 initially had problems. So I know that it showed me 25 population changes in that ticker, I don't recall what</p>	<p>Page 91</p> <p>1 demographic data on the bottom of the screen as you 2 were making movements to any map, they would be 3 updating on the bottom of the screen in real-time as 4 you were making decisions on -- on your legal 5 computer? 6 A. I want to clarify. I wasn't making the 7 decisions, so to -- yes, the populations -- when a 8 county or precinct was moved, everything changed along 9 the bottom. I don't recall what that was, but I 10 wasn't making the decision as to what to move where. 11 Q. Someone was instructing you -- a legislator was 12 instructing you about a choice and then you were 13 implementing it on the autoBoundEDGE program at the 14 computer? 15 A. That is correct. Scrivener at that point, 16 recording the data that was being given to me in that 17 program. 18 Q. Were you ever -- did you ever raise concerns, 19 for example, with any legislator that in carrying out 20 one of their instructions to you that it -- that 21 that -- carrying out that would raise concerns with 22 you about the rebalancing of populations that was 23 being done in order to redraw the congressional map? 24 MR. TALLEY: I'll let you answer it 25 "yes" or "no." I'll instruct you not to</p> <p>Page 93</p>
<p>1 else is there. 2 Q. Okay. Do you recall whether or not there was 3 any racial breakdowns of any particular county on the 4 ticker at the bottom of the screen? 5 A. I do not remember. 6 Q. Do you know if that was available to you on the 7 ticker at the bottom of the screen based upon the 8 autoBoundEDGE software? 9 A. I know there were other things available, but I 10 have honestly racked my brain. I cannot remember what 11 else was there or if you could reconfigure what you 12 saw down there. I don't remember. 13 Q. And similarly, if you were going to move 14 particular precincts, say for example in Pulaski 15 County, would -- is it your understanding that the 16 ticker at the bottom would change the -- for example, 17 some precincts in southeast Pulaski were moved out of 18 Congressional District 2, would that then reflect at 19 the ticker at the bottom of the screen -- 20 A. Yes. 21 Q. -- after you moved them? 22 A. That is correct. I know the populations changed 23 because that was how I made sure things were moving 24 was looking at that population change. 25 Q. And if there was total population and racial</p> <p>Page 92</p>	<p>1 share any specific member information, 2 communications, and other privileged 3 matters, so... 4 A. No. 5 Q. So you would solely receive the information from 6 a legislator and not, on any circumstance, raise 7 concerns about the instruction that you were being 8 given being appropriate or inappropriate? 9 A. That is correct. 10 Q. Now, you mentioned that you would sometimes 11 start with the 2011 map as a baseline, but are there 12 other times where you started with something else as a 13 baseline to then implement instructions from 14 legislators? 15 A. That's correct. 16 Q. And that could be receiving a map in whole or 17 part from another legislator and putting that up on 18 the screen; is that fair to say? 19 A. That's fair to say. 20 Q. If someone -- is it fair to say that someone 21 would come to you with a hard copy map that you would 22 have to recreate on your legal computer? Did that 23 ever happen? 24 A. That happened on occasion. There were other 25 methods as well.</p> <p>Page 94</p>

Page 95	Page 97
<p>1 Q. What are the other methods?</p> <p>2 MR. TALLEY: Can you reask the question?</p> <p>3 (BY MS. ADEN:)</p> <p>4 Q. So I think I was explaining or seeing if I</p> <p>5 understood your testimony to be correct, that you</p> <p>6 might have the 2011 map on your screen and you would</p> <p>7 make changes based upon instructions from there.</p> <p>8 There were other times that you might start from</p> <p>9 scratch, and so I want to understand what methods --</p> <p>10 like, what would you be importing into autoBoundEDGE</p> <p>11 in order to work off of that, in order to carry out</p> <p>12 instructions.</p> <p>13 And I think you responded that there</p> <p>14 were various methods by which you received that</p> <p>15 initial information into the computer. So I want to</p> <p>16 understand generically what that is.</p> <p>17 Without identifying any specific</p> <p>18 legislator or any specific map that you're working on,</p> <p>19 how would you know what to put on your screen to then</p> <p>20 start making changes at the instruction of a</p> <p>21 particular legislator?</p> <p>22 MR. TALLEY: You can share the general</p> <p>23 different ways to skin the cat, and with --</p> <p>24 I'll instruct you not to answer anything</p> <p>25 specific to individual member requests, what</p>	<p>1 original map?</p> <p>2 A. That's correct.</p> <p>3 Q. And would it be fair to say that -- would you</p> <p>4 then be able to have pulled up on your legal computer</p> <p>5 the files that Ms. Bowen had worked on to then work</p> <p>6 off that?</p> <p>7 A. I can't remember if I could pull it up or if she</p> <p>8 could send me a copy of it, but I would have access to</p> <p>9 that and that might be a starting point for someone</p> <p>10 else.</p> <p>11 Q. Gotcha.</p> <p>12 Okay. Are there any other methods that</p> <p>13 you would have used, besides looking -- starting from</p> <p>14 the 2011 map or working off of a map that had been</p> <p>15 considered proposed in the legislative process, were</p> <p>16 there other methods by which you would work on</p> <p>17 congressional maps and receive -- and then later</p> <p>18 receive instructions from members?</p> <p>19 A. It could be just at -- at times it was a clean</p> <p>20 copy without the 2011 information included, and it was</p> <p>21 easier to start from the information provided to then</p> <p>22 just designate, as I was given the information,</p> <p>23 counties in a certain district.</p> <p>24 Q. Okay. In developing maps, did you look at any</p> <p>25 guidelines or redistricting criteria?</p>
Page 96	Page 98
<p>1 you did with individual members. But just</p> <p>2 generally the process, that's okay.</p> <p>3 A. There would be other times that it may be an</p> <p>4 existing map that had been introduced in a bill that I</p> <p>5 was given that they wanted a change to that particular</p> <p>6 map and so, therefore, I could pull up the previously</p> <p>7 created map and make a change directly from that, not</p> <p>8 from the 2011 version.</p> <p>9 Q. So is it fair to say that there were bills</p> <p>10 introduced by legislators that you may not have drawn?</p> <p>11 A. No, absolutely -- I drew every -- well, I</p> <p>12 drafted every bill that was introduced. I may not</p> <p>13 have drafted the map that was associated with that</p> <p>14 bill. Ms. Bowen had the ability to draft the map</p> <p>15 initially, and autoBound would produce a report of</p> <p>16 what counties and precincts, if there were precincts</p> <p>17 involved, were in each district.</p> <p>18 I would then draft the bill draft from</p> <p>19 that report, but I might not have drawn the original</p> <p>20 map.</p> <p>21 Q. So if the original map, though, had been</p> <p>22 drawn -- if every map that was considered in the</p> <p>23 legislative process was drawn by someone at BLR and</p> <p>24 you had not drawn that original map, is it fair to say</p> <p>25 Ms. Bowen would have been the person to draw the</p>	<p>1 A. In developing the maps? No. It was solely</p> <p>2 based on the legislators' requests.</p> <p>3 Q. Did BLR have a role in developing any</p> <p>4 redistricting criteria that legislators used or</p> <p>5 considered?</p> <p>6 A. Absolutely not.</p> <p>7 Q. Did you offer any guidance for how legislative</p> <p>8 members should interpret any guidelines or</p> <p>9 redistricting criteria?</p> <p>10 MR. TALLEY: I'll let you answer that</p> <p>11 "yes" or "no" generally, but nothing beyond</p> <p>12 that subject -- because of privilege.</p> <p>13 Go ahead.</p> <p>14 A. No, with the exception of the PowerPoint that</p> <p>15 was given, if you're considering that guidance.</p> <p>16 Q. Were you aware of anyone at BLR offering</p> <p>17 guidance to legislators on how they should interpret</p> <p>18 any redistricting criteria or guidelines?</p> <p>19 A. No.</p> <p>20 MR. TALLEY: Same objection.</p> <p>21 (BY MS. ADEN:)</p> <p>22 Q. Can you provide me -- without going into any</p> <p>23 specifics of any one map or any one legislator who</p> <p>24 told you, gave you any instructions, can you provide</p> <p>25 me some ideas of what type of instructions you might</p>

<p>1 get for how to prepare congressional maps? 2 MR. TALLEY: I'll object and instruct 3 the witness not to answer based on 4 legislative privilege. 5 (BY MS. ADEN:) 6 Q. Would it be fair to say that you were given 7 guidance that a particular district should have 8 particular counties in a congressional map? 9 MR. TALLEY: I think that gets into a 10 specific request. 11 (BY MS. ADEN:) 12 Q. No, I'm not looking for any specific legislator 13 who instructed you that. I'm not looking for any 14 particular map by which you were told to put 15 particular counties in. I'm very interested in people 16 coming to the map legal room and they're giving you 17 instructions about how they would like a map. I would 18 like to get a sense of what type of instructions 19 globally you might have gotten; for example, whether a 20 particular district should have particular counties in 21 it. 22 MR. TALLEY: I'll instruct the witness 23 not to answer on the specific types of 24 instructions that went in, and I'll stand on 25 it.</p>	Page 99	<p>1 whether districts that you were drawing where 2 districts or geographic areas were contiguous? 3 A. Yes, I have that capability. 4 Q. And did you have the capability on autoBoundEDGE 5 to run checks on whether or not -- actually, do you 6 understand the term "compactness"? 7 A. Yes, I do. 8 Q. What does that mean to you? 9 A. Compactness is the -- whether or not a district 10 has, for instance, a long-running finger in an area, 11 the total distance being relatively in a uniform shape 12 of some type. 13 Q. Did you consider compactness as you were drawing 14 congressional maps for any legislators? 15 MR. TALLEY: As to any instructions she 16 received from a legislator or any specific 17 request or communications you had with a 18 legislator, I'll instruct the witness not to 19 answer. 20 As to her own personal thoughts, the 21 witness is free to answer. 22 A. I made no policy determinations on any of the 23 redistricting factors when I was drawing the maps. 24 Q. Did you consider compactness when you were 25 drawing congressional maps?</p>	Page 101
<p>1 (BY MS. ADEN:) 2 Q. And similarly, is it fair to say that you were 3 given specific instructions about what particular 4 precincts might belong in a particular district? 5 MR. TALLEY: Same objection; same 6 instruction. 7 (BY MS. ADEN:) 8 Q. Is it fair to say that you were given 9 instructions about particular population compositions 10 that should be in particular districts, whether those 11 are total populations or the racial makeup of 12 particular districts? 13 MR. TALLEY: Same objection; same 14 instruction. 15 (BY MS. ADEN:) 16 Q. Is it fair to say that you were given 17 instructions about whether a particular district 18 should have particular geographic areas in it in order 19 to satisfy the requirement that districts be 20 contiguous; is that fair to say? 21 MR. TALLEY: Same objection; same 22 instruction. 23 (BY MS. ADEN:) 24 Q. Let me ask you: On the autoBoundEDGE program, 25 did you have the capability of running checks on</p>	Page 100	<p>1 MR. TALLEY: Same objection; same 2 instruction. 3 Do you understand that instruction? 4 THE WITNESS: I do. 5 MR. TALLEY: Go ahead. 6 A. My answer is the same. I considered none of the 7 redistricting criteria, compactness, contiguous, any 8 of that. I was only following the instructions of the 9 legislator. I did not make any policy decision or any 10 considerations of my own. 11 Q. Did you have the ability on autoBoundEDGE to run 12 a check on whether or not what you were preparing met 13 any compactness measures? 14 A. I do not recall. 15 Q. And so do -- you do not recall whether or not 16 you ran any compactness checks using autoBound 17 software program? 18 A. I do not recall running any of those checks. I 19 don't remember if that was a feature that was 20 available or not. 21 Q. And so if a legislator wanted to ensure that a 22 map had compact districts or compact areas within it, 23 you were not aware of whether -- what means by 24 which -- by what means would you have carried out that 25 request?</p>	Page 102

<p>1 MR. TALLEY: The witness is free to 2 answer the hypothetical, as I understand the 3 question. Don't share anything that's 4 privileged. 5 A. I would have researched in the autoBound 6 software, and I don't recall if I did that or not at 7 any point in the process. 8 Q. So based upon what you recall about 9 autoBoundEDGE, you were able to look at whether or 10 not -- at the population figures on your screen to 11 determine what the population were in specific areas 12 of the map; is that fair to say? 13 A. That is fair to say. 14 Q. And you recall that based upon the autoBoundEDGE 15 software, you were able to do a check of whether 16 districts were contiguous; is that fair to say? 17 A. I remember that. I don't remember if I utilized 18 that, but I remember it was a feature. 19 Q. Okay. And as you sit here today, you don't 20 recall ever using the autoBound program in order to 21 measure whether districts were compact or not? 22 A. That's correct. 23 Q. Could you -- how would you know, using the 24 autoBoundEDGE program, whether or not political 25 boundaries, such as counties, were kept whole or not?</p>	<p>Page 103</p>	<p>1 text of this email? 2 A. Yes. 3 Q. Okay. Is it fair to say that this email makes 4 clear that legislative members can come to you or 5 Ms. Bowen in order to develop congressional maps? 6 A. That's correct. 7 Q. Okay. And not only that, they can come to you 8 to develop congressional maps, but that you would then 9 prepare a bill for their review? 10 A. That's correct. 11 Q. Okay. And in providing this initial outreach to 12 congressional members, is it fair to say that you 13 shared a map of the state with all four of the other 14 districts illustrated by different colors? 15 A. That's correct. 16 Q. And was that the 2011 map that you're referring 17 to? 18 A. Yes, it is. 19 Q. Okay. So you gave the members of the 20 legislature initially the 2011 map as they -- as you 21 embarked on redrawing the congressional line drawing? 22 A. That's correct. 23 Q. Okay. And you said -- is it fair to say that 24 alongside that map, there was a second attachment that 25 included a view of the district, the target population</p>	<p>Page 105</p>
<p>1 How would you know? 2 A. There was a report that indicated whole counties 3 or precincts, based on the lines drawn on autoBound. 4 Q. And you used the autoBound function in order to 5 be able to run an indicator of whether or not counties 6 and/or precincts were whole or split in some part? 7 A. That's correct. 8 Q. You recall using that function of autoBoundEDGE? 9 A. Yes, because that was the report that we needed 10 to be able to draft the legislation. 11 Q. Okay. Let me show you what I'm marking as 12 Exhibit 2. This is an email from Matthew Miller to 13 you, Ms. Davenport, and Ms. Bowen, dated August 31st, 14 2021, subject, "Revised." It's BLR-CMA-04233. 15 A. Thank you. 16 (Exhibit 2 marked for identification.) 17 A. Yes, ma'am. 18 Q. Okay. Do you recognize this email? 19 A. I do. 20 Q. Okay. Do you recall whether this is the type of 21 email that you or someone else from BLR would have 22 sent to legislators during the congressional redrawing 23 process? 24 A. Yes. 25 Q. Okay. Did you have a role in developing the</p>	<p>Page 104</p>	<p>1 for each district, the variance of each district, and 2 the overall population of the district? Is that fair? 3 A. I will clarify that I did not send this initial 4 email; Mr. Miller did. But that is my understanding 5 of what was included in the email. 6 Q. Okay. And that was based upon the 2011 data; is 7 that what you recall? 8 A. The original map is based on the 2011 data. The 9 congressional districts are based on the 2011 data. 10 The population numbers are based on the 2020 data. 11 Q. So by -- okay. This is August 31st, 2021. So 12 you think by this time, you're giving them updated 13 census information? 14 A. That's correct. 15 Q. Okay. And then you're telling them based upon 16 the updated census information, you can come to either 17 of us if you want to develop a redrawn congressional 18 map in light of the new data? 19 A. That's correct. 20 Q. Okay. There is a line in here that reads, 21 "Please review your map to ensure I have accurately 22 captured your intent." 23 Do you see that line? 24 A. Yes. 25 Q. Okay. Do you know what you meant by that?</p>	<p>Page 106</p>

<p>Page 107</p> <p>1 A. And, again, this was sent by Matthew. I would</p> <p>2 say that that is a line that we would always include</p> <p>3 in transmission to ensure that we have captured the</p> <p>4 intent and the request of the legislator accurately.</p> <p>5 Q. So is it fair to say that in developing</p> <p>6 congressional maps, you, in coordination with a</p> <p>7 legislator or legislators, were trying to carry out</p> <p>8 their intent in redrawing a line?</p> <p>9 MR. TALLEY: I'll object on legislative</p> <p>10 privilege grounds and instruct the witness</p> <p>11 not to answer.</p> <p>12 (BY MS. ADEN:)</p> <p>13 Q. Based upon the plain text of this email, is it</p> <p>14 fair to say that you conveyed to legislators that your</p> <p>15 job was to help them implement their intent in drawing</p> <p>16 congressional lines during the redistricting cycle?</p> <p>17 MR. TALLEY: As to what your role was</p> <p>18 with respect to any individual draft piece</p> <p>19 of legislation or maps sent to a member, I</p> <p>20 will instruct the witness not to answer on</p> <p>21 legislative privilege grounds.</p> <p>22 As to what this template email says,</p> <p>23 that's Exhibit 2, the witness is free to</p> <p>24 answer.</p> <p>25 A. The document speaks for itself. I want to</p>	<p>Page 109</p> <p>1 answering that as to what her general role</p> <p>2 is, or was, in this process, so free to</p> <p>3 answer on that front.</p> <p>4 Do you understand that instruction?</p> <p>5 THE WITNESS: I do.</p> <p>6 MR. TALLEY: Go ahead.</p> <p>7 A. As to the template email and as to my intent,</p> <p>8 yes, to ensure that I have captured the intent</p> <p>9 provided to me.</p> <p>10 Q. And are you aware that this email was sent out</p> <p>11 to members of the General Assembly?</p> <p>12 A. Yes -- well, actually --</p> <p>13 MR. TALLEY: Object -- object to form.</p> <p>14 Go ahead.</p> <p>15 A. Actually, I'm not sure if this exact email was</p> <p>16 sent. I know this was what was sent to me as template</p> <p>17 language. I don't recall if this exact, with all of</p> <p>18 these specifics, were included in that email that went</p> <p>19 out. I don't recall that.</p> <p>20 MR. TALLEY: And I'd go ahead and say</p> <p>21 for our record, to the extent this email was</p> <p>22 blasted out to members of the General</p> <p>23 Assembly, I would take the position that</p> <p>24 that communication would be privileged and</p> <p>25 not discoverable.</p>
<p>Page 108</p> <p>1 ensure the map that I had created reflected the intent</p> <p>2 that was given in the -- what was asked to be drawn.</p> <p>3 Q. Right. So, I mean, just more colloquially, you</p> <p>4 were offering yourself up to legislators to help them</p> <p>5 redraw the congressional district lines after the</p> <p>6 census, which they were required to do based upon the</p> <p>7 new census data; is that fair?</p> <p>8 A. It's fair to say that it was my job to input</p> <p>9 whatever information they wanted into a congressional</p> <p>10 map so that I could then draft legislation based on</p> <p>11 their determinations.</p> <p>12 Q. But is it fair to say that in your role, in</p> <p>13 coordination with them, you were carrying out their</p> <p>14 goals and desires for a particular congressional map?</p> <p>15 "Yes" or "no."</p> <p>16 MR. TALLEY: I'll jump in. Instruct the</p> <p>17 witness not to answer the question based on</p> <p>18 legislative privilege as to whether or not</p> <p>19 some specific piece of legislation was the</p> <p>20 product of the intent of some particular</p> <p>21 member of the legislature. I think we know</p> <p>22 what we're doing here.</p> <p>23 As to the content of this template or</p> <p>24 draft template email, the draft that was put</p> <p>25 together, I'm fine with the witness</p>	<p>Page 110</p> <p>1 MS. ADEN: But is it fair to say that</p> <p>2 the record reflects that this email was</p> <p>3 produced by BLR? It's Bates-stamped</p> <p>4 BLR-CMA-04233.</p> <p>5 MR. TALLEY: Sure. And this is the --</p> <p>6 the internal template that was sent from</p> <p>7 Matthew Miller to other Bureau staffers.</p> <p>8 And I think I can go ahead and represent</p> <p>9 this: I'm pretty sure this email, or</p> <p>10 something like it, was sent from the Bureau</p> <p>11 to the actual membership, and that email, I</p> <p>12 take the position, is privileged.</p> <p>13 (BY MS. ADEN:)</p> <p>14 Q. Just as a practical reality, given what you</p> <p>15 testified to already, is it fair to say that if you</p> <p>16 and one or more legislators was in the legal room</p> <p>17 developing congressional maps together and your job</p> <p>18 was to implement what they wanted to be reflected in a</p> <p>19 congressional map, that you and that legislator or</p> <p>20 legislators are the people who would know whether the</p> <p>21 map accurately captures their goals one way or the</p> <p>22 other? Is that fair to say?</p> <p>23 MR. TALLEY: I'll jump in and instruct</p> <p>24 the witness not to answer based on</p> <p>25 legislative privilege because we're talking</p>

<p>Page 111</p> <p>1 about the intent of individual members and</p> <p>2 what they were doing with respect to draft</p> <p>3 legislation.</p> <p>4 (BY MS. ADEN:)</p> <p>5 Q. Okay. And one last question on this: Is it</p> <p>6 fair to say, based on the testimony you've given</p> <p>7 today, that only you and a member -- one or more</p> <p>8 members of the legislature would know what directions</p> <p>9 you were given about any particular aspect of a</p> <p>10 congressional map, you would be the source of that</p> <p>11 information; is that fair to say?</p> <p>12 A. Yes.</p> <p>13 MR. TALLEY: That's fine.</p> <p>14 (BY MS. ADEN:)</p> <p>15 Q. Okay. Do you -- did you have access to all</p> <p>16 draft congressional maps?</p> <p>17 A. I don't recall if I had direct access or if Lori</p> <p>18 had to send me one that she had done. I don't recall.</p> <p>19 Q. And just to make sure I'm clear for the record:</p> <p>20 When you would work on a congressional map in the</p> <p>21 legal room, alone or with one or more legislators,</p> <p>22 would you save every map that you created on that</p> <p>23 legal room computer?</p> <p>24 A. If the member asked me to save that version,</p> <p>25 yes.</p>	<p>Page 113</p> <p>1 you could -- you could use the boundaries that you had</p> <p>2 available to you in 2020 but use the population</p> <p>3 numbers for 2011? Is that what you're describing?</p> <p>4 A. That was an option, yes.</p> <p>5 Q. Did you ever do that?</p> <p>6 A. Not that I recall.</p> <p>7 Q. Do you know if you were allowed to merge</p> <p>8 features of different maps on autoBoundEDGE?</p> <p>9 A. Not that I recall.</p> <p>10 Q. Did you look at other maps for other entities in</p> <p>11 Arkansas, like school districts, when developing</p> <p>12 congressional maps?</p> <p>13 A. I did not.</p> <p>14 Q. Do you know if you were -- had information</p> <p>15 available to you to look at boundaries for other</p> <p>16 bodies in Arkansas as you were developing</p> <p>17 congressional maps?</p> <p>18 A. I cannot recall specifically if city lines were</p> <p>19 available. I just don't recall what was available.</p> <p>20 Q. I want to show you what is -- I'm marking as</p> <p>21 Exhibit 3, which is a BLR-CMA-00588 to 592 email</p> <p>22 exchange. This is from Shelby Johnson to a number of</p> <p>23 people including you, Ms. Davenport, dated August</p> <p>24 16th, 2021.</p> <p>25 Let me strike that and come back to it</p>
<p>Page 112</p> <p>1 Q. Do you recall ever working with any legislator,</p> <p>2 not naming any particular legislator, in the legal</p> <p>3 room and working on a map that you did not save?</p> <p>4 A. Yes.</p> <p>5 Q. Can you give me, generally, a reason why you</p> <p>6 would not save a map?</p> <p>7 MR. TALLEY: I'll instruct the witness</p> <p>8 not to answer based on legislative</p> <p>9 privilege.</p> <p>10 (BY MS. ADEN:)</p> <p>11 Q. And if a map was not saved, is there any record</p> <p>12 of the work that you would have done with one or more</p> <p>13 legislators in the legal room?</p> <p>14 A. No.</p> <p>15 Q. I believe earlier you mentioned that autoBound</p> <p>16 allowed you to at least compare the 2011 map to</p> <p>17 whatever map you were developing; is that fair, or did</p> <p>18 I get that wrong?</p> <p>19 A. If requested, I could have gone back and drawn</p> <p>20 this same map in 2020 -- excuse me, 2011 data, as what</p> <p>21 was drawn in 2020 data.</p> <p>22 Q. Okay.</p> <p>23 A. And then that could -- that was a capability. I</p> <p>24 could change the data set to go back to 2011.</p> <p>25 Q. So you could see, using the geography of 20- --</p>	<p>Page 114</p> <p>1 and show you something else.</p> <p>2 You mentioned earlier the ability of</p> <p>3 autoBoundEDGE to generate reports, so I want to mark</p> <p>4 as Exhibit 3, and not the thing that I was referring</p> <p>5 to before, but Exhibit 3 what is a document</p> <p>6 Bates-stamped BLR-CMA-04156, which is an email from</p> <p>7 Jennifer Wheeler to you, Ms. Davenport, dated August</p> <p>8 25th, 2021.</p> <p>9 A. Thank you.</p> <p>10 (Exhibit 3 marked for identification.)</p> <p>11 Q. Do you recognize -- well, I'll give you a</p> <p>12 second.</p> <p>13 A. In general I remember the email.</p> <p>14 Q. I want to direct you to the text in the first</p> <p>15 email exchange from 12:56 where Jennifer is writing to</p> <p>16 you and says, "Did Fred get back with you? I should</p> <p>17 have looked" -- looked -- "I should have looked at</p> <p>18 your reports table and the config file. Below is a</p> <p>19 screenshot of what mine looks like. Does yours look</p> <p>20 similar?"</p> <p>21 Did I read that accurately?</p> <p>22 A. You did.</p> <p>23 Q. Okay. What do you understand Ms. Wheeler to be</p> <p>24 conveying to you in this email?</p> <p>25 A. There was -- we were having difficulty with</p>

<p>Page 115</p> <p>1 autoBound and accessing, and this was actually a table</p> <p>2 that she had access to and knew how to get to and we</p> <p>3 did not. And I had no idea what this information was</p> <p>4 that was in the configuration module, and we left that</p> <p>5 up to our IT director.</p> <p>6 So I had asked the question of how do</p> <p>7 you get the reports to run, and she sent me this back</p> <p>8 and said, "I don't know what this is, send it to my IT</p> <p>9 person."</p> <p>10 Q. Did you ever send -- I'm looking at the chart in</p> <p>11 this email, just below that text, there is a column</p> <p>12 labeled "Report name," and then there is a subcolumn</p> <p>13 underneath for bill language.</p> <p>14 And looking at the far left column, I</p> <p>15 want to direct you to row 7. There is language that</p> <p>16 says "Majority minority."</p> <p>17 Do you recall seeing this?</p> <p>18 A. Vaguely. I knew that there was a list of</p> <p>19 reports. I don't recall -- I mean, I can see that</p> <p>20 it's here on the document. I don't recall</p> <p>21 independently what all the names of the reports were</p> <p>22 or what they looked like when you ran them.</p> <p>23 Q. Do you recall that autoBoundEDGE allowed you to</p> <p>24 produce a report indicated as majority-minority?</p> <p>25 A. If it's here, I assume it allowed that. I don't</p>	<p>Page 117</p> <p>1 Q. And there is a row on line 10, "African American</p> <p>2 majority-minority."</p> <p>3 Do you remember running a report with</p> <p>4 that -- under that category?</p> <p>5 A. Again, I cannot recall which specific report was</p> <p>6 requested.</p> <p>7 Q. And similarly, there's a row -- row 13,</p> <p>8 "Majority minority summary."</p> <p>9 Do you recall using that function?</p> <p>10 A. I don't recall specifically if that was the</p> <p>11 function that was requested.</p> <p>12 Q. And in row 14, there is an "African American</p> <p>13 majority minority summary report available."</p> <p>14 Do you recall that?</p> <p>15 A. Again, same answer. I don't recall which</p> <p>16 specific report that was run.</p> <p>17 Q. But using autoBoundEDGE, you do recall running</p> <p>18 reports that had racial demographic data at the</p> <p>19 request of one or more legislators, generally?</p> <p>20 MR. TALLEY: I'll let her answer that</p> <p>21 one "yes," "no," "I don't know." Anything</p> <p>22 beyond that, I'll instruct the witness not</p> <p>23 to answer.</p> <p>24 A. Yes.</p> <p>25 Q. And if you ran a report with the racial</p>
<p>Page 116</p> <p>1 have an independent recollection of it.</p> <p>2 Q. So do you recall ever running reports for</p> <p>3 majority-minority?</p> <p>4 A. I can't remember if that was the report that was</p> <p>5 requested. I know I ran several types of reports upon</p> <p>6 request, but I don't remember the exact names of which</p> <p>7 ones. I know I ran the bill language report for every</p> <p>8 map because that's what I needed.</p> <p>9 Q. And the bill language report, though, had the</p> <p>10 precincts or counties that would be included in the</p> <p>11 map? Is that what you're referring to?</p> <p>12 A. That's correct, yes.</p> <p>13 Q. Okay. So looking at row 9, though, there's a</p> <p>14 row for racial demographics.</p> <p>15 Do you see that?</p> <p>16 A. I do.</p> <p>17 Q. Okay. Do you remember running reports with</p> <p>18 racial demographics?</p> <p>19 A. Again, I know that I ran several reports upon</p> <p>20 request, but I don't recall which ones were which. I</p> <p>21 mean, I don't recall if it was that report or if it</p> <p>22 was a different report.</p> <p>23 Q. But you do recall reports with racial</p> <p>24 demographic data as part of it?</p> <p>25 A. Yes.</p>	<p>Page 118</p> <p>1 demographics of a particular district for any</p> <p>2 legislator based upon your earlier testimony, that</p> <p>3 report would not necessarily go to every member of the</p> <p>4 General Assembly, is that fair to say, from BLR?</p> <p>5 MR. TALLEY: I'll let her answer it</p> <p>6 "yes," "no," "I don't know." I'm not</p> <p>7 intending, on behalf of the Bureau or the</p> <p>8 witness, certainly not on behalf of the</p> <p>9 legislators who hold the privilege, to waive</p> <p>10 any of this.</p> <p>11 That said, I'm giving Leah some leeway</p> <p>12 to explore the contours of the privilege and</p> <p>13 will allow the answer to "yes," "no," "I</p> <p>14 don't know," but nothing beyond that.</p> <p>15 (BY MS. ADEN:)</p> <p>16 Q. And if you don't mind restating exactly what</p> <p>17 you're asking on.</p> <p>18 A. Based upon your earlier testimony and what we've</p> <p>19 just been discussing about the availability of reports</p> <p>20 of the racial data, if you had been requested to</p> <p>21 provide that, which is, I think, conceded you did it</p> <p>22 on at least one occasion. If you provided that to a</p> <p>23 member of the legislator [sic], are you aware of</p> <p>24 whether BLR would have provided that same racial data</p> <p>25 to other members of the legislator?</p>

<p>Page 119</p> <p>1 MR. TALLEY: Same objection; same</p> <p>2 instruction.</p> <p>3 Go ahead.</p> <p>4 A. No.</p> <p>5 Q. Because BLR would not, as a matter of practice,</p> <p>6 provide a particular report that it would have</p> <p>7 provided to a particular legislator or legislators to</p> <p>8 every other member of the General Assembly?</p> <p>9 A. That's correct.</p> <p>10 Q. Okay. Do you know when you generated these</p> <p>11 racial demographic report what type of racial</p> <p>12 demographic was included in them?</p> <p>13 A. I do not recall.</p> <p>14 Q. Was there a standard racial demographic report</p> <p>15 that you would use?</p> <p>16 A. It was at the direction of a member. It was not</p> <p>17 a standard. That's why I don't recall which report</p> <p>18 has been generated --</p> <p>19 Q. But meaning --</p> <p>20 A. -- under which category.</p> <p>21 Q. I'm sorry.</p> <p>22 But meaning when you went into</p> <p>23 autoBoundEDGE, did you run the same -- if someone</p> <p>24 asked you for racial demographic data, would you go</p> <p>25 into autoBoundEDGE and run the exact same report every</p>	<p>Page 121</p> <p>1 data for any member of the legislature?</p> <p>2 A. No.</p> <p>3 Q. Okay. I want to ask about data that was -- a</p> <p>4 little bit more about data that was on the screen as</p> <p>5 you were developing congressional maps.</p> <p>6 Just to make sure I'm clear for the</p> <p>7 record, I think you testified that you know that there</p> <p>8 was total population of data on a ticker at the bottom</p> <p>9 of the screen that you were working on, and I don't</p> <p>10 think you were -- could recall exactly what other</p> <p>11 information was on the screen; is that fair?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. Do you know whether or not you kept the</p> <p>14 same information on the screen, or did you turn off</p> <p>15 different data points as you were working in</p> <p>16 congressional maps?</p> <p>17 A. It was always the same information.</p> <p>18 Q. And you were not turning off any categories of</p> <p>19 information as you were working on congressional maps?</p> <p>20 A. No, that's correct. The only -- I want to</p> <p>21 clarify. The only part that could be turned on and</p> <p>22 off was the actual -- there were lines that would</p> <p>23 outline each congressional district. At times those</p> <p>24 were turned on and off because it was difficult to see</p> <p>25 around where you were on the screen, or they were too</p>
<p>Page 120</p> <p>1 time a request like that was made, or were there</p> <p>2 different variations of racial demographic data that</p> <p>3 were available to you?</p> <p>4 A. There were different versions of racial</p> <p>5 demographic data that were available.</p> <p>6 Q. And to be clear, looking at this -- if you could</p> <p>7 take a moment to look at the -- at least the</p> <p>8 categories that are identified in 2 through 42, do you</p> <p>9 see any reports that indicate the ability to provide</p> <p>10 political data or political performance data?</p> <p>11 A. I'll let the exhibit speak for itself, but this</p> <p>12 was not a copy of the reports table from my email.</p> <p>13 This was from Ms. Wheeler's. So I don't see anything,</p> <p>14 but I didn't work off of her system. I think we had a</p> <p>15 different setup, so I don't know specifically.</p> <p>16 To my knowledge, I did not have that</p> <p>17 political information available. So I don't know if</p> <p>18 she had it under her system. I know we did not have</p> <p>19 it available in ours.</p> <p>20 Q. Would Ms. Wheeler have been providing data</p> <p>21 separately to members of the General Assembly about</p> <p>22 congressional maps?</p> <p>23 A. I have -- can't speculate as to what she did.</p> <p>24 Q. Okay. And you don't recall ever generating a</p> <p>25 report with political data or electoral performance</p>	<p>Page 122</p> <p>1 thick, or there was a request just to not have those</p> <p>2 on there and just leave the colors.</p> <p>3 Q. Understood. Okay.</p> <p>4 A. But that was the only kind of change. It wasn't</p> <p>5 a change to the ticker. That was just a feature on</p> <p>6 the map itself.</p> <p>7 Same with county names could be turned</p> <p>8 on or off at that point, but that was not changing the</p> <p>9 ticker at the bottom.</p> <p>10 Q. Okay. So whatever was on the ticker stayed on</p> <p>11 the bottom of the screen, and if there were changes in</p> <p>12 the map, it would be updated, and you would see those</p> <p>13 updates as you were working in a map?</p> <p>14 A. That's correct.</p> <p>15 Q. Okay. So talking about population imbalances</p> <p>16 following the 2020 census. Based on the State's</p> <p>17 population growth from 2010 to 2020, how many people</p> <p>18 should each of the four congressional districts have</p> <p>19 contained?</p> <p>20 A. I cannot recall.</p> <p>21 Q. Do you know if there were population imbalances</p> <p>22 between the four congressional districts that needed</p> <p>23 to be addressed following the 2020 census?</p> <p>24 A. Absolutely.</p> <p>25 Q. Do you know generically whether or not there</p>

<p>Page 123</p> <p>1 were any particular districts that had too many people</p> <p>2 in it following the 2020 census?</p> <p>3 A. Yes. Northwest Arkansas had a dramatic increase</p> <p>4 in population, and Southern Arkansas, in general, had</p> <p>5 a decrease in population.</p> <p>6 Q. And so do you know, based upon the districts</p> <p>7 associated with the 2011 map, what districts that</p> <p>8 would have mostly impacted? All four of them or</p> <p>9 certain districts?</p> <p>10 A. I'm trying to remember the district number.</p> <p>11 I'll be happy to refer back to the map. I don't</p> <p>12 remember which districts correspond with which. It's</p> <p>13 been a while since I've looked at the maps.</p> <p>14 Q. So do you mind looking at Exhibit 1?</p> <p>15 A. Happy to.</p> <p>16 Q. Okay.</p> <p>17 A. There was a strong increase in population in</p> <p>18 District 3. Districts 4 and 1 had a decreasing</p> <p>19 population, and I believe District 2 had a somewhat</p> <p>20 stable to increasing population.</p> <p>21 Q. So then those districts needed to be rebalanced</p> <p>22 following the census?</p> <p>23 A. That's correct.</p> <p>24 Q. But based upon what you've just described, you</p> <p>25 didn't understand that District 2, following the</p>	<p>Page 125</p> <p>1 format that would direct what those priorities would</p> <p>2 be.</p> <p>3 Q. And does that mean that at the instruction of</p> <p>4 any particular legislator, the population variances</p> <p>5 could be whatever they desire them to be, as far as</p> <p>6 you understood it?</p> <p>7 A. As far as my assignments, that was up to them on</p> <p>8 how they would like to see the map drawn.</p> <p>9 Q. Do you know if there was a goal generally, in</p> <p>10 the General Assembly, to have no more than a 1 percent</p> <p>11 deviation in the design of the four congressional</p> <p>12 districts?</p> <p>13 A. I can't speak to what their goals were, and I</p> <p>14 have no written law or anything establishing that</p> <p>15 there was to be a 1 percent goal.</p> <p>16 Q. Are you aware of whether there were any</p> <p>17 acceptable reasons why someone may not rebalance the</p> <p>18 population to as equal persons between the districts</p> <p>19 as possible?</p> <p>20 A. I know that there are --</p> <p>21 MR. TALLEY: I will instruct the witness</p> <p>22 not to share any privileged communications</p> <p>23 or information.</p> <p>24 As to your own personal knowledge that's</p> <p>25 not privileged, the witness is free to</p>
<p>Page 124</p> <p>1 census, was overly populated by a significant number</p> <p>2 of people?</p> <p>3 A. I can't remember what the distribution was as a</p> <p>4 total. I don't remember which one. I know that</p> <p>5 District 3 had a significant increase that had to be</p> <p>6 balanced, but I don't remember what the differences</p> <p>7 were between 1 and 2, and even with 4. I know it was</p> <p>8 decreased, but I can't remember what the percentages</p> <p>9 were.</p> <p>10 Q. What was the standard for balancing populations</p> <p>11 among congressional districts following the 2020</p> <p>12 census?</p> <p>13 A. There was no standard set in Arkansas, to my</p> <p>14 understanding.</p> <p>15 Q. So as far as you were aware, there was no</p> <p>16 standard to rebalance the population to have as equal</p> <p>17 number of people, down to the person, among</p> <p>18 congressional districts?</p> <p>19 A. Other than the general redistricting criteria</p> <p>20 that I know about nationwide with one-person,</p> <p>21 one-vote, there are no statutory or constitutional</p> <p>22 provisions within the State of Arkansas that</p> <p>23 establishes what the priorities will be for</p> <p>24 congressional redistricting.</p> <p>25 So I'm not aware of any law in that</p>	<p>Page 126</p> <p>1 answer, but I'm not so certain I understand</p> <p>2 the question.</p> <p>3 Go ahead.</p> <p>4 A. On a personal basis, I know that there are</p> <p>5 different criteria that are looked at to make those</p> <p>6 balancing tests. But I know that there are cases all</p> <p>7 over the place and it's highly fact-specific. But</p> <p>8 that's from my personal research that I did leading</p> <p>9 into that, I don't have anything related to goals of</p> <p>10 members or of the legislature as a whole.</p> <p>11 Q. Did you present or provide any guidance to</p> <p>12 members of the General Assembly about what reasons may</p> <p>13 justify a departure from rebalancing the populations</p> <p>14 between any particular districts?</p> <p>15 MR. TALLEY: I'll let the witness share</p> <p>16 factual information related to the</p> <p>17 presentation that was done at State</p> <p>18 Agencies. But beyond that, I'll instruct</p> <p>19 the witness not to answer on privilege</p> <p>20 grounds.</p> <p>21 Go ahead.</p> <p>22 A. And that's -- whatever was included in my</p> <p>23 summary presentation. I can't remember if I</p> <p>24 specifically went into a 1 percent deviation question</p> <p>25 at that time. But at that time that would have been</p>

<div>Page 127</div> <div><div>1</div><div>the information provided during that committee</div><div>2</div><div>meeting.</div><div>3</div><div>Q. But as you understood, that wasn't a rule or</div><div>4</div><div>anything required by any law, federal or state, as far</div><div>5</div><div>as you were aware?</div><div>6</div><div>A. That's my understanding.</div><div>7</div><div>Q. Okay. When you were developing congressional</div><div>8</div><div>district maps this cycle, did you understand that you</div><div>9</div><div>should try to avoid as many county splits as possible?</div><div>10</div><div>A. That was not within my purview. That's not</div><div>11</div><div>something I would make a policy decision about.</div><div>12</div><div>Q. Okay. Are you familiar with what "respecting</div><div>13</div><div>communities of interest" means?</div><div>14</div><div>A. From a formbook case law basis, yes. But,</div><div>15</div><div>again, I wasn't making any policy decisions regarding</div><div>16</div><div>the congressional maps.</div><div>17</div><div>Q. Do you know if you had any data available to you</div><div>18</div><div>identifying communities of interest in Arkansas?</div><div>19</div><div>A. I can't recall if I had that information or if</div><div>20</div><div>it was in the census data, or not.</div><div>21</div><div>Q. And how would you define a community of</div><div>22</div><div>interest?</div><div>23</div><div>A. I would have to look back at the technical</div><div>24</div><div>definition. I know that it was a community that's not</div><div>25</div><div>necessarily governed by geographic means but by some</div></div>	<div>Page 128</div> <div><div>1</div><div>other cultural or social grouping that has significant</div><div>2</div><div>ties together.</div><div>3</div><div>I'm more familiar with it, to be honest,</div><div>4</div><div>from the NEPA background I have working with</div><div>5</div><div>environmental law where you're looking at, whether</div><div>6</div><div>there's a significant community involvement.</div><div>7</div><div>So that's where my information is coming</div><div>8</div><div>from, not really in the terms of redistricting, but</div><div>9</div><div>communities of interest are generally those that have</div><div>10</div><div>a significant tie together that's not necessarily</div><div>11</div><div>governed by -- excuse me -- geographical bounds.</div><div>12</div><div>Q. Do you know whether Arkansas, for example, based</div><div>13</div><div>upon any of your experiences, defines the Delta, for</div><div>14</div><div>example, as a community of interest?</div><div>15</div><div>A. I'm not aware of any statutory or case law that</div><div>16</div><div>talks about that specifically. No, I'm not aware of</div><div>17</div><div>any.</div><div>18</div><div>Q. Do you remember hearing, during the</div><div>19</div><div>congressional line drawing process, people seeking to</div><div>20</div><div>protect row crop farmers during the development of</div><div>21</div><div>congressional maps?</div><div>22</div><div>MR. TALLEY: I'll object and instruct</div><div>23</div><div>the witness not to answer based on</div><div>24</div><div>legislative privilege.</div><div>25</div><div>Though, I will say to the extent there</div></div>
<div>Page 129</div> <div><div>1</div><div>is some answer you could provide that was</div><div>2</div><div>outside the legislative activity you were</div><div>3</div><div>doing, you're free to answer.</div><div>4</div><div>A. There was discussion in a committee meeting in</div><div>5</div><div>which I was present, but that's the extent of the</div><div>6</div><div>information.</div><div>7</div><div>Q. Do you remember implementing a map in order to</div><div>8</div><div>protect the interest of row -- to protect the interest</div><div>9</div><div>of row crop farmers during the congressional map</div><div>10</div><div>drawing process?</div><div>11</div><div>MR. TALLEY: I'll instruct the witness</div><div>12</div><div>not to answer based on legislative</div><div>13</div><div>privilege.</div><div>14</div><div>(BY MS. ADEN:)</div><div>15</div><div>Q. Do you know if BLR compiled a list of</div><div>16</div><div>identifiable communities of interest during this round</div><div>17</div><div>of congressional line drawing?</div><div>18</div><div>A. No.</div><div>19</div><div>Q. Are you familiar with maintaining cores of</div><div>20</div><div>existing districts?</div><div>21</div><div>A. I have heard that term, but I'm not -- again, it</div><div>22</div><div>was a policy question. I remember that it was one of</div><div>23</div><div>the considerations that some states use in their</div><div>24</div><div>redistricting criteria but not any further than that.</div><div>25</div><div>And I know it's been an issue in some case law that I</div></div>	<div>Page 130</div> <div><div>1</div><div>have read in the past, but not anything more</div><div>2</div><div>significant than that.</div><div>3</div><div>Q. So based upon your own testimony, correct me if</div><div>4</div><div>I'm wrong, but is it fair to say that if any</div><div>5</div><div>particular legislator wanted to implement communities</div><div>6</div><div>of interest, that, from your understanding, there's no</div><div>7</div><div>rule directing that legislator to capture any</div><div>8</div><div>particular community of interest? It's if they wanted</div><div>9</div><div>to do it or not, you would develop a map in order to</div><div>10</div><div>implement that aspiration?</div><div>11</div><div>MR. TALLEY: Object to form.</div><div>12</div><div>(BY MS. ADEN:)</div><div>13</div><div>Q. Did you understand my question?</div><div>14</div><div>A. I did.</div><div>15</div><div>And, again, what their intents or</div><div>16</div><div>processes are is all solely within their purview. My</div><div>17</div><div>job is simply to capture that into a format that can</div><div>18</div><div>be translated into a bill draft.</div><div>19</div><div>Q. And if a legislator wanted to reduce county</div><div>20</div><div>splits, you would not be telling them that there was</div><div>21</div><div>some rule about whether or not you could keep counties</div><div>22</div><div>whole or not, you would be implementing their</div><div>23</div><div>particular desires on a map to have whole counties or</div><div>24</div><div>not. Is that fair to say?</div><div>25</div><div>MR. TALLEY: I'll let the witness answer</div></div>

<p>1 the hypothetical and instruct her not to</p> <p>2 share anything protected by privilege.</p> <p>3 Go ahead.</p> <p>4 A. In a hypothetical, yes, that's correct.</p> <p>5 Q. And that would be true of any redistricting</p> <p>6 criteria that any particular legislator had in mind.</p> <p>7 Nothing required them to implement that particular</p> <p>8 criteria, as far as you understand. It would be their</p> <p>9 personal desire in a map. Is that fair to say?</p> <p>10 MR. TALLEY: I'll allow the witness to</p> <p>11 answer the hypothetical and instruct her not</p> <p>12 to share any information protected by</p> <p>13 privilege.</p> <p>14 A. That's correct.</p> <p>15 Q. Okay. And I'm going to just show you very</p> <p>16 quickly -- well, can you hold that.</p> <p>17 Are you familiar with avoiding dilution</p> <p>18 of minority voting strength?</p> <p>19 A. Again, in a very nebulous, from reading general</p> <p>20 case law and general hornbook, I recognize that</p> <p>21 principle.</p> <p>22 Q. Do you know if that's a requirement for</p> <p>23 developing congressional redistricting maps in</p> <p>24 Arkansas?</p> <p>25 A. To my knowledge, it is not because Arkansas does</p>	Page 131	<p>1 what I'm understanding?</p> <p>2 A. It may. There may be federal requirements that</p> <p>3 are out there that need to be considered. But when it</p> <p>4 comes to the State process of choosing which criteria</p> <p>5 they are going to base those redistricting lines on,</p> <p>6 that is not documented anywhere in statute or</p> <p>7 constitution.</p> <p>8 Q. And did you advise members of the General</p> <p>9 Assembly on what, if any, federal requirements may</p> <p>10 apply to the redistricting cycle?</p> <p>11 MR. TALLEY: I'll allow the witness to</p> <p>12 answer that "yes," "no," "I don't know,"</p> <p>13 solely for the purposes of exploring the</p> <p>14 contours of privilege, but instruct the</p> <p>15 witness not to share anything beyond that on</p> <p>16 privilege grounds.</p> <p>17 Go ahead.</p> <p>18 A. In the training -- excuse me. Not training.</p> <p>19 But in the documents in the committee meeting</p> <p>20 presentation, I believe I touched on some of the</p> <p>21 federal requirements and the general redistricting</p> <p>22 principles; however, I don't remember if it was</p> <p>23 specific to making a distinction between Arkansas law</p> <p>24 and federal law at that point.</p> <p>25 Q. Okay. And are you familiar with avoiding</p>
<p>1 not have any redistricting criteria that is</p> <p>2 established by statute or by constitution.</p> <p>3 So there's been no enacted law that</p> <p>4 governs, within the State of Arkansas, how those</p> <p>5 congressional districts will be set or stationed.</p> <p>6 Q. Are you familiar with avoiding racial</p> <p>7 gerrymandering?</p> <p>8 A. Again, I've heard the term, and I've read some</p> <p>9 of the case law in other states that discuss that.</p> <p>10 Other than that, that's my experience with looking at</p> <p>11 that.</p> <p>12 Q. But do you have a similar answer with avoiding</p> <p>13 racial dilution as with racial gerrymandering, that</p> <p>14 there is no particular requirement that Arkansas avoid</p> <p>15 racial gerrymandering?</p> <p>16 A. That's correct.</p> <p>17 And when I'm saying Arkansas, I'm saying</p> <p>18 Arkansas Code, Arkansas law. There are federal</p> <p>19 considerations that are out there; however, I'm</p> <p>20 speaking specifically as to the criteria for</p> <p>21 redistricting congressional districts that's</p> <p>22 established. There is nothing in statute or code that</p> <p>23 directs that.</p> <p>24 Q. But federal law may require avoiding racial vote</p> <p>25 dilution or avoiding racial gerrymandering? Is that</p>	Page 132	<p>1 partisan gerrymandering?</p> <p>2 A. I am aware of that on a case basis, that it's</p> <p>3 currently in litigation in multiple states as to</p> <p>4 whether or not that's going to be considered a</p> <p>5 redistricting criteria.</p> <p>6 And, again, mainly based on the</p> <p>7 questions that were presented at NCSL, that it was</p> <p>8 definitely a question that was currently in litigation</p> <p>9 and actively being looked at as to whether partisan</p> <p>10 gerrymandering would be a allowable or unallowable</p> <p>11 criteria for redistricting. I knew it was a question</p> <p>12 still within the circuits.</p> <p>13 Q. Do you recall, in part of your presentation to</p> <p>14 the committees, advising on what you understood to be</p> <p>15 any limitations on partisan gerrymandering?</p> <p>16 A. I believe so. I believe that the case law that</p> <p>17 I had reviewed at that time stated that there was not</p> <p>18 a bar to gerrymandering on partisan grounds, but there</p> <p>19 was on racial. But I can't remember exactly how it</p> <p>20 was presented.</p> <p>21 I knew that it was presented in some</p> <p>22 format, I believe, as one of the hot issues that were</p> <p>23 in this arena of law, and it may have even been in one</p> <p>24 of my predrafts, and I don't even recall if it made it</p> <p>25 to the final presentation.</p>

<p>Page 135</p> <p>1 Q. Okay. And I'm going to mark as Exhibit 4 a</p> <p>2 document identified as BLR-Byrd-FOIA-01626 to 1627.</p> <p>3 (Exhibit 4 marked for identification.)</p> <p>4 A. Yes.</p> <p>5 Q. Do you recognize this chain?</p> <p>6 I'm acknowledging that you were not</p> <p>7 copied on it, but do you -- do you have any</p> <p>8 familiarity with it?</p> <p>9 A. I don't remember specifically this email. I</p> <p>10 remember Mr. Williams being a part of NCSL and their</p> <p>11 redistricting team.</p> <p>12 Q. And is it fair to say that Mr. Miller tells Ben</p> <p>13 Williams in this email exchange that Arkansas does not</p> <p>14 have specific of redistricting criteria?</p> <p>15 Do you see that correspondence?</p> <p>16 A. I do.</p> <p>17 Q. Okay. And is that consistent with what your</p> <p>18 familiarity is about Arkansas not having specific</p> <p>19 redistricting criteria?</p> <p>20 A. That's correct.</p> <p>21 Q. Did BLR organize any public hearings on the</p> <p>22 congressional line drawing process?</p> <p>23 A. Each of the committee meetings for congressional</p> <p>24 redistricting, as well as any committee meetings</p> <p>25 during the legislative session, are always public</p>	<p>Page 137</p> <p>1 THE WITNESS: Sounds good.</p> <p>2 (Recess from 11:53 a.m. to 12:41 p.m.)</p> <p>3 (BY MS. ADEN:)</p> <p>4 Q. I now want to walk us through some of the maps</p> <p>5 that I am aware were considered during the legislative</p> <p>6 process, congressional maps, and ask you some</p> <p>7 questions about those, please.</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. So I would like to mark as Exhibit 5 what</p> <p>10 are images of House Bill 1959, Bates-stamped</p> <p>11 BLR-CMA-181 to 187.</p> <p>12 A. Thank you.</p> <p>13 (Exhibit 5 marked for identification.)</p> <p>14 Q. Do you recognize these documents?</p> <p>15 A. I do.</p> <p>16 Q. Okay. What are they?</p> <p>17 A. These appear to be the committee exhibits that</p> <p>18 were put before the House State Agencies committee for</p> <p>19 House Bill 1959.</p> <p>20 Q. Okay. Did you help develop House Bill 1959?</p> <p>21 MR. TALLEY: Object to form.</p> <p>22 Go ahead.</p> <p>23 A. Yes. I am the sole bill drafter for</p> <p>24 congressional redistricting bills. So House Bill</p> <p>25 1959, if it has my initials at the bottom, I was the</p>
<p>Page 136</p> <p>1 meetings. So I don't know -- I consider each of those</p> <p>2 a public meeting, not a separate public meeting in an</p> <p>3 APA standard that's required outside of --</p> <p>4 MR. TALLEY: By APA, I think she means</p> <p>5 the Administrative Procedures Act.</p> <p>6 THE WITNESS: Yes. I apologize.</p> <p>7 (BY MS. ADEN:)</p> <p>8 Q. And you -- so you are not familiar with whether</p> <p>9 or not BLR hosted any forums in particular communities</p> <p>10 throughout Arkansas to collect information about how</p> <p>11 members of the public might want to develop</p> <p>12 congressional maps?</p> <p>13 A. BLR would not have hosted those. Every</p> <p>14 committee meeting is open to all members of the public</p> <p>15 and were allowed testimony at any committee meetings</p> <p>16 held.</p> <p>17 MS. ADEN: Okay. I'm going to turn to a</p> <p>18 new section. It's 11:53. I would advise</p> <p>19 that we break for a lunch before we dive</p> <p>20 into the next one, if that's okay with you,</p> <p>21 and then I can look at what I can streamline</p> <p>22 and then we can roll through on the other</p> <p>23 side of lunch.</p> <p>24 Does that work?</p> <p>25 MR. TALLEY: Sounds good.</p>	<p>Page 138</p> <p>1 legal bill drafter for that bill.</p> <p>2 Q. Did you help develop the maps that became the</p> <p>3 text of House Bill 1959?</p> <p>4 MR. TALLEY: Object to form.</p> <p>5 Go ahead.</p> <p>6 A. I honestly do not remember which of the bills I</p> <p>7 drew maps on versus which ones I do not, as an</p> <p>8 individual bill.</p> <p>9 Q. Do you remember -- looking at this set of</p> <p>10 documents, do you see that House Bill 1959 was</p> <p>11 proposed by Representative Speaks?</p> <p>12 A. Yes, I can see that from the document.</p> <p>13 Q. Okay. And do you recall working with</p> <p>14 Representative Speaks on any map drawing for congress</p> <p>15 this past cycle?</p> <p>16 MR. TALLEY: You can answer that "yes,"</p> <p>17 "no," "I don't remember."</p> <p>18 A. Yes.</p> <p>19 Q. But you are not sure, as you sit here today, as</p> <p>20 you're telling me whether it was this proposed map or</p> <p>21 some other?</p> <p>22 A. That's correct.</p> <p>23 Q. Okay.</p> <p>24 A. I do not recall the numbers when they are</p> <p>25 associated with the maps on it that was one that Lori</p>

