

EXHIBIT 35

Soto Palmer, et al.,
v.
Hobbs, et al.

* * * * *

Deposition Upon Oral Examination of
Osta Davis
August 19, 2022

* * * * *

REPORTED BY:
LAKESIDE REPORTING
Jeanne M. Gersten, RDR, CCR 2711
(833) 365-3376
Jeanne@LakesideReporting.com
Contact@LakesideReporting.com

Osta Davis

August 19, 2022

Page 1	Page 2
<p>UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON</p> <hr/> <p>SUSAN SOTO PALMER, et al.,) Plaintiffs,) v.) STEVEN HOBBS, in his official) capacity as Secretary of State) of Washington, and the STATE OF) WASHINGTON,) No. 3:22-cv-05035-RSL Defendants,) and) JOSE TREVINO, ISMAEL G. CAMPOS,) and State Representative) ALEX YBARRA,) Intervenor-Defendants.)</p> <hr/> <p>DEPOSITION UPON ORAL EXAMINATION OF OSTA DAVIS</p> <hr/> <p>Friday, August 19, 2022 9:10 a.m. to 5:50 p.m.</p> <p>Office of the Attorney General 1250 Pacific Avenue Tacoma, Washington</p> <p>REPORTED BY: LAKESIDE REPORTING Jeanne M. Gersten, RDR, CCR 2711 Registered Diplomat Reporter (833) 365-3376 Jeanne@LakesideReporting.com Contact@LakesideReporting.com</p>	<p>1 APPEARANCES: 2 FOR THE WITNESS, OSTA DAVIS: 3 JESSICA L. GOLDMAN 4 SUMMIT LAW GROUP 5 315 Fifth Avenue South, Suite 1000 6 Seattle, Washington 98104-2682 7 JessicaG@SummitLaw.com</p> <p>8 FOR PLAINTIFFS SOTO PALMER, et al., 9 on behalf of CAMPAIGN LEGAL CENTER: 10 SIMONE LEEPER (via Zoom) 11 ANNABELLE HARLESS (via Zoom) 12 ASEEM MULJI (via Zoom) 13 CAMPAIGN LEGAL CENTER 14 1101 14th Street Northwest, Suite 400 15 Washington, DC 20005 16 SLeeper@CampaignLegalCenter.org 17 AHarless@CampaignLegalCenter.org 18 AMulji@CampaignLegalCenter.org</p> <p>19 For Plaintiffs on behalf of UCLA VOTING RIGHTS PROJECT: 20 SONNI WAKNIN (via Zoom) 21 BERNADETTE REYES (via Zoom) 22 UCLA Voting Rights Project 23 3250 Public Affairs Building 24 Los Angeles, California 90095 25 Sonni@UCLAVRP.org Bernadette@UCLAVRP.org</p> <p>For Plaintiffs on behalf of MALDEF: ERNEST HERRERA DEYLIN THRIFT-VIVEROS Mexican American Legal Defense and Educational Fund (MALDEF) 634 South Spring Street, 11th Floor Los Angeles, California 90014 EHerrera@MALDEF.org DThrift-Viveros@MALDEF.org</p> <p>(Continued on next page)</p>
Page 3	Page 4
<p>1 APPEARANCES, continued: 2 For Plaintiffs, on behalf of MORFIN LAW FIRM: 3 EDUARDO MORFIN (via Zoom) 4 MORFIN LAW FIRM, PLLC 5 7325 West Deschutes Avenue, Suite A 6 Kennewick, Washington 99336 7 Eddie@MorfinLawFirm.com</p> <p>8 FOR DEFENDANT STATE OF WASHINGTON: 9 ANDREW R.W. HUGHES (via Zoom) 10 CRISTINA SEPE (via Zoom) 11 ERICA FRANKLIN 12 Assistant Attorneys General 13 ATTORNEY GENERAL OF WASHINGTON 14 Complex Litigation Division 15 800 Fifth Avenue, Suite 2000 16 Seattle, Washington 98104 17 Andrew.Hughes@ATG.Wa.gov 18 Cristina.Sepe@ATG.Wa.gov 19 Erica.Franklin@ATG.Wa.gov</p> <p>20 FOR INTERVENOR-DEFENDANTS: 21 DALLIN HOLT (via Zoom) 22 HOLTZMAN VOGEL 23 15405 John Marshall Highway 24 Haymarket, Virginia 20169-2706 25 DHolt@HoltzmanVogel.com</p> <p>*****</p>	<p>1 EXAMINATION INDEX 2 OSTA DAVIS PAGE 3 By Mr. Thrift-Viveros 7 4 By Ms. Franklin 211 5 By Mr. Holt 229 6 ***** 7 8 E X H I B I T S 9 NUMBER DESCRIPTION INTRODUCED 10 1 Email 10/19/21 to April Sims 104 11 from Osta Davis re Latest Draft, 12 V4 Possible Draft 2, 10/19/21 13 2 Emails 10/22/21 with Dominique 124 14 Meyers, April Sims, Osta Davis 15 and Matt Bridges re Apologies 16 3 Email 10/25/21 to April Sims and 149 17 Dominique Meyers re Statement with 18 attached Values in Action 19 4 Email 10/25/21 to April Sims from 152 20 Osta Davis re Most Updated Map, 21 attached V5 10/22/21 22 5 Emails 11/2/21 with Kurt Fritts, 155 23 April Sims and Osta Davis re 24 Map w/new E. WA District, 25 attached 11/10/21 Proposal</p> <p>6 Email 11/4/21 to April Sims and 160 Dominique Meyers from Osta Davis re New 14th, attached 14th LD</p> <p>7 Emails 11/12/21 with April Sims, 164 Brady Walkinshaw, Ali O'Neil re Fwd: Updated Proposal Email, attached 11/12 Map</p> <p>(Continued on next page)</p>

1 (Pages 1 to 4)

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

Osta Davis

August 19, 2022

Page 5				Page 6			
1	NUMBER	DESCRIPTION	INTRODUCED	1	NUMBER	DESCRIPTION	INTRODUCED
2	8	Emails 11/14/21 with Osta Davis, April Sims, Dominique Meyers, Adam Hall, Kamau Chege re Scheduling a Meeting with Matt Barreto today	169	2	18	The Supreme Court of Washington Order Regarding the Washington State Redistricting Commission's Letter to the Supreme Court on November 15, 2021 and the Commission Chair's November 21, 2021 Declaration	233
3				3			
4	9	Emails 11/13/21 with Anton Grose, Paul Graves, April Sims re Map Proposal	176	4			
5				5			
6	10	Memo 11/21/21 to Senate Majority Leader Andy Billig from Ali O'Neil, SDC Staff Member, re Timeline of Redistricting Commission Events	182	6	19	Washington Constitution Article II, Section 43 on Redistricting	236
7				7			
8	11	Emails 11/15/21 with Osta Davis, April Sims, Dominique Meyers and Chris Kilduff re FW: Redistricting Memo, with attached Memo 11/15/21 to Dom Meyers from Chris Kilduff re Court-Adopted Redistricting Plan	187	8			
9				9			
10				10			
11				11			
12	12	Emails 11/15/21 with Ali O'Neil and Osta Davis re FW R Map Proposal with attached Copy of Copy of Copy of R Prop Rebalanced	197	12			
13				13			
14	13	Email 11/15/21 to April Sims from Osta Davis re MAP, with attached Copy of Copy of 11/14 7:30 PM Merged D Map - LD	201	14			
15				15			
16				16			
17	14	Email 3/25/21 to April Sims from Osta Davis re a Couple of Things	213	17			
18				18			
19	15	MGGG Article January, 2020, "Analysis of County Commission Elections in Yakima County"	217	19			
20				20			
21	16	Printout of Matt Barreto Slides	220	21			
22	17	Email 3/25/21 to Lisa McLean and Lisa Biscay from Sarah Augustine re FW: Job Descriptions and Budget Items	223	22			
23				23			
24				24			
25		(Continued on next page)		25			
Page 7				Page 8			
1	August 19, 2022, Tacoma, Washington:			1	Yeah, I'll just talk about the plaintiffs' counsel.		
2	PROCEEDINGS: 9:10 a.m.			2	So Ernest Herrera from MALDEF, also. Sonni Wakinin		
3	(Zoom conferencing set up with all participants.)			3	from UCLA Voting Rights Project is on Zoom. So is		
4	OSTA DAVIS,			4	Simone Leeper from the Campaign Legal Center, also		
5	having been sworn/affirmed on oath to tell the truth, the			5	Annabelle Harless from Campaign Legal Center and		
6	whole truth, and nothing but the truth, testified as			6	Aseem Mulji from Campaign Legal Center. And also		
7	follows:			7	Eddie Morfin from his own office.		
8	E X A M I N A T I O N			8	And --		
9	BY MR. THRIFT-VIVEROS:			9	MS. FRANKLIN: My name is Erica Franklin.		
10	Q	Hi. Good morning, Osta.		10	I represent the State of Washington. And my colleague,		
11		Do you prefer that I call you Osta or Ms. Davis?		11	Andrew Hughes, also from the Attorney General's Office, is		
12	A	Osta works.		12	on the Zoom, and my colleague Cristine Sepe will be		
13	Q	Okay. Great. My name is Deylin Thrift-Viveros. I'm		13	joining us shortly.		
14		an attorney with the Mexican American Legal Defense		14	MS. GOLDMAN: Good morning. I'm Jessica		
15		Educational Fund, also known as MALDEF. We are		15	Goldman. I'm a Special Assistant Attorney General from		
16		representing the plaintiffs in the Soto Palmer v. Hobbs		16	the Summit Law Group, and I represent the witness.		
17		litigation.		17	MR. HOLT: Good morning. My name is		
18		Are you familiar with the lawsuit?		18	Dallin Holt. I'm with Holtzman Vogel, and I'm here on		
19	A	Yes.		19	behalf of the intervenor defendants.		
20	Q	Okay. What do you know about it?		20	MR. THRIFT-VIVEROS: Dallin, is anyone else		
21	A	I read the Complaint.		21	from intervenor defendants joining?		
22	Q	Okay. So in the room and on Zoom are other parties		22	MR. HOLT: No, it will just be myself.		
23		and counsel. I'll identify each attorney and who they		23	MR. THRIFT-VIVEROS: Okay. Great.		
24		represent.		24	Q	(By Mr. Thrift-Viveros) So I'd just like to go over	
25		So in person Ernest Herrera. I'll represent --		25		a few ground rules just so we're on the same page when we	

2 (Pages 5 to 8)

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

Osta Davis

August 19, 2022

Page 9	Page 10
<p>1 start this deposition.</p> <p>2 I'm going to be asking questions. All I ask is that</p> <p>3 we be mindful of not talking over each other. That makes</p> <p>4 it easier to get a clear record. So basically the process</p> <p>5 is going to go I'm going to ask you questions. Your</p> <p>6 counsel, she may object, and usually it's to preserve an</p> <p>7 objection for the record later; but generally you're going</p> <p>8 to have to answer the question afterwards.</p> <p>9 If she says, "Please do not answer this question"</p> <p>10 because of a privilege or something like that, then don't</p> <p>11 answer the question. Simple as that. And based on your</p> <p>12 answers I might ask some followup questions, so we'll just</p> <p>13 have to be very mindful of not speaking over each other.</p> <p>14 Let's see. Also, yeah, the court reporter, she can</p> <p>15 only record verbal responses, so it's important that you</p> <p>16 answer out loud with words. You know, not shaking your</p> <p>17 head, nodding, those. Generally I will ask you to say yes</p> <p>18 or no or answer the question.</p> <p>19 If you don't understand a question for any reason,</p> <p>20 please tell me. I'll try to clarify it; but if you do</p> <p>21 answer a question, I'll assume that you've understood it.</p> <p>22 Does that make sense?</p> <p>23 A That does make sense.</p> <p>24 Q Great. And just let me know if at any point you</p> <p>25 need a break. We're going to take a lunch break. We'll</p>	<p>1 probably take other smaller breaks, but for whatever</p> <p>2 reason, let me know.</p> <p>3 I only ask that you finish responding to my question</p> <p>4 if it's in the middle of it, or if you're in the middle of</p> <p>5 an answer that you complete your answer.</p> <p>6 A (Nodded.)</p> <p>7 Q Great. So today we're here to discuss the</p> <p>8 Redistricting Commission process, the decisions that were</p> <p>9 made throughout it; and just to be clear, --</p> <p>10 MR. HOLT: Deylin, if you don't -- If you</p> <p>11 don't mind, just to go on the record real fast.</p> <p>12 MR. THRIFT-VIVEROS: Yes.</p> <p>13 MR. HOLT: For purposes of objections, we</p> <p>14 talked before going on the record just so we don't have</p> <p>15 everyone objecting all the time, an objection made by the</p> <p>16 State or counsel for the witness or intervenor-defendants</p> <p>17 regarding a question would suffice for all parties, as</p> <p>18 opposed to having everyone have to object separately.</p> <p>19 That was something we had agreed to beforehand.</p> <p>20 If anyone disagrees with that, please speak up.</p> <p>21 MS. GOLDMAN: We're in agreement with that.</p> <p>22 Thank you.</p> <p>23 MS. FRANKLIN: The State is in agreement as</p> <p>24 well. Thank you.</p> <p>25 MR. THRIFT-VIVEROS: And we're in agreement</p>
Page 11	Page 12
<p>1 with that. Thanks.</p> <p>2 Sorry. Let me -- I'm getting distracted by my own</p> <p>3 image, so I'll turn the video off.</p> <p>4 Q (By Mr. Thrift-Viveros) So just to be clear, in this</p> <p>5 litigation you're not a defendant. There are no claims</p> <p>6 against you. We're taking the depositions of</p> <p>7 commissioners and aides to get a better sense of how the</p> <p>8 maps were created, specifically the legislative maps, and</p> <p>9 the processes and metrics that were used in creating these</p> <p>10 maps.</p> <p>11 So in the State of Washington's initial disclosures</p> <p>12 you were identified as someone familiar with the</p> <p>13 information received and considered by the Redistricting</p> <p>14 Commission and the commissioners' assessment of</p> <p>15 alternative and draft map configurations.</p> <p>16 Would you agree with this description?</p> <p>17 A Yes.</p> <p>18 Q Okay. And you understand that all your responses</p> <p>19 are being recorded?</p> <p>20 A I do.</p> <p>21 Q Okay. And so then later on after the transcript has</p> <p>22 been prepared you'll have an opportunity to review your</p> <p>23 answers in a physical booklet, make any changes you deem</p> <p>24 appropriate, and then you'll sign it under penalty of</p> <p>25 perjury.</p>	<p>1 However, if you make more than just fixing some</p> <p>2 typos, I or another plaintiffs' lawyer or another lawyer</p> <p>3 may look and make comments on your changes at trial, which</p> <p>4 could affect credibility before the judge or a jury.</p> <p>5 So I just ask that you give the best testimony you</p> <p>6 can here today.</p> <p>7 A I'll do my best.</p> <p>8 Q So although we're in a somewhat informal environment</p> <p>9 today, the oath that you took with the court reporter has</p> <p>10 the same force and effect as if you were testifying in a</p> <p>11 court of law in front of a judge or a jury.</p> <p>12 Do you understand that?</p> <p>13 A I do.</p> <p>14 Q Okay. The court reporter will take down everything</p> <p>15 you say, anything anyone else says, unless we go off the</p> <p>16 record.</p> <p>17 So is there anything that will prevent you from</p> <p>18 giving me your full attention today? For example, are you</p> <p>19 taking any medication that might affect your ability to</p> <p>20 testify?</p> <p>21 A No.</p> <p>22 Q Okay. Are you prepared to answer my questions</p> <p>23 today?</p> <p>24 A I am.</p> <p>25 Q Okay. And yeah, again, if you don't understand a</p>

3 (Pages 9 to 12)

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

Osta Davis

August 19, 2022

Page 13	Page 14
<p>1 question, just tell me that you don't understand, and I'll</p> <p>2 try to rephrase it in a way that is more helpful.</p> <p>3 And yeah, if you don't know the answer to a</p> <p>4 question, you can say so. We're entitled to your informed</p> <p>5 estimate for like dates or, you know, order of things that</p> <p>6 happened, but I don't want you to guess.</p> <p>7 So if you don't know the answer to a question you</p> <p>8 can simply say so, but otherwise I would like an informed</p> <p>9 estimate, if you can remember the order of things or, you</p> <p>10 know, vaguely what month something happened in, something</p> <p>11 like that.</p> <p>12 Also, it might happen that you give an answer as</p> <p>13 completely as you can in that moment, and then later on</p> <p>14 you remember some more information or maybe some</p> <p>15 clarification of like a previous response. So if that</p> <p>16 happens, please tell me you'd like to add something to</p> <p>17 your previous response, and then we'll do it right then</p> <p>18 while it's still fresh in your mind.</p> <p>19 So have you ever been deposed before?</p> <p>20 A I have.</p> <p>21 Q Okay. In connection with what?</p> <p>22 A The Redistricting Commission.</p> <p>23 Q Okay. And was that -- What litigation was that for?</p> <p>24 A The Open Public Meetings Act.</p> <p>25 Q Okay. And have you ever been a party to a lawsuit?</p>	<p>1 A No.</p> <p>2 Q Okay. So to prepare for this depo, deposition, did</p> <p>3 you meet in person, by phone or Zoom with anyone --</p> <p>4 A Yes.</p> <p>5 Q -- to prepare?</p> <p>6 Okay. With who?</p> <p>7 A My counsel.</p> <p>8 Q Okay. With anyone else?</p> <p>9 A No.</p> <p>10 Q Did you -- Excuse me. Did you discuss this</p> <p>11 deposition with anyone else besides your counsel?</p> <p>12 A Yes.</p> <p>13 Q Okay. With who?</p> <p>14 A My significant other.</p> <p>15 Q Okay. I don't want to pry too much into details,</p> <p>16 but is your significant other involved in the commission</p> <p>17 at all?</p> <p>18 A No.</p> <p>19 Q Okay. And what does your significant do for work?</p> <p>20 A Pediatrician.</p> <p>21 Q And who is your counsel? Who is representing you?</p> <p>22 A Jessica Goldman.</p> <p>23 Q Okay. Anyone else?</p> <p>24 A No.</p> <p>25 Q Have you retained -- You've not retained anyone else</p>
Page 15	Page 16
<p>1 for counsel?</p> <p>2 A I have not.</p> <p>3 Q Have you had any written communications with anyone</p> <p>4 besides your counsel to prepare for this deposition?</p> <p>5 A No.</p> <p>6 Q Did you review any documents in preparation for this</p> <p>7 deposition?</p> <p>8 A Yes.</p> <p>9 Q And what documents are those?</p> <p>10 A The Complaint.</p> <p>11 Q Okay. Anything else?</p> <p>12 A No.</p> <p>13 Q Okay. Were you asked to conduct any searches in</p> <p>14 connection with requests for information or production of</p> <p>15 documents related to this case?</p> <p>16 A I'm not sure.</p> <p>17 Q Okay. Were you asked to conduct any searches in</p> <p>18 connection with requests for information or production of</p> <p>19 documents related to the Garcia v. Hobbs lawsuit?</p> <p>20 A No, I don't believe so.</p> <p>21 Q So no one asked you to go back through your emails</p> <p>22 or cellphone records; do you recall?</p> <p>23 MS. GOLDMAN: Objection, vague.</p> <p>24 Q (By Mr. Thrift-Viveros) In relation to, you know, a</p> <p>25 records request or something like that.</p>	<p>1 MS. GOLDMAN: Objection, vague.</p> <p>2 A Ohad "Lowry" with the State Legislature periodically</p> <p>3 sends out emails; and I do not necessarily read them in</p> <p>4 their entirety, but he --</p> <p>5 MS. GOLDMAN: I'm going to --</p> <p>6 THE WITNESS: Oh.</p> <p>7 MS. GOLDMAN: -- stop you here.</p> <p>8 Mr. Lowry is a lawyer for the Legislature, and I'm</p> <p>9 going to instruct you not to answer as to any</p> <p>10 communications that were directed to you by Mr. Lowry.</p> <p>11 Q (By Mr. Thrift-Viveros) How do you spell Mr. Lowry's</p> <p>12 name; do you know?</p> <p>13 A Last name L-O-W-R-Y.</p> <p>14 MS. GOLDMAN: No, L-O-W-Y.</p> <p>15 THE WITNESS: Oh.</p> <p>16 MR. THRIFT-VIVEROS: Okay.</p> <p>17 MS. GOLDMAN: It's a tough one.</p> <p>18 Q (By Mr. Thrift-Viveros) And his first name?</p> <p>19 A O-H-A-D.</p> <p>20 Q Okay. And Mr. Lowry is an attorney for the</p> <p>21 Legislature or a specific House?</p> <p>22 MS. GOLDMAN: He is the lawyer for the</p> <p>23 House.</p> <p>24 MR. THRIFT-VIVEROS: For the House.</p> <p>25 For the House in general, or for --</p>

4 (Pages 13 to 16)

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

Osta Davis

August 19, 2022

Page 17	Page 18
<p>1 MS. GOLDMAN: Yes.</p> <p>2 MR. THRIFT-VIVEROS: -- one of the</p> <p>3 caucuses?</p> <p>4 MS. GOLDMAN: Yes, nonpartisan.</p> <p>5 Q (By Mr. Thrift-Viveros) In response to these records</p> <p>6 requests did you produce any documents?</p> <p>7 MS. GOLDMAN: I'm going to object. When</p> <p>8 you say "these records requests," to what do you refer, if</p> <p>9 you don't mind saying?</p> <p>10 MR. THRIFT-VIVEROS: So Osta mentioned that</p> <p>11 there were emails asking for records, I believe -- or</p> <p>12 perhaps I'm misstating what I understood.</p> <p>13 MS. GOLDMAN: Counsel, if I may suggest</p> <p>14 that you could reference a litigation-specific request,</p> <p>15 that would be helpful; because there are lot of requests</p> <p>16 for records that have --</p> <p>17 MR. THRIFT-VIVEROS: Right.</p> <p>18 MS. GOLDMAN: -- been served, and I think</p> <p>19 that might be the witness's confusion here.</p> <p>20 MR. THRIFT-VIVEROS: Yeah.</p> <p>21 MS. GOLDMAN: So I don't mean to intervene</p> <p>22 in your questioning, --</p> <p>23 MR. THRIFT-VIVEROS: No, that's fine.</p> <p>24 MS. GOLDMAN: -- but it is confusing.</p> <p>25 Q (By Mr. Thrift-Viveros) So I did ask for this</p>	<p>1 litigation; right, the Soto Palmer v. Hobbs.</p> <p>2 Did you receive requests to go through your emails,</p> <p>3 to go through your cellphone records?</p> <p>4 A No, I don't believe so.</p> <p>5 Q Okay. Did you receive requests to go through emails</p> <p>6 or cellphone records regarding redistricting for any other</p> <p>7 litigation?</p> <p>8 A Yes.</p> <p>9 Q Okay. And do you recall what litigation that was?</p> <p>10 A The litigation regarding the Open Public Meetings</p> <p>11 Act.</p> <p>12 Q And did you go through your emails and pull out</p> <p>13 specific ones for that?</p> <p>14 A I believe in the Legislature there is a designated</p> <p>15 public records officer who conducts the records search,</p> <p>16 retention, et cetera.</p> <p>17 Q And do you know that officer's name?</p> <p>18 A No.</p> <p>19 Q Okay. And do you know if they work for the</p> <p>20 Legislature as a whole or work for the House or the</p> <p>21 Senate?</p> <p>22 MS. GOLDMAN: Objection, calls for</p> <p>23 speculation. You can answer.</p> <p>24 Q (By Mr. Thrift-Viveros) If you know.</p> <p>25 A My understanding is the House.</p>
Page 19	Page 20
<p>1 Q Okay. When you were working on Redistricting</p> <p>2 Commission work did you send emails regarding the</p> <p>3 Redistricting Commission work from -- Sorry. Let me take</p> <p>4 that back.</p> <p>5 What email accounts did you use when you were</p> <p>6 working on the Redistricting Commission?</p> <p>7 MS. GOLDMAN: Objection, vague.</p> <p>8 Q (By Mr. Thrift-Viveros) What email accounts did you</p> <p>9 use to conduct Redistricting Commission work while you</p> <p>10 were doing Redistricting Commission work?</p> <p>11 A My legislative email.</p> <p>12 Q Okay. And what email is that?</p> <p>13 A Osta.Davis@Leg.Wa.Gov.</p> <p>14 Q At dot WA.</p> <p>15 A W-A.</p> <p>16 Q Did you use any other email addresses to conduct</p> <p>17 Redistricting Commission business while you were working</p> <p>18 on the Redistricting Commission?</p> <p>19 A Not to my recollection.</p> <p>20 Q So a personal email address that you have you didn't</p> <p>21 use to do Redistricting Commission work?</p> <p>22 MS. GOLDMAN: Objection, asked and</p> <p>23 answered.</p> <p>24 Q (By Mr. Thrift-Viveros) You can answer.</p> <p>25 A Not to my recollection. I may have unintentionally</p>	<p>1 received emails there, --</p> <p>2 Q Okay.</p> <p>3 A -- but my practice was to forward them to my</p> <p>4 legislative address and respond to anything through the</p> <p>5 legislative account.</p> <p>6 Q Okay. While you were working on the Redistricting</p> <p>7 Commission work did you do Redistricting Commission work</p> <p>8 on your cellphone, like text messages or --</p> <p>9 A Yes.</p> <p>10 Q Okay. Sorry that wasn't clear, but -- Yeah, did you</p> <p>11 send and receive text messages in connection to your</p> <p>12 redistricting work?</p> <p>13 A Yes.</p> <p>14 Q And did you use a personal phone, or was it issued</p> <p>15 by your job?</p> <p>16 A Personal phone.</p> <p>17 Q Personal phone. Okay.</p> <p>18 And did you use -- What platforms did you use on</p> <p>19 your phone for Redistricting Commission work?</p> <p>20 A Primarily text messages, the messaging app. The</p> <p>21 Legislature did provide a special app that I'm not sure</p> <p>22 the name of, but occasionally I received phone calls</p> <p>23 through that.</p> <p>24 Q Okay. Do you know if that special app is exclusive</p> <p>25 to the Legislature or if it's like a more general use app?</p>

5 (Pages 17 to 20)

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

Osta Davis

August 19, 2022

Page 21	Page 22
<p>1 MS. GOLDMAN: Objection, calls for 2 speculation. 3 A I'm not sure. 4 Q (By Mr. Thrift-Viveros) Okay. In relation to the 5 records request for the Open Public Meetings Act lawsuit 6 did you conduct any searches of your personal email for 7 emails related to the Redistricting Commission? 8 A I do not recall. 9 Q Okay. In regards to the records request for the 10 Open Public Meetings Act litigation did you conduct 11 searches of your phone for text messages or things like 12 that? 13 A I did. 14 Q Okay. And did you send those to the public records 15 officer, or do you remember who you sent them to? 16 A I sent them to the attorney. 17 Q Okay. And did you take like screen shots of the 18 text messages and send them; is that how? 19 A I did. 20 Q Okay. So were you -- We've just taken it for a 21 given that you worked on the 2021 redistricting cycle. 22 Can you tell me what date you started working for 23 that? If you don't remember the date, but just kind of in 24 general. 25 A I believe I started working the day after</p>	<p>1 Martin Luther King Day holiday was observed. 2 Q Okay. 3 A So a Tuesday. 4 Q Had you done any work on previous redistricting 5 cycles? 6 A No, I had not. 7 Q Okay. And what was your -- I guess we can go back. 8 Are you from Washington? 9 A Yes. 10 Q Okay. And what high school did you go to? 11 A I went to The Bush School. 12 Q Okay. And did you go to college? 13 A I did. 14 Q Okay. What college did you go to? 15 A Whitman College. 16 Q Okay. And what did you study in college? 17 A Politics. 18 Q So did I. 19 And did you do any coursework related to mapping, 20 or -- 21 Did you do any coursework related to mapping? 22 A No. 23 Q Okay. Did you do any coursework related to 24 politics? I mean -- sorry -- of course you did. 25 Did you do any coursework related to race?</p>
Page 23	Page 24
<p>1 MS. GOLDMAN: To what? 2 MR. THRIFT-VIVEROS: To race, like race, 3 like -- 4 MS. GOLDMAN: Objection, vague. 5 MR. THRIFT-VIVEROS: -- race theory, things 6 of that nature. 7 A Yes. 8 Q (By Mr. Thrift-Viveros) Can you tell me what 9 courses, if you remember? 10 A I do not remember. 11 Q Okay. And then after college did you have a job? 12 Did you get a job after college? 13 A Yes. 14 Q Okay. And what job was that? 15 A I worked on a campaign in the City of SeaTac. 16 Q Okay. And then after that? 17 A I continued to be employed. 18 Q Okay. Well, basically, yeah, I'd like a list of 19 your jobs after you graduated college and before you 20 started working for the commission. 21 A Yeah. I started at a fellowship called the 22 Washington Bus that was a stipend position. And then I 23 worked on the campaign, a campaign in the City of SeaTac. 24 And then I managed a campaign for a state legislative 25 candidate.</p>	<p>1 And then I worked for the State Senate Democratic 2 Campaign Committee. And then I worked for K&L Gates. And 3 then I worked for the House Democratic Campaign Committee. 4 Oh, I also worked for the Legislature. 5 Q Okay. 6 A And then I worked for the Legislature again as 7 working on the Redistricting Commission. 8 Q Okay. And what positions did you hold with the 9 Legislature the two times? 10 A The first time I worked as a legislative assistant. 11 Q Was it for a specific legislator, or -- 12 A Yes. 13 Q Okay. What was their name? 14 A Christine Kilduff. 15 Q Is she still a legislator now? 16 A No. 17 Q Okay. And then your second stint with the 18 Legislature? 19 A I worked as a redistricting analyst. 20 Q And that was for this cycle, the redistricting 21 cycle? 22 A Yes. 23 Q Okay. And then you mentioned you worked on some 24 campaigns. Can you tell me whose campaigns you worked 25 for?</p>

6 (Pages 21 to 24)

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

Osta Davis

August 19, 2022

Page 25	Page 26
<p>1 A Yes. Well, in 2013 I worked on the campaign in 2 SeaTac for a minimum wage ballot initiative. 3 In 2014 I worked to elect Christine Kilduff to the 4 State Legislature. 5 In 2016 I worked for the Senate Democratic Campaign 6 Committee, and so that involved a number of State Senate 7 campaigns. 8 And then for the 2018 and 2020 cycles I worked for 9 the House Democratic Campaign Committee, which involved a 10 number of House Democratic legislative campaigns. 11 Q For the Senate Dem Campaign Committee do you have 12 like an estimate of how many legislators or how many 13 senators or candidates' campaigns that you worked on? 14 A No. 15 Q It was a lot? 16 A It was -- I worked in a role that supported the 17 campaign committee that provides support to all of their 18 members' senators. 19 Q And with the House Democratic Campaign Committee was 20 it a similar situation? 21 A Yes. 22 Q Okay. So you mentioned before that you read the 23 Complaint for this lawsuit. 24 A (Nodded.) 25 Q When did you read the Complaint; do you recall?</p>	<p>1 A Last night. 2 Q Okay. Had you read it before? 3 A Yes. 4 Q Do you recall when? 5 A Wednesday. 6 Q Okay. Anytime before then, or -- 7 A Not thoroughly. Not to my knowledge. 8 Q Okay. Do you have an opinion on the Complaint? 9 MS. GOLDMAN: Objection, vague. 10 A No. 11 Q (By Mr. Thrift-Viveros) Did you bring any documents 12 with you today? 13 A No. 14 Q Okay. And besides meetings with your counsel and 15 reading the Complaint, did you do anything else to prepare 16 for this deposition? 17 A No. 18 Q Okay. Oh, yeah, I wanted to ask one more thing 19 about your job history. Sorry. 20 Can you tell me what Washington Bus is? 21 A It's a nonprofit that engages young people in the 22 civic process. 23 Q Okay. So like what kind of activities? 24 A Primarily the bulk of the work is voter 25 registration.</p>
Page 27	Page 28
<p>1 Q Oh, okay. And then for K&L Gates what kind of work 2 did you do? 3 A I was a Government Affairs Specialist. 4 Q And what does that entail? 5 A I supported clients that in this case were primarily 6 school districts. 7 Q Sorry. Is K&L Gates a law firm? 8 A Yes. 9 Q Okay. And what was your job title with them? 10 A I was hired as a Government Affairs Specialist, and 11 I believe the title was adjusted to reflect Government 12 Affairs Practice Specialist. 13 Q Okay. 14 A I don't remember the exact -- 15 Q That's fine. 16 A -- title. 17 Q Are you currently employed? 18 A Yes. 19 Q And where are you working now? 20 A The State Legislature. 21 Q Okay. And what's your title? 22 A Policy analyst. 23 Q Okay. And is that a nonpartisan position? 24 A No. 25 Q Okay. Are you working for a specific legislator or</p>	<p>1 for the body as a whole? 2 A I'm working for the House Democratic Caucus. 3 Q Okay. Prior to your work on this redistricting 4 cycle of 2020 had you done any work in drawing maps? 5 A Yes. 6 Q Can you tell me in what capacity? 7 A A personal interest capacity. 8 Q Okay. So you were just interested in looking at 9 maps, or can you elaborate a little bit more on that? 10 A Yes. I had spent some time playing around with the 11 Dave's Redistricting App and had worked on maps mostly as 12 a way to familiarize myself with the platform. 13 Q Did you do that in anticipation -- Sorry. 14 Did you do that in anticipation of getting a job 15 doing mapmaking? 16 MS. GOLDMAN: Objection, vague. 17 A No. I think I just did it because of personal 18 interest. 19 Q (By Mr. Thrift-Viveros) Okay. Yeah. 20 So for the purposes of this deposition I'm going to 21 use the terms Hispanic and Latino interchangeably. 22 What's your understanding of the term Hispanic? 23 A My understanding is that it includes people of 24 Central and South American descent. 25 Q And what's your understanding of the definition of</p>

7 (Pages 25 to 28)

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

Osta Davis

August 19, 2022

Page 29	Page 30
<p>1 Latino?</p> <p>2 A My understanding is the same.</p> <p>3 Q Okay. And when you were doing work on the</p> <p>4 commission would you personally use those words</p> <p>5 interchangeably, or did you have distinct definitions for</p> <p>6 them?</p> <p>7 MS. GOLDMAN: Objection, compound.</p> <p>8 A I did not have distinct definitions, and my</p> <p>9 understanding is that they were used interchangeably.</p> <p>10 Q (By Mr. Thrift-Viveros) Okay. When you say they</p> <p>11 were used interchangeably, who are you referring to using</p> <p>12 them interchangeably?</p> <p>13 A Staff communications.</p> <p>14 Q Okay. Does that include the commissioners?</p> <p>15 MS. GOLDMAN: Objection, vague.</p> <p>16 A I don't recall.</p> <p>17 Q (By Mr. Thrift-Viveros) Okay.</p> <p>18 A My understanding is the census data uses Hispanic.</p> <p>19 Q Okay. Do you identify as Hispanic or Latino?</p> <p>20 A No.</p> <p>21 Q Prior to the Redistricting Commission had you ever</p> <p>22 done any work in the Yakima Valley region?</p> <p>23 A No.</p> <p>24 Q Okay. And when I refer to Yakima Valley region, I'm</p> <p>25 referring to Yakima, Benton, Adams, Franklin Counties.</p>	<p>1 Okay. Is that your understanding of the term Yakima</p> <p>2 Valley region?</p> <p>3 MS. GOLDMAN: Objection, calls for</p> <p>4 speculation.</p> <p>5 A More or less.</p> <p>6 Q (By Mr. Thrift-Viveros) Okay. I just want to make</p> <p>7 sure I'm getting the geography right.</p> <p>8 What do you know about the demographics about the</p> <p>9 Yakima Valley region?</p> <p>10 A I know that the Latino/Hispanic population has</p> <p>11 increased significantly since the last round of</p> <p>12 redistricting.</p> <p>13 Q Do you know by -- When you say significantly, do you</p> <p>14 know how much that is?</p> <p>15 A No.</p> <p>16 Q Okay. Do you know how much of the population of the</p> <p>17 Yakima Valley is Latino?</p> <p>18 A No.</p> <p>19 Q Okay. And what do you know about the demographics</p> <p>20 of Pasco and the area around Pasco?</p> <p>21 MS. GOLDMAN: Objection, compound.</p> <p>22 A My understanding is that the Hispanic population</p> <p>23 there has similarly increased.</p> <p>24 Q (By Mr. Thrift-Viveros) Do you know about how much?</p> <p>25 A No.</p>
Page 31	Page 32
<p>1 Q Okay. Are you aware of discrimination experienced</p> <p>2 by Latinos in the Yakima Valley region?</p> <p>3 A Yes.</p> <p>4 Q Have you heard of specific stories or anecdotes?</p> <p>5 A Yes.</p> <p>6 Q What have you heard?</p> <p>7 A I heard the descriptions of what was written in the</p> <p>8 Complaint, and I heard about the lawsuit around, I</p> <p>9 believe, the county and city council.</p> <p>10 Q Okay. What have you -- Sorry. What have you heard</p> <p>11 about that lawsuit?</p> <p>12 A That there was proof of discrimination as it relates</p> <p>13 to elections.</p> <p>14 Q So before you started the redistricting process had</p> <p>15 you heard about previous litigation in the Yakima Valley</p> <p>16 region around the Voting Rights Act and voting?</p> <p>17 A Yes.</p> <p>18 Q Do you recall what cases you have heard of prior to</p> <p>19 starting redistricting work?</p> <p>20 A No.</p> <p>21 Q Have you heard about the Montes v. City of Yakima</p> <p>22 case?</p> <p>23 A That sounds familiar.</p> <p>24 Q Okay. Have you heard about the Glatt v. City of</p> <p>25 Pasco case?</p>	<p>1 A I don't recall.</p> <p>2 Q Okay.</p> <p>3 (Court reporter request for clarification.)</p> <p>4 MR. THRIFT-VIVEROS: Glatt, G-L-A-T-T.</p> <p>5 Q Have you heard about the Aguilar v. Yakima County</p> <p>6 case?</p> <p>7 A I believe so.</p> <p>8 Q Okay. Had you heard about it before you started</p> <p>9 work on the redistricting process?</p> <p>10 A I believe so.</p> <p>11 Q What did you know about that case?</p> <p>12 A My understanding is it was related to how districts</p> <p>13 were drawn, and I had read some analysis about the effects</p> <p>14 of the current districts.</p> <p>15 Q Do you recall what that analysis was?</p> <p>16 A My sense was that the analysis pointed to the</p> <p>17 presence of racially polarized voting.</p> <p>18 Q What does racially polarized voting mean to you?</p> <p>19 MS. GOLDMAN: Objection, calls for a legal</p> <p>20 conclusion.</p> <p>21 Q (By Mr. Thrift-Viveros) You can answer.</p> <p>22 A Yeah, in my own understanding racially polarized</p> <p>23 voting would be when folks in different racial or ethnic</p> <p>24 blocs vote cohesively in contrast to the majority or white</p> <p>25 voters, or I guess it could -- It doesn't necessarily</p>

8 (Pages 29 to 32)

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

Osta Davis

August 19, 2022

Page 33	Page 34
<p>1 depend on the race of the groups, but that there is</p> <p>2 distinct cohesive racial or ethnic voting blocs that are</p> <p>3 in contrast to one another.</p> <p>4 Q Okay. And what does cohesive mean to you in this</p> <p>5 context?</p> <p>6 A My understanding is that that would indicate that at</p> <p>7 least a majority of a certain racial or ethnic group votes</p> <p>8 in a similar way.</p> <p>9 Q Okay. In general when you -- or let me take that</p> <p>10 back.</p> <p>11 When you were working for the commission did you --</p> <p>12 Sorry, let me take that back one more time.</p> <p>13 Let's go back a little bit. So you mentioned that</p> <p>14 you were hired shortly after Martin Luther King, Jr. day.</p> <p>15 What was your official job title?</p> <p>16 A Redistricting Analyst.</p> <p>17 Q Okay. And who was your employer?</p> <p>18 A The House Democratic Caucus.</p> <p>19 Q Okay. Did you work with all of the commissioners or</p> <p>20 specific ones?</p> <p>21 A I worked primarily with Commissioner April Sims.</p> <p>22 Q Okay. And when you say primarily, can you give me</p> <p>23 an estimate, like a percentage estimate of how much time</p> <p>24 you would work with her versus -- Well, yeah, a percentage</p> <p>25 of how much of your normal workweek you worked with</p>	<p>1 Commissioner Sims?</p> <p>2 A Is that how much time we were actively working</p> <p>3 together or time that I was working independent from her</p> <p>4 but at her direction?</p> <p>5 Q That's a good question, and I'll ask you both.</p> <p>6 So how much of your average workweek did you work</p> <p>7 like with Commissioner Sims in active communication,</p> <p>8 either in meetings or by text, if you have an estimate?</p> <p>9 A I would say it varied. In the fall when the</p> <p>10 commission was most active the communication was six or</p> <p>11 seven days a week, but before the commission had fully</p> <p>12 gotten up and running and we'd received the census data,</p> <p>13 that was probably three or four times a week.</p> <p>14 Q Okay. Do you recall when you received the census</p> <p>15 data?</p> <p>16 A I believe it was mid August.</p> <p>17 Q Okay. And you mentioned that you were hired on</p> <p>18 Martin Luther -- the day after Martin Luther King, Jr. day</p> <p>19 was your first day.</p> <p>20 What year was that?</p> <p>21 A 2021.</p> <p>22 Q Okay. And can you walk me a little bit -- Sorry, I</p> <p>23 keep going back in time, but can you walk me through a</p> <p>24 little bit of the hiring process? Did you submit a job</p> <p>25 application, or did you talk to someone to get the job?</p>
Page 35	Page 36
<p>1 MS. GOLDMAN: Objection, compound.</p> <p>2 A My understanding was that I sent my résumé to the</p> <p>3 chief of staff of the House Democratic Caucus.</p> <p>4 Q (By Mr. Thrift-Viveros) Okay.</p> <p>5 A Following that I had conversations with the chief of</p> <p>6 staff and then was more formally interviewed by</p> <p>7 Commissioner April Sims.</p> <p>8 Q Okay. And when you applied for your position did</p> <p>9 you specifically apply for the position of redistricting</p> <p>10 analyst?</p> <p>11 A Yes.</p> <p>12 Q Okay. And was it specifically for Commissioner</p> <p>13 Sims, or --</p> <p>14 A Yes. Commissioner Sims hadn't formally been</p> <p>15 appointed at that point, but it was my understanding that</p> <p>16 she would go on to be the commissioner.</p> <p>17 Q Okay. Had you worked with Commissioner Sims before?</p> <p>18 A No.</p> <p>19 Q Had you met her before?</p> <p>20 A Yes.</p> <p>21 Q Okay. In what capacity did you meet her?</p> <p>22 A I believe in 2018 we both spoke on a panel.</p> <p>23 Q Okay. And what was that panel about, if you</p> <p>24 remember?</p> <p>25 A Elections and civic engagement.</p>	<p>1 Q So once you started working, you started your job,</p> <p>2 what were your -- Or walk me through like a typical day,</p> <p>3 and you can start early on and then later on in the fall</p> <p>4 what a typical day looked like.</p> <p>5 MS. GOLDMAN: Objection, compound.</p> <p>6 A At the early stages of my job much of the work</p> <p>7 seemed to be figuring out how this agency would come</p> <p>8 about.</p> <p>9 When I was hired there were no employees at the</p> <p>10 Redistricting Commission, and so some element of my role</p> <p>11 was helping Commissioner Sims have the resources to begin</p> <p>12 posting job searches for these roles, as well as</p> <p>13 coordinating the basics of the redistricting meetings that</p> <p>14 occurred before there were redistricting staff.</p> <p>15 Once the census data was received much more of the</p> <p>16 focus turned to mapping.</p> <p>17 Q (By Mr. Thrift-Viveros) Were you the primary</p> <p>18 mapmaker for Commissioner Sims?</p> <p>19 A No.</p> <p>20 Q Okay. Who was?</p> <p>21 A Dominique Meyers and I both contributed to making</p> <p>22 maps.</p> <p>23 Q Okay. Do you recall when Dominique Meyers was</p> <p>24 hired?</p> <p>25 A No.</p>

9 (Pages 33 to 36)

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

Osta Davis

August 19, 2022

Page 37	Page 38
<p>1 Q Okay. But you were the first employee of the</p> <p>2 commission?</p> <p>3 A Dominique Meyers is the Deputy Chief of Staff and</p> <p>4 had worked at the Legislature before I was hired and</p> <p>5 continues to work at the Legislature.</p> <p>6 Q Okay. And you mentioned earlier that you helped</p> <p>7 with job postings and things like that when you first</p> <p>8 started out. Were you the first employee of the</p> <p>9 commission?</p> <p>10 MS. GOLDMAN: Objection, misstates the</p> <p>11 testimony.</p> <p>12 A I was not employed by the commission.</p> <p>13 Q (By Mr. Thrift-Viveros) Okay. Right.</p> <p>14 Were you the first staff member of the commission?</p> <p>15 MS. GOLDMAN: Objection, misstates the</p> <p>16 testimony.</p> <p>17 A I wasn't employed by the commission.</p> <p>18 Q (By Mr. Thrift-Viveros) Right. Okay. So were you</p> <p>19 the first non-commissioner to work on commission work?</p> <p>20 A No.</p> <p>21 Q Okay. Who else was there before you?</p> <p>22 A Many of the folks involved in redistricting have</p> <p>23 worked at the Legislature for quite a while, --</p> <p>24 Q Right.</p> <p>25 A -- so I would not have a sense as to when they began</p>	<p>1 working on this.</p> <p>2 Q Okay. I'm just trying to get a better sense sort of</p> <p>3 of how the aides and the commissioners worked together, so</p> <p>4 if you could help me understand.</p> <p>5 Did each commissioner have a set of aides that would</p> <p>6 primarily report to them?</p> <p>7 A My understanding -- and it's difficult to speak to</p> <p>8 how the other commissioners set up their role or what</p> <p>9 support they had -- but my understanding is that primarily</p> <p>10 one staff member was assigned to work most closely with</p> <p>11 each commissioner, and then within our respective caucuses</p> <p>12 we could use other staff as resources to help field</p> <p>13 questions as they came up.</p> <p>14 Q Was Dominique Meyers in that second category of</p> <p>15 people you were talking about?</p> <p>16 A Yes.</p> <p>17 Q Okay. So did Commissioner Sims have any other</p> <p>18 aides, people who reported directly to her, besides you?</p> <p>19 A We did hire a GIS analyst who worked exclusively on</p> <p>20 redistricting for Commissioner Sims.</p> <p>21 Q And what's their name; do you know?</p> <p>22 A I believe her name is Melissa Vanderwerf.</p> <p>23 Q Did you work closely with her?</p> <p>24 A Yes.</p> <p>25 Q Okay. Do you recall the dates of her employment?</p>
Page 39	Page 40
<p>1 A Not specifically, but my understanding was that she</p> <p>2 was hired around mid August --</p> <p>3 Q Okay.</p> <p>4 A -- and worked through mid November.</p> <p>5 Q So she was there until the end?</p> <p>6 A I don't know when it's all ended, but she was there</p> <p>7 in November.</p> <p>8 Q Okay. And forgive me for my ignorance, but what</p> <p>9 does a GIS analyst do?</p> <p>10 A I don't know what this role would look like in other</p> <p>11 teams, but for us her primary job was to upload maps into</p> <p>12 the Edge software.</p> <p>13 Q Was the Edge software the primary map platform that</p> <p>14 you used?</p> <p>15 A No.</p> <p>16 Q What was the primary map platform that you used?</p> <p>17 A Dave's Redistricting App.</p> <p>18 Q Okay. So I'm going to get back to the mapmaking in</p> <p>19 a bit, but -- or I guess -- Yeah, sort of -- Let me strike</p> <p>20 all that.</p> <p>21 What was the process that you would use when you</p> <p>22 would make maps? And by process I kind of want to know</p> <p>23 what platforms did you use? Did you upload to Dave's and</p> <p>24 then send it to the GIS analyst? Like can you walk me</p> <p>25 through that process?</p>	<p>1 MS. GOLDMAN: Objection, compound.</p> <p>2 A We nearly exclusively used Dave's Redistricting App.</p> <p>3 That is the platform where by my estimation 99 percent of</p> <p>4 our mapping occurred.</p> <p>5 Other commissioners used other software, as did the</p> <p>6 Redistricting Commission itself. And so my understanding,</p> <p>7 my recollection of mapmaking processes was that it was</p> <p>8 nearly exclusively -- Maps were nearly exclusively drafted</p> <p>9 in Dave's Redistricting App, and then once we had a final</p> <p>10 map we would send them to our analyst to upload those maps</p> <p>11 into Edge.</p> <p>12 Q (By Mr. Thrift-Viveros) Do you know what platforms</p> <p>13 the other commissioners and their aides used?</p> <p>14 MS. GOLDMAN: Objection, calls for</p> <p>15 speculation.</p> <p>16 A I can't say for certain, but my understanding is</p> <p>17 that every commissioner except Commissioner Fain used</p> <p>18 Dave's Redistricting App, whereas Commissioners --</p> <p>19 Commissioner Fain's staff primarily preferred using Edge.</p> <p>20 Q (By Mr. Thrift-Viveros) When the commission -- or</p> <p>21 sorry. When the commissioners would release their maps to</p> <p>22 the public what program were those maps made in; do you</p> <p>23 know?</p> <p>24 MS. GOLDMAN: Objection, compound, vague.</p> <p>25 A My understanding is that the -- that Edge was used</p>

10 (Pages 37 to 40)

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

Osta Davis

August 19, 2022

Page 41	Page 42
<p>1 by the nonpartisan staff, and so to post maps on their</p> <p>2 website they necessarily required them to be in Edge --</p> <p>3 Q (By Mr. Thrift-Viveros) Okay.</p> <p>4 A -- to publish maps.</p> <p>5 Q And why did you use Dave's Redistricting as your</p> <p>6 primary mapmaking platform?</p> <p>7 A By my estimation Dave's Redistricting was far and</p> <p>8 away the most user-friendly tool.</p> <p>9 Q And if I recall, that was the tool that you used</p> <p>10 before redistricting for your personal use; is that</p> <p>11 correct?</p> <p>12 A Yes.</p> <p>13 Q Okay. So what roles did you hold in your position</p> <p>14 as a Redistricting Analyst?</p> <p>15 MS. GOLDMAN: Objection, vague.</p> <p>16 Q (By Mr. Thrift-Viveros) Or what were your job</p> <p>17 duties?</p> <p>18 A My job duties included staffing Commissioner Sims</p> <p>19 during public meetings and preparing her for meetings and</p> <p>20 public hearing sessions. They included working with other</p> <p>21 staff, commissioner-assigned staff.</p> <p>22 They included weekly meetings with the nonpartisan</p> <p>23 commission staff. They included drafting maps and</p> <p>24 analyzing maps and consolidating and digesting feedback</p> <p>25 from both the public and members of the House Democratic</p>	<p>1 Caucus.</p> <p>2 Q Okay. So I'm going to walk through those job</p> <p>3 duties. So first you said you would staff</p> <p>4 Commissioner Sims at public meetings.</p> <p>5 A (Nodded.)</p> <p>6 Q What does that mean, staffing?</p> <p>7 A That would mean joining the Zoom. All of her</p> <p>8 meetings were held virtually.</p> <p>9 Q And when you say public meetings, what does that</p> <p>10 mean?</p> <p>11 A My -- What I meant by that term were meetings that</p> <p>12 were held by the Redistricting Commission.</p> <p>13 Q Okay. And sorry, just to clarify, when you say</p> <p>14 meetings held by the Redistricting Commission, does that</p> <p>15 mean meetings with people outside of the commission when</p> <p>16 you say public meetings?</p> <p>17 A I was referring to the meetings that were listed on</p> <p>18 the Redistricting Commission website that were open and</p> <p>19 available to anyone and advertised as such.</p> <p>20 Q Understood. Did you ever staff other commissioners</p> <p>21 on this, on these meetings?</p> <p>22 A No.</p> <p>23 Q Okay. Did you ever take assignments from other</p> <p>24 commissioners?</p> <p>25 A Not to my recollection.</p>
Page 43	Page 44
<p>1 Q Okay. And each commissioner, as far as you know,</p> <p>2 had their own aide that they worked with; is that --</p> <p>3 A That was my understanding.</p> <p>4 Q Okay. Do you know if every commissioner had their</p> <p>5 own GIS analyst?</p> <p>6 A No.</p> <p>7 Q Do you know which commissioners, if any, did have</p> <p>8 their own GIS analyst besides Commissioner Sims?</p> <p>9 A Commissioner Walkinshaw had a team of folks, and my</p> <p>10 understanding is that most of the mapping was done by</p> <p>11 folks who were not his specific assigned person. I'd say</p> <p>12 primarily Matt Bridges and Adam Bartz I know both drafted</p> <p>13 maps.</p> <p>14 Q Matt Bridges, Adam Bartz. Do you know how to spell</p> <p>15 his last name?</p> <p>16 A B-A-R-T-Z.</p> <p>17 Q Okay. And do you know if Matt Bridges and Adam</p> <p>18 Bartz were GIS analysts?</p> <p>19 A No.</p> <p>20 Q Okay. And for Commissioners Graves -- or for</p> <p>21 Commissioner Graves do you know if he had a GIS analyst?</p> <p>22 A My understanding was that Anton exclusively did all</p> <p>23 of his mapping, --</p> <p>24 Q Okay.</p> <p>25 A -- but that was -- that was all that I was aware of.</p>	<p>1 And then for Commissioner Fain there was an</p> <p>2 additional staff person who I saw on weekly calls, but I</p> <p>3 was not completely aware of her -- what her role entailed.</p> <p>4 It might have been related to mapping.</p> <p>5 Q Do you remember her name?</p> <p>6 A No.</p> <p>7 Q Okay. Do you remember what Commissioner Fain's</p> <p>8 aide's name is?</p> <p>9 A Yes, Paul Campos.</p> <p>10 Q Okay. And when you mentioned Anton before, you</p> <p>11 meant Anton Grose?</p> <p>12 A Yes.</p> <p>13 Q Okay. Do you know if Commissioner Graves had other</p> <p>14 staff members besides Anton Grose?</p> <p>15 MS. GOLDMAN: Objection, calls for</p> <p>16 speculation.</p> <p>17 A Not that I was aware of.</p> <p>18 Q (By Mr. Thrift-Viveros) Okay. And for</p> <p>19 Ms. Augustine, did she have aides and staff as well, as</p> <p>20 far as you know?</p> <p>21 MS. GOLDMAN: Objection vague.</p> <p>22 A Chair Augustine was similarly a nonpartisan</p> <p>23 commissioner, and so my understanding -- it could be</p> <p>24 interpreted differently -- was that the nonpartisan</p> <p>25 Redistricting Commission staff in some capacity were her</p>

11 (Pages 41 to 44)

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

Osta Davis

August 19, 2022

Page 45	Page 46
<p>1 staff as well.</p> <p>2 Q (By Mr. Thrift-Viveros) Understood. As far as you</p> <p>3 know did Chair Augustine participate in the mapmaking</p> <p>4 process?</p> <p>5 MS. GOLDMAN: Objection, calls for</p> <p>6 speculation.</p> <p>7 A No, I do not recall her being involved in mapmaking.</p> <p>8 Q (By Mr. Thrift-Viveros) What did you understand</p> <p>9 Commissioner Augustine's role to be?</p> <p>10 A My understanding was that Commissioner Augustine</p> <p>11 served as chair during our meetings and helped draft</p> <p>12 addenda items for those meetings.</p> <p>13 She also served as in a facilitator capacity and</p> <p>14 helped give guidance to the executive director in terms of</p> <p>15 developing a public outreach calendar.</p> <p>16 Q Was -- Sorry. The public outreach calendar, did</p> <p>17 each commissioner have their own public outreach calendar?</p> <p>18 A No.</p> <p>19 Q Okay. So the public outreach calendar was generally</p> <p>20 scheduled for the entire commission?</p> <p>21 A Yes. The Redistricting Commission came up with a</p> <p>22 number of meetings soliciting public outreach from</p> <p>23 different regions of the state.</p> <p>24 Q And those public outreach meetings, were they</p> <p>25 conducted in person?</p>	<p>1 A They were all on Zoom.</p> <p>2 Q Okay. Did you attend any of those public outreach</p> <p>3 meetings?</p> <p>4 A Yes.</p> <p>5 Q Do you recall how many?</p> <p>6 A No.</p> <p>7 Q Do you think more than five? More than -- More than</p> <p>8 five?</p> <p>9 A My understanding is yes. I forget the exact number</p> <p>10 of public outreach meetings, but I would estimate that I</p> <p>11 attended all but perhaps one or two.</p> <p>12 Q Okay. And just an estimate, like 20 or ten or 50?</p> <p>13 A I -- My understanding was that there were at least</p> <p>14 ten meetings.</p> <p>15 Q Okay.</p> <p>16 A I do not believe that there were 20, but I would</p> <p>17 have to look at the website to know for certain.</p> <p>18 Q Okay. So between ten and 20 seems about right?</p> <p>19 A Yeah.</p> <p>20 Q It's not a -- Yeah. Okay.</p> <p>21 And you believe you attended most of them?</p> <p>22 A Yes.</p> <p>23 Q And in these public outreach meetings were they</p> <p>24 specifically -- Let me strike that.</p> <p>25 These public outreach meetings, were they open to</p>
Page 47	Page 48
<p>1 everyone, or were they focused on specific groups of</p> <p>2 people or geographic regions?</p> <p>3 MS. GOLDMAN: Objection, compound.</p> <p>4 A My understanding is that they were primarily</p> <p>5 designated for certain geographic regions.</p> <p>6 Q (By Mr. Thrift-Viveros) Do you know how these public</p> <p>7 outreach meetings were advertised?</p> <p>8 A My understanding is that emails and press releases</p> <p>9 were sent out, as well as advertising through social</p> <p>10 media. And I believe that certain community groups that</p> <p>11 had been identified were also reached out to as well.</p> <p>12 Q Okay. Did you -- Sorry.</p> <p>13 Did the commission, as far as -- Excuse me. Let me</p> <p>14 take that back.</p> <p>15 As far as you know did the commission conduct a</p> <p>16 public outreach event for the Yakima Valley region?</p> <p>17 A Yes. My understanding is that yes.</p> <p>18 Q Did you attend that meeting?</p> <p>19 A I believe so.</p> <p>20 Q Okay. Do you recall anything from that meeting?</p> <p>21 A Not specifically.</p> <p>22 Q Okay. And you mentioned community groups. Would</p> <p>23 Commissioner Sims specifically, since I presume you know</p> <p>24 more about -- Sorry. Let me take all that back.</p> <p>25 Did you work on scheduling events for</p>	<p>1 Commissioner Sims?</p> <p>2 A Not to my recollection.</p> <p>3 Q Okay. Did you have access to Commissioner Sims's</p> <p>4 calendar?</p> <p>5 A Yes.</p> <p>6 Q Okay. As far as you know, would Commissioner Sims</p> <p>7 meet with these public interest groups or individually, on</p> <p>8 an individual basis?</p> <p>9 A Yes. There certainly were some meetings with</p> <p>10 interested groups.</p> <p>11 Q Okay. Would you generally -- Did you attend those</p> <p>12 meetings?</p> <p>13 A Yes.</p> <p>14 Q Would you say you attended all those meetings or</p> <p>15 some?</p> <p>16 A I would say that I attended the clear majority of</p> <p>17 those meetings.</p> <p>18 Q Okay. Did you ever meet with groups or individuals</p> <p>19 on behalf of Commissioner Sims but without</p> <p>20 Commissioner Sims?</p> <p>21 A Yes.</p> <p>22 Q And how often, if you recall?</p> <p>23 A Less frequently.</p> <p>24 Q Would you say once a week or more frequently?</p> <p>25 A Less frequently than once a week.</p>

12 (Pages 45 to 48)

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

Osta Davis

August 19, 2022

Page 49	Page 50
<p>1 Q Okay.</p> <p>2 A I would primarily attend on her behalf if she had a</p> <p>3 scheduling conflict or was running late.</p> <p>4 Q Do you recall who you met with when it was just you</p> <p>5 individually on behalf of Commissioner Sims but without</p> <p>6 Commissioner Sims?</p> <p>7 A Yes. I met with a local Democratic group in roughly</p> <p>8 northwest Washington. I believe I may have met with</p> <p>9 members of the Redistricting Justice Coalition group.</p> <p>10 Q When you met with -- or sorry.</p> <p>11 Do you recall any other meetings besides that one</p> <p>12 and the Redistricting Justice?</p> <p>13 MS. GOLDMAN: Objection, vague.</p> <p>14 A No, I don't recall.</p> <p>15 Q (By Mr. Thrift-Viveros) Okay. Did you meet with --</p> <p>16 and this is you representing Commissioner Sims but without</p> <p>17 Commissioner Sims -- did you meet with each of those two</p> <p>18 groups one time or multiple times?</p> <p>19 A I met with the Redistricting Coalition on a</p> <p>20 reoccurring basis, but primarily Commissioner Sims was</p> <p>21 present --</p> <p>22 Q Um-hmm. Okay.</p> <p>23 A -- or would join 15 minutes late.</p> <p>24 Q Okay. Did the Redistricting -- or sorry. Let me</p> <p>25 strike that.</p>	<p>1 Can you tell me a little bit about the Redistricting</p> <p>2 Justice Coalition? Do you know who they are?</p> <p>3 A My understanding was that it was comprised of a</p> <p>4 number of people. It seemed like there were a couple of</p> <p>5 folks who acted more as leads for the coalition but that</p> <p>6 the coalition included individuals and private citizens as</p> <p>7 well as other interested advocacy groups.</p> <p>8 Q Okay. So the coalition was made up of other groups</p> <p>9 and individuals?</p> <p>10 A That was my understanding.</p> <p>11 Q Okay. Did the coalition express to you certain</p> <p>12 goals that they -- or sorry.</p> <p>13 Did the coalition express to you certain things that</p> <p>14 they wanted to see from the redistricting process?</p> <p>15 A Yes.</p> <p>16 Q What did they -- Do you recall what they asked for?</p> <p>17 A I don't recall in entirety, but I know they included</p> <p>18 points such as accessibility at public meetings. They</p> <p>19 included creating more districts for communities of color</p> <p>20 to be able to elect their candidate of choice.</p> <p>21 Q Okay. When you say creating more districts for</p> <p>22 communities of color to elect candidates of their choice,</p> <p>23 was there any specific areas that the Redistricting</p> <p>24 Justice Coalition pointed to?</p> <p>25 A Yes. At the start it's -- My recollection was that</p>
Page 51	Page 52
<p>1 their focus was primarily in south King County.</p> <p>2 Q Okay.</p> <p>3 A And then later on during the course of redistricting</p> <p>4 they had more interest in the Yakima Valley region.</p> <p>5 Q And when you say -- or sorry. You said further on;</p> <p>6 right, they had more interest in the Yakima Valley region?</p> <p>7 Do you recall around when? Was it -- What month,</p> <p>8 maybe?</p> <p>9 A My guess would be October-ish, --</p> <p>10 Q Okay.</p> <p>11 A -- but that would -- It would be hard to pin down</p> <p>12 exactly.</p> <p>13 Q Commissioner Sims and Commissioner Walkinshaw</p> <p>14 released maps to the public, posted on the public website</p> <p>15 in September; is that correct?</p> <p>16 A Yes.</p> <p>17 Q And was that the first set of public posted maps?</p> <p>18 A Yes.</p> <p>19 Q Okay. And sorry, was it all the commissioners</p> <p>20 posted in September the public maps, as far as you know?</p> <p>21 A Yes.</p> <p>22 Q Okay. And also in October as well; right?</p> <p>23 MS. GOLDMAN: Objection as to form, vague.</p> <p>24 Q (By Mr. Thrift-Viveros) Sorry. In October all of</p> <p>25 the commissioners -- Did all of the commissioners post</p>	<p>1 public maps in October as well?</p> <p>2 A No.</p> <p>3 Q Was it just Commissioner Sims and Walkinshaw?</p> <p>4 A Yes.</p> <p>5 Q Okay. And do you recall if the coalition, the</p> <p>6 Redistricting Justice Coalition started pushing for or</p> <p>7 started expressing interest in a district for communities</p> <p>8 of color in Yakima, do you recall if that happened before</p> <p>9 or after the release of the September map?</p> <p>10 A I --</p> <p>11 MS. GOLDMAN: Objection. Objection as to</p> <p>12 form, vague.</p> <p>13 A I don't recall.</p> <p>14 Q (By Mr. Thrift-Viveros) Okay. And do you recall if</p> <p>15 they started pushing for that Yakima Valley district</p> <p>16 before or after Commissioners Walkinshaw and Sims released</p> <p>17 their October maps?</p> <p>18 A I don't recall.</p> <p>19 MR. THRIFT-VIVEROS: Should we take a</p> <p>20 break?</p> <p>21 MS. GOLDMAN: Sure.</p> <p>22 MR. THRIFT-VIVEROS: Is everyone okay with</p> <p>23 a break?</p> <p>24 All right. We'll go off the record.</p> <p>25 (Break 10:21 a.m. to 10:31 a.m.)</p>

13 (Pages 49 to 52)