<p style="text-align: right;">Page 139</p> <p>1 drew originally and then I drafted or if it was one 2 that I drew and then drafted from.</p> <p>3 MR. TALLEY: And just for our record, 4 I'm going to allow Ms. Davenport to reveal 5 whether or not she worked with particular 6 members on certain pieces of legislation 7 because her initials appear on that 8 legislation itself. So I'm taking the 9 position that that's in bounds.</p> <p>10 (BY MS. ADEN:)</p> <p>11 Q. And just to be clear for the record, based upon 12 your testimony earlier today, from what I understood, 13 you and/or Ms. Bowen may work with one or more 14 legislators on a particular congressional map, either 15 its original version or subsequent iterations of it; 16 is that fair?</p> <p>17 A. That is correct.</p> <p>18 Q. And that any map that is proposed, it's turned 19 into narrative for a bill that is considered by the 20 legislature; is that fair?</p> <p>21 A. That's correct.</p> <p>22 Q. And that you would have worked on the actual 23 text for every proposed congressional map considered 24 during this last cycle; is that fair?</p> <p>25 A. That's correct.</p>	<p style="text-align: right;">Page 141</p> <p>1 contributed to it based upon your records or the 2 legislators who worked on it; is that fair to say?</p> <p>3 MR. TALLEY: I'll object to the form, 4 and I think it's largely just the mechanics 5 of the way the question was asked because 6 I'm a little lost.</p> <p>7 A. And I'm a little --</p> <p>8 MR. TALLEY: I think I understand what 9 you're saying.</p> <p>10 A. I'm a little confused by what you're asking, 11 too. If you would break it down.</p> <p>12 I can definitely say -- I can't say that 13 there's written instructions anywhere, whether that be 14 in my -- because it may have occurred verbally for any 15 member's request. There was no specific way those 16 came in to be documented.</p> <p>17 So to that point of your question, I 18 can't say that those would be found on that computer 19 because there would be no written instructions, in 20 using that term.</p> <p>21 Q. If you worked on House Bill 1959, the map 22 drawing process of it -- because I understand you 23 worked on the text -- I would -- in order to 24 understand what decisions were made in order to 25 develop this map, either the legislator or any</p>
<p style="text-align: right;">Page 140</p> <p>1 Q. But it's not the case that you would have 2 necessarily worked on the actual map development for 3 every map that was proposed?</p> <p>4 A. That's exactly correct.</p> <p>5 Q. Okay. But as you sit here today, based upon 6 particular names of legislators associated with bills, 7 you may have some recollection, one way or the other, 8 about whether or not you worked with that legislator 9 on any map during the process?</p> <p>10 A. That's correct. I just cannot recall at this 11 point which map went with which bill and which one I 12 may have worked on or if Lori worked on that 13 particular map that got turned into that bill. I -- 14 it's just been too long, and I don't remember the 15 number of correspondence of which one I worked on.</p> <p>16 Q. And if you worked on HB1959, either in its near 17 final form or some earlier iterations of it, your work 18 would be reflected in the legal room computer; is that 19 fair to say?</p> <p>20 A. That's fair to say.</p> <p>21 Q. Okay. And if I wanted to understand what 22 instructions were given in order to design House 23 Bill -- what became House Bill 1959, I would need to 24 either speak with -- I would need -- either need to 25 have the ability to assess that from what you may have</p>	<p style="text-align: right;">Page 142</p> <p>1 legislators working on it would be able to tell me 2 that. Is that your -- is that fair to say?</p> <p>3 A. That is fair to say.</p> <p>4 Q. Okay. Or if you worked on it or Ms. Bowen 5 worked on it, you would be the source of information 6 and tell me why this map was designed the way it is; 7 is that fair to say?</p> <p>8 A. No, it's not. I would still not be able to tell 9 you why that map was designed that way. I could 10 simply tell you that those were the instructions given 11 to me by any legislator to end up with the result, as 12 that -- I would still not have an answer as to the 13 why.</p> <p>14 Q. But from your perspective, the why of why this 15 particular bill was designed is housed in one or more 16 legislators who worked on it; is that fair to say?</p> <p>17 A. I believe that would be fair to say.</p> <p>18 MR. TALLEY: And I'll note for our 19 record that Representative Speaks has 20 invoked the legislative privilege in this 21 case.</p> <p>22 (BY MS. ADEN:)</p> <p>23 Q. So just to drill down on that a little bit, if I 24 wanted to understand why certain counties were 25 included within Congressional District 2 in 1959, you</p>

Page 143	Page 145
<p>1 may have information about it, if you worked on it, 2 through instructions from a legislator; is that fair 3 to say? 4 A. I might. I cannot even recall what each 5 instruction was per each map. So there's no written 6 record of any instructions, unless it came in through 7 a specific requested email that would be recorded. 8 Q. But that's -- 9 A. But I can't -- I can't say that that's what 10 happened with any specific map. 11 Q. Would your underlying files, though, save 12 information about what data was used to develop a 13 particular map, for example? 14 A. I have no idea. I know that I would have 15 started with the autoBound, and I would have saved the 16 document as I created it and it ended up in its final 17 form. But I have no idea what data is saved along 18 with that file at that point. 19 Everything was based off the 2020 20 census, but anything else would just be saved as that 21 document. 22 Q. If you worked on HB1959, would the type of data 23 that you said you had available to you when you were 24 describing the mapmaking process generally be the type 25 of data you would have had available to you in drawing</p>	<p>1 A. I don't recall. 2 Q. Do you recall discussing HB1959 with anyone who 3 wasn't a legislator? 4 A. No. I would have only spoke about this map with 5 the requester. 6 Q. And to be clear, the requester could -- or could 7 have included more than Representative Speaks; is that 8 fair to say? 9 A. That's fair to say for all maps that I'm -- 10 MR. TALLEY: You can answer. 11 A. Yes, that's fair to say. 12 Q. Okay. I would like to mark as Exhibit 6 images 13 of HB1960, BLR-CMA-217 to 224, please. 14 (Exhibit 6 marked for identification.) 15 MR. TALLEY: While EJ's handing that 16 out, I will note for our record that I'm 17 allowing Leah to ask some of these questions 18 that are "yes" or "no" solely for the 19 purpose of exploring the contours of the 20 privilege claim. 21 Q. Do you recall working on HB1960, the map in its 22 original or any iterations of it? 23 A. I truly cannot remember which maps I worked on 24 with which members. I was drafting maps daily for 25 multiple people, so I just don't recall which ones I</p>
Page 144	Page 146
<p>1 1959? 2 MR. TALLEY: Object to form. 3 A. I'm very confused by your question. Again -- 4 MR. TALLEY: Well, if you're confused by 5 the question... 6 A. I'll let you reask. 7 MR. TALLEY: Reask it. 8 (BY MS. ADEN:) 9 Q. Is the type of data that you had available -- 10 you described earlier the type of data that was 11 available to you in autoBound, that you used when you 12 were developing maps; is that fair? 13 A. Yes. 14 Q. If you worked on 1959, either its original 15 iteration or any subsequent iterations of it, would 16 you have used the data that you earlier described you 17 had been using for the congressional mapmaking 18 process? 19 A. Yes, it would be the same data. 20 Q. Okay. Do you or -- did you or BLR produce any 21 demographic data associated with 1959? 22 A. I have no recollection whether we did or did 23 not. 24 Q. Okay. And do -- did you or BLR produce any 25 demographic data associated with HB1959?</p>	<p>1 drafted and which ones Lori drafted. 2 Q. Okay. Do you see that this map is associated 3 with Representative Ladyman? 4 A. I do. 5 Q. Okay. And do you recall working with 6 Representative Ladyman on any map -- any congressional 7 map for this past cycle? 8 A. I don't recall. I -- it's very difficult 9 because throughout my job I worked with so many 10 members on so many different projects. It's very 11 difficult to remember which ones I did and which ones 12 I didn't. 13 So I apologize. I do not recall if I 14 specifically was the bill -- the drafter on this 15 particular map or not. 16 Q. And if you were to have worked on HB1960, any 17 iterations of it, that information -- any information 18 you have about it could be stored on the legal room 19 computer where you worked on it? 20 A. That's correct. I would have saved each map 21 with their name on that computer, if that was -- if I 22 was the one who drafted it. 23 Q. And any information about what data you might 24 have available to you, would that also be on the 25 computer in the legal room where you would have worked</p>

<p>Page 147</p> <p>1 on it, if you worked on it?</p> <p>2 A. Again, any data would have been the census data</p> <p>3 that it was coming out of. I was simply working in</p> <p>4 autoBound on that computer. I wasn't working on any</p> <p>5 other data source. I was working on autoBound with</p> <p>6 the data that autoBound, that I described earlier,</p> <p>7 that it included. And then I would have saved that as</p> <p>8 a map file under that particular representative or</p> <p>9 senator's name.</p> <p>10 Q. And to under -- if you worked on this map, any</p> <p>11 iterations of it, any instructions or information that</p> <p>12 you would have been given to effectuate that map would</p> <p>13 have been given to you by one or more legislators</p> <p>14 working on that map; is that fair to say?</p> <p>15 A. Yes.</p> <p>16 Q. And as you sit here today, you cannot tell me,</p> <p>17 if you worked on this map, what reasons went into</p> <p>18 creating this map the way that it is because of</p> <p>19 counsel's instructions that this is subject to</p> <p>20 legislative privilege; is that fair to say?</p> <p>21 A. That's fair to say.</p> <p>22 Q. So if a member of the public, for example,</p> <p>23 wanted to know why particular counties were included</p> <p>24 in HB1960, as you sit here today, you, given the</p> <p>25 instruction of your counsel, are not able to describe</p>	<p>Page 149</p> <p>1 (BY MS. ADEN:)</p> <p>2 Q. If you worked on this map, is it your position</p> <p>3 that Representative Ladyman, or any other</p> <p>4 representative, would hold the information about why</p> <p>5 HB1960 was designed as it was designed?</p> <p>6 MR. TALLEY: I'm not trying to get in a</p> <p>7 wrestling match about this, but we kind of</p> <p>8 both, I think, know what this kind of line</p> <p>9 of questioning when it comes to intent is</p> <p>10 getting after.</p> <p>11 I'll object to the form of the question</p> <p>12 because it calls for speculation.</p> <p>13 And I think I'll just reiterate the same</p> <p>14 objection I made with the last question,</p> <p>15 incorporate that because the question</p> <p>16 suggests the answer that some intent was</p> <p>17 communicated to Ms. Davenport and that the</p> <p>18 map as drafted reflects some intent.</p> <p>19 So I'll instruct the witness not to</p> <p>20 answer based on legislative privilege.</p> <p>21 (BY MS. ADEN:)</p> <p>22 Q. And as you sit here today, you're unable to tell</p> <p>23 me whether or not you worked on this particular map,</p> <p>24 or iterations of it?</p> <p>25 A. That's correct.</p>
<p>Page 148</p> <p>1 what the rationales were for the inclusion of</p> <p>2 particular counties and particular districts in this</p> <p>3 proposed map; is that fair?</p> <p>4 A. It's fair to say under privilege. And I would</p> <p>5 not necessarily be privy to that information, even if</p> <p>6 it were not covered by privilege.</p> <p>7 Q. Because?</p> <p>8 A. Because that's the intent of the legislature.</p> <p>9 That was not something I was necessarily provided at</p> <p>10 any point during any of these processes. I was the</p> <p>11 scrivener to process their choice of what went where</p> <p>12 into the program and then to ensure it was in proper</p> <p>13 draft form. I had no way to know the intent of</p> <p>14 another party in that.</p> <p>15 Q. So Representative Ladyman, or anyone -- any</p> <p>16 other legislator who worked on it, would have the</p> <p>17 intent or would have the explanation for why this map</p> <p>18 appears the way that it is?</p> <p>19 MR. TALLEY: I'll object to the form.</p> <p>20 It's calling for speculation.</p> <p>21 I'll instruct the witness not to answer</p> <p>22 based on legislative privilege because the</p> <p>23 question, as posed, suggests that there was</p> <p>24 some intent communicated to Ms. Davenport</p> <p>25 with respect to a particular map.</p>	<p>Page 150</p> <p>1 Q. But had you worked on this particular map or any</p> <p>2 iterations of it, based upon your testimony, if I were</p> <p>3 to understand what reasons explain HB1960, it is your</p> <p>4 position that I need to talk to Representative</p> <p>5 Ladyman, or any other legislator who helped design</p> <p>6 HB1960?</p> <p>7 Reasons. I want to know the reasons for</p> <p>8 why HB1960 was designed the way that it was.</p> <p>9 Whatever the reason was, who could tell</p> <p>10 me that based upon your position as you sit here</p> <p>11 today?</p> <p>12 MR. TALLEY: And that statement has kind</p> <p>13 of two layers to it. I understand you want</p> <p>14 to know the reasons, and the position of the</p> <p>15 Bureau is that I have not been informed that</p> <p>16 any member of the General Assembly has</p> <p>17 waived legislative privilege in this case.</p> <p>18 The reasons for the map itself, the</p> <p>19 first layer of that statement, I think,</p> <p>20 plainly falls under legislative privilege</p> <p>21 and we've asserted that. It's the members'</p> <p>22 privilege. They hold that; they haven't</p> <p>23 waived it.</p> <p>24 The second part of that kind of</p> <p>25 statement, second layer of who would know</p>

<p>1 what information is where I am -- kind of 2 what I'm grappling with. 3 Sometimes, and I've let -- during this 4 deposition and yesterday, let you explore 5 that kind of information because that's how 6 a party assesses a privilege claim. They 7 get around the contours of it. Who has what 8 information is germane to the assessment of 9 the privilege claim. 10 But when it comes to the intent and 11 whether or not something reflects intent is 12 where it becomes a little muddy, and one of 13 the things I tried to do today and yesterday 14 is certainly make one thing very clear. 15 Nothing I'm doing with respect to my 16 instructions to the witness or the witness's 17 responses is designed in any way to waive a 18 claim of legislative privilege. I think we 19 both know that. I'm also not in the 20 business of obstructing depositions. I 21 don't like getting in fights with the court. 22 So the question as posed, I think if you 23 asked in a different way, I will let the 24 witness answer solely for the purpose of 25 enabling the plaintiffs to assess or</p>	<p>Page 151</p> <p>1 So I would not know if there's other 2 information that any person relied upon other than 3 telling me what county went in which district. 4 Q. But as you sit here today, the person or persons 5 who would be able to tell me why a particular county, 6 for example, was assigned to a particular district 7 under this proposal, it's your position that that is 8 housed in the information of Representative Ladyman or 9 any other representative who worked on this map? 10 MR. TALLEY: Object to form. 11 A. That's correct. 12 Q. Okay. And, frankly, in order for me to 13 understand, given your ability to recall today -- 14 there has been a length of time. 15 In order for me to be able to understand 16 what information is available about the development of 17 HB1960, some of that information is available on the 18 legal computer in the Bureau's office; is that fair to 19 say? 20 A. That's fair to say. The data that was -- the 21 dataset that was used to pull this map together, yes. 22 And then the saved file -- and, again, I'm not a 23 technical expert, but any data -- metadata that goes 24 with that would be saved with that is my 25 understanding.</p> <p>Page 153</p>
<p>1 determine who might have information that is 2 subject to a privilege claim. I'll leave it 3 at that. 4 (BY MS. ADEN:) 5 Q. From your position, Ms. Davenport, who would 6 know what data was available in the development of 7 HB1960? 8 MR. TALLEY: I will let the witness 9 answer that question. 10 A. I believe -- the concern I have is with the word 11 "data." I don't know what you mean by "what kind of 12 data." Are you talking about census data? 13 What are you meaning by what kind of 14 data that person would have? 15 Q. Who would know what information was used in 16 order to develop HB1960? 17 A. On a technical basis, the -- 18 Q. The map. 19 A. The map itself came out of autoBound, which was 20 using 2020 census data. As to any other information 21 held by any other party, I would have no idea of what 22 information that person may or may not have reviewed 23 outside of the data that I used to create this 24 particular four-cornered document of putting these 25 counties in these particular districts.</p> <p>Page 152</p>	<p>Page 154</p> <p>1 Q. And any of the thinking behind the development 2 of HB1960 would come from a particular legislator or 3 legislators who worked on the bill; is that fair to 4 say? 5 MR. TALLEY: Object to form. I'll let 6 the witness answer solely for the purpose of 7 exploring the contours of the privilege. 8 A. It would be speculation on my part, but that's 9 my understanding is I know I don't have it. I don't 10 know who else may have that information, but I do not. 11 Q. But were you not instructed to -- on particular 12 questions, you could tell me what was told to you by 13 particular legislators in the development of 14 particular maps that you are familiar with; is that 15 fair to say? 16 MR. TALLEY: Object to form. 17 A. Could you please rephrase that? 18 Q. You have the ability to tell me what you -- what 19 information you received as -- in order to implement 20 changes to particular pieces of legislation; is that 21 fair to say? 22 A. With the caveat of my memory probably would not 23 recall all of that information, unless there was an 24 email that gave me specific counties to put where. 25 I'm -- given the number of maps that I</p>

<p>Page 155</p> <p>1 drew and the number of bills that I drafted, I do not 2 recall specifics as to, even if I drew the map, much 3 less why certain counties were moved certain places. 4 So that's why my answer is: As I sit 5 here today, no, I'm not able to talk about specifics 6 on that, even without the privilege, because I do not 7 recall. 8 Q. But with emails that you may or may not have 9 saved in your files, that could help you recall what 10 work you did on particular maps in the development of 11 them during the congressional map drawing process? 12 A. Yes. 13 MR. TALLEY: Object. Form. 14 And I think for our record, I'm not 15 aware of any emails that were not saved or 16 removed or deleted. 17 (BY MS. ADEN:) 18 Q. Okay. I'd like to mark as Exhibit 7 -- 19 actually, before we go back to that, can I just direct 20 you to the last page of the Exhibit 6 that we were 21 looking at, which is BLR-CMA-00224. 22 A. Yes. 23 Q. Do you -- this document is entitled, "2020 24 Congressional Redistricting Changes By District." 25 Have you seen this document before?</p>	<p>Page 157</p> <p>1 But if it was introduced at a committee meeting, it 2 would have to have come from a legislator. 3 Q. But not BLR producing analyses like this to 4 support a legislator -- a legislator's testimony 5 during that process? 6 MR. TALLEY: Object to form. 7 Go ahead. 8 A. The only thing, again, that would be provided 9 would be not a -- in your terms you used the term 10 "support." No. We provide the factual data. How 11 it's used by a legislator is their option and choice, 12 but we would just provide -- again, I can't say that 13 we didn't provide the numbers that are there from an 14 autoBound report of some kind, and that is the type of 15 information that could have been provided. But a 16 narrative or support document is not what BLR does. 17 Q. And there's a section of this analysis that 18 says, "How does map meet redistricting criteria?" And 19 if you notice, the first one says "Compactness," and 20 there is some indication of whether this proposed bill 21 satisfies compactness or not. 22 Do you see that? 23 A. I do. 24 Q. Okay. Do you recall running any reports, 25 generating information that would help a legislator</p>
<p>Page 156</p> <p>1 A. I don't believe so. 2 Q. Do you re- -- 3 A. I don't remember. 4 Q. So do you recall working on this, on this 5 document? 6 A. No, I do not. 7 Q. Do you recall whether a sheet with information 8 about changes by district was something that you ever 9 developed with respect to any congressional map during 10 the redistricting process? 11 A. I don't recall drafting anything in this manner. 12 I may have drafted a report that provided some of 13 the -- or provided a report that came out of autoBound 14 that provided some of the numbers, but I did not, to 15 my recollection, work on anything that looked like 16 this document, or this document. 17 Q. Are you aware of whether BLR would have done an 18 analysis like this for any congressional map that it 19 worked on? 20 A. Not to my knowledge. 21 Q. So if something like this was developed, it was 22 likely a particular legislator who would do an 23 analysis of a particular map? 24 A. That would be -- again, it would be speculation 25 on my part, but I -- so I don't know who created it.</p>	<p>Page 158</p> <p>1 determine whether a map was compact or not? 2 A. I do not recall. 3 Q. But you do recall running -- autoBound having a 4 feature that would allow you to make an assessment of 5 whether or not a proposed map was contiguous, or had 6 districts within it that are contiguous? 7 A. I believe so, yes. 8 Q. And there is a column for preservation of 9 counties and other sub- -- other political divisions 10 here. 11 Do you recall generating data that would 12 allow a legislator to make an except -- make an 13 assessment of whether or not there is a preservation 14 of counties and other political subdivisions? 15 A. Yes. The map itself shows whether counties are 16 split or not, and precincts, as well as the bill draft 17 language clearly identifies if it's a county or 18 precinct. So that would be the case for every map. 19 Q. And "Avoiding pairing incumbents" below, would 20 you or BLR have done -- produced data that would allow 21 a legislator to make an assessment about whether 22 incumbents had been not paired? 23 A. Each map, if they asked for the incumbents' 24 addresses to be shown on the map, you will see on the 25 very first page it shows red circle dots. So that</p>

Page 159	Page 161
<p>1 information is incumbent in the map.</p> <p>2 Q. "Population deviation," here it says all</p> <p>3 districts are less than 1 percent deviation.</p> <p>4 So what information would you or BLR</p> <p>5 have given in order for a legislator to have made an</p> <p>6 assessment about population deviation?</p> <p>7 MR. TALLEY: Are you asking about the</p> <p>8 process generally?</p> <p>9 MS. ADEN: Generally.</p> <p>10 MR. TALLEY: I'll let the witness answer</p> <p>11 that.</p> <p>12 A. Page 4. Each time the autoBoundEDGE map of an</p> <p>13 individual district was printed or provided, it</p> <p>14 automatically had that information at the bottom of</p> <p>15 the map; the ideal population, the deviation, and the</p> <p>16 total population.</p> <p>17 Q. And here where it says, "All districts are less</p> <p>18 than 1 percent deviation," do you have any</p> <p>19 understanding of why this analysis is looking at</p> <p>20 whether or not districts are above or below 1 percent?</p> <p>21 A. No. That was information -- again, I cannot</p> <p>22 remember if that was just discussed at the NCSL</p> <p>23 conference that I attended or if it was something that</p> <p>24 I included in the PowerPoint presentation.</p> <p>25 There was a lot of discussion at the</p>	<p>1 he would comfortably come to me before Ms. Bowen</p> <p>2 because we -- I had filed multiple bills for him in</p> <p>3 the past.</p> <p>4 Q. And did you work with Senator Johnson in the</p> <p>5 legal room?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Did you work with any other legislator</p> <p>8 besides Senator Johnson on SB720?</p> <p>9 A. That I don't recall.</p> <p>10 Q. And did you work with any other member of BLR in</p> <p>11 developing the maps for SB720?</p> <p>12 A. I don't believe Lori was involved in that one,</p> <p>13 but I do not recall.</p> <p>14 Q. Do you know how long it took you to develop what</p> <p>15 became SB720?</p> <p>16 A. No idea.</p> <p>17 Q. Do you know what data was available to you in</p> <p>18 developing what became SB720?</p> <p>19 A. The information that I've already testified to</p> <p>20 as to being on autoBound.</p> <p>21 Q. And that would include the ticker at the bottom</p> <p>22 of the screen with at least the population data</p> <p>23 changing as you were making changes in the map?</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. Do you recall whether or not, with</p>
Page 160	Page 162
<p>1 NCSL conference and even the Red Book itself about a</p> <p>2 standard -- regularly accepted 1 percent deviation for</p> <p>3 congressional redistricting. It was not anything</p> <p>4 specific, but I have no idea, as to this specific</p> <p>5 document, why it was included.</p> <p>6 Q. And what about gerrymandering? There's a note</p> <p>7 that, "No new districts were drawn to give one map" --</p> <p>8 I'm sorry -- "to give one group or party an</p> <p>9 advantage."</p> <p>10 What information would you or BLR</p> <p>11 have -- be able to give to a legislator in order to</p> <p>12 make an assessment about gerrymandering?</p> <p>13 A. I have no idea of what information they are</p> <p>14 referencing there.</p> <p>15 Q. So now we are turning to Exhibit 7, which is a</p> <p>16 single image Bates-stamped BLR-CMA-00257.</p> <p>17 (Exhibit 7 marked for identification.)</p> <p>18 (BY MS. ADEN:)</p> <p>19 Q. Do you recall working on Senate Bill -- the map</p> <p>20 for Senate Bill 720?</p> <p>21 A. I do.</p> <p>22 Q. And why do you specifically recall working on</p> <p>23 this map?</p> <p>24 A. I worked with -- I worked with Senator Johnson</p> <p>25 regularly in State Agencies matters, and I knew that</p>	<p>1 respect to SB '20, you started from the 2011 benchmark</p> <p>2 map or you developed this map from scratch?</p> <p>3 MR. TALLEY: I'll instruct the witness</p> <p>4 not to answer that question based on</p> <p>5 legislative privilege.</p> <p>6 And I think you meant SB720.</p> <p>7 MS. ADEN: SB720.</p> <p>8 (BY MS. ADEN:)</p> <p>9 Q. Any information about the design of SB '20 you</p> <p>10 would have received from Senator Johnson; is that</p> <p>11 accurate?</p> <p>12 A. That's accurate.</p> <p>13 MR. TALLEY: And I think you meant</p> <p>14 SB720.</p> <p>15 MS. ADEN: SB720. Sorry.</p> <p>16 MR. TALLEY: You're fine.</p> <p>17 (BY MS. ADEN:)</p> <p>18 Q. And any work that you have saved associated with</p> <p>19 your efforts on SB720 would be stored in the legal</p> <p>20 computer; is that fair to say?</p> <p>21 A. That's fair to say, if there wasn't an email. I</p> <p>22 don't recall if there was an email associated, that</p> <p>23 would have been on my Bureau computer, not on the</p> <p>24 legal room computer. But I don't recall if there was</p> <p>25 one or not.</p>

<p>Page 163</p> <p>1 Q. Do you recall having any telephone conversations 2 about the development of SB720?</p> <p>3 A. I cannot recall if he contacted me by telephone, 4 email, or in person.</p> <p>5 Q. Do you recall whether or not there was -- there 6 were various iterations of SB720 before it was 7 introduced?</p> <p>8 A. I cannot recall.</p> <p>9 Q. Do you recall producing any demographic data 10 associated with SB720?</p> <p>11 A. I can't recall specifically.</p> <p>12 Q. Do you recall producing any specific racial 13 demographic data on SB '20?</p> <p>14 A. I cannot recall -- I want to go back one. When 15 you said demographic information, my apologies. I was 16 assuming you meant racial demographic.</p> <p>17 The demographic data that is provided on 18 all of the maps was provided for every map. The 19 district breakdowns were available to the members for 20 each map, and I don't know if they were transmitted to 21 Senator Johnson in this matter. It would be upon 22 their request, but that was available. We saved that 23 each time that we created a map.</p> <p>24 Q. And I'm looking back at Exhibit 6. So you're 25 referring to --</p>	<p>Page 165</p> <p>1 A. That's correct.</p> <p>2 Q. Okay. I would like to mark as Exhibit 8 images 3 of HB1961, BLR-CMA-234 to 235.</p> <p>4 And similar to yesterday, there is 5 attached to it -- one, two, three, four, five -- six 6 pages that are not Bates-stamped that I'd like to ask 7 you about.</p> <p>8 A. Thank you.</p> <p>9 (Exhibit 8 marked for identification.)</p> <p>10 MR. TALLEY: And just like I did 11 yesterday, I'll note that with respect to 12 this exhibit, the portion of it that is not 13 Bates-stamped was not produced by the Bureau 14 in this litigation. It appears, based on 15 the face of the document, to have 16 potentially come from GIS. And I am not 17 aware of Representative Whitaker, or any 18 other member of the General Assembly, having 19 waived legislative privilege in this case.</p> <p>20 (BY MS. ADEN:)</p> <p>21 Q. So do you recognize as CMA-234 to 235 to be 22 images of HB1961?</p> <p>23 A. I do.</p> <p>24 Q. Okay. Do you recall -- and do you see that 25 Representative Whitaker is associated with HB1961?</p>
<p>Page 164</p> <p>1 A. Yes.</p> <p>2 Q. -- for example, if you go to CMA-220, at the 3 bottom of District 1, there is a deviation percentage, 4 there is an ideal population number, and a total 5 population number.</p> <p>6 A. That's correct. The -- the data that's on 7 00220, 221, 222, and 223 were all part of the report 8 we ran initially for each map.</p> <p>9 Q. And that is generic demographic data, for lack of 10 a better expression, that would be included on 11 every map that was introduced into legislation?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. And so --</p> <p>14 A. With the exception of -- I believe the very 15 first map that was introduced was just the map. After 16 that, additional information was requested and so we 17 began providing that to each one.</p> <p>18 Q. And so then when I asked you about SB '20 -- 19 SB720 in particular and whether or not you -- separate 20 from these total population numbers, you recall 21 producing certain racial demographic data?</p> <p>22 A. No.</p> <p>23 Q. Because if that was requested, it would be 24 map-specific? It was not given as pro forma with 25 every map?</p>	<p>Page 166</p> <p>1 A. I do.</p> <p>2 Q. Do you recall working on HB1961?</p> <p>3 A. I do.</p> <p>4 Q. And why in particular do you recall working on 5 this map?</p> <p>6 A. There were --</p> <p>7 MR. TALLEY: I'll instruct the witness 8 not to share any communications with 9 Representative Whitaker or any request that 10 he made.</p> <p>11 And to the extent the question can be 12 answered simply as to why you have that 13 recollection similar to the last round of 14 questions with respect to Senator Johnson, I 15 will let the -- the witness answer.</p> <p>16 Do you understand that instruction?</p> <p>17 THE WITNESS: I do.</p> <p>18 A. There were formatting issues when I was working 19 on this map particularly that took me a long time to 20 work through and so it stuck in my mind as being early 21 in the process for me to work through those technical 22 issues.</p> <p>23 Q. Do you recall any other members of the BLR 24 working on HB1961?</p> <p>25 A. I can't recall if Ms. Bowen assisted me with</p>

<p>Page 167</p> <p>1 some of the technical problems I was having on that</p> <p>2 map or not.</p> <p>3 Q. And if you worked -- when you worked on HB1961,</p> <p>4 it would have been in the legal room?</p> <p>5 A. Yes.</p> <p>6 Q. And any files associated would be on email or in</p> <p>7 the computer?</p> <p>8 A. That's correct.</p> <p>9 Q. Okay. Do you recall what data was available to</p> <p>10 you on the screen as you were helping to develop</p> <p>11 HB1961?</p> <p>12 A. Not specifically. Other than I've referenced I</p> <p>13 know the population information was available, and the</p> <p>14 difficulty was working with the overlay of the street</p> <p>15 lines. That's why it stood out to me so hard, was for</p> <p>16 some reason we had difficulty getting those to not</p> <p>17 default as to on.</p> <p>18 Q. And any information about what you were directed</p> <p>19 to do with respect to helping to develop HB1961,</p> <p>20 Representative Whitaker would have information about</p> <p>21 that?</p> <p>22 A. It would be my speculation, but yes.</p> <p>23 Q. Do you recall working with any other legislator,</p> <p>24 besides Representative Whitaker, on 1961?</p> <p>25 A. I don't recall so.</p>	<p>Page 169</p> <p>1 demographic information like that included within it?</p> <p>2 A. I need you to be more -- have you be more</p> <p>3 specific on what reports you're referencing that I</p> <p>4 discussed earlier.</p> <p>5 Q. So earlier today, when we were looking at the</p> <p>6 chart, there were categories -- and I can go back to</p> <p>7 it.</p> <p>8 There were categories -- as Exhibit 3</p> <p>9 today.</p> <p>10 There were categories of reports</p> <p>11 generated, and I don't believe you could recall</p> <p>12 whether the specific names of those reports were ones</p> <p>13 you generated, but you generically understood that you</p> <p>14 had produced some forms of racial demographic data at</p> <p>15 the request of one or more legislators; is that</p> <p>16 accurate?</p> <p>17 A. That is correct.</p> <p>18 Q. Okay. And so I was wondering whether or not the</p> <p>19 type of demographic breakdown that you see in this GIS</p> <p>20 report is similar to, or not, the type of demographic</p> <p>21 data that you recall reporting on at least some maps?</p> <p>22 A. I do not recall providing anything this graphic</p> <p>23 of nature.</p> <p>24 Q. So can you describe to me what you mean by that?</p> <p>25 A. I believe it was a table with demographic</p>
<p>Page 168</p> <p>1 Q. Do you recall producing -- outside of the total</p> <p>2 population numbers for this map, do you recall</p> <p>3 producing any other reports for HB1961?</p> <p>4 A. I don't recall so.</p> <p>5 Q. So you're looking at the un-Bates-stamped</p> <p>6 six-page document that does have the Geographic</p> <p>7 Information Systems stamp at the top right of those</p> <p>8 pages.</p> <p>9 Are you familiar, generally, with the</p> <p>10 type of information included in these six pages?</p> <p>11 A. Generally, I believe I saw this type of report</p> <p>12 during my training and looking through the software.</p> <p>13 Q. Did you ever generate reports that looked like</p> <p>14 the type of information included in what you're</p> <p>15 seeing?</p> <p>16 A. I don't recall. I don't recall.</p> <p>17 Q. So if you look at the third page where it's</p> <p>18 focused on District 1. In the top right-hand corner,</p> <p>19 there's a box with racial demographics, Hawaii/Pacific</p> <p>20 Islander, Native American, Asian, African American,</p> <p>21 white.</p> <p>22 Do you see that?</p> <p>23 A. I do.</p> <p>24 Q. Okay. Do you recall if the reports that you</p> <p>25 earlier referenced generating from autoBoundEDGE had</p>	<p>Page 170</p> <p>1 information in more of a table format is what I</p> <p>2 recall. I don't recall -- again, I recall seeing</p> <p>3 something of this nature, but I do not recall being</p> <p>4 requested or providing that particular type of report</p> <p>5 or data.</p> <p>6 Q. Okay. When working on HB1961, do you recall</p> <p>7 having political data available to you?</p> <p>8 A. No.</p> <p>9 Q. Do you recall discussing this map with anyone</p> <p>10 who was not a legislator?</p> <p>11 A. No.</p> <p>12 Q. Okay. Are you aware that on October 6, 2021,</p> <p>13 the Senate State Agencies committee had a meeting?</p> <p>14 A. I don't recall that. I'm sure I was aware at</p> <p>15 the time.</p> <p>16 Q. And if you didn't attend that meeting in person,</p> <p>17 based upon your earlier testimony, is it fair to say</p> <p>18 that you may have looked at it through the virtual</p> <p>19 link that was available?</p> <p>20 A. That's correct, but I don't recall. I don't</p> <p>21 recall what was going on at that time and whether I</p> <p>22 was at the meeting or may have watched virtually.</p> <p>23 Q. Are you aware of a discussion about 2011</p> <p>24 population statistics, particular requests by Senator</p> <p>25 Rapert for the, quote, "Racial makeup of the 2011</p>

	Page 171		Page 173
1	map," end quote?	1	said verbally, there might not be a record. But, yes,
2	MR. TALLEY: As to whether or not the	2	anything that's recorded would be on the legal
3	witness knows about something that was said	3	computer or my emails.
4	or not said during that meeting of the State	4	Q. And if something was said to you by Senator
5	Agencies committee, I will let the witness	5	Hester related to how he wanted you to work on this
6	answer.	6	map, he would have that information; is that fair to
7	But don't share any specific	7	say?
8	member-related requests or anything that	8	A. Yes.
9	happened outside the contours of that	9	Q. Okay. Do you recall whether or not another
10	meeting.	10	legislator, besides Senator Hester, worked on SB721?
11	A. I vaguely remember at some point. I don't	11	A. I do not recall.
12	remember if it happened during that meeting. I knew	12	Q. And looking at the information that is part of
13	that requests for data came in at some point.	13	this exhibit, there appear to be the population data
14	Q. Do you recall working on that request for data?	14	reports that you identified as being pro forma for
15	A. I do not.	15	proposed maps in the legislative process; is that
16	Q. Do you recall whether BLR worked on that request	16	correct?
17	for data?	17	A. That's correct.
18	A. I believe we did.	18	Q. Okay. Do you recall producing any specific
19	Q. Okay. And do you recall which BLR staff members	19	racial demographic data associated with SB721?
20	worked on that request?	20	A. No.
21	A. I believe Ms. Bowen and Mr. Miller may have.	21	Q. Do you recall discussing this map with anyone
22	But, again, I -- I feel like we were in a special	22	who was not a legislator or the BLR staff?
23	session and I was working on other drafting bills, but	23	A. No.
24	I cannot recall specifically. I just know that that	24	Q. Could you tell me what redistricting principles
25	period of time was incredibly, incredibly busy. So I	25	explain SB721?
	Page 172		Page 174
1	don't remember who actually, but it would have been	1	A. No.
2	one of the three of us. But I don't recall being the	2	Q. Why not?
3	one to pull the information.	3	A. That wasn't my job or responsibility. That
4	Q. Okay. I would like to mark as Exhibit 9 images	4	was -- I was to record what the members would like the
5	of Senate Bill -- what became Senate Bill SB721,	5	map to look like. I was not involved with choosing
6	BLR-CMA-209 to 216.	6	the redistricting principles involved with making
7	A. Thank you.	7	those choices or with how I reported it.
8	(Exhibit 9 marked for identification.)	8	Q. And so if I wanted to know what redistricting
9	Q. Do you recognize these documents?	9	criteria explains SB721, if any, as you sit here
10	A. I recognize them as maps, but I cannot recall if	10	today, is Senator Hester the source of information for
11	I worked on this set or not.	11	that information?
12	Q. Do you recall work -- do you see that this	12	A. Yes.
13	Senate Bill, SB -- Senate Bill 721 is associated with	13	Q. Okay. I would like to mark as Exhibit 10 a
14	Senator Hester?	14	series of images of what became SB722. This is
15	A. Yes, I do.	15	BLR-CMA-250 to 256.
16	Q. And do you recall working with Senator Hester on	16	A. Thank you.
17	any congressional maps?	17	(Exhibit 10 marked for identification.)
18	A. I believe I did, but I just cannot recall	18	Q. Do you recognize these images?
19	specifically. I believe I worked on this one.	19	A. I recognize them. I cannot recall if I helped
20	Q. If you worked on this one, any records that you	20	prepare this one or not.
21	would have of the data and any other information	21	Q. Okay. And if you helped recall -- if you helped
22	available to you that you would save would be on the	22	prepare this map, any records of your work on it would
23	legal computer or potentially your emails for this	23	be on the legal computer or -- and/or in any emails?
24	map; is that fair to say?	24	A. That's correct.
25	A. That's fair to say. Again, if something was	25	Q. And if you were given information about how to

<p>1 prepare these images by Senator Clark, he would be the 2 source of information for that? 3 A. That's correct. 4 Q. Do you recall whether or not Senator Clark 5 worked with any other legislators on SB722? 6 A. I do not recall. 7 Q. Okay. And do you recall producing any other 8 reports, besides the population information contained 9 in these images? 10 A. No, I do not. 11 Q. I'm going to mark as Exhibit 11 what are images 12 of SB723, also associated with Senator Clark, 13 BLR-CMA-243 to 249. 14 A. Thank you. 15 (Exhibit 11 marked for identification.) 16 Q. Do you recall working on maps for SB723? 17 A. Again, I can't recall specifically if I worked 18 on all the maps for Senator Clark or one or two, or if 19 we split that up. I do not recall. 20 Q. Okay. A similar question to before: Any work 21 product that you have preserved from your work on it 22 would be on the legal computer and/or your email? 23 A. That's correct. 24 Q. Okay. And any information that Senator Clark 25 would have wanted you to implement in order to design</p>	<p>Page 175</p> <p>1 particular maps? 2 A. Again, in the course of State Agencies work, I 3 worked a lot with Representative Dotson on other 4 legislation that had been introduced, and he was very 5 comfortable coming. That was typical in their process 6 to reach out to me for drafting with people who had 7 served on the State Agencies committee. 8 Q. Do you recall where you worked with 9 Representative Dot- -- or where you worked on images 10 of -- where you worked on HB1963 maps? 11 A. Absolutely. In the legal -- in the legal room 12 that had our mapping computer. 13 Q. And do you recall whether the information that 14 you received to help implement HB1963 you received in 15 person or otherwise? 16 A. It was in person. 17 Q. Do you recall receiving any emails about the 18 development of HB1963? 19 A. I don't recall any emails, but there may have 20 been some upon review of the map if I had not done 21 something correctly or implemented the information -- 22 inputted the information incorrectly. 23 Q. And do you recall whether or not your work on 24 HB1963 was a one-day thing or multiple days of work? 25 A. I do not recall. Typically at -- looking at the</p> <p>Page 177</p>
<p>1 SB723, he would hold that information? 2 A. That's correct. 3 Q. Okay. And do you recall whether or not, with 4 respect to SB723, any other legislators were involved 5 in the development? 6 A. I do not recall. 7 Q. Okay. I would like to mark as Exhibit 12 a 8 one-page document, BLR-CMA-342. This is a map of what 9 became Senate Bill 724. 10 (Exhibit 12 marked for identification.) 11 Q. It's identified as being proposed by Senator 12 Leding? 13 A. Yes. 14 Q. Do you recall working on this map? 15 A. I know I specifically did not work on this map. 16 Q. Okay. I would like to mark as Exhibit 13 images 17 of what is HB1963, BLR-CMA-284 to 290. 18 A. Thank you so much. 19 (Exhibit 13 marked for identification.) 20 Q. Do you recall working on maps for HB1963? 21 A. I do. 22 Q. Okay. And do you see that this -- these maps 23 are associated with Representative Dotson? 24 A. That's correct. 25 Q. Why do you recall working on this -- these</p> <p>Page 176</p>	<p>1 date of 9/20, I was moving really fast on maps at that 2 point. So I do not recall it being more than a one 3 day for the map. There may have been additional 4 days -- if it was turned into HB1963, it would have 5 taken additional time to draft the draft language. 6 Q. Do you recall if anyone else was in the room 7 with you and Representative Dotson working on HB1963 8 maps? 9 A. No, not that I recall. 10 Q. Do you recall producing racial demographic data 11 in the development of HB1963? 12 A. No. 13 Q. Do you recall producing any other reports 14 associated with HB1963? 15 A. No, I do not. 16 Q. Do you recall speaking with anyone who was a 17 nonlegislator or non-BLR staff about HB1963? 18 A. No, I do not. 19 Q. Do you recall what data was available to you as 20 you were working with Representative Dotson on HB1963? 21 A. And, again, are you referring to data on 22 autoBound? 23 Q. AutoBoundEDGE. 24 A. It was the same 2020 census data that I had 25 available for all of the bill drafting and map</p> <p>Page 178</p>

<p>1 drafting project.</p> <p>2 Q. Did you have any data other data, outside of</p> <p>3 autoBoundEDGE, when you were working on HB1963?</p> <p>4 A. Other than the information provided by</p> <p>5 Representative Dotson, no.</p> <p>6 Q. But it is -- in giving you information about how</p> <p>7 Representative Dotson wanted to develop HB1963, could</p> <p>8 he have given you other data that was available to you</p> <p>9 in preparing his -- in carrying out his aspirations?</p> <p>10 MR. TALLEY: I will let the witness</p> <p>11 answer that as a hypothetical. But as to</p> <p>12 any specific information shared by</p> <p>13 Representative Dotson, or other members of</p> <p>14 the legislature, I'll instruct the witness</p> <p>15 not to answer based on legislative</p> <p>16 privilege.</p> <p>17 Go ahead.</p> <p>18 MS. ADEN: Including factual data?</p> <p>19 MR. TALLEY: Well, I think we've got to</p> <p>20 cross the first bridge as to whether there</p> <p>21 was something else there. And then if</p> <p>22 there's a second question on the table, I</p> <p>23 think I would object at that time after</p> <p>24 hearing the question.</p> <p>25 A. I'm going to ask you to rephrase the question as</p>	<p>Page 179</p>	<p>1 MR. TALLEY: Same objection; same</p> <p>2 instruction.</p> <p>3 Q. Did you receive any data from Representative --</p> <p>4 or any information from Representative Dotson in</p> <p>5 developing HB1963 about which political boundaries to</p> <p>6 include or not include in any specific districts in</p> <p>7 developing HB1963?</p> <p>8 MR. TALLEY: As I understand that</p> <p>9 question, I will let her answer it.</p> <p>10 A. Absolutely. That was the whole point. The data</p> <p>11 was to determine what county goes in what district.</p> <p>12 So absolutely I received information as to where to</p> <p>13 put what county.</p> <p>14 Q. Okay. Did you receive information from</p> <p>15 Representative Dotson about which cities to include</p> <p>16 within particular districts under HB1963?</p> <p>17 MR. TALLEY: I'll object to that one on</p> <p>18 grounds of legislative privilege and</p> <p>19 instruct the witness not to answer.</p> <p>20 (BY MS. ADEN:)</p> <p>21 Q. Did you receive any data on specific -- on the</p> <p>22 makeup of specific precincts to include in any</p> <p>23 particular districts in developing HB1963?</p> <p>24 MR. TALLEY: Same objection; same</p> <p>25 instruction.</p>	<p>Page 181</p>
<p>1 what do you mean by "data" in that situation.</p> <p>2 Q. Outside of information on -- uploaded on</p> <p>3 autoBoundEDGE, which you explained earlier was --</p> <p>4 A. Correct.</p> <p>5 Q. -- the type of data that was available to it,</p> <p>6 did you receive any other data from Representative</p> <p>7 Dotson to develop HB1963?</p> <p>8 A. Yes.</p> <p>9 Q. Did you receive any racial data from</p> <p>10 Representative Dotson to develop HB1963?</p> <p>11 MR. TALLEY: Hang on. It's kind of like</p> <p>12 Friday today, so my wheels aren't spinning</p> <p>13 as fast as they usually do.</p> <p>14 I think that gets specific enough that I</p> <p>15 will instruct the witness not to answer</p> <p>16 based on legislative privilege.</p> <p>17 (BY MS. ADEN:)</p> <p>18 Q. Did you receive any political data or political</p> <p>19 performance data from Representative Dotson to develop</p> <p>20 HB1963?</p> <p>21 MR. TALLEY: Same objection; same</p> <p>22 instruction.</p> <p>23 (BY MS. ADEN:)</p> <p>24 Q. Did you receive any population data from</p> <p>25 Representative Dotson in developing HB1963?</p>	<p>Page 180</p>	<p>1 Q. Do you recall running any contiguity checks in</p> <p>2 developing HB1963?</p> <p>3 A. I do not recall that.</p> <p>4 Q. Do you recall doing any measures for compactness</p> <p>5 in developing HB1963?</p> <p>6 A. No, I do not.</p> <p>7 Q. Do you recall comparing HB1963 to the design of</p> <p>8 the 2011 enacted map in developing HB1963?</p> <p>9 A. No, I do not.</p> <p>10 Q. Do you recall whether you worked from scratch in</p> <p>11 developing HB1963?</p> <p>12 MR. TALLEY: I'll object and instruct</p> <p>13 the witness not to answer based on</p> <p>14 legislative privilege.</p> <p>15 (BY MS. ADEN:)</p> <p>16 Q. Do you recall assessing whether communities of</p> <p>17 interest, as defined by Representative Dotson, not</p> <p>18 telling me how he defined them, but do you recall</p> <p>19 making an assessment of communities of interest in</p> <p>20 developing HB1963?</p> <p>21 MR. TALLEY: Divide that one in two.</p> <p>22 Instruct the witness not to answer based</p> <p>23 on anything done in response to a legislator</p> <p>24 inquiry or request.</p> <p>25 As to whether you personally did some</p>	<p>Page 182</p>

Page 183	Page 185
<p>1 assessment in your own mind, the witness is</p> <p>2 free to answer.</p> <p>3 A. I made no assessment in any of the maps.</p> <p>4 Q. Did you use information about communities -- any</p> <p>5 communities of interest in developing HB1963?</p> <p>6 MR. TALLEY: I'll object to that</p> <p>7 question based on legislative privilege and</p> <p>8 instruct the witness not to answer.</p> <p>9 (BY MS. ADEN:)</p> <p>10 Q. Did you use any information from Dave's</p> <p>11 Redistricting in order to develop HB1963?</p> <p>12 MR. TALLEY: Same objection; same</p> <p>13 instruction.</p> <p>14 (BY MS. ADEN:)</p> <p>15 Q. I am going to mark as Exhibit 14 images of what</p> <p>16 has become House Bill 1964, BLR-CMA-275 to 283.</p> <p>17 A. Thank you.</p> <p>18 (Exhibit 14 marked for identification.)</p> <p>19 MR. TALLEY: Just for our record, just</p> <p>20 like I did yesterday, this map did not</p> <p>21 become HB1964. It is, instead, just a</p> <p>22 graphic representation of the bill's text.</p> <p>23 MS. ADEN: One day I'll get it right.</p> <p>24 MR. TALLEY: Just want to make sure that</p> <p>25 part is clear. Because it is kind of</p>	<p>1 A. That's Ms. Bowen, yes.</p> <p>2 Q. And do you recall whether another legislator,</p> <p>3 besides Representative Ray, worked on maps for HB1964?</p> <p>4 A. I don't recall anyone else.</p> <p>5 Q. Okay. Where did you work on maps for HB1964?</p> <p>6 A. In the legal room.</p> <p>7 Q. And any of your files related to this map would</p> <p>8 be on the computer or in email?</p> <p>9 A. That's correct.</p> <p>10 Q. Anywhere else?</p> <p>11 A. Not that I know of.</p> <p>12 Q. And any of the data available to autoBoundEDGE</p> <p>13 that was available to you in working on maps for</p> <p>14 HB1964 would be in those files, either the computer or</p> <p>15 the email?</p> <p>16 A. That's correct.</p> <p>17 Q. And did you also receive information about how</p> <p>18 to design HB1964 from Representative Ray in person?</p> <p>19 A. I believe so, yes.</p> <p>20 Q. Okay. And was anyone in the room with you when</p> <p>21 you received information from Representative Ray about</p> <p>22 the design?</p> <p>23 A. Not that I recall.</p> <p>24 Q. Do -- outside of the data on the autoBoundEDGE</p> <p>25 software, did you receive other data, geographic data</p>
Page 184	Page 186
<p>1 confusing.</p> <p>2 MS. ADEN: One day I'll get it right.</p> <p>3 MR. TALLEY: Because all we want to do</p> <p>4 is look at the maps because the language of</p> <p>5 the actual bill is something that only</p> <p>6 Ms. Davenport can probably understand.</p> <p>7 (BY MS. ADEN:)</p> <p>8 Q. Are you familiar with graphic representations of</p> <p>9 what becomes HB1964?</p> <p>10 A. I am. And for further clarity, these were</p> <p>11 introduced at the committee level but were not part of</p> <p>12 the bills. That's why they have the HB number at the</p> <p>13 top is they were to correspond with the bills, but</p> <p>14 were introduced as exhibits at the committee meetings.</p> <p>15 Q. Because the bills are text?</p> <p>16 A. That's correct.</p> <p>17 Q. Okay. Why do you recall working on these</p> <p>18 graphic images?</p> <p>19 A. Again, there were certain members that I worked</p> <p>20 with frequently on legislation, and they would</p> <p>21 naturally come to me as the bill drafter rather than</p> <p>22 seeking out our research analyst, who they may not</p> <p>23 have worked with as often in the past. And I recall</p> <p>24 working with Representative Ray.</p> <p>25 Q. And by research analyst, is that Ms. Bowen?</p>	<p>1 or population data, from Representative Ray in</p> <p>2 developing these maps?</p> <p>3 A. Not that I recall.</p> <p>4 Q. Do you recall producing any racial demographic</p> <p>5 information for Representative Ray in developing</p> <p>6 HB1964?</p> <p>7 A. No, I did not.</p> <p>8 Q. Do you recall producing -- do you recall having</p> <p>9 any political performance data in the development of</p> <p>10 HB1964?</p> <p>11 A. I did not.</p> <p>12 THE WITNESS: Sorry.</p> <p>13 MR. TALLEY: That's okay. I'll go ahead</p> <p>14 and go back and instruct the witness not to</p> <p>15 answer, privilege grounds.</p> <p>16 Q. Do you --</p> <p>17 MR. TALLEY: I'll try to be -- I just</p> <p>18 want our record to reflect I'm trying to be</p> <p>19 consistent with these objections.</p> <p>20 THE WITNESS: Sorry.</p> <p>21 (BY MS. ADEN:)</p> <p>22 Q. Do you recall speaking with anyone who was not a</p> <p>23 legislator or BLR staff about maps for HB1964?</p> <p>24 A. No, I do not.</p> <p>25 Q. Okay. Let's mark as Exhibit 15 images --</p>

<p>1 graphic representations of what would become SB725, 2 BLR-CMA-291 to 299. 3 A. Thank you. 4 (Exhibit 15 marked for identification.) 5 Q. Do you recall working on maps for SB725? 6 A. I do. 7 Q. And do you see that this bill is associated with 8 Senator Davis? 9 A. I do. 10 Q. Okay. And do you recall working on this 11 specific bill because of Senator Davis's relationship 12 with you? 13 A. I do. As well as there's some additional pages 14 showing zoomed in areas, and I performed that action. 15 I remember doing that. 16 Q. For these particular maps or in general when -- 17 A. For these particular maps. 18 Q. Gotcha. 19 Okay. And where would you have worked 20 on map -- on graphic representations of -- for SB725? 21 A. In the legal room. 22 Q. Okay. And how would you have received 23 information about how Senator Davis would have wanted 24 this map to look like? 25 A. I know she stopped by in person. I can't</p>	<p>Page 187</p> <p>1 a piece of legislation, but I am drawing the 2 line as to what kind of data, or data, was 3 provided to Ms. Davenport with respect to 4 any particular piece of legislation. 5 (BY MS. ADEN:) 6 Q. So for SB725, Ms. Davenport, you had data 7 available on autoBoundEDGE; is that correct? 8 A. That's correct. 9 Q. But you are representing to me today that you 10 also received additional data from Senator Davis in 11 the development of SB725? 12 MR. TALLEY: Object to form. 13 (BY MS. ADEN:) 14 Q. Did you receive additional data outside of 15 autoBoundEDGE from Senator Davis in developing maps 16 for SB725? 17 A. I received additional data in the form of where 18 they would like for me to place things on every single 19 map. So to the extent you're asking for did I receive 20 instruction as to where to put counties, yes. I made 21 no independent judgment. 22 So if you consider that the data, yes, I 23 received instruction from each member as to what 24 county or precinct they wanted in what district. 25 Q. For every map that you worked on?</p> <p>Page 189</p>
<p>1 remember if there was an email associated as well. 2 Q. Okay. Do you recall producing any racial data 3 associated with maps for SB725? 4 A. I did not. 5 Q. And the data that was available to you that 6 you'd been using on autoBoundEDGE, would that have 7 been the data that would have been available to you on 8 autoBoundEDGE for preparing these images for SB725? 9 A. Yes. 10 Q. Do you recall receiving any other data from 11 representative -- Senator Davis in order to prepare 12 SB725? 13 A. I do not recall. 14 Q. Do you recall receiving any electoral data in 15 order to develop maps for SB725? 16 MR. TALLEY: I'll instruct the witness 17 not to answer based on legislative 18 privilege. 19 MS. ADEN: So it's your position that 20 even data, election data, which is a matter 21 of fact, that that is protected by 22 legislative privilege? 23 MR. TALLEY: I have allowed the 24 questions as to whether a member provided 25 additional data, period, in connection with</p> <p>Page 188</p>	<p>1 A. For every single map. 2 Q. And then with respect to this particular map, 3 did you receive electoral-related data in order to 4 develop SB725? 5 MR. TALLEY: I'll object on legislative 6 privilege grounds and instruct the witness 7 not to answer. 8 And I'm trying to be consistent. Just, 9 that's where I'm drawing the line is what 10 was the nature of the information provided 11 beyond what was available generally in 12 autoBound and, of course, she has to get 13 some instruction or information as to how to 14 draw a map from a member. 15 So that just kind of general instruction 16 of what that might be applied universally 17 across these maps is also common sense. But 18 as to anything further than that particular 19 data, whether it's political, population, 20 racial data, education, whatever it might 21 be, that's where I will draw the line on the 22 privilege. 23 (BY MS. ADEN:) 24 Q. And just to be clear with respect to preparation 25 of maps for SB725, any additional information outside</p> <p>Page 190</p>