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

Osta Davis

August 19, 2022

Page 53	Page 54
<p>1 MR. THRIFT-VIVEROS: All right. We'll go</p> <p>2 back on the record. Thank you.</p> <p>3 Q (By Mr. Thrift-Viveros) So as we said before we went</p> <p>4 on break, we were talking about the Redistricting Justice</p> <p>5 Coalition, and you mentioned that Commissioner Sims and</p> <p>6 you would meet with them on a regular basis or recurring</p> <p>7 basis; is that correct?</p> <p>8 A Yes.</p> <p>9 Q Do you recall how frequently you would meet with</p> <p>10 them?</p> <p>11 A About once a month.</p> <p>12 Q Okay. Was it generally -- Sorry. Let me just take</p> <p>13 that back.</p> <p>14 In those meetings about how many people represented</p> <p>15 the Redistricting Justice Coalition, on average?</p> <p>16 A I would say anywhere from ten to 20 people.</p> <p>17 Q Okay. And as far as you know were those people like</p> <p>18 the leadership of the coalition or representatives from</p> <p>19 different organizations?</p> <p>20 A I don't recall.</p> <p>21 Q As far as you know did the Redistricting Justice</p> <p>22 Coalition meet with any other commissioners?</p> <p>23 MS. GOLDMAN: Objection, calls for</p> <p>24 speculation.</p> <p>25 A Yes.</p>	<p>1 Q (By Mr. Thrift-Viveros) And how do you know that?</p> <p>2 A Commissioner Walkinshaw would attend meetings with</p> <p>3 us.</p> <p>4 Q Okay. Did you work with Commissioner Walkinshaw?</p> <p>5 A Yes.</p> <p>6 Q In what capacity?</p> <p>7 A We would attend meetings together. I worked</p> <p>8 probably more closely with his staff, but we were often at</p> <p>9 the same meetings or on email chains together.</p> <p>10 Q Okay. And do you recall who was on Commissioner</p> <p>11 Walkinshaw's staff?</p> <p>12 A Yes.</p> <p>13 Q Do you have their names?</p> <p>14 A Yes. Commissioner Walkinshaw worked with</p> <p>15 Ali O'Neil, I believe primarily, but then the team also</p> <p>16 included Matt Bridges --</p> <p>17 Q Okay.</p> <p>18 A -- and other people that I don't remember their</p> <p>19 names.</p> <p>20 Q The other name that you mentioned earlier,</p> <p>21 Adam Bartz; right?</p> <p>22 A Yes. My understanding is that Adam Bartz was</p> <p>23 involved.</p> <p>24 I believe there was also another person named Adam</p> <p>25 who was also involved.</p>
Page 55	Page 56
<p>1 Q Okay. And you don't recall the other Adam's last</p> <p>2 name?</p> <p>3 A No.</p> <p>4 Q Okay. And going back to Dominique Meyers, what</p> <p>5 duties, job duties, did she have when she was working on</p> <p>6 the redistricting work?</p> <p>7 MS. GOLDMAN: Objection, calls for</p> <p>8 speculation, lack of foundation.</p> <p>9 A Dominique Meyers primarily became involved I would</p> <p>10 say mid August through November. Dominique helped draft</p> <p>11 maps and staff negotiations.</p> <p>12 Q (By Mr. Thrift-Viveros) As far as you know was there</p> <p>13 a particular reason that Dominique Meyers was brought on</p> <p>14 for redistricting work?</p> <p>15 A Yes.</p> <p>16 Q And what was that reason?</p> <p>17 A I was on medical leave.</p> <p>18 Q Okay. You don't have to go into particulars of the</p> <p>19 medical leave, but do you recall what the dates of your</p> <p>20 medical leave were?</p> <p>21 A I believe it began the first day of September and</p> <p>22 lasted a number of weeks.</p> <p>23 Q Okay. So do you believe you returned more or less</p> <p>24 at the end of September, beginning of October?</p> <p>25 A I believe it was in October that I returned.</p>	<p>1 Q Okay. And again, not to go into any particulars,</p> <p>2 but was this medical leave something you had planned</p> <p>3 before, or was it unexpected?</p> <p>4 A It was planned.</p> <p>5 Q Okay.</p> <p>6 A Yeah.</p> <p>7 Q And do you -- As far as you know was there a plan</p> <p>8 that Dominique Meyers would start working for</p> <p>9 Commissioner Sims when you went on leave when you were --</p> <p>10 first started on the Redistricting Commission?</p> <p>11 A No.</p> <p>12 Q Okay. And so when you went on leave would it be</p> <p>13 fair to characterize Dominique Meyers as like your</p> <p>14 replacement for when you were on leave or like a fill-in?</p> <p>15 A Yes.</p> <p>16 Q Okay. And when you returned from leave did</p> <p>17 Dominique Meyers continue working in the same capacity as</p> <p>18 she was when you were on your leave, as far as you know?</p> <p>19 A More or less we shared duties, so I imagine it</p> <p>20 looked slightly different than when I was completely out.</p> <p>21 Q Okay. Naturally.</p> <p>22 Did you report to Dominique Meyers, or would you</p> <p>23 still continue reporting to Commissioner Sims?</p> <p>24 A I reported to Commissioner Sims.</p> <p>25 Q And would Dominique Meyers report to you or to</p>

14 (Pages 53 to 56)

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

Osta Davis

August 19, 2022

Page 57	Page 58
<p>1 Commissioner Sims when you returned?</p> <p>2 A To Commissioner Sims.</p> <p>3 Q Okay. Would you communicate with Dominique Meyers</p> <p>4 on a regular basis and -- Sorry. Let me clarify that.</p> <p>5 On a daily basis?</p> <p>6 MS. GOLDMAN: Objection as to form.</p> <p>7 A To my recollection, yes, it was daily communication.</p> <p>8 Q (By Mr. Thrift-Viveros) Okay. And in the time that</p> <p>9 you had returned from your medical leave you were working</p> <p>10 with -- together with Dominique Meyers, were either -- did</p> <p>11 both of you work on mapmaking? On mapmaking.</p> <p>12 A Yes.</p> <p>13 Q Between you and Dominique Meyers did one of you draw</p> <p>14 more maps than the other?</p> <p>15 A I would have no way of knowing that.</p> <p>16 Q Okay. So it wasn't a sort of obvious disparity in</p> <p>17 the mapmaking between you and Dominique Meyers?</p> <p>18 MS. GOLDMAN: Objection, asked and</p> <p>19 answered.</p> <p>20 MS. FRANKLIN: Objection to form.</p> <p>21 A I wouldn't necessarily know.</p> <p>22 Q (By Mr. Thrift-Viveros) Okay. In terms of maps --</p> <p>23 Okay. Let me take that back.</p> <p>24 I just want to talk a little bit about your process</p> <p>25 for making maps and how you would work with</p>	<p>1 Commissioner Sims.</p> <p>2 So yeah, how did you -- How did you start drawing</p> <p>3 maps for the redistricting process?</p> <p>4 A We had different approaches at different times.</p> <p>5 Sometimes we would start with a particular region and then</p> <p>6 expand from there. Other times we would start with the</p> <p>7 maps that were produced from the 2011 Redistricting</p> <p>8 Commission and then adjust those existing maps.</p> <p>9 So I'd say it varied.</p> <p>10 Q And after let's say you drew a complete map of the</p> <p>11 legislative districts for the whole state, would you send</p> <p>12 that to Commissioner Sims, or would you do something else</p> <p>13 after you drew the maps?</p> <p>14 A I would generally be drawing maps on her request, so</p> <p>15 I would send them to Commissioner Sims.</p> <p>16 Q Okay. And did Commissioner Sims, would she</p> <p>17 generally say, "Thank you," or would she send them right</p> <p>18 back to you and say, "Can you adjust this or that?"</p> <p>19 A I wouldn't -- I can't recall.</p> <p>20 Q Okay. And we'll talk about some specific maps,</p> <p>21 also, but I just kind of want a general sense.</p> <p>22 So then after you would draw a map would you do any</p> <p>23 sort of analysis or anything, or would you be sending it</p> <p>24 directly to Commissioner Sims right away?</p> <p>25 MS. GOLDMAN: Objection, compound.</p>
Page 59	Page 60
<p>1 A I would primarily send maps from Dave's</p> <p>2 Redistricting App. On that platform there is a function</p> <p>3 that provides statistical analysis.</p> <p>4 Q (By Mr. Thrift-Viveros) Okay.</p> <p>5 A So that was included in the link.</p> <p>6 Q So you would draw the maps in Dave's Redistricting,</p> <p>7 and then would you send a link to the map to</p> <p>8 Commissioner Sims, --</p> <p>9 A Yes.</p> <p>10 Q -- generally?</p> <p>11 Did you ever draw maps in the Edge program?</p> <p>12 A No.</p> <p>13 Q Okay. As far as you know did Commissioner Sims draw</p> <p>14 maps in Dave's Redistricting?</p> <p>15 A My understanding was that she was familiar with the</p> <p>16 tools. I don't recall her ever drafting --</p> <p>17 Q Okay.</p> <p>18 A -- a complete map.</p> <p>19 Q And is that the same for -- Sorry.</p> <p>20 Do you know if Commissioner Sims drew maps in the</p> <p>21 Edge program?</p> <p>22 A No, she did not.</p> <p>23 Q Okay. And can you explain why the maps that you</p> <p>24 drew had to be uploaded to the Edge program?</p> <p>25 A The nonpartisan commissioners -- The nonpartisan</p>	<p>1 commission staff requested the maps to be in an Edge</p> <p>2 format to receive them.</p> <p>3 Q Okay.</p> <p>4 A The Edge program also had a more sophisticated</p> <p>5 analysis.</p> <p>6 Q And what do you mean by that, a more sophisticated</p> <p>7 analysis?</p> <p>8 A My understanding is that in the Edge program you</p> <p>9 could upload different election results, whereas Dave's</p> <p>10 Redistricting App had a preset number of election results</p> <p>11 that you could look at.</p> <p>12 Q Okay. And when you mentioned the nonpartisan</p> <p>13 commission staff, was there someone in particular that you</p> <p>14 would send these maps to for them to upload to -- or</p> <p>15 sorry. Let me take that back.</p> <p>16 Who from the nonpartisan commission staff requested</p> <p>17 maps from you?</p> <p>18 A The maps were sent to Justin Bennett.</p> <p>19 Q Okay. And what was his position?</p> <p>20 A I believe he was a GIS analyst.</p> <p>21 Q Okay. Do you know -- Do you know what would happen</p> <p>22 after you sent the maps to Mr. Bennett?</p> <p>23 MS. GOLDMAN: Objection, calls for</p> <p>24 speculation.</p> <p>25 MS. FRANKLIN: Objection, speculation.</p>

15 (Pages 57 to 60)

Osta Davis

August 19, 2022

<p style="text-align: right;">Page 61</p> <p>1 A My understanding is that he would upload and verify</p> <p>2 the maps and then work to post them publicly on the</p> <p>3 website.</p> <p>4 Q (By Mr. Thrift-Viveros) Okay. What do you mean by</p> <p>5 verify?</p> <p>6 A I don't recall.</p> <p>7 Q Okay. Was that a word that he used?</p> <p>8 A Yes, I believe so.</p> <p>9 Q Okay. After you submitted -- or about how many</p> <p>10 times if you recall did you submit maps to Mr. Bennett?</p> <p>11 A I believe we sent him maps in October when</p> <p>12 Commissioner Sims released a new map, as well as in</p> <p>13 November the final maps were sent to Justin Bennett.</p> <p>14 Q Okay. Did Justin Bennett send the maps back to you</p> <p>15 after you submitted it to him? Sorry, let me rephrase</p> <p>16 that.</p> <p>17 After you submitted the maps to Justin Bennett did</p> <p>18 he ever send them back to you and for any reason?</p> <p>19 A I don't recall.</p> <p>20 Q Okay. So as far as you know the maps that you sent</p> <p>21 to Justin Bennett were the maps that were posted by the</p> <p>22 commission?</p> <p>23 MS. GOLDMAN: Objection as to form.</p> <p>24 A Yes. And I would say that I personally did not send</p> <p>25 him the final map.</p>	<p style="text-align: right;">Page 62</p> <p>1 Q (By Mr. Thrift-Viveros) Okay.</p> <p>2 A I believe another staffer sent that map to him.</p> <p>3 Q Do you know which staffer sent the final map?</p> <p>4 A My assumption would be that it was Paul Campos</p> <p>5 because he had the most familiarity with Edge, but I can't</p> <p>6 say for sure. And in October it may have been our GIS</p> <p>7 analyst that sent that map to Justin Bennett.</p> <p>8 Q Okay. So you personally didn't send any maps to</p> <p>9 Justin Bennett, as far as you know?</p> <p>10 A It's hard for me to remember the exact chain of</p> <p>11 events.</p> <p>12 Q Yeah. Okay. And you said you assumed it was</p> <p>13 Paul Campos because of his familiarity with Edge.</p> <p>14 Are you basing your assumption on anything else?</p> <p>15 A No.</p> <p>16 Q Okay. Did you work with Paul Campos during the</p> <p>17 redistricting process?</p> <p>18 A Yes.</p> <p>19 Q In what capacity?</p> <p>20 A We both attended public meetings together. We</p> <p>21 attended weekly meetings with the Redistricting Commission</p> <p>22 nonpartisan staff. That was primarily the capacity in</p> <p>23 which we worked together.</p> <p>24 Q Did you work on maps together with Paul Campos?</p> <p>25 A Very little, but perhaps in November.</p>
<p style="text-align: right;">Page 63</p> <p>1 Q Um-hmm. As far as you know was Paul Campos the</p> <p>2 primary mapmaker for Commissioner Fain?</p> <p>3 A That was my understanding.</p> <p>4 Q Okay. And as far as you know did Commissioner Fain</p> <p>5 have any other staff members that worked on maps?</p> <p>6 A There was another woman who I believe was part of</p> <p>7 his team. I don't remember her name or job duties.</p> <p>8 Q Okay. And you mentioned that you have regular</p> <p>9 meetings with the nonpartisan staff of the Redistricting</p> <p>10 Commission; is that right?</p> <p>11 A Yes.</p> <p>12 Q How often were those meetings?</p> <p>13 A They were weekly, though as we got closer to the</p> <p>14 deadline I believe we didn't have those meetings.</p> <p>15 Q Oh, okay. And generally what did you -- or what did</p> <p>16 the attendees of those meetings discuss?</p> <p>17 A A number of things. I would say that primarily the</p> <p>18 executive director would brief us on potential agenda</p> <p>19 items for the upcoming Redistricting Commission meetings.</p> <p>20 Those meetings also included tutorials on the Edge</p> <p>21 software.</p> <p>22 Q Who would conduct those tutorials on the Edge</p> <p>23 software?</p> <p>24 A One tutorial was conducted by a man employed by</p> <p>25 Edge.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q Okay.</p> <p>2 A And then following that Justin Bennett provided a</p> <p>3 tutorial.</p> <p>4 Q Was it just those two tutorials?</p> <p>5 MS. GOLDMAN: Objection as to form.</p> <p>6 A Those are the only two I can recall.</p> <p>7 Q (By Mr. Thrift-Viveros) Okay. Do you recall what</p> <p>8 Justin Bennett talked about in his tutorial?</p> <p>9 A No.</p> <p>10 Q Okay. And so after you or another staff member</p> <p>11 would send maps to Justin Bennett on behalf of</p> <p>12 Commissioner Sims, would he ever send you any data back to</p> <p>13 you?</p> <p>14 MS. GOLDMAN: Objection, calls for</p> <p>15 speculation.</p> <p>16 A I can't recall.</p> <p>17 Q (By Mr. Thrift-Viveros) Okay. And would he ever</p> <p>18 send you back like a request for followup on a map?</p> <p>19 A I can't recall what he would send back, but he would</p> <p>20 generally acknowledge that he received the files.</p> <p>21 Q Okay. And did he ever ask for further analysis of a</p> <p>22 map?</p> <p>23 A That was not my understanding.</p> <p>24 Q Okay. And in those tutorials you mentioned do you</p> <p>25 recall who the attendees were of Justin Bennett's</p>

16 (Pages 61 to 64)

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

Osta Davis

August 19, 2022

Page 65	Page 66
<p>1 tutorial?</p> <p>2 A I believe it was primarily the staff person that was</p> <p>3 working most closely with each respective commissioner.</p> <p>4 Q Were the commissioners at that meeting, too, or --</p> <p>5 A No.</p> <p>6 Q -- at that tutorial?</p> <p>7 Okay. And in the tutorial led by the representative</p> <p>8 from Edge, do you recall who was present at that tutorial?</p> <p>9 A I believe it was the same group of people.</p> <p>10 Q Okay. And no commissioners?</p> <p>11 A No commissioners.</p> <p>12 Q Okay. And no one from outside of the commission</p> <p>13 staff?</p> <p>14 MS. GOLDMAN: Objection as to form, vague.</p> <p>15 A Well, the commission staff were employed by the</p> <p>16 respective caucuses, so they're technically outside of</p> <p>17 that; but I do not recall anyone that wasn't working on</p> <p>18 redistricting or working very closely with us.</p> <p>19 Q (By Mr. Thrift-Viveros) Okay. So it was you. It</p> <p>20 was Ali O'Neil. It was Paul Campos?</p> <p>21 A Yes.</p> <p>22 Q It was Anton Grose?</p> <p>23 A (Nodded.)</p> <p>24 Q Do you recall anyone else?</p> <p>25 A I believe Matt Bridges attended as well.</p>	<p>1 Q Okay. Both or -- both tutorials on Edge or just</p> <p>2 one?</p> <p>3 A I remember him attending the first one. I don't</p> <p>4 recall if he attended the one led by Justin Bennett.</p> <p>5 Q Okay. Did the tutorial only discuss the Autobound</p> <p>6 Edge software or anything else?</p> <p>7 A Just the software to my understanding of the</p> <p>8 technical jargon.</p> <p>9 Q Yeah. Did the Edge representative when they</p> <p>10 conducted the tutorial, did they discuss the racial</p> <p>11 shading tool in the Edge software; do you recall?</p> <p>12 A I don't recall.</p> <p>13 Q Did Justin Bennett in his tutorial discuss the</p> <p>14 racial shading software -- or tool, sorry -- in the</p> <p>15 software during his tutorial?</p> <p>16 A I don't recall.</p> <p>17 Q Okay. So if you could estimate a percentage of your</p> <p>18 work that involved mapmaking, like drawing maps, thinking</p> <p>19 about maps, looking at the maps, analyzing the maps, what</p> <p>20 percentage would you say, in general?</p> <p>21 A Again, I'd say before we received the census data it</p> <p>22 perhaps was about 40 percent of my job; and then following</p> <p>23 the receipt of the census data, if we include thinking</p> <p>24 about maps I would say that that was about 90 percent of</p> <p>25 my job.</p>
Page 67	Page 68
<p>1 Q Okay. And before you received the census data what</p> <p>2 set of data were you using? What were you -- Sorry.</p> <p>3 Before the census data did you use one set of data</p> <p>4 to draw your maps or multiple sets of data?</p> <p>5 MS. GOLDMAN: Objection, compound.</p> <p>6 A I believe there were multiple sets of data.</p> <p>7 Q (By Mr. Thrift-Viveros) Do you recall what sets of</p> <p>8 data you were using?</p> <p>9 A I remember using American Community Survey estimate</p> <p>10 data, as well as OFM, Office of Financial Management</p> <p>11 population estimates; though primarily for those I don't</p> <p>12 believe that I exported that into a mapping form, but I</p> <p>13 would reference that in the mapping process as well.</p> <p>14 Q The Office of Financial Management; is that --</p> <p>15 A (Nodded.)</p> <p>16 Q -- is that a state agency?</p> <p>17 A Yes.</p> <p>18 Q Okay. And do they release -- What information do</p> <p>19 they release that you relied on?</p> <p>20 A They release population estimates.</p> <p>21 Q Like by county or by --</p> <p>22 A My understanding is that it's by county, city,</p> <p>23 school district, legislative and congressional district.</p> <p>24 Q Okay. And do you know how they gather that</p> <p>25 information?</p>	<p>1 A No.</p> <p>2 Q And would they release these population estimates</p> <p>3 annually?</p> <p>4 A My --</p> <p>5 MS. GOLDMAN: Objection, calls for</p> <p>6 speculation.</p> <p>7 A My understanding is that they have annual estimates.</p> <p>8 Q (By Mr. Thrift-Viveros) Okay. And so when you were</p> <p>9 using the OFM population management estimate did you use</p> <p>10 it from a particular year?</p> <p>11 A Yes.</p> <p>12 Q What year was that?</p> <p>13 A My sense is that it would have been the most recent</p> <p>14 years, so depending on when it was released, that was</p> <p>15 likely 2020.</p> <p>16 Q Right. Okay. Did you use the OFM population</p> <p>17 management -- population estimates, did you use that</p> <p>18 throughout the entire process?</p> <p>19 A No.</p> <p>20 Q Did you -- When did you stop using them?</p> <p>21 A Once we received current census data.</p> <p>22 Q Okay. And why did you start using the current</p> <p>23 census data and not the OFM population management</p> <p>24 estimates?</p> <p>25 A Because the Redistricting Commission is required to</p>

17 (Pages 65 to 68)

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

Osta Davis

August 19, 2022

Page 69	Page 70
<p>1 map based on census data.</p> <p>2 Q Okay. And then ACS estimate data, do you recall</p> <p>3 what year you used for the ACS estimate data when you were</p> <p>4 using it?</p> <p>5 A My understanding was that it was 2019, but it may</p> <p>6 have been 2020.</p> <p>7 Q Okay. When you used the ACS estimate data would you</p> <p>8 use the five-year average or the single year set?</p> <p>9 A I don't recall.</p> <p>10 Q Okay. Did you continue using the ACS estimate data</p> <p>11 after you received the census data?</p> <p>12 A No.</p> <p>13 Q Okay. As far as you remember -- and this is just</p> <p>14 going at the five-year versus -- the five-year average</p> <p>15 versus the single -- did you use one set of ACS estimate</p> <p>16 data throughout the entire time that you were using ACS</p> <p>17 estimate data?</p> <p>18 MS. GOLDMAN: Objection, vague.</p> <p>19 A I don't recall.</p> <p>20 Q (By Mr. Thrift-Viveros) So you don't recall whether</p> <p>21 you might have used an average one time or a single year</p> <p>22 another time; you don't recall?</p> <p>23 A No.</p> <p>24 Q Okay. Do you recall if at any time in the</p> <p>25 redistricting process that you were using the ACS estimate</p>	<p>1 data if a new set from like the new year ACS estimate data</p> <p>2 came out, do you recall whether that --</p> <p>3 A No.</p> <p>4 Q Okay. So the map publicly posted by</p> <p>5 Commissioner Sims in September, did you draw that map?</p> <p>6 A No.</p> <p>7 Q Who drew that map?</p> <p>8 A Dominique Meyers.</p> <p>9 Q Okay. Did you contribute to that map?</p> <p>10 MS. GOLDMAN: Objection as to form, vague.</p> <p>11 A Not to the physical map.</p> <p>12 Q (By Mr. Thrift-Viveros) And the map released in</p> <p>13 October -- Sorry. Let me take that back.</p> <p>14 The map -- When the map was released by</p> <p>15 Commissioner Sims and prepared by Dominique Meyers in</p> <p>16 September, were you on medical leave when that map came</p> <p>17 out?</p> <p>18 A Yes.</p> <p>19 Q Okay. And the map posted by Commissioner Sims in</p> <p>20 October, did you draw that map?</p> <p>21 A I believe so.</p> <p>22 Q Okay. Did Dominique Meyers, also?</p> <p>23 A I believe that I primarily drew that map.</p> <p>24 Q Okay. For the map that you -- Sorry. Let me take</p> <p>25 that back.</p>
Page 71	Page 72
<p>1 For the map that was released by Commissioner Sims</p> <p>2 in October, did you generally draw that in Dave's</p> <p>3 Redistricting?</p> <p>4 A Yes.</p> <p>5 Q Okay. And did you share that with other staffers of</p> <p>6 the commission --</p> <p>7 A Yes.</p> <p>8 Q -- prior to the public posting?</p> <p>9 Okay. Do you recall which staffers?</p> <p>10 A I believe that that map was shared with</p> <p>11 Commissioner Walkinshaw's team and then shared with</p> <p>12 Justin Bennett so that he could post it.</p> <p>13 Q Okay. Did you share it with Commissioner</p> <p>14 Walkinshaw's team -- Sorry, let me take that back.</p> <p>15 Did you receive approval of the map from</p> <p>16 Commissioner Sims before you sent it to Commissioner</p> <p>17 Walkinshaw's team?</p> <p>18 A I believe so.</p> <p>19 Q Okay. We can take a break if you'd like.</p> <p>20 A No, it's --</p> <p>21 Q I know. I feel like the air is very dry in this</p> <p>22 room, so I'm very thirsty as well.</p> <p>23 So after you draw a map what sort of assessments or</p> <p>24 analysis would you do on that map?</p> <p>25 A We'd tend to look at the population variance between</p>	<p>1 each district, as well as we looked at electoral</p> <p>2 performance. On some maps we'd consider the number of</p> <p>3 cities or counties that were split. And we looked at the</p> <p>4 demographics of each district.</p> <p>5 Q When you say population variance, what does that</p> <p>6 mean?</p> <p>7 A The goal is to have the districts contain an equal</p> <p>8 population amongst all of the districts; but naturally</p> <p>9 it's impossible to have them have that variance be zero,</p> <p>10 so there would be some slight fluctuation in population</p> <p>11 from district to district.</p> <p>12 Q Did you personally have a sort of limit or a limit</p> <p>13 on how much variance there could be between each district?</p> <p>14 MS. GOLDMAN: Objection, vague.</p> <p>15 A No.</p> <p>16 Q (By Mr. Thrift-Viveros) Okay. Did Commissioner Sims</p> <p>17 have a maximum, like this is the maximum deviation from</p> <p>18 the population variance?</p> <p>19 A No. No.</p> <p>20 Q Okay. Did you have like a goal that you would try</p> <p>21 to hit of this is the maximum population variance between</p> <p>22 each district?</p> <p>23 A We didn't have a specific number.</p> <p>24 Q Okay. And then when you -- You mentioned you would</p> <p>25 look at electoral performance. Can you elaborate on that?</p>

18 (Pages 69 to 72)

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

Osta Davis

August 19, 2022

Page 73	Page 74
<p>1 What does that mean?</p> <p>2 A We would look at the performance of various</p> <p>3 candidates. We'd look at the performance that was</p> <p>4 uploaded in the Dave's Redistricting App. And we'd often</p> <p>5 look at the performance relative to the 2020 State</p> <p>6 Treasurer's race.</p> <p>7 Q Okay. So you said various candidates. Was there a</p> <p>8 specific -- Besides the 2020 State Treasurer's race was</p> <p>9 there specific races that you would look at when making</p> <p>10 these electoral performance analyses?</p> <p>11 A Dave's Redistricting App has some races that are</p> <p>12 preset, so we would see them naturally when we produced</p> <p>13 any map because that was displayed easily.</p> <p>14 Q Right. Do you recall what races? Was it</p> <p>15 presidential or county level?</p> <p>16 A I believe those races included governor's races as</p> <p>17 well as presidential.</p> <p>18 Q Okay. And just in a general sense you would look at</p> <p>19 a district, and it would say if this district were to vote</p> <p>20 in the 2020 presidential election, this many would vote</p> <p>21 for Biden. This many would vote for Trump.</p> <p>22 Is that what it would look like?</p> <p>23 A Yes. It used existing data, so I guess it was less</p> <p>24 would have, and this is how many had.</p> <p>25 Q Right. Okay. Yeah, you mentioned the 2020 State</p>	<p>1 Treasurer's race. How would you utilize that race in your</p> <p>2 electoral performance analyses?</p> <p>3 A We used that primarily when discussing districts</p> <p>4 with Commissioner Graves.</p> <p>5 Q Okay. Why specifically with Commissioner Graves?</p> <p>6 A Because that was an agreed upon metric.</p> <p>7 Q Do you know who agreed upon using that metric?</p> <p>8 A Commissioner Sims and Commissioner Graves.</p> <p>9 Q Okay. And did the other commissioners as far as you</p> <p>10 know use that metric?</p> <p>11 A No, that was not my understanding.</p> <p>12 Q Okay. As far as you know did the other</p> <p>13 commissioners use -- the other commissioners besides</p> <p>14 Graves and Sims use a different race for electoral</p> <p>15 performance?</p> <p>16 A I -- I don't know which data they used particularly.</p> <p>17 Q Okay. Do you know how Commissioner Sims and</p> <p>18 Commissioner Graves reached the agreement to use the 2020</p> <p>19 State Treasurer race?</p> <p>20 A Yes. I believe that the State Treasurer's race more</p> <p>21 closely reflected legislative performance in those</p> <p>22 districts.</p> <p>23 Q Do you know when Commissioner Sims and</p> <p>24 Commissioner Graves agreed on using that race as the</p> <p>25 metric?</p>
Page 75	Page 76
<p>1 A My sense is that was in October.</p> <p>2 Q Okay. And prior to that agreement do you know of</p> <p>3 any other agreement between Commissioners either Sims and</p> <p>4 Graves or Sims and any other commissioner to use a</p> <p>5 specific electoral race?</p> <p>6 A No.</p> <p>7 MS. GOLDMAN: Objection, compound.</p> <p>8 Q (By Mr. Thrift-Viveros) You don't know?</p> <p>9 A No.</p> <p>10 Q Okay. Do you know how that -- Sorry. You mentioned</p> <p>11 that your understanding is that the 2020 State Treasurer</p> <p>12 race was utilized because it more closely related to</p> <p>13 legislative races; is that correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. Do you know who made that determination that</p> <p>16 it was closely related to legislative races?</p> <p>17 A I know that I had analyzed the data and found that</p> <p>18 to be the case.</p> <p>19 Q And how did you -- or why did you analyze this data?</p> <p>20 Like -- Sorry.</p> <p>21 Did Commissioner Sims ask you to find an electoral</p> <p>22 race that looks -- that's closely related to the</p> <p>23 legislative districts?</p> <p>24 A I can't recall.</p> <p>25 Q Okay. And do you recall how you made that</p>	<p>1 determination? You mentioned you analyzed the data.</p> <p>2 Can you get any more specific?</p> <p>3 A I guess for mapping it is much easier to map based</p> <p>4 on statewide results rather than individual legislative</p> <p>5 races, and so in my recollection we looked at all of the</p> <p>6 legislative results for all of the individual legislators</p> <p>7 and compared them district by district to the performance</p> <p>8 of a number of candidates, including the State</p> <p>9 Treasurer's.</p> <p>10 Q And you looked at like governor's race, perhaps?</p> <p>11 A Yes.</p> <p>12 Q Okay. And then you determined that the State</p> <p>13 Treasurer's race was more closely aligned with the</p> <p>14 legislative district performance?</p> <p>15 A Yes.</p> <p>16 Q Sorry. Let me go back.</p> <p>17 Okay. You also mentioned that you would look at the</p> <p>18 cities and counties, the splitting of cities and counties.</p> <p>19 You would take that into consideration when you</p> <p>20 would draw your maps; is that correct?</p> <p>21 A Yes.</p> <p>22 Q Okay. Can you explain that to me? What would you</p> <p>23 look for? Or you would look for cities and counties being</p> <p>24 split, but what was sort of your thought process of how</p> <p>25 much is too much, or this is a justifiable amount of</p>

19 (Pages 73 to 76)