<p style="text-align: right;">Page 191</p> <p>1 of autoBoundEDGE that you would have received from</p> <p>2 Senator Davis, that would be saved because you would</p> <p>3 have loaded into -- you would have used it -- well,</p> <p>4 would that be on the legal computer and/or in your</p> <p>5 email?</p> <p>6 A. Again, I'm going to clarify because you're</p> <p>7 talking about something that I imported. I did not</p> <p>8 import something. I used the base of autoBound and</p> <p>9 then would add data as directed by a member. I was</p> <p>10 not ever importing anything into the autoBound system.</p> <p>11 Q. But if you were given data that was not already</p> <p>12 available in the autoBound system, such as political</p> <p>13 data, would that have been told to you verbally, or</p> <p>14 would you have been given data inputs in order to add</p> <p>15 into your computer system to develop a map?</p> <p>16 MR. TALLEY: You can answer that as to</p> <p>17 the means --</p> <p>18 (BY MS. ADEN:)</p> <p>19 Q. Generally.</p> <p>20 MR. TALLEY: -- that information might</p> <p>21 have been communicated to you.</p> <p>22 A. I have --</p> <p>23 MR. TALLEY: Verbally, in writing,</p> <p>24 however provided.</p> <p>25 A. I have no idea how to import any kind of</p>	<p style="text-align: right;">Page 193</p> <p>1 entitled. And if you know the identity of</p> <p>2 that person, I will let you reveal it.</p> <p>3 If -- but what I don't want you to do is</p> <p>4 disclose the communication itself. So I'll</p> <p>5 instruct the witness to keep this answer</p> <p>6 simple, to the extent you can, because of</p> <p>7 the privilege.</p> <p>8 A. Senator Davis received a phone call while I was</p> <p>9 drafting the map that was put on speaker, and I</p> <p>10 believe there was a question asked about population.</p> <p>11 I do not know who the person was on the other side of</p> <p>12 the phone, and --</p> <p>13 MR. TALLEY: And I'll stop you there.</p> <p>14 (BY MS. ADEN:)</p> <p>15 Q. But with respect to that conversation, was it</p> <p>16 just you and Senator Davis in the room?</p> <p>17 A. Yes.</p> <p>18 Q. So the only person who would know who that</p> <p>19 person was talking about SB725 or maps of it would be</p> <p>20 Senator Davis?</p> <p>21 A. That's correct.</p> <p>22 Q. And that person did not identify their</p> <p>23 affiliation or name?</p> <p>24 A. Not that I can recall.</p> <p>25 Q. Okay. And is there any record in any of the --</p>
<p style="text-align: right;">Page 192</p> <p>1 political data into the system. I was simply taking</p> <p>2 precinct and county levels and moving them between the</p> <p>3 districts. I was not importing or changing any other</p> <p>4 kind of data in the system. So I would never have had</p> <p>5 to import any type of racial data, partisan data,</p> <p>6 electoral data, anything of that nature into the</p> <p>7 system. I was not inputting any of that in. I was</p> <p>8 simply moving the lines of the districts.</p> <p>9 Q. Okay. Do you recall -- just to wrap this up --</p> <p>10 talking to anyone who was not a legislator or BLR</p> <p>11 staff about maps for SB725?</p> <p>12 A. Yes.</p> <p>13 Q. Who?</p> <p>14 A. I don't recall the name.</p> <p>15 Q. Do you recall whether or not this was a member</p> <p>16 of the public?</p> <p>17 A. I do not know.</p> <p>18 Q. Why do you recall that you spoke to a</p> <p>19 nonlegislator or non-BLR staff member with respect to</p> <p>20 this particular map?</p> <p>21 MR. TALLEY: The instruction I'm going</p> <p>22 to offer the witness is to keep it simple</p> <p>23 because I think the question, as posed, is</p> <p>24 exploring the contours of a privilege, and</p> <p>25 it's in bounds, but -- as Leah, I think, is</p>	<p style="text-align: right;">Page 194</p> <p>1 your computer or email of who that person might be</p> <p>2 that was on the phone?</p> <p>3 A. No, ma'am.</p> <p>4 Q. And do you recall whether that person's question</p> <p>5 was about total population data or some other specific</p> <p>6 data point?</p> <p>7 A. I --</p> <p>8 MR. TALLEY: Object and instruct the</p> <p>9 witness not to answer that question.</p> <p>10 And the reason for it is that nonparty,</p> <p>11 based on your responses, was within --</p> <p>12 acting within the sphere of legislative</p> <p>13 activity.</p> <p>14 (BY MS. ADEN:)</p> <p>15 Q. Do you recall working on any map where you were</p> <p>16 on the phone with anyone else who was not a legislator</p> <p>17 or other BLR staff as you were developing any</p> <p>18 congressional map?</p> <p>19 A. No.</p> <p>20 Q. Okay. I would like to mark as Exhibit 16 --</p> <p>21 how's everybody doing? Including Ms. Hayden.</p> <p>22 THE COURT REPORTER: I'm okay.</p> <p>23 MS. ADEN: And please, Ms. Davenport,</p> <p>24 let me know if there's a breaking point.</p> <p>25 THE WITNESS: I will.</p>

<p>Page 195</p> <p>1 MS. ADEN: And Ms. Hayden. Plugging</p> <p>2 through because I know everyone is --</p> <p>3 (BY MS. ADEN:)</p> <p>4 Q. Okay. This is graphic representations of</p> <p>5 HB1965, BLR-CMA-316 to 323.</p> <p>6 Do you recognize these images?</p> <p>7 A. I do.</p> <p>8 Q. Do you recall work -- and are these -- was</p> <p>9 HB1965 proposed by Representative Flowers?</p> <p>10 A. Yes, to the best of my recollection.</p> <p>11 Q. And do you recall working with</p> <p>12 Representative Flowers on maps for HB1965?</p> <p>13 A. I remember working with Representative Flowers.</p> <p>14 I can't remember if Ms. Bowen may have started the map</p> <p>15 and then I came in, but I do remember working with</p> <p>16 Representative Flowers on the maps.</p> <p>17 Q. So this would have been an example of a map</p> <p>18 where both you and Ms. Bowen worked on an original</p> <p>19 and/or various iterations of a map?</p> <p>20 A. Potentially, I cannot remember. Or if it was</p> <p>21 one of those that Representative Flowers reached out</p> <p>22 to Lori and she said, "I think Michelle's available."</p> <p>23 I just can't remember. I feel like there was</p> <p>24 something there with contact between the two of us.</p> <p>25 Q. Do you recall whether anyone besides</p>	<p>Page 197</p> <p>1 there.</p> <p>2 THE WITNESS: Okay.</p> <p>3 (BY MS. ADEN:)</p> <p>4 Q. And do you recall responding to that request?</p> <p>5 A. Yes.</p> <p>6 Q. And do you recall whether or not you shared that</p> <p>7 information with anyone else, besides</p> <p>8 Representative Flowers?</p> <p>9 A. I cannot recall if she authorized that</p> <p>10 information to be shared with someone else or not.</p> <p>11 Q. And was that someone else a legislator?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 A. But I cannot recall if she did or not.</p> <p>15 Q. And the information that you would have shared,</p> <p>16 would that have been produced through autoBoundEDGE?</p> <p>17 A. Yes. As well as an email.</p> <p>18 Q. But to respond to that request, the racial data</p> <p>19 that you would have pulled, was that from</p> <p>20 autoBoundEDGE?</p> <p>21 A. Yes.</p> <p>22 Q. In working on whatever iteration of HB1965 that</p> <p>23 you may have been -- that you may have worked on, you</p> <p>24 would have used the autoBoundEDGE software; is that</p> <p>25 fair to say?</p>
<p>Page 196</p> <p>1 Representative Flowers and you and/or Ms. Bowen worked</p> <p>2 on images for House Bill 1965?</p> <p>3 A. I don't believe on this bill, no.</p> <p>4 Q. Okay. If you worked on HB1965, maps for it,</p> <p>5 this would have been done in the legal room?</p> <p>6 A. Yes.</p> <p>7 Q. And do you recall whether any work you would</p> <p>8 have done on it was through email guidance and/or in</p> <p>9 person or telephone?</p> <p>10 A. I believe we had in-person meeting. There may</p> <p>11 be emails related to this as well.</p> <p>12 Q. And do you recall whether other legislators were</p> <p>13 involved in the development of this map?</p> <p>14 A. I cannot recall.</p> <p>15 Q. Do you recall producing any demographic reports,</p> <p>16 besides the population figures that were reported on</p> <p>17 these images, for these maps?</p> <p>18 A. I believe so. I cannot remember if it was for</p> <p>19 this particular map.</p> <p>20 Q. And what type of reports are you thinking of</p> <p>21 when you are recalling that you may have produced</p> <p>22 them?</p> <p>23 A. There were some racial demographic reports</p> <p>24 requested by Representative Flowers.</p> <p>25 MR. TALLEY: I'll stop -- stop you</p>	<p>Page 198</p> <p>1 A. That's correct.</p> <p>2 Q. And the data that you had available on</p> <p>3 autoBoundEDGE would have been the data available to</p> <p>4 you to develop this images -- maps for HB1965?</p> <p>5 A. That's correct.</p> <p>6 Q. And if I wanted to understand what consideration</p> <p>7 Representative Flowers had in designing 1965 that she</p> <p>8 would have shared with you, I would need to talk to</p> <p>9 Representative Flowers?</p> <p>10 A. That's correct.</p> <p>11 Q. Okay. Let us -- I cannot remember if I asked</p> <p>12 this, so I'm going to ask again.</p> <p>13 Is this -- HB1965 and the maps that you</p> <p>14 worked on, did you discuss them with anyone who was</p> <p>15 not a legislator or BLR staff?</p> <p>16 A. No.</p> <p>17 Q. Okay. Let's mark as Exhibit 17 images --</p> <p>18 graphic representations of what becomes SB726,</p> <p>19 BLR-CMA-425 to 431.</p> <p>20 (Exhibit 17 marked for identification.)</p> <p>21 Q. Do you recognize these images?</p> <p>22 A. Yes. I recognize them as being legislative</p> <p>23 drafting maps. I don't recall explicitly which maps</p> <p>24 are -- were done at which time. But in general, yes.</p> <p>25 Q. And this SB726 is associated with Senator Davis?</p>

Page 199	Page 201
<p>1 A. That's correct.</p> <p>2 Q. And is this an occasion where you're not sure if</p> <p>3 you worked on these particular maps because you worked</p> <p>4 on maps for Senator Davis during the process?</p> <p>5 A. I believe I drafted all the maps for Senator</p> <p>6 Davis.</p> <p>7 Q. Okay. And in drafting maps for Senator Davis,</p> <p>8 this would have been done on her behalf inside of the</p> <p>9 legal room?</p> <p>10 A. That's correct.</p> <p>11 Q. Okay. Do you recall receiving any population</p> <p>12 data besides what was available in autoBoundEDGE in</p> <p>13 developing SB726 --</p> <p>14 MR. TALLEY: I'll object.</p> <p>15 (BY MS. ADEN:)</p> <p>16 Q. Maps for SB726.</p> <p>17 MR. TALLEY: I'll object and instruct</p> <p>18 the witness not to answer.</p> <p>19 Q. If you have received any additional data not in</p> <p>20 autoBoundEDGE in the development of SB726, would that</p> <p>21 be on -- have been emailed to you or available on your</p> <p>22 legal computer for preservation purposes?</p> <p>23 A. It would have been by email or verbally, if</p> <p>24 information was transmitted that way.</p> <p>25 Q. So just so I'm understanding this better, is it</p>	<p>going, was if information of that sort was</p> <p>provided by some member during this process,</p> <p>how would it have been communicated.</p> <p>I would let the witness answer that</p> <p>question, and if there was a follow-up</p> <p>question as to whether, for example, like a</p> <p>sheet of paper was handed to Ms. Davenport</p> <p>during that process, if it was saved.</p> <p>Because I think that would be getting at the</p> <p>discoverability or assessment of whether a</p> <p>document exists would be the subject of a</p> <p>privilege claim.</p> <p>As to whether or not particular types of</p> <p>information were shared with respect to a</p> <p>particular piece of legislation for Senator</p> <p>Breanne Davis, or some other member, I would</p> <p>object and say that that's privileged, so...</p> <p>(BY MS. ADEN:)</p> <p>Q. So stepping back. Outside of what was available</p> <p>to you on autoBoundEDGE during the development of</p> <p>congressional maps, was data or data points provided</p> <p>to you by any legislator in that process?</p> <p>MR. TALLEY: I will let her answer that</p> <p>question "yes," "no," "I don't know."</p> <p>THE WITNESS: I don't think I can answer</p>
Page 200	Page 202
<p>1 possible that a representative said -- came in to you</p> <p>2 with data points like, "Here's the total population</p> <p>3 for this particular county; therefore, I want you to</p> <p>4 put it in this particular district"?</p> <p>5 Did that happen to you on occasion or --</p> <p>6 strike that. It's totally out there.</p> <p>7 MR. TALLEY: There's just two sides to</p> <p>8 it. The hypothetical I'll let her answer.</p> <p>9 As to whether something like that actually</p> <p>10 happened, I think that would be privileged,</p> <p>11 so...</p> <p>12 (BY MS. ADEN:)</p> <p>13 Q. I'm just trying to understand whether or not, in</p> <p>14 working on any of these, there was other data besides</p> <p>15 what was loaded on autoBoundEDGE. And by "data," I'm</p> <p>16 talking about population figures, not information</p> <p>17 generally. I understand that you are being guided and</p> <p>18 "I want these counties in this particular district or</p> <p>19 these precincts in this particular district," but I'm</p> <p>20 trying to understand if you were given other sources</p> <p>21 of data outside autoBoundEDGE in the development of</p> <p>22 SB726 or some other map.</p> <p>23 MR. TALLEY: I think that they are --</p> <p>24 based on this back and forth, kind of the</p> <p>25 predicate question was, or where it was</p>	<p>that in a "yes," "no," or "I don't know"</p> <p>fashion.</p> <p>MR. TALLEY: Then I'll instruct you to</p> <p>answer it without divulging any privilege</p> <p>and without respect to any particular piece</p> <p>of legislation or member.</p> <p>THE WITNESS: Perfect.</p> <p>A. The information I was asking for and receiving</p> <p>was limited to what county or what precinct goes in</p> <p>which district. I was not looking -- in drafting</p> <p>these maps, my job was solely that. It was not to do</p> <p>any data analysis. It was data solely related to</p> <p>counties in what district, or precincts in what</p> <p>districts, where the lines were going to be.</p> <p>MR. TALLEY: And I'll stop you there.</p> <p>(BY MS. ADEN:)</p> <p>Q. And to receive information about what county or</p> <p>what precincts go in any particular district, will you</p> <p>give me the means by which you would have received</p> <p>that information?</p> <p>A. Yes. I was verbally given. I may have been</p> <p>shown information on a other piece of paper that was</p> <p>retained or left on the desk, and if it was, it was</p> <p>put in, you know, kind of a file when I was putting</p> <p>those together, or it would have been by email. It</p>

Page 203	Page 205
<p>1 may have been by telephone when I say verbally, either</p> <p>2 verbal or in person.</p> <p>3 Q. And you could have received information that way</p> <p>4 through multiple means for a particular mapmaking</p> <p>5 process?</p> <p>6 A. That's correct. On a hypothetical basis, I</p> <p>7 could have received an email directing me to create a</p> <p>8 map with the counties in this distribution and then</p> <p>9 received a phone call, "I've changed my mind. See</p> <p>10 what it would look like if you change these two</p> <p>11 counties."</p> <p>12 And then I might have had the same</p> <p>13 member stop in and say, "You know what? I changed my</p> <p>14 mind again. I want to move this over here."</p> <p>15 So the same map may have had multiple</p> <p>16 ways that I was told how to put a county or a precinct</p> <p>17 into a certain district.</p> <p>18 Q. And it's your position you just implemented</p> <p>19 those -- those directions, that instruction and no</p> <p>20 more?</p> <p>21 A. That is absolutely correct.</p> <p>22 Q. And in this generic process that you're</p> <p>23 describing about how you would have received</p> <p>24 information, I think what I just want to understand</p> <p>25 is: Outside of the census population information and</p>	<p>1 would be the source of information for who that person</p> <p>2 was on the phone call?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. Let's mark as Exhibit 18. These are</p> <p>5 graphic representations of SB727, BLR-CMA-328 to 334.</p> <p>6 (Exhibit 18 marked for identification.)</p> <p>7 Q. Do you recall working on maps for SB727?</p> <p>8 A. I do.</p> <p>9 Q. And SB727 was proposed by Senator Tucker?</p> <p>10 A. That's correct.</p> <p>11 Q. And do you recall working on this specific map</p> <p>12 for SB727, or generally working with Senator Tucker on</p> <p>13 congressional mapmaking?</p> <p>14 A. Generally working with Senator Tucker on</p> <p>15 congressional mapmaking.</p> <p>16 Q. And if you worked in the development of the</p> <p>17 original or any iterations of maps for SB727, this</p> <p>18 information would be on your computer and/or emails?</p> <p>19 A. That's correct.</p> <p>20 Q. Do you recall talking with anyone else, besides</p> <p>21 Senator Tucker, in the development of Senate Bill 727?</p> <p>22 A. Yes.</p> <p>23 Q. Anyone who was -- are the other people that you</p> <p>24 are thinking about legislators?</p> <p>25 A. Yes.</p>
Page 204	Page 206
<p>1 the geographies that were in autoBoundEDGE, whether at</p> <p>2 any point in time you received another data source in</p> <p>3 order to make decisions about whether -- or where a</p> <p>4 county or precinct would be?</p> <p>5 A. Two parts to that question. I did not make any</p> <p>6 decisions about whether those -- where those counties</p> <p>7 or precincts went.</p> <p>8 And to my knowledge, no, I did not</p> <p>9 receive another data source, other than what I've</p> <p>10 described, as to tell me put this county, this</p> <p>11 precinct in this district.</p> <p>12 Q. Using the information on autoBoundEDGE?</p> <p>13 A. That is correct.</p> <p>14 Q. Okay. With respect to SB -- maps for SB726, do</p> <p>15 you recall producing any specific racial information</p> <p>16 associated with these maps?</p> <p>17 A. No, I did not.</p> <p>18 Q. Okay. And do you recall speaking with anyone</p> <p>19 who was not a legislator or other BLR staff about</p> <p>20 SB726?</p> <p>21 A. Not specifically. And, again, between 725 and</p> <p>22 726, I don't recall during which of those map</p> <p>23 processes that phone call occurred.</p> <p>24 Q. So it could have been brought when you were</p> <p>25 developing either one of these maps and Senator Davis</p>	<p>1 Q. Do you recall talking to nonlegislators about</p> <p>2 SB727?</p> <p>3 A. No.</p> <p>4 Q. And when having those conversations with</p> <p>5 Senator Tucker and/or other legislators, were those</p> <p>6 in-person conversations?</p> <p>7 A. Yes.</p> <p>8 Q. In the legal room?</p> <p>9 A. Yes.</p> <p>10 Q. Do you recall whether that meeting with</p> <p>11 Senator Tucker, plus others, occurred on more than one</p> <p>12 occasion?</p> <p>13 A. I believe there were multiple meetings.</p> <p>14 Q. How many legislators were in those meetings?</p> <p>15 A. In addition to Senator Tucker --</p> <p>16 MR. TALLEY: And I'll instruct you not</p> <p>17 to reveal the identifies of any other</p> <p>18 legislator.</p> <p>19 THE WITNESS: Absolutely.</p> <p>20 A. Three to four, in addition.</p> <p>21 Q. And so just to be clear, the development of</p> <p>22 SB727 took on multiple iterations. It was not an</p> <p>23 original map that was then proposed, there were --</p> <p>24 A. I do not recall if there were multiple</p> <p>25 iterations or just a separate bill introduced by</p>

<p style="text-align: right;">Page 207</p> <p>1 Senator Tucker with a different map configuration.</p> <p>2 Q. Or whether one map was developed over multiple</p> <p>3 meetings; is that possible?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. And do you recall producing racial data</p> <p>6 points in relation to SB727?</p> <p>7 A. I do.</p> <p>8 Q. And do you recall whether or not you provided</p> <p>9 those to Senator Tucker or also to the other</p> <p>10 legislators who were part of those meetings?</p> <p>11 A. I believe to Senator Tucker and other members</p> <p>12 that were in attendance, upon Senator Tucker's</p> <p>13 request.</p> <p>14 Q. And any of those data points would be in your</p> <p>15 files?</p> <p>16 A. They would. I cannot recall if some were</p> <p>17 produced live while we were developing the map.</p> <p>18 Q. Okay. I'm marking as Exhibit 19 images --</p> <p>19 graphic representations of what becomes Senate Bill</p> <p>20 728, BLR-CMA-335 to 341.</p> <p>21 A. Thank you.</p> <p>22 (Exhibit 19 marked for identification.)</p> <p>23 Q. Do you recall working on SB -- maps for SB728?</p> <p>24 A. I do.</p> <p>25 Q. Okay. And Senator Elliott introduced SB728?</p>	<p style="text-align: right;">Page 209</p> <p>1 A. Yes.</p> <p>2 Q. Do you recall whether, in developing SB28 [sic],</p> <p>3 that ticker was on the bottom of the screen?</p> <p>4 A. Yes. It was on all the map as it was being</p> <p>5 developed.</p> <p>6 Q. To understand what principles explain SB728, I</p> <p>7 would need to speak to Senator Elliott?</p> <p>8 A. That's correct.</p> <p>9 Q. Okay. Do you recall discussing the maps for</p> <p>10 SB728 with anyone besides Senator Elliott?</p> <p>11 A. I do.</p> <p>12 Q. Were those other people legislators?</p> <p>13 A. Yes.</p> <p>14 Q. Anyone else who was a nonlegislator did you</p> <p>15 discuss SB728 with?</p> <p>16 A. No.</p> <p>17 Q. The other legislators who were a part of these</p> <p>18 discussions, were those in-person discussions?</p> <p>19 A. Yes.</p> <p>20 Q. And they were with Senator Elliott?</p> <p>21 A. Yes.</p> <p>22 Q. And they were within the legal room?</p> <p>23 A. Yes.</p> <p>24 Q. Did you have any calls -- phone calls about</p> <p>25 SB728?</p>
<p style="text-align: right;">Page 208</p> <p>1 A. That's correct.</p> <p>2 Q. And you recall working with Senator Elliott on</p> <p>3 SB728?</p> <p>4 A. That's correct.</p> <p>5 Q. Where did you work with Senator Elliott on these</p> <p>6 maps?</p> <p>7 A. In the Bureau -- excuse me, legal room that</p> <p>8 we've discussed.</p> <p>9 Q. And do you recall whether the information about</p> <p>10 how Senator Elliott wanted SB728 to be was provided --</p> <p>11 what forms was it provided to you?</p> <p>12 A. I believe it was all verbal. I don't believe</p> <p>13 she sent an email, but I may be wrong. There may have</p> <p>14 been an email as well.</p> <p>15 Q. Do you recall whether there were multiple</p> <p>16 meetings on the development of maps for SB728?</p> <p>17 A. I believe so.</p> <p>18 Q. Do you know how, approximately, long it took to</p> <p>19 develop maps for SB728?</p> <p>20 A. I can't recall. This was in the midst of the</p> <p>21 session. I don't recall how long it took to develop</p> <p>22 these or if they were developed immediately and then</p> <p>23 sent out. I just don't recall.</p> <p>24 Q. Did you use the autoBoundEDGE software to</p> <p>25 develop maps for SB728?</p>	<p style="text-align: right;">Page 210</p> <p>1 A. Maybe from Senator Elliott. I do not recall if</p> <p>2 there was any others.</p> <p>3 Q. Okay. Marking as Exhibit 20 is graphic</p> <p>4 representations of maps for HB1966, BLR-CMA-348 to</p> <p>5 354.</p> <p>6 A. Thank you.</p> <p>7 (Exhibit 20 marked for identification.)</p> <p>8 Q. Do you recognize these maps?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Do you -- these maps of HB1966 was</p> <p>11 introduced by Representative Meeks?</p> <p>12 A. Yes.</p> <p>13 Q. And do you recall working on HB1966 maps for</p> <p>14 Representative Meeks?</p> <p>15 A. Yes, I do.</p> <p>16 Q. Do you recall working with any other legislators</p> <p>17 in the development of maps for HB1966?</p> <p>18 A. No, I do not.</p> <p>19 Q. Where was your work done on the development of</p> <p>20 maps for HB1966?</p> <p>21 A. The legal room.</p> <p>22 Q. And how did you receive information from</p> <p>23 Representative Meeks about the development of maps for</p> <p>24 HB1966?</p> <p>25 A. Verbally.</p>

<p>Page 211</p> <p>1 Q. Do you recall receiving any email guidance from 2 Representative Meeks about development of maps for 3 HB1966? 4 A. I don't recall. There may have been an email 5 change later in the process, but I know all the 6 initial map development was verbally and in person. 7 Q. And is it your recollection that it took 8 multiple meetings in order to develop maps for HB1966? 9 A. I can't recall. When I would prepare a map, I 10 would then email them a copy of it. Sometimes they 11 would email back, "I don't like the way this worked. 12 Let's change that," and then email it back. 13 I don't recall if that happened in this 14 particular case. 15 Q. Is it also possible you would email one or more 16 representatives and then they would then come in 17 person in order to follow up? 18 A. That's -- 19 MR. TALLEY: I'll let the witness answer 20 as to the hypothetical, but not with respect 21 to any specific meetings or interactions you 22 had with members of the legislature. 23 Go ahead. 24 A. Yes. In a general sense, absolutely. That's -- 25 that was common practice. If they were out of a</p>	<p>Page 213</p> <p>1 Q. And -- I believe it is Mark. I can represent 2 that it is Mark. 3 And if that is the case, do you recall 4 working with Senator Mark Johnson on SB729 maps? 5 A. Yes. I believe I drafted all the maps 6 Senator Johnson requested. That's why I could not 7 recall. 8 MR. TALLEY: I confirmed. 9 THE WITNESS: Okay. 10 MR. TALLEY: Senate Bill 729 was 11 sponsored by Senator Mark Johnson. 12 THE WITNESS: Thank you. 13 (BY MS. ADEN:) 14 Q. And do you recall where you did work on maps for 15 729? 16 A. It would have been the legal room. 17 Q. And do you recall whether or not you had 18 meetings with Representative John -- Senator Johnson 19 in the legal room? 20 A. I'm assuming. I cannot recall if this was a 21 request by email, phone, or in person. At this point 22 we were in the very middle of the session, and I 23 cannot recall which ones were in person and which ones 24 were by phone or email. 25 Q. And you know at this point because at the bottom</p>
<p>Page 212</p> <p>1 meeting and I had sent an email, they would just stop 2 by and ask for a change if that was their... 3 Q. Do you recall producing any racial data points 4 associated with maps for HB1966? 5 A. I do not believe so. 6 Q. Do you recall speaking with anyone who was not 7 Representative Meeks about HB1966? 8 A. No. 9 Q. Okay. Exhibit 21, these are graphic 10 representations of what becomes SB729, BLR-CMA-360 to 11 366. 12 A. Thank you. 13 (Exhibit 21 marked for identification.) 14 Q. Do you recognize these maps? 15 A. In general, yes. 16 Q. Do you recall -- do you see that Senate Bill 729 17 is proposed by Senator Johnson? 18 A. Yes. 19 Q. And do you recall working with Senator Johnson 20 on maps for SB729? 21 A. I believe so. I do -- my only hesitation is 22 that we have a Senator Blake Johnson and a Senator 23 Mark Johnson, and this only references Senator 24 Johnson. I would need to confirm with SB729 if it was 25 Senator Blake Johnson or Senator Mark Johnson.</p>	<p>Page 214</p> <p>1 of 360, there's a last edit date of 9/24? 2 A. That's correct. 3 Q. Is that what you're referring to? 4 A. Yes. 5 Q. Do you recall working with anyone else besides 6 Senator Johnson on the development of SB729? 7 A. No. 8 Q. Do you recall producing any racial data points 9 for Senator Johnson? 10 A. No. 11 Q. And do you recall talking to anyone who was not 12 Senator Johnson or BLR staff about maps for SB729? 13 A. No. 14 Q. Okay. Marking as Exhibit 22. These are maps 15 for HB1968, BLR-CMA-376 to 382. 16 (Exhibit 22 marked for identification.) 17 A. Yes, ma'am. 18 Q. Do you see that Representative Whitaker proposed 19 HB1968? 20 A. I do. 21 Q. And do you recall working on maps for 1968? 22 A. I believe I do, yes. 23 Q. And do you recall working with anyone else 24 besides Representative Whitaker on maps for SB -- I'm 25 sorry, House Bill 1968?</p>

<p>Page 215</p> <p>1 A. I do not recall. Again, if there was any other 2 person, it would have been Lori Bowen. Because of 3 the -- the timing, she may have started something and 4 I came in to finish it. But I -- I recall working on 5 this but, again, I don't remember. There were times 6 when we were so busy it was get a start on it and then 7 I'll come in and finish up; or it was she would take a 8 request for me while I was on the phone or in another 9 meeting, and then I would draft the bill -- or the 10 draft map. 11 Q. And any of your work on HB1968 would be in your 12 computer or over email? 13 A. That's correct. 14 Q. And any information that you would have received 15 about which counties or precincts Senator -- 16 Representative Whitaker wanted in the design of this 17 map, Representative Whitaker would have that 18 information? 19 A. That's correct. 20 Q. Okay. Let's go to -- and just I'll ask, because 21 I can't remember if I did: Did you speak with anyone 22 else besides Representative Whitaker or potentially 23 Ms. Bowen in the development of maps for HB1968? 24 A. Not that I recall. 25 Q. Marking as Exhibit 23 are images for HB1969,</p>	<p>Page 217</p> <p>1 A. That's correct. 2 Q. Is that the type of image that jogs your memory 3 that you may have worked on a map? 4 A. That's correct. 5 Q. I should have asked you earlier: Why would you 6 provide these more detailed images of specific 7 sections of maps? 8 MR. TALLEY: To the extent that can be 9 answered without revealing a request or a 10 communication with a member of the General 11 Assembly, the witness may answer. 12 Otherwise, it's subject to privilege. 13 A. We offered the ability for the members to 14 present the maps in however they chose, to committee, 15 universally. 16 Q. So detailed images is not something that the 17 Bureau would do as a matter of form? It would -- this 18 is an occasion where you would have to be requested to 19 provide this type of image for a map? 20 A. We actually would ask at the initial meeting, 21 "Do you want the same ones that had been previously 22 introduced, or would you like something else?" 23 So they had the option at any point to 24 request any type of map. 25 Q. And looking at the image 415, can you tell me</p>
<p>Page 216</p> <p>1 BLR-CMA-418 to 424. 2 (Exhibit 23 marked for identification.) 3 Q. Okay. Do you recall working on maps for HB1969? 4 A. I cannot recall if I did these or if Lori did. 5 Q. And you don't have a recollection of working 6 with Representative Gonzales specifically? 7 A. Not specifically. Again, I've worked with so 8 many members on different -- I can't recall 9 specifically drafting the bill for him -- or drafting 10 the map for him. However, I very likely could have. 11 Q. Okay. And do you have any recollection of 12 providing any specific racial demographic points for 13 Representative Gonzales in the development of HB1969? 14 A. No, I did not run any of those reports. 15 Q. I would like to do one more and then take a 16 break. 17 A. Okay. 18 Q. Let's go to Exhibit 24, which are graphic 19 representations of HB1970, BLR-CMA-408 to 416. 20 (Exhibit 24 marked for identification.) 21 (BY MS. ADEN:) 22 Q. Do you recall working on maps for HB1970? 23 A. I believe I did. 24 Q. Okay. And I notice on 415, for example, there 25 is a more microimage of Districts 3 and 4.</p>	<p>Page 218</p> <p>1 what an image like this generally is trying to show? 2 A. The light orange lines are precinct lines. 3 Other than that, I can say that it's precinct lines 4 with county lines and county designations. 5 Q. And so is it fair to say that an image like this 6 would show you at the precinct level where a precinct 7 might fall within or without a district? 8 A. That's correct. 9 Q. Were there images that you provided with 10 precincts identified by their -- the number that's 11 associated with them? 12 A. I don't recall doing so. 13 Q. And so in looking at this precinct level image 14 on 415 for the Sebastian area, would someone be able 15 to -- strike that. 16 In providing this precinct level 17 analysis for particular maps, with respect to any map 18 where you did that, would you ever provide census 19 demographic data associated with precincts? 20 A. Not that I recall. 21 Q. Do you recall ever being asked for census 22 demographic data specific to any particular precincts 23 in developing congressional maps? 24 MR. TALLEY: As phrased, I will allow 25 the witness to answer that question and</p>

Page 219	Page 221
<p>1 instruct her just simply not to reveal any</p> <p>2 legislative communication she had.</p> <p>3 A. Not to my knowledge.</p> <p>4 Q. And so, just so I can understand a little bit</p> <p>5 better, if you go to 414, for example, you can see in</p> <p>6 that image on the Sebastian County line what appears</p> <p>7 to be Sebastian County split between two districts; is</p> <p>8 that fair?</p> <p>9 A. That's a fair representation.</p> <p>10 Q. And so you can see at that level the split of a</p> <p>11 county. But then when you go to 415, you're at a</p> <p>12 level down where you're looking at particular</p> <p>13 precincts that are split within that county.</p> <p>14 Is that what the difference is between</p> <p>15 those two images?</p> <p>16 A. It's not the precincts being split. It's the</p> <p>17 county and reflecting which precinct is in which</p> <p>18 congressional district.</p> <p>19 Q. Gotcha.</p> <p>20 Okay. So that is the distinction</p> <p>21 between the image of 414 as compared to 415?</p> <p>22 A. That's correct. It's a granular image of the</p> <p>23 same map.</p> <p>24 Q. Gotcha.</p> <p>25 And at the request for a more granular</p>	<p>1 A. Yes.</p> <p>2 Q. What do you recognize them to be?</p> <p>3 A. I recognize them to be graphic illustrations of</p> <p>4 a map drawn for Representative Speaks.</p> <p>5 Q. And Representative Speaks introduced HB1971?</p> <p>6 A. That's correct.</p> <p>7 Q. And I mentioned that there's a jump in the Bates</p> <p>8 stamp numbers. 400 to 407 looks like maybe the</p> <p>9 original map that was introduced as part of 1971. And</p> <p>10 then if you look at 459, it looks like perhaps there</p> <p>11 was an amendment to HB1979.</p> <p>12 Does that sound familiar to you?</p> <p>13 A. Yes. I believe at some point -- I will be</p> <p>14 honest, there were several bills that bled together</p> <p>15 and which ones got amended.</p> <p>16 Again, this was at the very busiest</p> <p>17 point of the session. So my recollection of what</p> <p>18 happened with each individual bill is very shady</p> <p>19 because I -- I know we were just working on maps</p> <p>20 constantly, and I don't remember which map met with</p> <p>21 which number. And so if I saw the bill itself, I</p> <p>22 could tell you if it was amended and when the</p> <p>23 amendment happened and things of that nature.</p> <p>24 From the maps alone, I have a -- I can</p> <p>25 tell they're different, but I don't remember exactly</p>
Page 220	Page 222
<p>1 image at that level would come from specific</p> <p>2 legislators, generally?</p> <p>3 MR. TALLEY: Generally, I'm okay with</p> <p>4 having the witness answer that question,</p> <p>5 with the understanding I am certainly not</p> <p>6 intending to waive anything.</p> <p>7 Go ahead.</p> <p>8 A. Yes.</p> <p>9 Q. And just to wrap this up, do you recall speaking</p> <p>10 with anyone who is not Representative Dotson or</p> <p>11 another legislator or BLR staff in the development of</p> <p>12 HB1970?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 MS. ADEN: Can we take ten, please?</p> <p>16 THE WITNESS: Yeah. That will be great.</p> <p>17 (Recess from 2:37 p.m. to 2:52 p.m.)</p> <p>18 (BY MS. ADEN:)</p> <p>19 Q. Okay. Let us mark as Exhibit 25, please,</p> <p>20 graphic representations of House Bill 1971. This is</p> <p>21 Bates-stamped BLR-CMA-400, and I want to be clear, to</p> <p>22 407. And then there is a jump in the Bates stamp</p> <p>23 number from 449 to 465, and we can talk about why.</p> <p>24 (Exhibit 25 marked for identification.)</p> <p>25 Q. Do you recognize these images?</p>	<p>1 when the timing of those differences occurred.</p> <p>2 Q. Awesome.</p> <p>3 And if you look at 459, at the top left</p> <p>4 it says, "HB1971-MLD406."</p> <p>5 A. That's correct.</p> <p>6 Q. Do -- the MLD, does that refer to you?</p> <p>7 A. It does.</p> <p>8 Q. Okay. So does that mean that you worked on</p> <p>9 those set of images?</p> <p>10 A. That means I drafted the bill or the amendment</p> <p>11 that the images were related to.</p> <p>12 Q. Okay.</p> <p>13 A. And so actually, every one of these would have a</p> <p>14 different MLD number attached to the bill at the</p> <p>15 bottom. And so it looks like maybe -- I don't know</p> <p>16 why there's a separate one. Maybe that was my way of</p> <p>17 designating that it was different than the other one</p> <p>18 that had been created.</p> <p>19 Again, I don't remember why there were</p> <p>20 two, but at some point, there was a change made and so</p> <p>21 I had that designation so that we would know which one</p> <p>22 was which.</p> <p>23 Q. Do you remember working with Representative</p> <p>24 Speaks on maps for HB1971?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 223</p> <p>1 Q. Okay. Do you recall working with any other 2 legislator in the development of HB1971? 3 A. Again, I can't recall if it was the number -- 4 the numbers of the bills and where I worked with 5 Representative Speaks and another member. I can't tie 6 it to a number specifically because at this point I 7 know I worked with Representative Speaks, I know I 8 worked with other members that Representative Speaks 9 told me I could work with, but I can't remember which 10 bill which designation went with by the numbers alone. 11 Q. And your work would have been performed in the 12 legal room at the computer? 13 A. That's correct. There may have been one point 14 when Ms. Bowen drafted part of a map. If I was 15 occupied with another member, then that person would 16 pick up the next person. Again, this was when things 17 were incredibly busy. 18 Q. Do you recall whether Representative Speaks 19 shared written information with you outside of the 20 information available to you on autoBoundEDGE in the 21 developing -- development of congressional maps? 22 MR. TALLEY: I'll instruct the witness 23 to answer that question with "yes," "no," or 24 "I don't know," and nothing further. 25 A. I don't know.</p>	<p style="text-align: right;">Page 225</p> <p>1 informations based on the bill introduced by 2 Representative Speaks. 3 Q. For HB1971? 4 MR. TALLEY: Object to form. 5 A. I do not recall the number. Again, I just do 6 not remember which numbers finally were the bills that 7 were enacted. 8 Q. And by way of your answer, is it fair to say 9 that it wasn't Representative Speaks who directed you 10 to prepare that demographic information? 11 A. Yes. 12 Q. It was another legislator who asked you for 13 racial demographic information for a bill being 14 proposed by Representative Speaks? 15 A. Yes. 16 Q. But you're not sure whether that was HB1971 or 17 another bill being prepared by -- being proposed by 18 Representative Speaks? 19 A. I can't remember if it was the same number or 20 not, correct. 21 Q. Okay. Did the information that you prepared for 22 that legislator with racial demographics, did you 23 share that with Representative Speaks? 24 A. No. If there's a request from a legislator, 25 it's an independent request from a legislator. So</p>
<p style="text-align: right;">Page 224</p> <p>1 Q. Do you recall whether your communications with 2 Representative Speaks happened in person? 3 A. I know there were in-person communications. 4 There may have been telephone communications, and 5 there may or may not have been written communications. 6 Q. Do you recall working with Representative Speaks 7 in -- in a room where you would have talked to someone 8 who was a nonlegislator or non-BLR staff member? 9 A. No. 10 Q. Do you recall discussing maps that you were 11 working on with Representative Speaks with anyone who 12 was a nonlegislator or non-BLR staff member? 13 A. No. 14 Q. Do you recall developing information with racial 15 demographics for maps for Representative Speaks? 16 MR. TALLEY: Can you ask that again? 17 THE WITNESS: Yes. 18 (BY MS. ADEN:) 19 Q. Do you recall preparing racial demographic 20 information for maps for Representative Speaks? 21 A. For Representative Speaks? No. 22 Q. Do you recall developing racial demographic 23 information for maps done in preparation for HB1971? 24 MR. TALLEY: Object to form. 25 A. I remember preparing racial demographic</p>	<p style="text-align: right;">Page 226</p> <p>1 that privacy would maintain after the bill has been 2 filed. If I have a question about it, it would be 3 just to the person who requested the information. 4 Q. And are you aware of whether the racial 5 demographic information that you prepared was 6 discussed as part of the public legislative record? 7 A. I do not recall. 8 Q. Okay. Who would I talk to, besides you, to 9 understand what decisions went into developing HB1971 10 in its original or any amended forms? 11 A. Representative Speaks. 12 Q. Anyone else? 13 A. To my knowledge, that's who I received the 14 request from, so that's who would have the 15 information. 16 MR. TALLEY: And I'll instruct the 17 witness not to reveal the identities of any 18 other legislators. 19 (BY MS. ADEN:) 20 Q. Okay. Let's go to Exhibit 26, which is -- which 21 are images of Senate Bill 741, BLR-CMA-439 to 445. 22 A. Thank you. 23 (Exhibit 26 marked for identification.) 24 Q. Before I ask you something specific about this 25 map, I just want to go back to another question, which</p>

<div>Page 227</div> <div><div>1</div><div>is: Were you aware that during a September 21st House</div><div>2</div><div>Committee hearing that members informally ranked</div><div>3</div><div>proposed congressional maps?</div><div>4</div><div>A. Yes.</div><div>5</div><div>Q. Were you present at that hearing?</div><div>6</div><div>A. I don't believe I was -- I don't believe I was</div><div>7</div><div>present during that particular meeting. I just can't</div><div>8</div><div>recall.</div><div>9</div><div>Q. But if you were not present, you would have</div><div>10</div><div>watched it virtually?</div><div>11</div><div>A. That's correct.</div><div>12</div><div>Q. Okay. And were you aware that</div><div>13</div><div>Representative Speaks' 1971, which we just discussed,</div><div>14</div><div>was ranked the highest amongst the bills being ranked</div><div>15</div><div>at that time?</div><div>16</div><div>MR. TALLEY: I'll instruct the witness</div><div>17</div><div>not to answer, to the extent it calls for</div><div>18</div><div>some information she learned from a</div><div>19</div><div>legislator or reveals a legislative</div><div>20</div><div>communication. To the extent she has</div><div>21</div><div>personal knowledge as to that, I'll let her</div><div>22</div><div>answer.</div><div>23</div><div>A. I believe I remember that. I don't remember</div><div>24</div><div>exactly which ones. I believe I knew it was ranked.</div><div>25</div><div>I can't remember if I knew if it was ranked first,</div></div>	<div>Page 229</div> <div><div>1</div><div>listening. And if a member asked a lot of questions</div><div>2</div><div>or made a statement that questioned if we moved this</div><div>3</div><div>county here, what would it look like, my bet is that</div><div>4</div><div>member is going to potentially ask for a map. So that</div><div>5</div><div>kind of helps me understand what my day's going to</div><div>6</div><div>look like for the rest of the day.</div><div>7</div><div>Q. All right. So Exhibit 26, I think we're looking</div><div>8</div><div>at.</div><div>9</div><div>Do you see that these are images of</div><div>10</div><div>SB741, a bill that was proposed by Senator Gilmore?</div><div>11</div><div>A. I do.</div><div>12</div><div>Q. Do you recall working on maps for Senate Bill</div><div>13</div><div>741?</div><div>14</div><div>A. I cannot recall if I worked on this or if</div><div>15</div><div>Ms. Bowen worked on this initially. At this point,</div><div>16</div><div>everything looks very familiar to me because I was</div><div>17</div><div>drafting bills for each one of them and so I can't</div><div>18</div><div>recall if I saw the map during direct interactions</div><div>19</div><div>with the member or if it was through the drafting</div><div>20</div><div>process of actually putting it together in a bill at</div><div>21</div><div>this point.</div><div>22</div><div>Q. And your computer system and/or emails would</div><div>23</div><div>give you more information about what you might have</div><div>24</div><div>been doing with respect to particular proposed bills?</div><div>25</div><div>A. That's correct.</div></div>
<div>Page 228</div> <div><div>1</div><div>second. Somewhere in there.</div><div>2</div><div>Q. Did its ranking impact any of the work that you</div><div>3</div><div>were doing?</div><div>4</div><div>A. No, not at all. I was continuing to draft bills</div><div>5</div><div>for members.</div><div>6</div><div>Q. Okay. And just so I'm clear for the record,</div><div>7</div><div>when you were virtually listening to, observing</div><div>8</div><div>hearings, is it your position that you never took the</div><div>9</div><div>information from those hearings and implemented</div><div>10</div><div>anything out -- that you learned from those hearings,</div><div>11</div><div>except if it was at the express direction of a</div><div>12</div><div>particular legislator?</div><div>13</div><div>A. That's correct.</div><div>14</div><div>Q. And so it's fair to say that if you had</div><div>15</div><div>concerns, for example, about -- if you heard concerns,</div><div>16</div><div>for example, about how a map did this X, Y, Z, that it</div><div>17</div><div>was not your job to address what you heard except if a</div><div>18</div><div>legislator directed you to respond to something that</div><div>19</div><div>had been discussed on the legislative floor?</div><div>20</div><div>A. That's correct, and respond in the form of a</div><div>21</div><div>request of their own for a map or a map change. So...</div><div>22</div><div>Q. So why would you watch the hearings?</div><div>23</div><div>A. It gave me a good idea of if I was going to</div><div>24</div><div>expect additional map requests, to plan time. Often I</div><div>25</div><div>would be drafting at the same time I would be</div></div>	<div>Page 230</div> <div><div>1</div><div>Q. But do you recall specifically discussing SB741</div><div>2</div><div>with anyone who wasn't a legislator or BLR staff?</div><div>3</div><div>A. No.</div><div>4</div><div>Q. Let's mark as Exhibit 27 images of House Bill</div><div>5</div><div>1976, BLR-CMA-452 to 458.</div><div>6</div><div>A. Thank you so much.</div><div>7</div><div>(Exhibit 27 marked for identification.)</div><div>8</div><div>Q. Do you recognize these images?</div><div>9</div><div>A. I recognize them as another bill for</div><div>10</div><div>Representative Speaks. Again, I know I drafted</div><div>11</div><div>several maps for Representative Speaks. The numbers</div><div>12</div><div>are what -- I'm not familiar with which one is which.</div><div>13</div><div>Q. Okay. And outside of Representative Speaks or</div><div>14</div><div>another legislator, do you have any specific</div><div>15</div><div>recollection of talking to -- sorry. Strike that.</div><div>16</div><div>Outside of Representative Speaks,</div><div>17</div><div>another legislator or other BLR staff, do you recall</div><div>18</div><div>having any discussions about maps for HB1976?</div><div>19</div><div>A. No.</div><div>20</div><div>Q. Do you recall in the earlier map where you --</div><div>21</div><div>sorry.</div><div>22</div><div>The earlier testimony where you</div><div>23</div><div>indicated that you prepared racial demographic</div><div>24</div><div>information in relation to a bill by Representative</div><div>25</div><div>Speaks, are you aware of whether that was for HB1976</div></div>

<p>1 or not?</p> <p>2 A. I do not recall the number of which I prepared</p> <p>3 that information. It was the bill that was finally</p> <p>4 adopted, but I don't remember which one that was.</p> <p>5 Q. And just so I'm clear, the -- there are multiple</p> <p>6 bills being introduced by Representative Speaks. Do</p> <p>7 you recall one occasion in which you pulled racial</p> <p>8 demographic data at the request of another legislator</p> <p>9 for a bill about Representative Speaks, or was that on</p> <p>10 multiple occasions?</p> <p>11 A. One occasion -- let me back up.</p> <p>12 I believe it was one occasion. I can't</p> <p>13 recall if multiple people requested that information.</p> <p>14 Q. The same information?</p> <p>15 A. The same information.</p> <p>16 Q. When you shared that information, did you share</p> <p>17 it with legislators individually, or was it a group</p> <p>18 that you were responding to for that request?</p> <p>19 A. Individually.</p> <p>20 Q. Individually.</p> <p>21 A. Every request is treated as its own individual</p> <p>22 request. I remember having a report on the</p> <p>23 demographic data. I can't remember if there were</p> <p>24 multiple requests for that information from different</p> <p>25 members.</p>	<p>Page 231</p>	<p>1 and look. I just remember it being related to that</p> <p>2 issue.</p> <p>3 Q. And by minority representation, do you mean the</p> <p>4 populations of minority people per district?</p> <p>5 A. Yes.</p> <p>6 Q. Do you recall whether it had the population of</p> <p>7 minority people per precinct?</p> <p>8 A. I do not recall.</p> <p>9 Q. And do you recall whether it identified the</p> <p>10 black population per district?</p> <p>11 A. I don't recall if it was broken down that</p> <p>12 gran- -- I just don't recall what that looked like.</p> <p>13 Q. Okay. But that report would be on your -- in</p> <p>14 your email records and/or on your legal computer?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. I would like to mark as Exhibit 28 images</p> <p>17 of House Bill 1978, BLR-CMA-475 to 481.</p> <p>18 (Exhibit 28 marked for identification.)</p> <p>19 Q. Do you recognize these images?</p> <p>20 A. In the vaguest sense from drafting, but I do not</p> <p>21 recall if I drafted this map for Representative Love</p> <p>22 or not.</p> <p>23 Q. And is that because you recall generally working</p> <p>24 with Representative Love on congressional maps but not</p> <p>25 necessarily which specific bill -- maps for any</p>	<p>Page 233</p>
<p>1 Q. And you gave that same report to different</p> <p>2 legislators separately?</p> <p>3 A. I believe so. I cannot -- it would not have</p> <p>4 been in a group email, unless that's how the request</p> <p>5 came in. But it would be by email.</p> <p>6 Q. And so you are sure or unsure whether or not it</p> <p>7 was a group email or not?</p> <p>8 A. I'm unsure. I cannot recall.</p> <p>9 Q. And you -- but you are sure that it wasn't the</p> <p>10 same information that you're giving in relation to</p> <p>11 Representative Speaks' legislation?</p> <p>12 A. I'm going to clarify because I recall pulling</p> <p>13 racial demographic information about one of</p> <p>14 Representative Speaks' bills that was the final</p> <p>15 version that was adopted. I don't recall how many</p> <p>16 times I was requested for that information or by who</p> <p>17 or how many.</p> <p>18 Q. Where did you get the racial demographic data?</p> <p>19 A. From autoBound.</p> <p>20 Q. And do you recall, generically, what that racial</p> <p>21 data encompassed?</p> <p>22 A. It was one of the reports, and I do not remember</p> <p>23 which one it was, but it provided the, I believe,</p> <p>24 breakdown of the minority representation in each</p> <p>25 district, I believe. I really would have to go back</p>	<p>Page 232</p>	<p>1 particular bill?</p> <p>2 A. That's correct.</p> <p>3 Q. Do you recall where you worked with</p> <p>4 Representative Love on congressional mapmaking?</p> <p>5 A. I cannot recall, and I -- again, this was at the</p> <p>6 busiest point. I cannot recall if it was myself or</p> <p>7 Ms. Bowen who worked with Representative Love on the</p> <p>8 initial part of the map.</p> <p>9 I, of course, would have worked with the</p> <p>10 member by the time I was getting it into the drafting</p> <p>11 stage and corresponding with them at that point. So I</p> <p>12 just cannot recall who had the initial map drawing of</p> <p>13 this particular bill.</p> <p>14 Q. Do you recall communicating with anyone else</p> <p>15 besides Representative Love or Ms. Bowen about maps</p> <p>16 that you were preparing for Representative Love?</p> <p>17 A. No.</p> <p>18 Q. And do you recall working with other legislators</p> <p>19 at the direction of Representative Love in preparation</p> <p>20 for any maps?</p> <p>21 A. I do not recall that.</p> <p>22 Q. Do you recall preparing any racial demographic</p> <p>23 information specifically for Representative Love?</p> <p>24 A. No, I do not.</p> <p>25 Q. Okay. Let's mark as Exhibit 29 images of SB742,</p>	<p>Page 234</p>

Page 235	Page 237
<p>1 BLR-CMA-488 to 494.</p> <p>2 A. Thank you.</p> <p>3 (Exhibit 29 marked for identification.)</p> <p>4 Q. Do you recognize these images?</p> <p>5 A. In general, yes.</p> <p>6 Q. And generally is that because SB742 was proposed</p> <p>7 by Senator English, and you worked with Senator</p> <p>8 English on congressional mapmaking? Or why?</p> <p>9 A. I -- I believe that Ms. Bowen may have started</p> <p>10 this particular map. I cannot recall specifically. I</p> <p>11 know I definitely drafted that portion of it.</p> <p>12 Towards the end of this, Lori was doing</p> <p>13 more of the map drawing because I was so heavily in</p> <p>14 the drafting process, which was very intensive when</p> <p>15 you're checking and cross-checking counties and</p> <p>16 precincts to ensure you have everything listed.</p> <p>17 So I cannot remember if she started the</p> <p>18 map and then I worked on printing out different</p> <p>19 portions of it or -- I just cannot recall.</p> <p>20 Q. And I'm looking at the last edited date on</p> <p>21 BLR-488, and it says last edited 10/4/2021. So that's</p> <p>22 the time period -- the latter side of the time period</p> <p>23 that you're referring to?</p> <p>24 A. That's correct.</p> <p>25 Q. And things are very hectic?</p>	<p>1 Representative Speaks on congressional maps. And as</p> <p>2 you sit here today, you do not know which particular</p> <p>3 map number you were working on her with; is that fair?</p> <p>4 A. That's fair.</p> <p>5 MR. TALLEY: By map number, you mean</p> <p>6 bill number.</p> <p>7 (BY MS. ADEN:)</p> <p>8 Q. And that at least with respect, there was at</p> <p>9 least one occasion where you prepared racial</p> <p>10 demographic data for a legislator in relation to a map</p> <p>11 that Representative Speaks was working on?</p> <p>12 A. That's correct.</p> <p>13 Q. And then as I'm understanding you right now, and</p> <p>14 as you separately recall that you prepared racial</p> <p>15 demographic data for Senator English in the bill that</p> <p>16 was the latter bill that ultimately became the enacted</p> <p>17 congressional map; is that accurate?</p> <p>18 A. No.</p> <p>19 Q. Okay.</p> <p>20 A. It was not a request by Senator English.</p> <p>21 Q. So like the earlier request with respect to</p> <p>22 Senator Speaks [sic], it was another legislator or</p> <p>23 legislators who wanted racial demographic data about</p> <p>24 what Senator English was proposing?</p> <p>25 A. Yes.</p>
Page 236	Page 238
<p>1 A. Very, very hectic.</p> <p>2 Q. Okay. And do you recall preparing any specific</p> <p>3 racial data information with respect to SB742?</p> <p>4 A. I cannot recall if there was a request for that</p> <p>5 information for this map or if it was the map that</p> <p>6 both Representative Speaks and English introduced at</p> <p>7 the same time under different -- concurrent bills.</p> <p>8 So I cannot remember if the request came</p> <p>9 in for the data for SB -- I know it was over the final</p> <p>10 map that was adopted, but I can't recall the numbers</p> <p>11 that were associated with it.</p> <p>12 Q. Okay. So this is not the final map.</p> <p>13 A. Okay.</p> <p>14 Q. So does that help you --</p> <p>15 A. Yes, then I would not --</p> <p>16 Q. (Indiscernible.)</p> <p>17 THE STENOGRAPHER: I'm sorry. I</p> <p>18 didn't -- did not catch the last part of</p> <p>19 your question.</p> <p>20 (BY MS. ADEN:)</p> <p>21 Q. Does that help you understand that it was not</p> <p>22 for this map?</p> <p>23 A. It does.</p> <p>24 Q. And so in your testimony just from a few minutes</p> <p>25 ago, I understood that you were working with</p>	<p>1 Q. Which you understood to be the map that was</p> <p>2 ultimately enacted?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. And with respect to the -- was it one or</p> <p>5 multiple legislators who were requesting racial</p> <p>6 demographic data for the map that Senator English was</p> <p>7 proposing that became enacted?</p> <p>8 A. I cannot recall.</p> <p>9 Q. Do you recall whether or not you provided that</p> <p>10 data over email?</p> <p>11 A. It would have been provided that way, yes.</p> <p>12 Q. Do you recall whether the data that you gave was</p> <p>13 the same data that you describe having prepared for</p> <p>14 the legislators in reference to Senator Speaks --</p> <p>15 Representative Speaks' map?</p> <p>16 A. Yes.</p> <p>17 Q. So it was the same type -- exact same or</p> <p>18 similar?</p> <p>19 A. It was the same map; therefore, it was the same</p> <p>20 data.</p> <p>21 Q. Gotcha.</p> <p>22 So the earlier -- I'm sorry.</p> <p>23 So you just clarified your recollection,</p> <p>24 which I believe to be the case is that Senator Speaks</p> <p>25 [sic] and Senator English ultimately prepared parallel</p>

<p>1 maps that were then -- became law?</p> <p>2 A. That's correct.</p> <p>3 Q. And when you were earlier referencing data that</p> <p>4 you were providing in relation to a bill that Senator</p> <p>5 Speaks was -- representative.</p> <p>6 A. Representative, you're correct.</p> <p>7 Q. Representative Speaks was proposing, it was in</p> <p>8 relation to that parallel legislation of</p> <p>9 Senator English?</p> <p>10 A. That's correct.</p> <p>11 Q. Gotcha.</p> <p>12 And then ultimately you're preparing the</p> <p>13 same demographic data for the different proposals?</p> <p>14 A. That's correct. I do not recall if it was under</p> <p>15 the guise of the Senator English bill or the</p> <p>16 Representative Speaks bill, they were the same map at</p> <p>17 that point and so the data is exactly the same.</p> <p>18 I don't recall -- that's why I don't</p> <p>19 recall the numbers that were used by either of them in</p> <p>20 that process. And like you mentioned, there's</p> <p>21 multiple numbers. So I don't recall which one was</p> <p>22 which and which one was the final by number.</p> <p>23 Q. And it wasn't the sponsors requesting the racial</p> <p>24 demographic data?</p> <p>25 A. That's correct.</p>	<p>Page 239</p> <p>1 districts that we used.</p> <p>2 Q. Gotcha.</p> <p>3 And if I represent that House Bill 1979</p> <p>4 was proposed by Representative Dotson, do you recall</p> <p>5 working with Representative Dotson on House Bill 1979?</p> <p>6 A. I don't recall the number, but I believe I</p> <p>7 drafted all the map requests for Representative</p> <p>8 Dotson.</p> <p>9 Q. Okay. Going to the third page in, there is the</p> <p>10 beginning of different snapshots for each of the four</p> <p>11 districts. In the bottom right-hand corner it says,</p> <p>12 "edge 2020 professional redistricting."</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Do you have familiarity with the type of</p> <p>16 information that is being shown on these four pages?</p> <p>17 A. In a general sense, yes, from looking through</p> <p>18 autoBound and the availability of different reports or</p> <p>19 snapshots, as you mentioned.</p> <p>20 Q. And just to be clear, did you ever produce</p> <p>21 reports that look like this?</p> <p>22 A. No.</p> <p>23 Q. So the racial demographic information that you</p> <p>24 provided in relation to Speaks' and English's bills</p> <p>25 did not appear like this?</p>
<p>Page 240</p> <p>1 Q. And the -- because the data that you're</p> <p>2 providing is the same data, this is data that you</p> <p>3 prepared using autoBoundEDGE?</p> <p>4 A. That's correct.</p> <p>5 Q. And in working on maps for Senator English, you</p> <p>6 would have been using at least the data that was</p> <p>7 available to you on autoBoundEDGE?</p> <p>8 A. That's correct.</p> <p>9 Q. Okay. Let us go to Exhibit 30.</p> <p>10 A. Thank you.</p> <p>11 MR. TALLEY: I object to not receiving a</p> <p>12 color copy.</p> <p>13 (Exhibit 30 marked for identification.)</p> <p>14 (BY MS. ADEN:)</p> <p>15 Q. So these are Bates-stamped P100449 to 454, and I</p> <p>16 think we established yesterday that in the top</p> <p>17 right-hand corner of these images, there's a stamp for</p> <p>18 the Geographic Information Systems.</p> <p>19 So this is not a BLR production, and</p> <p>20 they -- the marker on the top left corner indicates</p> <p>21 that this is congressional draft HB1979.</p> <p>22 Are you familiar with these images?</p> <p>23 A. I have never seen these particular ones. I can</p> <p>24 tell they weren't produced by us because they didn't</p> <p>25 use the same color scheme on the congressional mapping</p>	<p>Page 242</p> <p>1 A. No, it did not.</p> <p>2 Q. But was produced by autoBoundEDGE like this,</p> <p>3 these snapshots are purporting to be derived from?</p> <p>4 A. That's correct.</p> <p>5 Q. Do you know -- we talked about this before that</p> <p>6 in the top right-hand corner, for example 451, there</p> <p>7 are racial demographic -- it looks like total</p> <p>8 population numbers.</p> <p>9 So what -- how many Hawaiian/Island --</p> <p>10 Hawaii-specific islander, as compared to Native</p> <p>11 American, as compared to Asian, as compared to African</p> <p>12 American, as compared to white persons are in</p> <p>13 District 1?</p> <p>14 A. I see that represented here, yes.</p> <p>15 Q. Is that amount of a racial group -- total</p> <p>16 population, is that the type of racial demographic</p> <p>17 data that you provided?</p> <p>18 MR. TALLEY: I'll object and instruct</p> <p>19 the witness not to answer on the grounds of</p> <p>20 legislative privilege.</p> <p>21 (BY MS. ADEN:)</p> <p>22 Q. Okay. Let us mark as Exhibit 31 --</p> <p>23 A. This is 31 -- excuse me. This didn't have a</p> <p>24 sticker on it for 30.</p> <p>25 I understand. I just noticed that as</p>

<p>1 well.</p> <p>2 MX. BENJAMIN: My bad. So concerned</p> <p>3 about the --</p> <p>4 (BY MS. ADEN:)</p> <p>5 Q. So HB1979 is Exhibit 30?</p> <p>6 A. That's correct.</p> <p>7 Q. And Exhibit 31 is -- are images of HB1980,</p> <p>8 BLR-CMA-518 to 524.</p> <p>9 (Exhibit 31 marked for identification.)</p> <p>10 Q. Does it reflect that HB1980 was proposed by</p> <p>11 Representative Flowers?</p> <p>12 A. It does.</p> <p>13 Q. Do you recall working on HB1980 specifically?</p> <p>14 A. Not specifically.</p> <p>15 Q. Okay.</p> <p>16 A. I know I worked with her, but I don't remember</p> <p>17 if I worked with her on this draft version.</p> <p>18 Q. Understood.</p> <p>19 Do you have -- do you know whether or</p> <p>20 not you presented -- prepared demographic data --</p> <p>21 racial demographic data for Representative Flowers in</p> <p>22 relation to HB1980?</p> <p>23 A. I don't recall.</p> <p>24 Q. All right. Let us mark as Exhibit 32 images of</p> <p>25 what is introduced as House Bill 1981.</p>	<p>Page 243</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Let's go to Exhibit 33. These are images</p> <p>3 of what is House Bill 1983, BLR-CMA-542 to 548.</p> <p>4 A. Thank you.</p> <p>5 (Exhibit 33 marked for identification.)</p> <p>6 Q. Do you recognize these images?</p> <p>7 A. I do. I remember working on this with</p> <p>8 Representative Payton.</p> <p>9 Q. Do you recall whether any other legislators</p> <p>10 worked with Representative Payton on HB1983?</p> <p>11 A. I cannot recall.</p> <p>12 Q. Do you recall whether any other BLR staff worked</p> <p>13 on HB1983?</p> <p>14 A. I don't believe so. I believe I was the only</p> <p>15 one who worked on that one.</p> <p>16 Q. And is there any reason why you think you're the</p> <p>17 only person who worked on it?</p> <p>18 A. I just have a recollection of receiving that</p> <p>19 request, but I don't recall if -- I don't believe</p> <p>20 Ms. Bowen assisted on that one.</p> <p>21 Q. Do you recall -- where do you recall working</p> <p>22 with Representative Payton on maps for HB1983?</p> <p>23 A. I cannot remember if he called me or if he came</p> <p>24 by the office.</p> <p>25 Q. Do you recall having more than one meeting on</p>
<p>Page 244</p> <p>1 A. Thank you.</p> <p>2 Q. This is BLR-CMA-525 to 532.</p> <p>3 (Exhibit 32 marked for identification.)</p> <p>4 Q. And HB1981 is proposed by Representative Dotson;</p> <p>5 is that fair?</p> <p>6 A. That's fair.</p> <p>7 Q. Okay. And do you recognize having worked on</p> <p>8 maps for HB1981 specifically?</p> <p>9 A. Not specifically. But, again, I believe I</p> <p>10 drafted all the ones for Representative Dotson.</p> <p>11 Q. Gotcha.</p> <p>12 Okay. On the last page of this, 532, it</p> <p>13 looks like there's another precinct level view of</p> <p>14 District 4; is that fair to say?</p> <p>15 A. District 2 --</p> <p>16 Q. District 2.</p> <p>17 A. -- and District -- I'm lost at this district</p> <p>18 map -- district number. And District 1. 1 is the</p> <p>19 purple.</p> <p>20 Q. Okay. A piece of those districts, though?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. And based upon your earlier testimony, is</p> <p>23 it the case that you would have provided this precinct</p> <p>24 level view of these districts at the request of</p> <p>25 Representative Dotson?</p>	<p>Page 246</p> <p>1 maps for HB1983?</p> <p>2 A. I can't recall if he may have emailed first and</p> <p>3 then stopped by. I know there were several</p> <p>4 communications, but I don't recall specifics as to --</p> <p>5 it was in the middle of committee meetings and a very</p> <p>6 hectic time at that point. So I don't recall all the</p> <p>7 communications.</p> <p>8 Q. And do you recall providing any additional</p> <p>9 demographic information for this bill outside of the</p> <p>10 population figures that are reported on these images?</p> <p>11 A. I don't recall any other information.</p> <p>12 Q. Okay. Do you recall speaking with anyone</p> <p>13 besides Representative Payton and/or any BLR staff</p> <p>14 about maps for HB1983?</p> <p>15 A. I cannot recall if another legislator was</p> <p>16 authorized on this bill or not.</p> <p>17 Q. Okay.</p> <p>18 A. I just can't recall.</p> <p>19 Q. And by "authorized on this bill," that means to</p> <p>20 work with you to effectuate --</p> <p>21 A. That's correct.</p> <p>22 Q. -- changes to --</p> <p>23 MR. TALLEY: Let her finish.</p> <p>24 Q. -- changes to maps for HB1983?</p> <p>25 A. That's correct.</p>

Page 247	Page 249
<p>1 Q. So this would be an occasion where one</p> <p>2 legislator may be the lead on it, but they are</p> <p>3 authorizing another legislator to work on the bill</p> <p>4 with them?</p> <p>5 A. Or to provide information about the bill. It</p> <p>6 may not have been -- I can't recall if there was</p> <p>7 authorization to actually make changes to the bill or</p> <p>8 just to provide information about.</p> <p>9 Q. Gotcha. So you could receive information from</p> <p>10 someone else that you may or may not -- from another</p> <p>11 legislator that you may or may not actually implement</p> <p>12 in developing the map; is that fair to say?</p> <p>13 A. I would not characterize it in that such in this</p> <p>14 case. And in general, it might be a legislator</p> <p>15 authorizing -- having a range of authorizations that</p> <p>16 they could give. They could give just to provide a</p> <p>17 copy of the bill before it's filed to another</p> <p>18 legislator, it may be to provide authorization to make</p> <p>19 a change to the bill, or it might be an authorization</p> <p>20 to review to become a cosponsor of the bill.</p> <p>21 So there's a range of authorizations</p> <p>22 that could be granted. I don't remember if there was</p> <p>23 one on this one. And if there was, what type.</p> <p>24 Q. Gotcha.</p> <p>25 And the three exemplars of information,</p>	<p>1 shared the data from that with another member;</p> <p>2 however, that bill, that number that you gave me,</p> <p>3 whichever -- I can't -- again, I apologize for not</p> <p>4 being able to remember which one -- that bill I would</p> <p>5 take and create a whole new map for this new request,</p> <p>6 using the exact same coordinates, configuration, and</p> <p>7 then provide the data under that other member's name.</p> <p>8 Q. Gotcha. Okay.</p> <p>9 A. And so that's why I'm saying the range of</p> <p>10 interactions is very specifically private until that</p> <p>11 member gives a specific authorization for that action</p> <p>12 to occur.</p> <p>13 Q. Gotcha. Okay. Let's mark as Exhibit 44 --</p> <p>14 MX. BENJAMIN: 34.</p> <p>15 Q. -- 34 maps that are not Bates-stamped, that I</p> <p>16 will represent has the stamp for GIS also at the top</p> <p>17 left and have been marked as SB744.</p> <p>18 A. Yes.</p> <p>19 (Exhibit 34 marked for identification.)</p> <p>20 Q. Do you recall -- are you familiar with these</p> <p>21 images?</p> <p>22 A. In a very general sense that I know autoBound</p> <p>23 could produce this type of image.</p> <p>24 Q. And if I represent that Senate Bill S44, as</p> <p>25 proposed, was introduced by Senator Irvin, do you</p>
Page 248	Page 250
<p>1 those are exemplars. That's not the exclusive</p> <p>2 interaction you might have with a particular -- with</p> <p>3 multiple legislators on a particular piece of bill; is</p> <p>4 that fair?</p> <p>5 MR. TALLEY: Object. Form.</p> <p>6 (BY MS. ADEN:)</p> <p>7 Q. Let me ask another way: Earlier you described</p> <p>8 providing data to legislators about a proposed bill,</p> <p>9 so that is another way that you could have worked on a</p> <p>10 proposed map, besides taking instruction or besides</p> <p>11 sending -- sharing a copy of the map so that someone</p> <p>12 could potentially cosponsor it; is that fair to say?</p> <p>13 A. I would characterize it as two different things.</p> <p>14 The request that came in for additional information</p> <p>15 about Representative Speaks, it's viewed as its own</p> <p>16 independent request. So the same map would have been</p> <p>17 created under that member's name and then the data</p> <p>18 pulled from it. It would not technically be pulled</p> <p>19 from Representative Speaks' bill, or Representative --</p> <p>20 Senator English, I can't recall, but we would have</p> <p>21 created a whole new map under that member's requested</p> <p>22 name to create the demographic data.</p> <p>23 We viewed it very, very -- every piece</p> <p>24 of paper that's created for a member is created for</p> <p>25 that member alone. So, no, I would not have even</p>	<p>1 recall working on maps for Senator Irvin?</p> <p>2 A. I do not recall if I was the initial map drafter</p> <p>3 or if that was Ms. Bowen. I know I would have drafted</p> <p>4 final legislation on her behalf, but I can't remember</p> <p>5 if I took that request or if Ms. Bowen did.</p> <p>6 Q. And on the first two pages -- first page,</p> <p>7 there's an image of -- an image of SB744, followed by</p> <p>8 a table of contents, and then autoBoundEDGE snapshots</p> <p>9 of each of the districts; is that fair?</p> <p>10 A. That's the document in front of me, yes.</p> <p>11 Q. Okay. And similar to your earlier testimony,</p> <p>12 the different -- the snapshots indicated here are not</p> <p>13 ones that you would have produced in your work on</p> <p>14 preparing congressional maps?</p> <p>15 A. No, that's correct.</p> <p>16 Q. In your work with Senator Irvin, do you recall</p> <p>17 speaking to anyone who was -- do you recall speaking</p> <p>18 with any other legislator in preparation for maps for</p> <p>19 him?</p> <p>20 MR. TALLEY: For her.</p> <p>21 A. For her.</p> <p>22 Q. For her.</p> <p>23 A. I don't recall whether I spoke with Senator</p> <p>24 Irvin on this matter, and I definitely don't recall if</p> <p>25 I spoke with anyone else in the preparation of the</p>

Page 251	Page 253
<p>1 map.</p> <p>2 Q. And do you recall -- even if you did not prepare</p> <p>3 the demographic profile replicated here, do you recall</p> <p>4 preparing any other additional demographic profile in</p> <p>5 relation to SB744?</p> <p>6 A. Not that I recall.</p> <p>7 Q. Okay. Let's mark as Exhibit 35 -- I'm going to</p> <p>8 include two separate documents as part of Exhibit 35,</p> <p>9 the first is -- are images of House Bill 1982,</p> <p>10 Bates-stamped BLR-CMA-533 to 541. And similar to, I</p> <p>11 think, House Bill 741 from a bit ago, there is a jump</p> <p>12 in the Bates stamp number, and there is a separate</p> <p>13 range of 571 to 577 that we'll talk about.</p> <p>14 A. Okay.</p> <p>15 (Exhibit 35 marked for identification.)</p> <p>16 Q. And then the separate set of documents are</p> <p>17 Senate Bill 743, and there are two separate Bates</p> <p>18 ranges, BLR-CMA-549 to 557. And then there is a jump</p> <p>19 of BLR-CMA-560 to 566.</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Let's start with 1982.</p> <p>22 That is a bill proposed by</p> <p>23 Representative Speaks; is that accurate?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And if you turn to 571, it looks like</p>	<p>1 have been Ms. Bowen and I, if she touched it. I just</p> <p>2 don't recall which one, and at what point we may have</p> <p>3 made that swap of assistance as we were going through</p> <p>4 it.</p> <p>5 Q. And if you worked -- when you worked on HB1982,</p> <p>6 your work would have been in the legal computer room?</p> <p>7 A. That's correct. The only caveat is I don't</p> <p>8 remember if part of it was drafted in the plotting</p> <p>9 room.</p> <p>10 Q. Okay.</p> <p>11 A. Or if that was SB743. I know we were both</p> <p>12 working on the maps at the same time, so I don't</p> <p>13 recall who had what piece at what time. So it may</p> <p>14 have started there and then come to the legal room.</p> <p>15 So there may be a version saved there that then the</p> <p>16 updated version is saved on legal doc -- on the legal</p> <p>17 room. Or it might have been vice versa, I just don't</p> <p>18 recall.</p> <p>19 MR. TALLEY: And, Leah, I think when</p> <p>20 you're asking these questions about her work</p> <p>21 on these two pieces of legislation, what</p> <p>22 your questions are aimed at is specific to</p> <p>23 the actual mapmaking process because, of</p> <p>24 course, she also drafted the actual text of</p> <p>25 the legislation. So maybe that's a</p>
Page 252	Page 254
<p>1 that set of maps reflects HB1982, as amended, based</p> <p>2 upon, at least, what is titled on the top left-hand</p> <p>3 corner?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. And so is it fair to say that there was</p> <p>6 an original and as-amended version of House Bill 1982?</p> <p>7 A. Yes.</p> <p>8 Q. Did you work on HB1982?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Do you recall whether you worked on both</p> <p>11 its original and as-amended forms?</p> <p>12 A. I was involved. I cannot recall who, again,</p> <p>13 initiated the first drawing and outline of the map or</p> <p>14 the amendments. It may have been a simultaneous work</p> <p>15 between Ms. Bowen and I, as we were trying to work on</p> <p>16 the bills and the maps.</p> <p>17 There were a couple of times, and I do</p> <p>18 not remember who they originated with, but I had the</p> <p>19 map request. I would send it to Lori and say, "Can</p> <p>20 you get the preliminary lines drawn," and then it</p> <p>21 would come back to me. And I would maybe finish it up</p> <p>22 or work on another part of the bill draft. And then</p> <p>23 if I finished my bill drafting, I might go back and</p> <p>24 say, "Hey, I can take that one now."</p> <p>25 So I don't remember exactly. It would</p>	<p>1 distinction without a difference, but I</p> <p>2 wanted to point it out.</p> <p>3 (BY MS. ADEN:)</p> <p>4 Q. Can you tell me a little bit more about the</p> <p>5 plotter room and -- the plotter room?</p> <p>6 A. Absolutely. It was just -- in 2011, it was our</p> <p>7 understanding that the committees wanted giant blowups</p> <p>8 of the maps for presentation during the committee. We</p> <p>9 were prepared in case that was the request again by</p> <p>10 members. We had a short-term contract for a large</p> <p>11 computer plotter.</p> <p>12 That plotter could only be hooked in</p> <p>13 through our network to one computer, so we let that</p> <p>14 one remain in a kind of workroom area so that we could</p> <p>15 have that plotter connected to the computer Lori was</p> <p>16 going to be working with in the research division.</p> <p>17 Of course, there wasn't room in the</p> <p>18 legal division. So in that case, we would need to --</p> <p>19 the files were too large to just email. We would have</p> <p>20 to take a thumb drive and walk it over, put it in the</p> <p>21 computer, save it there so that you could then print</p> <p>22 it out on the big plotter, if we chose to.</p> <p>23 That was not something that was --</p> <p>24 everyone liked the smaller versions, so we ended up</p> <p>25 not having to use that, but we still had the ability</p>

<p>Page 255</p> <p>1 to use both of those computers. So if she needed a</p> <p>2 copy of that, we could take the thumb drive, take it</p> <p>3 to her, and she could start on the map and then bring</p> <p>4 it to me. And I would have all the information to put</p> <p>5 on the legal, but everything would be on one of those</p> <p>6 two computers.</p> <p>7 Q. And is the plotter in the map room?</p> <p>8 A. Yes.</p> <p>9 Q. Gotcha.</p> <p>10 So there are two rooms, the map room and</p> <p>11 the legal room, and the plotter is in the map room?</p> <p>12 A. Yes. It's a research room that has the big</p> <p>13 mapping plotter. That's what that is. And it had a</p> <p>14 computer station and it also has file cabinets and</p> <p>15 other things. But that's where we had room to put the</p> <p>16 giant mapping plotter.</p> <p>17 Q. And your work primarily occurred, though, up to</p> <p>18 this point at least, in the legal room?</p> <p>19 A. That's correct.</p> <p>20 Q. Okay.</p> <p>21 A. Which was a more traditional office setting with</p> <p>22 a chair for the member and the others a workroom.</p> <p>23 Q. You mentioned a thumb drive?</p> <p>24 A. Yes.</p> <p>25 Q. Was there one thumb drive you used to transmit</p>	<p>Page 257</p> <p>1 code; is that fair to say?</p> <p>2 A. I'm just checking to see where you're looking on</p> <p>3 the -- oh, on --</p> <p>4 Q. 560.</p> <p>5 A. Beginning at 560?</p> <p>6 Q. 560, yes.</p> <p>7 A. Yes, that's correct. 419 was a bill code of</p> <p>8 mine.</p> <p>9 Q. And does this reflect that there was an</p> <p>10 amendment to 743, just like there was to HB1982?</p> <p>11 A. I don't recall. I do not recall, or if it was a</p> <p>12 version that I had difficulty -- at times, autoBound</p> <p>13 had difficulty saving and if it did not want to save,</p> <p>14 I may have changed the name slightly to make sure that</p> <p>15 it would save. I don't recall if it was an amendment</p> <p>16 or if it was a save issue.</p> <p>17 Q. And so there are -- there's at least the</p> <p>18 original version of HB1982 and an amended version, and</p> <p>19 I believe an original version of Senate Bill 743</p> <p>20 that's introduced and then an amended version?</p> <p>21 A. And if I had the bill drafts in front of you, I</p> <p>22 could absolutely tell you. I just can't tell you from</p> <p>23 these map documents with this designation at the top.</p> <p>24 So if I -- if I saw the actual bill drafts, I could</p> <p>25 tell you exactly how it progressed and what the MLD</p>
<p>Page 256</p> <p>1 information back and forth between at least those two</p> <p>2 computers?</p> <p>3 A. I believe so. I had a thumb drive that I had a</p> <p>4 copy of each PDF saved on that legal room so that it</p> <p>5 could then be printed from my printer, my personal</p> <p>6 computer in my office -- Bureau computer, not personal</p> <p>7 computer. But, yes, because of the size of the PDFs</p> <p>8 and the maps.</p> <p>9 Q. And the -- what was on the thumb drive were PDFs</p> <p>10 of the proposed bills?</p> <p>11 A. Yes. The documents that you see before you</p> <p>12 right here.</p> <p>13 Q. Okay. But not drafts or other work product on</p> <p>14 the thumb drive?</p> <p>15 A. I can't recall if there were drafts that were</p> <p>16 not introduced maps.</p> <p>17 Q. And do you know whether any other BLR staff had</p> <p>18 a separate thumb drive with map information on it?</p> <p>19 A. If Lori had one, I don't recall.</p> <p>20 Q. Okay. Now, looking at Senate Bill 743, this is</p> <p>21 being proposed by Senator English; is that correct?</p> <p>22 A. That's correct.</p> <p>23 Q. Okay. And if you look at 560 in the top</p> <p>24 right-hand corner, it says Senate Bill 743-MLD419.</p> <p>25 This is the -- those are your initials and a bill</p>	<p>Page 258</p> <p>1 numbers were for both the bill draft and the</p> <p>2 amendment.</p> <p>3 Q. But as you were working, did you understand that</p> <p>4 HB1982 and Senate Bill 743 were the same maps being</p> <p>5 offered on different sides of the bodies?</p> <p>6 MR. TALLEY: I'll object to the extent</p> <p>7 it calls for some legislative communication.</p> <p>8 If you have personal knowledge, you can</p> <p>9 answer.</p> <p>10 A. After they were filed, yes, it was clear they</p> <p>11 were supposed to be concurrent bills.</p> <p>12 Q. But before they were filed, you were working on</p> <p>13 them as separate pieces of legislation?</p> <p>14 A. Always, yes.</p> <p>15 Q. Okay. And after they were filed and then they</p> <p>16 are later amended, are you working on them as separate</p> <p>17 amendments to those filed bills, or are they -- do</p> <p>18 they collapse into one map that you were working on?</p> <p>19 A. They are always worked as separate pieces of</p> <p>20 legislation; however, we were asked that they be the</p> <p>21 same amendment to the bills.</p> <p>22 Q. When you're working on HB1982, are you working</p> <p>23 in person with Representative Speaks?</p> <p>24 A. At times.</p> <p>25 Q. Are you working in person with other</p>

<p>Page 259</p> <p>1 legislators, alongside Representative Speaks?</p> <p>2 A. At times.</p> <p>3 Q. Are you working without Representative Speaks on</p> <p>4 maps for HB1982?</p> <p>5 A. No.</p> <p>6 Q. So as you're working on HB1982,</p> <p>7 Representative Speaks is always in the room or on the</p> <p>8 communication with respect to that -- those maps?</p> <p>9 A. Absolutely.</p> <p>10 Q. And any work that you're doing on HB1982, it is</p> <p>11 at the direction -- is either at the express direction</p> <p>12 of Representative Speaks or you are doing it on behalf</p> <p>13 of Representative Speaks?</p> <p>14 A. All changes or work is done at the express</p> <p>15 request of the legislator or the chief sponsor of that</p> <p>16 bill, which was Representative Speaks.</p> <p>17 Q. Okay. And is that the same for Senate Bill 743?</p> <p>18 You were doing work on Senate Bill 743 at the</p> <p>19 direction of Senator English?</p> <p>20 A. That's correct.</p> <p>21 Q. And are you working with other legislators</p> <p>22 besides Senator English on Senate Bill 743?</p> <p>23 A. At times.</p> <p>24 Q. And are you -- going back to 1982. I didn't</p> <p>25 finish my line of thought.</p>	<p>Page 261</p> <p>1 Representative Speaks or anyone else, is it fair to</p> <p>2 say that I would need to access your files in the</p> <p>3 legal room or hard copy files to do so?</p> <p>4 MR. TALLEY: Object to form. I'm not</p> <p>5 sure if I understand it. But as I</p> <p>6 understand the question, you're seeking the</p> <p>7 potential sources of information on who was</p> <p>8 involved or what was done with respect to a</p> <p>9 particular piece of legislation.</p> <p>10 I'll let the witness answer that</p> <p>11 question, provided -- I'll instruct her not</p> <p>12 to reveal the identities of any other</p> <p>13 members.</p> <p>14 And I'll also note that some of these</p> <p>15 documents are being withheld on privilege</p> <p>16 grounds.</p> <p>17 A. The only place any information I would have</p> <p>18 would be on the autoBound program that's on that legal</p> <p>19 computer, the saved map copies, and then my BLR</p> <p>20 computer or any hard copy files. There are not many,</p> <p>21 but any hard copy information.</p> <p>22 I believe I always kept a copy of the</p> <p>23 bill as it came out, and I double-checked counties and</p> <p>24 things of that nature. But anything would be in my</p> <p>25 hard copy files.</p>
<p>Page 260</p> <p>1 Outside of working in person or</p> <p>2 receiving information via email, are you communicating</p> <p>3 through other forms in order to draft maps for HB1982?</p> <p>4 A. There may have been phone calls involved. I</p> <p>5 don't recall at that point, but I believe there may</p> <p>6 have been phone calls.</p> <p>7 Q. Were those phone calls happening only in the</p> <p>8 legal room?</p> <p>9 A. Or my office, yes.</p> <p>10 Q. Okay. Did you have any conversation about</p> <p>11 HB1982 with anyone who wasn't a legislator or BLR</p> <p>12 staff?</p> <p>13 A. No.</p> <p>14 Q. Did you -- if I wanted to understand what</p> <p>15 information led to the development of HB1982 in its</p> <p>16 original or amended form, who would I need to speak to</p> <p>17 besides you?</p> <p>18 A. Representative Speaks.</p> <p>19 Q. Anyone else?</p> <p>20 MR. TALLEY: I'll object and instruct</p> <p>21 the witness not to reveal the identities of</p> <p>22 any other legislators.</p> <p>23 (BY MS. ADEN:)</p> <p>24 Q. If I wanted to know what information you had</p> <p>25 available to you in effectuating the choices of</p>	<p>Page 262</p> <p>1 Q. And would it also include what was told to you</p> <p>2 by Representative Speaks or any other legislator?</p> <p>3 A. I did not make any contemporaneous recordings of</p> <p>4 in-person contacts or voicemails or anything of</p> <p>5 that -- we don't have voicemail at the Bureau, so it</p> <p>6 would just -- I didn't record phone calls or anything</p> <p>7 of that nature.</p> <p>8 Q. And is that the same answer that you would give</p> <p>9 with respect to Senate Bill 743?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. As you were working on Senate Bill 743 or</p> <p>12 HB1982, did you consider any information from Dave's</p> <p>13 Redistricting?</p> <p>14 MR. TALLEY: I'll object and instruct</p> <p>15 the witness not to answer on legislative</p> <p>16 privilege grounds.</p> <p>17 (BY MS. ADEN:)</p> <p>18 Q. As you were working on HB1982 or Senate Bill</p> <p>19 743, did you visit Dave's Redistricting website?</p> <p>20 A. No.</p> <p>21 Q. As you were working on Senate Bill -- let me</p> <p>22 start with HB1982.</p> <p>23 As you were working on HB1982, can you</p> <p>24 tell me whether or not, consistent with your earlier</p> <p>25 testimony, you developed it by starting from the 2011</p>

Page 263	Page 265
<p>1 benchmark map or some other starting point?</p> <p>2 MR. TALLEY: I'll object and instruct</p> <p>3 the witness not to answer based on the</p> <p>4 grounds of legislative privilege.</p> <p>5 (BY MS. ADEN:)</p> <p>6 Q. And as you were working on Senate Bill SB743,</p> <p>7 based upon your earlier testimony, did you develop</p> <p>8 that map using the 2011 enacted map as a basis or some</p> <p>9 other process?</p> <p>10 MR. TALLEY: Same objection; same</p> <p>11 instruction.</p> <p>12 (BY MS. ADEN:)</p> <p>13 Q. I want to have you keep Exhibit 35 in front of</p> <p>14 you and then I want to mark as Exhibit 36 some images</p> <p>15 of precincts.</p> <p>16 A. Thank you.</p> <p>17 (Exhibit 36 marked for identification.)</p> <p>18 Q. There is an exhibit sticker indicating that this</p> <p>19 was introduced in another case on January 20 of 2023.</p> <p>20 Have you seen these -- this image</p> <p>21 before, Ms. Davenport?</p> <p>22 A. I don't believe I've seen this specific image,</p> <p>23 no.</p> <p>24 Q. What does this image appear to be to you?</p> <p>25 A. To me it looks like the portion of Pulaski</p>	<p>1 that gets into privilege.</p> <p>2 A. I was the scrivener who was operating the</p> <p>3 machine, moving the lines as directed.</p> <p>4 Q. And as directed by either Senator English or</p> <p>5 Senator -- or Representative Speaks?</p> <p>6 A. Depending on the map and which bill you're</p> <p>7 talking about, yes.</p> <p>8 Q. And if I wanted to know why these particular</p> <p>9 precincts were moved out of Congressional District 2</p> <p>10 into other congressional districts, who would I speak</p> <p>11 to?</p> <p>12 A. The sponsors of those bills.</p> <p>13 Q. And if I wanted to understand what information</p> <p>14 you had available to you on your computer screen as</p> <p>15 these precincts were being moved from Congressional</p> <p>16 District 2 to other districts, who would I speak to?</p> <p>17 A. I guess we would have to go back to the computer</p> <p>18 and open it up and load it like it is. I don't know.</p> <p>19 Or the sponsors may remember what's on that bottom</p> <p>20 ticker more than I do, but that's the only way. I</p> <p>21 don't recall, myself, what was exactly there.</p> <p>22 Q. And if I wanted to understand what criteria or</p> <p>23 requirements, if any, explained the choices that were</p> <p>24 being made in the development of HB1982 or Senate</p> <p>25 Bill 743, who would I speak to?</p>
Page 264	Page 266
<p>1 County that had precinct levels that were potentially</p> <p>2 moved out of Pulaski County.</p> <p>3 Again, I'd have to look at it at a very</p> <p>4 granular level to see if that's all of them, if that's</p> <p>5 part of them or -- the shape appears consistent with</p> <p>6 what was done, but I don't have the precinct numbers</p> <p>7 here to double-check that that's what it is.</p> <p>8 If I had the bill document, I could also</p> <p>9 check and see if that was a representation of the</p> <p>10 precincts moved.</p> <p>11 Q. Perfect.</p> <p>12 A. But...</p> <p>13 Q. And if these were the precincts moved out of</p> <p>14 Pulaski County in the enacted map, would you have been</p> <p>15 someone who would have moved those precincts out of</p> <p>16 the district in effectuating the enacted map?</p> <p>17 MR. TALLEY: As I understand the</p> <p>18 question, it's asking whether Ms. Davenport</p> <p>19 was the individual was the individual within</p> <p>20 the autoBound software pulling out the</p> <p>21 precincts and moving them around to</p> <p>22 effectuate or to create the map.</p> <p>23 I'll let her answer that question and</p> <p>24 just instruct her not to go into the why or</p> <p>25 at whose direction, or anything like that</p>	<p>1 A. The sponsor of the legislation.</p> <p>2 Q. If I wanted to understand the intent behind the</p> <p>3 development of what becomes the enacted congressional</p> <p>4 map, who would I speak to?</p> <p>5 A. The sponsors of the legislation.</p> <p>6 MR. TALLEY: I'll just note, again, for</p> <p>7 our record, both Representative Speaks and</p> <p>8 Senator English have invoked legislative</p> <p>9 privilege in this action and that is why</p> <p>10 Ms. Davenport, at my instruction, is not</p> <p>11 revealing that information.</p> <p>12 (BY MS. ADEN:)</p> <p>13 Q. And if I wanted to understand why any lines were</p> <p>14 changed between the 2011 enacted congressional map and</p> <p>15 what becomes the 2021 enacted map, who would I speak</p> <p>16 to to understand why those changes were made?</p> <p>17 A. All the members of the legislative body that</p> <p>18 voted for the bill. I mean, I have no other</p> <p>19 knowledge, other than they made that decision and</p> <p>20 adopted that final map in that manner.</p> <p>21 Q. Okay. And if I wanted to understand whether or</p> <p>22 not the construction of the enacted map is explained</p> <p>23 by population balance, rebalancing, or consideration</p> <p>24 of political boundaries, or race, or political goals,</p> <p>25 who would I speak to in order to understand that?</p>

<p>Page 267</p> <p>1 A. My understanding would be the members of the 2 legislative body that voted for it.</p> <p>3 Q. As you were working on HB1982 and SB743, were 4 you aware at any point that then Governor Hutchinson 5 had concerns about the plans prior to their adoption?</p> <p>6 A. No, I had no contact with anyone from the 7 governor's office.</p> <p>8 Q. Did you have contact with Senator Rapert around 9 HB1982 or Senate Bill 743?</p> <p>10 MR. TALLEY: I'll let her answer that to 11 explore the contours of the privilege, but I 12 instruct her just answer "yes," "no," "I 13 don't remember," and not anything further.</p> <p>14 A. I don't remember.</p> <p>15 Q. If you had contact with Senator Rapert around 16 Senate Bill 732 or HB1982, would you have a record of 17 that on your legal -- in the legal room or in your 18 hard copy files?</p> <p>19 MR. TALLEY: Object. Form.</p> <p>20 A. It would not be in the legal room. It would be 21 on my BLR-issued computer. Hard copy -- but I can't 22 recall if there was a phone call. There would not be 23 a record if there had been a phone call.</p> <p>24 Q. And do you recall whether there was a phone call 25 with Senator Rapert around Senate Bill 743 or HB1982?</p>	<p>Page 269</p> <p>1 respective committees.</p> <p>2 MR. TALLEY: Given that response, I will 3 withdraw that prior objection as to 4 Representative Tosh, if you want to reask 5 that question of whether you had contact 6 with him, you know, with respect to these 7 two pieces of legislation.</p> <p>8 I'll allow her to answer it "yes," "no," 9 "I don't know," based on that foundation, 10 but I'm not going to let it go any further 11 than that.</p> <p>12 (BY MS. ADEN:)</p> <p>13 Q. Did you have contact with Representative Tosh 14 around HB1982 or Senate Bill 743?</p> <p>15 A. Not specifically regarding those two pieces of 16 legislation.</p> <p>17 Q. Did you have contact with Representative Tosh 18 about earlier proposed bills around congressional 19 redistricting?</p> <p>20 A. I had contacts with Representative Tosh over the 21 general process and ensuring that the committee had 22 the maps that were needed for each bill, and there 23 were different communications.</p> <p>24 MR. TALLEY: I'll shut you off there.</p> <p>25 THE WITNESS: Okay.</p>
<p>Page 268</p> <p>1 A. I do not recall.</p> <p>2 Q. Do you recall working with Representative Tosh 3 in relation to HB1982 or Senate Bill 743?</p> <p>4 MR. TALLEY: All right. I'm going to 5 jump in and instruct the witness not to 6 answer for the same reasons yesterday. Now 7 we're getting into the roll call of who was 8 potentially involved.</p> <p>9 So I think I gave a little bit of leeway 10 to explore that, and I'll instruct the 11 witness not to answer now.</p> <p>12 (BY MS. ADEN:)</p> <p>13 Q. Who did you understand to be the legislative 14 leaders of the Senate and House committees charged 15 with ushering congressional redistricting through?</p> <p>16 A. Actually, I don't exactly think this is 17 completely responsive, but I don't know of anyone who 18 was charged with ushering through.</p> <p>19 Representative Tosh is the chairperson 20 of the House State Agencies committee, and Senator 21 Rapert is the Chairperson of the Senate State Agencies 22 committee, but it was not a separate charge to usher 23 the legislation through. It was -- they were the ones 24 who were assigned to hearing the redistricting bills, 25 and they were the established chairpersons of those</p>	<p>Page 270</p> <p>1 MR. TALLEY: We don't intend to disclose 2 any communications, any contact, the 3 contents of them. We're just exploring the 4 contours of the privilege.</p> <p>5 MS. ADEN: Okay. I need -- yes, I need 6 ten minutes, if I may have that, to just 7 make sure I don't have anything else, and 8 I'll come back earlier if I don't.</p> <p>9 THE WITNESS: Okay.</p> <p>10 MS. ADEN: Just to make sure that 11 there's nothing I've left on the table.</p> <p>12 MR. BRASCHER: No worries.</p> <p>13 (Recess from 4:02 p.m. to 4:13 p.m.)</p> <p>14 (BY MS. ADEN:)</p> <p>15 Q. Ms. Davenport, I -- over the course of the day, 16 I think I understood that you had a role preparing 17 maps, as well as drafting the bill text for those 18 maps; is that fair to say?</p> <p>19 A. That is very fair to say.</p> <p>20 Q. Did you ever work directly to prepare bill text 21 without first preparing a map for the text?</p> <p>22 A. No.</p> <p>23 Q. Earlier today, you talked about some of the 24 means of communication in developing congressional 25 maps.</p>

Page 271	Page 273
<p>1 Did you ever text or receive texts about</p> <p>2 congressional redistricting?</p> <p>3 A. No.</p> <p>4 Q. And in this case, the BLR has produced a</p> <p>5 privilege log, one dated April 25th, 2024, and there</p> <p>6 is an email sent by you to esotallaro@gmail.com</p> <p>7 without a name associated with it.</p> <p>8 Are you familiar with who that is?</p> <p>9 A. No, I am not.</p> <p>10 Q. That email also copied, I believe, someone named</p> <p>11 Loyd Taylor at BLR.</p> <p>12 Does that give you any indication about</p> <p>13 who "esotallaro" might be?</p> <p>14 A. It's Taylor Loyd and she was our educating --</p> <p>15 she's our education drafting attorney. So she's</p> <p>16 another Bureau staff member.</p> <p>17 So, no, I don't know who the other</p> <p>18 person is.</p> <p>19 Q. Okay.</p> <p>20 MS. ADEN: That will -- I think that is</p> <p>21 it. Or that is it. Those are my three</p> <p>22 words. There you go.</p> <p>23 MR. TALLEY: I'm checking that privilege</p> <p>24 issue real fast.</p> <p>25 MS. ADEN: It was page 23 of 28.</p>	<p>1 Q. Sure.</p> <p>2 A. So in my past capacity, no, I treated all</p> <p>3 members the same regardless of partisan affiliation.</p> <p>4 Q. And so specifically when you were map drawing</p> <p>5 and writing the legislation for these bills that the</p> <p>6 maps were representations of, did you do anything</p> <p>7 different in that capacity, whether the legislator was</p> <p>8 a Democrat or a Republican?</p> <p>9 A. No.</p> <p>10 Q. Did you exercise any discretion in the maps that</p> <p>11 were drawn?</p> <p>12 A. None.</p> <p>13 MR. BRASCHER: That is all I have.</p> <p>14 MR. TALLEY: I have no questions.</p> <p>15 MS. ADEN: Thank you for your time,</p> <p>16 Ms. Davenport.</p> <p>17 And thank you, Ms. Hayden, for your</p> <p>18 work.</p> <p>19 MR. TALLEY: The witness will read and</p> <p>20 sign.</p> <p>21 THE WITNESS: Yes, I will.</p> <p>22 MS. ADEN: And just for the record, I do</p> <p>23 want to make clear that I don't think we</p> <p>24 have resolved our disputes over legislative</p> <p>25 privilege, and for that reason, I would like</p>
Page 272	Page 274
<p>1 MR. TALLEY: I'm seeing if I can find</p> <p>2 it. I'll show if I can find the original.</p> <p>3 You go ahead.</p> <p>4 MR. BRASCHER: I just have a couple</p> <p>5 questions.</p> <p>6 THE WITNESS: Absolutely.</p> <p>7 EXAMINATION</p> <p>8 BY MR. BRASCHER:</p> <p>9 Q. Okay. So you've been asked a lot of</p> <p>10 hypothetical questions today. Do any of your answers</p> <p>11 reveal an intent on your part to disclose any actual</p> <p>12 communications that you had with legislators?</p> <p>13 A. No.</p> <p>14 Q. What about any actual interactions that you had</p> <p>15 from legislator -- had with legislators?</p> <p>16 A. No.</p> <p>17 Q. Have you had any intent to reveal any privileged</p> <p>18 communications that you had with legislators today?</p> <p>19 A. No.</p> <p>20 Q. In your capacity working for BLR, do you do</p> <p>21 anything different depending on whether the legislator</p> <p>22 is a Democrat or a Republican?</p> <p>23 A. I do not.</p> <p>24 I will clarify, I do not work for BLR</p> <p>25 any longer.</p>	<p>1 the record to reflect that we are leaving</p> <p>2 this deposition -- I would like to leave</p> <p>3 this deposition open in the event that any</p> <p>4 change in your position on legislative</p> <p>5 privilege or ours changes the questions that</p> <p>6 I had available to answer -- to ask and be</p> <p>7 answered today.</p> <p>8 MR. TALLEY: I understand your position.</p> <p>9 We disagree with it. We disagree that it</p> <p>10 should be left open. And we'll just move</p> <p>11 forward.</p> <p>12 MR. BRASCHER: Sounds good. We'd like</p> <p>13 to order an E-Transcript of today.</p> <p>14 MR. TALLEY: We can go off the record.</p> <p>15 THE COURT REPORTER: Okay. We're off</p> <p>16 the record.</p> <p>17 (Proceedings adjourned at 4:18 p.m.)</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>

REPORTER CERTIFICATION

I, DANA HAYDEN, Certified Court Reporter for the State of Arkansas, do hereby certify to the following:

1) that on 07/02/2024, the witness, MICHELLE DAVENPORT, was duly sworn by me prior to the taking of testimony as to the truth of the matters attested to and contained therein;

2) that the foregoing pages contain and are a true and correct transcription of the proceedings as reported verbatim by me via realtime stenography to the best of my ability and transcribed at or under my direction and supervision, and subject to appropriate changes submitted by witness, if any, during his/her requested reading and signing of this deposition according to the Federal Rules of Civil Procedure;

3) that I am neither counsel for, related to, nor employed by any of the parties to the action in which this proceeding was taken; and that I am not a relative or employee of any attorney employed by the parties hereto;

4) that I am not financially interested or otherwise interested in the outcome of this action that affects or has substantial tendency to affect impartiality or requires me to relinquish control of

1 an original or copies of a deposition transcript
2 before it is certified, or that requires me to provide
3 any service not made available to all parties to the
4 action; and

5 5) that I have no contract with the parties,
6 attorneys, or persons with an interest in the action;
7 and that I am not knowingly identified on a preferred
8 provider list, whether written or oral, for any
9 litigant, insurance company, or third-party
10 administrator involved in this matter;

11 6) that signature of the witness is waived.
12 This transcript is prepared at request of counsel for
13 PLAINTIFF, and all fees are billed directly to them in
14 compliance with Arkansas Board of Court Reporter
15 Examiners Regulations Section 19.

16 Witness my hand and seal this 16th of
17 July, 2024.

18
19 _____
20 DANA HAYDEN, CCR, RMR, CRR, CRC
21 LS Certificate #714, State of Arkansas
22 Arkansas Realtime Reporting
23 1130 E Millsap Rd
24 Fayetteville AR 72703
25 479-301-2040
www.ArkansasRealtimeReporting.com

1 - - -

2 E R R A T A S H E E T

3 - - -

4

5 PAGE LINE CHANGE

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

25 _____

1 ACKNOWLEDGMENT OF DEPONENT

2

3 I, , do hereby
4 certify that I have read the foregoing pages and
5 that the same is a correct transcription of the
6 answers given by me to the questions therein
7 propounded, except for the corrections or
8 changes in form or substance, if any, noted in
9 the attached Errata Sheet.