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

Osta Davis

August 19, 2022

Page 77	Page 78
<p>1 cities and counties being split?</p> <p>2 MS. GOLDMAN: Objection, compound.</p> <p>3 A One of the commissioners' directives that is set out</p> <p>4 in statute is to reduce the splits of cities, counties,</p> <p>5 municipalities, and so we held that directive with a</p> <p>6 number of priorities.</p> <p>7 Certain cities were too large to not be split.</p> <p>8 Q (By Mr. Thrift-Viveros) Do you recall what cities</p> <p>9 you made the determination had to be split, were too big</p> <p>10 to not be split?</p> <p>11 A The City of Seattle.</p> <p>12 Q Um-hmm. Any other cities?</p> <p>13 A Tacoma.</p> <p>14 Q Um-hmm. Any other cities?</p> <p>15 A I don't know if we came up with a list.</p> <p>16 Q Okay. But those are just kind of what you had in</p> <p>17 mind --</p> <p>18 A Yes.</p> <p>19 Q -- is we're going to have to split these up?</p> <p>20 Okay. What about counties? Were there any counties</p> <p>21 that you determined couldn't be kept whole, that they had</p> <p>22 to be split?</p> <p>23 MS. GOLDMAN: Object as to form, vague.</p> <p>24 A I mean, certainly all of the counties that exceeded</p> <p>25 the population of what a legislative district or</p>	<p>1 congressional district had to be population-wise</p> <p>2 necessarily required splitting.</p> <p>3 Q Okay. Going back to the 2020 State Treasurer's</p> <p>4 race, would you use that metric of that race to analyze</p> <p>5 every map that you created after it was agreed upon as the</p> <p>6 metric?</p> <p>7 Sorry. Did that make sense? Or I can rephrase.</p> <p>8 A I don't know if it was every map.</p> <p>9 Q Okay. Do you recall if that metric was agreed upon</p> <p>10 before or after the October map was released by</p> <p>11 Commissioner Sims publicly?</p> <p>12 A I don't recall.</p> <p>13 Q Do you recall if that agreement was made over email</p> <p>14 or in person or over Zoom, the agreement between Graves</p> <p>15 and Sims?</p> <p>16 A I remember it being agreed upon over Zoom.</p> <p>17 Q Okay. Were you at that meeting?</p> <p>18 A Yes.</p> <p>19 Q Okay. And did you like give a presentation on like</p> <p>20 your analyses, or did you explain why?</p> <p>21 A No.</p> <p>22 Q Okay. Did you suggest the 2020 State Treasurer's</p> <p>23 race, you personally?</p> <p>24 A Not during the meeting.</p> <p>25 Q Okay. But you did suggest it like to</p>
Page 79	Page 80
<p>1 Commissioner Sims prior to the meeting?</p> <p>2 A My understanding was that Commissioners Sims and</p> <p>3 Graves had been in communication before this meeting, --</p> <p>4 Q Okay.</p> <p>5 A -- and that I don't know what those conversations</p> <p>6 necessarily looked like.</p> <p>7 Q Okay. But the reason that they chose that -- As far</p> <p>8 as you know the reason that they chose that race was</p> <p>9 because of the analysis that you had done?</p> <p>10 MS. GOLDMAN: Objection, misstates the</p> <p>11 testimony.</p> <p>12 A I know that I had done that analysis. My assumption</p> <p>13 was that the Republicans had done their own analysis.</p> <p>14 Q (By Mr. Thrift-Viveros) Um-hmm.</p> <p>15 A So it would be hard to say that my analysis --</p> <p>16 Q Okay.</p> <p>17 A -- would have motivated Commissioner Graves in any</p> <p>18 way.</p> <p>19 Q Okay. I had one more question. Do you know why --</p> <p>20 -- Sorry.</p> <p>21 Were Commissioners Fain and Walkinshaw present at</p> <p>22 that meeting that Commissioner Graves and Sims agreed to</p> <p>23 use that race as their electoral performance metric?</p> <p>24 A No.</p> <p>25 Q Do you know if -- As far as you know was</p>	<p>1 Commissioner Walkinshaw consulted prior to this agreement</p> <p>2 to use this as the metric?</p> <p>3 A I don't remember.</p> <p>4 Q Okay. And what about if Commissioner Fain was</p> <p>5 consulted prior to this agreement?</p> <p>6 A I don't remember.</p> <p>7 Q Do you know why Commissioner Walkinshaw and</p> <p>8 Commissioner Fain were not included in this agreement?</p> <p>9 A Yes.</p> <p>10 Q Can you tell me why?</p> <p>11 A Because there was a decision to negotiate in dyads.</p> <p>12 Q Okay. Can you explain what a dyad is?</p> <p>13 A The commission defined the dyads as two</p> <p>14 commissioners of differing political parties.</p> <p>15 Q Okay. And how did that sort of dyad system work?</p> <p>16 Can you kind of generally explain to me?</p> <p>17 A Primarily Commissioner Sims and Commissioner Graves</p> <p>18 would negotiate in a dyad, and that Commissioners Fain and</p> <p>19 Walkinshaw would negotiate in a dyad.</p> <p>20 Q Okay. And were these dyads stable or the same</p> <p>21 throughout the redistricting process, as far as you know?</p> <p>22 A I guess I -- Certainly other commissioners talked</p> <p>23 together, talked to each other in groups of two; but as</p> <p>24 far as negotiating dyads, that was the primary structure</p> <p>25 throughout.</p>

20 (Pages 77 to 80)

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

Osta Davis

August 19, 2022

Page 81	Page 82
<p>1 Q Were these dyads assigned at the outset of the</p> <p>2 redistricting process or later on?</p> <p>3 A I believe later on.</p> <p>4 Q Okay. Do you recall more or less when?</p> <p>5 A No.</p> <p>6 Q Okay. Would you say that it happened before or</p> <p>7 after the release of the September maps?</p> <p>8 MS. GOLDMAN: Objection, vague.</p> <p>9 A I believe it occurred while I was on leave.</p> <p>10 Q (By Mr. Thrift-Viveros) Okay. Do you know who</p> <p>11 assigned -- Was there -- Sorry. Let me take that back.</p> <p>12 Was this dyad arrangement, do you know whose idea it</p> <p>13 was to come up with this dyad arrangement?</p> <p>14 A No.</p> <p>15 Q Okay. Do you know how say Commissioner Sims was</p> <p>16 assigned to be in a dyad with Commissioner Graves?</p> <p>17 MS. GOLDMAN: Objection, asked and</p> <p>18 answered.</p> <p>19 A No.</p> <p>20 Q (By Mr. Thrift-Viveros) Okay. Do you know why</p> <p>21 Commissioner Sims was in a dyad with Commissioner Graves</p> <p>22 and not Commissioner Fain?</p> <p>23 MS. GOLDMAN: Objection, asked and</p> <p>24 answered.</p> <p>25 A No.</p>	<p>1 Q (By Mr. Thrift-Viveros) Okay. So as part of this</p> <p>2 dyad agreement would you -- would Commissioner Sims and</p> <p>3 Commissioner Graves meet frequently?</p> <p>4 A Yes.</p> <p>5 Q About how often would you say?</p> <p>6 A It varied, but I'd say multiple times a week,</p> <p>7 generally.</p> <p>8 Q Okay. And would you attend these meetings usually?</p> <p>9 A Yes.</p> <p>10 Q Okay. And would the aide to Commissioner Graves</p> <p>11 attend those meetings regularly?</p> <p>12 A Yes.</p> <p>13 Q And that was Anton Grose; right?</p> <p>14 A Yes.</p> <p>15 Q Okay. So these meetings as part of the dyad would</p> <p>16 consist of Commissioner Sims, Commissioner Graves, you,</p> <p>17 Anton Grose. Anyone else?</p> <p>18 A Yes.</p> <p>19 Q Who else was there?</p> <p>20 A Dominique Meyers.</p> <p>21 Q Okay. Anyone else?</p> <p>22 A No.</p> <p>23 Q Okay. Was this dyad arrangement formalized</p> <p>24 anywhere, or -- as far as you know?</p> <p>25 A Not -- I don't believe it was.</p>
Page 83	Page 84
<p>1 Q Okay. It wasn't written anywhere, as far as you</p> <p>2 know?</p> <p>3 MS. GOLDMAN: Objection, asked and</p> <p>4 answered.</p> <p>5 A I don't know.</p> <p>6 Q (By Mr. Thrift-Viveros) Okay. Another thing you</p> <p>7 mentioned that you would look at when you were drawing</p> <p>8 maps and looking at the districts was the demographics was</p> <p>9 the word that you used.</p> <p>10 What do you mean by that, by demographics?</p> <p>11 A I believe primarily again we looked at the data that</p> <p>12 was in Dave's Redistricting App. So I believe they</p> <p>13 include racial and ethnic data, as well as age, I think.</p> <p>14 I don't remember if they include age or not.</p> <p>15 Q Okay. And how would you utilize that data when you</p> <p>16 would look at your maps?</p> <p>17 A We would generally look at how that data compared to</p> <p>18 the current existing maps.</p> <p>19 Q In what way?</p> <p>20 A Whether the demographics of certain districts</p> <p>21 shifted compared to their current district.</p> <p>22 Q And by shifted do you mean that a population, a</p> <p>23 certain ethnic population, for example, would increase or</p> <p>24 decrease?</p> <p>25 A Yes.</p>	<p>1 Q Okay. Would you -- I know Dave's -- Sorry. You</p> <p>2 mentioned Dave's Redistricting has multiple sets of data.</p> <p>3 When you would look at the demographics was there a</p> <p>4 specific set of data that you would utilize?</p> <p>5 A I believe they had a total population as well as a</p> <p>6 citizen voting age population.</p> <p>7 Q And would you utilize both of those sets of data?</p> <p>8 MS. GOLDMAN: Objection as to form.</p> <p>9 A Yes.</p> <p>10 Q (By Mr. Thrift-Viveros) Did you look at any other</p> <p>11 sets of data when you were analyzing your maps besides</p> <p>12 those two?</p> <p>13 A Yes.</p> <p>14 Q Do you recall which ones?</p> <p>15 A Election data.</p> <p>16 Q Okay. Do you recall anything else?</p> <p>17 A No.</p> <p>18 Q Okay. As far as you know did -- Strike that.</p> <p>19 Would other -- As far as you know would other staff</p> <p>20 members, such as Dominique Meyers or anyone else, any</p> <p>21 other staff members that you sent your maps to conduct</p> <p>22 analyses of your maps?</p> <p>23 MS. GOLDMAN: Objection, calls for</p> <p>24 speculation.</p> <p>25 A I don't know of that occurring.</p>

21 (Pages 81 to 84)

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

Osta Davis

August 19, 2022

Page 85	Page 86
<p>1 Q (By Mr. Thrift-Viveros) Okay. As far as you know</p> <p>2 would Dominique Meyers conduct analyses of the maps that</p> <p>3 she drew?</p> <p>4 MS. GOLDMAN: Objection, calls for</p> <p>5 speculation.</p> <p>6 A My understanding is that Dominique Meyers similarly</p> <p>7 drafted maps in Dave's Redistricting App, so she would</p> <p>8 have those preset analysis tools at her disposal as well.</p> <p>9 Q (By Mr. Thrift-Viveros) Okay. As far as you know</p> <p>10 did Commissioner Sims conduct analyses of the maps that</p> <p>11 you drew and submitted to her?</p> <p>12 A I believe Commissioner Sims would similarly look</p> <p>13 through and digest the data tables that were provided with</p> <p>14 the Dave's link to the map.</p> <p>15 Q Okay. Did you receive training on the legal</p> <p>16 requirements for a redistricting plan?</p> <p>17 MS. GOLDMAN: And that is a yes or no</p> <p>18 question, and the reason I'm telling you that is because</p> <p>19 the next question may result in a privilege instruction.</p> <p>20 A What constitutes training?</p> <p>21 Q (By Mr. Thrift-Viveros) Someone conducts a class, a</p> <p>22 training, a workshop, and they say, "When you are drawing</p> <p>23 maps these are the legal requirements that you have to</p> <p>24 fulfill."</p> <p>25 A No, I don't recall a formal training.</p>	<p>1 Q Okay. And so as far as you know, as far as you</p> <p>2 recall there was not a situation where you consulted with</p> <p>3 someone on the legal requirements of -- Sorry. Let me</p> <p>4 strike that.</p> <p>5 Did you or Commissioner Sims -- Did you -- Sorry.</p> <p>6 Did you consult with anyone on the legal</p> <p>7 requirements of a map?</p> <p>8 MS. GOLDMAN: That again is a yes or no</p> <p>9 question.</p> <p>10 A Yes.</p> <p>11 Q (By Mr. Thrift-Viveros) Okay. Do you recall who?</p> <p>12 A We met with Dr. Barreto.</p> <p>13 Q Okay. Do you recall meeting with anyone else on the</p> <p>14 legal requirements of a map that needed to be submitted by</p> <p>15 the commission?</p> <p>16 A I recall the commissioners receiving a briefing in</p> <p>17 an open public meeting from I believe the Attorney</p> <p>18 General's Office.</p> <p>19 Q Okay. And this was an open public meeting, you</p> <p>20 said?</p> <p>21 A Yes.</p> <p>22 Q Okay. And as far as you know members of the public</p> <p>23 attended this meeting?</p> <p>24 A Yes.</p> <p>25 Q Do you recall who gave that presentation?</p>
Page 87	Page 88
<p>1 A No.</p> <p>2 Q Okay. But you do recall it was an attorney from the</p> <p>3 Attorney General's Office?</p> <p>4 A That was my understanding.</p> <p>5 Q Okay. Do you recall when that was?</p> <p>6 A I believe it was in the spring.</p> <p>7 Q Okay. And do you recall if that presentation</p> <p>8 included a discussion of the Voting Rights Act?</p> <p>9 A I believe that it exclusively involved the Voting</p> <p>10 Rights Act.</p> <p>11 Q Okay. And do you recall if all the commissioners</p> <p>12 were present at that meeting?</p> <p>13 A No.</p> <p>14 Q Sorry. That was part of my question fault, but is</p> <p>15 that no, that you don't recall, or that not all the</p> <p>16 commissioners were present at the meeting?</p> <p>17 MS. GOLDMAN: Objection, compound.</p> <p>18 A I don't recall if all of the --</p> <p>19 Q (By Mr. Thrift-Viveros) Okay.</p> <p>20 A -- commissioners were present.</p> <p>21 Q Was Commissioner Sims present at that meeting?</p> <p>22 A Yes.</p> <p>23 Q Okay. Do you recall what was stated as requirements</p> <p>24 for the Voting Rights Act?</p> <p>25 A Can you repeat the question?</p>	<p>1 Q Um-hmm. At this presentation at the open public</p> <p>2 meeting that you attended with an attorney from the</p> <p>3 Attorney General's Office, do you recall what they said</p> <p>4 were the legal requirements of the Voting Rights Act as it</p> <p>5 pertains to the maps that you were drawing?</p> <p>6 A In broad strokes, yes.</p> <p>7 Q Okay. Do you recall them now?</p> <p>8 A In broad strokes, yes.</p> <p>9 Q Can you give me some -- the broad strokes?</p> <p>10 A My understanding is that if there is the existence</p> <p>11 of racially polarized voting amongst a population large</p> <p>12 enough and compact enough, that districts should be drawn</p> <p>13 to allow for the minority community to elect their</p> <p>14 candidate of choice.</p> <p>15 Q Okay.</p> <p>16 A And that it was also illegal to draw districts on</p> <p>17 the basis of race.</p> <p>18 Q Okay. You mentioned if the minority population is</p> <p>19 large enough and compact enough.</p> <p>20 What do you understand those to mean?</p> <p>21 MS. GOLDMAN: Objection, calls for a legal</p> <p>22 conclusion.</p> <p>23 A My understanding in my own opinion is that it would</p> <p>24 mean that the geographic constraints would make it</p> <p>25 possible to draw a district that also respected the rule</p>

22 (Pages 85 to 88)

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

Osta Davis

August 19, 2022

Page 89	Page 90
<p>1 of roughly equal population amongst the districts.</p> <p>2 Q (By Mr. Thrift-Viveros) Do you base your</p> <p>3 understanding of the requirements of the Voting Rights Act</p> <p>4 under -- Sorry. Do you -- yeah.</p> <p>5 Your understanding of the Voting Rights Act and the</p> <p>6 legal requirements as it applies to the maps that you</p> <p>7 drew, do you base your understanding on anything else</p> <p>8 other than that open public meeting with the attorney from</p> <p>9 the Attorney General's Office and that meeting you had</p> <p>10 with Dr. Barreto?</p> <p>11 MS. GOLDMAN: That's a yes or no question.</p> <p>12 MR. THRIFT-VIVEROS: That's true, it is.</p> <p>13 A No.</p> <p>14 Q (By Mr. Thrift-Viveros) Okay. Are you certain?</p> <p>15 A Can you repeat the question again?</p> <p>16 Q Yeah. So you mentioned to me -- I asked do you base</p> <p>17 this -- Sorry. I asked what you base your understanding</p> <p>18 of the Voting Rights Act. Sorry. Let me take that back.</p> <p>19 I asked you who you consulted with on the legal</p> <p>20 requirements of the Voting Rights Act as it applied to</p> <p>21 your maps, and you answered Dr. Barreto and this open</p> <p>22 public meeting with the attorney from the Attorney</p> <p>23 General's Office; is that correct?</p> <p>24 A That is correct.</p> <p>25 Q Okay. And then now I'm asking you are you basing</p>	<p>1 your understanding of the requirements of the Voting</p> <p>2 Rights Act on anything else other than your talks with</p> <p>3 Dr. Barreto and with this meeting with the Attorney</p> <p>4 Generals?</p> <p>5 A Yes.</p> <p>6 Q Okay. And what is that?</p> <p>7 A I believe I attended a webinar put on by the</p> <p>8 National Conference of State Legislatures --</p> <p>9 Q Okay.</p> <p>10 A -- that discussed the Voting Rights Act as well.</p> <p>11 Q Do you recall when that webinar was?</p> <p>12 A I believe that was in January of 2021.</p> <p>13 Q Okay. So it was before you were hired?</p> <p>14 A Yes.</p> <p>15 Q Okay. So did you take steps to assess the</p> <p>16 compliance of your maps with -- Sorry. Yes.</p> <p>17 Did you take steps to assess the compliance of your</p> <p>18 maps with the Voting Rights Act?</p> <p>19 A No.</p> <p>20 Q Do you know if anyone else took steps to ensure --</p> <p>21 or sorry. Strike that.</p> <p>22 Do you know if anyone else took steps to assess the</p> <p>23 compliance of your maps with the Voting Rights Act?</p> <p>24 MS. GOLDMAN: Objection, calls for</p> <p>25 speculation.</p>
Page 91	Page 92
<p>1 MS. FRANKLIN: Objection, lack of</p> <p>2 foundation.</p> <p>3 Q (By Mr. Thrift-Viveros) You can answer.</p> <p>4 A My understanding -- or I believe that Dr. Barreto</p> <p>5 analyzed the maps.</p> <p>6 Q Okay. Is there a reason why you did not take steps</p> <p>7 to assess the compliance of your maps with the</p> <p>8 requirements of the Voting Rights Act?</p> <p>9 A No.</p> <p>10 Q Okay. Did anyone tell you that you should assess</p> <p>11 your maps to see if they comply with the Voting Rights</p> <p>12 Act?</p> <p>13 A I don't remember --</p> <p>14 Q Okay.</p> <p>15 A -- that specific instruction to me.</p> <p>16 Q Okay. So you do not -- So Commissioner Sims, as far</p> <p>17 as -- Strike that.</p> <p>18 As far as you remember did Commissioner Sims tell</p> <p>19 you, "Let's ensure that these maps are compliant with the</p> <p>20 Voting Rights Act"?</p> <p>21 A I don't remember.</p> <p>22 Q Okay. Do you remember discussions with</p> <p>23 Commissioner Sims on the Voting Rights Act?</p> <p>24 A Yes.</p> <p>25 Q Okay. Can you tell me what you discussed?</p>	<p>1 MS. GOLDMAN: And here I'm going to counsel</p> <p>2 you to the degree that any of those conversations involved</p> <p>3 a lawyer for the legislature or for the Democratic -- for</p> <p>4 the House Democratic Caucus or for the commission, I'm</p> <p>5 instructing you not to answer.</p> <p>6 If none of those -- If there were such conversations</p> <p>7 that did not include those lawyers, you may answer as to</p> <p>8 the latter.</p> <p>9 MR. THRIFT-VIVEROS: Sorry. I just want to</p> <p>10 ask in this objection are you discussing not her lawyers,</p> <p>11 like lawyers for the legislature is what you're saying?</p> <p>12 MS. GOLDMAN: I'm saying lawyers for the</p> <p>13 commission, lawyers for the House Democratic Caucus, any</p> <p>14 other lawyers, the legislative lawyers --</p> <p>15 MR. THRIFT-VIVEROS: Okay.</p> <p>16 MS. GOLDMAN: -- who were providing legal</p> <p>17 advice.</p> <p>18 Q (By Mr. Thrift-Viveros) So this question I'm asking</p> <p>19 in your conversations with Commissioner Sims what did you</p> <p>20 discuss about the Voting Rights Act?</p> <p>21 MS. GOLDMAN: Subject to my instruction.</p> <p>22 A I think we discussed opinions that Commissioner</p> <p>23 Graves had regarding the Voting Rights Act. I believe we</p> <p>24 discussed or -- that neither of us are attorneys and</p> <p>25 wouldn't necessarily be able to know 100 percent one way</p>

23 (Pages 89 to 92)

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

Osta Davis

August 19, 2022

Page 93	Page 94
<p>1 or the other what compliance would look like.</p> <p>2 Q (By Mr. Thrift-Viveros) Can you elaborate on what</p> <p>3 you mean by the opinions of Commissioner Graves on the</p> <p>4 Voting Rights Act?</p> <p>5 A I believe that Commissioner Graves released a memo</p> <p>6 from attorneys that he had hired regarding the issue.</p> <p>7 That's my recollection.</p> <p>8 Q Okay. So when you said that you would discuss with</p> <p>9 Commissioner Sims the opinions of Commissioner Graves on</p> <p>10 the Voting Rights Act, are you just referring to the memo,</p> <p>11 or are you also referring to something else?</p> <p>12 A My recollection, it was concerning the memo or his</p> <p>13 comments summarizing the memo.</p> <p>14 Q Do you remember what the memo said?</p> <p>15 A No.</p> <p>16 Q Okay. And then the other thing you mentioned is</p> <p>17 that in your conversations with Commissioner Sims you</p> <p>18 discussed that, you know, neither of you are attorneys, so</p> <p>19 you won't be sure one way or another on complete</p> <p>20 compliance.</p> <p>21 Did you discuss hiring an attorney to help you</p> <p>22 comply or to help guide you through these issues?</p> <p>23 A I can't remember.</p> <p>24 Q Okay. Do you remember if not necessarily hiring an</p> <p>25 attorney, but consulting with an attorney from the caucus</p>	<p>1 or from elsewhere, did you discuss that?</p> <p>2 A I remember conversations with attorneys that worked</p> <p>3 for the caucus regarding the Voting Rights Act.</p> <p>4 Q Sorry. You discussed with these attorneys, or you</p> <p>5 discussed with Commissioner Sims that you both would want</p> <p>6 to discuss with these attorneys?</p> <p>7 MS. GOLDMAN: Objection, compound.</p> <p>8 A I remember having a conversation with an attorney</p> <p>9 regarding the Voting Rights Act.</p> <p>10 Q (By Mr. Thrift-Viveros) Do you know that attorney's</p> <p>11 name?</p> <p>12 A Alec Osenbach.</p> <p>13 Q Do you know where Alec Osenbach works?</p> <p>14 A The House Democratic Caucus.</p> <p>15 Q Okay. Do you recall how many times you met with</p> <p>16 Mr. Osenbach?</p> <p>17 A No.</p> <p>18 Q Was it more than once?</p> <p>19 A Yes.</p> <p>20 Q Was it more than ten times?</p> <p>21 A I don't recall.</p> <p>22 Q Okay. When you would meet with Alec Osenbach was it</p> <p>23 just you, or was it you and someone else?</p> <p>24 A I remember generally meeting with him with others</p> <p>25 present as well.</p>
Page 95	Page 96
<p>1 Q And when you say generally -- I'm sorry.</p> <p>2 Generally others present would mean who?</p> <p>3 A It's my recollection I believe Dominique Meyers may</p> <p>4 have been present. I remember a meeting where the chief</p> <p>5 of staff was present.</p> <p>6 Q Sorry to interrupt. Who is the chief of staff?</p> <p>7 A At the time the chief of staff was Alex MacBain.</p> <p>8 Q And he's the chief of staff for the caucus or for</p> <p>9 the House?</p> <p>10 A For the Speaker.</p> <p>11 Q Oh, for the Speaker? Okay.</p> <p>12 And then who else? Sorry. Dominique Meyers, Alex,</p> <p>13 chief of staff.</p> <p>14 A Amy Ruble.</p> <p>15 Q And what's her position?</p> <p>16 A I believe her role is Senior Tribal Liaison, but I'm</p> <p>17 not sure if that's the official title.</p> <p>18 Q And who does she work for?</p> <p>19 A The House Democratic Caucus.</p> <p>20 Q Okay. Anyone else you can remember at those</p> <p>21 meetings?</p> <p>22 A I believe our GIS analyst may have attended a</p> <p>23 meeting.</p> <p>24 Q And when you say "our GIS analyst," you mean for</p> <p>25 Commissioner Sims?</p>	<p>1 A Commissioner Sims.</p> <p>2 Q Do you recall anyone else?</p> <p>3 A No.</p> <p>4 Q Okay. Were -- Sorry. I didn't catch the chief of</p> <p>5 staff of the Speaker's last name. Alex, what was it?</p> <p>6 A MacBain.</p> <p>7 Q MacBain. Okay.</p> <p>8 A I believe it's M-A-C-B-A-I-N.</p> <p>9 Q MacBain. Okay.</p> <p>10 Did you have discussions with Alex MacBain about</p> <p>11 redistricting?</p> <p>12 A Yes.</p> <p>13 Q About how often would you speak with Alex MacBain</p> <p>14 about redistricting?</p> <p>15 A A small handful of times.</p> <p>16 Q Do you think that's more than ten times?</p> <p>17 A No.</p> <p>18 Q More than five times?</p> <p>19 A No.</p> <p>20 Q So fewer than five times would you say?</p> <p>21 A Yeah.</p> <p>22 Q Okay. Would you -- As far as you know would you</p> <p>23 characterize Alex MacBain as being heavily involved in the</p> <p>24 redistricting process?</p> <p>25 A No.</p>

24 (Pages 93 to 96)

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

Osta Davis

August 19, 2022

Page 97	Page 98
<p>1 Q Do you know if Alex MacBain would talk with</p> <p>2 Commissioner Sims about the redistricting process?</p> <p>3 A No, not to my knowledge.</p> <p>4 Q To your knowledge did Alex MacBain talk with</p> <p>5 Commissioner Walkinshaw about the redistricting process?</p> <p>6 A No.</p> <p>7 Q And as far as you know did Alex MacBain talk with</p> <p>8 Ali O'Neil about the redistricting process?</p> <p>9 A No, I don't believe so.</p> <p>10 Q Okay. And when you did speak with Alex MacBain</p> <p>11 about the redistricting process did you discuss the Voting</p> <p>12 Rights Act compliance?</p> <p>13 A I don't believe so.</p> <p>14 Q Okay. Do you recall the conversations that you had</p> <p>15 with Alex MacBain about redistricting?</p> <p>16 A Vaguely.</p> <p>17 Q Do you remember what you talked about?</p> <p>18 MS. GOLDMAN: And here I'm just going to</p> <p>19 counsel you that to the degree that those conversations</p> <p>20 with Alex MacBain happened with an attorney present</p> <p>21 providing legal advice, including Alec Osenbach, I'm</p> <p>22 instructing you not to answer.</p> <p>23 If you can otherwise answer, please do.</p> <p>24 A Yeah, I believe -- I believe we talked about</p> <p>25 dynamics between the House and Senate.</p>	<p>1 Q (By Mr. Thrift-Viveros) Okay. What does that mean?</p> <p>2 A I believe to my recollection I may have given him an</p> <p>3 update about the process and discussed the opinions that</p> <p>4 were held by members in the House and Senate.</p> <p>5 Q Okay. Did you speak with members of the House about</p> <p>6 redistricting?</p> <p>7 A Yes.</p> <p>8 Q About how many members of the House?</p> <p>9 A About 55.</p> <p>10 Q How many members of the House are there?</p> <p>11 A I believe there are 56.</p> <p>12 Q Okay. Sorry. These are members of the House</p> <p>13 Democratic Caucus?</p> <p>14 A Yes.</p> <p>15 Q Okay. Was there a particular one that you didn't</p> <p>16 talk to?</p> <p>17 A I believe I didn't talk to Representative</p> <p>18 Sharon Wylie.</p> <p>19 Q Is there a reason why?</p> <p>20 A She didn't show up to our scheduled meeting time.</p> <p>21 Q Okay. So 55. And then did you ever meet with</p> <p>22 members of the Senate?</p> <p>23 A Yes.</p> <p>24 Q About how many?</p> <p>25 A Maybe three or four.</p>
Page 99	Page 100
<p>1 Q Okay. Would you meet with -- In general did you</p> <p>2 conduct these meetings on your own or with</p> <p>3 Commissioner Sims?</p> <p>4 A With Commissioner Sims.</p> <p>5 Q Was as far as you recall Commissioner Sims present</p> <p>6 at all of these meetings?</p> <p>7 A Yes.</p> <p>8 Q Okay. And in general -- I know this is a lot of</p> <p>9 meetings, but in general what were topics of conversation</p> <p>10 for these meetings?</p> <p>11 A Generally we were aiming to get the legislators'</p> <p>12 insight into their communities, how they have changed or</p> <p>13 perceived them to have changed over the last ten years.</p> <p>14 We asked about notable characteristics of the</p> <p>15 district -- universities, hospitals -- and that was</p> <p>16 primarily the focus.</p> <p>17 Q Did you ever show draft maps to members of the</p> <p>18 legislature?</p> <p>19 A I believe that I would pull up the existing map, but</p> <p>20 I don't recall ever providing draft iterations.</p> <p>21 Q By existing map you mean like the map that was --</p> <p>22 A The twenty -- The map that was in effect in 2021.</p> <p>23 Q Okay. Do you know whether Commissioner Sims showed</p> <p>24 draft maps to members of the legislature?</p> <p>25 A I believe so.</p>	<p>1 Q Okay. Do you know which members of the legislature?</p> <p>2 A I believe draft maps were shared with Representative</p> <p>3 Joe Fitzgibbon.</p> <p>4 Q Do you remember any other legislators?</p> <p>5 A I don't remember any others.</p> <p>6 Q Okay. Do you know if Commissioner Sims presented</p> <p>7 the draft map to Joe Fitzgibbon by email or in person?</p> <p>8 A My understanding is that it would have been by</p> <p>9 email.</p> <p>10 Q Okay. And when you met with the three or four</p> <p>11 senators what were the general topics that you would talk</p> <p>12 about?</p> <p>13 A I believe Senator -- Republican Senator Brad Hawkins</p> <p>14 met with Commissioner Sims and I to talk about broadly the</p> <p>15 Wenatchee region and his ties to Central Washington</p> <p>16 University.</p> <p>17 Q Do you recall any other conversations with senators?</p> <p>18 A Yes.</p> <p>19 Q And what happened in those conversations?</p> <p>20 A I recall meeting with Senator Jamie Pedersen as well</p> <p>21 as Majority Leader Billig.</p> <p>22 Q And what did you discuss in those meetings?</p> <p>23 A I believe that we discussed timelines and</p> <p>24 negotiation strategies primarily.</p> <p>25 Q Okay. Did you share draft maps with any of the</p>

25 (Pages 97 to 100)

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

Osta Davis

August 19, 2022

Page 101	Page 102
<p>1 senators that you met with?</p> <p>2 A No.</p> <p>3 Q Do you know if Commissioner Sims shared draft maps</p> <p>4 with any of the senators that you met with?</p> <p>5 A No, I don't know.</p> <p>6 Q Okay. Did you generally talk about the reelection</p> <p>7 chances of the legislators in their districts?</p> <p>8 MS. GOLDMAN: Objection, vague.</p> <p>9 A No.</p> <p>10 Q (By Mr. Thrift-Viveros) Okay. And you said earlier</p> <p>11 that you met with Dr. Barreto; is that correct?</p> <p>12 A Yes.</p> <p>13 Q Who was at that meeting?</p> <p>14 A I believe I met with Dr. Barreto with Ali O'Neil,</p> <p>15 Commissioner Sims, Dominique Meyers, Adam with the last</p> <p>16 name I can't remember. And there may have been others.</p> <p>17 Q Do you recall when that meeting was?</p> <p>18 A October.</p> <p>19 Q So Dr. Barreto released the presentation on</p> <p>20 October 19th. Do you recall -- It was like a presentation</p> <p>21 report.</p> <p>22 Do you recall reading that report?</p> <p>23 A Yes.</p> <p>24 Q Did you meet with -- Did you have this meeting with</p> <p>25 him before or after that report was released?</p>	<p>1 A This meeting was before --</p> <p>2 Q Okay.</p> <p>3 A -- it was publicly released.</p> <p>4 Q Okay. What do you recall from the meeting with</p> <p>5 Dr. Barreto?</p> <p>6 A I remember the meeting primarily being him</p> <p>7 presenting his slide deck that he went on to release.</p> <p>8 Q Okay. And what do you recall from that</p> <p>9 presentation?</p> <p>10 A I recall the analysis he did. I recall he had a</p> <p>11 surname analysis tool that he utilized. There were a</p> <p>12 number of graphs, and I believe there were a number of --</p> <p>13 or a couple of proposed draft maps --</p> <p>14 Q Okay.</p> <p>15 A -- in the Yakima Valley region.</p> <p>16 Q Did you discuss his presentation with anyone else?</p> <p>17 Did you discuss his presentation with anyone?</p> <p>18 A Outside of the meeting?</p> <p>19 Q Or those in the meeting, but yeah, outside of the</p> <p>20 meeting, with anyone.</p> <p>21 MS. GOLDMAN: Objection, compound.</p> <p>22 A Not that I recall.</p> <p>23 Q (By Mr. Thrift-Viveros) Okay. So even of the folks</p> <p>24 in the meeting, you don't recall discussing the meeting</p> <p>25 with them outside of the meeting?</p>
Page 103	Page 104
<p>1 A I remember having a question and answer time in the</p> <p>2 meeting --</p> <p>3 Q Yeah.</p> <p>4 A -- where we discussed the material.</p> <p>5 Q Do you recall any of the questions that were asked?</p> <p>6 A No.</p> <p>7 Q Okay. Did you ask any questions, do you remember?</p> <p>8 A I don't recall. I don't believe so.</p> <p>9 Q Okay. And you mentioned Dr. Barreto's analysis of</p> <p>10 the surnames. Did you ever conduct a surname analysis for</p> <p>11 any of your maps?</p> <p>12 A No.</p> <p>13 Q Okay. Do you know if anyone else on the commission</p> <p>14 conducted a surname analysis on the maps?</p> <p>15 A No.</p> <p>16 Q Okay. I have a couple emails here, and then I'm</p> <p>17 just going to ask you a few questions about this email</p> <p>18 first. Here's one. And then --</p> <p>19 MS. GOLDMAN: Can I have one, please?</p> <p>20 MR. THRIFT-VIVEROS: There's a --</p> <p>21 MS. GOLDMAN: One is the exhibit.</p> <p>22 MR. THRIFT-VIVEROS: Yeah, one is the</p> <p>23 exhibit. Sorry.</p> <p>24 There's a Dave's Redistricting link that I can drop</p> <p>25 into the chat, and we can open it up.</p>	<p>1 MS. GOLDMAN: Are you going to mark this?</p> <p>2 MR. THRIFT-VIVEROS: Well, I'm going to ask</p> <p>3 Osta a couple questions, but yeah, we can mark it as</p> <p>4 Exhibit 1.</p> <p>5 (Davis Exhibit No. 1 introduced.)</p> <p>6 Q (By Mr. Thrift-Viveros) So Osta, is that your name</p> <p>7 at the top?</p> <p>8 A Yes.</p> <p>9 Q And do you recall sending this email, after you have</p> <p>10 a chance to read through it?</p> <p>11 MR. HOLT: Is there a chance that digital</p> <p>12 copies of the emails can be put in the chat box?</p> <p>13 MR. HERRERA: I'll do it.</p> <p>14 MR. THRIFT-VIVEROS: Yeah, I'm trying to</p> <p>15 figure that out right know. Sorry.</p> <p>16 MR. HOLT: No, you're fine. I just</p> <p>17 couldn't see what was going on there, so I apologize.</p> <p>18 MR. THRIFT-VIVEROS: The October 19th</p> <p>19 emails.</p> <p>20 MR. HERRERA: I'll pull it up.</p> <p>21 MR. THRIFT-VIVEROS: Great.</p> <p>22 A Yes.</p> <p>23 MR. THRIFT-VIVEROS: Okay. And we'll let</p> <p>24 Ernest share in the chat first so all the remote attendees</p> <p>25 can take a look. And also I'm going to screen share it so</p>