10

11

12

13

14

15 _____
Date Signature

16

17

18

19

20

21

22

23

24

25

WORD INDEX

< 0 >

00220 164:7

07/02/2024 275:5

< 1 >

1 4:4, 6 67:10 89:7,

13 123:14, 18 124:7

125:10, 15 126:24

159:3, 18, 20 160:2

164:3 168:18 242:13

244:18 275:5 277:1

278:1

10 5:2 31:12 117:1

174:13, 17 277:1

278:1

10/4/2021 235:21

10:19 74:2

10:33 74:2

10006 2:5

104 4:6

11 5:5 175:11, 15

277:1 278:1

11:53 136:18 137:2

1130 276:21

114 4:17

12 5:5 176:7, 10

277:1 278:1

12:41 137:2

12:56 114:15

13 5:5 117:7 176:16,

19 277:1 278:1

134 17:20

135 4:19 16:15

17:16 18:18 19:14

58:11

137 4:20

14 5:9 32:22 117:12

183:15, 18 277:1

278:1

145 4:20

14-ish 31:15

14th 2:16

15 5:9 186:25 187:4

277:1 278:1

16 194:20 277:1

278:1

160 4:23

1627 4:19 135:2

165 4:24

16th 113:24 276:16

17 5:12 198:17, 20

277:1 278:1

1700 2:12

172 5:2

174 5:2

175 5:5

176 5:5

18 5:12 205:4, 6

277:1 278:1

1800 3:4

183 5:9

187 4:20 5:9 137:11

19 5:15 207:18, 22

276:15 277:1 278:1

1959 4:20 137:10, 19,

20, 25 138:3, 10

140:23 141:21

142:25 144:1, 14, 21

1961 167:24

1964 183:16

1965 196:2 198:7

1968 214:21, 25

1971 220:20 221:9

227:13

1976 25:2 230:5

1978 233:17

1979 241:3, 5

198 5:12

1981 243:25

1982 6:15 251:9, 21

252:6 259:24

1983 245:3

1998 25:13

< 2 >

2 4:5, 6 67:12 91:14,

19, 22 92:18 104:12,

16 107:23 120:8

123:19, 25 124:7

142:25 244:15, 16

265:9, 16 275:9

277:1 278:1

2:37 220:17

2:52 220:17

20 5:15 47:11 68:1

112:25 162:1, 9

163:13 164:18 210:3,

7 263:19 277:1

278:1

200 2:22

20005 2:16

2001 30:7

2003 15:14

2010 54:10 122:17

2011 35:23 44:16

45:9 54:13 64:25

67:16, 19, 22, 24

74:22 87:21 88:4, 9,

15, 16 89:5, 6, 20

90:5, 20 94:11 95:6

96:8 97:14, 20

105:16, 20 106:6, 8, 9

112:16, 20, 24 113:3

123:7 162:1 170:23,

25 182:8 254:6

262:25 263:8 266:14

2017 15:14, 21, 24

16:1 33:8

2019 44:17 45:10

202 2:17

2020 33:4, 20, 23

36:22, 24 45:21

47:11 58:18 67:22

71:15 75:6, 10, 12

76:23 85:11 90:21

106:10 112:20, 21

113:2 122:16, 17, 23

123:2 124:11 143:19

152:20 155:23

178:24 241:12

2021 22:24 23:7

24:17 37:8 38:20

48:10 59:13, 25 70:7

104:14 106:11

113:24 114:8 170:12

266:15

2022 59:25

2023 15:23 263:19

2024 1:13, 19 4:2

271:5 276:17

205 5:12

207 5:15

21 5:18 212:9, 13

277:1 278:1

210 5:15

212 2:5 5:18

214 5:18

216 5:2, 21 172:6

21st 227:1

22 5:18 214:14, 16

277:1 278:1

220 5:24

221 164:7

222 164:7

223 164:7

224 4:22 145:13

226 6:2

23 5:21 215:25

216:2 271:25 277:1

278:1

230 6:2

233 6:5

235 4:24 6:5 165:3,

21

24 5:21 55:25

216:18, 20 277:1

278:1

240 6:8

243 6:9

244 6:9

245 6:12

249 5:5 6:12 175:13

25 5:24 220:19, 24

277:1 278:1

251 6:15

256 5:4 174:15

25th 114:8 271:5

26 6:2 226:20, 23

229:7

263 6:17

27 6:2 230:4, 7

272 4:6

275 4:6

28 6:5 233:16, 18

271:25

283 5:9 183:16

28th 2:8

29 6:5 234:25 235:3

290 5:8 176:17

299 5:11 187:2

< 3 >

3 1:13 4:2, 17

113:21 114:4, 5, 10

123:18 124:5 169:8

216:25 275:17 277:1
278:1
30 6:8 29:3 240:9,
13 242:24 243:5
31 6:9 242:22, 23
243:7, 9
31st 104:13 106:11
32 6:9 243:24 244:3
323 2:22 195:5
33 6:12 245:2, 5
334 5:14 205:5
34 6:12 249:14, 15,
19
341 5:15 207:20
342 5:5
35 6:15 251:7, 8, 15
263:13
354 5:17 210:5
36 6:17 263:14, 17
360 214:1
366 5:18 212:11
382 5:20 214:15
3rd 1:19

< 4 >
4 4:19 123:18 124:7
135:1, 3 159:12
216:25 244:14
275:22 277:1 278:1
4:02 270:13
4:13 270:13
4:18 1:20 274:17
4:23-cv-471-DPM-
DRS-JM 1:6
40 2:4
400 221:8
407 220:22 221:8
414 219:5, 21
415 2:9 216:24
217:25 218:14
219:11, 21
416 5:23 216:19
419 257:7
42 120:8
424 5:21 216:1
425 1:22 3:4
431 5:12 198:19
44 249:13
445 6:2 226:21

449 220:23
451 242:6
454 6:8 240:15
458 6:4 230:5
459 221:10 222:3
465 220:23
479-301-2040 276:22
481 6:5 233:17
494 6:7 235:1

< 5 >
5 4:20 137:9, 13
276:5 277:1 278:1
501 2:23 3:5
524 6:9 243:8
532 6:11 244:2, 12
541 6:16 251:10
548 6:12 245:3
557 251:18
560 256:23 257:4, 5,
6
566 251:19
571 6:16 251:13, 25
577 6:16 251:13
592 113:21

< 6 >
6 4:20 145:12, 14
155:20 163:24
170:12 276:11 277:1
278:1
600 2:16
610 2:12
682-1300 2:17
683-2520 2:23
688-8806 3:5

< 7 >
7 4:6, 23 115:15
155:18 160:15, 17
277:1 278:1
700 2:16
714 276:20
720 160:20
721 172:13
72201 2:23 3:5
724 176:9
725 204:21
726 204:22

727 205:21
72703 276:22
728 207:20
729 212:16 213:10,
15
732 267:16
741 226:21 229:13
251:11
743 251:17 256:20
257:10, 19 258:4
259:17, 18, 22 262:9,
11, 19 265:25 267:9,
25 268:3 269:14
743-MLD419 256:24

< 8 >
8 4:24 165:2, 9
277:1 278:1
8/25/2021 4:17
8/31/2021 4:6
80 73:20
823-7138 2:13
877 4:6 89:9, 19
89 4:6

< 9 >
9 5:2 116:13 172:4,
8 277:1 278:1
9/20 178:1
9/24 214:1
9:00 1:19
92660 2:12
94111 2:9
949 2:13
965-2200 2:5
984-8864 2:9

< A >
a.m 1:19 74:2 137:2
ability 80:13 84:19
96:14 102:11 114:2
120:9 140:25 153:13
154:18 217:13
254:25 275:12
able 9:17 57:9, 10
97:4 103:9, 15 104:5,
10 142:1, 8 147:25
153:5, 15 155:5
160:11 218:14 249:4
above-styled 1:18

Absolutely 7:14 9:19
10:22 15:20 31:23
32:14, 17, 24 33:11
49:8, 14 58:1 61:12
69:3 80:19 96:11
98:6 122:24 177:11
181:10, 12 203:21
206:19 211:24 254:6
257:22 259:9 272:6
acceptable 8:22 66:9
125:17
accepted 160:2
access 18:11 52:17
54:1, 7 55:4 60:3
70:2 76:11 81:7, 10
97:8 111:15, 17
115:2 261:2
accessing 115:1
accomplish 75:2
80:22
account 31:7, 8, 10,
14, 16, 17
accounts 31:4
accurate 76:20
162:11, 12 169:16
237:17 251:23
accurately 106:21
107:4 110:21 114:21
acknowledged 90:12
acknowledging 135:6
ACKNOWLEDGMEN
T 278:1
act 36:2 59:24 61:4
136:5
acting 194:12
action 187:14
249:11 266:9 275:18,
23 276:4, 6
actions 9:11
active 68:17
actively 134:9
activity 129:2 194:13
actual 21:1 34:11
43:11 47:17 75:9
84:8 90:1 110:11
121:22 139:22 140:2
184:5 253:23, 24
257:24 272:11, 14
add 191:9, 14
added 35:6

<p>addition 11:13 39:2 46:9 76:1 79:9 206:15, 20 additional 17:7, 8 28:3 56:4 81:6 164:16 178:3, 5 187:13 188:25 189:10, 14, 17 190:25 199:19 228:24 246:8 248:14 251:4 address 228:17 addressed 69:8 122:23 addresses 79:10, 19 158:24 Aden 2:3 4:6 7:5, 8, 16 8:11, 16, 17 30:19 32:6 36:3 64:7 73:25 74:3 85:24 95:3 98:21 99:5, 11 100:1, 7, 15, 23 107:12 110:1, 13 111:4, 14 112:10 118:15 129:14 130:12 136:7, 17 137:3 139:10 142:22 144:8 149:1, 21 152:4 155:17 159:9 160:18 162:7, 8, 15, 17 165:20 179:18 180:17, 23 181:20 182:15 183:9, 14, 23 184:2, 7 186:21 188:19 189:5, 13 190:23 191:18 193:14 194:14, 23 195:1, 3 197:3 199:15 200:12 201:18 202:16 213:13 216:21 220:15, 18 224:18 226:19 236:20 237:7 240:14 242:21 243:4 248:6 254:3 260:23 262:17 263:5, 12 266:12 268:12 269:12 270:5, 10, 14 271:20, 25 273:15, 22 adequate 46:20</p>	<p>adjacent 28:2 adjourned 274:17 administration 15:7 Administrative 136:5 administrator 276:10 adopted 231:4 232:15 236:10 266:20 adoption 267:5 advance 58:4 advantage 160:9 advice 11:15, 18 advise 133:8 136:18 advising 58:8 134:14 affect 275:24 affiliation 193:23 273:3 African 117:1, 12 168:20 242:11 Agencies 33:12, 14, 16, 19 38:16 40:9, 21 42:20 58:6 126:18 137:18 160:25 170:13 171:5 177:2, 7 268:20, 21 agency 16:4 ago 12:18 15:22 236:25 251:11 agree 10:22 agreed 90:16 ahead 28:20 30:18 48:19 52:22 86:22 98:13 102:5 109:6, 14, 20 110:8 119:3 126:3, 21 131:3 133:17 137:22 138:5 157:7 179:17 186:13 211:23 220:7 272:3 aimed 253:22 al 1:3 7:9, 10 alerted 20:12 allegation 21:5 allegations 24:1 alleged 21:2 ALLIANCE 1:3 21:15 22:5 allow 77:14 82:19, 21 118:13 131:10 133:11 139:4 158:4,</p>	<p>12, 20 218:24 269:8 allowable 134:10 allowed 67:16 85:10 112:16 113:7 115:23, 25 136:15 188:23 allowing 145:17 alluvial 28:3 29:2 alongside 105:24 259:1 amended 20:1 221:15, 22 226:10 252:1 257:18, 20 258:16 260:16 amendment 42:6, 9 221:11, 23 222:10 257:10, 15 258:2, 21 amendments 252:14 258:17 American 29:15 44:17 45:9 72:7 117:1, 12 168:20 242:11, 12 amount 242:15 analyses 157:3 analysis 16:22 156:18, 23 157:17 159:19 202:12 218:17 analyst 184:22, 25 and/or 66:25 104:6 139:13 174:23 175:22 191:4 195:19 196:1, 8 205:18 206:5 229:22 233:14 246:13 answer 9:2, 8, 22 10:12 12:6 49:11 77:21 82:21, 24 83:8, 9 86:17 93:24 95:24 98:10 99:3, 23 101:19, 21 102:6 103:2 107:11, 20, 24 108:17 109:3 110:24 112:8 117:15, 20, 23 118:5, 13 126:1, 19 128:23 129:1, 3, 12 130:25 131:11 132:12 133:12 138:16 142:12 145:10 148:21</p>	<p>149:16, 20 151:24 152:9 154:6 155:4 159:10 162:4 166:15 171:6 179:11, 15 180:15 181:9, 19 182:13, 22 183:2, 8 186:15 188:17 190:7 191:16 193:5 194:9 199:18 200:8 201:4, 23, 25 202:4 211:19 217:11 218:25 220:4 223:23 225:8 227:17, 22 242:19 258:9 261:10 262:8, 15 263:3 264:23 267:10, 12 268:6, 11 269:8 274:6 answered 166:12 217:9 274:7 answering 10:19 109:1 answers 272:10 278:1 anticipated 56:15 anybody 55:15 77:13 anymore 81:24 APA 136:3, 4 Apavel@omm.com 2:13 apologies 163:15 apologize 12:5 136:6 146:13 249:3 appear 137:17 139:7 173:13 241:25 263:24 appearance 7:18 APPEARANCES 2:1 3:1 4:5 appears 34:21 91:14 148:18 165:14 219:6 264:5 applied 190:16 apply 69:7 133:10 appointment 52:18, 24 approach 41:5 approached 41:9 appropriate 94:8 275:13</p>
---	---	---	--

<p>approximately 14:8 15:21, 24 49:9 208:18 April 271:5 AR 276:22 archived 63:14 area 19:7, 11 28:2 29:23 33:22 89:1 101:10 218:14 254:14 areas 19:17 28:24 33:11, 15 40:16 42:16 68:18 100:18 101:2 102:22 103:11 187:14 arena 24:12 134:23 ARKANSAS 1:2, 8, 21, 23 2:20, 22, 23 3:5 8:4 11:20, 23, 25 15:2 16:5 18:6 19:19 21:9, 10 25:4, 6, 8, 9, 11, 14, 17, 20, 21 26:4, 7, 25 27:6, 8, 10, 13, 17 28:8, 12 29:8, 9 30:14 32:3 35:3 39:5 40:12 43:25 46:24 59:24 63:12 66:4 74:13 79:22 80:6 89:20 113:11, 16 123:3, 4 124:13, 22 127:18 128:12 131:24, 25 132:4, 14, 17, 18 133:23 135:13, 18 136:10 275:3 276:14, 20, 21 arm 16:5 as-amended 252:6, 11 Ashley 2:11 Asian 168:20 242:11 asked 10:18 53:21 54:5 87:2 108:2 111:24 115:6 119:24 141:5 151:23 158:23 164:18 193:10 198:11 217:5 218:21 225:12 229:1 258:20 272:9</p>	<p>asking 9:17 118:17 141:10 159:7 189:19 202:8 253:20 264:18 aspect 19:12 111:9 aspiration 130:10 aspirations 179:9 Assembly 53:13 70:6 109:11, 23 118:4 119:8 120:21 125:10 126:12 133:9 150:16 165:18 217:11 asserted 150:21 assess 82:19 140:25 151:25 assesses 151:6 assessing 182:16 assessment 151:8 158:4, 13, 21 159:6 160:12 182:19 183:1, 3 201:10 assigned 33:13, 17 43:7 153:6 268:24 assignments 41:10 125:7 assistance 61:13 253:3 assistant 36:11 61:19 assisted 166:25 245:20 associate 72:22 associated 96:13 123:7 138:25 140:6 144:21, 25 146:2 162:18, 22 163:10 165:25 167:6 172:13 173:19 175:12 176:23 178:14 187:7 188:1, 3 198:25 204:16 212:4 218:11, 19 236:11 271:7 association 21:22 72:24 assume 9:22 115:25 assuming 36:16 163:16 213:20 assumption 20:25 21:3 attached 165:5</p>	<p>222:14 278:1 attachment 105:24 attend 25:19 39:5 41:16, 19, 20 170:16 attendance 41:14 207:12 attended 37:15 39:13 41:2, 12 69:17 159:23 attending 46:10 57:20 attested 275:7 Attorney 2:22 8:4 23:18, 23 24:13 36:15 39:3 40:18, 21, 24 41:2, 5 51:20 52:3 271:15 275:20 attorneys 11:5, 16, 19, 22, 25 40:16 276:6 audibly 9:9 August 38:20 48:8 104:13 106:11 113:23 114:7 authorization 247:7, 18, 19 249:11 authorizations 247:15, 21 authorized 18:20 197:9 246:16, 19 authorizing 247:3, 15 autoBound 44:8, 11 45:24 46:12, 16 51:22 65:22, 24 76:11 77:5 79:7 80:21 86:25 89:25 96:15 102:16 103:5, 20 104:3, 4 112:15 115:1 143:15 144:11 147:4, 5, 6 152:19 156:13 157:14 158:3 161:20 178:22 190:12 191:8, 10, 12 232:19 241:18 249:22 257:12 261:18 264:20 autoBoundEDGE 44:14 74:7, 21 79:15, 20 84:9, 19, 22 85:2 86:9 92:8 93:13 95:10 100:24 101:4</p>	<p>102:11 103:9, 14, 24 104:8 113:8 114:3 115:23 117:17 119:23, 25 159:12 168:25 178:23 179:3 180:3 185:12, 24 188:6, 8 189:7, 15 191:1 197:16, 20, 24 198:3 199:12, 20 200:15, 21 201:20 204:1, 12 208:24 223:20 240:3, 7 242:2 250:8 automatically 159:14 availability 118:19 241:18 available 17:9 44:3, 12, 13 53:4, 9 63:7, 13, 22 64:23 67:20, 25 68:4 69:20, 22, 23 74:6 77:6 79:10, 13, 14, 20 80:15, 21, 25 81:1, 11, 13 84:13, 15, 21, 25 85:1, 18 92:6, 9 102:20 113:2, 15, 19 117:13 120:3, 5, 17, 19 127:17 143:23, 25 144:9, 11 146:24 152:6 153:16, 17 161:17 163:19, 22 167:9, 13 170:7, 19 172:22 178:19, 25 179:8 180:5 185:12, 13 188:5, 7 189:7 190:11 191:12 195:22 198:2, 3 199:12, 21 201:19 223:20 240:7 260:25 265:14 274:6 276:3 avoid 127:9 132:14 avoiding 131:17 132:6, 12, 24, 25 133:25 158:19 aware 20:22 21:7 22:22 24:8 30:23 36:21 53:11 69:13 85:15 87:8, 11 89:21 98:16 102:23 109:10 118:23 124:15, 25 125:16 127:5 128:15,</p>
---	---	--	--

<p>16 134:2 137:5 155:15 156:17 165:17 170:12, 14, 23 226:4 227:1, 12 230:25 267:4 awareness 81:15 Awesome 222:2</p> <p>< B ></p> <p>back 29:3 37:6, 19 45:17 56:9 62:1 63:14 68:5 86:5 91:4 112:19, 24 113:25 114:16 115:7 123:11 127:23 155:19 163:14, 24 169:6 186:14 200:24 201:19 211:11, 12 226:25 231:11 232:25 252:21, 23 256:1 259:24 265:17 270:8 background 24:24 128:4 backup 36:15 42:20, 21 bad 9:14 243:2 balance 266:23 balanced 124:6 balancing 124:10 126:6 bar 134:18 barred 30:11, 13 base 133:5 191:8 based 21:3, 4 46:22 68:8 75:10 82:24 92:7 95:7 98:2 99:3 103:8, 14 104:3 106:6, 8, 9, 10, 15 107:13 108:6, 10, 17 110:24 111:6 112:8 118:2, 18 122:16 123:6, 24 128:12, 23 129:12 130:3 134:6 139:11 140:5 141:1 143:19 148:22 149:20 150:2, 10 162:4 165:14 170:17 179:15 180:16 182:13, 22 183:7</p>	<p>188:17 194:11 200:24 225:1 244:22 252:1 263:3, 7 269:9 baseline 94:11, 13 basic 8:24 basically 66:20 basis 16:14 17:25 28:23 29:4 68:11 126:4 127:14 134:2 152:17 203:6 263:8 Bates 220:22 221:7 251:12, 17 Bates-stamped 6:14, 15 89:8 110:3 114:6 137:10 160:16 165:6, 13 220:21 240:15 249:15 251:10 Beach 2:12 bear 47:24 Bearden 72:13, 23 bedrock 28:23 Beebe 25:8, 21, 22 began 36:23, 24 37:8 38:11 48:14 58:21 164:17 beginning 33:24 56:16 58:7 69:11 87:22 241:10 257:5 behalf 8:10, 12, 14 16:12 19:5 118:7, 8 199:8 250:4 259:12 believe 13:8 14:11 19:9 21:11 22:18 31:19 32:8 35:12 36:6 37:17 38:20 39:11 44:10, 17 45:4 47:22 53:19 57:22 59:10, 25 61:2 64:19, 22, 25 66:16, 21 67:18 69:10, 24 79:13, 14 80:10 84:13 88:20 90:11 91:9 112:15 123:19 133:20 134:16, 22 142:17 152:10 156:1 158:7 161:12 164:14 168:11 169:11, 25 171:18, 21 172:18, 19 185:19 193:10 196:3, 10, 18 199:5 206:13</p>	<p>207:11 208:12, 17 212:5, 21 213:1, 5 214:22 216:23 221:13 227:6, 23, 24 231:12 232:3, 23, 25 235:9 238:24 241:6 244:9 245:14, 19 256:3 257:19 260:5 261:22 263:22 271:10 belong 16:16 100:4 Ben 135:12 benchmark 162:1 263:1 Benham 72:25 B-e-n-h-a-m 72:25 Benjamin 2:6 8:6 243:2 249:14 best 9:15 46:5 56:7 195:10 275:12 bet 229:3 better 164:10 199:25 219:5 beyond 54:24 73:12 82:23 87:15 98:11 117:22 118:14 126:18 133:15 190:11 big 254:22 255:12 Bill 4:20 6:15 34:7 35:19, 22 41:6 55:7 56:17 83:11, 18, 24 96:4, 12, 14, 18 105:9 115:13 116:7, 9 130:18 137:10, 19, 20, 23, 24 138:1, 3, 8, 10 139:19 140:11, 13, 23 141:21 142:15 146:14 154:3 157:20 158:16 160:19, 20 172:5, 13 176:9 178:25 183:16 184:5, 21 187:7, 11 196:2, 3 205:21 206:25 207:19 212:16 213:10 214:25 215:9 216:9 220:20 221:18, 21 222:10, 14 223:10 225:1, 13, 17 226:1, 21 229:10, 12, 20</p>	<p>230:4, 9, 24 231:3, 9 233:17, 25 234:1, 13 237:6, 15, 16 239:4, 15, 16 241:3, 5 243:25 245:3 246:9, 16, 19 247:3, 5, 7, 17, 19, 20 248:3, 8, 19 249:2, 4, 24 251:9, 11, 17, 22 252:6, 22, 23 256:20, 24, 25 257:7, 19, 21, 24 258:1, 4 259:16, 17, 18, 22 261:23 262:9, 11, 18, 21 263:6 264:8 265:6, 25 266:18 267:9, 16, 25 268:3 269:14, 22 270:17, 20 billed 276:13 bills 34:8, 9, 11, 14, 17, 24 41:19 90:1 96:9 137:24 138:6 140:6 155:1 161:2 171:23 184:12, 13, 15 221:14 223:4 225:6 227:14 228:4 229:17, 24 231:6 232:14 236:7 241:24 252:16 256:10 258:11, 17, 21 265:12 268:24 269:18 273:5 bill's 183:22 binders 64:8 birth 25:3 Bishop 22:2 bit 24:23 45:19 74:4 78:2 121:4 142:23 219:4 251:11 254:4 268:9 black 233:10 Blake 212:22, 25 blasted 109:22 bled 221:14 Block 75:18, 19, 20 81:15, 20, 22, 24 82:2, 3, 6 83:3, 11, 17, 20 84:2, 6 blowups 254:7 BLR 15:19 16:2, 3, 9, 23 17:1, 3 18:6 19:15, 22 32:16 33:9</p>
--	--	---	---

36:8 39:4 43:3, 19,
21 44:25 48:17 49:6,
20, 21, 24 51:3, 19
54:15 60:3 62:7, 25
64:13 69:12, 15, 22
70:8, 21, 25 87:8, 11
90:12 96:23 98:3, 16
104:21 110:3 118:4,
24 119:5 129:15
135:21 136:9, 13
144:20, 24 156:17
157:3, 16 158:20
159:4 160:10 161:10
166:23 171:16, 19
173:22 186:23
192:10 194:17
198:15 204:19
214:12 220:11 230:2,
17 240:19 245:12
246:13 256:17
260:11 261:19 271:4,
11 272:20, 24
BLR-488 235:21
BLR-Byrd-FOIA-
01626 4:19 135:2
BLR-CMA 5:5
BLR-CMA-00224
155:21
BLR-CMA-00257
4:23 160:16
BLR-CMA-00588
113:21
BLR-CMA-04156
4:18 114:6
BLR-CMA-04233
4:16 104:14 110:4
BLR-CMA-08775 4:6
89:8
BLR-CMA-181 4:20
137:11
BLR-CMA-209 5:2
172:6
BLR-CMA-217 4:20
145:13
BLR-CMA-234 4:24
165:3
BLR-CMA-243 5:5
175:13
BLR-CMA-250 5:2
174:15

BLR-CMA-275 5:9
183:16
BLR-CMA-284 5:5
176:17
BLR-CMA-291 5:9
187:2
BLR-CMA-316 195:5
BLR-CMA-328 5:12
205:5
BLR-CMA-335 5:15
207:20
BLR-CMA-342 176:8
BLR-CMA-348 5:17
210:4
BLR-CMA-360 5:18
212:10
BLR-CMA-376 5:20
214:15
BLR-CMA-400 5:24
220:21
BLR-CMA-408 5:23
216:19
BLR-CMA-418 5:21
216:1
BLR-CMA-425 5:12
198:19
BLR-CMA-439 6:2
226:21
BLR-CMA-452 6:2
230:5
BLR-CMA-475 6:5
233:17
BLR-CMA-488 6:5
235:1
BLR-CMA-518 6:9
243:8
BLR-CMA-525 6:9
244:2
BLR-CMA-533 6:15
251:10
BLR-CMA-542 6:12
245:3
BLR-CMA-549
251:18
BLR-CMA-560
251:19
BLR-issued 267:21
BLR's 63:20 68:25
Board 276:14
bodies 113:16 258:5

body 18:3 266:17
267:2
book 37:12, 13 68:9,
14, 22 160:1
born 25:1, 2
Boston 27:16 28:6
bottom 88:18 91:6
92:4, 7, 16, 19 93:1, 3,
9 121:8 122:9, 11
137:25 159:14
161:21 164:3 209:3
213:25 222:15
241:11 265:19
bound 9:14
boundaries 88:4
103:25 113:1, 15
181:5 266:24
boundary 76:2 88:8
bounds 75:15 83:13,
16 128:11 139:9
192:25
Bowen 4:15 30:4
39:13 43:5, 17 45:1
48:20 50:4 52:7
90:11 96:14, 25 97:5
104:13 105:5 139:13
142:4 161:1 166:25
171:21 184:25 185:1
195:14, 18 196:1
215:2, 23 223:14
229:15 234:7, 15
235:9 245:20 250:3,
5 252:15 253:1
Bowen's 61:8
box 168:19
brain 92:10
Brascher 2:21 4:6
8:3 73:22 270:12
272:4, 8 273:13
274:12
break 8:20 10:15, 20
136:19 141:11
216:16
breakdown 66:25
67:1 76:23 169:19
232:24
breakdowns 92:3
163:19
breaking 194:24

breaks 10:16, 17
Breanne 201:16
Brewer 22:9
bridge 179:20
Bridges 89:9
briefly 13:10 87:14
Briggs 22:11
bring 12:7 255:3
broke 61:25 66:17
broken 33:14 233:11
brought 20:17
204:24
Brown 22:13
Broyles 2:21 8:12
building 81:22
BUREAU 3:2 7:25
12:18 15:15, 16, 18,
25 16:3 18:11 19:4
33:7, 12 35:13 40:15
44:19 59:9 63:11
70:3 74:14 110:7, 10
118:7 150:15 162:23
165:13 208:7 217:17
256:6 262:5 271:16
Bureau's 153:18
Burleson 89:10
busiest 221:16 234:6
business 151:20
busy 41:19 171:25
215:6 223:17
button 34:21 65:22
buttons 46:4
Bynum 22:15

< C >
cabinets 255:14
calendar 52:20, 25
calendared 52:23
California 2:9, 12
call 193:8 203:9
204:23 205:2 267:22,
23, 24 268:7
called 27:17 37:13
41:20 42:17 245:23
calling 148:20
calls 71:3, 12 83:6
149:12 209:24
227:17 258:7 260:4,
6, 7 262:6

<p>candidate 76:17 candidates 76:25 capability 83:11 100:25 101:3, 4 112:23 capacity 1:7 2:20 11:6 21:16, 17 23:3, 15, 17 24:4 33:2, 3 272:20 273:2, 7 Capitol 1:22 3:4 capture 130:7, 17 captured 106:22 107:3 109:8 captures 110:21 care 61:19 careful 17:5 69:3 Carolyn 22:11 carried 102:24 carry 16:17, 18 95:11 107:7 carrying 93:19, 21 108:13 179:9 CASE 1:5 8:5 11:6, 8, 16 12:16, 17 13:4, 11 14:13, 14, 21 20:5 21:4 23:21 24:25 37:11, 12 59:20 60:13, 24 61:3 65:10 68:13 86:23 127:14 128:15 129:25 131:20 132:9 134:2, 16 140:1 142:21 150:17 158:18 165:19 211:14 213:3 238:24 244:23 247:14 254:9, 18 263:19 271:4 cases 37:12, 21 60:7, 16 68:18 126:6 cat 95:23 catch 236:18 categories 120:8 121:18 169:6, 8, 10 category 117:4 119:20 cause 1:19 caveat 154:22 253:7 CCR 1:20 276:20 CD2 66:23, 25 67:2</p>	<p>cell 70:19, 21, 24 71:5 75:17 census 36:21 43:25 44:2, 14, 16, 19, 20 45:9, 21 48:4, 7, 12, 17 54:10 58:18 65:24 71:15 75:6, 10, 12, 21 76:5, 8, 10 77:3 79:9, 18 81:12, 19, 22 83:12 84:10 85:1, 11 106:13, 16 108:6, 7 122:16, 23 123:2, 22 124:1, 12 127:20 143:20 147:2 152:12, 20 178:24 203:25 218:18, 21 Center 2:8, 12, 22 91:13 Central 28:8 certain 27:15 29:1 78:19 81:23 97:23 123:9 126:1 139:6 142:24 155:3 164:21 184:19 203:17 certainly 118:8 151:14 220:5 Certificate 276:20 certificates 30:15 Certification 4:6 275:1 Certified 275:2 276:2 certify 275:3 278:1 chain 89:10, 16 135:5 chair 255:22 chairperson 268:19, 21 chairpersons 268:25 chairs 57:19 challenge 20:20 22:24 challenging 13:18 21:8 change 35:3 92:16, 24 96:5, 7 112:24 122:4, 5 203:10 211:5, 12 212:2 222:20 228:21 247:19 274:4 277:1</p>	<p>changed 91:21 92:22 93:8 203:9, 13 257:14 266:14 changes 88:2, 8 90:9, 21 91:1, 25 95:7, 20 122:11 154:20 155:24 156:8 161:23 246:22, 24 247:7 259:14 266:16 274:5 275:14 278:1 changing 35:10, 18 122:8 161:23 192:3 characteristics 28:21 characterization 18:8 characterize 18:9 247:13 248:13 characterized 66:5 charge 268:22 charged 268:14, 18 chart 115:10 169:6 check 31:18 73:18 102:12 103:15 264:9 checking 235:15 257:2 271:23 checks 100:25 101:5 102:16, 18 182:1 chief 15:6 18:5, 10 23:19 259:15 choice 93:12 148:11 157:11 choices 63:19, 20 174:7 260:25 265:23 choose 69:7 chooses 40:14 choosing 133:4 174:5 chose 27:3 217:14 254:22 CHRISTIAN 1:3 21:15 22:5 circle 158:25 circuits 68:19 134:12 circumstance 94:6 cities 181:15 City 37:16 113:18 Citygate 39:10, 16, 21 40:5 46:10, 15, 24 73:13 74:17 Civil 1:24 275:16 claim 145:20 151:6, 9, 18 152:2 201:12</p>	<p>claims 20:17, 22 23:6 24:1, 8, 11 82:20 clarified 238:23 clarify 23:16 24:3 61:5 70:11 71:17 93:6 106:3 121:21 191:6 232:12 272:24 clarity 89:24 184:10 Clark 175:1, 4, 12, 18, 24 class 29:15 classes 29:16, 25 47:20, 22 clay 29:1 clean 90:24 97:19 clear 9:11 10:24 19:15 56:7 58:2 60:6 84:10 105:4 111:19 120:6 121:6 139:11 145:6 151:14 183:25 190:24 206:21 220:21 228:6 231:5 241:20 258:10 273:23 clearly 9:9 158:17 clicking 46:4 clients 17:17 climatology 26:16 closely 36:13 cloth 35:7 CMA 7:9 CMA-220 164:2 CMA-234 165:21 code 35:1, 2, 3, 9, 10 90:2, 6 132:18, 22 257:1, 7 codified 36:2 cohesive 87:24 collapse 258:18 colleague 8:2 collect 136:10 collected 61:17 63:3 collecting 59:19 60:23 collection 61:22 62:2 collections 61:14, 23 college 25:18, 19 47:17 colloquially 108:3</p>
--	--	---	--

<p>color 60:19 87:25 90:16 240:12, 25 color-coded 88:21 colors 46:7 87:22 105:14 122:2 column 115:11, 14 158:8 come 29:24 53:2 65:2 94:21 105:4, 7 106:16 113:25 154:2 157:2 161:1 165:16 184:21 211:16 215:7 220:1 252:21 253:14 270:8 comes 19:6 27:21 133:4 149:9 151:10 comfortable 177:5 comfortably 161:1 coming 17:17 34:1 37:1 45:2 86:12 99:16 128:7 147:3 177:5 commenting 32:11, 15 comments 38:25 commission 24:7, 10, 14 committee 33:13, 14, 19 36:13 40:9, 11, 18, 21 41:7, 8, 10, 21 42:7 56:14 57:18, 21 58:6 62:13, 15 63:8, 13, 15, 16, 18 64:2 127:1 129:4 133:19 135:23, 24 136:14, 15 137:17, 18 157:1 170:13 171:5 177:7 184:11, 14 217:14 227:2 246:5 254:8 268:20, 22 269:21 Committees 38:17 40:13, 18, 25 41:13 134:14 254:7 268:14 269:1 common 190:17 211:25 communicate 71:24 communicated 148:24 149:17 191:21 201:3</p>	<p>communicating 234:14 260:2 communication 83:7 85:22 109:24 193:4 217:10 219:2 227:20 258:7 259:8 270:24 communications 94:2 101:17 125:22 166:8 224:1, 3, 4, 5 246:4, 7 269:23 270:2 272:12, 18 communities 27:7 127:13, 18 128:9 129:16 130:5 136:9 182:16, 19 183:4, 5 Community 44:18 45:10 127:21, 24 128:6, 14 130:8 compact 102:22 103:21 158:1 compactness 101:6, 9, 13, 24 102:7, 13, 16 157:19, 21 182:4 company 74:25 276:9 compare 67:16 112:16 compared 64:24 219:21 242:10, 11, 12 comparing 182:7 compilation 78:13 compiled 129:15 complaint 20:21 21:1 complaints 20:1 completely 10:22 35:6 55:7 268:17 completion 56:16 compliance 276:14 compositions 100:9 compounded 81:21 computer 27:2, 5 34:18 46:4 51:21 52:7 71:9 77:6 80:14 88:4 90:15 93:5, 14 94:22 95:15 97:4 111:23 140:18 141:18 146:19, 21, 25 147:4 153:18 162:20, 23, 24 167:7 172:23 173:3 174:23 175:22</p>	<p>177:12 185:8, 14 191:4, 15 194:1 199:22 205:18 215:12 223:12 229:22 233:14 253:6 254:11, 13, 15, 21 255:14 256:6, 7 261:19, 20 265:14, 17 267:21 computers 54:1 255:1, 6 256:2 conceded 118:21 concern 152:10 concerned 243:2 concerning 54:18 concerns 93:18, 21 94:7 228:15 267:5 conclusion 63:17 concurrent 236:7 258:11 condemnation 23:21 conducted 36:22 69:15 conference 85:17 159:23 160:1 confidential 17:22, 25 18:25 55:3, 7 confidentiality 54:19, 23 config 114:18 configuration 115:4 207:1 249:6 confirm 212:24 confirmed 213:8 confused 141:10 144:3, 4 confusing 184:1 congress 79:11, 19 138:14 congressional 11:19, 23 12:3 13:5, 19 14:21 20:7, 20, 23 21:8, 23 22:24, 25 23:7 24:17 32:12 33:5, 21 34:4, 17, 25 35:23 36:5 40:25 41:13, 24 42:5, 13, 24 43:4, 19, 22 44:15 47:12 48:2, 12, 16 49:2, 7, 13 50:11, 16,</p>	<p>20 51:17 53:23 54:2, 10, 13, 16 55:9 56:12 57:14 58:12, 22 59:3 60:11 62:8 63:1 64:10, 13, 24, 25 66:4, 10 67:10, 11 69:1, 15 70:6, 9, 12, 16 71:1, 4, 14, 16, 25 72:4, 8, 11, 16, 17 73:2, 3, 6, 8, 12, 16 74:6, 9, 22 75:3 77:10, 13 78:23, 24 79:12 80:4, 12, 16, 18, 22 81:4, 8 82:4, 7 84:12, 16 87:15, 18, 21 88:21 89:11, 17, 21, 25 90:14 91:8, 14, 19, 22 92:18 93:23 97:17 99:1, 8 101:14, 25 104:22 105:5, 8, 12, 21 106:9, 17 107:6, 16 108:5, 9, 14 110:17, 19 111:10, 16, 20 113:12, 17 120:22 121:5, 16, 19, 23 122:18, 22 124:11, 18, 24 125:11 127:7, 16 128:19, 21 129:9, 17 131:23 132:5, 21 135:22, 23 136:12 137:6, 24 139:14, 23 142:25 144:17 146:6 155:11, 24 156:9, 18 160:3 172:17 194:18 201:21 205:13, 15 218:23 219:18 223:21 227:3 233:24 234:4 235:8 237:1, 17 240:21, 25 250:14 265:9, 10, 15 266:3, 14 268:15 269:18 270:24 271:2 connected 254:15 connection 188:25 consider 27:7 28:9, 13 29:2 36:7 40:23 46:18 47:14 62:11, 12 84:7 101:13, 24 136:1 189:22 262:12 consideration 198:6 266:23</p>
--	---	---	---

<p>considerations 102:10 129:23 132:19 considered 28:1, 4 40:24 43:18 96:22 97:15 98:5 102:6 133:3 134:4 137:5 139:19, 23 considering 67:25 98:15 consistent 135:17 186:19 190:8 262:24 264:5 consistently 30:8 constantly 221:20 constitution 132:2 133:7 constitutional 47:21 124:21 construction 266:22 consult 42:23 consultants 73:11 consultation 49:17, 18, 19, 21 consulted 11:22 12:1 contact 12:24 40:5 47:6 195:24 267:6, 8, 15 269:5, 13, 17 270:2 contacted 12:15, 19 163:3 contacts 262:4 269:20 contain 275:9 contained 75:11 78:12 122:19 175:8 275:8 contemporaneous 262:3 content 11:14 108:23 contents 250:8 270:3 contest 10:14 context 59:8, 18 contiguity 67:6 182:1 contiguous 67:13 100:20 101:2 102:7 103:16 158:5, 6 continued 3:1 5:1 6:1</p>	<p>continuing 228:4 continuity 64:22 contours 118:12 133:14 145:19 151:7 154:7 171:9 192:24 267:11 270:4 contract 254:10 276:5 contractual 74:19 contributed 141:1 control 275:25 conversation 19:23 193:15 260:10 conversations 163:1 206:4, 6 convey 38:3 51:11 56:11 conveyed 107:14 conveying 38:9 114:24 coordinates 249:6 coordination 107:6 108:13 copied 135:7 271:10 copies 80:5 261:19 276:1 copy 13:4 14:25 35:1 60:10 61:10 89:18 94:21 97:8, 20 120:12 211:10 240:12 247:17 248:11 255:2 256:4 261:3, 20, 21, 22, 25 267:18, 21 cores 129:19 corner 168:18 240:17, 20 241:11 242:6 252:3 256:24 correct 15:6 16:25 17:2 18:4 23:1 25:25 26:2 27:13 30:2 34:16, 20 35:24 40:10 44:23 46:25 48:5 49:4 52:13, 16 55:10, 20 58:6, 11, 25 60:5 62:16, 20, 22 65:13, 19 70:10 74:10 76:20 79:1, 6 80:19 81:17 84:5 86:10 88:6 90:5</p>	<p>92:22 93:15 94:9, 15 95:5 97:2 103:22 104:7 105:6, 10, 15, 22 106:14, 19 116:12 119:9 121:12, 20 122:14 123:23 130:3 131:4, 14 132:16 135:20 138:22 139:17, 21, 25 140:4, 10 146:20 149:25 153:11 161:24 164:6, 12 165:1 167:8 169:17 170:20 173:16, 17 174:24 175:3, 23 176:2, 24 180:4 184:16 185:9, 16 189:7, 8 193:21 198:1, 5, 10 199:1, 10 203:6, 21 204:13 205:3, 10, 19 207:4 208:1, 4 209:8 214:2 215:13, 19 217:1, 4 218:8 219:22 221:6 222:5 223:13 225:20 227:11 228:13, 20 229:25 234:2 235:24 237:12 238:3 239:2, 6, 10, 14, 25 240:4, 8 242:4 243:6 244:21 246:21, 25 250:15 252:4 253:7 255:19 256:21, 22 257:7 259:20 262:10 275:10 278:1 corrections 278:1 correctly 45:3, 4 46:7 54:4, 6 177:21 correspond 83:13, 17 123:12 184:13 correspondence 135:15 140:15 corresponding 234:11 cosponsor 247:20 248:12 Council 72:7 counsel 7:8 10:4, 25 23:19, 20 59:19 147:25 275:17 276:12 counsel's 147:19</p>	<p>counties 25:16 26:3 35:17 66:24 67:1 81:3 96:16 97:23 99:8, 15, 20 103:25 104:2, 5 116:10 130:21, 23 142:24 147:23 148:2 152:25 154:24 155:3 158:9, 14, 15 189:20 200:18 202:13 203:8, 11 204:6 215:15 235:15 261:23 country 29:13 county 25:5, 6, 9, 18, 21, 22, 24 26:1 32:4 66:18 77:25 88:19, 24 91:12, 19 92:3, 15 93:8 122:7 127:9 130:19 153:3, 5 158:17 181:11, 13 189:24 192:2 200:3 202:9, 17 203:16 204:4, 10 218:4 219:6, 7, 11, 13, 17 229:3 264:1, 2, 14 couple 252:17 272:4 course 14:24 29:10, 18, 22 177:2 190:12 234:9 253:24 254:17 270:15 courses 29:15 COURT 1:1 9:6 10:2, 6 24:21 151:21 194:22 274:15 275:2 276:14 courtroom 9:3 covered 148:6 CRC 1:21 276:20 create 62:6, 10 64:8 152:23 203:7 248:22 249:5 264:22 created 35:13 38:24 59:3 63:2 96:7 108:1 111:22 143:16 156:25 163:23 222:18 248:17, 21, 24 creating 62:24 64:12 68:22 147:18 criteria 97:25 98:4, 9, 18 102:7 124:19</p>
---	--	--	--

126:5 129:24 131:6,
 8 132:1, 20 133:4
 134:5, 11 135:14, 19
 157:18 174:9 265:22
crop 128:20 129:9
cross 179:20
cross-checking 235:15
Crowley's 27:18
CRR 1:21 276:20
cubicle 52:1
cultural 128:1
current 14:20 15:1
 81:21 83:14
currently 25:10
 134:3, 8
Cusick 2:3 8:9
cycle 21:25 33:5, 10
 36:20, 22 42:14
 43:22 47:13 48:3
 59:4 74:9 107:16
 127:8 133:10 138:15
 139:24 146:7
cycles 33:20

< D >
daily 145:24
Dana 1:20 275:2
 276:20
data 16:22 36:21
 37:3 43:25 44:3, 13,
 16 45:3, 8, 9, 10, 14
 58:16, 18, 19, 20
 64:25 65:23, 24
 66:17 68:2 74:5
 75:2, 5, 6, 10, 12, 19,
 20, 22 76:6, 8, 9, 10,
 12 77:1, 2, 4, 7, 9, 12
 78:4, 12 79:9, 18, 19
 80:15, 18, 20, 24, 25
 81:6, 11, 16, 19, 20, 23,
 24 82:2, 3, 7 83:2, 12,
 17, 20 84:2, 7, 11, 14,
 20, 24 85:1, 4, 11
 93:1, 16 106:6, 8, 9,
 10, 18 108:7 112:20,
 21, 24 116:24 117:18
 118:20, 24 119:24
 120:2, 5, 10, 20, 25
 121:1, 3, 4, 8, 15
 127:17, 20 143:12, 17,

22, 25 144:9, 10, 16,
 19, 21, 25 146:23
 147:2, 5, 6 152:6, 11,
 12, 14, 20, 23 153:20,
 23 157:10 158:11, 20
 161:17, 22 163:9, 13,
 17 164:6, 9, 21 167:9
 169:14, 21 170:5, 7
 171:13, 14, 17 172:21
 173:13, 19 178:10, 19,
 21, 24 179:2, 8, 18
 180:1, 5, 6, 9, 18, 19,
 24 181:3, 10, 21
 185:12, 24, 25 186:1,
 9 188:2, 5, 7, 10, 14,
 20, 25 189:2, 6, 10, 14,
 17, 22 190:3, 19, 20
 191:9, 11, 13, 14
 192:1, 4, 5, 6 194:5, 6
 197:18 198:2, 3
 199:12, 19 200:2, 14,
 15, 21 201:21 202:12
 204:2, 9 207:5, 14
 212:3 214:8 218:19,
 22 231:8, 23 232:18,
 21 236:3, 9 237:10,
 15, 23 238:6, 10, 12,
 13, 20 239:3, 13, 17,
 24 240:1, 2, 6 242:17
 243:20, 21 248:8, 17,
 22 249:1, 7
dataset 153:21
datasets 44:22
date 38:19, 21 178:1
 214:1 235:20 278:1
dated 104:13 113:23
 114:7 271:5
DAVENPORT 1:12,
 16 4:6, 15, 18 7:2, 6,
 14, 17 31:25 42:20
 104:13 113:23 114:7
 139:4 148:24 149:17
 152:5 184:6 189:3, 6
 194:23 201:7 263:21
 264:18 266:10
 270:15 273:16 275:6
D-a-v-e-n-p-o-r-t 7:15
Dave's 85:6, 12, 15,
 25 86:3, 11, 15 87:9
 183:10 262:12, 19

Davis 187:8, 23
 188:11 189:10, 15
 191:2 193:8, 16, 20
 198:25 199:4, 6, 7
 201:16 204:25
Davis's 187:11
day 1:19 10:17
 57:10 178:3 183:23
 184:2 229:6 270:15
days 13:14 56:16
 177:24 178:4
day's 229:5
DC 2:16
deadline 56:24 57:1
dealing 55:9
dealt 13:5 14:21
 90:2
December 33:25
decided 26:21, 22
 34:5 65:15 68:19
decision 57:18 74:11
 83:2 93:10 102:9
 127:11 266:19
decisions 16:12
 45:15 69:4 93:4, 7
 127:15 141:24 204:3,
 6 226:9
decrease 123:5
decreased 124:8
decreasing 123:18
dedicated 17:12
 51:21 53:1
deep 75:21
default 167:17
DEFENDANT 1:9
 2:18 23:23
defendants 8:5
Defense 2:4, 15
define 127:21
defined 182:17, 18
defines 128:13
definitely 134:8
 141:12 235:11
 250:24
definition 83:17
 127:24
degree 26:19, 20
 30:1, 6
delayed 37:3

deleted 35:5 155:16
deliberating 58:22
Delta 27:19, 20, 25
 28:1, 2, 9, 13, 18 29:2
 128:13
Democrat 272:22
 273:8
demographic 64:25
 66:14, 17, 22 93:1
 116:24 117:18
 119:11, 12, 14, 24
 120:2, 5 144:21, 25
 163:9, 13, 15, 16, 17
 164:9, 21 169:1, 14,
 19, 20, 25 173:19
 178:10 186:4 196:15,
 23 216:12 218:19, 22
 224:19, 22, 25 225:10,
 13 226:5 230:23
 231:8, 23 232:13, 18
 234:22 237:10, 15, 23
 238:6 239:13, 24
 241:23 242:7, 16
 243:20, 21 246:9
 248:22 251:3, 4
demographics 64:20
 67:24 68:1 116:14,
 18 118:1 168:19
 224:15 225:22
dendrochronology
 26:15
Department 15:2, 8,
 9 23:20 32:22 35:12
departure 126:13
depend 28:21 51:5
depended 42:1 51:14
Depending 265:6
 272:21
depends 51:2 60:17
 64:17
DEPONENT 278:1
deposed 12:16 22:23
 23:2, 9, 10 24:16
DEPOSITION 1:11,
 16 8:23 9:7 10:2
 12:8, 14, 20, 22 13:2,
 4, 8, 11, 16, 17 14:3,
 17 19:18, 21, 25 20:4,
 6, 10 23:13 151:4

<p>274:2, 3 275:15 276:1 depositions 151:20 deposits 28:3 29:2, 6 derive 65:21 derived 242:3 describe 34:22 78:14 147:25 169:24 238:13 described 83:25 123:24 144:10, 16 147:6 204:10 248:7 describing 113:3 143:24 203:23 DESCRIPTION 4:6 83:13 design 20:23 125:11 140:22 150:5 162:9 175:25 182:7 185:18, 22 215:16 designate 97:22 designated 40:12 55:4 87:23 designating 222:17 designation 222:21 223:10 257:23 designations 88:20 218:4 designed 67:4 142:6, 9, 15 149:5 150:8 151:17 designing 198:7 desire 125:5 131:9 desires 108:14 130:23 desk 202:23 desktop 51:21 52:12 53:25 54:6 detail 81:13 detailed 217:6, 16 details 35:15 determinations 101:22 108:11 determine 103:11 152:1 158:1 181:11 determined 74:14, 15 81:20 determining 61:20 develop 74:9 82:4, 7 85:13 86:4 105:5, 8</p>	<p>106:17 130:9 136:11 137:20 138:2 141:25 143:12 152:16 161:14 167:10, 19 179:7 180:7, 10, 19 183:11 188:15 190:4 191:15 198:4 208:19, 21, 25 211:8 263:7 developed 29:13 79:7 156:9, 21 162:2 207:2 208:22 209:5 262:25 developing 87:15, 18 97:24 98:1, 3 104:25 107:5 110:17 112:17 113:11, 16 121:5 127:7 131:23 144:12 161:11, 18 180:25 181:5, 7, 23 182:2, 5, 8, 11, 20 183:5 186:2, 5 189:15 194:17 199:13 204:25 207:17 209:2 218:23 223:21 224:14, 22 226:9 247:12 270:24 development 128:20 140:2 152:6 153:16 154:1, 13 155:10 163:2 176:5 177:18 178:11 186:9 189:11 196:13 199:20 200:21 201:20 205:16, 21 206:21 208:16 210:17, 19, 23 211:2, 6 214:6 215:23 216:13 220:11 223:2, 21 260:15 265:24 266:3 deviation 125:11 126:24 159:2, 3, 6, 15, 18 160:2 164:3 diagonal 27:15, 21 difference 219:14 254:1 differences 124:6 222:1 different 13:4 29:9, 20, 24 36:9 48:21 53:7 72:19 76:5, 14 78:14 95:23 105:14</p>	<p>113:8 116:22 120:2, 4, 15 121:15 126:5 146:10 151:23 207:1 216:8 221:25 222:14, 17 231:24 232:1 235:18 236:7 239:13 241:10, 18 248:13 250:12 258:5 269:23 272:21 273:7 difficult 121:24 146:8, 11 difficulty 114:25 167:14, 16 257:12, 13 dilution 131:17 132:13, 25 direct 18:13 36:10 88:1 111:17 114:14 115:15 125:1 155:19 229:18 directed 18:14 167:18 191:9 225:9 228:18 265:3, 4 directing 130:7 203:7 direction 19:1 50:6 119:16 228:11 234:19 259:11, 19 264:25 275:13 directions 111:8 203:19 directly 29:23 41:3 51:13 96:7 270:20 276:13 director 15:8 36:11 39:4 61:19 115:5 directs 18:19 132:23 disagree 274:9 disclose 18:2 19:1 193:4 270:1 272:11 discoverability 201:10 discoverable 109:25 discretion 273:10 discrimination 20:23 23:6 24:2, 9, 11 discuss 12:13 14:17 19:18, 21 43:12 132:9 198:14 209:15 discussed 43:10 159:22 169:4 208:8 226:6 227:13 228:19</p>	<p>discussing 118:19 145:2 170:9 173:21 209:9 224:10 230:1 discussion 74:5 129:4 159:25 170:23 discussions 11:15 209:18 230:18 disputes 273:24 distance 101:11 distinction 133:23 219:20 254:1 distribution 124:3 203:8 DISTRICT 1:1, 2 66:7 67:8, 9, 10, 12 87:23 88:21 91:14, 20, 22 92:18 96:17 97:23 99:7, 20 100:4, 17 101:9 105:25 106:1, 2 108:5 118:1 121:23 123:10, 18, 19, 25 124:5 127:8 142:25 153:3, 6 155:24 156:8 159:13 163:19 164:3 168:18 181:11 189:24 200:4, 18, 19 202:10, 13, 18 203:17 204:11 218:7 219:18 232:25 233:4, 10 242:13 244:14, 15, 16, 17, 18 264:16 265:9, 16 districtr.org 87:6, 12 districts 64:24 66:4, 11 78:23 81:4 87:21 91:8 100:10, 12, 19 101:1, 2 102:22 103:16, 21 105:14 106:9 113:11 122:18, 22 123:1, 6, 7, 9, 12, 18, 21 124:11, 18 125:12, 18 126:14 129:20 132:5, 21 148:2 152:25 158:6 159:3, 17, 20 160:7 181:6, 16, 23 192:3, 8 202:14 216:25 219:7 241:1, 11 244:20, 24 250:9 265:10, 16</p>
---	--	---	---

dive 24:24 136:19
Divide 182:21
divided 40:15 43:9
dividing 27:14, 18 66:9
division 19:8 43:5 52:2, 11 254:16, 18
divisions 158:9
divulging 202:4
doc 253:16
document 13:6 37:15 63:7 107:25 114:5 115:20 135:2 138:12 143:16, 21 152:24 155:23, 25 156:5, 16 157:16 160:5 165:15 168:6 176:8 201:11 250:10 264:8
documentation 53:12
documented 133:6 141:16
documents 12:10 14:13 39:12, 15, 24, 25 42:12 59:2, 19 60:23 61:3, 16, 20 89:14, 20 133:19 137:14 138:10 172:9 251:8, 16 256:11 257:23 261:15
doing 35:20, 21 45:3 46:9 61:10, 14 73:18 108:22 111:2 129:3 151:15 182:4 187:15 194:21 218:12 228:3 229:24 235:12 259:10, 12, 18
door 52:2
DOS-based 27:4
Dot 177:9
dots 158:25
Dotson 176:23 177:3 178:7, 20 179:5, 7, 13 180:7, 10, 19, 25 181:4, 15 182:17 220:10 241:4, 5, 8 244:4, 10, 25
double 26:9
double-check 264:7

double-checked 261:23
draft 34:24 35:16 82:13 83:24 86:20 96:14, 18 104:10 107:18 108:10, 24 111:2, 16 130:18 148:13 158:16 178:5 215:9, 10 228:4 240:21 243:17 252:22 258:1 260:3
drafted 50:22 52:7 83:14 96:12, 13 139:1, 2 146:1, 22 149:18 155:1 156:12 199:5 213:5 222:10 223:14 230:10 233:21 235:11 241:7 244:10 250:3 253:8, 24
drafter 19:13 55:7 137:23 138:1 146:14 184:21 250:2
drafting 16:5, 14 17:5 19:7, 16 27:2 33:12, 15, 22 34:2, 3, 6, 7, 17 35:6 36:15, 17, 23 40:8, 16 41:19 47:22 52:8 55:19 72:18 90:7 91:3 145:24 156:11 171:23 177:6 178:25 179:1 193:9 198:23 199:7 202:10 216:9 228:25 229:17, 19 233:20 234:10 235:14 252:23 270:17 271:15
drafts 83:11 256:13, 15 257:21, 24
dramatic 123:3
draw 44:2 45:8 48:16 49:12 50:11 74:22 75:9 84:3 85:10 96:25 190:14, 21
drawer 43:8
drawing 43:11 44:12 45:20 46:19 48:11, 15 49:1 50:14, 16, 19

51:17 53:23 54:2, 9, 16 58:12 64:10 67:17 71:19 74:6 77:9, 13 80:3, 16, 17 83:21 84:7, 11, 16 90:13 101:1, 13, 23, 25 105:21 107:15 128:19 129:10, 17 135:22 138:14 141:22 143:25 155:11 189:1 190:9 234:12 235:13 252:13 273:4
drawn 43:18 49:15, 16 67:14 68:1 96:10, 19, 22, 23, 24 104:3 108:2 112:19, 21 125:8 160:7 221:4 252:20 273:11
drew 43:21 44:21 48:1 49:9 50:24 51:1 55:13 96:11 138:7 139:1, 2 155:1, 2
drill 142:23
Drive 2:12 254:20 255:2, 23, 25 256:3, 9, 14, 18
drop-in 52:23 53:10
duly 1:17 7:3 275:6
duty 9:1

< E >
earlier 14:13 81:15 84:1 112:15 114:2 118:2, 18 139:12 140:17 144:10, 16 147:6 168:25 169:4, 5 170:17 180:3 217:5 230:20, 22 237:21 238:22 239:3 244:22 248:7 250:11 262:24 263:7 269:18 270:8, 23
Early 16:1 27:1 38:20 166:20
easier 97:21
EASTERN 1:2

Ebenjamin@omm.com 2:10
economies 29:8
EDGE 44:9, 10 241:12
edit 214:1
edited 235:20, 21
educating 271:14
education 190:20 271:15
Educational 2:4, 15 19:9
effectuate 147:12 246:20 264:22
effectuating 260:25 264:16
efforts 162:19
either 16:15 23:15 41:12 46:23 60:13 65:16 71:11 106:16 139:14 140:16, 24 141:25 144:14 185:14 203:1 204:25 239:19 259:11 265:4
EJ 2:6 8:6
EJ's 145:15
elected 69:25
election 36:14 47:19 76:17, 23, 25 81:21 188:20
electoral 120:25 188:14 192:6
electoral-related 190:3
electronic 60:9
Elliott 207:25 208:2, 5, 10 209:7, 10, 20 210:1
email 4:6, 17 43:13 51:13 55:25 70:12, 13, 16 78:18 89:9 104:12, 18, 21 105:1, 3 106:4, 5 107:13, 22 108:24 109:7, 10, 15, 18, 21 110:2, 9, 11 113:21 114:6, 13, 15, 24 115:11 120:12 135:9, 13 143:7 154:24 162:21, 22

<p>163:4 167:6 175:22 185:8, 15 188:1 191:5 194:1 196:8 197:17 199:23 202:25 203:7 208:13, 14 211:1, 4, 10, 11, 12, 15 212:1 213:21, 24 215:12 232:4, 5, 7 233:14 238:10 254:19 260:2 271:6, 10 emailed 199:21 246:2 emails 13:9 14:12 89:15 155:8, 15 172:23 173:3 174:23 177:17, 19 196:11 205:18 229:22 Embarcadero 2:8 embarked 105:21 embedded 78:5 employed 15:12, 13, 14 59:9 275:18, 20 employee 275:20 employer 14:20 15:1 employment 24:11 enable 73:11 enabling 151:25 enacted 20:24 57:21 89:21 90:2 132:3 182:8 225:7 237:16 238:2, 7 263:8 264:14, 16 266:3, 14, 15, 22 enactment 57:15 encompassed 75:8, 20 232:21 encompasses 40:17 encounter 57:4 ended 143:16 254:24 endurance 10:14 engage 16:15 18:21 38:2 73:11 81:8 engaged 47:12 engagement 11:10 engaging 69:1 engineer 15:6 English 235:7, 8 236:6 237:15, 20, 24 238:6, 25 239:9, 15 240:5 248:20 256:21</p>	<p>259:19, 22 265:4 266:8 English's 241:24 ensure 17:3 46:6 90:5 102:21 106:21 107:3 108:1 109:8 148:12 235:16 ensuring 269:21 entail 26:24 66:15 entailed 67:3 entire 82:18 entities 113:10 entitled 155:23 193:1 entity 28:4 environment 26:17 environmental 27:23 128:5 equal 124:16 125:18 equally 17:11, 12, 21 Errata 278:1 error 47:4 esotallaro 271:13 esotallaro@gmail.com 271:6 especially 23:19 27:24 established 40:19 132:2, 22 240:16 268:25 establishes 124:23 establishing 125:14 et 1:3 7:9, 10 E-Transcript 274:13 evenly 66:10 event 274:3 everybody 194:21 everybody's 15:5 exact 89:22 109:15, 17 116:6 119:25 238:17 249:6 exactly 63:23 66:16 90:5, 8 118:16 121:10 134:19 140:4 221:25 227:24 239:17 252:25 257:25 265:21 268:16 Examination 4:6 7:4 272:7 Examiners 276:15</p>	<p>example 18:5 46:24 64:9, 18 66:23 67:23 76:16, 22 89:5 91:11, 13, 18 92:14, 16 93:19 99:19 128:12, 14 143:13 147:22 153:6 164:2 195:17 201:6 216:24 219:5 228:15, 16 242:6 examples 78:14 exception 98:14 164:14 Exchange 72:7 113:22 114:15 135:13 exclusive 248:1 excuse 15:6 27:19 81:4 112:20 128:11 133:18 208:7 242:23 exemplars 247:25 248:1 exercise 273:10 Exhibit 4:6, 17, 19, 20, 23, 24 5:2, 5, 9, 12, 15, 18, 21, 24 6:2, 5, 8, 9, 12, 15, 17 64:2 89:7, 13 104:12, 16 107:23 113:21 114:4, 5, 10 120:11 123:14 135:1, 3 137:9, 13 145:12, 14 155:18, 20 160:15, 17 163:24 165:2, 9, 12 169:8 172:4, 8 173:13 174:13, 17 175:11, 15 176:7, 10, 16, 19 183:15, 18 186:25 187:4 194:20 198:17, 20 205:4, 6 207:18, 22 210:3, 7 212:9, 13 214:14, 16 215:25 216:2, 18, 20 220:19, 24 226:20, 23 229:7 230:4, 7 233:16, 18 234:25 235:3 240:9, 13 242:22 243:5, 7, 9, 24 244:3 245:2, 5 249:13, 19 251:7, 8, 15 263:13, 14, 17, 18</p>	<p>EXHIBITS 4:6 5:1 6:1 13:7 63:15 137:17 184:14 existence 35:1 existing 90:5 96:4 129:20 exists 201:11 expect 228:24 experience 47:14, 17 132:10 experiences 128:13 expert 153:23 expertise 46:19, 20 explain 33:8 54:22 78:2, 7 150:3 173:25 209:6 explained 180:3 265:23 266:22 explaining 95:4 explains 174:9 explanation 148:17 explicit 19:1 explicitly 198:23 explore 118:12 151:4 267:11 268:10 exploring 133:13 145:19 154:7 192:24 270:3 exposed 29:12, 19 46:23 express 228:11 259:11, 14 expression 164:10 extend 28:25 extent 83:6 109:21 128:25 129:5 166:11 189:19 193:6 217:8 227:17, 20 258:6 < F > face 165:15 Facebook 31:7, 13, 21 32:25 fact 18:6 188:21 factors 27:14 101:23 fact-specific 126:7 factual 126:16 157:10 179:18 fair 16:17, 19 18:8 22:25 23:5 34:15</p>
---	---	---	--

35:20 36:19 40:24
48:1 49:1 60:8
62:21 65:12 74:16
76:18 77:1 78:21
79:2, 5 86:6, 13 88:5,
9, 10, 11 91:15, 16
94:18, 19, 20 96:9, 24
97:3 99:6 100:2, 8,
16, 20 103:12, 13, 16
105:3, 12, 23 106:2
107:5, 14 108:7, 8, 12
110:1, 15, 22 111:6,
11 112:17 118:4
121:11 130:4, 24
131:9 135:12 139:16,
20, 24 140:19, 20
141:2 142:2, 3, 7, 16,
17 143:2 144:12
145:8, 9, 11 147:14,
20, 21 148:3, 4
153:18, 20 154:3, 15,
21 162:20, 21 170:17
172:24, 25 173:6
197:25 218:5 219:8,
9 225:8 228:14
237:3, 4 244:5, 6, 14
247:12 248:4, 12
250:9 252:5 257:1
261:1 270:18, 19
fairly 27:13
fall 33:22 218:7
falls 150:20
familiar 21:18 72:14
77:3 127:12 128:3
129:19 131:17 132:6
133:25 136:8 154:14
168:9 184:8 221:12
229:16 230:12
240:22 249:20 271:8
familiarity 135:8, 18
241:15
familiarized 45:20
familiarizing 37:8
family 20:14
far 62:1 66:6, 18
74:17 88:25 89:21
115:14 124:15 125:5,
7 127:4 131:8
farmers 128:20

129:9
fashion 202:2
fast 56:24 178:1
180:13 271:24
Fayetteville 25:20
26:7 276:22
feature 27:17 67:15
102:19 103:18 122:5
158:4
features 113:8
Federal 1:23 127:4
132:18, 24 133:2, 9,
21, 24 275:16
feed 2:11
feedback 62:18
feel 171:22 195:23
fees 276:13
field 27:4
fields 80:20, 25
Fifth 2:4
fight 151:21
figure 46:5
figured 61:25
figures 103:10
196:16 200:16
246:10
file 44:19 53:19
114:18 143:18 147:8
153:22 202:24
255:14
filed 20:2 23:21
34:12 56:20 59:11,
13 161:2 226:2
247:17 258:10, 12, 15,
17
files 60:4 61:10
97:5 143:11 155:9
167:6 185:7, 14
207:15 254:19 261:2,
3, 20, 25 267:18
filing 56:17
final 34:8, 9 134:25
140:17 143:16
232:14 236:9, 12
239:22 250:4 266:20
finalize 57:14
finally 225:6 231:3
financially 275:22
find 272:1, 2

fine 108:25 111:13
162:16
finger 101:10
finish 10:19 12:5
215:4, 7 246:23
252:21 259:25
finished 26:20
252:23
Firm 11:13
first 7:3 12:15
32:22 114:14 150:19
157:19 158:25
164:15 179:20
227:25 246:2 250:6
251:9 252:13 270:21
fiscal 16:6 18:12, 13
five 165:5
flipped 13:8
Floor 2:4, 8 42:6
228:19
Flowers 195:9, 12, 13,
16, 21 196:1, 24
197:8 198:7, 9
243:11, 21
focus 33:5
focused 27:9, 22
168:18
FOIA 61:17, 21 62:3,
5 63:4
follow 7:20 21:13
74:15 211:17
followed 250:7
following 54:10
71:14 84:18 102:8
122:16, 23 123:2, 22,
25 124:11 275:4
follows 7:3
follow-up 201:5
foregoing 275:9
278:1
forgot 32:18
Form 28:19 30:17
35:25 48:18 49:3
50:2 83:24 109:13
130:11 137:21 138:4
140:17 141:3 143:17
144:2 148:13, 19
149:11 153:10 154:5,
16 155:13 157:6
189:12, 17 217:17

224:24 225:4 228:20
248:5 260:16 261:4
267:19 278:1
forma 65:4 164:24
173:14
format 56:20 75:25
79:7 125:1 130:17
134:22 170:1
formations 28:23
formats 68:4 78:10,
15
formatting 35:13
166:18
formbook 127:14
formed 68:11
forms 27:2 51:12
169:14 208:11
226:10 252:11 260:3
forth 200:24 256:1
forums 136:9
forward 274:11
found 36:23 141:18
foundation 269:9
four 12:18 66:4, 10
91:8 105:13 122:18,
22 123:8 125:11
165:5 206:20 241:10,
16
four-cornered 152:24
fourth 26:21
frames 57:6
Francisco 2:9
frankly 89:10 153:12
Fred 40:3 114:16
free 77:20 83:9
85:18 101:21 103:1
107:23 109:2 125:25
129:3 183:2
Freedom 59:24 61:4
frequently 184:20
Friday 180:12
front 12:10 109:3
250:10 257:21
263:13
full 7:12 39:23
function 104:4, 8
117:9, 11
functioned 54:6
functions 17:15

<p>18:12 Fund 2:4, 15 further 14:22 129:24 184:10 190:18 223:24 267:13 269:10 < G > gap 67:8 Garrity 12:18 19:23 39:1, 2 43:3 62:19 Gates 3:4 gathered 60:1 General 8:4 26:20 37:13 47:16 53:13 54:19 55:21, 24 56:5 66:24 68:9, 10 69:5 70:5 85:19 87:20 95:22 109:1, 11, 22 114:13 118:4 119:8 120:21 123:4 124:19 125:10 126:12 131:19, 20 133:8, 21 150:16 165:18 187:16 190:15 198:24 211:24 212:15 217:10 235:5 241:17 247:14 249:22 269:21 generalized 68:21 generally 41:18 43:14 51:6 77:15 82:17 96:2 98:11 112:5 117:19 125:9 128:9 143:24 159:8, 9 168:9, 11 190:11 191:19 200:17 205:12, 14 218:1 220:2, 3 233:23 235:6 General's 2:22 24:13 generate 114:3 168:13 generated 119:10, 18 169:11, 13 generating 120:24 157:25 158:11 168:25 generic 88:13 164:9 203:22</p>	<p>generically 64:18 89:6 95:16 122:25 169:13 232:20 Geographic 39:8 47:1 64:22 74:13 75:15 100:18 101:2 127:25 168:6 185:25 240:18 geographical 128:11 geographically 28:4 geographies 76:5 204:1 geography 26:9, 12, 14, 22, 24, 25 27:6, 10, 14, 23 28:5, 10 29:4 112:25 geological 28:23 germane 151:8 gerrymandering 132:7, 13, 15, 25 134:1, 10, 15, 18 160:6, 12 getting 30:1 149:10 151:21 167:16 201:9 234:10 268:7 giant 254:7 255:16 Gilmore 229:10 GIS 44:11 47:2 74:15, 17 165:16 169:19 249:16 give 56:7 64:18 77:25 88:7 112:5 114:11 160:7, 8, 11 202:19 229:23 247:16 262:8 271:12 given 17:14 18:23 57:23 70:8 78:4, 9, 15, 16, 17, 22 93:16 94:8 96:5 97:22 98:15 99:6 100:3, 8, 16 108:2 110:14 111:6, 9 140:22 142:10 147:12, 13, 24 153:13 154:25 159:5 164:24 174:25 179:8 191:11, 14 200:20 202:21 269:2 278:1 gives 249:11 giving 99:16 106:12</p>	<p>118:11 179:6 232:10 globally 99:19 go 26:22 27:3 28:20 30:18 37:6 45:15 48:19 52:25 63:14 85:12 86:22 98:13 102:5 109:6, 14, 20 110:8 112:24 118:3 119:3, 24 126:3, 21 131:3 133:17 137:22 138:5 155:19 157:7 163:14 164:2 169:6 179:17 186:13, 14 202:18 211:23 215:20 216:18 219:5, 11 220:7 226:20, 25 232:25 240:9 245:2 252:23 264:24 265:17 269:10 271:22 272:3 274:14 goal 125:9, 15 goals 108:14 110:21 125:13 126:9 266:24 goes 63:19 153:23 181:11 202:9 going 11:14 26:6, 22 30:21 33:16 34:1, 6 35:4, 5 37:3 42:2 47:12 50:3 54:8 62:9 68:5 69:14 71:19 73:20 89:11 91:1, 3 92:13 98:22 131:15 133:5 134:4 135:1 136:17 139:4 170:21 175:11 179:25 183:15 191:6 192:21 198:12 201:1 202:14 228:23 229:4, 5 232:12 241:9 251:7 253:3 254:16 259:24 268:4 269:10 Gold 3:3 8:1 Gonzales 216:6, 13 Good 7:6, 7 8:10, 11 68:9 73:19 74:1 90:19 136:25 137:1 228:23 274:12 Gotcha 24:6 97:11 187:18 219:19, 24 238:21 239:11 241:2</p>	<p>244:11 247:9, 24 249:8, 13 255:9 gotten 59:15 62:18 99:19 governed 127:25 128:11 government 29:16, 17 Governor 267:4 governor's 73:16 267:7 governs 132:4 gracefully 9:8 graciously 9:7 graduated 30:7 Graham 3:3 7:22, 24 11:3 gran 233:12 granted 247:22 granular 219:22, 25 264:4 Graphic 5:21 169:22 183:22 184:8, 18 187:1, 20 195:4 198:18 205:5 207:19 210:3 212:9 216:18 220:20 221:3 grappling 151:2 great 220:16 grew 25:8 ground 8:24 grounds 82:11 107:10, 21 126:20 133:16 134:18 181:18 186:15 190:6 242:19 261:16 262:16 263:4 group 70:1 72:11 160:8 231:17 232:4, 7 242:15 grouping 128:1 groups 29:20 grow 25:7 growth 122:17 Gtalley@mwlaw.com 3:6 guess 40:15 49:5 59:11 265:17 guidance 86:8 98:7, 15, 17 99:7 126:11</p>
--	--	--	--

196:8 211:1
guided 54:15 200:17
guidelines 97:25
 98:8, 18
guidelines/rules 69:1
guise 239:15

< H >
hairs 41:9
half 14:10
hand 276:16
handed 201:7
handing 145:15
handle 31:17 32:7
 34:6
handled 33:15 55:6,
 12
handles 63:24
hands-on 45:24
handwritten 60:15, 21
Hang 180:11
happen 9:14 94:23
 200:5
happened 40:20
 56:22 94:24 143:10
 171:9, 12 200:10
 211:13 221:18, 23
 224:2
happening 260:7
happy 123:11, 15
hard 60:10 61:10
 94:21 167:15 261:3,
 20, 21, 25 267:18, 21
Hartz 31:23 32:3
H-a-r-t-z 32:2
Hawaii/Pacific 168:19
Hawaiian/Island
 242:9
Hawaii-specific
 242:10
Hayden 1:20 9:6
 194:21 195:1 273:17
 275:2 276:20
HB 184:12
HB1959 140:16
 143:22 144:25 145:2
HB1960 4:20 145:13,
 21 146:16 147:24
 149:5 150:3, 6, 8

152:7, 16 153:17
 154:2
HB1961 4:24 165:3,
 22, 25 166:2, 24
 167:3, 11, 19 168:3
 170:6
HB1963 5:5 176:17,
 20 177:10, 14, 18, 24
 178:4, 7, 11, 14, 17, 20
 179:3, 7 180:7, 10, 20,
 25 181:5, 7, 16, 23
 182:2, 5, 7, 8, 11, 20
 183:5, 11
HB1964 5:9 183:21
 184:9 185:3, 5, 14, 18
 186:6, 10, 23
HB1965 195:5, 9, 12
 196:4 197:22 198:4,
 13
HB1966 5:15 210:4,
 10, 13, 17, 20, 24
 211:3, 8 212:4, 7
HB1968 5:18 214:15,
 19 215:11, 23
HB1969 5:21 215:25
 216:3, 13
HB1970 5:23 216:19,
 22 220:12
HB1971 5:24 221:5
 222:24 223:2 224:23
 225:3, 16 226:9
HB1971-MLD406
 222:4
HB1976 6:2 230:18,
 25
HB1978 6:5
HB1979 221:11
 240:21 243:5
HB1980 6:9 243:7,
 10, 13, 22
HB1981 6:9 244:4, 8
HB1982 252:1, 8
 253:5 257:10, 18
 258:4, 22 259:4, 6, 10
 260:3, 11, 15 262:12,
 18, 22, 23 265:24
 267:3, 9, 16, 25 268:3
 269:14
HB1983 6:12 245:10,

13, 22 246:1, 14, 24
head 9:10 59:16
hear 10:4 50:4
 72:19
H-e-a-r 32:1
heard 52:4 72:21
 85:6, 17 87:6 129:21
 132:8 228:15, 17
hearing 128:18
 179:24 227:2, 5
 268:24
hearings 135:21
 228:8, 9, 10, 22
heavily 68:8 235:13
hectic 235:25 236:1
 246:6
Hejazi 40:4
held 136:16 152:21
help 35:13 107:15
 108:4 137:20 138:2
 155:9 157:25 177:14
 236:14, 21
helped 150:5 174:19,
 21
helpful 75:24 84:15
helping 167:10, 19
helps 229:5
hereto 275:21
hesitation 212:21
Hester 172:14, 16
 173:5, 10 174:10
Hey 252:24
highest 227:14
high-level 69:9
highly 126:7
his/her 275:14
history 29:22
hold 59:1, 2 118:9
 131:16 149:4 150:22
 176:1
home 13:6
honest 128:3 221:14
honestly 59:11 92:10
 138:6
hooked 254:12
hornbook 37:13
 68:10 131:20
host 80:14
hosted 37:18 136:9,

13
hot 134:22
hour 14:10
hours 55:25 71:20
House 4:20 6:15
 11:25 34:12 38:16
 40:22, 25 41:4, 13
 79:23 80:8, 9, 23
 137:10, 18, 19, 20, 24
 138:3, 10 140:22, 23
 141:21 183:16 196:2
 214:25 220:20 227:1
 230:4 233:17 241:3,
 5 243:25 245:3
 251:9, 11 252:6
 268:14, 20
housed 142:15 153:8
House-related 80:24
how's 194:21
human 9:11 26:14
husband 71:18
Hutchinson 267:4
hypothetical 86:17
 103:2 131:1, 4, 11
 179:11 200:8 203:6
 211:20 272:10

< I >
idea 31:11 49:11
 71:13 74:19 75:1
 83:19 84:5 86:25
 115:3 143:14, 17
 152:21 160:4, 13
 161:16 191:25
 228:23
ideal 66:2, 5, 7
 159:15 164:4
ideas 98:25
identifiable 129:16
identification 89:13
 104:16 114:10 135:3
 137:13 145:14
 160:17 165:9 172:8
 174:17 175:15
 176:10, 19 183:18
 187:4 198:20 205:6
 207:22 210:7 212:13
 214:16 216:2, 20
 220:24 226:23 230:7
 233:18 235:3 240:13

243:9 244:3 245:5
249:19 251:15
263:17
identified 120:8
135:2 173:14 176:11
218:10 233:9 276:7
identifies 158:17
206:17
identify 8:20, 23
83:11 193:22
identifying 42:12
95:17 127:18
identities 226:17
260:21 261:12
identity 193:1
illustrated 105:14
illustrations 221:3
Image 5:5, 12, 15
160:16 217:2, 19, 25
218:1, 5, 13 219:6, 21,
22 220:1 249:23
250:7 263:20, 22, 24
Images 4:20, 24 5:2,
5, 9, 15, 18, 21, 24 6:2,
5, 9, 12, 15, 17 78:22
137:10 145:12 165:2,
22 172:4 174:14, 18
175:1, 9, 11 176:16
177:9 183:15 184:18
186:25 188:8 195:6
196:2, 17 198:4, 17,
21 207:18 215:25
217:6, 16 218:9
219:15 220:25 222:9,
11 226:21 229:9
230:4, 8 233:16, 19
234:25 235:4 240:17,
22 243:7, 24 245:2, 6
246:10 249:21 251:9
263:14
imbalances 122:15, 21
immediately 208:22
Impact 72:10 228:2
impacted 123:8
impacts 27:23
impartiality 275:25
implement 86:7
94:13 107:15 110:18
130:5, 10 131:7

154:19 175:25
177:14 247:11
implemented 177:21
203:18 228:9
implementing 93:13
129:7 130:22
import 191:8, 25
192:5
important 90:7
imported 191:7
importing 95:10
191:10 192:3
inappropriate 94:8
include 29:7 34:3
53:20 76:6 84:20
107:2 161:21 181:6,
15, 22 251:8 262:1
included 76:9 97:20
105:25 106:5 109:18
116:10 119:12
126:22 142:25 145:7
147:7, 23 159:24
160:5 164:10 168:10,
14 169:1
including 27:15
56:18, 19 113:23
179:18 194:21
inclusion 148:1
incorporate 149:15
incorrectly 177:22
increase 123:3, 17
124:5
increasing 123:20
incredibly 171:25
223:17
incumbent 79:11, 19
159:1
incumbents 158:19,
22, 23
independent 26:18
55:2 116:1 189:21
225:25 248:16
independently 115:21
indicate 53:16 120:9
indicated 104:2
115:24 230:23
250:12
indicates 240:20
indicating 263:18

indication 157:20
271:12
indicator 104:5
Indiscernible 236:16
individual 17:16
18:16 22:20 77:16,
17 88:19 95:25 96:1
107:18 111:1 138:8
159:13 221:18
231:21 264:19
individually 231:17,
19, 20
individuals 22:20
inform 15:3
informally 227:2
information 16:7
17:6, 7, 9, 18, 20, 24,
25 19:2 35:18 38:3
39:8 43:9 51:15
55:5 59:24 61:4
66:12, 22 67:20 68:3,
6, 8, 11, 20, 21, 24
70:16 74:14 75:9, 13
78:9, 11, 15, 16, 17, 18,
20, 25 79:3, 4, 23, 25
81:9 82:11 86:1, 4, 7,
12, 14, 24 87:1, 3
88:7 94:1, 5 95:15
97:20, 21, 22 106:13,
16 108:9 111:11
113:14 115:3 120:17
121:11, 14, 17, 19
125:23 126:16 127:1,
19 128:7 129:6
131:12 136:10 142:5
143:1, 12 146:17, 23
147:11 148:5 149:4
151:1, 5, 8 152:1, 15,
20, 22 153:2, 8, 16, 17
154:10, 19, 23 156:7
157:15, 25 159:1, 4,
14, 21 160:10, 13
161:19 162:9 163:15
164:16 167:13, 18, 20
168:7, 10, 14 169:1
170:1 172:3, 21
173:6, 12 174:10, 11,
25 175:2, 8, 24 176:1
177:13, 21, 22 179:4,
6, 12 180:2 181:4, 12,

14 183:4, 10 185:17,
21 186:5 187:23
190:10, 13, 25 191:20
197:7, 10, 15 199:24
200:16 201:1, 14
202:8, 17, 20, 22
203:3, 24, 25 204:12,
15 205:1, 18 208:9
210:22 215:14, 18
223:19, 20 224:14, 20,
23 225:10, 13, 21
226:3, 5, 15 227:18
228:9 229:23 230:24
231:3, 13, 14, 15, 16,
24 232:10, 13, 16
234:23 236:3, 5
240:18 241:16, 23
246:9, 11 247:5, 8, 9,
25 248:14 255:4
256:1, 18 260:2, 15,
24 261:7, 17, 21
262:12 265:13
266:11
informations 225:1
informed 15:4 19:24
33:20 150:15
initial 95:15 105:11
106:3 211:6 217:20
234:8, 12 250:2
initially 91:24 96:15
105:20 164:8 229:15
initials 137:25 139:7
256:25
initiated 38:5 59:10
252:13
in-person 40:1
196:10 206:6 209:18
224:3 262:4
input 79:6 108:8
inputs 191:14
inputted 177:22
inputting 84:8 192:7
inquiry 182:24
inside 199:8
Instagram 31:7, 9, 17,
19 32:23
instance 1:17 101:10
instruct 77:15 82:10,
24 83:8 85:20 86:18
93:25 95:24 99:2, 22

<p>101:18 107:10, 20 108:16 110:23 112:7 117:22 125:21 126:18 128:22 129:11 131:1, 11 133:14 148:21 149:19 162:3 166:7 179:14 180:15 181:19 182:12, 22 183:8 186:14 188:16 190:6 193:5 194:8 199:17 202:3 206:16 219:1 223:22 226:16 227:16 242:18 260:20 261:11 262:14 263:2 264:24 267:12 268:5, 10 instructed 77:12 79:4 82:6 99:13 154:11 instructing 93:11, 12 instruction 63:21 78:4, 5 83:5 94:7 95:20 100:6, 14, 22 102:2, 3 109:4 119:2 125:3 143:5 147:25 166:16 180:22 181:2, 25 183:13 189:20, 23 190:13, 15 192:21 203:19 248:10 263:11 266:10 instructions 18:23 77:25 86:8 93:20 94:13 95:7, 12 97:18 98:24, 25 99:17, 18, 24 100:3, 9, 17 101:15 102:8 140:22 141:13, 19 142:10 143:2, 6 147:11, 19 151:16 instructs 10:8 insurance 276:9 intend 270:1 intending 118:7 220:6 intensive 235:14 intent 106:22 107:4, 8, 15 108:1, 20 109:7, 8 111:1 148:8, 13, 17, 24 149:9, 16, 18</p>	<p>151:10, 11 266:2 272:11, 17 intents 130:15 interact 56:6 interaction 72:20 248:2 interactions 54:16 211:21 229:18 249:10 272:14 interest 127:13, 18, 22 128:9, 14 129:8, 16 130:6, 8 182:17, 19 183:5 276:6 interested 99:15 275:22, 23 internal 110:6 interpret 98:8, 17 interrupt 8:20 introduce 89:7 introduced 63:16 64:1 96:4, 10, 12 157:1 163:7 164:11, 15 177:4 184:11, 14 206:25 207:25 210:11 217:22 221:5, 9 225:1 231:6 236:6 243:25 249:25 256:16 257:20 263:19 invited 70:3 invoked 142:20 266:8 involve 16:11 involved 24:1, 15, 18 50:3, 20 96:17 161:12 174:5, 6 176:4 196:13 252:12 260:4 261:8 268:8 276:10 involvement 43:24 128:6 involving 24:8 Irvin 249:25 250:1, 16, 24 island 67:10 Islander 168:20 242:10 isolated 67:11 issue 129:25 233:2 257:16 271:24</p>	<p>issues 24:25 36:16 60:21 134:22 166:18, 22 items 29:4 33:18 iteration 144:15 197:22 iterations 139:15 140:17 144:15 145:22 146:17 147:11 149:24 150:2 163:6 195:19 205:17 206:22, 25 its 28:5 40:13 78:12 139:15 140:16 143:16 144:14 145:21 226:10 228:2 231:21 248:15 252:11 260:15 < J > January 33:25 263:19 Jcusick@naacpldf.org 2:6 Jennifer 4:17 114:7, 15 job 107:15 108:8 110:17 130:17 146:9 174:3 202:11 228:17 jogs 217:2 JOHN 1:6 2:3, 18 8:9 213:18 Johnson 39:7 47:7 113:22 160:24 161:4, 8 162:10 163:21 166:14 212:17, 19, 22, 23, 24, 25 213:4, 6, 11, 18 214:6, 9, 12 Joi 36:9 43:1 join 15:24 Jordan 2:21 8:12 Joseph 2:13 Josh 89:9 jot 60:18 judge 9:3 judgment 189:21 July 1:13, 19 4:2 16:1 276:17 jump 8:19 82:9 86:16 108:16 110:23</p>	<p>220:22 221:7 251:11, 18 268:5 June 15:23 justify 126:13 Justin 2:21 8:3 Justin.brascher@arka nsasag.gov 2:24 Jwong@naacpldf.org 2:17 < K > keep 54:8 71:11 130:21 192:22 193:5 263:13 Kennebrew 22:2 Kenneth 89:10 kept 103:25 121:13 261:22 Kevin 15:4 kind 43:9 53:14 122:4 149:7, 8 150:12, 24 151:1, 5 152:11, 13 157:14 180:11 183:25 189:2 190:15 191:25 192:4 200:24 202:24 229:5 254:14 kinds 29:1 56:4 knew 34:7 37:2, 3 44:11 52:22 53:4 57:5, 19 75:14, 15 85:4 87:24 90:25 115:2, 18 134:11, 21 160:25 171:12 227:24, 25 know 9:12 10:16 12:23 14:8, 20 18:10, 15 19:7, 12 20:13, 14, 19 21:1, 20 22:2, 8 24:10 29:15, 16 31:16 33:23 34:5 35:15 37:5 38:15, 18, 19, 25 39:12, 24 40:1, 5 42:7 44:13 49:9 53:2, 8 56:3 59:11 60:1 61:16 62:1, 11 63:3, 8, 23 64:23 65:2 66:23, 24 67:1 68:18 69:17, 23 71:11 72:2, 5, 6, 9, 10,</p>
--	--	---	--

13 73:5 74:11, 21
75:20 76:8, 10 77:20,
22, 23, 24 78:10, 19
80:13 81:12, 23, 25
82:23 83:10, 20 84:1,
19, 21, 23 87:10, 13
88:18 90:8, 11, 13, 16
91:23, 24 92:6, 9, 22
95:19 103:23 104:1
106:25 108:21
109:16 110:20 111:8
113:7, 14 115:8
116:5, 7, 19 117:21
118:6, 14 119:10
120:15, 17, 18 121:7,
13 122:21, 25 123:6
124:4, 7, 20 125:9, 20
126:4, 6 127:17, 24
128:12 129:15, 25
131:22 133:12 136:1
143:14 147:23
148:13 149:8 150:7,
14, 25 151:19 152:6,
11, 15 153:1 154:9,
10 156:25 161:14, 17
163:20 167:13
171:24 174:8 176:15
185:11 187:25
192:17 193:1, 11, 18
194:24 195:2 201:24
202:1, 24 203:13
208:18 211:5 213:25
221:19 222:15, 21
223:7, 24, 25 224:3
230:10 235:11 236:9
237:2 242:5 243:16,
19 246:3 249:22
250:3 253:11 256:17
260:24 265:8, 18
268:17 269:6, 9
271:17
knowing 34:1
knowingly 276:7
knowledge 43:20
47:16 50:13, 22
57:22 75:8 85:19
120:16 125:24
131:25 156:20 204:8
219:3 226:13 227:21

258:8 266:19
knows 171:3

< L >
labeled 115:12
lack 164:9
Laden@naacpldf.org
2:6
Ladyman 146:3, 6
148:15 149:3 150:5
153:8
Lake 37:16
lakes 27:12
land 29:8
language 34:25 35:2,
8, 16 90:1 109:17
115:13, 15 116:7, 9
158:17 178:5 184:4
laptop 54:4, 7 60:8
laptops 54:3
large 51:25 254:10,
19
largely 141:4
late 33:20, 23 36:23
47:11 48:8 57:11
71:20
Law 11:13 26:18, 23
30:1, 5, 22 36:14
37:11, 12 47:16, 19,
21 68:10, 13, 16 69:5
124:25 125:14 127:4,
14 128:5, 15 129:25
131:20 132:3, 9, 18,
24 133:23, 24 134:16,
23 239:1
lawsuit 13:18 20:18
21:12 23:14, 25
lawsuits 24:5
layer 150:19, 25
layers 150:13
LDF 8:15
lead 247:2
leaders 268:14
leading 55:15 56:9
126:8
Leah 2:3 7:8
118:11 145:17
192:25 253:19
learn 24:23

learned 12:21
227:18 228:10
learner 45:25
learning 45:6 47:11
leave 122:2 152:2
274:2
leaving 274:1
led 260:15
Leding 176:12
Lee 7:14
leeway 118:11 268:9
left 61:24 115:4, 14
202:23 222:3 240:20
249:17 270:11
274:10
left-hand 252:2
Legal 2:4, 15 11:15,
18 16:5 18:14 19:7,
13, 16 36:12 51:24,
25 52:2, 11, 15 53:2,
13, 22, 25 59:1 60:8
71:9 77:6 80:14
86:8 88:3, 14 93:4
94:22 97:4 99:16
110:16 111:21, 23
112:2, 13 138:1
140:18 146:18, 25
153:18 161:5 162:19,
24 167:4 172:23
173:2 174:23 175:22
177:11 185:6 187:21
191:4 196:5 199:9,
22 206:8 208:7
209:22 210:21
213:16, 19 223:12
233:14 253:6, 14, 16
254:18 255:5, 11, 18
256:4 260:8 261:3,
18 267:17, 20
legislation 16:24
35:7 55:11, 12, 14
77:18 82:14 83:12,
14, 16 86:21 104:10
107:19 108:10, 19
111:3 139:6, 8
154:20 164:11 177:4
184:20 189:1, 4
201:15 202:6 232:11
239:8 250:4 253:21,
25 258:13, 20 261:9

266:1, 5 268:23
269:7, 16 273:5
LEGISLATIVE 3:2
7:25 15:17, 18 16:3,
7 18:5 37:1 41:17,
18 47:21 49:2, 10, 15,
22, 24, 25 57:2, 8
58:8 63:11 69:6, 21
70:2 72:7 80:16
82:11, 25 83:7 85:21
96:23 97:15 98:7
99:4 105:4 107:9, 21
108:18 110:25 112:8
128:24 129:2, 12
135:25 137:5 142:20
147:20 148:22
149:20 150:17, 20
151:18 162:5 165:19
173:15 179:15
180:16 181:18
182:14 183:7 188:17,
22 190:5 194:12
198:22 219:2 226:6
227:19 228:19
242:20 258:7 262:15
263:4 266:8, 17
267:2 268:13 273:24
274:4
legislator 42:10, 11
45:17 49:18 50:9, 23
51:2, 4, 6, 8, 15 55:19
64:17 65:14 71:23,
24 84:2 86:1, 3, 11
90:23 93:11, 19 94:6,
17 95:18, 21 98:23
99:12 101:16, 18
102:9, 21 107:4, 7
110:19 112:1, 2
118:2, 23, 25 119:7
125:4 130:5, 7, 19
131:6 140:8 141:25
142:11 143:2 145:3
148:16 150:5 154:2
156:22 157:2, 4, 11,
25 158:12, 21 159:5
160:11 161:7 167:23
170:10 173:10, 22
182:23 185:2 186:23
192:10 194:16
197:11 198:15

<p>201:22 204:19 206:18 220:11 223:2 225:12, 22, 24, 25 227:19 228:12, 18 230:2, 14, 17 231:8 237:10, 22 246:15 247:2, 3, 11, 14, 18 250:18 259:15 260:11 262:2 272:15, 21 273:7 legislators 19:19 45:11 51:8, 12 52:15, 21 53:2 54:16 56:11 58:22 62:7 64:9, 13 69:14, 17, 20 71:22 86:7 87:4 94:14 96:10 98:2, 4, 17 101:14 104:22 107:7, 14 108:4 110:16, 20 111:21 112:13 117:19 118:9 119:7 139:14 140:6 141:2 142:1, 16 147:13 154:3, 13 169:15 175:5 176:4 196:12 205:24 206:5, 14 207:10 209:12, 17 210:16 220:2 226:18 231:17 232:2 234:18 237:23 238:5, 14 245:9 248:3, 8 259:1, 21 260:22 272:12, 15, 18 legislator's 157:4 legislature 16:6, 12 18:8, 22 38:10 40:12, 19 55:16 58:4 62:25 63:12, 21 65:11 70:9 105:20 108:21 111:8 121:1 126:10 139:20 148:8 179:14 211:22 length 153:14 Leonard 36:9 43:1, 2 letter 11:10 59:2 level 66:19 75:16, 17, 18, 19, 20 81:12, 16 82:3, 7 83:3, 11, 20 84:2, 7, 9, 11, 15 88:25 89:2, 3, 4 184:11 218:6, 13, 16</p>	<p>219:10, 12 220:1 244:13, 24 264:4 levels 76:15 192:2 264:1 LEXIS 60:14 light 106:18 218:2 liked 254:24 likewise 20:14 limestone 28:25 29:5 limitations 134:15 limited 202:9 line 27:18 80:16, 17 105:21 106:20, 23 107:2, 8 117:1 128:19 129:17 135:22 149:8 189:2 190:9, 21 219:6 259:25 277:1 lines 45:15 76:2 81:2, 4 83:21 88:9 104:3 107:16 108:5 113:18 121:22 133:5 167:15 192:8 202:14 218:2, 3, 4 252:20 265:3 266:13 link 170:19 LinkedIn 32:18, 19 list 115:18 129:15 276:8 listed 235:16 listen 37:17 listening 228:7 229:1 LISTSERV 37:5 litigant 23:23 276:9 litigation 7:9 20:2 21:7 22:6, 21 23:5, 10, 24 24:16, 17, 18 59:2, 6, 8, 18 64:6 68:17 134:3, 8 165:14 Little 1:23 2:23 3:5 24:23 25:11 26:1 30:5 45:19 78:2 121:4 141:6, 7, 10 142:23 151:12 219:4 254:4 268:9 live 25:10 27:7 39:18 46:1, 10 207:17</p>	<p>lived 25:12, 13, 14, 16 26:3 80:1, 2 LLP 2:8, 11 load 265:18 loaded 48:13 51:22 80:11 85:1, 4 88:4 191:3 200:15 loading 90:14 lobbyist 50:14, 15, 17 73:5 located 67:11 locked 114:17 log 271:5 logistical 10:16 long 14:8 15:9 25:12 31:9, 13 32:20 38:1 56:8, 11 140:14 161:14 166:19 208:18, 21 longer 272:25 long-running 101:10 look 28:24 66:2 67:23 88:13 89:6 97:24 103:9 113:10, 15 114:19 120:7 127:23 136:21 168:17 174:5 184:4 187:24 203:10 221:10 222:3 229:3, 6 233:1 241:21 256:23 264:3 looked 39:24 45:5, 23 114:17 115:22 123:13 126:5 134:9 156:15 168:13 170:18 233:12 looking 13:23 27:6 28:22 29:5, 7 59:14 61:8 80:13 81:25 84:17 87:24 88:5, 14, 16 89:5 90:20 91:12, 18 92:24 97:13 99:12, 13 115:10, 14 116:13 120:6 123:14 128:5 132:10 138:9 155:21 159:19 163:24 168:5, 12 169:5 173:12 177:25 202:10 217:25 218:13 219:12 229:7</p>	<p>235:20 241:17 256:20 257:2 looks 91:14 114:19 221:8, 10 222:15 229:16 242:7 244:13 251:25 263:25 Lori 39:12 43:5 45:1 52:7 111:17 138:25 140:12 146:1 161:12 195:22 215:2 216:4 235:12 252:19 254:15 256:19 Lorie 15:7 lost 141:6 244:17 lot 32:3 46:3 51:13 60:20 68:11 75:13 159:25 177:3 229:1 272:9 Love 233:21, 24 234:4, 7, 15, 16, 19, 23 Loyd 271:11, 14 LS 276:20 lunch 10:17 136:19, 23 Lynette 22:13 < M > ma'am 11:17 33:6 53:14 104:17 137:8 194:3 214:17 251:20 Mable 22:15 machine 1:21 85:5 265:3 macros 35:12 maiden 31:24 main 76:24 maintain 226:1 maintained 31:9, 13 32:20 maintaining 129:19 maintains 63:11 major 26:9 Majority 115:16 117:8, 13 majority-minority 115:24 116:3 117:2 maker 44:11 makeup 28:5 100:11 170:25 181:22</p>
---	--	--	--

<p>making 7:18 16:11 35:21 45:2, 15 90:21 93:2, 4, 6, 10 95:20 127:15 133:23 161:23 174:6 182:19 Management 72:11 manner 78:19 156:11 266:20 manners 27:1 manual 34:23 35:17 manuals 45:24 map 20:24 21:8 22:24, 25 23:7 24:17 34:6 35:23 43:7 44:12 45:20 46:6, 19 48:23, 24 49:7 50:6, 8, 9, 24, 25 51:3, 7, 14 52:5, 9 53:17, 20 54:2, 13 55:13 56:12, 16 57:14 64:10 65:5 67:16, 22, 24 68:1 74:6, 22, 23 78:17, 18, 23, 24 79:8 84:8 85:10 86:4 87:20, 22 88:9, 15, 16 89:5, 6, 11, 17, 21 90:1, 14, 20, 24 91:12, 13, 18 93:2, 23 94:11, 16, 21 95:6, 18 96:4, 6, 7, 13, 14, 20, 21, 22, 24 97:1, 14 98:23 99:8, 14, 16, 17 102:22 103:12 105:13, 16, 20, 24 106:8, 18, 21 108:1, 10, 14 110:19, 21 111:10, 20, 22 112:3, 6, 11, 16, 17, 20 116:8, 11 122:6, 12, 13 123:7, 11 125:8 129:7, 9 130:9, 23 131:9 138:14, 20 139:14, 18, 23 140:2, 3, 9, 11, 13 141:21, 25 142:6, 9 143:5, 10, 13 145:4, 21 146:2, 6, 7, 15, 20 147:8, 10, 12, 14, 17, 18 148:3, 17, 25 149:2, 18, 23 150:1, 18 152:18, 19 153:9, 21 155:2, 11</p>	<p>156:9, 18, 23 157:18 158:1, 5, 15, 18, 23, 24 159:1, 12, 15 160:7, 19, 23 161:23 162:2 163:18, 20, 23 164:8, 11, 15, 25 166:5, 19 167:2 168:2 170:9 171:1 172:24 173:6, 21 174:5, 22 176:8, 14, 15 177:20 178:3, 25 182:8 183:20 185:7 187:20, 24 189:19, 25 190:1, 2, 14 191:15 192:20 193:9 194:15, 18 195:14, 17, 19 196:13, 19 200:22 203:8, 15 204:22 205:11 206:23 207:1, 2, 17 209:4 211:6, 9 215:10, 17 216:10 217:3, 19, 24 218:17 219:23 221:4, 9, 20 223:14 226:25 228:16, 21, 24 229:4, 18 230:20 233:21 234:8, 12 235:10, 13, 18 236:5, 10, 12, 22 237:3, 5, 10, 17 238:1, 6, 15, 19 239:16 241:7 244:18 247:12 248:10, 11, 16, 21 249:5 250:2 251:1 252:13, 19 255:3, 7, 10, 11 256:18 257:23 258:18 261:19 263:1, 8 264:14, 16, 22 265:6 266:4, 14, 15, 20, 22 270:21 273:4 mapmaking 44:15 71:1, 16, 25 72:4, 8, 11 73:3, 6, 8, 16 143:24 144:17 203:4 205:13, 15 234:4 235:8 253:23 mapping 27:2 55:9 177:12 240:25 255:13, 16 maps 5:15, 18 6:12 34:3, 4, 15 43:11, 19,</p>	<p>22 44:2, 21, 24 45:8, 10 48:2, 12, 16, 20, 24 49:2, 9, 12, 13, 15, 17, 24, 25 50:11, 14, 17, 19 51:11, 18 52:8 53:16, 23 54:10, 17 58:12, 22 60:16 64:9, 14 71:14, 19 74:9 75:9 77:10, 13 79:12 80:4, 6, 18 81:3 82:4, 8 84:3, 12, 16 85:10, 13 87:15, 18, 24 90:13 97:17, 24 98:1 99:1 101:14, 23, 25 105:5, 8 107:6, 19 110:17 111:16 113:8, 10, 12, 17 120:22 121:5, 16, 19 123:13 127:8, 16 128:21 131:23 136:12 137:4, 6 138:2, 7, 25 144:12 145:9, 23, 24 154:14, 25 155:10 161:11 163:18 169:21 172:10, 17 173:15 175:16, 18 176:20, 22 177:1, 10 178:1, 8 183:3 184:4 185:3, 5, 13 186:2, 23 187:5, 16, 17 188:3, 15 189:15 190:17, 25 192:11 193:19 195:12, 16 196:4, 17 198:4, 13, 23 199:3, 4, 5, 7, 16 201:21 202:11 204:14, 16, 25 205:7, 17 207:23 208:6, 16, 19, 25 209:9 210:4, 8, 10, 13, 17, 20, 23 211:2, 8 212:4, 14, 20 213:4, 5, 14 214:12, 14, 21, 24 215:23 216:3, 22 217:7, 14 218:17, 23 221:19, 24 222:24 223:21 224:10, 15, 20, 23 227:3 229:12 230:11, 18 233:24, 25 234:15, 20 237:1 239:1 240:5 244:8</p>	<p>245:22 246:1, 14, 24 249:15 250:1, 14, 18 252:1, 16 253:12 254:8 256:8, 16 258:4 259:4, 8 260:3 269:22 270:17, 18, 25 273:6, 10 map-specific 164:24 mark 114:3 135:1 137:9 145:12 155:18 165:2 172:4 174:13 175:11 176:7, 16 183:15 186:25 194:20 198:17 205:4 212:23, 25 213:1, 2, 4, 11 220:19 230:4 233:16 234:25 242:22 243:24 249:13 251:7 263:14 MARKED 4:6 89:13 104:16 114:10 135:3 137:13 145:14 160:17 165:9 172:8 174:17 175:15 176:10, 19 183:18 187:4 198:20 205:6 207:22 210:7 212:13 214:16 216:2, 20 220:24 226:23 230:7 233:18 235:3 240:13 243:9 244:3 245:5 249:17, 19 251:15 263:17 marker 240:20 marking 104:11 113:20 207:18 210:3 214:14 215:25 Marty 12:18 38:25 match 149:7 materials 12:7 62:6, 11 64:5, 8 matter 12:20, 25 14:19 21:5, 6 24:7 33:15, 16 119:5 163:21 188:20 217:17 250:24 276:10 matters 11:7 24:14 94:3 160:25 275:7</p>
---	--	--	---

Matthew 4:6 36:6,
10, 13 38:24 39:2
42:22 43:1 45:5
61:18 89:9 104:12
107:1 110:7
Matthew's 61:8
mean 16:9 26:11
27:11, 25 34:9, 11
54:23 66:1 67:7
76:13 77:1, 2 78:7
79:25 80:8 81:18
101:8 108:3 115:19
116:21 125:3 152:11
169:24 180:1 222:8
233:3 237:5 266:18
Meaning 56:18
119:19, 22 152:13
means 9:1 16:10
40:23 67:8 102:23,
24 127:13, 25 136:4
191:17 202:19 203:4
222:10 246:19
270:24
meant 54:22 106:25
162:6, 13 163:16
measure 103:21
measures 102:13
182:4
mechanics 141:4
media 31:4 32:13
Meeks 210:11, 14, 23
211:2 212:7
meet 7:10, 11 14:2
51:22 52:19 53:3
157:18
meeting 13:3 14:1
41:3, 12 42:7 56:15
57:2 63:8, 15, 16, 18
64:2 127:2 129:4
133:19 136:2, 14
157:1 170:13, 16, 22
171:4, 10, 12 196:10
206:10 212:1 215:9
217:20 227:7 245:25
meetings 41:17, 19,
23 42:4 52:20 57:8,
19, 21 58:3 63:13
135:23, 24 136:1, 15
184:14 206:13, 14
207:3, 10 208:16

211:8, 21 213:18
246:5
member 16:9, 21
17:8, 12, 19, 23, 24
18:1, 3, 10, 17, 19, 20,
21, 25 49:19, 22, 24
50:1, 3, 7 52:24
54:12, 19 55:1, 2, 3, 4,
8, 16, 21 57:9 65:8, 9
70:2 71:25 73:8
77:17, 24 78:3 79:23
80:7 82:13 84:18
86:19 88:1 94:1
95:25 107:19 108:21
111:7, 24 118:3, 23
119:8, 16 121:1
147:22 150:16
161:10 165:18
188:24 189:23
190:14 191:9 192:15,
19 201:2, 16 202:6
203:13 217:10 223:5,
15 224:8, 12 229:1, 4,
19 234:10 248:24, 25
249:1, 11 255:22
271:16
member-related 171:8
members 16:7, 15
17:11, 16, 21 18:5, 7,
11, 15, 18 19:14
21:14 41:4, 5 49:2,
10, 12, 13, 16 50:1, 12
51:23 54:20 56:1, 6
58:9, 11, 13 62:24
65:11, 18 69:6, 23, 24
70:5, 8 71:15 73:3
79:11, 20 82:12 88:7
96:1 97:18 98:8
105:4, 12, 19 109:11,
22 111:1, 8 118:25
120:21 126:10, 12
133:8 136:11, 14
139:6 145:24 146:10
150:21 163:19
166:23 171:19 174:4
179:13 184:19
207:11 211:22 216:8
217:13 223:8 227:2
228:5 231:25 254:10

261:13 266:17 267:1
273:3
member's 17:13
19:6 53:20 141:15
248:17, 21 249:7
membership 19:10
34:13 40:13 110:11
memory 154:22
217:2
mentioned 13:17, 23
14:12 22:23 26:6
30:1 40:8 41:11
43:2 52:14 60:7
62:14, 17 65:20, 25
66:14 67:6, 15 81:15
91:6 94:10 112:15
114:2 221:7 239:20
241:19 255:23
merge 113:7
met 14:8 22:8 58:7
102:12 221:20
metadata 153:23
metes 75:15 83:13,
16
methods 94:25 95:1,
9, 14 97:12, 16
mhartz 32:8
mhartzdavenport
31:18, 20 32:9
Michael 2:15 8:14
MICHELLE 1:12, 16
4:6 7:2, 14 31:23
42:19 275:5
Michelle's 195:22
microimage 216:25
mid 48:8
middle 31:24 213:22
246:5
midst 208:20
Miller 4:15 36:6, 10
38:24 39:2 43:1, 2
45:5 61:18 62:18
89:10 104:12 106:4
110:7 135:12 171:21
Millsap 276:21
mind 7:12 9:8 30:3
65:2 73:25 118:16
123:14 131:6 166:20
183:1 203:9, 14

mine 114:19 257:8
minimal 37:7
MINISTERIAL 1:3
21:15 22:5
minority 115:16
117:8, 13 131:18
232:24 233:3, 4, 7
minutes 73:21
236:24 270:6
Mississippi 28:1, 2
Mitchell 1:22 3:4
11:3, 5, 11, 13
MLD 222:6, 14
257:25
mobilized 29:21
module 39:23 115:4
moment 120:7
Monday 13:3, 12, 13
month 15:11, 21
morning 7:6, 7 8:10,
11 20:13
mountain 27:15, 16
28:6
mountains 27:12, 16,
20
move 28:7 37:25
57:5 81:2, 4 92:13
93:10 203:14 274:10
moved 91:19 92:17,
21 93:8 155:3 229:2
264:2, 10, 13, 15
265:9, 15
movements 93:2
moving 56:24 91:12
92:23 178:1 192:2, 8
264:21 265:3
Mskocpol@naacpldf.o
rg 2:18
muddy 151:12
multiple 29:16 33:16
48:24 134:3 145:25
161:2 177:24 203:4,
15 206:13, 22, 24
207:2 208:15 211:8
231:5, 10, 13, 24
238:5 239:21 248:3
Mx 2:6 8:6 243:2
249:14
Myers 2:8, 11 8:7

< N >

NAACP 2:4, 15
name 7:12, 13, 19
21:18, 20 22:9, 14
23:22 31:22, 24, 25
44:9, 10 47:10 53:19,
20 61:8 72:14, 21
73:1 115:12 146:21
147:9 192:14 193:23
248:17, 22 249:7
257:14 271:7
named 23:25 24:3,
12 40:3 271:10
names 72:18 88:23
115:21 116:6 122:7
140:6 169:12
naming 71:22 112:2
narrative 139:19
157:16
National 72:3
nations 29:17
nationwide 124:20
Native 168:20 242:10
naturally 184:21
nature 44:18 53:15
60:20 169:23 170:3
190:10 192:6 221:23
261:24 262:7
NCLS 46:23
NCSL 37:5, 12, 16,
18 68:9 69:20, 24, 25
85:17 134:7 135:10
159:22 160:1
near 140:16
nebulous 131:19
necessarily 65:11
118:3 127:25 128:10
140:2 148:5, 9
233:25
necessary 8:21 81:2
need 9:13 28:24
42:7 56:2, 4 65:16
133:3 140:23, 24
150:4 169:2 198:8
209:7 212:24 254:18
260:16 261:2 270:5
needed 37:6 57:10
104:9 116:8 122:22

123:21 255:1 269:22
needs 10:3
neither 275:17
NEPA 128:4
network 254:13
never 54:4, 6 61:25
87:2 192:4 228:8
240:23
New 2:5 35:7
106:18 108:7 136:18
160:7 248:21 249:5
Newport 2:12
nice 7:10, 11
nodding 9:10
non-BLR 50:12
178:17 192:19 224:8,
12
nonlegislative 50:12,
20
nonlegislator 178:17
192:19 209:14 224:8,
12
nonlegislators 206:1
nonpartisan 16:4, 8,
14 17:4 70:1
nonparty 194:10
Northwest 27:17
28:7 123:3
note 142:18 145:16
160:6 165:11 261:14
266:6
notebook 37:23, 24
noted 10:6 278:1
notes 60:15, 21
notice 13:15 17:8
157:19 216:24
noticed 242:25
number 66:3, 5, 7
113:22 123:10 124:1,
17 140:15 154:25
155:1 164:4, 5
184:12 218:10
220:23 221:21
222:14 223:3, 6
225:5, 19 231:2
237:3, 5, 6 239:22
241:6 244:18 249:2
251:12
numbered 1:18

numbers 76:1, 6
83:15 88:19, 20
91:21 106:10 113:3
138:24 156:14
157:13 164:20 168:2
221:8 223:4, 10
225:6 230:11 236:10
239:19, 21 242:8
258:1 264:6
NW 2:16
NY 2:5

< O >
oath 8:25
object 10:5 28:19
30:17 35:25 48:18
49:3 50:2 99:2
107:9 109:13 128:22
130:11 137:21 138:4
141:3 144:2 148:19
149:11 153:10 154:5,
16 155:13 157:6
179:23 181:17
182:12 183:6 189:12
190:5 194:8 199:14,
17 201:17 224:24
225:4 240:11 242:18
248:5 258:6 260:20
261:4 262:14 263:2
267:19
objection 10:5 83:4
98:20 100:5, 13, 21
102:1 119:1 149:14
180:21 181:1, 24
183:12 263:10 269:3
objections 186:19
obligations 32:16
75:3 80:23
observing 228:7
obstructing 151:20
obtained 86:14
occasion 94:24
118:22 199:2 200:5
206:12 217:18 231:7,
11, 12 237:9 247:1
Occasionally 43:16
52:6
occasions 231:10
occupied 223:15
occur 249:12

occurred 141:14
204:23 206:11 222:1
255:17
October 170:12
offer 98:7 192:22
offered 38:25 217:13
258:5
offering 98:16 108:4
Office 2:22 8:4
13:9, 24, 25 14:23
20:13 24:13 39:7
47:8 51:19, 23, 25
52:2, 11, 19 53:5, 7
71:8, 9 73:16 153:18
245:24 255:21 256:6
260:9 267:7
officers 18:13
official 1:7 2:18
44:2, 14 45:21 48:3,
7, 12, 17 58:4, 7, 19,
20
officially 58:14, 17
officials 69:25
oftentimes 57:9
oh 257:3
Okay 9:6 11:2, 4, 10
13:17, 23 20:16
21:14 22:4, 8 24:15
29:11 33:4 38:12, 15
40:8 43:15 44:7
47:11 48:1, 6 53:22
54:8 58:21 60:6
61:6, 13 62:14 63:25
65:25 70:15, 24 71:3
73:18, 24 75:5 76:22
80:20 82:15 84:24
87:8, 14 88:11, 12
89:19, 23 91:5, 17
92:2 96:2 97:12, 24
103:19 104:11, 18, 20,
25 105:3, 7, 11, 19, 23
106:6, 11, 15, 20, 25
111:5, 15 112:22
114:23 116:13, 17
119:10 120:24 121:3,
13 122:3, 10, 15
123:16 127:7, 12
131:15 133:25 135:1,
17 136:17, 20 137:9,
16, 20 138:13, 23

140:5, 21 142:4
144:20, 24 145:12
146:2, 5 153:12
155:18 157:24 161:7,
25 164:13 165:2, 24
167:9 168:24 169:18
170:6, 12 171:19
172:4 173:9, 18
174:13, 21 175:7, 20,
24 176:3, 7, 16, 22
181:14 184:17 185:5,
20 186:13, 25 187:10,
19, 22 188:2 192:9
193:25 194:20, 22
195:4 196:4 197:2,
13 198:11, 17 199:7,
11 204:14, 18 205:4
207:5, 18, 25 209:9
210:3, 10 212:9
213:9 214:14 215:20
216:3, 11, 17, 24
219:20 220:3, 14, 19
222:8, 12 223:1
225:21 226:8, 20
227:12 228:6 230:13
233:13, 16 234:25
236:2, 12, 13 237:19
238:4 240:9 241:9
242:22 243:15 244:7,
12, 20, 22 245:2
246:12, 17 249:8, 13
250:11 251:7, 14, 25
252:5, 10 253:10
255:20 256:13, 20, 23
258:15 259:17
260:10 266:21
269:25 270:5, 9
271:19 272:9 274:15
O'Melveny 2:8, 11
8:7
once 58:21
one-day 177:24
one-on-one 46:14
one-page 176:8
one-person 124:20
ones 31:6 37:20
65:1 81:1 116:7, 20
138:7 145:25 146:1,
11 169:12 213:23
217:21 221:15