26 (Pages 101 to 104)

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

Osta Davis

August 19, 2022

Page 105	Page 106
<p>1 that we can open the Dave's Redistricting link on my 2 computer. So I did a printout, but I'd rather look at the 3 link. Thank you, Ernest.</p> <p>4 MS. GOLDMAN: Counsel, may I ask you a 5 question?</p> <p>6 MR. THRIFT-VIVEROS: Yes.</p> <p>7 MS. GOLDMAN: So this is a two-page 8 document. So is the attachment where you're going to on 9 the link?</p> <p>10 MR. THRIFT-VIVEROS: Yes.</p> <p>11 MS. GOLDMAN: Okay. Thank you.</p> <p>12 MR. THRIFT-VIVEROS: And I'm going to pull 13 up the link on --</p> <p>14 MS. GOLDMAN: Would you mind showing us the 15 email so we can watch you go from the link?</p> <p>16 MR. THRIFT-VIVEROS: Yes.</p> <p>17 MS. GOLDMAN: Thank you.</p> <p>18 MR. THRIFT-VIVEROS: That's what I'm doing 19 right now, as soon as I figure it out.</p> <p>20 MS. GOLDMAN: Thanks.</p> <p>21 MR. THRIFT-VIVEROS: Great. Are you seeing 22 my email?</p> <p>23 MS. GOLDMAN: Yes.</p> <p>24 MR. THRIFT-VIVEROS: Are you seeing any 25 privileged information?</p>	<p>1 MS. GOLDMAN: No.</p> <p>2 MR. THRIFT-VIVEROS: Okay. Just making 3 sure.</p> <p>4 Q (By Mr. Thrift-Viveros) Okay. So before we open the 5 Dave's Redistricting link do you recall sending this 6 email, Osta?</p> <p>7 A Yes.</p> <p>8 Q Okay. And so you wrote, "Here's an updated VRA 9 version of the map."</p> <p>10 What do you mean by VRA version, or what did you 11 mean?</p> <p>12 A I believe I meant a version that incorporated the 13 information from Dr. Barreto's presentation.</p> <p>14 Q Okay. And VRA means Voting Rights Act?</p> <p>15 A Yes.</p> <p>16 Q Okay. Do you recall specifically what you tried to 17 incorporate or what you incorporated from Dr. Barreto's 18 presentation when drawing this map?</p> <p>19 A No.</p> <p>20 Q Okay. So I'm going to open the link that is 21 contained in this email, and I'll wait for it to load; 22 but yeah, we can go back to the email.</p> <p>23 You wrote, "The VRA district is 51.7 percent 24 Hispanic CVAP and a total VAP of 76.34 percent."</p> <p>25 What do you mean or what did you mean by VRA</p>
Page 107	Page 108
<p>1 district?</p> <p>2 A I meant district that we redrew based on the 3 presentation from Dr. Barreto.</p> <p>4 Q Okay. And when you were -- When you redrew this 5 district what consideration per -- Sorry.</p> <p>6 So you mentioned that you were redrawing the 7 district based on Dr. Barreto's report. Do you recall 8 what factors or what criteria you had in mind when you 9 were redrawing this district?</p> <p>10 A I remember a goal not related to the VRA, but a goal 11 was to have the Yakama Nation Reservation as intact as 12 possible.</p> <p>13 Q And why was that a goal?</p> <p>14 A We had conducted a consultation with the Yakama 15 Nation, and they had stated that as a priority of theirs.</p> <p>16 Q Okay. When you were redrawing this map in district 17 were you taking into consideration the Hispanic citizen 18 voting age population of the area?</p> <p>19 A Yes, I did consider that.</p> <p>20 Q Okay. Did you conduct -- Sorry. Did you conduct a 21 racially polarized voting analysis on this district?</p> <p>22 A No.</p> <p>23 Q Did you conduct a racially polarized voting analysis 24 on any of the districts in this map?</p> <p>25 A No.</p>	<p>1 Q Okay. Do you know if this is the map that was 2 released by Commissioner Sims publicly posted?</p> <p>3 A I do not know.</p> <p>4 Q Okay. Was part of -- So you mentioned that when you 5 were redrawing this map one of your goals was keeping the 6 Yakama Indian Reservation whole, and then also a majority 7 Hispanic CVAP.</p> <p>8 Was it your goal to put them into the same district?</p> <p>9 MS. GOLDMAN: Objection, misstates the 10 testimony.</p> <p>11 A Not necessarily. We attended the presentation with 12 members of Commissioner Walkinshaw's team, and one of the 13 goals was to have similar districts with the Senate.</p> <p>14 Q (By Mr. Thrift-Viveros) Sorry. Can you explain 15 that? You said similar districts with the Senate?</p> <p>16 A With Commissioner Walkinshaw's team, and he was 17 appointed by the Senate.</p> <p>18 Q Oh, gotcha. Okay.</p> <p>19 Do you recall -- Sorry. Let me strike that.</p> <p>20 This meeting with the Yakama Nation, who did you 21 meet with from the Yakama Nation?</p> <p>22 A We met with their Tribal Council.</p> <p>23 Q About how many people are on the Tribal Council?</p> <p>24 A It was a large auditorium, but folks were spaced out 25 because of COVID.</p>

27 (Pages 105 to 108)

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

Osta Davis

August 19, 2022

Page 109	Page 110
<p>1 Q Okay.</p> <p>2 A So it's difficult to guess how many people were in</p> <p>3 the room, but it was in a large --</p> <p>4 Q Okay.</p> <p>5 A -- auditorium.</p> <p>6 Q And that was you, I presume -- I'm sorry.</p> <p>7 Did you go in person for that meeting?</p> <p>8 A Yes.</p> <p>9 Q And did Commissioner Sims go in person for that</p> <p>10 meeting?</p> <p>11 A Yes.</p> <p>12 Q Okay. And how many times did you meet with the</p> <p>13 Tribal Council from the Yakama Indian Reservation?</p> <p>14 A I only remember meeting with them that one time.</p> <p>15 Q Okay. Did you have any other takeaways from that</p> <p>16 meeting besides that the Nation wanted to be kept whole?</p> <p>17 A Yes.</p> <p>18 Q And what were those?</p> <p>19 A I think there were conversations about land and</p> <p>20 boundaries as a cultural concept and an understanding that</p> <p>21 Yakama Nation land and cultural identity extends well</p> <p>22 beyond the Reservation and encompasses a majority of the</p> <p>23 state.</p> <p>24 Q Okay. Did you meet with any other groups when you</p> <p>25 were in the Yakima Valley?</p>	<p>1 A We had a lunch with a select number of folks from</p> <p>2 the Tribal Council and then attended the full council</p> <p>3 meeting.</p> <p>4 Q Okay. And did that lunch with the select number of</p> <p>5 members of the Tribal Council, do you have any takeaways</p> <p>6 from that lunch?</p> <p>7 A I don't remember -- I remember the lunch being more</p> <p>8 close conversations; and I was seated next to staff, so I</p> <p>9 don't remember takeaways from that meeting.</p> <p>10 Q Okay. So going back to the map -- Sorry if I missed</p> <p>11 it or misheard it -- did you say that having a Hispanic</p> <p>12 CVAP district higher than 50 percent was something you</p> <p>13 were trying to do?</p> <p>14 A I believe so, yes.</p> <p>15 Q Okay. So how did you go about doing this through</p> <p>16 Dave's? Can you walk me through the process?</p> <p>17 A Yes. In this instance I believe Matt Bridges had</p> <p>18 drawn this district --</p> <p>19 Q Okay.</p> <p>20 A -- and asked that we adopt it and release it in</p> <p>21 another round of public maps.</p> <p>22 Q And Matt Bridges worked for Commissioner Walkinshaw;</p> <p>23 is that correct?</p> <p>24 A Yes.</p> <p>25 Q Okay. Did you make any changes to this map between</p>
Page 111	Page 112
<p>1 Matt Bridges sending it to you and you sending it to</p> <p>2 Commissioner Sims?</p> <p>3 A I don't believe so. My intention was to upload it</p> <p>4 to retain the same character. The rest of our map</p> <p>5 differed from that of Commissioner Walkinshaw's, but I</p> <p>6 don't recall specifically changing this district from what</p> <p>7 Matt had sent over.</p> <p>8 Q Okay. Going back to a general sort of sense, and I</p> <p>9 should have asked this earlier, but did Commissioner Sims</p> <p>10 state her priorities to you for the redistricting process,</p> <p>11 like, "These are the things I want to see in a final map"?</p> <p>12 A Yes.</p> <p>13 Q And what were those?</p> <p>14 A From what I remember, her priorities strongly</p> <p>15 focused on equity and creating districts around which</p> <p>16 communities could organize and have more of a voice in</p> <p>17 government and elect representatives of their choice.</p> <p>18 I believe her desire was to engage in a tribal</p> <p>19 consultation process and bring the voices of indigenous</p> <p>20 folks into the process in a way that they hadn't</p> <p>21 previously.</p> <p>22 I believe that she wanted to create a map that</p> <p>23 reflected the political reality of Washington state and</p> <p>24 respected the past political trends of the state as well.</p> <p>25 And she certainly wanted to try to eliminate the</p>	<p>1 splitting of counties and cities.</p> <p>2 Q And she expressed all this to you?</p> <p>3 A Um-hmm.</p> <p>4 Q Okay.</p> <p>5 THE REPORTER: Is that a yes?</p> <p>6 A Yes. Yes.</p> <p>7 Q Can you explain what the political reality of</p> <p>8 Washington state as you understood it to mean?</p> <p>9 A I believe when Commissioner Sims was saying that she</p> <p>10 was referencing to the fact that Washington state has</p> <p>11 continually elected Democrats for president and governor</p> <p>12 and that in her mind the legislature should reflect the</p> <p>13 majority of voters' at least statewide vote for Democrats,</p> <p>14 and that that proportional representation should play a</p> <p>15 part in how the legislative districts are drawn.</p> <p>16 Q Was keeping that proportion in the legislature a</p> <p>17 priority of Commissioner Sims? Is that my understanding?</p> <p>18 A It wasn't strictly written down or assessed, but she</p> <p>19 certainly wouldn't -- didn't want to suppress or crack or</p> <p>20 pack votes based on that.</p> <p>21 Q Okay. And you mentioned that Commissioner Sims had</p> <p>22 told you that a priority is ensuring that certain</p> <p>23 communities have the opportunity to elect their</p> <p>24 candidates.</p> <p>25 Did she specifically mention the Yakima Valley</p>

28 (Pages 109 to 112)

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

Osta Davis

August 19, 2022

Page 113	Page 114
<p>1 Latino community as a priority?</p> <p>2 A I'm sure at times, yes.</p> <p>3 Q Okay. Was there a -- Did her stated priorities to</p> <p>4 you change over the course of the redistricting process?</p> <p>5 A No.</p> <p>6 Q Did you perceive her priorities to change over the</p> <p>7 course of the redistricting process?</p> <p>8 A No.</p> <p>9 Q Okay. What were your priorities going into the</p> <p>10 redistricting process?</p> <p>11 A My priorities were to serve the commissioner to the</p> <p>12 best of my ability and help accomplish the goal in a</p> <p>13 timely fashion in the best way that I could.</p> <p>14 Q And by goal, you mean the --</p> <p>15 A Meet our November 15th deadline.</p> <p>16 Q Okay. Do you feel that your priorities changed over</p> <p>17 the course of the redistricting process?</p> <p>18 A No.</p> <p>19 Q Okay.</p> <p>20 MR. THRIFT-VIVEROS: It is 12:20. Should</p> <p>21 we take a lunch break soon? Now?</p> <p>22 MS. GOLDMAN: (Nodded.)</p> <p>23 MR. THRIFT-VIVEROS: Yeah? All right.</p> <p>24 THE REPORTER: Off the record?</p> <p>25 MR. THRIFT-VIVEROS: Yes, let's go off the</p>	<p>1 record.</p> <p>2 (Discussion off the record.)</p> <p>3 (Break 12:22 p.m. to 1:24 p.m.)</p> <p>4 MR. THRIFT-VIVEROS: I'm ready to go back</p> <p>5 on the record.</p> <p>6 Q (By Mr. Thrift-Viveros) So again, Osta, if you need</p> <p>7 to take a break, let me know. That's fine. I think we</p> <p>8 went like two hours without a break before, which was fine</p> <p>9 with me, but let me know if you ever need one.</p> <p>10 So I'm going to pull up the last exhibit, Exhibit 1</p> <p>11 that we had. I'm going to pull that up again, and I'll</p> <p>12 share screen. I just have one more question about this.</p> <p>13 (Davis Exhibit No. 1 displayed.)</p> <p>14 Q So in the map -- This is the Dave's Redistricting</p> <p>15 map that was linked in this email. The Hispanic CVAP</p> <p>16 majority district is District No. 15; is that right?</p> <p>17 A Yes.</p> <p>18 Q And this is the district that included the Yakama</p> <p>19 Indian Reservation; is that right?</p> <p>20 A Yes. Yes.</p> <p>21 Q Okay. Is there a reason why you or -- Sorry.</p> <p>22 You testified that Matt Bridges was the person who</p> <p>23 drew this district; is that right?</p> <p>24 A Yes.</p> <p>25 Q Okay. Did you discuss with Matt Bridges the</p>
Page 115	Page 116
<p>1 numbering of this district and why it would be</p> <p>2 District 15?</p> <p>3 A Yes.</p> <p>4 Q Can you elaborate on that discussion?</p> <p>5 A Yeah, and I'm not sure if this map is actually the</p> <p>6 version that Commissioner Sims released in October; --</p> <p>7 Q Okay.</p> <p>8 A -- because I believe both Commissioners Walkinshaw</p> <p>9 and Sims had the district numbered the same number, so</p> <p>10 perhaps it would have been 14 in the released ones.</p> <p>11 Q Okay.</p> <p>12 A But there was conversation about the cycles when the</p> <p>13 state senate seats would be up, and I believe in even</p> <p>14 numbered districts the seats are up on presidential</p> <p>15 election cycles.</p> <p>16 Q Okay. And then for odd numbered districts what</p> <p>17 year -- what years would those be up for election?</p> <p>18 MS. GOLDMAN: Objection, vague.</p> <p>19 A So I was working primarily for the House Democratic</p> <p>20 Caucus, and so those seats are up every two years.</p> <p>21 Q (By Mr. Thrift-Viveros) Right. Okay.</p> <p>22 A The Senate seats are up every four years, with half</p> <p>23 of the seats up each election cycle.</p> <p>24 Q Okay. So just to clarify, the even numbered</p> <p>25 districts are during presidential years, and then the odd</p>	<p>1 numbered districts are during the like midterm years?</p> <p>2 MS. GOLDMAN: Objection, misstates the</p> <p>3 testimony.</p> <p>4 A I would need to know a list or look at past election</p> <p>5 results to say for sure which districts are up when, --</p> <p>6 Q (By Mr. Thrift-Viveros) Okay.</p> <p>7 A -- but I know that half are up each two years.</p> <p>8 Q Okay. And although as you mentioned you worked for</p> <p>9 the House Caucus, did the numbering of the districts</p> <p>10 influence your mapmaking personally?</p> <p>11 A Yes.</p> <p>12 Q Um-hmm. In what ways?</p> <p>13 A In that it was a priority for the Senate and</p> <p>14 therefore a consideration of ours as well.</p> <p>15 Q Okay. And did Commissioner Sims, did you have</p> <p>16 conversations with her about the numbering of the</p> <p>17 districts?</p> <p>18 A Yes.</p> <p>19 Q And do you recall those conversations?</p> <p>20 A I recall her liking the idea of having the seat, the</p> <p>21 Senate seat up during a presidential year, but also her --</p> <p>22 uncertain in terms of how Commissioner Graves or Fain</p> <p>23 would feel about those decisions.</p> <p>24 Q Okay. And when you say the Senate seat, what are</p> <p>25 you referring to?</p>

29 (Pages 113 to 116)

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

Osta Davis

August 19, 2022

Page 117	Page 118
<p>1 A The State Senate seat that's up on that four-year</p> <p>2 cycle, whereas our seats and the congressional seats are</p> <p>3 up every two years, --</p> <p>4 Q Right.</p> <p>5 A -- so it really wouldn't make too much of a</p> <p>6 difference.</p> <p>7 Q And when you say the Senate seat, do you mean for</p> <p>8 districts -- for the Hispanic CVAP majority districts?</p> <p>9 A Yes.</p> <p>10 Q Okay. So just so I'm clear, Commissioner Sims</p> <p>11 expressed that she wanted the Hispanic CVAP majority</p> <p>12 district to have their Senate elections during</p> <p>13 presidential election years?</p> <p>14 MS. GOLDMAN: Objection, misstates the</p> <p>15 testimony.</p> <p>16 A My understanding is that Commissioner Sims was aware</p> <p>17 of Commissioner Walkinshaw's priorities around that, the</p> <p>18 numbering of the districts, and shared his priorities.</p> <p>19 Q (By Mr. Thrift-Viveros) Okay. Yeah, let's get a</p> <p>20 little bit into Commissioner Walkinshaw's priorities.</p> <p>21 Did he express his priorities to you?</p> <p>22 A I don't recall if he explicitly expressed his</p> <p>23 priorities to me directly.</p> <p>24 Q Okay. But did he express them to Commissioner Sims,</p> <p>25 and then she told you?</p>	<p>1 A Yes.</p> <p>2 Q Okay. And do you recall what those priorities as</p> <p>3 conveyed by Commissioner Sims to you were?</p> <p>4 A I recall that Commissioner Walkinshaw expressed a</p> <p>5 great deal of interest in the Yakima Valley region and</p> <p>6 felt that as a Latino commissioner himself that he wanted</p> <p>7 to take lead on that district.</p> <p>8 Q Okay. Do you recall when Commissioner Sims told you</p> <p>9 about Commissioner Walkinshaw's interest in taking lead on</p> <p>10 that district?</p> <p>11 A No.</p> <p>12 Q Do you have an estimate of when she conveyed that to</p> <p>13 you? Was it before the September maps, for example?</p> <p>14 A I primarily recall those conversations after I came</p> <p>15 back from leave, --</p> <p>16 Q Okay.</p> <p>17 A -- so that would be October.</p> <p>18 Q Okay. And was part of those priorities an interest</p> <p>19 in the numbering of the Latino or the Hispanic CVAP</p> <p>20 majority district?</p> <p>21 A I believe so.</p> <p>22 Q Okay. And did Commissioner Sims express an opinion</p> <p>23 to you on Commissioner Walkinshaw's interest in taking</p> <p>24 lead on the formation of that district?</p> <p>25 A I don't recall a strong opinion.</p>
Page 119	Page 120
<p>1 Q Okay.</p> <p>2 A Yeah.</p> <p>3 Q Did she say like she was okay with it?</p> <p>4 A Yes. I would say that Commissioner Sims appreciated</p> <p>5 the work that Commissioner Walkinshaw was putting in.</p> <p>6 Q How did she express that appreciation?</p> <p>7 A I believe to my recollection she may have thanked</p> <p>8 him for holding the meeting where Dr. Barreto presented</p> <p>9 his slides.</p> <p>10 Q Okay. Do you know if the dyad of</p> <p>11 Commissioner Sims and Commissioner Graves discussed the</p> <p>12 Matt Barreto, the Dr. Barreto presentation?</p> <p>13 MS. GOLDMAN: Objection, calls for</p> <p>14 speculation.</p> <p>15 A I believe so.</p> <p>16 Q (By Mr. Thrift-Viveros) And what do you base that</p> <p>17 belief on?</p> <p>18 A I believe that I remember a meeting where that was</p> <p>19 discussed.</p> <p>20 Q Okay. That you were present at?</p> <p>21 A Yes.</p> <p>22 Q Okay. Do you remember anything about the</p> <p>23 discussion?</p> <p>24 A Yes.</p> <p>25 Q Do you remember -- Can you elaborate?</p>	<p>1 A My take from that meeting was that</p> <p>2 Commissioner Graves didn't put that much weight into</p> <p>3 Dr. Barreto's analysis.</p> <p>4 Q Did he say why?</p> <p>5 A I believe he might have said something along the</p> <p>6 lines that he could hire someone to come up with a</p> <p>7 different analysis.</p> <p>8 Q And did he hire someone to come up with an analysis?</p> <p>9 MS. GOLDMAN: Objection, calls for</p> <p>10 speculation.</p> <p>11 A I know that there was a memo released.</p> <p>12 Q (By Mr. Thrift-Viveros) Um-hmm. Okay.</p> <p>13 A I don't know if that was the same nature of the type</p> <p>14 of analysis that Dr. Barreto produced.</p> <p>15 Q Okay. The same question about -- Well, yeah, sorry.</p> <p>16 Did Commissioner Sims and Commissioner Graves as far</p> <p>17 as you know discuss the applicability of the Voting Rights</p> <p>18 Act to these maps?</p> <p>19 A Yes.</p> <p>20 Q Were you present at those discussions, or at least</p> <p>21 one of the discussions?</p> <p>22 A Yes.</p> <p>23 Q Do you recall what they discussed?</p> <p>24 A Yes.</p> <p>25 Q Can you tell me what they discussed?</p>

30 (Pages 117 to 120)

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

Osta Davis

August 19, 2022

Page 121	Page 122
<p>1 A In my recollection Commissioner Sims said that we 2 needed -- the commission needed to come up with final maps 3 that were certainly different than the initial September 4 maps that everyone proposed, and that there needed to be a 5 district where Hispanic voting age population had the 6 ability to elect their candidates of choice. 7 Q And how did you determine whether a district was 8 drawn in a way that would allow Hispanic -- the Hispanics 9 of that district to elect the candidates of their choice? 10 A I didn't determine that. 11 Q Who did? 12 MS. GOLDMAN: Objection, calls for 13 speculation. 14 A I'm not aware of folks doing that. 15 Q (By Mr. Thrift-Viveros) Okay. Did Commissioner 16 Graves beyond his opinion of the Dr. Barreto analysis, did 17 he express an opinion in conversations that you were 18 present on the Voting Rights Act? 19 A Yes. 20 Q Do you recall what he said? 21 A I -- My recollection was that Commissioner Graves 22 had pushed back on the idea that a Voting Rights Act 23 compliant district wouldn't necessarily require the 24 district to be a strongly Democratic district, and I 25 recall him saying that, that sentiment.</p>	<p>1 Q In your opinion based on these conversations did 2 Commissioner Graves conflate Latinos with Democrats? 3 A No. 4 Q Okay. Did he say anything else about the Voting 5 Rights Act? 6 A Not that I recall. 7 Q Okay. Did he say anything about how the Voting 8 Rights Act would apply to Washington state in general? 9 A No. 10 Q Okay. And when Commissioner Sims said that she 11 believes that there should have been -- there should be a 12 district that allows Hispanics to elect their candidate of 13 choice, how did Graves respond to that? 14 A My perception was that Commissioner Graves was 15 receptive to hearing what Commissioner Sims had to say but 16 disagreed in terms of what that -- the drawing of that 17 district would look like. 18 Q Do you recall like what he said or how he disagreed? 19 A I think he primarily disagreed with the drawings of 20 that district that made it what he considered to be more 21 of a safe Democratic seat. 22 Q Okay. Did he express an opinion that Latinos 23 electing Democrats is them electing the candidates of 24 their choice? 25 A I don't remember him saying that.</p>
Page 123	Page 124
<p>1 Q Okay. Did he say why he thought that a district 2 that elected Democratic candidates didn't need to comply 3 with the Voting Rights Act? 4 MS. GOLDMAN: Objection, misstates the 5 testimony. 6 A My understanding is that every district needs to 7 comply with the Voting Rights Act. Only in some districts 8 are the pre-conditions of racially polarized voting 9 present, and so my understanding is every district in 10 Washington should be in compliance. 11 Q (By Mr. Thrift-Viveros) And did Commissioner Graves 12 express an opinion either way on that statement you just 13 made? 14 A It was never my perception that Commissioner Graves 15 did not want to follow the law. 16 Q Okay. And when you say that the Hispanics of a 17 district want to elect the candidates of their choice, how 18 would you make an assessment to determine that Hispanics 19 of a certain district can elect the candidates of their 20 choice? 21 MS. GOLDMAN: Objection, vague. 22 A I didn't run a formal analysis, but we certainly 23 referenced Dr. Barreto's presentation. 24 Q (By Mr. Thrift-Viveros) Do you know if anyone else 25 that worked for Commissioner Sims, if they ran an analysis</p>	<p>1 on the ability of the Hispanics of a certain district to 2 elect the candidates of their choice? 3 A I do not believe they did. 4 Q Okay. Do you know if any one of Commissioner 5 Walkinshaw's staff conducted analyses of whether Hispanics 6 of a certain district could elect the candidates of their 7 choice? 8 A Yes. 9 Q Do you know who? 10 A My understanding is that they shared draft districts 11 with Dr. Barreto's team. 12 Q Okay. Do you know how many maps they shared with 13 Dr. Barreto's team? 14 A No. 15 MR. THRIFT-VIVEROS: I have an email here. 16 We'll mark it as Exhibit 2. 17 (Davis Exhibit No. 2 introduced.) 18 MS. GOLDMAN: Thank you. 19 MR. THRIFT-VIVEROS: And let me drop it in 20 the chat. 21 (Discussion with Mr. Herrera.) 22 Q (By Mr. Thrift-Viveros) Is that your name in the 23 recipient line -- 24 A Yes. 25 Q -- from the top email?</p>

31 (Pages 121 to 124)

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

Osta Davis

August 19, 2022

Page 125	Page 126
<p>1 Okay. Do you recall receiving this email?</p> <p>2 A Yes.</p> <p>3 MR. THRIFT-VIVEROS: And oh, yeah, let me</p> <p>4 put it in the chat box.</p> <p>5 Q Were you present at the meeting that Matt Bridges</p> <p>6 says that he was apologizing for losing his cool?</p> <p>7 A Yes.</p> <p>8 Q Can you tell me what was that meeting about?</p> <p>9 A I believe it was about the Voting Rights Act and</p> <p>10 Yakima Valley.</p> <p>11 Q Do you remember anything else?</p> <p>12 A Yes.</p> <p>13 Q What else happened?</p> <p>14 A I remember at that point in the meeting Matt Bridges</p> <p>15 accused Commissioner Sims of not standing up for</p> <p>16 communities of color and expressed very strong accusations</p> <p>17 around that.</p> <p>18 Q Do you know why he said that?</p> <p>19 MS. GOLDMAN: Objection, calls for</p> <p>20 speculation.</p> <p>21 A I do not.</p> <p>22 Q (By Mr. Thrift-Viveros) What exactly were his</p> <p>23 accusations to Commissioner Sims?</p> <p>24 A I think -- I mean, what I just said previously,</p> <p>25 that -- that she could potentially be letting down</p>	<p>1 communities of color, and lecturing her about her job.</p> <p>2 Q Who else was present at that meeting?</p> <p>3 A Dominique Meyers, Ali O'Neil, and Matt Bridges. And</p> <p>4 I don't recall if there was anyone else.</p> <p>5 Q Okay. And was Matt Bridges' accusations, did they</p> <p>6 arise out of a specific map that was proposed?</p> <p>7 MS. GOLDMAN: Objection, calls for</p> <p>8 speculation, asked and answered.</p> <p>9 A And going back, I believe Adam with the last name I</p> <p>10 don't remember was also at that meeting.</p> <p>11 Q (By Mr. Thrift-Viveros) Okay.</p> <p>12 A No, I do not believe that it was in reference to a</p> <p>13 specific map.</p> <p>14 Q Were these accusations specifically about the Yakima</p> <p>15 Valley region?</p> <p>16 A Yes.</p> <p>17 Q Were the accusations that Commissioner Sims wasn't</p> <p>18 prioritizing creating a district that would elect Hispanic</p> <p>19 candidates of choice?</p> <p>20 A Not necessarily. I recall Commissioner Sims</p> <p>21 expressing concern that through negotiations we might get</p> <p>22 a watered down version of an attempted Voting Rights Act</p> <p>23 compliant district and that she would be disappointed by</p> <p>24 that outcome, and I recall Matt Bridges becoming very</p> <p>25 agitated.</p>
Page 127	Page 128
<p>1 Q Um-hmm. And how did Commissioner Sims respond to</p> <p>2 Matt Bridges' outburst?</p> <p>3 A I recall her responding that it created a very</p> <p>4 uncomfortable situation to have an all white staff</p> <p>5 lecturing her about standing up for communities of color.</p> <p>6 Q Anything else?</p> <p>7 A That's the main -- That's mostly what I remember.</p> <p>8 Q Okay. Do you know -- Just within the context of</p> <p>9 this conversation, do you know what race Commissioner Sims</p> <p>10 identifies as?</p> <p>11 A My understanding is that she identifies as Black.</p> <p>12 Q Okay. And you mentioned that Commissioner Sims was</p> <p>13 discussing that the -- as you said, the VRA compliant</p> <p>14 district was watered down.</p> <p>15 What is your understanding of what the watered down</p> <p>16 version means?</p> <p>17 MS. GOLDMAN: Objection, misstates the</p> <p>18 testimony.</p> <p>19 A At the time of that discussion I do not believe that</p> <p>20 there was a specific district that we were looking at.</p> <p>21 Commissioner Sims raised the concern that through</p> <p>22 negotiation that this district might look quite a bit</p> <p>23 different from the October maps that the commissioners</p> <p>24 revealed -- posted; and her concerns were more from a</p> <p>25 negotiation perspective, that that was something that she</p>	<p>1 could foresee happening during negotiations, and</p> <p>2 Matt Bridges lambasted her for those observations.</p> <p>3 Q Did she express to you why she felt that this was</p> <p>4 something that could happen during negotiations?</p> <p>5 MS. GOLDMAN: Objection, vague.</p> <p>6 A I think so.</p> <p>7 Q (By Mr. Thrift-Viveros) Do you recall what she said?</p> <p>8 A My recollection was that she was referencing</p> <p>9 Commissioner Graves' strong assertion that a Voting Rights</p> <p>10 Act compliant district didn't necessary mean a strong</p> <p>11 Democratic district, and that he would not or did not seem</p> <p>12 to have an interest in voting on a map that would create a</p> <p>13 strong Democratic district.</p> <p>14 Q Did Commissioner Sims express to you whether she</p> <p>15 considered it acceptable to end up with a watered --</p> <p>16 quote, "watered down" VRA compliant district if she</p> <p>17 achieved other goals, like in her negotiations?</p> <p>18 MS. GOLDMAN: Objection, vague.</p> <p>19 A Commissioner Sims expressed that she would -- that</p> <p>20 she would consult with Commissioner Walkinshaw and defer</p> <p>21 to his judgment on the final maps as they related to</p> <p>22 Yakima Valley.</p> <p>23 Q (By Mr. Thrift-Viveros) In your opinion did</p> <p>24 Commissioner Sims defer to Commissioner Walkinshaw's</p> <p>25 judgment regarding Yakima Valley?</p>

32 (Pages 125 to 128)

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

Osta Davis

August 19, 2022

Page 129	Page 130
<p>1 A My recollection is that she consulted with</p> <p>2 Commissioner Walkinshaw, and he agreed with the maps and</p> <p>3 gave his approval.</p> <p>4 Q With which maps?</p> <p>5 A The final maps.</p> <p>6 Q Okay. From what you recall was the term watered</p> <p>7 down VRA district, was that -- were those the words that</p> <p>8 Commissioner Sims used in that meeting?</p> <p>9 A I don't remember her specific wording.</p> <p>10 Q Okay. But that was the idea that you came away</p> <p>11 with?</p> <p>12 MS. GOLDMAN: Objection, vague.</p> <p>13 A Yes.</p> <p>14 Q (By Mr. Thrift-Viveros) Okay. What did you</p> <p>15 understand that to mean, a watered down VRA district?</p> <p>16 A My sense is that -- and my memory vaguely is that</p> <p>17 Commissioner Sims thought that perhaps it might be more</p> <p>18 difficult to bring a Voting Rights Act violation case</p> <p>19 against the commission if they had a majority CVAP</p> <p>20 Hispanic district, even if that district didn't</p> <p>21 necessarily allow for the ability for that community to</p> <p>22 elect their candidates of choice.</p> <p>23 Q Commissioner Sims expressed that?</p> <p>24 A Yes.</p> <p>25 Q So as Commissioner Sims expressed to you, for a</p>	<p>1 district to be VRA compliant you just needed a CVAP</p> <p>2 majority -- Latino CVAP majority?</p> <p>3 A No.</p> <p>4 Q No? Oh, okay. Sorry if I misunderstood.</p> <p>5 What did Commissioner Sims express to you as to what</p> <p>6 was required for a VRA compliant district?</p> <p>7 A Commissioner Sims expressed that it presented quite</p> <p>8 a bit of difficulty to negotiate something that has legal</p> <p>9 requirements rather than just a back-and-forth of</p> <p>10 commissioner desires or priorities.</p> <p>11 Q Um-hmm.</p> <p>12 A What was the rest of that question?</p> <p>13 THE REPORTER: I can read it back.</p> <p>14 MR. THRIFT-VIVEROS: Can you read it back?</p> <p>15 Thank you.</p> <p>16 (Question read back.)</p> <p>17 A Yes. Commissioner Sims and I both attended the</p> <p>18 presentation from Dr. Barreto; and so to my understanding</p> <p>19 we were both absorbing the information that he presented,</p> <p>20 and that was my assumption in terms of her understanding</p> <p>21 of the requirements as well.</p> <p>22 Q Do you know if Matt Bridges had a different</p> <p>23 understanding of what was required for a VRA compliant</p> <p>24 district?</p> <p>25 MS. GOLDMAN: Objection, calls for</p>
Page 131	Page 132
<p>1 speculation.</p> <p>2 A No.</p> <p>3 Q (By Mr. Thrift-Viveros) Did he express to you or</p> <p>4 Commissioner Sims or anyone present at that meeting what</p> <p>5 he believed would be required for a VRA compliant</p> <p>6 district?</p> <p>7 A My sense is that Matt Bridges expressed a strong</p> <p>8 desire for what we would describe as a safe Democratic</p> <p>9 district.</p> <p>10 Q And how did he express that?</p> <p>11 A Through conversations.</p> <p>12 Q In that meeting or other meetings?</p> <p>13 A At that meeting primarily.</p> <p>14 Q Okay. And did he tell you what he meant by a safe</p> <p>15 Democratic district?</p> <p>16 A Not that I recall.</p> <p>17 Q What is your understanding of what a safe Democratic</p> <p>18 district means?</p> <p>19 A In our negotiations with Commissioner Graves we</p> <p>20 created categories in terms of safe and lean districts,</p> <p>21 and so internally we had described a safe district as a</p> <p>22 district where the State Treasurer's performance exceeded</p> <p>23 55 percent.</p> <p>24 Q Okay. And what was categorized as a lean district?</p> <p>25 A Districts between -- A lean Democratic district</p>	<p>1 would be between 50 and 54.9 percent, I believe, or 53. I</p> <p>2 believe we may have had subcategories.</p> <p>3 Q Like was there like a tossup category that could go</p> <p>4 either way?</p> <p>5 A I don't recall.</p> <p>6 Q Do you recall where the district, the Latino</p> <p>7 majority CVAP -- sorry. The -- Excuse me.</p> <p>8 Do you recall where the majority Latino CVAP</p> <p>9 district in the October maps, what category that district</p> <p>10 fell in?</p> <p>11 MS. GOLDMAN: Counsel, can you specify</p> <p>12 which maps you're talking about?</p> <p>13 Q (By Mr. Thrift-Viveros) The October maps that were</p> <p>14 released by -- publicly posted by Commissioner Sims and</p> <p>15 Commissioner Walkinshaw that were the same district;</p> <p>16 right?</p> <p>17 A Yes. I do not recall exactly what the performance</p> <p>18 was of those districts.</p> <p>19 Q Okay. So how did you, or do you -- Sorry.</p> <p>20 Did you balance -- I'm sorry. Let me take that</p> <p>21 back.</p> <p>22 How would you analyze the interplay between</p> <p>23 electoral performance and -- Sorry. Let me strike that.</p> <p>24 How would you balance when creating a district the</p> <p>25 electoral performance and the ethnic makeup if you wanted</p>

33 (Pages 129 to 132)

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

Osta Davis

August 19, 2022

Page 133	Page 134
<p>1 to achieve a VRA compliant district?</p> <p>2 MS. FRANKLIN: Objection, calls for a legal</p> <p>3 conclusion.</p> <p>4 MS. GOLDMAN: Yes, same objection, and</p> <p>5 vague.</p> <p>6 A Commissioners Sims and Graves would have</p> <p>7 negotiations and discussions back and forth regarding I'd</p> <p>8 say primarily to my understanding political performance.</p> <p>9 Yeah.</p> <p>10 Q (By Mr. Thrift-Viveros) Okay. And do you know if</p> <p>11 one of their priorities was to maintain a similar balance</p> <p>12 of safe Republican seats, safe Democratic seats, leaning</p> <p>13 Republican seats, leaning Democratic seats, as the current</p> <p>14 map is composed?</p> <p>15 MS. GOLDMAN: Objection, compound, and it</p> <p>16 calls for speculation. Lack of foundation.</p> <p>17 A No.</p> <p>18 Q (By Mr. Thrift-Viveros) Did you examine data related</p> <p>19 to elections that involved a Latino candidate in the</p> <p>20 Latino majority, the Latino CVAP majority district?</p> <p>21 MS. GOLDMAN: Objection, vague.</p> <p>22 A I looked at the analysis provided by Dr. Barreto.</p> <p>23 Q (By Mr. Thrift-Viveros) Okay. Do you know if any</p> <p>24 other commission staff conducted an analysis of Latino</p> <p>25 candidates running in the Hispanic majority CVAP district?</p>	<p>1 A Not to my knowledge.</p> <p>2 Q Okay. Do you know if any of the commissioners</p> <p>3 contracted with someone outside of their staff to conduct</p> <p>4 an analysis of Latino candidates running in a Latino CVAP</p> <p>5 majority district?</p> <p>6 A Yes.</p> <p>7 Q You do know?</p> <p>8 A Yes.</p> <p>9 Q And who's that?</p> <p>10 A Commissioner Walkinshaw contracted with Dr. Barreto</p> <p>11 to run that analysis.</p> <p>12 Q Okay. Anyone else?</p> <p>13 A Not that I'm aware of.</p> <p>14 Q Okay. Did Commissioner Walkinshaw as far as you</p> <p>15 know consult with Commissioner Sims on the contracting</p> <p>16 with Dr. Barreto?</p> <p>17 A Not that I'm aware of.</p> <p>18 Q Okay. As far as you know was Commissioner Sims</p> <p>19 surprised that Commissioner Walkinshaw contracted with</p> <p>20 Dr. Barreto?</p> <p>21 A I am not aware.</p> <p>22 Q Okay. And going back to this meeting with</p> <p>23 Matt Bridges, what was -- from yeah, this email from</p> <p>24 October 22nd, was there any fallout from this meeting, any</p> <p>25 lasting consequences?</p>
Page 135	Page 136
<p>1 MS. FRANKLIN: Objection, vague.</p> <p>2 A Yes.</p> <p>3 Q (By Mr. Thrift-Viveros) And what were those?</p> <p>4 A I believe or my perception was that there was a</p> <p>5 lasting lack of camaraderie between Commissioner Sims and</p> <p>6 Commissioner Walkinshaw's team, and certainly a perceived</p> <p>7 on our end lack of respect from Commissioner Walkinshaw's</p> <p>8 staff.</p> <p>9 Q Do you know if this affected the relationship</p> <p>10 between Commissioner Sims and Commissioner Walkinshaw?</p> <p>11 A I do not believe that it did.</p> <p>12 Q Okay. But between the staffs?</p> <p>13 A I would say between the staffs, as well as between</p> <p>14 Commissioner Sims and Commissioner Walkinshaw's staff.</p> <p>15 Q Did you continue working with Matt Bridges after</p> <p>16 this meeting?</p> <p>17 A Yes.</p> <p>18 Q In what capacity?</p> <p>19 A I believe there may have been other calls or</p> <p>20 meetings that we both attended, and there may have been</p> <p>21 email exchanges.</p> <p>22 Q What was your personal impression from that meeting?</p> <p>23 Did it affect the way that you worked with Commissioner</p> <p>24 Walkinshaw's staff?</p> <p>25 A Yes.</p>	<p>1 Q In what way?</p> <p>2 A It made me perceive Commissioner Walkinshaw's staff</p> <p>3 as viewing their role as much more active in terms of</p> <p>4 pursuing their own personal agendas rather than deferring</p> <p>5 to their commissioner.</p> <p>6 Q Okay. And when you're talking about personal</p> <p>7 agendas, are you only referring to Matt Bridges, or are</p> <p>8 you referring to other staff members of Commissioner</p> <p>9 Walkinshaw?</p> <p>10 A I would refer to other staff members as well.</p> <p>11 Q Do you know what the -- When you say personal agenda</p> <p>12 of -- Sorry, strike that.</p> <p>13 Which other staff members?</p> <p>14 A Ali O'Neil, and perhaps others on their team, but I</p> <p>15 primarily interacted with Ali O'Neil.</p> <p>16 Q What would you describe as their personal agenda</p> <p>17 that you were mentioning, for Ali O'Neil, let's say?</p> <p>18 A I -- My understanding was that they had a particular</p> <p>19 vision of the maps that they wanted the commission to</p> <p>20 produce, and that determination on whether they wanted</p> <p>21 maps to pass was not based off Commissioner Walkinshaw's</p> <p>22 direction.</p> <p>23 Q Can you clarify that? What were they looking for</p> <p>24 that you believed to not be under Commissioner</p> <p>25 Walkinshaw's direction?</p>

34 (Pages 133 to 136)

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

Osta Davis

August 19, 2022

Page 137	Page 138
<p>1 A I believe there are certain districts or certain --</p> <p>2 certain areas that Commissioner Walkinshaw had expressly</p> <p>3 expressed his approval, and his staff vehemently disagreed</p> <p>4 with and didn't defer to his direction.</p> <p>5 Q Do you recall what districts those were?</p> <p>6 A I recall that occurring with the 47th legislative</p> <p>7 district.</p> <p>8 Q And where is that located?</p> <p>9 A That includes Kent, south King County area.</p> <p>10 Q Okay. Do you know if there was a dispute between</p> <p>11 Commissioner Walkinshaw and his staff on the districts in</p> <p>12 the Yakima Valley region?</p> <p>13 A I am not sure of those conversations.</p> <p>14 Q Okay. What other districts do you recall that there</p> <p>15 was disagreement besides the 47th?</p> <p>16 A The 47th comes to mind first and foremost. I</p> <p>17 couldn't say what the other districts were.</p> <p>18 Q Okay. Do you recall what the staff of</p> <p>19 Commissioner Walkinshaw did in the 47th district that he</p> <p>20 did not approve of?</p> <p>21 A I guess I wouldn't necessarily characterize them as</p> <p>22 doing things he didn't approve of. I'd rather</p> <p>23 characterize it as Commissioner Walkinshaw agreeing to</p> <p>24 maps that his staff hadn't drafted, either our staff or</p> <p>25 Commissioner Graves staff had drafted, and then</p>	<p>1 Commissioner Walkinshaw's team expressing strong</p> <p>2 disagreement with his decision to agree to those maps.</p> <p>3 Q Do you know what the disagreement was over the 47th</p> <p>4 district?</p> <p>5 A My understanding was that they wanted a larger</p> <p>6 increase in Democratic political performance.</p> <p>7 Q The staff specifically?</p> <p>8 A Yes.</p> <p>9 Q Okay. Did Commissioner Sims have a list of priority</p> <p>10 areas on the map or priority legislative districts?</p> <p>11 MS. FRANKLIN: Objection, compound.</p> <p>12 A Yes.</p> <p>13 Q (By Mr. Thrift-Viveros) And do you recall what those</p> <p>14 areas were?</p> <p>15 A Yes.</p> <p>16 Q What were they?</p> <p>17 A Commissioners Sims and Graves agreed to a number of</p> <p>18 districts that were in play that would fall into that</p> <p>19 bucket, as well as some non-district specific priorities.</p> <p>20 Q And what were those priorities, the non-district</p> <p>21 specific?</p> <p>22 A I recall Commissioner Sims expressing an interest in</p> <p>23 having more majority minority districts in King County and</p> <p>24 an increase from the current 2011 commission created maps,</p> <p>25 as well as a desire for fewer city splits than there were</p>
Page 139	Page 140
<p>1 in the previous maps.</p> <p>2 Q Okay. Any specific cities that you remember that</p> <p>3 were split that she wanted to not split?</p> <p>4 A Yes. I believe the City of Renton was particularly</p> <p>5 vocal about their desire to not be split.</p> <p>6 Q Okay. Any other cities that you recall?</p> <p>7 A No.</p> <p>8 Q Was the City of Yakima discussed on keeping --</p> <p>9 discussed whether it would be split or not between</p> <p>10 districts?</p> <p>11 A I don't recall that conversation.</p> <p>12 Q Okay. And you mentioned that -- and forgive me if I</p> <p>13 misheard or am misstating, but that Commissioners Sims and</p> <p>14 Graves had a list of priority districts that they wanted</p> <p>15 to work on; is that right?</p> <p>16 A That's correct.</p> <p>17 Q Okay. Do you recall which districts those were?</p> <p>18 A Yes.</p> <p>19 Q And what were they?</p> <p>20 A And I may have forgotten some, but off the top of my</p> <p>21 head I would say legislative districts 42, 10, 44, five,</p> <p>22 47, 30, 28, 35, 17, and the district that at the time we</p> <p>23 weren't sure -- we were calling 14/15 -- but a Yakima</p> <p>24 Valley district.</p> <p>25 Q Okay. You have a good memory for remembering all of</p>	<p>1 those.</p> <p>2 A And I don't know if I said 10, but also legislative</p> <p>3 district 10 as well.</p> <p>4 Q So we can, yeah, focus on the Yakima Valley region.</p> <p>5 So you -- or forgive me again if I am misstating, but you</p> <p>6 were saying that that area was a priority for both</p> <p>7 Commissioner Sims and Commissioner Graves?</p> <p>8 A Yes.</p> <p>9 Q Did they share similar goals, or how did they both</p> <p>10 have -- Sorry.</p> <p>11 What do you mean by it was a priority, that</p> <p>12 district, for both of them?</p> <p>13 A I believe that they both understood that there would</p> <p>14 be a lot of focus and public interest in that area. I</p> <p>15 think they both understood that the population in western</p> <p>16 Washington had grown significantly, and how eastern</p> <p>17 Washington was drawn would create downstream effects in</p> <p>18 the rest of the state.</p> <p>19 And those were the primary considerations, I'd say.</p> <p>20 Q Do you know what the -- Or what are you basing the</p> <p>21 statement that they believe that there would be a lot of</p> <p>22 public interest in that region, what are you basing that</p> <p>23 on?</p> <p>24 A I was basing that on different public comment as</p> <p>25 well as sentiments expressed from the Redistricting</p>

35 (Pages 137 to 140)

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

Osta Davis

August 19, 2022

Page 141	Page 142
<p>1 Justice Coalition.</p> <p>2 Q And the certain public comment, do you remember what</p> <p>3 that comment was?</p> <p>4 A No.</p> <p>5 Q Okay. You also mentioned that it was one of Sims'</p> <p>6 priorities to create the -- and sorry if I'm</p> <p>7 misremembering, but creating majority minority districts.</p> <p>8 I don't know the exact words that you used.</p> <p>9 MR. THRIFT-VIVEROS: Can you read back a</p> <p>10 little bit of the ways?</p> <p>11 THE REPORTER: Sure.</p> <p>12 "A I recall Commissioner Sims expressing an interest in</p> <p>13 having more majority minority districts in King County and</p> <p>14 an increase from the current 2011 commission created maps,</p> <p>15 as well as a desire for fewer city splits than there were</p> <p>16 in the previous maps."</p> <p>17 MR. THRIFT-VIVEROS: Great. Thank you.</p> <p>18 Q Was she specific -- Was Commissioner Sims specific</p> <p>19 on where these majority -- or sorry. Let me take that</p> <p>20 back.</p> <p>21 What does majority minority district mean to you?</p> <p>22 A My understanding in the conversations about those</p> <p>23 districts, they were more in relation to the total</p> <p>24 population being majority non-white.</p> <p>25 Q The total population of that district?</p>	<p>1 A Yes.</p> <p>2 Q Okay. Was it total population or total citizen</p> <p>3 voting age population?</p> <p>4 A My recollection was that conversations regarding</p> <p>5 that were more based on total population.</p> <p>6 Q Okay. And just to clarify, total population and not</p> <p>7 voting age population; right?</p> <p>8 A Correct.</p> <p>9 Q Okay. Did Commissioner Sims have a number of</p> <p>10 majority minority districts that she wanted to create?</p> <p>11 A Maybe.</p> <p>12 Q Did she express that to you, that number?</p> <p>13 A Maybe, but I don't recall.</p> <p>14 Q Okay. And did she -- Let me take a moment.</p> <p>15 Did you do any analysis of Latino communities of</p> <p>16 interest? Or sorry. Let me take that back.</p> <p>17 Did you do any analysis on the maps of communities</p> <p>18 of interest?</p> <p>19 A We certainly considered communities of interest and</p> <p>20 considered that when drafting our maps.</p> <p>21 Q Okay. In what way? How? What do you mean by you</p> <p>22 considered it?</p> <p>23 A Oftentimes the public comment was -- some of the</p> <p>24 public comment included folks testifying and describing</p> <p>25 localized communities of interest, and Commissioner Sims</p>
Page 143	Page 144
<p>1 aimed to be responsive to that public testimony.</p> <p>2 Q Do you recall any public comments from residents of</p> <p>3 the Yakima Valley regarding communities of interest there?</p> <p>4 A No.</p> <p>5 Q Okay. Did you do any other examination of</p> <p>6 communities of interest like in the Yakima Valley?</p> <p>7 A We looked at Tribal Reservations and communities.</p> <p>8 Q Okay. Did any other commissioners -- Going back to</p> <p>9 you mentioning that Commissioner Sims expressed an</p> <p>10 interest in creating majority minority districts, did any</p> <p>11 of the other commissioners or commissioners' staff express</p> <p>12 to you that they had a goal of a certain amount of</p> <p>13 majority minority districts?</p> <p>14 A I don't remember.</p> <p>15 Q Did you ever conduct an analysis of Latino voter</p> <p>16 turnout rates when you created these maps?</p> <p>17 A No.</p> <p>18 Q Okay. Did you conduct an analysis of any turnout</p> <p>19 rates for voters in the process of creating these maps?</p> <p>20 A No.</p> <p>21 Q And did you conduct a racially polarized voting</p> <p>22 analysis for any district in any of the maps?</p> <p>23 A No.</p> <p>24 Q Do you know if any other commissioner or commission</p> <p>25 staff conducted a racially polarized voting analysis on</p>	<p>1 any district in any map?</p> <p>2 MS. GOLDMAN: In what map?</p> <p>3 Q (By Mr. Thrift-Viveros) Any district in any map.</p> <p>4 A Yes.</p> <p>5 MS. FRANKLIN: Objection, lack of</p> <p>6 foundation.</p> <p>7 Q (By Mr. Thrift-Viveros) Do you know who that was?</p> <p>8 A My -- I remember Commissioner Walkinshaw hiring</p> <p>9 Dr. Barreto.</p> <p>10 Q Okay. Do you recall anyone else?</p> <p>11 A Not that I remember.</p> <p>12 Q Okay. Do you know what Commissioner Sims considered</p> <p>13 a majority minority district?</p> <p>14 A I believe that in those considerations she was</p> <p>15 looking at total population.</p> <p>16 Q Okay. And that's not voting age population or</p> <p>17 citizen voting age population?</p> <p>18 A No.</p> <p>19 Q Did any other commissioner express to you what they</p> <p>20 understood a majority minority district to mean?</p> <p>21 A Not that I recall.</p> <p>22 Q Do you recall any conversations with commission</p> <p>23 staff on what they considered a majority minority district</p> <p>24 to mean?</p> <p>25 A No.</p>

36 (Pages 141 to 144)

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

Osta Davis

August 19, 2022

Page 145	Page 146
<p>1 Q Okay. I'm sorry. Going back to this Matt Bridges</p> <p>2 email, Exhibit No. 2, Matt Bridges in his email</p> <p>3 apologizing to Commissioner Sims says, "I view the fight</p> <p>4 for voting rights as the most critical one of our time,</p> <p>5 and I let the passion get the better of me."</p> <p>6 What do you recall was the disagreement between</p> <p>7 Bridges and Commissioner Sims on what the fight for voting</p> <p>8 rights could mean?</p> <p>9 A I recall Commissioner Sims expressing that she</p> <p>10 didn't want to negotiate something that was legally</p> <p>11 required in the sense that the commission, if it has legal</p> <p>12 requirements, that that shouldn't be up to personal</p> <p>13 opinion and negotiation and would not make sense in</p> <p>14 negotiations with Graves, for Commissioner Graves to gain</p> <p>15 a negotiating upper hand for the commission adopting</p> <p>16 something that in her opinion was legally required.</p> <p>17 Q Sorry. What was in her opinion legally required?</p> <p>18 MS. GOLDMAN: Objection, vague.</p> <p>19 A My understanding is that she viewed a VRA compliant</p> <p>20 Yakima Valley district as something that the commission</p> <p>21 may be legally required to draw.</p> <p>22 Q (By Mr. Thrift-Viveros) And did Matt Bridges</p> <p>23 disagree with that?</p> <p>24 MS. GOLDMAN: Objection, calls for</p> <p>25 speculation.</p>	<p>1 A Not to my understanding, no.</p> <p>2 Q (By Mr. Thrift-Viveros) Okay. So -- Okay. So they</p> <p>3 weren't necessarily in disagreement on that at this</p> <p>4 meeting?</p> <p>5 MS. GOLDMAN: Objection, vague. Asked and</p> <p>6 answered.</p> <p>7 A No.</p> <p>8 Q (By Mr. Thrift-Viveros) Okay.</p> <p>9 MS. GOLDMAN: Counsel, I'm wondering --</p> <p>10 it's been an hour -- if we could take a break.</p> <p>11 MR. THRIFT-VIVEROS: Yeah, that's fine.</p> <p>12 (Break 2:27 p.m. to 2:40 p.m.)</p> <p>13 MR. THRIFT-VIVEROS: Let's go back on the</p> <p>14 record. Thank you.</p> <p>15 Q (By Mr. Thrift-Viveros) Just going back to a little</p> <p>16 bit of your job history, you mentioned that you worked in</p> <p>17 voter registration; is that right?</p> <p>18 A Yes.</p> <p>19 Q Were you like signing people up to register to vote,</p> <p>20 or was it a campaign?</p> <p>21 A I've worked both on campaigns and in purely voter</p> <p>22 registration capacities.</p> <p>23 Q Were you like out in the field signing people up to</p> <p>24 register to vote?</p> <p>25 A I have been.</p>
Page 147	Page 148
<p>1 Q Okay. I did some of that, too.</p> <p>2 Where did you do that work?</p> <p>3 A I have done voter registration efforts in Seattle,</p> <p>4 in SeaTac. And generally when I've been out working for</p> <p>5 campaigns I carry along voter registration forms and just</p> <p>6 bring them with me around the state.</p> <p>7 Q Okay. In that work did you learn anything about</p> <p>8 voter registration rates among different minority groups?</p> <p>9 A Yes.</p> <p>10 Q What have you learned?</p> <p>11 A I learned that there are disparities in terms of</p> <p>12 voter registration rates as they vary by race.</p> <p>13 Q And as far as you know how does the voting</p> <p>14 registration rates of Latinos compare with white voters?</p> <p>15 MS. GOLDMAN: I'm going to object that it</p> <p>16 calls for speculation, but if you know.</p> <p>17 A My understanding is that the voter registration rate</p> <p>18 is lower among Hispanic and Latino populations.</p> <p>19 Q (By Mr. Thrift-Viveros) Okay. Are you familiar at</p> <p>20 all with voter registration rates in the Yakima Valley</p> <p>21 area?</p> <p>22 A I remember reading information about that in the</p> <p>23 Complaint last night.</p> <p>24 Q Okay. But prior to the Complaint did you know</p> <p>25 anything about voter registration rates in the Yakima</p>	<p>1 Valley?</p> <p>2 A My understanding was that roughly those rates were</p> <p>3 lower than amongst white voters.</p> <p>4 Q Okay. And when you would draw maps during the</p> <p>5 redistricting process did you conduct analyses on your</p> <p>6 maps of voter registration rates?</p> <p>7 A No.</p> <p>8 Q Okay. Did you conduct analyses of voter</p> <p>9 registration rates on other maps circulated within the</p> <p>10 commission?</p> <p>11 A No.</p> <p>12 Q Okay. Do you know if anyone else, either a</p> <p>13 commissioner or a commission staff or someone contracted</p> <p>14 by a commissioner, conducted voter registration analyses</p> <p>15 of any map?</p> <p>16 A I believe so.</p> <p>17 Q Do you believe a specific person did, or --</p> <p>18 A My recollection is yes.</p> <p>19 Q And who is that?</p> <p>20 A Dr. Barreto's team.</p> <p>21 Q Okay. And anyone else?</p> <p>22 A Not to my knowledge.</p> <p>23 Q Okay. And sorry, I didn't clarify this before, but</p> <p>24 when I'm asking about voter registration rates I'm asking</p> <p>25 in general. So also that includes Latinos, non-Latinos.</p>

37 (Pages 145 to 148)

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

Osta Davis

August 19, 2022

Page 149	Page 150
<p>1 As far as you know no one other than Matt Barreto</p> <p>2 that worked in the commission or was contracted by the</p> <p>3 commission conducted analyses of voter registration</p> <p>4 figures; is that correct?</p> <p>5 A That's correct.</p> <p>6 Q Okay. Thanks. So let's see. Let's do this. So I</p> <p>7 have here an email sent by you on October 25th. That's</p> <p>8 Exhibit 3.</p> <p>9 (Davis Exhibit No. 3 introduced.)</p> <p>10 Q And did you send this email? Is that your name in</p> <p>11 the from line?</p> <p>12 A Yes.</p> <p>13 Q Okay. And do you recall sending this email?</p> <p>14 A I don't necessarily recall sending it, but that was</p> <p>15 my email.</p> <p>16 MR. THRIFT-VIVEROS: Okay. Sorry. I'm</p> <p>17 trying to drop this into the chat. I don't have -- For</p> <p>18 some reason I don't have a specific one, but this</p> <p>19 attachment -- and because of the nature of the production</p> <p>20 it was hard to -- There's no Bates stamp, but I'll</p> <p>21 represent that the document that's attached, stapled to</p> <p>22 this email is the attachment.</p> <p>23 And I just dropped it in the chat, and I'll screen</p> <p>24 share the statement, also.</p> <p>25 Q (By Mr. Thrift-Viveros) Do you recall drafting this</p>	<p>1 statement from Commissioner Sims?</p> <p>2 A I don't recall drafting it from scratch.</p> <p>3 Q Okay. So just a few questions.</p> <p>4 So you didn't draft it from scratch, but do you</p> <p>5 recall working on this statement?</p> <p>6 A Yes.</p> <p>7 Q Okay. And did you work on it with Commissioner Sims</p> <p>8 or with Dominique Meyers?</p> <p>9 MS. GOLDMAN: Objection, compound.</p> <p>10 A Yes.</p> <p>11 Q (By Mr. Thrift-Viveros) With both of them, or --</p> <p>12 A Yes.</p> <p>13 Q Okay. So one of the priorities or one of the</p> <p>14 sections of this statement says Values in Action and</p> <p>15 discusses the Voting Rights Act, and part of it says,</p> <p>16 "Commissioner Sims's updated map proposal responds to this</p> <p>17 directive by creating a majority Latino district based on</p> <p>18 citizen voting age population."</p> <p>19 Was this a priority of Commissioner Sims?</p> <p>20 MS. GOLDMAN: Was what a priority?</p> <p>21 Q (By Mr. Thrift-Viveros) Creating a Latino district</p> <p>22 based on citizen voting age population in the Yakima</p> <p>23 Valley, based on this statement.</p> <p>24 A Yes.</p> <p>25 Q Okay. And then it says, "The proposed district</p>
Page 151	Page 152
<p>1 unites the Yakama Nation Reservation and responds to the</p> <p>2 public testimony regarding the interconnectedness of the</p> <p>3 Latino and tribal communities within the Yakima Valley."</p> <p>4 Was that a priority of Commissioner Sims was to keep</p> <p>5 those two connected?</p> <p>6 A Yes.</p> <p>7 Q Okay. Do you recall public testimony regarding the</p> <p>8 interconnectedness of the Latino and tribal communities?</p> <p>9 A Yes.</p> <p>10 Q Do you recall specific people saying that, something</p> <p>11 to that effect?</p> <p>12 A I don't recall which specific people said it, but I</p> <p>13 remember that sentiment being expressed.</p> <p>14 Q Okay. Do you remember like what they said, even if</p> <p>15 you don't remember the specific people?</p> <p>16 A I remember them saying that there is an</p> <p>17 interconnectedness between those communities, and a lot of</p> <p>18 collaboration amongst those communities.</p> <p>19 Q Okay. And then it further says, "This district aims</p> <p>20 to undo historic wrongs that came from fracturing these</p> <p>21 communities amongst multiple districts."</p> <p>22 Do you know what that means, the historic wrongs</p> <p>23 that came from fracturing these communities?</p> <p>24 A My assumption is that that was in reference to</p> <p>25 previous maps.</p>	<p>1 Q Okay. And do you know what historic wrongs means in</p> <p>2 those maps?</p> <p>3 MS. GOLDMAN: Objection, asked and</p> <p>4 answered. Calls for speculation.</p> <p>5 Go ahead.</p> <p>6 A My understanding is that it just referenced the</p> <p>7 fracturing of those communities, in my sense particularly</p> <p>8 the current legislative maps at that time created by the</p> <p>9 2011 commission.</p> <p>10 MR. THRIFT-VIVEROS: Okay. So I have</p> <p>11 another email and attachment. You can mark it as</p> <p>12 Exhibit 4.</p> <p>13 (Davis Exhibit No. 4 introduced.)</p> <p>14 MR. THRIFT-VIVEROS: And I'll put it --</p> <p>15 MR. HOLT: And Counsel, could you please</p> <p>16 re-post Exhibit 3? It just posted the file path. The</p> <p>17 document actually never attached.</p> <p>18 MR. THRIFT-VIVEROS: Yes, that was my</p> <p>19 fault. I don't have -- Oh, it was just the file path?</p> <p>20 MR. HOLT: Yeah.</p> <p>21 MR. THRIFT-VIVEROS: Okay. I honestly</p> <p>22 don't know how to do this.</p> <p>23 MR. HERRERA: Which one?</p> <p>24 MR. THRIFT-VIVEROS: It was the statement.</p> <p>25 MR. HOLT: That's fine. You can just email</p>

38 (Pages 149 to 152)