227:24 240:23
244:10 250:13
268:23
one-time 38:12
61:22 62:2
one-vote 124:21
online 39:14 63:13
85:9
open 54:4 63:6
136:14 265:18 274:3,
10
opening 58:14
operate 15:6
operating 8:24 265:2
opinion 28:18
opportunity 20:21
21:13
option 113:4 157:11
217:23
ORAL 1:11, 16
276:8
orange 218:2
order 17:21 73:11
74:8 81:7 82:7
93:23 95:11 100:18
103:20 104:4 105:5
129:7 130:9 140:22
141:23, 24 152:16
153:12, 15 154:19
159:5 160:11 175:25
183:11 188:11, 15
190:3 191:14 204:3
211:8, 17 260:3
266:25 274:13
organizational 22:6
organize 135:21
origin 78:19 84:5
87:2
original 35:8 56:14
90:8 96:19, 21, 24
97:1 106:8 139:15
144:14 145:22
195:18 205:17
206:23 221:9 226:10
252:6, 11 257:18, 19
260:16 272:2 276:1
originally 56:21
75:23 139:1
originated 19:13
78:11 87:1 252:18

Ouachita 27:16, 20
28:5
outcome 275:23
outline 121:23
252:13
outreach 105:11
outside 14:1 20:4
21:6 23:9 24:15
25:14, 21 28:13
30:20 53:22, 25
62:23 69:13 73:10
129:2 136:3 152:23
168:1 171:9 179:2
180:2 185:24 189:14
190:25 200:21
201:19 203:25
223:19 230:13, 16
246:9 260:1
overall 91:7 106:2
overlay 167:14
overly 124:1
overview 37:14
68:10 69:5, 10
Ozark 29:6
Ozarks 28:7, 10, 15

< P >
p.m 1:20 137:2
220:17 270:13
274:17
P100449 6:8 240:15
PAGE 4:3 89:19
155:20 158:25
159:12 168:17 241:9
244:12 250:6 271:25
277:1
pages 165:6 168:8,
10 187:13 241:16
250:6 275:9 278:1
paired 158:22
pairing 158:19
paper 21:11 201:7
202:22 248:24
parallel 238:25 239:8
part 9:13 27:8
29:18 35:8 38:9
61:17 67:10 68:21
69:24 70:4 76:9
89:16 90:3 94:17
104:6 116:24 121:21

134:13 135:10
150:24 154:8 156:25
164:7 173:12 183:25
184:11 207:10
209:17 221:9 223:14
226:6 234:8 236:18
251:8 252:22 253:8
264:5 272:11
participate 46:14
participating 39:9
participation 40:14
particular 12:17
14:19 15:3 16:24
17:18 18:20, 21 20:2,
17 24:24 26:12, 25
27:7 29:21 35:16
51:1 52:21 66:24
76:17, 18, 24 92:3, 14
95:21 96:5 99:7, 8,
14, 15, 20 100:3, 4, 9,
10, 12, 17, 18 108:14,
20 111:9 112:2
118:1 119:6, 7 123:1
125:4 126:14 130:5,
8, 23 131:6, 7 132:14
136:9 139:5, 14
140:6, 13 142:15
143:13 146:15 147:8,
23 148:2, 25 149:23
150:1 152:24, 25
153:5, 6 154:2, 11, 13,
14, 20 155:10 156:22,
23 164:19 166:4
170:4, 24 177:1
181:16, 23 187:16, 17
189:4 190:2, 18
192:20 196:19 199:3
200:3, 4, 18, 19
201:13, 15 202:5, 18
203:4 211:14 218:17,
22 219:12 227:7
228:12 229:24 234:1,
13 235:10 237:2
240:23 248:2, 3
261:9 265:8
particularly 27:22
37:22 166:19
parties 29:13, 21
49:13 50:20 275:18,
21 276:3, 5

partisan 134:1, 9, 15,
18 192:5 273:3
parts 29:9 77:3
204:5
party 16:16 17:14
23:14, 17, 22 76:14,
18 148:14 151:6
152:21 160:8
Patricia 22:9
Pavel 2:11
Payton 245:8, 10, 22
246:13
PDF 256:4
PDFs 256:7, 9
people 8:18 10:1
26:17 43:3, 21 45:7
76:17 87:24 99:15
110:20 113:23
122:17 123:1 124:2,
17 128:19 145:25
177:6 205:23 209:12
231:13 233:4, 7
percent 125:10, 15
126:24 159:3, 18, 20
160:2
percentage 164:3
percentages 124:8
Perfect 202:7 264:11
perfectly 8:22
perform 17:15 18:11
performance 78:6
84:20 120:10, 25
180:19 186:9
performed 56:3
187:14 223:11
period 70:22 71:1,
20 171:25 188:25
235:22
permission 55:16
person 18:24 27:5
40:2 41:15, 25 43:12
90:12 96:25 115:9
124:17 152:14, 22
153:2, 4 163:4
170:16 177:15, 16
185:18 187:25 193:2,
11, 18, 19, 22 194:1
196:9 203:2 205:1
211:6, 17 213:21, 23
215:2 223:15, 16

224:2 226:3 245:17
258:23, 25 260:1
271:18
personal 23:15, 17
33:2, 3 45:17 60:15
70:11, 12, 15, 24 71:5
72:20 101:20 125:24
126:4, 8 131:9
227:21 256:5, 6
258:8
personally 182:25
persons 125:18
153:4 242:12 276:6
person's 194:4
perspective 142:14
phone 31:19 43:15
70:19, 21, 24 71:5, 7,
8 193:8, 12 194:2, 16
203:9 204:23 205:2
209:24 213:21, 24
215:8 260:4, 6, 7
262:6 267:22, 23, 24
phones 71:11
phrased 218:24
physical 27:10, 14
28:5
pick 223:16
piece 55:11, 13
77:17 86:20 107:18
108:19 189:1, 4
201:15 202:5, 22
244:20 248:3, 23
253:13 261:9
pieces 55:12 67:9
139:6 154:20 253:21
258:13, 19 269:7, 15
place 25:3 60:13
61:24 90:6, 19 91:2
126:7 189:18 261:17
places 155:3
plain 107:13
plainly 150:20
PLAINTIFF 1:17
22:6 23:23 276:13
PLAINTIFFS 1:4
2:2 7:9 8:8, 10
22:20 151:25
plan 228:24
plans 267:5
platforms 32:13 33:1

please 7:13, 19 9:8,
9 10:15 106:21
137:7 145:13 154:17
194:23 220:15, 19
plotter 254:5, 11, 12,
15, 22 255:7, 11, 13,
16
plotting 253:8
Plugging 195:1
plus 206:11
point 21:21 36:17
37:23 42:3, 21 45:25
48:22 57:12 60:18
74:24 85:4 87:22
88:1 89:18 90:21
93:15 97:9 103:7
122:8 133:24 140:11
141:17 143:18
148:10 171:11, 13
178:2 181:10 194:6,
24 204:2 213:21, 25
217:23 221:13, 17
222:20 223:6, 13
229:15, 21 234:6, 11
239:17 246:6 253:2
254:2 255:18 260:5
263:1 267:4
points 42:22 45:9
48:21 72:19 79:18
121:15 200:2 201:21
207:6, 14 212:3
214:8 216:12
policies 54:20, 23
policy 16:12, 19, 21,
24 56:5 69:4, 12
101:22 102:9 127:11,
15 129:22
political 26:10, 12, 19,
20 29:11, 13, 21 76:9,
12, 14 77:1, 2, 7, 9, 12
78:4, 6, 12 84:20
103:24 120:10, 17, 25
158:9, 14 170:7
180:18 181:5 186:9
190:19 191:12 192:1
266:24
populated 124:1
population 64:19
65:25 66:3, 10 75:14
76:1, 6 88:18, 20

91:7, 21, 25 92:24, 25
100:9 103:10, 11
105:25 106:2, 10
113:2 121:8 122:15,
17, 21 123:4, 5, 17, 19,
20 124:16 125:4, 18
159:2, 6, 15, 16
161:22 164:4, 5, 20
167:13 168:2 170:24
173:13 175:8 180:24
186:1 190:19 193:10
194:5 196:16 199:11
200:2, 16 203:25
233:6, 10 242:8, 16
246:10 266:23
populations 75:16
92:22 93:7, 22
100:11 124:10
126:13 233:4
portion 90:4 165:12
235:11 263:25
portions 235:19
posed 77:19 82:16
148:23 151:22
192:23
position 32:25 84:25
109:23 110:12 139:9
149:2 150:4, 10, 14
152:5 153:7 188:19
203:18 228:8 274:4,
8
possible 8:18 57:25
125:19 127:9 200:1
207:3 211:15
possibly 56:25
post 32:10 33:1
48:2 63:8
post-2020 48:2 68:2
potential 261:7
potentially 12:16
68:2 80:23 86:15
165:16 172:23
195:20 215:22 229:4
248:12 264:1 268:8
PowerPoint 38:10, 12,
22 62:10, 12 63:4
68:5, 7 98:14 159:24
PowerPoints 13:9
practical 16:22
110:14

practice 44:6, 21
45:14 56:22, 23 90:3
91:20 119:5 211:25
practicing 30:8
44:15, 25 46:9 89:25
91:11
precinct 66:19 75:16
76:14, 16, 24 78:1
83:15 84:9, 11, 14
88:25 89:2, 3, 4 93:8
158:18 189:24 192:2
202:9 203:16 204:4,
11 218:2, 3, 6, 13, 16
219:17 233:7 244:13,
23 264:1, 6
precincts 6:17 81:21
92:14, 17 96:16
100:4 104:3, 6
116:10 158:16
181:22 200:19
202:13, 18 204:7
215:15 218:10, 19, 22
219:13, 16 235:16
263:15 264:10, 13, 15,
21 265:9, 15
predicate 200:25
predrafts 134:24
preference 91:2
preferential 17:14
preferred 276:7
preliminary 252:20
preparation 14:2, 5
34:1 37:2, 7 43:24
58:9 60:24 190:24
224:23 234:19
250:18, 25
prepare 12:13 13:1
14:9 20:9 39:6 42:7,
9 56:12 65:5 99:1
105:9 174:20, 22
175:1 188:11 211:9
225:10 251:2 270:20
prepared 80:5
225:17, 21 226:5
230:23 231:2 237:9,
14 238:13, 25 240:3
243:20 254:9 276:12
preparing 36:24, 25
79:12 80:18 102:12
179:9 188:8 224:19,

25 234:16, 22 236:2
239:12 250:14 251:4
270:16, 21
present 16:21 41:5
52:10 57:9 126:11
129:5 217:14 227:5,
7, 9
presentation 38:10,
13 62:13, 15, 23
68:23 69:13 70:7, 8
126:17, 23 133:20
134:13, 25 159:24
254:8
presentations 62:24
63:2
presented 34:8, 11,
12 68:5, 12, 24 134:7,
20, 21 243:20
presenting 68:25
preservation 158:8,
13 199:22
preserve 59:2
preserved 175:21
presidential 76:23, 25
presnapshot 44:20
pretty 110:9
previous 13:4, 8, 9,
11, 17 20:5 21:4, 6
33:19 35:22 57:4
64:24
previously 15:12, 13
20:10 36:14 37:19
96:6 217:21
primarily 13:10
26:16, 20 27:9 29:6
38:24 47:7 49:2
52:6 62:17 255:17
primary 10:1 19:17
27:3 40:16
principle 131:21
principles 133:22
173:24 174:6 209:6
print 51:14 254:21
printed 37:24 46:7
51:13 60:14 75:21,
23 159:13 256:5
printer 46:8 256:5
printing 235:18
prior 13:14 33:24
47:15 57:7, 19, 21

58:7, 13, 17 267:5
269:3 275:6
priorities 124:23
125:1
privacy 226:1
private 249:10
privilege 82:12, 19,
25 98:12 99:4
107:10, 21 108:18
110:25 112:9 118:9,
12 126:19 128:24
129:13 131:2, 13
133:14, 16 142:20
145:20 147:20 148:4,
6, 22 149:20 150:17,
20, 22 151:6, 9, 18
152:2 154:7 155:6
162:5 165:19 179:16
180:16 181:18
182:14 183:7 186:15
188:18, 22 190:6, 22
192:24 193:7 201:12
202:4 217:12 242:20
261:15 262:16 263:4
265:1 266:9 267:11
270:4 271:5, 23
273:25 274:5
privileged 94:2
103:4 109:24 110:12
125:22, 25 200:10
201:17 272:17
privy 148:5
pro 65:4 164:24
173:14
probably 31:12, 15
32:21 33:25 47:17
61:2 154:22 184:6
problems 91:24
167:1
Procedure 1:24
275:16
Procedures 136:5
proceed 43:11
proceeding 275:19
PROCEEDINGS 7:1
274:17 275:10
process 34:23 35:14
37:9, 14 38:7, 11
40:14 45:6 47:16
51:9 57:16 61:17

64:10 69:10 82:18
87:14, 17, 19 90:18,
22 96:2, 23 97:15
103:7 104:23 109:2
128:19 129:10 133:4
135:22 137:6 140:9
141:22 143:24
144:18 148:11
155:11 156:10 157:5
159:8 166:21 173:15
177:5 199:4 201:2, 8,
22 203:5, 22 211:5
229:20 235:14
239:20 253:23 263:9
269:21
processes 130:16
148:10 204:23
processing 35:11
procurement 74:20
produce 96:15
115:24 144:20, 24
241:20 249:23
produced 1:16 64:5
110:3 158:20 165:13
169:14 196:21
197:16 207:17
240:24 242:2 250:13
271:4
producing 46:6
157:3 163:9, 12
164:21 168:1, 3
173:18 175:7 178:10,
13 186:4, 8 188:2
196:15 204:15 207:5
212:3 214:8
product 45:18
108:20 175:21
256:13
production 240:19
professional 23:2, 15,
18 24:4 32:16
241:12
professionally 23:25
professor 26:22
profile 32:19 251:3, 4
program 35:11, 16
43:10 46:16 74:12,
21, 22 77:5 93:13, 17
100:24 102:17

103:20, 24 148:12
261:18
programs 34:18
progressed 257:25
project 179:1
projects 146:10
proper 148:12
proposal 153:7
proposals 239:13
propose 16:23
proposed 49:6 97:15
138:11, 20 139:18, 23
140:3 148:3 157:20
158:5 173:15 176:11
195:9 205:9 206:23
212:17 214:18
225:14, 17 227:3
229:10, 24 235:6
241:4 243:10 244:4
248:8, 10 249:25
251:22 256:10, 21
269:18
proposing 237:24
238:7 239:7
propounded 278:1
protect 128:20 129:8
protected 131:2, 12
188:21
provide 10:7 12:24
14:25 16:6, 10 17:6,
8, 18, 25 18:17 19:4
35:2 56:2, 6 69:9
80:5 98:22, 24
118:21 119:6 120:9
126:11 129:1 157:10,
12, 13 217:6, 19
218:18 247:5, 8, 16,
18 249:7 276:2
provided 17:24
37:12 59:1 89:17
97:21 109:9 118:22,
24 119:7 127:1
148:9 156:12, 13, 14
157:8, 15 159:13
163:17, 18 179:4
188:24 189:3 190:10
191:24 201:2, 21
207:8 208:10, 11
218:9 232:23 238:9,

11 241:24 242:17
244:23 261:11
provider 276:8
provides 27:18
providing 24:5
105:11 120:20
164:17 169:22 170:4
216:12 218:16 239:4
240:2 246:8 248:8
provisions 124:22
public 19:5 54:12
63:7 71:16, 25
135:21, 25 136:2, 11,
14 147:22 192:16
226:6
Pulaski 26:1 91:12,
19 92:14, 17 263:25
264:2, 14
pull 96:6 97:7
153:21 172:3
pulled 63:9 64:5
88:15 97:4 197:19
231:7 248:18
pulling 232:12
264:20
purely 63:20
purple 244:19
purporting 242:3
purpose 60:2 145:19
151:24 154:6
purposes 38:3, 5
42:4 63:4 133:13
199:22
pursuant 1:23
pursue 26:21
purview 127:10
130:16
push 34:21
put 64:2 72:24 78:1
95:19 99:14 108:24
137:18 154:24
181:13 189:20 193:9
200:4 202:24 203:16
204:10 254:20 255:4,
15
putting 7:20 94:17
152:24 202:24
229:20

< Q >

question 9:13, 14, 21,
22, 23 10:3, 18, 19
12:6 16:20, 22 17:17
18:12, 14 41:7 46:14
47:9 77:14, 19 82:22
83:6 95:2 103:3
108:17 111:5 115:6
126:2, 24 129:22
130:13 134:8, 11
141:5, 17 144:3, 5
148:23 149:11, 14, 15
151:22 152:9 162:4
166:11 175:20
179:22, 24, 25 181:9
183:7 192:23 193:10
194:4, 9 200:25
201:5, 6, 24 204:5
218:25 220:4 223:23
226:2, 25 236:19
261:6, 11 264:18, 23
269:5
questioned 229:2
questioning 149:9
questions 9:2, 9, 16
10:5, 12 42:23 47:3
82:16 87:2 134:7
137:7 145:17 154:12
166:14 188:24 229:1
253:20, 22 272:5, 10
273:14 274:5 278:1
quickly 57:5, 25
131:16
quote 170:25 171:1

< R >
race 81:11 83:2
84:14 266:24
racial 20:22 23:6
24:1, 9, 11 27:7
29:20 64:20 66:14,
21, 25 67:1, 23, 25
76:6 82:3, 7 83:19
84:2, 10, 24 92:3, 25
100:11 116:14, 18, 23
117:18, 25 118:20, 24
119:11, 14, 24 120:2,
4 132:6, 13, 15, 24, 25
134:19 163:12, 16
164:21 168:19
169:14 170:25

173:19 178:10 180:9
186:4 188:2 190:20
192:5 196:23 197:18
204:15 207:5 212:3
214:8 216:12 224:14,
19, 22, 25 225:13, 22
226:4 230:23 231:7
232:13, 18, 20 234:22
236:3 237:9, 14, 23
238:5 239:23 241:23
242:7, 15, 16 243:21
racked 92:10
raise 93:18, 21 94:6
raised 41:8
raising 23:6
ran 102:16 115:22
116:5, 7, 19 117:25
164:8
range 27:16 28:6, 7
247:15, 21 249:9
251:13
ranges 27:15 251:18
ranked 227:2, 14, 24,
25
ranking 228:2
Rapert 170:25 267:8,
15, 25 268:21
rationales 148:1
Ray 184:24 185:3,
18, 21 186:1, 5
Rd 276:21
reach 88:25 177:6
reached 47:3 195:21
reaching 29:3
read 13:6, 10 20:21
21:1, 11 37:11, 12, 14,
22, 24 60:13 68:13
114:21 130:1 132:8
273:19 278:1
reading 38:2 60:7,
16 131:19 275:15
reads 106:20
ready 56:17 57:11
real 271:24
reality 110:14
realize 22:7
realized 75:23
really 37:7, 8 46:3
88:21 128:8 178:1
232:25

realtime 2:11 275:11
276:21
real-time 93:3
reask 95:2 144:6, 7
269:4
reason 10:11 27:3
83:20, 25 112:5
150:9 167:16 194:10
245:16 273:25
reasons 125:17
126:12 147:17 150:3,
7, 14, 18 268:6
rebalance 124:16
125:17
rebalanced 123:21
rebalancing 93:22
126:13 266:23
recall 21:18, 20, 22
22:10, 12, 14 29:14,
18, 19, 25 32:9, 11, 15
37:20, 21, 25 38:19,
20 39:20, 22, 25 40:3,
6 42:15 46:17 47:9,
25 48:6, 13 50:16, 19
52:8 58:16 59:5, 7,
18, 22, 25 60:17, 20,
22 61:3 62:23 63:6
64:11, 12 65:3 66:16,
18 68:25 71:17
72:14, 20 73:1, 7, 9,
10, 14, 15 75:14
76:10 79:21, 22, 24
80:11 81:1, 9, 14, 24
82:1, 3 88:17 89:18
90:16, 17 91:8, 17, 25
92:2 93:9 102:14, 15,
18 103:6, 8, 14, 20
104:8, 20 106:7
109:17, 19 111:17, 18
112:1 113:6, 9, 18, 19
115:17, 19, 20, 23
116:2, 20, 21, 23
117:5, 9, 10, 14, 15, 17
119:13, 17 120:24
121:10 122:20
127:19 134:13, 24
138:13, 24 140:10
143:4 145:1, 2, 21, 25
146:5, 8, 13 153:13
154:23 155:2, 7, 9

156:4, 7, 11 157:24
158:2, 3, 11 160:19,
22 161:9, 13, 25
162:22, 24 163:1, 3, 5,
8, 9, 11, 12, 14 164:20
165:24 166:2, 4, 23,
25 167:9, 23, 25
168:1, 2, 4, 16, 24
169:11, 21, 22 170:2,
3, 6, 9, 14, 20, 21
171:14, 16, 19, 24
172:2, 10, 12, 16, 18
173:9, 11, 18, 21
174:19, 21 175:4, 6, 7,
16, 17, 19 176:3, 6, 14,
20, 25 177:8, 13, 17,
19, 23, 25 178:2, 6, 9,
10, 13, 16, 19 182:1, 3,
4, 7, 10, 16, 18 184:17,
23 185:2, 4, 23 186:3,
4, 8, 22 187:5, 10
188:2, 10, 13, 14
192:9, 14, 15, 18
193:24 194:4, 15
195:8, 11, 25 196:7,
12, 14, 15 197:4, 6, 9,
14 198:23 199:11
204:15, 18, 22 205:7,
11, 20 206:1, 10, 24
207:5, 8, 16, 23 208:2,
9, 15, 20, 21, 23 209:2,
9 210:1, 13, 16 211:1,
4, 9, 13 212:3, 6, 16,
19 213:3, 7, 14, 17, 20,
23 214:5, 8, 11, 21, 23
215:1, 4, 24 216:3, 4,
8, 22 218:12, 20, 21
220:9 223:1, 3, 18
224:1, 6, 10, 14, 19, 22
225:5 226:7 227:8
229:12, 14, 18 230:1,
17, 20 231:2, 7, 13
232:8, 12, 15, 20
233:6, 8, 9, 11, 12, 21,
23 234:3, 5, 6, 12, 14,
18, 21, 22 235:10, 19
236:2, 4, 10 237:14
238:8, 9, 12 239:14,
18, 19, 21 241:4, 6
243:13, 23 245:9, 11,

12, 19, 21, 25 246:2, 4,
6, 8, 11, 12, 15, 18
247:6 248:20 249:20
250:1, 2, 16, 17, 23, 24
251:2, 3, 6 252:10, 12
253:2, 13, 18 256:15,
19 257:11, 15 260:5
265:21 267:22, 24
268:1, 2
recalling 196:21
receive 30:6 42:12
63:20 65:11 71:3
86:6 94:5 97:17, 18
180:6, 9, 18, 24 181:3,
14, 21 185:17, 25
189:14, 19 190:3
202:17 204:9 210:22
247:9 271:1
received 13:15 48:6,
13 59:5 65:9 79:2
87:3 95:14 101:16
154:19 162:10
177:14 181:12
185:21 187:22
189:10, 17, 23 191:1
193:8 199:19 202:19
203:3, 7, 9, 23 204:2
215:14 226:13
receiving 47:4 48:3
59:7 86:1, 24 94:16
177:17 188:10, 14
199:11 202:8 211:1
240:11 245:18 260:2
Recess 74:2 137:2
220:17 270:13
recognize 89:14, 15,
16 104:18 114:11
131:20 135:5 137:14
165:21 172:9, 10
174:18, 19 195:6
198:21, 22 210:8
212:14 220:25 221:2,
3 230:8, 9 233:19
235:4 244:7 245:6
recollection 116:1
140:7 144:22 156:15
166:13 195:10 211:7
216:5, 11 221:17
230:15 238:23
245:18

recommendation
69:12
reconfigure 92:11
record 7:13, 18, 21
71:12 109:21 110:2
111:19 112:11 121:7
139:3, 11 142:19
143:6 145:16 155:14
173:1 174:4 183:19
186:18 193:25 226:6
228:6 262:6 266:7
267:16, 23 273:22
274:1, 14, 16
recorded 37:20
39:17 46:2 143:7
173:2
recording 39:17, 19
93:16
recordings 41:23
262:3
records 60:9, 10
141:1 172:20 174:22
233:14
recreate 94:22
recreated 89:25
Rector 2:4
Red 37:13 68:9, 14,
22 158:25 160:1
redistrict 60:11
redistricting 11:19,
23 12:3 13:5, 19
14:22 20:7, 20 21:23
31:2 32:12 33:4, 5, 9,
17, 19, 21 34:17, 25
36:5, 20, 22 37:9, 11,
14, 16, 18 38:11 39:6
41:1, 14, 24 42:5, 14,
18, 24 43:4 47:13, 15,
18, 24 48:3 50:21
54:21 58:3 59:3
60:10, 11 61:1, 9
62:8 63:1 64:14
68:10 69:2, 15 70:6,
9, 17 71:4 72:3, 16,
17 73:12 75:3 80:6,
22 85:6, 10, 12, 16, 25
86:3, 12, 15 87:9
97:25 98:4, 9, 18
101:23 102:7 107:16
124:19, 24 128:8

129:24 131:5, 23
132:1, 21 133:5, 10,
21 134:5, 11 135:11,
14, 19, 24 137:24
155:24 156:10
157:18 160:3 173:24
174:6, 8 183:11
241:12 262:13, 19
268:15, 24 269:19
271:2
redraw 81:8 90:21
93:23 108:5
redrawing 104:22
105:21 107:8
redrawn 106:17
reduce 130:19
refer 15:19 123:11
222:6
reference 238:14
referenced 68:14
167:12 168:25
references 212:23
referencing 160:14
169:3 239:3
referred 52:4 68:14
referring 13:12, 21
14:15 44:7 55:23
63:10 105:16 114:4
116:11 163:25
178:21 214:3 235:23
reflect 92:18 186:18
243:10 257:9 274:1
reflected 108:1
110:18 140:18
reflecting 219:17
reflects 110:2 149:18
151:11 252:1
refrain 9:9
regard 61:9
regarding 64:13
81:11 127:15 269:15
regardless 16:16
273:3
region 29:6
regions 28:12, 17
regular 53:5
regularly 160:2, 25
Regulations 276:15
reiterate 149:13

related 14:13 16:18
20:6 21:23 23:6
24:16, 18 26:14
41:23 62:7, 25 70:6
71:4 77:16 80:6
82:12 85:21 86:19
126:9, 16 173:5
185:7 196:11 202:12
222:11 233:1 275:17
relates 41:6
relating 47:23
relation 207:6
230:24 232:10
237:10 239:4, 8
241:24 243:22 251:5
268:3
relationship 74:17
187:11
relative 275:20
relatively 101:11
relevant 80:3
relied 153:2
relinquish 275:25
reloading 90:14
remain 254:14
remains 17:3 18:24
remember 32:11
39:9, 13, 16, 18, 22
40:2 42:21 46:1, 2
48:25 50:14 59:6
66:19 67:3, 4 88:22
91:9 92:5, 10, 12
97:7 102:19 103:17,
18 114:13 116:4, 6,
17 117:3 123:10, 12
124:3, 4, 6, 8 126:23
128:18 129:7, 22
133:22 134:19 135:9,
10 138:6, 9, 17
140:14 145:23
146:11 156:3 159:22
171:11, 12 172:1
187:15 188:1 195:13,
14, 15, 20, 23 196:18
198:11 215:5, 21
221:20, 25 222:19, 23
223:9 224:25 225:6,
19 227:23, 25 231:4,
22, 23 232:22 233:1
235:17 236:8 243:16

245:7, 23 247:22
249:4 250:4 252:18,
25 253:8 265:19
267:13, 14
removed 54:5 155:16
repeat 9:13
rephrase 9:15 62:9
154:17 179:25
replicated 251:3
replicating 86:24
Report 44:18 64:23
65:1, 12, 23 66:17, 22
67:3, 21 96:15, 19
104:2, 9 115:12, 24
116:4, 7, 9, 21, 22
117:3, 5, 13, 16, 25
118:3 119:6, 11, 14,
17, 25 120:25 156:12,
13 157:14 164:7
168:11 169:20 170:4
231:22 232:1 233:13
reported 1:21 174:7
196:16 246:10
275:11
Reporter 4:6 9:6
10:3, 6 194:22
274:15 275:1, 2
276:14
reporting 19:9
169:21 276:21
reports 47:4 64:12,
16, 19, 20, 21 65:4, 10,
20, 21, 23 66:14
67:18, 19 68:3 114:3,
18 115:7, 19, 21
116:2, 5, 17, 19, 23
117:18 118:19 120:9,
12 157:24 168:3, 13,
24 169:3, 10, 12
173:14 175:8 178:13
196:15, 20, 23 216:14
232:22 241:18, 21
represent 7:25 8:5
16:15 59:13, 14 64:4
110:8 213:1 241:3
249:16, 24
representation 24:5
76:21 77:1 183:22
219:9 232:24 233:3
264:9

representations 5:21
34:15 184:8 187:1,
20 195:4 198:18
205:5 207:19 210:4
212:10 216:19
220:20 273:6
Representative
138:11, 14 142:19
145:7 146:3, 6 147:8
148:15 149:3, 4
150:4 153:8, 9
165:17, 25 166:9
167:20, 24 176:23
177:3, 9 178:7, 20
179:5, 7, 13 180:6, 10,
19, 25 181:3, 4, 15
182:17 184:24 185:3,
18, 21 186:1, 5
188:11 195:9, 12, 13,
16, 21 196:1, 24
197:8 198:7, 9 200:1
210:11, 14, 23 211:2
212:7 213:18 214:18,
24 215:16, 17, 22
216:6, 13 220:10
221:4, 5 222:23
223:5, 7, 8, 18 224:2,
6, 11, 15, 20, 21 225:2,
9, 14, 18, 23 226:11
227:13 230:10, 11, 13,
16, 24 231:6, 9
232:11, 14 233:21, 24
234:4, 7, 15, 16, 19, 23
236:6 237:1, 11
238:15 239:5, 6, 7, 16
241:4, 5, 7 243:11, 21
244:4, 10, 25 245:8,
10, 22 246:13 248:15,
19 251:23 258:23
259:1, 3, 7, 12, 13, 16
260:18 261:1 262:2
265:5 266:7 268:2,
19 269:4, 13, 17, 20
representatives
211:16
represented 10:24
87:25 242:14
representing 24:14
189:9
reproduce 86:14

Republican 72:3
272:22 273:8
request 12:19 17:13,
19, 22, 23 18:1 19:2,
6, 10 50:4, 23 51:2, 5
52:18 55:2, 6, 8, 25
56:3, 13 57:25 59:24
61:4 62:3, 5 63:5
64:17 65:7, 13 78:18
81:9 84:18 86:20
99:10 101:17 102:25
107:4 116:6, 20
117:19 120:1 122:1
141:15 163:22 166:9
169:15 171:14, 16, 20
182:24 197:4, 18
207:13 213:21 215:8
217:9, 24 219:25
225:24, 25 226:14
228:21 231:8, 18, 21,
22 232:4 236:4, 8
237:20, 21 244:24
245:19 248:14, 16
249:5 250:5 252:19
254:9 259:15 276:12
requested 17:6, 7
19:25 51:15 52:24
66:13 80:7 81:3
112:19 116:5 117:6,
11 118:20 143:7
164:16, 23 170:4
196:24 213:6 217:18
226:3 231:13 232:16
248:21 275:15
requester 145:5, 6
requesting 238:5
239:23
requests 16:18 17:15
53:10 54:19 55:22
58:23 82:13 95:25
98:2 170:24 171:8,
13 228:24 231:24
241:7
require 132:24
required 57:14
108:6 127:4 131:7
136:3
requirement 100:19
131:22 132:14

requirements 19:9
133:2, 9, 21 265:23
requires 275:25
276:2
RESEARCH 3:2
7:25 15:17, 19 16:3,
4, 5, 14, 18, 20 18:2
19:4, 8, 16 37:8 38:2,
5 41:7 43:5 56:4
63:11, 23 70:1 126:8
184:22, 25 254:16
255:12
researched 37:11
103:5
resolved 273:24
resource 16:13 70:4
85:18
resources 27:24
respect 107:18 111:2
148:25 151:15 156:9
162:1 165:11 166:14
167:19 176:4 189:3
190:2, 24 192:19
193:15 201:14 202:5
204:14 211:20
218:17 229:24 236:3
237:8, 21 238:4
259:8 261:8 262:9
269:6
respecting 127:12
respective 269:1
respond 9:18 55:25
197:18 228:18, 20
responded 95:13
responding 58:23
63:4 197:4 231:18
response 10:7 59:23
62:5 182:23 269:2
responses 151:17
194:11
responsibilities 42:13,
25
responsibility 17:19
19:17 33:11 38:6
40:17 174:3
responsible 34:7
36:11 42:16 71:19
responsive 56:1
268:17

rest 229:6
restating 118:16
restroom 73:23
result 86:1 142:11
results 44:14 45:22
48:4, 7, 12, 17
resumed 57:4
retained 202:23
retainer 11:11
returning 20:14
reveal 139:4 193:2
206:17 219:1 226:17
260:21 261:12
272:11, 17
revealing 217:9
266:11
reveals 227:19
review 16:7 20:1
36:12 105:9 106:21
177:20 247:20
reviewed 13:10 20:5
38:24 39:1, 12, 14
134:17 152:22
reviewing 61:19
Revised 4:15 104:14
Richard 72:13
Ridge 27:18
right 12:11 108:3
168:7 183:23 184:2
229:7 237:13 243:24
256:12 268:4
right-hand 168:18
240:17 241:11 242:6
256:24
rights 24:19
rights-related 47:20
ring 26:15
River 28:3
rivers 27:11
RMR 1:21 276:20
Rock 1:23 2:23 3:5
25:11 26:1 30:5
role 23:19 33:9
34:2 54:9, 12 98:3
104:25 107:17
108:12 109:1 270:16
roll 136:22 268:7
room 7:17 8:19
50:5 51:24 52:5, 9,
15, 17, 21 53:2, 13, 22,

25 60:8 71:9 86:8
88:3 99:16 110:16
111:21, 23 112:3, 13
140:18 146:18, 25
161:5 162:24 167:4
177:11 178:6 185:6,
20 187:21 193:16
196:5 199:9 206:8
208:7 209:22 210:21
213:16, 19 223:12
224:7 253:6, 9, 14, 17
254:5, 17 255:7, 10,
11, 12, 15, 18 256:4
259:7 260:8 261:3
267:17, 20
rooms 41:21 255:10
round 129:16 166:13
routed 47:8
row 115:15 116:13,
14 117:1, 7, 12
128:20 129:8, 9
rule 127:3 130:7, 21
Rules 1:23 8:24
36:12 54:15, 18
55:21, 24 56:5
275:16
run 65:1, 23 67:18,
21, 22 101:5 102:11
104:5 115:7 117:16
119:23, 25 216:14
running 56:23 57:1
100:25 102:18 116:2,
17 117:3, 17 157:24
158:3 182:1

< S >
S44 249:24
Salt 37:16
San 2:9
sandstone 28:25
Sarah 3:3 8:1
sat 46:3
satisfies 157:21
satisfy 100:19
save 51:1 111:22, 24
112:3, 6 143:11
172:22 254:21
257:13, 15, 16
saved 53:19, 20, 21
112:11 143:15, 17, 20

146:20 147:7 153:22,
24 155:9, 15 162:18
163:22 191:2 201:8
253:15, 16 256:4
261:19
saving 257:13
saw 92:12 168:11
221:21 229:18
257:24
saying 67:17 132:17
141:9 249:9
says 89:11 107:22
114:16 115:16
157:18, 19 159:2, 17
222:4 235:21 241:11
256:24
SB 162:1, 9 163:13
164:18 172:13
204:14 207:23
214:24 236:9
SB28 209:2
SB720 161:8, 11, 15,
18 162:6, 7, 14, 15, 19
163:2, 6, 10 164:19
SB721 5:2 172:5
173:10, 19, 25 174:9
SB722 5:2 174:14
175:5
SB723 5:5 175:12,
16 176:1, 4
SB724 5:5
SB725 5:9 187:1, 5,
20 188:3, 8, 12, 15
189:6, 11, 16 190:4,
25 192:11 193:19
SB726 5:12 198:18,
25 199:13, 16, 20
200:22 204:14, 20
SB727 5:12 205:5, 7,
9, 12, 17 206:2, 22
207:6
SB728 5:15 207:23,
25 208:3, 10, 16, 19,
25 209:6, 10, 15, 25
SB729 5:18 212:10,
20, 24 213:4 214:6,
12
SB741 6:2 229:10
230:1

SB742 6:5 234:25
235:6 236:3
SB743 253:11 263:6
267:3
SB744 249:17 250:7
251:5
scheduled 57:8
scheme 90:17 240:25
school 26:23 30:5,
22 47:17, 19 113:11
science 26:10, 13, 19,
20 29:11
scratch 95:9 162:2
182:10
screen 51:14 52:12
80:12 88:3, 14, 16, 17,
23, 24 91:5, 10 92:4,
7, 19 93:1, 3 94:18
95:6, 19 103:10
121:4, 9, 11, 14, 25
122:11 161:22
167:10 209:3 265:14
screenshot 51:14
114:19
Scrivener 93:15
148:11 265:2
seal 276:16
search 60:25
searchable 31:21
searching 61:2, 3
Sebastian 218:14
219:6, 7
second 23:13 89:12
105:24 114:12
150:24, 25 179:22
228:1
Secretary 1:7 2:20
8:13
section 136:18
157:17 276:15
sections 90:2, 10
217:7
see 31:19 45:1
68:15 91:22 106:23
112:25 115:19
116:15 120:9, 13
121:24 122:12 125:8
135:15 138:10, 12
146:2 157:22 158:24
165:24 168:22

169:19 172:12
176:22 187:7 203:9
212:16 214:18 219:5,
10 229:9 241:13
242:14 256:11 257:2
264:4, 9
seeing 46:2 88:15
95:4 115:17 168:15
170:2 272:1
seeking 128:19
184:22 261:6
seen 155:25 240:23
263:20, 22
selected 88:19 90:4
Selig 3:4
seminar 37:16
Senate 11:23 34:12
38:16 40:22, 25 41:4,
13 79:23 80:8, 9, 23,
24 160:19, 20 170:13
172:5, 13 176:9
205:21 207:19
212:16 213:10
226:21 229:12
249:24 251:17
256:20, 24 257:19
258:4 259:17, 18, 22
262:9, 11, 18, 21
263:6 265:24 267:9,
16, 25 268:3, 14, 21
269:14
Senator 160:24
161:4, 8 162:10
163:21 166:14
170:24 172:14, 16
173:4, 10 174:10
175:1, 4, 12, 18, 24
176:11 187:8, 11, 23
188:11 189:10, 15
191:2 193:8, 16, 20
198:25 199:4, 5, 7
201:15 204:25 205:9,
12, 14, 21 206:5, 11,
15 207:1, 9, 11, 12, 25
208:2, 5, 10 209:7, 10,
20 210:1 212:17, 19,
22, 23, 25 213:4, 6, 11,
18 214:6, 9, 12
215:15 229:10 235:7
237:15, 20, 22, 24

238:6, 14, 24, 25
239:4, 9, 15 240:5
248:20 249:25 250:1,
16, 23 256:21 259:19,
22 265:4, 5 266:8
267:8, 15, 25 268:20
senator's 147:9
send 51:4, 7 97:8
106:3 111:18 115:8,
10 252:19
sending 248:11
sense 46:3 69:6
88:13 99:18 190:17
211:24 233:20
241:17 249:22
sent 59:3 104:22
107:1, 19 109:10, 16
110:6, 10 115:7
208:13, 23 212:1
271:6
separate 28:4 33:7
68:3 70:3 136:2
164:19 206:25
222:16 251:8, 12, 16,
17 256:18 258:13, 16,
19 268:22
separately 63:9
120:21 232:2 237:14
September 227:1
series 174:14
seriously 38:7
serve 40:20
served 177:7
service 56:7 276:3
services 16:6, 11
18:17
serving 18:7 40:17
session 33:24 37:1, 4
41:16, 17, 18, 20, 21
42:2 57:3, 4, 20, 21
58:2, 4, 7, 10, 13, 17,
21, 24 135:25 171:23
208:21 213:22
221:17
sessions 46:15
set 71:9 89:20
112:24 124:13 132:5
138:9 172:11 222:9
251:16 252:1

setting 255:21
setup 120:15
shady 221:18
shaking 9:10
shape 101:11 264:5
share 17:20, 23
44:24 45:10, 16 51:3
55:15 59:19 65:15,
16, 17 70:16 77:15
82:10 85:21 86:18
94:1 95:22 103:3
125:22 126:15 131:2,
12 133:15 166:8
171:7 225:23 231:16
shared 45:1 54:24
55:1 78:25 84:3
86:4 105:13 179:12
197:6, 10, 15 198:8
201:14 223:19
231:16 249:1
sharing 248:11
sheet 42:16, 19
53:12, 15 156:7
201:7 278:1
Shelby 39:7 47:7
113:22
shorthand 1:22
short-term 254:10
show 54:8 89:11
104:11 113:20 114:1
131:15 218:1, 6
272:2
showed 42:16 91:24
showing 45:5 187:14
shown 158:24
202:22 241:16
shows 158:15, 25
shut 269:24
sic 118:23 209:2
237:22 238:25
side 91:4 136:23
193:11 235:22
sides 200:7 258:5
sign 273:20
signature 276:11
278:1
signed 11:10
significant 124:1, 5
128:1, 6, 10 130:2

sign-in 53:12, 14
signing 275:15
similar 28:9, 17
32:23 114:20 132:12
165:4 166:13 169:20
175:20 238:18
250:11 251:10
similarities 28:14
similarly 92:13
100:2 117:7
simple 192:22 193:6
simpler 91:3
simply 16:13 17:14
53:6 69:9 90:25
130:17 142:10 147:3
166:12 192:1, 8
219:1
simultaneous 252:14
single 23:21 160:16
189:18 190:1
sit 103:19 138:19
140:5 147:16, 24
149:22 150:10 153:4
155:4 174:9 237:2
site 86:2
situation 61:7 180:1
situations 50:10
six 165:5 168:10
six-page 168:6
size 256:7
skin 95:23
Skocpol 2:15 8:14
slightly 257:14
small 89:1
smaller 254:24
smallest 81:19
Smith 22:17
snapshots 241:10, 19
242:3 250:8, 12
social 31:4 32:12
128:1
software 44:6, 7, 12
45:21 46:5, 12, 21
51:22 54:1 65:22
66:6 74:5, 8, 15 85:6
92:8 102:17 103:6,
15 168:12 185:25
197:24 208:24
264:20
sole 70:7 137:23

solely 33:1, 3 74:8
94:5 98:1 130:16
133:13 145:18
151:24 154:6 202:11,
12
somewhat 123:19
sorry 22:16 25:23
28:16 73:23 119:21
160:8 162:15 186:12,
20 214:25 230:15, 21
236:17 238:22
sort 60:15 82:14
201:1
sought 11:15, 18
sound 221:12
Sounds 136:25
137:1 274:12
source 78:25 111:10
142:5 147:5 174:10
175:2 204:2, 9 205:1
sources 79:3 200:20
261:7
southeast 92:17
Southern 123:4
spare 51:19
speak 71:15 73:2
78:11 120:11 125:13
140:24 209:7 215:21
260:16 265:10, 16, 25
266:4, 15, 25
speaker 193:9
speaking 72:15 73:7,
10, 15 84:6 132:20
178:16 186:22
204:18 212:6 220:9
246:12 250:17
speaks 107:25
138:11, 14 142:19
145:7 221:4, 5
222:24 223:5, 7, 8, 18
224:2, 6, 11, 15, 20, 21
225:2, 9, 14, 18, 23
226:11 227:13
230:10, 11, 13, 16, 25
231:6, 9 232:11, 14
236:6 237:1, 11, 22
238:14, 15, 24 239:5,
7, 16 241:24 248:15,
19 251:23 258:23
259:1, 3, 7, 12, 13, 16

260:18 261:1 262:2
265:5 266:7
special 57:2, 3
171:22
specialized 30:20, 22
31:1
specific 18:23 19:12
30:15 52:24 54:21
55:22 57:23 59:8, 18
60:24 65:9 71:23, 24
77:16 78:23 82:12,
13 86:19, 20 94:1
95:17, 18, 25 99:10,
12, 23 100:3 101:16
103:11 108:19 117:5,
16 133:23 135:14, 18
141:15 143:7, 10
154:24 160:4 163:12
169:3, 12 171:7
173:18 179:12
180:14 181:6, 21, 22
187:11 194:5 204:15
205:11 211:21
216:12 217:6 218:22
220:1 226:24 230:14
233:25 236:2 249:11
253:22 263:22
specifically 10:7
21:19, 21 29:14, 18
30:24 37:20 40:6
42:17 48:14 60:17
63:6 69:11 89:15
113:18 117:10
120:15 126:24
128:16 132:20 135:9
146:14 160:22
163:11 167:12
171:24 172:19
175:17 176:15
204:21 216:6, 7, 9
223:6 230:1 234:23
235:10 243:13, 14
244:8, 9 249:10
269:15 273:4
specifics 98:23
109:18 155:2, 5
246:4
speculate 19:11
120:23

speculation 148:20
149:12 154:8 156:24
167:22
spelling 7:13
spend 37:4
spending 71:20
sphere 194:12
spinning 180:12
split 41:9 66:3
68:19 104:6 158:16
175:19 219:7, 10, 13,
16
splits 127:9 130:20
spoke 72:2, 6, 10
73:5 145:4 192:18
250:23, 25
sponsor 259:15 266:1
sponsored 213:11
sponsors 239:23
265:12, 19 266:5
sprint 57:12
stable 123:20
stack 75:21
staff 16:8 18:6, 7, 10,
16, 20, 21 19:22
20:12 40:20 44:25
48:17 49:20, 21, 24
50:12 51:3 62:7, 25
64:13 69:21 70:5
87:8, 11 171:19
173:22 178:17
186:23 192:11, 19
194:17 198:15
204:19 214:12
220:11 224:8, 12
230:2, 17 245:12
246:13 256:17
260:12 271:16
staffers 110:7
stage 234:11
stamp 168:7 220:22
221:8 240:17 249:16
251:12
stand 99:24
standard 42:15
54:18, 23 119:14, 17
124:10, 13, 16 136:3
160:2
start 7:22 87:20, 25
90:20, 24, 25 94:11

95:8, 20 97:21 215:6
251:21 255:3 262:22
started 31:11 32:21
36:20 46:4 47:4
48:11 54:3 87:16
94:12 143:15 162:1
195:14 215:3 235:9,
17 253:14
starting 58:17 90:6,
20 91:2 97:9, 13
262:25 263:1
State 1:7, 21 2:20
7:19 8:13 20:5 21:5,
6 22:24 23:5, 9, 21
24:16 33:12, 13, 16,
19 38:16 40:8, 21
42:20 58:6 59:5
69:11 80:8, 9, 16
105:13 124:22
126:17 127:4 132:4
133:4 137:18 160:25
170:13 171:4 177:2,
7 268:20, 21 275:3
276:20
stated 134:17
state-filed 13:18
state-level 14:14
statement 150:12, 19,
25 229:2
statements 56:14
69:11
STATES 1:1 30:14
38:8 69:8 129:23
132:9 134:3
State's 122:16
stating 7:12
station 255:14
stationed 132:5
statistics 170:24
statute 132:2, 22
133:6
statutes 91:1
statutory 36:12 90:9
124:21 128:15
stayed 122:10
STENOGRAPHER
236:17
stenography 275:11
step 86:5

stepping 201:19
steps 17:3
sticker 242:24
263:18
Stipulations 4:4
stood 167:15
stop 52:18 53:5
193:13 196:25
202:15 203:13 212:1
stopped 187:25 246:3
stored 53:18 146:18
162:19
streamline 136:21
Street 2:4, 16, 22
167:14
strength 131:18
strictly 84:18
strike 28:16 73:9
86:5 88:12 113:25
200:6 218:15 230:15
strike-through 35:4
strike-throughs 35:2,
9
strike-
throughs/changes
35:22
strong 123:17
structure 40:13
stuck 166:20
studied 26:12, 14
studies 26:16 30:21
study 26:7, 11, 17, 18
27:8, 21 29:7, 12
studying 26:24, 25
29:24 30:21
Stuttgart 25:4
sub 158:9
subcolumn 115:12
subdivisions 158:14
subject 4:15 14:19
33:14 61:20 98:12
104:14 147:19 152:2
201:11 217:12
275:13
submitted 61:18
275:14
subpoena 12:24
14:25
subpoenaed 14:21

subsequent 42:4
46:11 139:15 144:15
subsequently 41:22
subset 67:19
substance 278:1
substantial 275:24
suggesting 78:3
suggests 148:23
149:16
Suite 2:12, 16, 22 3:4
summary 117:8, 13
126:23
summer 37:7
supervision 275:13
supervisor 36:7, 10
support 157:4, 10, 16
supposed 57:17
258:11
sure 18:9 29:14
45:2 60:21 61:1
74:24 75:19 80:25
90:7 92:23 109:15
110:5, 9 111:19
121:6 138:19 170:14
183:24 199:2 225:16
232:6, 9 257:14
261:5 270:7, 10
273:1
Survey 45:10
swap 253:3
sworn 1:18 7:3
275:6
system 120:14, 18
191:10, 12, 15 192:1,
4, 7 229:22
systems 29:17 39:8
74:14 168:7 240:18

< T >
table 82:22 114:18
115:1 120:12 169:25
170:1 179:22 250:8
270:11
tactical 36:1
take 10:15 17:3
34:2, 25 38:6 47:19
56:8, 12 60:15 73:25
109:23 110:12 120:7
215:7 216:15 220:15

249:5 252:24 254:20
255:2
taken 1:18 31:1
38:9 178:5 275:19
talk 150:4 155:5
198:8 220:23 226:8
251:13
talked 36:16 55:21
74:7 224:7 242:5
270:23
talking 10:1 28:22
87:16 110:25 122:15
152:12 191:7 192:10
193:19 200:16
205:20 206:1 214:11
230:15 265:7
talks 128:16
Talley 3:3 7:24
10:5, 7 11:3, 4 12:23
13:3, 7 14:2, 6, 18
28:19 30:17 32:3
35:25 48:18 49:3
50:2 64:4 73:20
77:14 82:9 83:4
85:20 86:16 93:24
95:2, 22 98:10, 20
99:2, 9, 22 100:5, 13,
21 101:15 102:1, 5
103:1 107:9, 17
108:16 109:6, 13, 20
110:5, 23 111:13
112:7 117:20 118:5
119:1 125:21 126:15
128:22 129:11
130:11, 25 131:10
133:11 136:4, 25
137:21 138:4, 16
139:3 141:3, 8
142:18 144:2, 4, 7
145:10, 15 148:19
149:6 150:12 152:8
153:10 154:5, 16
155:13 157:6 159:7,
10 162:3, 13, 16
165:10 166:7 171:2
179:10, 19 180:11, 21
181:1, 8, 17, 24
182:12, 21 183:6, 12,
19, 24 184:3 186:13,
17 188:16, 23 189:12

190:5 191:16, 20, 23
192:21 193:13 194:8
196:25 199:14, 17
200:7, 23 201:23
202:3, 15 206:16
211:19 213:8, 10
217:8 218:24 220:3
223:22 224:16, 24
225:4 226:16 227:16
237:5 240:11 242:18
246:23 248:5 250:20
253:19 258:6 260:20
261:4 262:14 263:2,
10 264:17 266:6
267:10, 19 268:4
269:2, 24 270:1
271:23 272:1 273:14,
19 274:8, 14
target 105:25
task 43:7
tasked 19:8 57:20
Taylor 271:11, 14
teachings 29:12, 20
team 135:11
technical 16:11, 13
39:11 43:8 45:23
46:18, 20 47:9 84:6
127:23 152:17
153:23 166:21 167:1
technically 248:18
telephone 163:1, 3
196:9 203:1 224:4
tell 45:19 90:19
142:1, 6, 8, 10 147:16
149:22 150:9 153:5
154:12, 18 173:24
204:10 217:25
221:22, 25 240:24
254:4 257:22, 25
262:24
telling 30:3 106:15
130:20 138:20 153:3
182:18
tells 135:12
template 107:22
108:23, 24 109:7, 16
110:6
ten 13:14 73:25
220:15 270:6
tendency 275:24

term 43:8 101:6
129:21 132:8 141:20
157:9
terms 29:11 34:9
60:25 90:14 128:8
157:9
terrain 27:23
terribly 75:24
Terry 72:25
testified 7:3 24:21
110:15 121:7 161:19
testifying 8:25 9:1
testimony 95:5
111:6 118:2, 18
130:3 136:15 139:12
150:2 157:4 170:17
230:22 236:24
244:22 250:11
262:25 263:7 275:7
tests 126:6
Texarkana 29:1
text 34:21 35:18
56:18, 19 105:1
107:13 114:14
115:11 138:3 139:23
141:23 183:22
184:15 253:24
270:17, 20, 21 271:1
texts 271:1
textual 34:14
Thank 9:20 10:23
85:23 104:15 114:9
137:12 165:8 172:7
174:16 175:14
176:18 183:17 187:3
207:21 210:6 212:12
213:12 226:22 230:6
235:2 240:10 244:1
245:4 263:16 273:15,
17
thick 122:1
thing 10:17 55:7
82:14 90:13 114:4
151:14 157:8 177:24
things 46:8 55:24
56:10 60:18 81:23
90:17 92:9, 23
151:13 189:18
221:23 223:16

235:25 248:13
255:15 261:24
think 30:24 42:17
48:24 64:21 82:18
95:4, 13 99:9 106:12
108:21 110:8 118:21
120:14 121:7, 10
136:4 141:4, 8 149:8,
13 150:19 151:18, 22
155:14 162:6, 13
179:19, 23 180:14
192:23, 25 195:22
200:10, 23 201:9, 25
203:24 229:7 240:16
245:16 251:11
253:19 268:9, 16
270:16 271:20
273:23
thinking 154:1
196:20 205:24
third 50:20 89:19
168:17 241:9
third-party 276:9
Thornton 15:4
thought 74:24 259:25
thoughts 101:20
three 56:15 165:5
172:2 206:20 247:25
271:21
throw 60:18
thumb 254:20 255:2,
23, 25 256:3, 9, 14, 18
THURSTON 1:6
2:18 7:10
ticker 88:18 91:6, 7,
25 92:4, 7, 16, 19
121:8 122:5, 9, 10
161:21 209:3 265:20
tie 128:10 223:5
tied 29:8 81:23
82:1 83:15
ties 128:2
tight 57:1
tighter 56:24
tightly 82:1
TikTok 31:16 32:7,
25
timberlands 27:20
time 8:18 10:15
13:16 14:24 15:11