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

Osta Davis

August 19, 2022

Page 153	Page 154
<p>1 it to me afterwards or tomorrow or something. It's not 2 huge, but I just want to make sure I get it. 3 MR. THRIFT-VIVEROS: Yes. 4 MR. HOLT: Thanks. 5 MR. THRIFT-VIVEROS: It's called Updated 6 Sims Statement. And then this one is October -- 7 And this one is called October 25th email. You can 8 add this one. 9 MR. HERRERA: Okay. 10 Q (By Mr. Thrift-Viveros) Okay. So is that your name 11 in the from section of this email? 12 A Yes. 13 Q Do you recall sending this email? 14 A Sure. 15 MR. THRIFT-VIVEROS: I'm going to open the 16 link that's attached to it, the Dave's Redistricting Link, 17 and I'll copy it. Okay. 18 (Document displayed.) 19 Q Do you recall working on this map? 20 A Yes. 21 Q Okay. So this map is titled V5 10/22/21, and you 22 submitted this on October 25th. This was sent about a 23 week after the map you sent on October 19th, 2021. 24 The map from October 19th has the majority Hispanic 25 CVAP district as District 15 with 51.7 percent Hispanic</p>	<p>1 CVAP, as we discussed. 2 This map has the majority Hispanic CVAP district at 3 51.6 percent, and it is District No. 14. 4 MS. GOLDMAN: Counsel, can I ask you a 5 question? 6 MR. THRIFT-VIVEROS: Yes. 7 MS. GOLDMAN: You're referring back to 8 Exhibit 1? 9 MR. THRIFT-VIVEROS: Yes. 10 MS. GOLDMAN: Okay. Thank you. 11 MR. THRIFT-VIVEROS: Sorry. They're about 12 a week apart. 13 MS. GOLDMAN: And I'm sorry, I don't know 14 if there was a question there. 15 MR. THRIFT-VIVEROS: Yeah. Sorry. 16 Q (By Mr. Thrift-Viveros) The question is why did -- 17 Do you know why the number of the Hispanic CVAP majority 18 district switched from 15 to 14? 19 A I believe that was at the direction of 20 Commissioner Sims. 21 Q Okay. Do you recall a conversation where she told 22 you that, to do that? 23 A I don't remember the specific conversation, but I 24 generally remember her directing me to do that. 25 Q Did she express why?</p>
Page 155	Page 156
<p>1 A Not that I recall specifically. 2 Q Okay. 3 (Court reporter discussion with counsel.) 4 (Screen shot taken.) 5 MR. THRIFT-VIVEROS: All right. Sorry. 6 There's a lot of maps, but we're going to keep looking at 7 them. So I'd like this marked as Exhibit 5. 8 (Davis Exhibit No. 5 introduced.) 9 Q (By Mr. Thrift-Viveros) And this is an email chain, 10 and I'd like you to take a look at it before I ask any 11 questions. And I'll put that in the -- 12 Now, let me know once you've taken a look. 13 A I have read it through. 14 Q Okay. So the first question, who is Kurt Fritts? 15 A Kurt Fritts was the assigned Redistricting 16 Commission staffer during the 2001 redistricting cycle. 17 Q Do you know what his job title was during the 18 redistricting process when you were emailing him? 19 A Currently? 20 Q Yes. If it's current, -- 21 A This year? 22 Q -- yeah. 23 A I do not know his particular job title. 24 Q Okay. And what capacity was he acting in in this 25 email exchange?</p>	<p>1 A He was acting in the capacity of a former 2 redistricting staff that occasionally provided feedback. 3 Q Okay. So he wasn't a formal consultant? 4 A No. 5 Q Do you know if he was hired by the commission for 6 consultation? 7 A My understanding is that he was not hired. 8 Q Okay. So on Zoom I'm going to open the Dave's 9 Redistricting link, but first off do you -- 10 Is that your name in the from line? 11 A Yes. 12 Q And do you recall sending this email? 13 A Yes. 14 Q Among the many emails I'm sure you sent. 15 Okay. So I'm opening the attachment from the Dave's 16 Redistricting email. 17 MS. GOLDMAN: Counsel, can I ask you a 18 question about the document? 19 MR. THRIFT-VIVEROS: Yes. 20 MS. GOLDMAN: So is it your view that the 21 last page of this set of emails is appended to the first 22 page? 23 MR. THRIFT-VIVEROS: Oh, did I get the 24 order wrong? 25 MS. GOLDMAN: I just --</p>

39 (Pages 153 to 156)

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

Osta Davis

August 19, 2022

Page 157	Page 158
<p>1 MR. THRIFT-VIVEROS: Sorry.</p> <p>2 MS. GOLDMAN: I'm not sure. Is this map</p> <p>3 what you just clicked on for the link, the live link?</p> <p>4 MR. THRIFT-VIVEROS: Yeah, the map</p> <p>5 that's --</p> <p>6 MS. GOLDMAN: On the first page.</p> <p>7 MR. THRIFT-VIVEROS: -- on the first page,</p> <p>8 yeah.</p> <p>9 MS. GOLDMAN: Thank you.</p> <p>10 MR. THRIFT-VIVEROS: Oh, you mean the last</p> <p>11 page here is the map, right.</p> <p>12 Q (By Mr. Thrift-Viveros) Okay. So let's take a look</p> <p>13 at this map. It's entitled the November 10, '21 Proposal,</p> <p>14 and in your email you wrote, "Here's an updated version of</p> <p>15 a majority Hispanic CVAP district."</p> <p>16 MS. GOLDMAN: Okay. Counsel, I need to</p> <p>17 object here because the email is dated November 2nd.</p> <p>18 MR. THRIFT-VIVEROS: Okay. Well, the email</p> <p>19 is dated November 2nd; and the map is dated November 10th</p> <p>20 or is titled 11/10/21, and this is the email -- This is</p> <p>21 the map that is attached to the November 2nd email.</p> <p>22 MS. GOLDMAN: Okay.</p> <p>23 MR. THRIFT-VIVEROS: I can open it again if</p> <p>24 you'd like me to.</p> <p>25 MS. GOLDMAN: Sure. If you wouldn't mind</p>	<p>1 one more time, --</p> <p>2 MR. THRIFT-VIVEROS: Yeah.</p> <p>3 MS. GOLDMAN: -- that would be great.</p> <p>4 MR. THRIFT-VIVEROS: I'll close it, and</p> <p>5 then I will --</p> <p>6 Can you see it on the screen share?</p> <p>7 MS. GOLDMAN: Yes. Thank you.</p> <p>8 MR. THRIFT-VIVEROS: So I'll open it here,</p> <p>9 copy, paste. And now the title is not showing up, but --</p> <p>10 I'm going to pull up these statistics -- No?</p> <p>11 MS. GOLDMAN: There it is.</p> <p>12 MR. THRIFT-VIVEROS: There it is, 11/10/21</p> <p>13 Proposal.</p> <p>14 Q (By Mr. Thrift-Viveros) I guess let me start with</p> <p>15 that. Do you know why this map is titled 11/10/21</p> <p>16 Proposal, even though you sent it on November 2nd?</p> <p>17 A My estimation would be that it's likely that the</p> <p>18 version that was sent on the 2nd was adjusted between the</p> <p>19 2nd and the 10th.</p> <p>20 Q Okay. So in this map the Hispanic CVAP district is</p> <p>21 District 14 right here, and it has a 50.0 percent Hispanic</p> <p>22 CVAP; is that correct?</p> <p>23 A Yes, that's correct.</p> <p>24 Q Do you know why the Hispanic CVAP has gone down in</p> <p>25 this district since the last map that was -- that we were</p>
Page 159	Page 160
<p>1 looking at? I forgot the exhibit number.</p> <p>2 MS. GOLDMAN: Counsel, are you referring to</p> <p>3 Exhibit 4?</p> <p>4 MR. THRIFT-VIVEROS: Yes. I need to mark</p> <p>5 them myself. So Exhibit 1, 2, 3, 4.</p> <p>6 A My recollection was that it was at the direction of</p> <p>7 Commissioner Sims.</p> <p>8 Q (By Mr. Thrift-Viveros) Do you recall anything</p> <p>9 specific from Commissioner Sims altering this map?</p> <p>10 A No.</p> <p>11 Q Okay. And so far we've been looking at the citizen</p> <p>12 voting age population 2019, or numbers from the 2019 ACS,</p> <p>13 American Community Survey; is that correct?</p> <p>14 A Yes.</p> <p>15 Q And when you were drafting these maps did you use</p> <p>16 the census data as well?</p> <p>17 MS. GOLDMAN: I'm going to object to "these</p> <p>18 maps" as being vague.</p> <p>19 MR. THRIFT-VIVEROS: Okay.</p> <p>20 Q (By Mr. Thrift-Viveros) When you -- Actually, yes,</p> <p>21 let's focus on this one. When you were drawing this map</p> <p>22 did you take into account census data as well as the ACS</p> <p>23 data?</p> <p>24 A Yes.</p> <p>25 Q How did you use the census data?</p>	<p>1 A My understanding is that the PL file was uploaded</p> <p>2 into Dave's, and that was the primary tool in terms of</p> <p>3 drawing districts.</p> <p>4 Q And when you say primary tool -- Sorry. I'm just</p> <p>5 looking at Dave's, the statistics right now on the right</p> <p>6 side, right of this map.</p> <p>7 Which one? Is it the voting age population 2020</p> <p>8 that corresponds with the census data that you would use?</p> <p>9 A I don't recall all of the options that Dave's had.</p> <p>10 Q Okay. If I click on this little thing and we look</p> <p>11 at these datasets, would that help?</p> <p>12 A My understanding is that total population 2020 was</p> <p>13 the census data, but that I would have to verify that or</p> <p>14 read through Dave's Redistricting's explanation of their</p> <p>15 datasets.</p> <p>16 (Screen shot taken.)</p> <p>17 MR. THRIFT-VIVEROS: Okay. I have one more</p> <p>18 email exhibit here, and we'll mark it as Exhibit 6.</p> <p>19 (Davis Exhibit No. 6 introduced.)</p> <p>20 MR. THRIFT-VIVEROS: So just for context,</p> <p>21 Exhibit 5, the email and the map that we were looking at</p> <p>22 on Dave's was sent on November 2nd.</p> <p>23 MS. GOLDMAN: I'm going to object. That</p> <p>24 misstates the testimony regarding the date of the map that</p> <p>25 we just looked at.</p>

40 (Pages 157 to 160)

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

Osta Davis

August 19, 2022

Page 161	Page 162
<p>1 MR. THRIFT-VIVEROS: The email was sent on</p> <p>2 November 2nd. And let me share this document. I will</p> <p>3 represent that this second page of the exhibit and what I</p> <p>4 just shared in the chat is the linked attachment to this</p> <p>5 email contained in the document production.</p> <p>6 Q (By Mr. Thrift-Viveros) So do you recall sending</p> <p>7 this email?</p> <p>8 A Vaguely.</p> <p>9 Q Do you know if this map is different from the map of</p> <p>10 Exhibit 5?</p> <p>11 MS. GOLDMAN: I'm going to object. It</p> <p>12 calls for speculation.</p> <p>13 A The description of the map indicates that it's</p> <p>14 different.</p> <p>15 Q (By Mr. Thrift-Viveros) Okay. Do you recall what</p> <p>16 changed between the two maps, November 2nd and this map?</p> <p>17 MS. GOLDMAN: Again, I'm going to object</p> <p>18 that it misstates the testimony regarding the date of the</p> <p>19 map that is appended to Exhibit 5.</p> <p>20 Q (By Mr. Thrift-Viveros) The map that you sent by</p> <p>21 email on November 2nd versus this map that you sent by</p> <p>22 email on November 4th.</p> <p>23 A I guess it would be hard to know what map was sent</p> <p>24 on November 2nd, as there likely could have been edits to</p> <p>25 that map between the 2nd and the 10th.</p>	<p>1 Q Okay. Do you know why you sent this map in</p> <p>2 Exhibit 6 as a PDF?</p> <p>3 A No.</p> <p>4 Q Okay. And do you know why the Hispanic CVAP number</p> <p>5 has gone up from 50 in the map that you sent on</p> <p>6 November 2nd to 51.3 percent in the map that you sent on</p> <p>7 November 4th?</p> <p>8 MS. GOLDMAN: Again, misstates the</p> <p>9 testimony regarding the date of the map that is appended</p> <p>10 to Exhibit 5.</p> <p>11 A I know that we looked at many different iterations</p> <p>12 of the district; so I couldn't say for sure exactly why</p> <p>13 this one was different, though it wasn't surprising</p> <p>14 considering we looked at many versions of this district.</p> <p>15 Q (By Mr. Thrift-Viveros) Okay. Do you know why there</p> <p>16 were so many different iterations of this district?</p> <p>17 MS. GOLDMAN: Objection, vague.</p> <p>18 A This district was a priority for the commissioners,</p> <p>19 and my recollection is that they were interested in seeing</p> <p>20 different versions of how this district could be drawn.</p> <p>21 Q (By Mr. Thrift-Viveros) Okay. Why was it a priority</p> <p>22 for -- Sorry. Did you say it was a priority for all the</p> <p>23 commissioners?</p> <p>24 A I believe I said that.</p> <p>25 Q Okay. Why was it a priority for all the</p>
Page 163	Page 164
<p>1 commissioners? I believe we discussed a little bit, but I</p> <p>2 just want to know why it was a priority for all the</p> <p>3 commissioners.</p> <p>4 MS. GOLDMAN: Objection, asked and</p> <p>5 answered.</p> <p>6 A In part because the public had a strong interest in</p> <p>7 this region.</p> <p>8 Q (By Mr. Thrift-Viveros) Okay. Can you describe in</p> <p>9 sort of general terms what was different about the</p> <p>10 different iterations of this district?</p> <p>11 MS. GOLDMAN: Objection, vague and</p> <p>12 ambiguous.</p> <p>13 A Different iterations of this district had different</p> <p>14 political performance, citizen voting age population</p> <p>15 adjustments, and different precincts and census blocs and</p> <p>16 geographic areas as well as numbering.</p> <p>17 Q (By Mr. Thrift-Viveros) As far as you know did the</p> <p>18 configuration of this district change based on whether it</p> <p>19 would vote Republican or Democrat?</p> <p>20 MS. GOLDMAN: Objection, vague.</p> <p>21 A I recall commissioners wanting to see versions of</p> <p>22 this district that considered a number of factors in</p> <p>23 different political performance would look like as it</p> <p>24 relates to this district.</p> <p>25 Q (By Mr. Thrift-Viveros) So would you say that that</p>	<p>1 was -- the electoral performance was an influence on the</p> <p>2 contours of this district?</p> <p>3 MS. GOLDMAN: Objection, vague.</p> <p>4 A I would say that the political performance was</p> <p>5 something that we reported to the commissioners in the</p> <p>6 different iterations of the district.</p> <p>7 Q (By Mr. Thrift-Viveros) Okay. Sorry. Give me one</p> <p>8 second.</p> <p>9 All right. Continuing on the march to November 15,</p> <p>10 I have another email here and another map.</p> <p>11 THE REPORTER: This will be Exhibit 7.</p> <p>12 MR. THRIFT-VIVEROS: Exhibit 7. Thank you.</p> <p>13 And oh, yeah, let me put it in the chat.</p> <p>14 (Davis Exhibit No. 7 introduced.)</p> <p>15 Q All right. Have you had a chance to look at it?</p> <p>16 A Yes.</p> <p>17 Q Okay. I'll screen share here.</p> <p>18 (Document displayed.)</p> <p>19 Q Is that your name in the carbon copy line, the cc</p> <p>20 line?</p> <p>21 A Yes.</p> <p>22 Q Do you recall receiving this email?</p> <p>23 A Yes.</p> <p>24 Q Okay. So this email is from -- it's a forward of an</p> <p>25 email that Commissioner Sims sent to Commissioner Graves</p>

41 (Pages 161 to 164)

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

Osta Davis

August 19, 2022

Page 165	Page 166
<p>1 regarding, quote, "our latest proposal" on November 12th. 2 So Commissioner -- I'm sorry. 3 Do you recall if you drew this map that Commissioner 4 Sims has attached to this email? 5 A I believe that I did draw this map. 6 Q Okay. 7 A Well, or -- Let me clarify. It's -- From this 8 printout attachment it's actually hard to tell -- 9 Q Yeah. 10 A -- what the map is. 11 MR. THRIFT-VIVEROS: Sorry. I had a bad 12 job of screen shotting. So I'm going to open on the 13 screen share, and we can take a look at it in Dave's 14 Redistricting. So I'm going to look at it right now, and 15 this map that was send on November 12th has a title of 16 11/12. 17 (Document displayed.) 18 MS. GOLDMAN: Counsel, is it possible to 19 put all of the map on the screen, the bottom part? 20 MR. THRIFT-VIVEROS: What does it look like 21 in yours? 22 MS. GOLDMAN: It just kind of cuts off at 23 the bottom. 24 MR. THRIFT-VIVEROS: I can definitely try 25 moving it up.</p>	<p>1 MS. GOLDMAN: There you go. Thank you. 2 MR. THRIFT-VIVEROS: Is that okay? 3 MS. GOLDMAN: Yes. 4 MR. THRIFT-VIVEROS: Good. 5 MS. GOLDMAN: And I'm sorry, I don't recall 6 if there was a question pending. 7 MR. THRIFT-VIVEROS: No, I just wanted to 8 -- 9 MS. GOLDMAN: Okay. Thank you. 10 MR. THRIFT-VIVEROS: -- take a look at it. 11 Sorry. No, there was not any -- 12 MS. GOLDMAN: Okay. Thank you. Sorry. 13 Q (By Mr. Thrift-Viveros) So I just have a few 14 questions. So do you -- and sorry if I missed your 15 answer. 16 Do you recall working on this map? 17 A Yes. My memory is that I helped draft this map. 18 Q Okay. And I just want to resolve a discrepancy 19 between Commissioner Sims's email on November 12th to 20 Commissioner Graves and what I'm seeing in Dave's 21 Redistricting because in the 15th legislative district, 22 which my cursor is hovering over on Dave's, it shows ACS 23 2019 CVAP Hispanic as 47.8 percent, but in Commissioner 24 Sims's email she writes 49.2 percent. 25 Do you know why there's that discrepancy?</p>
Page 167	Page 168
<p>1 A It looks like in terms of what I'm looking at on the 2 screen is there seems to be a block of unassigned 3 precincts. 4 Q Is it over here where I'm -- 5 A Yes. 6 Q Okay. Okay. Well, that helps. 7 So these precincts were not part of any district in 8 this current map? 9 A By my estimation it seems likely that those 10 districts were assigned when Commissioner Sims sent the 11 map -- 12 Q Okay. 13 A -- and may have been -- They're currently not 14 assigned now. 15 Q Okay. Thank you. So do you believe that something 16 happened to this map, as in someone edited it perhaps to 17 make another map between the time of Commissioner Sims 18 sending that email and now? 19 A That is how I would understand this map. 20 Q Okay. In Commissioner Sims's email to 21 Commissioner Graves she wrote, "Our analysis shows that" 22 -- in the first bullet point -- "Our analysis shows that 23 the ACS 2019 data significantly undercounts minority CVAP 24 numbers." 25 Do you know what analysis she's referring to in this</p>	<p>1 email? 2 A Yes. 3 Q And what analysis was that? 4 A Dr. Barreto's presentation. 5 Q Okay. And, "We feel solid that a 2020 CVAP for this 6 district would likely still have the Hispanic CVAP over 7 50 percent." 8 Do you know why Commissioner Sims felt, quote, 9 unquote, "felt solid about the 2020 CVAP for this district 10 being over 50 percent"? 11 A I believe she was referencing Dr. Barreto's 12 presentation that indicated that the 2019 numbers were an 13 undercount. 14 Q So there was no outside -- There was only Matt 15 Barreto's analysis for the likelihood that a 2020 CVAP 16 would be significantly -- or not significantly -- yeah, 17 that would be higher than 50 percent? 18 Sorry. To reach this conclusion that Commissioner 19 Sims wrote here about, "Our analysis shows this, and we 20 feel solid that a 2020 CVAP for this district would be 21 over 50 percent," this is all based only on Dr. Barreto's 22 report -- 23 A Yes. 24 Q -- to your understanding? Okay. 25 (Screen shot taken.)</p>

42 (Pages 165 to 168)

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

Osta Davis

August 19, 2022

Page 169	Page 170
<p>1 Q Okay. Not many more exhibits. I promise. Here's</p> <p>2 one right here.</p> <p>3 THE REPORTER: This will be No. 8.</p> <p>4 (Davis Exhibit No. 8 introduced.)</p> <p>5 MR. THRIFT-VIVEROS: No. 8. So just a few</p> <p>6 questions on this one. Let me upload it to the --</p> <p>7 MS. GOLDMAN: Counsel, --</p> <p>8 MR. THRIFT-VIVEROS: Yes.</p> <p>9 MS. GOLDMAN: -- I know that there is --</p> <p>10 This is from a lawyer. Would you mind if we took a break</p> <p>11 so that I can consult with counsel here?</p> <p>12 MR. THRIFT-VIVEROS: Oh, okay. Yes.</p> <p>13 MS. GOLDMAN: Before you ask any questions.</p> <p>14 MR. THRIFT-VIVEROS: Yes, that's fine.</p> <p>15 MS. GOLDMAN: Thank you.</p> <p>16 MS. FRANKLIN: Hang on one second.</p> <p>17 (Discussion off the record.)</p> <p>18 (Pause in proceedings.)</p> <p>19 MS. GOLDMAN: So thank you, Counsel, for</p> <p>20 giving me an opportunity. We have no objection.</p> <p>21 MR. THRIFT-VIVEROS: Okay. Thank you.</p> <p>22 Did we mark this exhibit?</p> <p>23 THE REPORTER: This is No. 8.</p> <p>24 MR. THRIFT-VIVEROS: So this Exhibit 8 is</p> <p>25 an email. Yeah, I don't believe there's any privileged</p>	<p>1 information here, but I just have a few questions.</p> <p>2 Q (By Mr. Thrift-Viveros) So this email is from</p> <p>3 Adam Hall, Senior Policy and Redistricting Counsel with</p> <p>4 the State Senate Democratic Caucus.</p> <p>5 Did you work with Adam Hall in the redistricting</p> <p>6 process?</p> <p>7 A Yes.</p> <p>8 Q Okay. In what capacity?</p> <p>9 A Adam Hall and I attended meetings together and</p> <p>10 exchanged emails with one another.</p> <p>11 Q Okay. And not to go too much into the substance of</p> <p>12 those emails, but did he provide counsel on compliance</p> <p>13 with the Voting Rights Act?</p> <p>14 A He primarily worked with Commissioner Walkinshaw, --</p> <p>15 Q Okay.</p> <p>16 A -- so I do not recall requesting advice or counsel</p> <p>17 from him.</p> <p>18 Q Okay. And his email, which is on the lower part of</p> <p>19 this sheet, was to Kamau Chege. I apologize if I'm</p> <p>20 mispronouncing that name, but do you know who that is?</p> <p>21 A Yes.</p> <p>22 Q And who is that?</p> <p>23 A I believe he's the executive director of the</p> <p>24 Washington Community Alliance, though I'm not particularly</p> <p>25 sure of his current title.</p>
Page 171	Page 172
<p>1 Q Okay. Do you know -- Can you tell me a little bit</p> <p>2 about the Washington Community Alliance, what you know?</p> <p>3 A My understanding is that they receive funding</p> <p>4 regarding certain advocacy priorities and work with a</p> <p>5 number of coalition partners.</p> <p>6 Q Did you meet with Mr. Chege or representatives from</p> <p>7 the Washington Community Alliance in the course of the</p> <p>8 redistricting process?</p> <p>9 A Yes.</p> <p>10 Q Okay. What meetings did you have with them, or how</p> <p>11 many meetings did you have with them that you recall?</p> <p>12 A I don't recall how many meetings I had with Kamau,</p> <p>13 though I believe that members of the Washington Community</p> <p>14 Alliance were also part of the Redistricting Justice</p> <p>15 Coalition.</p> <p>16 Q Okay. Do you recall what you discussed in the</p> <p>17 meetings with the Washington Community Alliance?</p> <p>18 A I guess there were a number of meetings with the</p> <p>19 Washington Redistricting Coalition, --</p> <p>20 Q Okay.</p> <p>21 A -- which was comprised of members of that Alliance.</p> <p>22 Q Okay. And this email was also sent to Katie Stultz.</p> <p>23 Do you know who Katie Stultz is?</p> <p>24 A Yes.</p> <p>25 Q Is she affiliated with an organization called Win/</p>	<p>1 Win Action?</p> <p>2 A Yes.</p> <p>3 Q What can you tell me about that organization?</p> <p>4 A I believe that Win/Win helps provide data and</p> <p>5 elections databases to progressive organizations.</p> <p>6 Q Do you know what kind of data?</p> <p>7 A My understanding is that they provide voter file</p> <p>8 information.</p> <p>9 Q Okay. Did they provide you with any data for your</p> <p>10 redistricting work?</p> <p>11 A My recollection is that Katie Stultz was similarly</p> <p>12 part of the Redistricting Justice Coalition, and they</p> <p>13 provided proposals that they would like in regards to</p> <p>14 certain districts.</p> <p>15 Q Okay.</p> <p>16 A So they presented that data to us.</p> <p>17 Q Do you recall which districts?</p> <p>18 A Not all of them off the top of my head.</p> <p>19 Q Okay. Were they interested in the districts in the</p> <p>20 Yakima Valley region?</p> <p>21 A Yes.</p> <p>22 Q Okay. Do you recall what they asked for for a</p> <p>23 district in the Yakima Valley region?</p> <p>24 A I remember multiple requests.</p> <p>25 Q Anything specific?</p>

43 (Pages 169 to 172)

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

Osta Davis

August 19, 2022

Page 173	Page 174
<p>1 A I remember that following our -- Commissioner Sims' second release of maps that they had submitted their own version of a Yakima Valley district for us to consider.</p> <p>2 Q Do you recall using their proposed maps to help you draw your own maps?</p> <p>3 A I recall analyzing those maps and considering those maps.</p> <p>4 Q Okay. And this email is regarding scheduling a call for coalition leaders and members to meet with Dr. Matt Barreto, and this email also mentions that Dr. Barreto met with Democratic commissioners this morning -- the morning of November 14th, I'm assuming.</p> <p>5 Were you present at that morning meeting with Dr. Barreto and the commissioners on November 14th?</p> <p>6 A No.</p> <p>7 Q Okay. Did you attend the meeting that was being scheduled, the call being scheduled for 3:30 that day?</p> <p>8 A I believe so, yes.</p> <p>9 Q Do you remember what you discussed?</p> <p>10 A Yes.</p> <p>11 Q What was that?</p> <p>12 A Yakima Valley.</p> <p>13 Q And in specific terms what?</p> <p>14 A I believe we discussed the Redistricting Justice Commission's proposed district for that region.</p> <p>15</p>	<p>1 Q Do you recall what the Hispanic CVAP was for the Redistricting Justice Coalition's map?</p> <p>2 MS. GOLDMAN: Objection, calls for speculation.</p> <p>3 A No.</p> <p>4 Q (By Mr. Thrift-Viveros) Okay. Do you recall if the Redistricting Justice Coalition's map was significantly different than the maps that you had been drawing up to that point?</p> <p>5 A Yes.</p> <p>6 Q Do you recall in what way?</p> <p>7 A Not particularly.</p> <p>8 Q Do you recall anything about the differences between the proposed map from the Redistricting Justice Coalition and your maps?</p> <p>9 A I think I remember their maps connecting Pasco with Yakima, but I couldn't say for certain.</p> <p>10 Q And when you say connecting Pasco with Yakima, do you mean Yakima City?</p> <p>11 A Not in its entirety.</p> <p>12 Q Did your maps that you had been drawing, such as the map of Exhibit -- so this is my fault -- sorry -- the one that's titled 11/12.</p> <p>13 MS. GOLDMAN: Seven.</p> <p>14 Q (By Mr. Thrift-Viveros) From Exhibit 7.</p> <p>15</p>
Page 175	Page 176
<p>1 MR. THRIFT-VIVEROS: And I can pull it up. I have it in front of me on Dave's Redistricting. I can put it on screen share.</p> <p>2 (Document displayed.)</p> <p>3 Q (By Mr. Thrift-Viveros) Did this map connect Pasco and the City of Yakima?</p> <p>4 MS. GOLDMAN: And I'm going to object that the witness testified that this is a different map than the one that was sent that's part of Exhibit 7.</p> <p>5 A Yeah, this is a different map than what that email is referring to.</p> <p>6 Q (By Mr. Thrift-Viveros) Sorry. Which map is Exhibit 7? I meant the email from November 12 from April Sims. Yeah, so this map is the one that I have pulled up here. I can reopen it again.</p> <p>7 MS. GOLDMAN: No, the witness testified that there were changes made to that map.</p> <p>8 MR. THRIFT-VIVEROS: Oh, right, with the precinct. My apologies on that.</p> <p>9 Well, we can move on from this exhibit.</p> <p>10 Q (By Mr. Thrift-Viveros) Well, sorry. Going back to this last exhibit, this email and the meeting with Dr. Barreto and the Redistricting Justice Coalition, had they -- had members of the Redistricting Justice Coalition seen the latest proposed map from Commissioner Sims that</p> <p>11</p>	<p>1 you had drawn?</p> <p>2 MS. GOLDMAN: Objection, calls for speculation.</p> <p>3 A It was my understanding that they had seen the version that Commissioner Sims had posted publicly.</p> <p>4 Q (By Mr. Thrift-Viveros) In October?</p> <p>5 A Yes.</p> <p>6 Q Okay. But you did not -- You personally did not send the latest proposed map from Commissioner Sims from November 12th to members of the Redistricting Justice Coalition?</p> <p>7 A I do not remember or believe that I had done that.</p> <p>8 Q Okay.</p> <p>9 MR. THRIFT-VIVEROS: And I have one more email to mark as Exhibit 9.</p> <p>10 (Davis Exhibit No. 9 introduced.)</p> <p>11 MS. GOLDMAN: Do you have another one?</p> <p>12 MR. THRIFT-VIVEROS: Yes. Let me upload it to the Zoom chat. I don't have it right in front of me, but I'll send it to everyone later.</p> <p>13 This is Exhibit 9?</p> <p>14 THE REPORTER: Yes.</p> <p>15 MR. THRIFT-VIVEROS: Okay. I'll send it to everyone later. Sorry about that. I have a printout, but I can't find the file. This is my first hybrid</p> <p>16</p>

44 (Pages 173 to 176)

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

Osta Davis

August 19, 2022

Page 177	Page 178
<p>1 deposition, so I apologize to everyone on the remote, but</p> <p>2 I will send it around.</p> <p>3 Q (By Mr. Thrift-Viveros) So do you recall receiving</p> <p>4 this top email from Anton Grose to you on November 13th?</p> <p>5 A Yes.</p> <p>6 Q Okay. And do you recall receiving this email that's</p> <p>7 below the email from Anton Grose sent by Commissioner</p> <p>8 Graves to Commissioner Sims, and you are cc'd on it?</p> <p>9 Do you recall this, receiving this?</p> <p>10 A Sent from --</p> <p>11 Q Commissioner Graves.</p> <p>12 A Vaguely.</p> <p>13 Q Okay. And in Commissioner Graves' email he says,</p> <p>14 "We made this CVAP district the 15th rather than the 14th</p> <p>15 for ease of incumbents."</p> <p>16 Do you know what that means?</p> <p>17 A Yes.</p> <p>18 Q What does that mean?</p> <p>19 A It means that -- or my understanding of that is a</p> <p>20 desire to displace a fewer number of incumbent</p> <p>21 legislators.</p> <p>22 Q And do you know how changing the CVAP district from</p> <p>23 the 14th district to the 15th district affected</p> <p>24 incumbents?</p> <p>25 A My understanding is that it displaced some</p>	<p>1 incumbents, but I'm not sure exactly which incumbents</p> <p>2 those -- that was.</p> <p>3 Q Okay. And then is your understanding that</p> <p>4 Commissioner Graves's proposal here affected fewer</p> <p>5 incumbents than by -- Changing the CVAP district from 14</p> <p>6 to 15 affected fewer incumbents than it would have</p> <p>7 otherwise?</p> <p>8 A That is my assumption. I would have to look at the</p> <p>9 maps and addresses to know for sure if that was the case,</p> <p>10 but --</p> <p>11 Q Okay. Yeah.</p> <p>12 A -- that's my assumption.</p> <p>13 Q Okay. That's fine.</p> <p>14 And then Commissioner Graves also mentions it,</p> <p>15 referring to the 15th district, which was the CVAP</p> <p>16 district, "It's not just below the 2019 CVAP you proposed,</p> <p>17 but instead it's just over 50 percent CVAP."</p> <p>18 When he says "we made the CVAP district," is it your</p> <p>19 understanding that that means the Latino majority CVAP</p> <p>20 district?</p> <p>21 A Yes.</p> <p>22 Q Okay. Do you know if Commissioner Sims had any</p> <p>23 thoughts about this proposal where the Republican</p> <p>24 commissioner is presenting a district with over 50 percent</p> <p>25 CVAP versus her district that proposed less than</p>
Page 179	Page 180
<p>1 50 percent CVAP?</p> <p>2 A Yes.</p> <p>3 Q What was -- What did she tell you about that?</p> <p>4 A My recollection is that she took that as an</p> <p>5 indication that Commissioner Graves may have been under</p> <p>6 the opinion that the commission was required to create a</p> <p>7 majority Hispanic CVAP district.</p> <p>8 Q Okay. Do you know if -- Beyond this email do you</p> <p>9 know if Commissioner Graves expressed that to</p> <p>10 Commissioner Sims?</p> <p>11 A Not to my memory.</p> <p>12 Q Okay. So her statement that she believes that</p> <p>13 Commissioner Graves is now looking for a majority Hispanic</p> <p>14 CVAP district was based on this email, as you understand?</p> <p>15 MS. GOLDMAN: Objection, vague. Calls for</p> <p>16 speculation.</p> <p>17 A In my recollection that opinion of hers was conveyed</p> <p>18 through conversation.</p> <p>19 Q (By Mr. Thrift-Viveros) Okay. Did you have an</p> <p>20 opinion on the fact that the Republican commissioner</p> <p>21 proposed a CVAP district that had a higher percentage than</p> <p>22 the one proposed by Commissioner Sims?</p> <p>23 A I agreed with Commissioner Sims' assessment and</p> <p>24 opinion in that situation.</p> <p>25 Q That opinion being that Commissioner Graves was --</p>	<p>1 Sorry. What was that opinion?</p> <p>2 A That opinion was that this was the first more solid</p> <p>3 indication we had that Commissioner Graves wanted or</p> <p>4 potentially thought that the map needed to have a majority</p> <p>5 Hispanic CVAP district.</p> <p>6 Q Okay. And then further down on the same Exhibit 9</p> <p>7 there's one more email from Commissioner Graves, and he</p> <p>8 says, "It starts with the 14th as you proposed it most</p> <p>9 recently. That involves a three point shift in partisan</p> <p>10 performance, and in exchange the map makes the 47th just</p> <p>11 .36 percent better for Republicans."</p> <p>12 Do you know what he's referring to when he says</p> <p>13 three point shift in partisan performance?</p> <p>14 A My understanding is that that would likely have</p> <p>15 represented a shift in the State Treasurer performance.</p> <p>16 Q In the direction of which party?</p> <p>17 A A shift, an increase in Republican performance as it</p> <p>18 related to Duane Davidson's results.</p> <p>19 Q Okay. Do you recall Commissioner Sims -- Beyond</p> <p>20 what you've already mentioned about her opinion on</p> <p>21 Commissioner Graves demonstrating for the first time an</p> <p>22 interest in a majority Hispanic CVAP district, other than</p> <p>23 that opinion do you recall Commissioner Sims having an</p> <p>24 opinion on or expressing an opinion to you on this</p> <p>25 proposal?</p>