17:12 20:13 24:13
26:18 27:10 29:10
32:22 34:5 37:2
38:1 42:2 47:15
50:5, 9 51:20 52:22
53:1 56:4 57:6, 12,
23 58:9, 13, 17 59:9,
15 60:3 63:8 70:22
71:20 73:18 80:11
91:10 106:12 120:1
126:25 134:17
153:14 159:12
163:23 166:19
170:15, 21 171:25
178:5 179:23 198:24
204:2 227:15 228:24,
25 234:10 235:22
236:7 246:6 253:12,
13 273:15
timeline 56:2 57:13,
23
times 49:23 53:4
94:12 95:8 96:3
97:19 121:23 215:5
232:16 252:17
257:12 258:24 259:2,
23
timing 60:1 215:3
222:1
title 15:5 33:7
titled 66:21 252:2
today 8:25 10:1, 12,
25 12:7 23:12
103:19 111:7 138:19
139:12 140:5 147:16,
24 149:22 150:11
151:13 153:4, 13
155:5 169:5, 9
174:10 180:12 189:9
237:2 270:23 272:10,
18 274:7, 13
today's 8:23 12:14,
21 13:1 14:2, 17
19:18, 21 20:10
told 36:4, 17 65:16
98:24 99:14 154:12
191:13 203:16 223:9
262:1
tool 85:10

top 35:20, 21 168:7,
18 184:13 222:3
240:16, 20 242:6
249:16 252:2 256:23
257:23
topics 30:16
Tosh 268:2, 19
269:4, 13, 17, 20
total 76:1 91:7, 21
92:25 100:11 101:11
121:8 124:4 159:16
164:4, 20 168:1
194:5 200:2 242:7,
15
totally 200:6
touch 33:16 67:12
touched 133:20
253:1
touching 67:9
town 13:14 25:22
traditional 255:21
traditionally 33:18
training 30:20, 23
31:1 39:11, 16, 20, 23,
24 40:1, 7 45:17
46:10, 11, 13, 22, 23
47:5 62:6, 11 133:18
168:12
trainings 39:5, 9
47:1 69:14, 18, 19
transcribed 275:12
transcribing 9:7
transcript 9:11 20:4
276:1, 12
transcription 275:10
278:1
transcripts 20:6
translate 83:23
translated 130:18
transmission 107:3
transmit 255:25
transmitted 42:8
51:16 163:20 199:24
Transportation 15:2,
10 23:20
treat 17:21
treated 17:13 55:1
231:21 273:2
treatment 17:14

tree 26:15
trick 9:16
tried 54:7 56:10
151:13
true 17:1 131:5
275:10
truly 48:25 91:9
145:23
Trust 72:3
truth 275:7
truthfully 9:2 10:12
try 46:4 55:24
75:24 86:7 127:9
186:17
trying 9:15 15:5
41:8 49:5 64:21
86:14 107:7 123:10
149:6 186:18 190:8
200:13, 20 218:1
252:15
Tucker 205:9, 12, 14,
21 206:5, 11, 15
207:1, 9, 11
Tucker's 207:12
Tudor 15:7
turn 33:4 74:4
87:14 121:14 136:17
251:25
turned 121:21, 24
122:7 139:18 140:13
178:4
turning 121:18
160:15
Two 2:8 43:21
44:22 45:8 52:10
57:7 76:24 150:13
165:5 175:18 182:21
195:24 200:7 203:10
204:5 219:7, 15
222:20 248:13 250:6
251:8, 17 253:21
255:6, 10 256:1
269:7, 15
type 28:21 29:4
35:17 64:16 69:19
98:25 99:18 101:12
104:20 119:11
143:22, 24 144:9, 10
157:14 168:10, 11, 14
169:19, 20 170:4

180:5 192:5 196:20
217:2, 19, 24 238:17
241:15 242:16
247:23 249:23
typed 35:17
types 20:17 28:24
99:23 116:5 201:13
typical 177:5
typically 52:11
177:25

< U >
U.S 44:19 73:2
UALR 30:4
ultimately 237:16
238:2, 25 239:12
unable 10:11 149:22
unallowable 134:10
unavailable 14:23
un-Bates-stamped
168:5
undergraduate 30:21
underline 35:5
underlined 35:8
underlines 35:3, 9
underlying 143:11
underneath 115:13
understand 9:4, 12,
16, 18, 24 10:9, 12, 21
22:4, 5, 19 38:7, 8
49:6 66:8 75:11
76:12 95:9, 16 101:6
102:3 103:2 109:4
114:23 123:25 126:1
127:8 130:13 131:8
140:21 141:8, 22, 24
142:24 150:3, 13
153:13, 15 166:16
181:8 184:6 198:6
200:13, 17, 20 203:24
209:6 219:4 226:9
229:5 236:21 242:25
258:3 260:14 261:5,
6 264:17 265:13, 22
266:2, 13, 16, 21, 25
268:13 274:8
understanding 18:4
20:16 23:8 43:23
55:14 56:8 57:13
58:5 64:1 68:15

70:1 74:13 76:2
85:3, 9 92:15 106:4
124:14 127:6 130:6
133:1 153:25 154:9
159:19 199:25 220:5
237:13 254:7 267:1
understood 9:22
33:8 74:18 95:5
122:3 125:6 127:3
134:14 139:12
169:13 236:25 238:1
243:18 270:16
uniform 87:17, 19
101:11
uniformly 18:17
unique 27:14, 17
unit 81:19
UNITED 1:1
universally 190:16
217:15
University 25:20
26:6
unsure 232:6, 8
updated 106:12, 16
122:12 253:16
updates 122:13
updating 93:3
uploaded 63:17
180:2
urban 27:19
usage 39:23
use 34:18 35:16
46:5 60:24 70:11, 15
71:7 73:22 74:11, 15
75:2, 5 77:9, 12
79:11 80:21 82:6
83:2 84:6, 21 113:1,
2 119:15 129:23
183:4, 10 208:24
240:25 254:25 255:1
usher 268:22
ushering 268:15, 18
usually 180:13
utilize 75:25
utilized 103:17

< V >
Vaguely 115:18
171:11

vaguest 233:20
Valley 28:1
variance 64:20 66:1,
6, 9 106:1
variances 125:4
variations 120:2
variety 78:10
various 29:8 82:19
95:14 163:6 195:19
Velma 22:17
verbal 203:2 208:12
verbally 78:16
141:14 173:1 191:13,
23 199:23 202:21
203:1 210:25 211:6
verbatim 275:11
verified 90:4
versa 253:17
version 39:14 96:8
111:24 139:15
232:15 243:17 252:6
253:15, 16 257:12, 18,
19, 20
versions 120:4
254:24
versus 7:9 27:20
28:25 29:5 34:6
67:19 138:7
vice 253:17
video 46:1, 2
videoconference 2:3,
13, 15, 21
view 38:6 105:25
244:13, 24
viewed 45:14 248:15,
23
virtual 8:19 40:1
170:18
virtually 7:21 8:16
170:22 227:10 228:7
visit 52:23 85:25
86:2 262:19
visited 53:13
visual 34:15 46:7
visually 78:17, 21
voicemail 262:5
voicemails 262:4
vote 132:24
voted 34:13 76:17,

24 266:18 267:2
voters 76:24
voting 24:19 47:20,
23 76:14 131:18
VS 1:5

< W >
waive 118:9 151:17
220:6
waived 150:17, 23
165:19 276:11
walk 53:7 137:4
254:20
want 9:16 12:13, 17
24:23 26:21 33:4
38:7 56:1 61:5 69:7
87:14 93:6 95:9, 15
106:17 107:25
113:20 114:3, 14
115:15 121:3, 20
136:11 137:4 150:7,
13 163:14 183:24
184:3 186:18 193:3
200:3, 18 203:14, 24
217:21 220:21
226:25 257:13
263:13, 14 269:4
273:23
wanted 56:6 57:5, 9,
19 81:7 88:2 90:24
96:5 102:21 108:9
110:18 130:5, 8, 19
140:21 142:24
147:23 173:5 174:8
175:25 179:7 187:23
189:24 198:6 208:10
215:16 237:23 254:2,
7 260:14, 24 265:8,
13, 22 266:2, 13, 21
Washington 2:16
25:18, 24
watch 41:22 63:15
228:22
watched 37:19 39:18,
19 45:25 63:14
170:22 227:10
watching 39:17, 20
42:4
water 26:18 27:24

way 12:21 29:1
34:24 41:9 46:5
55:12 56:5, 7 66:2
67:13 69:12 84:1
87:20 110:21 140:7
141:5, 15 142:6, 9
147:18 148:13, 18
150:8 151:17, 23
199:24 203:3 211:11
222:16 225:8 238:11
248:7, 9 265:20
ways 51:9 69:7
95:23 203:16
Webinars 37:18
website 63:7, 10, 12,
17, 19, 22 64:3 86:13
262:19
weeks 12:18 57:8
well 7:11 23:16, 22
27:1 36:12 43:13, 15
58:9 61:11 69:20
79:17 86:23 94:25
96:11 109:12 114:11
131:16 135:24 144:4
158:16 179:19
187:13 188:1 191:3
196:11 197:17
208:14 243:1 270:17
well-settled 68:16
went 15:15 66:18
68:6 74:20 89:3
90:3 99:24 109:18
119:22 126:24
140:11 147:17
148:11 153:3 204:7
223:10 226:9
we're 8:24 16:4
41:18, 21 53:9 70:3
108:22 110:25 229:7
268:7 270:3 274:15
West 1:22 3:4 28:6
Westlaw 60:13, 14
we've 18:2 73:20
74:7 87:15 118:18
150:21 179:19 208:8
Wheeler 4:17 114:7,
23 120:20
Wheeler's 120:13
wheels 180:12

whichever 74:15
249:3
Whitaker 165:17, 25
166:9 167:20, 24
214:18, 24 215:16, 17,
22
White 25:8, 22, 23, 24
168:21 242:12
William 30:4
Williams 1:22 3:4
11:3, 5, 11, 13 135:10,
13
Windows-based 27:4
wished 65:14
withdraw 269:3
withheld 61:16
261:15
witness 1:17 3:2
4:6 8:1 32:5 73:24
74:1 82:10, 21 83:8
85:23 86:17, 18 99:3,
22 101:18, 21 102:4
103:1 107:10, 20, 23
108:17, 25 109:5
110:24 112:7 117:22
118:8 125:21, 25
126:15, 19 128:23
129:11 130:25
131:10 133:11, 15
136:6 137:1 148:21
149:19 151:16, 24
152:8 154:6 159:10
162:3 166:7, 15, 17
171:3, 5 179:10, 14
180:15 181:19
182:13, 22 183:1, 8
186:12, 14, 20 188:16
190:6 192:22 193:5
194:9, 25 197:2
199:18 201:4, 25
202:7 206:19 211:19
213:9, 12 217:11
218:25 220:4, 16
223:22 224:17
226:17 227:16
242:19 260:21
261:10 262:15 263:3
268:5, 11 269:25
270:9 272:6 273:19,

21 275:5, 14 276:11,
16
witness's 151:16
wondering 169:18
Wong 2:13
Woodyard 3:4
Word 35:1, 11
152:10
words 271:22
work 10:16 17:1, 11
18:19, 24 19:5, 11, 12
38:22 41:3 42:1
43:6 50:8 51:7, 17
52:14 53:9, 16, 22
56:10 57:11 60:9, 10
70:19, 21 71:14
95:11 97:5, 16
111:20 112:12
120:14 136:24
139:13 140:17
155:10 156:15 161:4,
7, 10 162:18 166:20,
21 172:12 173:5
174:22 175:20, 21
176:15 177:2, 23, 24
185:5 195:8 196:7
208:5 210:19 213:14
215:11 223:9, 11
228:2 246:20 247:3
250:13, 16 252:8, 14,
15, 22 253:6, 20
255:17 256:13
259:10, 14, 18 270:20
272:24 273:18
workday 53:5
worked 11:4 15:9
19:15 21:14, 19, 21
22:9 36:13 41:4
43:4 45:3 48:20, 23
49:7 51:10, 11 52:10
54:2, 20 62:17 97:5
139:5, 22 140:2, 8, 12,
15, 16 141:2, 21, 23
142:4, 5, 16 143:1, 22
144:14 145:23 146:9,
16, 19, 25 147:1, 10,
17 148:16 149:2, 23
150:1 153:9 154:3
156:19 160:24 167:3
171:16, 20 172:11, 19,

20 173:10 175:5, 17
177:3, 8, 9, 10 182:10
184:19, 23 185:3
187:19 189:25
195:18 196:1, 4
197:23 198:14 199:3
205:16 211:11 216:7
217:3 222:8 223:4, 7,
8 229:14, 15 234:3, 7,
9 235:7, 18 243:16,
17 244:7 245:10, 12,
15, 17 248:9 252:10
253:5 258:19
working 21:22 32:16
36:4 46:15 50:5
53:17 57:24 60:7, 16
65:5 70:25 71:22
73:9 90:15 95:18
97:14 112:1, 3 121:9,
15, 19 122:13 128:4
138:13 142:1 145:21
146:5 147:3, 4, 5, 14
156:4 160:19, 22
166:2, 4, 18, 24
167:14, 23 170:6
171:14, 23 172:16
175:16 176:14, 20, 25
178:7, 20 179:3
184:17, 24 185:13
187:5, 10 194:15
195:11, 13, 15 197:22
200:14 205:7, 11, 12,
14 207:23 208:2
210:13, 16 212:19
213:4 214:5, 21, 23
215:4 216:3, 5, 22
221:19 222:23 223:1
224:6, 11 229:12
233:23 234:18
236:25 237:3, 11
240:5 241:5 243:13
245:7, 21 250:1
253:12 254:16 258:3,
12, 16, 18, 22, 25
259:3, 6, 21 260:1
262:11, 18, 21, 23
263:6 267:3 268:2
272:20
workroom 254:14

255:22
worries 270:12
wrap 192:9 220:9
wrestling 149:7
write 83:17
writing 114:15
191:23 273:5
written 125:14
141:13, 19 143:5
223:19 224:5 276:8
wrong 112:18 130:4
208:13
**www.ArkansasRealtim
eReporting.com**
276:23

< Y >
Yeah 220:16
year 15:11, 21 26:21
30:6, 11 48:9
years 29:3 31:12
32:22
yesterday 82:15
151:4, 13 165:4, 11
183:20 240:16 268:6
York 2:5

< Z >
zoom 88:24
zoomed 88:25 187:14

WORD LIST

< 0 >

00220 (1)

07/02/2024 (1)

< 1 >

1 (23)

10 (7)

10/4/2021 (1)

10:19 (1)

10:33 (1)

10006 (1)

104 (1)

11 (5)

11:53 (2)

1130 (1)

114 (1)

12 (5)

12:41 (1)

12:56 (1)

13 (6)

134 (1)

135 (6)

137 (1)

14 (7)

145 (1)

14-ish (1)

14th (1)

15 (5)

16 (3)

160 (1)

1627 (2)

165 (1)

16th (2)

17 (5)

1700 (1)

172 (1)

174 (1)

175 (1)

176 (2)

18 (5)

1800 (1)

183 (1)

187 (3)

19 (6)

1959 (13)

1961 (1)

1964 (1)

1965 (2)

1968 (2)

1971 (3)

1976 (2)

1978 (1)

1979 (2)

198 (1)

1981 (1)

1982 (5)

1983 (1)

1998 (1)

< 2 >

2 (22)

2:37 (1)

2:52 (1)

20 (13)

200 (1)

20005 (1)

2001 (1)

2003 (1)

2010 (2)

2011 (43)

2017 (5)

2019 (2)

202 (1)

2020 (30)

2021 (15)

2022 (1)

2023 (2)

2024 (5)

205 (1)

207 (1)

21 (5)

210 (1)

212 (2)

214 (1)

216 (4)

21st (1)

22 (5)

220 (1)

221 (1)

222 (1)

223 (1)

224 (2)

226 (1)

23 (6)

230 (1)

233 (1)

235 (4)

24 (6)

240 (1)

243 (1)

244 (1)

245 (1)

249 (3)

25 (5)

251 (1)

256 (2)

25th (2)

26 (4)

263 (1)

27 (3)

272 (1)

275 (1)

28 (4)

283 (2)

28th (1)

29 (3)

290 (2)

299 (2)

< 3 >

3 (14)

30 (6)

31 (5)

31st (2)

32 (3)

323 (2)

33 (3)

334 (2)

34 (4)

341 (2)

342 (1)

35 (5)

354 (2)

36 (3)

360 (1)

366 (2)

382 (2)

3rd (1)

< 4 >

4 (11)

4:02 (1)

4:13 (1)

4:18 (2)

4:23-cv-471-DPM-

DRS-JM (1)

40 (1)

400 (1)

407 (2)

414 (2)

415 (6)

416 (2)

419 (1)

42 (1)

424 (2)

425 (2)

431 (2)

44 (1)

445 (2)

449 (1)

451 (1)

454 (2)

458 (2)

459 (2)

465 (1)

479-301-2040 (1)

481 (2)

494 (2)

< 5 >

5 (6)

501 (2)

524 (2)

532 (3)

541 (2)

548 (2)

557 (1)

560 (4)

566 (1)

571 (3)

577 (2)

592 (1)

< 6 >

6 (9)

600 (1)

610 (1)

682-1300 (1)

683-2520 (1)

688-8806 (1)

< 7 >

7 (8)

700 (1)

714 (1)
720 (1)
721 (1)
72201 (2)
724 (1)
725 (1)
726 (1)
727 (1)
72703 (1)
728 (1)
729 (3)
732 (1)
741 (3)
743 (16)
743-MLD419 (1)

< 8 >
8 (5)
8/25/2021 (1)
8/31/2021 (1)
80 (1)
823-7138 (1)
877 (3)
89 (1)

< 9 >
9 (6)
9/20 (1)
9/24 (1)
9:00 (1)
92660 (1)
94111 (1)
949 (1)
965-2200 (1)
984-8864 (1)

< A >
a.m (4)
ability (12)
able (17)
above-styled (1)
Absolutely (28)
acceptable (3)
accepted (1)
access (15)
accessing (1)
accomplish (2)
account (6)
accounts (1)

accurate (6)
accurately (4)
acknowledged (1)
acknowledging (1)
ACKNOWLEDGMEN
T (1)
act (4)
acting (1)
action (7)
actions (1)
active (1)
actively (1)
activity (2)
actual (17)
add (2)
added (1)
addition (7)
additional (19)
address (1)
addressed (2)
addresses (3)
Aden (102)
adequate (1)
adjacent (1)
adjourned (1)
administration (1)
Administrative (1)
administrator (1)
adopted (4)
adoption (1)
advance (1)
advantage (1)
advice (2)
advise (2)
advising (2)
affect (1)
affiliation (2)
African (4)
Agencies (18)
agency (1)
ago (4)
agree (1)
agreed (1)
ahead (24)
aimed (1)
al (3)
alerted (1)
allegation (1)
allegations (1)

alleged (1)
ALLIANCE (3)
allow (12)
allowable (1)
allowed (8)
allowing (1)
alluvial (2)
alongside (2)
amended (9)
amendment (9)
amendments (2)
American (10)
amount (1)
analyses (1)
analysis (7)
analyst (2)
and/or (14)
answer (99)
answered (3)
answering (2)
answers (2)
anticipated (1)
anybody (2)
anymore (1)
APA (2)
Apavel@omm.com
(1)
apologies (1)
apologize (4)
appear (5)
appearance (1)
APPEARANCES (3)
appears (6)
applied (1)
apply (2)
appointment (2)
approach (1)
approached (1)
appropriate (2)
approximately (5)
April (1)
AR (1)
archived (1)
area (9)
areas (12)
arena (2)
ARKANSAS (76)
arm (1)
as-amended (2)

Ashley (1)
Asian (2)
asked (20)
asking (8)
aspect (2)
aspiration (1)
aspirations (1)
Assembly (13)
asserted (1)
assess (3)
assesses (1)
assessing (1)
assessment (10)
assigned (5)
assignments (2)
assistance (2)
assistant (2)
assisted (2)
associate (1)
associated (27)
association (2)
assume (2)
assuming (3)
assumption (2)
attached (3)
attachment (1)
attend (6)
attendance (2)
attended (6)
attending (2)
attested (1)
Attorney (16)
attorneys (7)
audibly (1)
August (6)
authorization (4)
authorizations (2)
authorized (4)
authorizing (2)
autoBound (43)
autoBoundEDGE
(55)
automatically (1)
availability (2)
available (86)
avoid (2)
avoiding (7)
aware (35)
awareness (1)

Awesome (1)	Blake (2)	bodies (2)	called (5)
< B >	blasted (1)	body (3)	calling (1)
back (35)	bled (1)	book (6)	calls (13)
background (2)	Block (16)	born (2)	candidate (1)
backup (3)	blowups (1)	Boston (2)	candidates (1)
bad (2)	BLR (83)	bottom (21)	capability (5)
balance (1)	BLR-488 (1)	bound (1)	capacity (14)
balanced (1)	BLR-Byrd-FOIA-	boundaries (6)	Capitol (2)
balancing (2)	01626 (2)	boundary (2)	capture (2)
bar (1)	BLR-CMA (1)	bounds (6)	captured (3)
barred (2)	BLR-CMA-00224 (1)	Bowen (38)	captures (1)
base (2)	BLR-CMA-00257 (2)	Bowen's (1)	care (1)
based (60)	BLR-CMA-00588 (1)	box (1)	careful (2)
baseline (2)	BLR-CMA-04156 (2)	brain (1)	Carolyn (1)
basic (1)	BLR-CMA-04233 (3)	Brascher (10)	carried (1)
basically (1)	BLR-CMA-08775 (2)	break (6)	carry (4)
basis (11)	BLR-CMA-181 (2)	breakdown (5)	carrying (4)
Bates (4)	BLR-CMA-209 (2)	breakdowns (2)	CASE (46)
Bates-stamped (13)	BLR-CMA-217 (2)	breaking (1)	cases (6)
Beach (1)	BLR-CMA-234 (2)	breaks (2)	cat (1)
bear (1)	BLR-CMA-243 (2)	Breanne (1)	catch (1)
Bearden (2)	BLR-CMA-250 (2)	Brewer (1)	categories (5)
bedrock (1)	BLR-CMA-275 (2)	bridge (1)	category (2)
Beebe (3)	BLR-CMA-284 (2)	Bridges (1)	cause (1)
began (7)	BLR-CMA-291 (2)	briefly (2)	caveat (2)
beginning (7)	BLR-CMA-316 (1)	Briggs (1)	CCR (2)
behalf (10)	BLR-CMA-328 (2)	bring (2)	CD2 (3)
believe (95)	BLR-CMA-335 (2)	broke (2)	cell (5)
belong (2)	BLR-CMA-342 (1)	broken (2)	census (53)
Ben (1)	BLR-CMA-348 (2)	brought (2)	Center (4)
benchmark (2)	BLR-CMA-360 (2)	Brown (1)	Central (1)
Benham (1)	BLR-CMA-376 (2)	Broyles (3)	certain (14)
B-e-n-h-a-m (1)	BLR-CMA-400 (2)	building (1)	certainly (3)
Benjamin (5)	BLR-CMA-408 (2)	BUREAU (30)	Certificate (1)
best (5)	BLR-CMA-418 (2)	Bureau's (1)	certificates (1)
bet (1)	BLR-CMA-425 (2)	Burleson (1)	Certification (2)
better (3)	BLR-CMA-439 (2)	busiest (2)	Certified (2)
beyond (10)	BLR-CMA-452 (2)	business (1)	certify (2)
big (2)	BLR-CMA-475 (2)	busy (4)	chain (3)
Bill (150)	BLR-CMA-488 (2)	button (2)	chair (1)
billed (1)	BLR-CMA-518 (2)	buttons (1)	chairperson (2)
bills (38)	BLR-CMA-525 (2)	Bynum (1)	chairpersons (1)
bill's (1)	BLR-CMA-533 (2)	< C >	chairs (1)
binders (1)	BLR-CMA-542 (2)	cabinets (1)	challenge (2)
birth (1)	BLR-CMA-549 (1)	calendar (2)	challenging (2)
Bishop (1)	BLR-CMA-560 (1)	calendared (1)	change (17)
bit (10)	BLR-issued (1)	California (2)	changed (7)
black (1)	BLR's (2)	call (8)	changes (21)
	Board (1)		changing (5)

characteristics (1)	colleague (1)	concerned (1)	continuity (1)
characterization (1)	collect (1)	concerning (1)	contours (9)
characterize (3)	collected (2)	concerns (6)	contract (2)
characterized (1)	collecting (2)	conclusion (1)	contractual (1)
charge (1)	collection (2)	concurrent (2)	contributed (1)
charged (2)	collections (2)	condemnation (1)	control (1)
chart (2)	college (3)	conducted (2)	conversation (3)
check (5)	colloquially (1)	conference (3)	conversations (3)
checking (3)	color (5)	confidential (5)	convey (3)
checks (5)	color-coded (1)	confidentiality (2)	conveyed (1)
chief (5)	colors (4)	config (1)	conveying (2)
choice (3)	column (3)	configuration (3)	coordinates (1)
choices (5)	come (19)	confirm (1)	coordination (2)
choose (1)	comes (5)	confirmed (1)	copied (2)
chooses (1)	comfortable (1)	confused (3)	copies (3)
choosing (2)	comfortably (1)	confusing (1)	copy (23)
chose (3)	coming (9)	congress (3)	cores (1)
CHRISTIAN (3)	commenting (2)	congressional (208)	corner (7)
circle (1)	comments (1)	connected (1)	correct (153)
circuits (2)	commission (3)	connection (1)	corrections (1)
circumstance (1)	committee (47)	consider (16)	correctly (6)
cities (1)	Committees (9)	consideration (2)	correspond (4)
City (2)	common (2)	considerations (3)	correspondence (2)
Citygate (9)	communicate (1)	considered (13)	corresponding (1)
Civil (2)	communicated (4)	considering (2)	cosponsor (2)
claim (6)	communicating (2)	consistent (5)	Council (1)
claims (7)	communication (10)	consistently (1)	counsel (9)
clarified (1)	communications (14)	constantly (1)	counsel's (1)
clarify (11)	communities (11)	constitution (2)	counties (35)
clarity (2)	Community (7)	constitutional (2)	country (1)
Clark (5)	compact (4)	construction (1)	county (47)
class (1)	compactness (10)	consult (1)	couple (2)
classes (4)	company (2)	consultants (1)	course (10)
clay (1)	compare (2)	consultation (4)	courses (1)
clean (2)	compared (6)	consulted (2)	COURT (10)
clear (23)	comparing (1)	contact (11)	courtroom (1)
clearly (2)	compilation (1)	contacted (3)	covered (1)
clicking (1)	compiled (1)	contacts (2)	CRC (2)
clients (1)	complaint (2)	contain (1)	create (8)
climatology (1)	complaints (1)	contained (5)	created (15)
closely (1)	completely (4)	contemporaneous (1)	creating (4)
cloth (1)	completion (1)	content (2)	criteria (20)
CMA (1)	compliance (1)	contents (2)	crop (2)
CMA-220 (1)	compositions (1)	contest (1)	cross (1)
CMA-234 (1)	compounded (1)	context (2)	cross-checking (1)
code (11)	computer (58)	contiguity (2)	Crowley's (1)
codified (1)	computers (4)	contiguous (7)	CRR (2)
cohesive (1)	conceded (1)	continued (3)	cubicle (1)
collapse (1)	concern (1)	continuing (1)	cultural (1)

current (4)
currently (3)
Cusick (3)
cycle (17)
cycles (1)

< D >
daily (1)
Dana (3)
data (254)
dataset (1)
datasets (1)
date (6)
dated (4)
DAVENPORT (29)
D-a-v-e-n-p-o-r-t (1)
Dave's (11)
Davis (15)
Davis's (1)
day (8)
days (4)
day's (1)
DC (1)
deadline (2)
dealing (1)
dealt (3)
December (1)
decided (5)
decision (7)
decisions (10)
decrease (1)
decreased (1)
decreasing (1)
dedicated (3)
deep (1)
default (1)
DEFENDANT (3)
defendants (1)
Defense (2)
define (1)
defined (2)
defines (1)
definitely (4)
definition (2)
degree (4)
delayed (1)
deleted (2)
deliberating (1)
Delta (10)

Democrat (2)
demographic (62)
demographics (9)
dendrochronology (1)
Department (6)
departure (1)
depend (2)
depended (2)
Depending (2)
depends (3)
DEPONENT (1)
deposed (6)
DEPOSITION (30)
depositions (1)
deposits (3)
derive (1)
derived (1)
describe (5)
described (7)
describing (3)
DESCRIPTION (2)
design (10)
designate (1)
designated (3)
designating (1)
designation (3)
designations (2)
designed (8)
designing (1)
desire (2)
desires (2)
desk (1)
desktop (4)
detail (1)
detailed (2)
details (1)
determinations (2)
determine (4)
determined (3)
determining (1)
develop (32)
developed (9)
developing (42)
development (35)
deviation (9)
diagonal (2)
difference (2)
differences (2)
different (40)

difficult (3)
difficulty (5)
dilution (3)
direct (9)
directed (7)
directing (2)
direction (10)
directions (2)
directly (6)
director (5)
directs (2)
disagree (2)
disclose (5)
discoverability (1)
discoverable (1)
discretion (1)
discrimination (5)
discuss (8)
discussed (7)
discussing (7)
discussion (4)
discussions (4)
disputes (1)
distance (1)
distinction (3)
distribution (2)
DISTRICT (68)
districtr.org (2)
districts (57)
dive (2)
Divide (1)
divided (2)
dividing (3)
division (6)
divisions (1)
divulging (1)
doc (1)
document (24)
documentation (1)
documented (2)
documents (24)
doing (21)
door (1)
DOS-based (1)
Dot (1)
dots (1)
Dotson (21)
double (1)
double-check (1)

double-checked (1)
draft (28)
drafted (25)
drafter (7)
drafting (49)
drafts (5)
dramatic (1)
draw (14)
drawer (1)
drawing (50)
drawn (19)
drew (13)
drill (1)
Drive (9)
drop-in (2)
duly (3)
duty (1)

< E >
earlier (31)
Early (4)
easier (1)
EASTERN (1)

Ebenjamin@omm.com
(1)
economies (1)
EDGE (3)
edit (1)
edited (2)
educating (1)
education (2)
Educational (3)
effectuate (3)
effectuating (2)
efforts (1)
either (20)
EJ (2)
EJ's (1)
elected (1)
election (7)
electoral (3)
electoral-related (1)
electronic (1)
Elliott (8)
email (75)
emailed (2)
emails (13)
Embarcadero (1)

embarked (1)
embedded (1)
employed (6)
employee (1)
employer (2)
employment (1)
enable (1)
enabling (1)
enacted (17)
enactment (1)
encompassed (3)
encompasses (1)
encounter (1)
ended (2)
endurance (1)
engage (5)
engaged (1)
engagement (1)
engaging (1)
engineer (1)
English (17)
English's (1)
ensure (10)
ensuring (1)
entail (2)
entailed (1)
entire (1)
entities (1)
entitled (2)
entity (1)
environment (1)
environmental (2)
equal (2)
equally (3)
Errata (1)
error (1)
esotallaro (1)
esotallaro@gmail.com (1)
especially (2)
established (5)
establishes (1)
establishing (1)
et (3)
E-Transcript (1)
evenly (1)
event (1)
everybody (1)
everybody's (1)

exact (7)
exactly (15)
Examination (4)
Examiners (1)
example (29)
examples (1)
exception (2)
Exchange (4)
exclusive (1)
excuse (8)
exemplars (2)
exercise (1)
Exhibit (124)
EXHIBITS (7)
existence (1)
existing (3)
exists (1)
expect (1)
experience (4)
experiences (1)
expert (1)
expertise (2)
explain (7)
explained (3)
explaining (1)
explains (1)
explanation (1)
explicit (1)
explicitly (1)
explore (4)
exploring (5)
exposed (3)
express (3)
expression (1)
extend (1)
extent (11)

< F >
face (1)
Facebook (4)
fact (2)
factors (2)
fact-specific (1)
factual (3)
fair (115)
fairly (1)
fall (2)
falls (1)
familiar (19)

familiarity (3)
familiarized (1)
familiarizing (1)
family (1)
far (12)
farmers (2)
fashion (1)
fast (4)
Fayetteville (3)
feature (6)
features (1)
Federal (9)
feed (1)
feedback (1)
feel (2)
fees (1)
field (1)
fields (2)
Fifth (1)
fights (1)
figure (1)
figured (1)
figures (4)
file (8)
filed (13)
files (15)
filing (1)
final (11)
finalize (1)
finally (2)
financially (1)
find (2)
fine (3)
finger (1)
finish (7)
finished (2)
Firm (1)
first (16)
fiscal (3)
five (1)
flipped (1)
Floor (4)
Flowers (12)
focus (1)
focused (3)
FOIA (5)
follow (4)
followed (1)
following (11)

follows (1)
follow-up (1)
foregoing (2)
forgot (1)
Form (34)
forma (3)
format (7)
formations (1)
formats (3)
formatting (2)
formbook (1)
formed (1)
forms (7)
forth (2)
forums (1)
forward (1)
found (2)
foundation (1)
four (13)
four-cornered (1)
fourth (1)
frames (1)
Francisco (1)
frankly (2)
Fred (2)
free (10)
Freedom (2)
frequently (1)
Friday (1)
front (5)
full (2)
function (4)
functioned (1)
functions (2)
Fund (2)
further (7)

< G >
gap (1)
Garrity (6)
Gates (1)
gathered (1)
General (46)
generalized (1)
generally (26)
General's (2)
generate (2)
generated (4)
generating (4)

generic (3)
generically (6)
Geographic (11)
geographical (1)
geographically (1)
geographies (2)
geography (14)
geological (1)
germane (1)
gerrymandering (10)
getting (7)
giant (2)
Gilmore (1)
GIS (7)
give (15)
given (41)
gives (1)
giving (5)
globally (1)
go (54)
goal (2)
goals (5)
goes (4)
going (50)
Gold (2)
Gonzales (2)
Good (12)
Gotcha (14)
gotten (3)
governed (2)
government (2)
Governor (1)
governor's (2)
governs (1)
gracefully (1)
graciously (1)
graduated (1)
Graham (4)
gran (1)
granted (1)
granular (3)
Graphic (16)
grappling (1)
great (1)
grew (1)
ground (1)
grounds (13)
group (7)
grouping (1)

groups (1)
grow (1)
growth (1)
Gtalley@mwlaw.com
(1)
guess (4)
guidance (8)
guided (2)
guidelines (3)
guidelines/rules (1)
guise (1)

< H >
hairs (1)
half (1)
hand (1)
handed (1)
handing (1)
handle (3)
handled (3)
handles (1)
hands-on (1)
handwritten (2)
Hang (1)
happen (3)
happened (11)
happening (1)
happy (2)
hard (10)
Hartz (2)
H-a-r-t-z (1)
Hawaii/Pacific (1)
Hawaiian/Island (1)
Hawaii-specific (1)
Hayden (7)
HB (1)
HB1959 (4)
HB1960 (13)
HB1961 (11)
HB1963 (31)
HB1964 (10)
HB1965 (7)
HB1966 (11)
HB1968 (5)
HB1969 (4)
HB1970 (4)
HB1971 (8)
HB1971-MLD406 (1)
HB1976 (3)

HB1978 (1)
HB1979 (3)
HB1980 (5)
HB1981 (3)
HB1982 (24)
HB1983 (7)
head (2)
hear (3)
H-e-a-r (1)
heard (9)
hearing (5)
hearings (5)
heavily (2)
hectic (3)
Hejazi (1)
held (2)
help (10)
helped (4)
helpful (2)
helping (2)
helps (1)
hereto (1)
hesitation (1)
Hester (5)
Hey (1)
highest (1)
high-level (1)
highly (1)
his/her (1)
history (1)
hold (7)
home (1)
honest (2)
honestly (3)
hooked (1)
hornbook (3)
host (1)
hosted (3)
hot (1)
hour (2)
hours (2)
House (39)
housed (2)
House-related (1)
how's (1)
human (2)
husband (1)
Hutchinson (1)
hypothetical (10)

< I >
idea (17)
ideal (5)
ideas (1)
identifiable (1)
identification (35)
identified (7)
identifies (2)
identify (4)
identifying (3)
identities (3)
identity (1)
illustrated (1)
illustrations (1)
Image (21)
Images (73)
imbalances (2)
immediately (1)
Impact (2)
impacted (1)
impacts (1)
impartiality (1)
implement (11)
implemented (3)
implementing (3)
import (3)
important (1)
imported (1)
importing (3)
inappropriate (1)
include (13)
included (18)
including (6)
inclusion (1)
incorporate (1)
incorrectly (1)
increase (3)
increasing (1)
incredibly (3)
incumbent (3)
incumbents (3)
independent (6)
independently (1)
indicate (2)
indicated (4)
indicates (1)
indicating (1)
indication (2)

indicator (1)
Indiscernible (1)
individual (17)
individually (3)
individuals (1)
inform (1)
informally (1)
information (225)
informations (1)
informed (4)
initial (8)
initially (5)
initials (3)
initiated (3)
in-person (6)
input (2)
inputs (1)
inputted (1)
inputting (2)
inquiry (1)
inside (1)
Instagram (5)
instance (2)
instruct (55)
instructed (5)
instructing (2)
instruction (30)
instructions (27)
instructs (1)
insurance (1)
intend (1)
intending (2)
intensive (1)
intent (21)
intents (1)
interact (1)
interaction (2)
interactions (5)
interest (14)
interested (3)
internal (1)
interpret (2)
interrupt (1)
introduce (1)
introduced (26)
invited (1)
invoked (2)
involve (1)
involved (16)

involvement (2)
involving (1)
Irvin (4)
island (1)
Islander (2)
isolated (1)
issue (4)
issues (6)
items (2)
iteration (2)
iterations (13)
its (14)

< J >
January (2)
Jcusick@naacpldf.org
(1)
Jennifer (3)
job (8)
jogs (1)
JOHN (5)
Johnson (23)
Joi (2)
join (1)
Jordan (2)
Joseph (1)
Josh (1)
jot (1)
judge (1)
judgment (1)
July (6)
jump (10)
June (2)
justify (1)
Justin (2)
Justin.brascher@arka
nsasag.gov (1)
Jwong@naacpldf.org
(1)

< K >
keep (6)
Kennebrew (1)
Kenneth (1)
kept (3)
Kevin (1)
kind (22)
kinds (2)
knew (21)

know (202)
knowing (1)
knowingly (1)
knowledge (17)
knows (1)

< L >
labeled (1)
lack (1)
Laden@naacpldf.org
(1)
Ladyman (6)
Lake (1)
lakes (1)
land (1)
language (13)
laptop (3)
laptops (1)
large (3)
largely (1)
late (7)
Law (34)
lawsuit (5)
lawsuits (1)
layer (2)
layers (1)
LDF (1)
lead (1)
leaders (1)
leading (3)
Leah (6)
learn (1)
learned (3)
learner (1)
learning (2)
leave (3)
leaving (1)
led (1)
Leding (1)
Lee (1)
leeway (2)
left (9)
left-hand (1)
Legal (81)
legislation (40)
LEGISLATIVE (79)
legislator (108)
legislators (72)
legislator's (1)

legislature (23)
length (1)
Leonard (3)
letter (2)
level (32)
levels (3)
LEXIS (1)
light (2)
liked (1)
likewise (1)
limestone (2)
limitations (1)
limited (1)
line (19)
lines (22)
link (1)
LinkedIn (2)
list (3)
listed (1)
listen (1)
listening (2)
LISTSERV (1)
litigant (2)
litigation (20)
Little (18)
live (6)
lived (7)
LLP (2)
load (1)
loaded (8)
loading (1)
lobbyist (4)
located (1)
locked (1)
log (1)
logistical (1)
long (14)
longer (1)
long-running (1)
look (26)
looked (13)
looking (47)
looks (10)
Lori (16)
Lorie (1)
lost (2)
lot (10)
Love (8)
Loyd (2)

LS (1)
lunch (3)
Lynette (1)

< M >
ma'am (8)
Mable (1)
machine (3)
macros (1)
maiden (1)
main (1)
maintain (1)
maintained (3)
maintaining (1)
maintains (1)
major (1)
Majority (3)
majority-minority (3)
maker (1)
makeup (4)
making (16)
Management (1)
manner (3)
manners (1)
manual (2)
manuals (1)
map (324)
mapmaking (19)
mapping (6)
maps (233)
map-specific (1)
mark (31)
MARKED (37)
marker (1)
marking (6)
Marty (2)
match (1)
materials (5)
matter (14)
matters (5)
Matthew (14)
Matthew's (1)
mean (28)
Meaning (4)
means (15)
meant (5)
measure (1)
measures (2)
mechanics (1)

media (2)
Meeks (5)
meet (7)
meeting (33)
meetings (24)
member (87)
member-related (1)
members (82)
member's (7)
membership (4)
memory (2)
mentioned (28)
merge (1)
met (5)
metadata (1)
metes (3)
methods (6)
mhartz (2)
mhartzdavenport (3)
Michael (2)
MICHELLE (8)
Michelle's (1)
microimage (1)
mid (1)
middle (3)
midst (1)
Miller (16)
Millsap (1)
mind (12)
mine (2)
minimal (1)
MINISTERIAL (3)
minority (8)
minutes (3)
Mississippi (2)
Mitchell (6)
MLD (3)
mobilized (1)
module (2)
moment (1)
Monday (3)
month (2)
morning (5)
mountain (4)
mountains (3)
move (9)
moved (12)
movements (1)
moving (8)

Mskocpol@naacpldf.org (1)
muddy (1)
multiple (22)
Mx (4)
Myers (3)

< N >
NAACP (2)
name (31)
named (5)
names (7)
naming (2)
narrative (2)
National (1)
nations (1)
nationwide (1)
Native (2)
naturally (1)
nature (10)
NCLS (1)
NCSL (13)
near (1)
nebulous (1)
necessarily (8)
necessary (2)
need (20)
needed (8)
needs (1)
neither (1)
NEPA (1)
network (1)
never (7)
New (9)
Newport (2)
nice (2)
nodding (1)
non-BLR (5)
nonlegislative (2)
nonlegislator (5)
nonlegislators (1)
nonpartisan (6)
nonparty (1)
Northwest (3)
note (6)
notebook (2)
noted (2)
notes (2)
notice (4)

noticed (1)
number (31)
numbered (1)
numbers (24)
NW (1)
NY (1)

< O >
oath (1)
object (45)
objection (15)
objections (1)
obligations (3)
observing (1)
obstructing (1)
obtained (1)
occasion (11)
Occasionally (2)
occasions (1)
occupied (1)
occur (1)
occurred (5)
October (1)
offer (2)
offered (3)
offering (2)
Office (28)
officers (1)
official (13)
officially (2)
officials (1)
oftentimes (1)
oh (1)
Okay (222)
O'Melveny (3)
once (1)
one-day (1)
one-on-one (1)
one-page (1)
one-person (1)
ones (21)
one-time (3)
one-vote (1)
online (3)
open (6)
opening (1)
operate (1)
operating (2)
opinion (1)

opportunity (2)	percentage (1)	possibly (1)	privy (1)
option (3)	percentages (1)	post (4)	pro (3)
ORAL (3)	Perfect (2)	post-2020 (2)	probably (8)
orange (1)	perfectly (1)	potential (1)	problems (2)
order (35)	perform (2)	potentially (12)	Procedure (2)
organizational (1)	performance (6)	PowerPoint (10)	Procedures (1)
organize (1)	performed (3)	PowerPoints (1)	proceed (1)
origin (3)	period (7)	practical (2)	proceeding (1)
original (23)	permission (1)	practice (9)	PROCEEDINGS (3)
originally (3)	person (43)	practicing (6)	process (56)
originated (4)	personal (21)	precinct (34)	processes (3)
Ouachita (3)	personally (1)	precincts (30)	processing (1)
outcome (1)	persons (4)	predicate (1)	procurement (1)
outline (2)	person's (1)	predrafts (1)	produce (6)
outreach (1)	perspective (1)	preference (1)	produced (13)
outside (32)	phone (27)	preferential (1)	producing (19)
overall (2)	phones (1)	preferred (1)	product (4)
overlay (1)	phrased (1)	preliminary (1)	production (1)
overly (1)	physical (3)	preparation (13)	professional (7)
overview (4)	pick (1)	prepare (19)	professionally (1)
Ozark (1)	piece (16)	prepared (14)	professor (1)
Ozarks (3)	pieces (9)	preparing (17)	profile (3)
< P >	place (9)	present (10)	program (16)
p.m (7)	places (1)	presentation (16)	programs (1)
P100449 (2)	plain (1)	presentations (2)	progressed (1)
PAGE (11)	plainly (1)	presented (10)	project (1)
pages (8)	PLAINTIFF (4)	presenting (1)	projects (1)
paired (1)	PLAINTIFFS (7)	preservation (3)	proper (1)
pairing (1)	plan (1)	preserve (1)	proposal (1)
paper (4)	plans (1)	preserved (1)	proposals (1)
parallel (2)	platforms (2)	presidential (2)	propose (1)
part (38)	please (12)	presnapshot (1)	proposed (33)
participate (1)	plotter (10)	pretty (1)	proposing (3)
participating (1)	plotting (1)	previous (12)	propounded (1)
participation (1)	Plugging (1)	previously (7)	protect (3)
particular (121)	plus (1)	primarily (11)	protected (3)
particularly (3)	point (51)	primary (4)	provide (35)
parties (8)	points (13)	principle (1)	provided (37)
partisan (6)	policies (2)	principles (4)	provider (1)
parts (3)	policy (12)	print (2)	provides (1)
party (11)	political (36)	printed (8)	providing (12)
Patricia (1)	populated (1)	printer (2)	provisions (1)
Pavel (1)	population (62)	printing (1)	public (14)
Payton (4)	populations (8)	prior (12)	Pulaski (8)
PDF (1)	portion (4)	priorities (2)	pull (4)
PDFs (2)	portions (1)	privacy (1)	pulled (8)
people (23)	posed (5)	private (1)	pulling (2)
percent (7)	position (16)	privilege (64)	purely (1)
	possible (7)	privileged (9)	purple (1)

purporting (1)
purpose (4)
purposes (6)
pursuant (1)
pursue (1)
purview (2)
push (1)
put (19)
putting (5)

< Q >

question (71)
questioned (1)
questioning (1)
questions (23)
quickly (3)
quote (2)

< R >

race (4)
racial (88)
racked (1)
raise (3)
raised (1)
raising (1)
ran (7)
range (7)
ranges (2)
ranked (5)
ranking (1)
Rapert (5)
rationales (1)
Ray (6)
Rd (1)
reach (2)
reached (2)
reaching (1)
read (17)
reading (5)
reads (1)
ready (2)
real (1)
reality (1)
realize (1)
realized (1)
really (7)
realtime (3)
real-time (1)
reask (4)

reason (10)
reasons (9)
rebalance (2)
rebalanced (1)
rebalancing (3)
recall (422)
recalling (1)
receive (26)
received (30)
receiving (15)
Recess (4)
recognize (27)
recollection (13)
recommendation (1)
reconfigure (1)
record (30)
recorded (5)
recording (3)
recordings (2)
records (6)
recreate (1)
recreated (1)
Rector (1)
Red (6)
redistrict (1)
redistricting (117)
redraw (4)
redrawing (3)
redrawn (1)
reduce (1)
refer (3)
reference (1)
referenced (3)
references (1)
referencing (3)
referred (2)
referring (13)
reflect (5)
reflected (3)
reflecting (1)
reflects (4)
refrain (1)
regard (1)
regarding (4)
regardless (2)
region (1)
regions (2)
regular (1)
regularly (2)

Regulations (1)
reiterate (1)
related (27)
relates (1)
relating (1)
relation (10)
relationship (2)
relative (1)
relatively (1)
relevant (1)
relied (1)
relinquish (1)
reloading (1)
remain (1)
remains (2)
remember (98)
removed (2)
repeat (1)
rephrase (4)
replicated (1)
replicating (1)
Report (43)
reported (5)
Reporter (9)
reporting (3)
reports (46)
represent (11)
representation (8)
representations (14)
Representative (145)
representatives (1)
represented (3)
representing (2)
reproduce (1)
Republican (3)
request (83)
requested (25)
requester (2)
requesting (2)
requests (15)
require (1)
required (5)
requirement (3)
requirements (5)
requires (2)
RESEARCH (29)
researched (2)
resolved (1)
resource (3)

resources (1)
respect (29)
respecting (1)
respective (1)
respond (5)
responded (1)
responding (4)
response (5)
responses (2)
responsibilities (2)
responsibility (6)
responsible (4)
responsive (2)
rest (1)
restating (1)
restroom (1)
result (2)
results (6)
resumed (1)
retained (1)
retainer (1)
returning (1)
reveal (9)
revealing (2)
reveals (1)
review (7)
reviewed (8)
reviewing (1)
Revised (2)
Richard (1)
Ridge (1)
right (10)
right-hand (5)
rights (1)
rights-related (1)
ring (1)
River (1)
rivers (1)
RMR (2)
Rock (6)
role (11)
roll (2)
room (65)
rooms (2)
round (2)
routed (1)
row (10)
rule (3)
Rules (9)

run (13)	section (3)	sides (2)	special (3)
running (11)	sections (3)	sign (1)	specialized (3)
< S >	see (37)	signature (2)	specific (70)
S44 (1)	seeing (7)	signed (1)	specifically (44)
Salt (1)	seeking (3)	significant (6)	specifics (5)
San (1)	seen (4)	sign-in (2)	speculate (2)
sandstone (1)	selected (2)	signing (1)	speculation (5)
Sarah (2)	Selig (1)	similar (12)	spelling (1)
sat (1)	seminar (1)	similarities (1)	spend (1)
satisfies (1)	Senate (48)	similarly (3)	spending (1)
satisfy (1)	Senator (98)	simple (2)	sphere (1)
save (11)	senator's (1)	simpler (1)	spinning (1)
saved (21)	send (8)	simply (12)	split (10)
saving (1)	sending (1)	simultaneous (1)	splits (2)
saw (5)	sense (9)	single (4)	spoke (8)
saying (5)	sent (14)	sit (11)	sponsor (2)
says (12)	separate (17)	site (1)	sponsored (1)
SB (9)	separately (4)	situation (2)	sponsors (4)
SB28 (1)	September (1)	situations (1)	sprint (1)
SB720 (13)	series (1)	six (2)	stable (1)
SB721 (6)	seriously (1)	six-page (1)	stack (1)
SB722 (3)	serve (1)	size (1)	staff (44)
SB723 (5)	served (1)	skin (1)	staffers (1)
SB724 (1)	service (2)	Skocpol (3)	stage (1)
SB725 (15)	services (3)	slightly (1)	stamp (6)
SB726 (9)	serving (2)	small (1)	stand (1)
SB727 (9)	session (26)	smaller (1)	standard (10)
SB728 (12)	sessions (1)	smallest (1)	start (14)
SB729 (7)	set (10)	Smith (1)	started (16)
SB741 (3)	setting (1)	snapshots (5)	starting (8)
SB742 (4)	setup (1)	social (3)	State (44)
SB743 (3)	shady (1)	software (24)	stated (1)
SB744 (3)	shaking (1)	sole (2)	state-filed (1)
scheduled (1)	shape (2)	solely (12)	state-level (1)
scheme (2)	share (28)	somewhat (1)	statement (4)
school (6)	shared (16)	sorry (14)	statements (2)
science (5)	sharing (1)	sort (3)	STATES (7)
scratch (3)	sheet (7)	sought (2)	State's (1)
screen (30)	Shelby (3)	sound (1)	stating (1)
screenshot (2)	shorthand (1)	Sounds (3)	station (1)
Scrivener (3)	short-term (1)	source (9)	stationed (1)
seal (1)	show (9)	sources (3)	statistics (1)
search (1)	showed (2)	southeast (1)	statute (3)
searchable (1)	showing (2)	Southern (1)	statutes (1)
searching (2)	shown (3)	spare (1)	statutory (4)
Sebastian (3)	shows (2)	speak (15)	stayed (1)
second (8)	shut (1)	speaker (1)	STENOGRAPHER
Secretary (3)	sic (4)	speaking (14)	(1)
	side (4)	speaks (60)	stenography (1)

step (1)
stepping (1)
steps (1)
sticker (2)
Stipulations (1)
stood (1)
stop (8)
stopped (2)
stored (3)
streamline (1)
Street (4)
strength (1)
strictly (1)
strike (8)
strike-through (1)
strike-throughs (2)
strike-
throughs/changes (1)
strong (1)
structure (1)
stuck (1)
studied (2)
studies (2)
study (8)
studying (4)
Stuttgart (1)
sub (1)
subcolumn (1)
subdivisions (1)
subject (11)
submitted (2)
subpoena (2)
subpoenaed (1)
subsequent (4)
subsequently (1)
subset (1)
substance (1)
substantial (1)
suggesting (1)
suggests (2)
Suite (4)
summary (3)
summer (1)
supervision (1)
supervisor (2)
support (3)
supposed (2)
sure (27)
Survey (1)

swap (1)
sworn (3)
system (9)
systems (5)
< T >
table (9)
tactical (1)
take (21)
taken (5)
talk (6)
talked (6)
talking (15)
talks (1)
Talley (169)
target (1)
task (1)
tasked (2)
Taylor (2)
teachings (2)
team (1)
technical (14)
technically (1)
telephone (5)
tell (23)
telling (6)
tells (1)
template (6)
ten (4)
tendency (1)
term (6)
terms (6)
terrain (1)
terribly (1)
Terry (1)
testified (5)
testifying (2)
testimony (17)
tests (1)
Texarkana (1)
text (19)
texts (1)
textual (1)
Thank (26)
thick (1)
thing (8)
things (16)
think (47)
thinking (3)

third (4)
third-party (1)
Thornton (1)
thought (2)
thoughts (1)
three (6)
throw (1)
thumb (8)
THURSTON (3)
ticker (15)
tie (2)
tied (4)
ties (1)
tight (1)
tighter (1)
tightly (1)
TikTok (3)
timberlands (1)
time (66)
timeline (3)
times (14)
timing (3)
title (2)
titled (2)
today (30)
today's (9)
told (10)
tool (1)
top (13)
topics (1)
Tosh (6)
total (16)
totally (1)
touch (2)
touched (2)
touching (1)
town (2)
traditional (1)
traditionally (1)
training (22)
trainings (6)
transcribed (1)
transcribing (1)
transcript (4)
transcription (2)
transcripts (1)
translate (1)
translated (1)
transmission (1)

transmit (1)
transmitted (4)
Transportation (3)
treat (1)
treated (4)
treatment (1)
tree (1)
trick (1)
tried (3)
true (3)
truly (3)
Trust (1)
truth (1)
truthfully (2)
try (6)
trying (15)
Tucker (10)
Tucker's (1)
Tudor (1)
turn (6)
turned (6)
turning (2)
Two (28)
type (32)
typed (1)
types (5)
typical (1)
typically (2)
< U >
U.S (2)
UALR (1)
ultimately (4)
unable (2)
unallowable (1)
unavailable (1)
un-Bates-stamped (1)
undergraduate (1)
underline (1)
underlined (1)
underlines (2)
underlying (1)
underneath (1)
understand (66)
understanding (29)
understood (14)
uniform (3)
uniformly (1)
unique (2)

unit (1)
UNITED (1)
universally (2)
University (2)
unsure (2)
updated (4)
updates (1)
updating (1)
uploaded (2)
urban (1)
usage (1)
use (30)
usher (1)
ushering (2)
usually (1)
utilize (1)
utilized (1)

< V >
Vaguely (2)
vaguest (1)
Valley (1)
variance (5)
variances (1)
variations (1)
variety (1)
various (5)
Velma (1)
verbal (2)
verbally (10)
verbatim (1)
verified (1)
versa (1)
version (14)
versions (2)
versus (7)
vice (1)
video (2)
videoconference (4)
view (4)
viewed (3)
virtual (3)
virtually (5)
visit (4)
visited (1)
visual (2)
visually (2)
voicemail (1)
voicemails (1)

vote (1)
voted (5)
voters (1)
voting (5)
VS (1)

< W >
waive (3)
waived (4)
walk (3)
want (43)
wanted (37)
Washington (3)
watch (3)
watched (7)
watching (3)
water (2)
way (34)
ways (4)
Webinars (1)
website (9)
weeks (2)
well (29)
well-settled (1)
went (17)
we're (13)
West (3)
Westlaw (2)
we've (8)
Wheeler (4)
Wheeler's (1)
wheels (1)
whichever (2)
Whitaker (10)
White (6)
William (2)
Williams (8)
Windows-based (1)
wished (1)
withdraw (1)
withheld (2)
witness (104)
witness's (1)
wondering (1)
Wong (1)
Woodyard (1)
Word (3)
words (1)
work (80)

workday (1)
worked (109)
working (117)
workroom (2)
worries (1)
wrap (2)
wrestling (1)
write (1)
writing (3)
written (7)
wrong (3)
www.ArkansasRealtim
eReporting.com (1)

< Y >
Yeah (1)
year (6)
years (3)
yesterday (8)
York (1)

< Z >
zoom (1)
zoomed (2)