45 (Pages 177 to 180)

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

Osta Davis

August 19, 2022

Page 181	Page 182
<p>1 A Vaguely.</p> <p>2 Q Do you recall what that opinion was?</p> <p>3 A In my recollection I remember that Commissioner</p> <p>4 Sims' opinion was that because Commissioner Graves had</p> <p>5 gone back and made it a majority Hispanic CVAP district of</p> <p>6 his own will, that that first bullet point regarding</p> <p>7 improving Republican performance elsewhere didn't hold</p> <p>8 weight.</p> <p>9 Q Okay. What do you mean by that, it didn't hold</p> <p>10 weight?</p> <p>11 A My recollection was that Commissioner Sims thought</p> <p>12 this was an indication that Commissioner Graves thought we</p> <p>13 had some sort of legal responsibility in the Yakima Valley</p> <p>14 region, and because of that legal responsibility it was</p> <p>15 not the same situation as a one-for-one district trade in</p> <p>16 terms of partisan performance.</p> <p>17 Q Okay. And up until that point had the negotiations</p> <p>18 with Commissioner Sims and Commissioner Graves as you</p> <p>19 understood it involved more of that one-for-one trade of</p> <p>20 districts in regards to partisan performance?</p> <p>21 A My recollection is that Commissioner Sims had always</p> <p>22 made it clear that she did not want to have to negotiate</p> <p>23 down for something that was a legal requirement, --</p> <p>24 Q Um-hmm.</p> <p>25 A -- and that was not her interest in negotiations.</p>	<p>1 She also made it clear that the areas of the state</p> <p>2 that had grown the most in the last ten years were in</p> <p>3 primarily strong Democratic areas, and that a one-for-one</p> <p>4 trade wouldn't be appropriate given the shifting state</p> <p>5 demographics.</p> <p>6 Q Okay. Going back to Exhibit 7, the proposal from</p> <p>7 Commissioner Sims, as you understand it -- and we don't</p> <p>8 have to look at the map. We can just look at her email</p> <p>9 where she says, "The 15th legislative district is now</p> <p>10 49.2 percent in ACS 2019 CVAP estimates."</p> <p>11 Do you understand Commissioner Sims's proposal -- Or</p> <p>12 do you understand -- Sorry. Strike this.</p> <p>13 In your understanding when Commissioner Sims sent</p> <p>14 this proposal did she consider this district to be</p> <p>15 compliant with the Voting Rights Act?</p> <p>16 MS. GOLDMAN: Objection, calls for</p> <p>17 speculation.</p> <p>18 A I do not believe that Commissioner Sims had done</p> <p>19 analysis regarding whether this was compliant with the</p> <p>20 Voting Rights Act.</p> <p>21 MR. THRIFT-VIVEROS: Okay. All right. I</p> <p>22 have another exhibit here. We'll mark it as Exhibit 10.</p> <p>23 (Davis Exhibit No. 10 introduced.)</p> <p>24 Q (By Mr. Thrift-Viveros) I won't ask you to</p> <p>25 authenticate this because this is a memo from Ali O'Neil</p>
Page 183	Page 184
<p>1 to Senate Majority Billig, and I kind of want to use this</p> <p>2 as a guide for the last few days of the redistricting</p> <p>3 process.</p> <p>4 Have you seen this memo before?</p> <p>5 A I believe so.</p> <p>6 Q Okay. Have you read it all through? It's like</p> <p>7 eight pages.</p> <p>8 A Previously.</p> <p>9 Q Okay. If you want to take a couple minutes to go</p> <p>10 through it again, but I just wanted to point out specific</p> <p>11 events and see how you remember it.</p> <p>12 Would you like to take a moment just to skim it,</p> <p>13 or --</p> <p>14 A Go for it.</p> <p>15 Q Okay. So I guess my first question is this memo,</p> <p>16 did you view a draft of this memo before Ali O'Neil sent</p> <p>17 it to the Senate Majority Leader?</p> <p>18 A No.</p> <p>19 Q Okay. The first sentence of the memo -- Oh, yeah,</p> <p>20 let me put it in the chat. Sorry.</p> <p>21 So in the first sentence of the memo Ali O'Neil</p> <p>22 writes, "Pursuant to your request, I have prepared the</p> <p>23 following memorandum documenting a timeline of events."</p> <p>24 Did you receive a request from Senate Majority</p> <p>25 Leader Billig or anyone else to prepare a memorandum?</p>	<p>1 A No.</p> <p>2 Q Did you speak with Ali O'Neil about this memorandum,</p> <p>3 either before or after she prepared it?</p> <p>4 A No.</p> <p>5 Q Okay. Do you know why Ali O'Neil was asked to</p> <p>6 prepare this and not you?</p> <p>7 MS. GOLDMAN: Objection, calls for</p> <p>8 speculation.</p> <p>9 A No.</p> <p>10 Q (By Mr. Thrift-Viveros) Okay. Do you know of any</p> <p>11 reason why Ali O'Neil would have been requested to prepare</p> <p>12 this memorandum?</p> <p>13 MS. GOLDMAN: Objection, calls for</p> <p>14 speculation.</p> <p>15 A No.</p> <p>16 Q (By Mr. Thrift-Viveros) Okay. So yeah, I'm going to</p> <p>17 ask a few questions about this as a guide; and if you</p> <p>18 disagree with anything that -- anything written here, you</p> <p>19 can let me know. That's fine.</p> <p>20 But first off what was your understanding of where</p> <p>21 the negotiations were on the morning of -- the</p> <p>22 negotiations on redistricting were on the morning of</p> <p>23 November 15?</p> <p>24 A On the morning of November 15th I believe that we</p> <p>25 were still in active negotiations.</p>

46 (Pages 181 to 184)

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

Osta Davis

August 19, 2022

Page 185	Page 186
<p>1 Q Okay. In particular, do you know -- or what was</p> <p>2 your understanding of where the negotiations on the</p> <p>3 legislative district in the Yakima Valley region, do you</p> <p>4 know where those negotiations stood on the morning of</p> <p>5 November 15?</p> <p>6 A I don't recall.</p> <p>7 Q Okay. Well, I guess before we go into this memo,</p> <p>8 what's your narrative of what happened on that day of</p> <p>9 November 15?</p> <p>10 A My recollection was that commissioners and some</p> <p>11 staff were meeting in person in Federal Way and engaged in</p> <p>12 discussions and negotiations in an attempt to come up with</p> <p>13 final maps by the deadline.</p> <p>14 Q And what was your role in these negotiations?</p> <p>15 A My role was to staff the negotiations.</p> <p>16 Q So did you -- Were you with Commissioner Sims for</p> <p>17 most of the day?</p> <p>18 A Yes.</p> <p>19 Q All of the day?</p> <p>20 A Most of the day.</p> <p>21 Q Okay. And were you present when Commissioner Sims</p> <p>22 would meet with other commissioners?</p> <p>23 A For the most part, yes.</p> <p>24 Q Okay. In the afternoon, or according to this</p> <p>25 memo -- and again, correct -- feel free to offer a</p>	<p>1 different opinion -- but Ali on the fourth bullet point on</p> <p>2 page No. 2 says, "Throughout the afternoon, offers on the</p> <p>3 legislative district maps were being traded back and forth</p> <p>4 between Commissioner Sims and Graves. It is my</p> <p>5 understanding that these offers were exchanged both via</p> <p>6 text message and in-person meetings."</p> <p>7 Would you say that's correct?</p> <p>8 A I couldn't say for sure what the text messages</p> <p>9 contained, but I do know that there were in-person</p> <p>10 conversations.</p> <p>11 Q Were you present at these conversations?</p> <p>12 A For the most part.</p> <p>13 Q Okay. Do you remember what Commissioner Sims and</p> <p>14 Commissioner Graves discussed in these conversations?</p> <p>15 A Primarily district performance, political</p> <p>16 performance.</p> <p>17 Q Do you recall any specific districts that were,</p> <p>18 quote -- you know, were being traded back and forth</p> <p>19 between the commissioners?</p> <p>20 A The districts that come to mind are districts --</p> <p>21 legislative districts 47 and 28 --</p> <p>22 Q And --</p> <p>23 A -- and 44.</p> <p>24 Q Okay. And what sort of offers were being made</p> <p>25 around those districts?</p>
Page 187	Page 188
<p>1 A There were discussions about what improved</p> <p>2 Democratic performance might look like in those districts,</p> <p>3 and what some of the geography might entail. That's</p> <p>4 primarily the conversation.</p> <p>5 Q Would you consider these offers to be major changes</p> <p>6 between from one offer to the other, or were they more</p> <p>7 tinkering on the edges of districts?</p> <p>8 MS. GOLDMAN: Objection, compound.</p> <p>9 A My recollection of that day was that throughout the</p> <p>10 day the conversations were regarding political</p> <p>11 performance in the narrative sense and didn't necessarily</p> <p>12 include draft maps that accompanied every proposal.</p> <p>13 MR. THRIFT-VIVEROS: Okay. Let me pull up</p> <p>14 another email.</p> <p>15 Q (By Mr. Thrift-Viveros) So in the middle of the day</p> <p>16 at 3:29 you received this email -- or you sent this email.</p> <p>17 I'm sorry.</p> <p>18 THE REPORTER: This will be Exhibit 11.</p> <p>19 MR. THRIFT-VIVEROS: Exhibit 11.</p> <p>20 (Davis Exhibit No. 11 introduced.)</p> <p>21 MR. THRIFT-VIVEROS: And I will represent</p> <p>22 that attached, stapled to this email is a memo, an</p> <p>23 attachment from the email. I'm not sure -- Sorry. I'm</p> <p>24 just putting it into --</p> <p>25 Q (By Mr. Thrift-Viveros) All right. You don't have</p>	<p>1 to look at this whole memo, but I have a few questions.</p> <p>2 So who is --</p> <p>3 So at the bottom email, the first email that was</p> <p>4 sent in this thread was from Chris Kilduff.</p> <p>5 Do you know who Chris Kilduff is?</p> <p>6 A Yes.</p> <p>7 Q Who is he?</p> <p>8 A She --</p> <p>9 Q Or she. Sorry.</p> <p>10 A -- is the Speaker's attorney.</p> <p>11 Q Okay.</p> <p>12 MS. GOLDMAN: So counsel, here I think</p> <p>13 we're going to have to take a break, if you don't mind.</p> <p>14 MR. THRIFT-VIVEROS: That's okay. Yeah.</p> <p>15 MS. GOLDMAN: Was this document produced by</p> <p>16 the State?</p> <p>17 MR. THRIFT-VIVEROS: I believe so, yeah.</p> <p>18 MR. HERRERA: I think so, yes. Let's see.</p> <p>19 MR. THRIFT-VIVEROS: We don't have Bates</p> <p>20 numbers on the documents that are produced.</p> <p>21 MS. FRANKLIN: Did you put this one in the</p> <p>22 Zoom?</p> <p>23 MR. THRIFT-VIVEROS: Yeah.</p> <p>24 Yeah, it was produced by the State.</p> <p>25 Sorry. Are we still on the record?</p>

47 (Pages 185 to 188)

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

Osta Davis

August 19, 2022

Page 189	Page 190
<p>1 THE REPORTER: Yes.</p> <p>2 MR. THRIFT-VIVEROS: Okay. We can take a</p> <p>3 break if you'd like.</p> <p>4 MR. HERRERA: Go off the record.</p> <p>5 THE REPORTER: Do you want to go off the</p> <p>6 record?</p> <p>7 MS. GOLDMAN: I'm going to defer to Erica</p> <p>8 on this issue.</p> <p>9 MS. FRANKLIN: Let's go off the record for</p> <p>10 just a couple minutes.</p> <p>11 MR. THRIFT-VIVEROS: We'll go off the</p> <p>12 record. Thank you.</p> <p>13 (Discussion off the record.)</p> <p>14 (Break 4:10 p.m. to 4:14 p.m.)</p> <p>15 MR. THRIFT-VIVEROS: Let's go back on the</p> <p>16 record.</p> <p>17 MR. HOLT: Deylin, if you don't mind, I</p> <p>18 said something when you were gone, just understanding and</p> <p>19 acknowledging that intervenor-defendants did not</p> <p>20 cross-notice this deposition, the hope is we can still get</p> <p>21 20 to 30 minutes to ask some questions in hopes to avoid</p> <p>22 Ms. Davis having to appear for another deposition for us</p> <p>23 to ask questions.</p> <p>24 So if you can reserve us some time at the end of</p> <p>25 this, we'd appreciate it.</p>	<p>1 MR. THRIFT-VIVEROS: Yeah, I consent to you</p> <p>2 asking some questions. I'll do my best to wrap up to give</p> <p>3 you some time, but no guarantees. I'll do my best,</p> <p>4 though. I don't think there's going to be a whole lot</p> <p>5 more time.</p> <p>6 What is our time at?</p> <p>7 THE REPORTER: 329 minutes.</p> <p>8 MS. GOLDMAN: Five hours and 29 minutes.</p> <p>9 MR. THRIFT-VIVEROS: Okay.</p> <p>10 MR. HOLT: I appreciate that. Thank you.</p> <p>11 MR. THRIFT-VIVEROS: Yes. So -- Sorry.</p> <p>12 MS. FRANKLIN: Counsel, as for this</p> <p>13 document, we are -- The privilege holder is not</p> <p>14 represented here, but we think this looks privileged. So</p> <p>15 we'd ask that we not look at this document and discuss it</p> <p>16 today.</p> <p>17 MR. THRIFT-VIVEROS: So we believe the</p> <p>18 privilege was waived because this was -- I apologize if I</p> <p>19 misspoke before that it was produced by the State, but it</p> <p>20 was produced per a subpoena to the commissioner. So we</p> <p>21 believe the privilege is waived based on that production.</p> <p>22 MS. FRANKLIN: Just one moment.</p> <p>23 MR. THRIFT-VIVEROS: Yeah, that's fine.</p> <p>24 MS. FRANKLIN: I think we would maintain</p> <p>25 our original position and ask that you -- that we not</p>
Page 191	Page 192
<p>1 discuss it in this deposition.</p> <p>2 MR. THRIFT-VIVEROS: It's also our</p> <p>3 understanding that it was produced in response to a public</p> <p>4 records request; but if you'd like, we can --</p> <p>5 I'd like to ask the questions, and you can request</p> <p>6 to seal the questions under a protective order; and we can</p> <p>7 discuss that later, or we can reserve the right to reopen</p> <p>8 the deposition later once we resolve these issues.</p> <p>9 MS. FRANKLIN: I think we would need to</p> <p>10 call the Court if we wanted to continue today with that</p> <p>11 line of questioning.</p> <p>12 MR. THRIFT-VIVEROS: Okay. So would you</p> <p>13 agree that we'd be able to reopen the deposition after we</p> <p>14 resolve these questions of privilege for this memo, or --</p> <p>15 MS. FRANKLIN: Yes.</p> <p>16 MR. HERRERA: Rather than call the Court</p> <p>17 right now.</p> <p>18 MS. GOLDMAN: And we represent different</p> <p>19 parties here.</p> <p>20 MR. THRIFT-VIVEROS: Yeah.</p> <p>21 MS. GOLDMAN: The privilege issue is here.</p> <p>22 The witness issue is here, and we'll reserve on the</p> <p>23 question of the witness and how that happens; but it's our</p> <p>24 understanding that this is a privilege that the witness is</p> <p>25 going to be instructed not to answer on because it's being</p>	<p>1 asserted by the entity that owns the privilege.</p> <p>2 MR. THRIFT-VIVEROS: Okay. And our</p> <p>3 position is that it's not privileged because the privilege</p> <p>4 was waived upon production.</p> <p>5 MS. GOLDMAN: Understood. And obviously</p> <p>6 it's not going to be resolved here, unless you want to</p> <p>7 call Judge Lasnik; and I would highly recommend that you</p> <p>8 not call Judge Lasnik at 4:18 on a Friday afternoon, --</p> <p>9 MR. THRIFT-VIVEROS: Yeah, I was just</p> <p>10 thinking --</p> <p>11 MS. GOLDMAN: -- but I'll leave you to</p> <p>12 that.</p> <p>13 MR. THRIFT-VIVEROS: -- about that.</p> <p>14 MS. FRANKLIN: So provided we do have time</p> <p>15 left, we -- The State is fine with using that time later</p> <p>16 once that issue is resolved.</p> <p>17 MR. THRIFT-VIVEROS: Okay. Thank you.</p> <p>18 So we'll pass on that exhibit, and we can discuss it</p> <p>19 later.</p> <p>20 Q (By Mr. Thrift-Viveros) So if we return to the</p> <p>21 Ali O'Neil memo, --</p> <p>22 MS. GOLDMAN: That's Exhibit 10?</p> <p>23 MR. THRIFT-VIVEROS: Exhibit 10, yes.</p> <p>24 Sorry.</p> <p>25 Q (By Mr. Thrift-Viveros) So on the second bullet</p>

48 (Pages 189 to 192)

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

Osta Davis

August 19, 2022

Page 193	Page 194
<p>1 point on page 3 Ali O'Neil writes that the SDC and the HDC</p> <p>2 staff were grouped together in a room.</p> <p>3 MS. GOLDMAN: I'm sorry, I thought you said</p> <p>4 page 3.</p> <p>5 MR. THRIFT-VIVEROS: Yes.</p> <p>6 MS. GOLDMAN: And what bullet number?</p> <p>7 MR. THRIFT-VIVEROS: The second bullet</p> <p>8 point.</p> <p>9 MS. GOLDMAN: Oh, my apologies. Go right</p> <p>10 ahead.</p> <p>11 Q (By Mr. Thrift-Viveros) The SDC and HDC staff were</p> <p>12 grouped together in a room, giving offers to the other</p> <p>13 side.</p> <p>14 And then in the third bullet point, that offers were</p> <p>15 being traded back and forth between Commissioner Graves</p> <p>16 and Commissioner Sims and then relayed to Ali O'Neil and</p> <p>17 Commissioner Walkinshaw.</p> <p>18 Would you call this an accurate characterization of</p> <p>19 those hours of around 6:00 until 7:30?</p> <p>20 A More or less. As HDC staff -- my sense is that's</p> <p>21 referring to me -- and I personally was not working on a</p> <p>22 statement for leadership or the commissioners.</p> <p>23 Q Okay. Do you know if anyone else was working on</p> <p>24 statements for leadership and the commissioners if no maps</p> <p>25 were approved?</p>	<p>1 A Potentially Dominique Meyers and Ali O'Neil were, --</p> <p>2 Q Okay.</p> <p>3 A -- though I wouldn't know 100 percent.</p> <p>4 Q Were you present in that room on the second floor of</p> <p>5 the Hampton Inn?</p> <p>6 A Yes.</p> <p>7 Q Okay. Were you present at the conversations between</p> <p>8 Commissioner Graves and Commissioner Sims between 6:30 and</p> <p>9 7:30?</p> <p>10 A No.</p> <p>11 Q Okay. Is it your understanding that around that</p> <p>12 time for about an hour Commissioner Graves and</p> <p>13 Commissioner Sims were meeting and making offers back and</p> <p>14 forth?</p> <p>15 A That's my recollection.</p> <p>16 Q Did you -- So in the next sentence Ali O'Neil</p> <p>17 writes, "They were being relayed to me and</p> <p>18 Commissioner Walkinshaw in person."</p> <p>19 Do you know who was -- Were you receiving those</p> <p>20 offers in person? Were those -- Sorry.</p> <p>21 Were those offers being relayed to you as well?</p> <p>22 A Yes.</p> <p>23 Q Okay. Do you recall any specifics about these</p> <p>24 offers?</p> <p>25 A My recollection is that they were in regards to just</p>
Page 195	Page 196
<p>1 a very few districts. My understanding was that it</p> <p>2 included legislative district numbers 28, 47, and 44.</p> <p>3 Q Okay. And is Ali O'Neil's statement that there were</p> <p>4 no maps associated, or she "did not see any maps</p> <p>5 associated with these proposals, and to my knowledge</p> <p>6 neither did Commissioner Walkinshaw," did you see any maps</p> <p>7 associated about those proposals?</p> <p>8 A I guess I would say that leading up to this day we</p> <p>9 had seen a number of proposals, and my implicit assumption</p> <p>10 at the time was that the proposals would have been roughly</p> <p>11 the maps that we had exchanged previously, but for some</p> <p>12 slight tweaks in those three districts.</p> <p>13 Q Okay. As far as you know were there any discussions</p> <p>14 or proposals made regarding the Yakima Valley region</p> <p>15 districts?</p> <p>16 A I believe that at that time there was agreement</p> <p>17 regarding the Yakima Valley district.</p> <p>18 Q Okay. And as you understand was that agreement what</p> <p>19 ended up in the final map?</p> <p>20 A Yes.</p> <p>21 Q Okay. Later in bullet point four Ali O'Neil writes,</p> <p>22 "Dominique Meyers was encouraging Commissioner Sims not to</p> <p>23 accept the deals that were being offered at this time.</p> <p>24 Commissioner Sims agreed."</p> <p>25 Would you agree with that characterization, or were</p>	<p>1 you present at that conversation?</p> <p>2 MS. GOLDMAN: Objection, compound.</p> <p>3 A I believe that I was present at that conversation,</p> <p>4 and I recall receiving proposals that Commissioner Sims</p> <p>5 did not accept.</p> <p>6 Q (By Mr. Thrift-Viveros) And were those proposals</p> <p>7 regarding those specific districts that you mentioned</p> <p>8 before, 47, 44 and 58?</p> <p>9 A Twenty-eight.</p> <p>10 Q Oh, 28. Sorry.</p> <p>11 A There's only 49 districts.</p> <p>12 Q That was my fault. It's a long day.</p> <p>13 But yeah, is that your understanding was those</p> <p>14 proposals that Dominique Meyers was encouraging</p> <p>15 Commissioner Sims to reject regarding those three</p> <p>16 districts only?</p> <p>17 A That was my recollection, that it was those three</p> <p>18 districts. I don't have perfect memory of that day, but</p> <p>19 my understanding is it was just those three.</p> <p>20 Q Okay. Sorry. Just give me one second here.</p> <p>21 Okay. And then on the next page, page 4, bullet</p> <p>22 point two, Ali O'Neil writes, "At around 8:45 p.m. I heard</p> <p>23 Commissioners Walkinshaw and Sims say they agreed to a</p> <p>24 deal with the Republican commissioners that was based</p> <p>25 almost solely on partisanship numbers in a few legislative</p>

49 (Pages 193 to 196)

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

Osta Davis

August 19, 2022

Page 197	Page 198
<p>1 districts."</p> <p>2 Do you recall hearing about this deal with the</p> <p>3 Republican commissioners based almost solely on</p> <p>4 partisanship numbers?</p> <p>5 A I would disagree with that characterization in that</p> <p>6 there were weeks and months of negotiations leading up to</p> <p>7 that point; and so while the partisanship number of very</p> <p>8 few districts was in consideration, there were certainly</p> <p>9 many other points that had already been discussed and were</p> <p>10 implicitly assumed to be a part of the agreement.</p> <p>11 Q Can you tell me what partisanship numbers means?</p> <p>12 A That -- My understanding is that was political</p> <p>13 performance specifically as it related to the State</p> <p>14 Treasurer's race.</p> <p>15 Q Okay. And this agreement, do you know which</p> <p>16 legislative districts it involved?</p> <p>17 A Again, my understanding was that it included</p> <p>18 legislative districts 44, 47 and 28.</p> <p>19 MR. THRIFT-VIVEROS: Okay. I have another</p> <p>20 email here on that day, November 15th at 11:00 p.m. We'll</p> <p>21 mark it as Exhibit --</p> <p>22 THE REPORTER: This is No. 12.</p> <p>23 MR. THRIFT-VIVEROS: -- No. 12.</p> <p>24 (Davis Exhibit No. 12 introduced.)</p> <p>25 MR. THRIFT-VIVEROS: There's no attorneys</p>	<p>1 involved in this email.</p> <p>2 So yeah, let me open it in the chat, and then I'll</p> <p>3 screen share so we can take a look at the map together.</p> <p>4 (Document displayed.)</p> <p>5 MR. THRIFT-VIVEROS: Were you laughing at</p> <p>6 the title?</p> <p>7 MS. GOLDMAN: Yes.</p> <p>8 MR. THRIFT-VIVEROS: The title of this map,</p> <p>9 as everyone can see, is Copy of Copy of Copy of R Prop</p> <p>10 Rebalanced.</p> <p>11 Q (By Mr. Thrift-Viveros) So in this email at</p> <p>12 10:48 p.m. you sent to Ali O'Neil, and you said in your</p> <p>13 email -- Or did you send this email?</p> <p>14 A Yes.</p> <p>15 Q Do you remember sending this email?</p> <p>16 A Yes.</p> <p>17 Q Okay. And you wrote, "Here's the R version of the</p> <p>18 plan map." Does R refer to Republican?</p> <p>19 A Yes.</p> <p>20 Q Okay. And then you wrote, "We need to go through</p> <p>21 and find out what things we don't like about it."</p> <p>22 Do you recall what things you found that you didn't</p> <p>23 like about it?</p> <p>24 A I recall some of the things we didn't like.</p> <p>25 Q And what were those?</p>
Page 199	Page 200
<p>1 A I recall that in east King County they had displaced</p> <p>2 Representative Roger Goodman from his district.</p> <p>3 Q Okay.</p> <p>4 A And there may have been others, but that's the main</p> <p>5 thing that comes to mind.</p> <p>6 Q So I'm going to open this map here.</p> <p>7 (Document displayed.)</p> <p>8 Q And as always, we go back to the Yakima Valley</p> <p>9 region.</p> <p>10 MS. GOLDMAN: And again, would you mind</p> <p>11 scrolling up so we can see all of that, --</p> <p>12 MR. THRIFT-VIVEROS: Yes.</p> <p>13 MS. GOLDMAN: -- 14?</p> <p>14 Q (By Mr. Thrift-Viveros) But mainly I just wanted --</p> <p>15 MS. GOLDMAN: Thank you.</p> <p>16 Q (By Mr. Thrift-Viveros) -- to go back to something</p> <p>17 you mentioned before in the context of the negotiations</p> <p>18 that there was essentially agreement already on the</p> <p>19 legislative districts in the Yakima Valley region; is that</p> <p>20 correct?</p> <p>21 A That was my understanding.</p> <p>22 Q Okay. Do you know whose district between</p> <p>23 Commissioner Sims or Commissioner Graves or otherwise was</p> <p>24 chosen as the final district?</p> <p>25 MS. GOLDMAN: You mean map?</p>	<p>1 MR. THRIFT-VIVEROS: Well, district in</p> <p>2 regards to the district in the Yakima Valley region.</p> <p>3 MS. GOLDMAN: Objection, vague.</p> <p>4 A My recollection is that the district pretty closely</p> <p>5 resembled a recent district that Commissioner Graves had</p> <p>6 sent us.</p> <p>7 Q (By Mr. Thrift-Viveros) Okay. And I don't want to</p> <p>8 have to go through all the overlays and stuff, but I want</p> <p>9 to take a look just really quickly. This is the City of</p> <p>10 Yakima here where my cursor is.</p> <p>11 And would you agree that in this map, which was</p> <p>12 essentially the final map for this district as you</p> <p>13 mentioned, that Yakima City is broken into multiple</p> <p>14 districts?</p> <p>15 A Yes.</p> <p>16 Q Did you have any concerns about splitting Yakima</p> <p>17 City into multiple districts?</p> <p>18 A I guess I'm uncertain of the total population of the</p> <p>19 City of Yakima and whether it would be possible to include</p> <p>20 it wholly within one district.</p> <p>21 Q Okay. Did Commissioner Sims ever express any</p> <p>22 concerns about splitting Yakima City into multiple</p> <p>23 districts?</p> <p>24 A Not that I recall.</p> <p>25 Q Okay.</p>

50 (Pages 197 to 200)

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

Osta Davis

August 19, 2022

Page 201	Page 202
<p>1 (Screen shot taken.)</p> <p>2 MR. THRIFT-VIVEROS: Did you get a screen</p> <p>3 shot?</p> <p>4 THE REPORTER: Yes.</p> <p>5 MR. THRIFT-VIVEROS: Okay. Great.</p> <p>6 Sorry. I'm just checking something.</p> <p>7 Okay. One more email.</p> <p>8 THE REPORTER: This will be Exhibit 13.</p> <p>9 (Davis Exhibit No. 13 introduced.)</p> <p>10 MR. THRIFT-VIVEROS: Let me put it into the</p> <p>11 chat here. So let me put this on screen share.</p> <p>12 (Document displayed.)</p> <p>13 Q (By Mr. Thrift-Viveros) So at 11:22, not long before</p> <p>14 midnight, you sent this email to Commissioner Sims.</p> <p>15 Do you remember sending this email?</p> <p>16 A Yes.</p> <p>17 Q Okay. Were you in the same room with Commissioner</p> <p>18 Sims at the time, or do you remember?</p> <p>19 A I don't recall.</p> <p>20 Q Okay. In the time leading up to you sending this</p> <p>21 email had you been working on maps for the most part?</p> <p>22 MS. GOLDMAN: Objection, vague.</p> <p>23 A Yes.</p> <p>24 Q (By Mr. Thrift-Viveros) Okay. So I'm going to open</p> <p>25 the redistricting link here. This map is titled Copy of</p>	<p>1 Copy of 11/14 7:30 Merged D map.</p> <p>2 So if we look at this map that was attached to this</p> <p>3 email that you sent, it says, "Look at this map" in all</p> <p>4 caps, it shows District 15 with a Hispanic CVAP in 2019 of</p> <p>5 49.2 percent; is that correct?</p> <p>6 A That's what I'm seeing now.</p> <p>7 Q Okay. Just hold on one sec.</p> <p>8 Did you prepare this map; do you recall?</p> <p>9 MS. GOLDMAN: So Counsel, all of a sudden</p> <p>10 --</p> <p>11 MR. THRIFT-VIVEROS: Oh, sorry.</p> <p>12 MS. GOLDMAN: -- we just got truncated, and</p> <p>13 we're only seeing a piece of it.</p> <p>14 MR. THRIFT-VIVEROS: Oh, there.</p> <p>15 MS. GOLDMAN: There we go. Thank you.</p> <p>16 MR. THRIFT-VIVEROS: Yeah, I'm sorry about</p> <p>17 that.</p> <p>18 Q (By Mr. Thrift-Viveros) Do you recall preparing this</p> <p>19 map?</p> <p>20 MS. GOLDMAN: And I'm going to object to</p> <p>21 this map on the grounds of authenticity, as we have seen</p> <p>22 that multiple maps already that were saved were changed.</p> <p>23 So on those grounds I object.</p> <p>24 A I recall assisting in the drafting of this map.</p> <p>25 Q (By Mr. Thrift-Viveros) Okay. Who did you assist</p>
Page 203	Page 204
<p>1 drafting the map?</p> <p>2 A My recollection is that both Dominique Meyers and</p> <p>3 myself helped draft this map.</p> <p>4 Q Okay. Was it your intention that this District 15</p> <p>5 had a Hispanic CVAP of 49.2 percent, less than 50 percent?</p> <p>6 A No, I don't recall that being the case.</p> <p>7 Q Okay. Did Anton Grose participate in the creation</p> <p>8 of this map; do you recall?</p> <p>9 A No.</p> <p>10 Q Okay.</p> <p>11 MR. THRIFT-VIVEROS: Do you want to get a</p> <p>12 screen shot before I close it?</p> <p>13 THE REPORTER: Yes. I was just waiting for</p> <p>14 you to pause a second. Thank you.</p> <p>15 (Screen shot taken.)</p> <p>16 Q So you sent this map to Commissioner Sims at 11:22.</p> <p>17 Did she respond to this map to you?</p> <p>18 A I do not recall.</p> <p>19 Q Okay. So I'm going to stop screen sharing that map.</p> <p>20 All right. So on page 5 of this memo, throughout</p> <p>21 this memo Ali O'Neil is kind of describing some</p> <p>22 conversations she had with different people; and on</p> <p>23 page 5, the last bullet point before Tuesday,</p> <p>24 November 16th, she mentions that the commissioners were</p> <p>25 voting to approve on an agreement that was not restated</p>	<p>1 nor written down anywhere.</p> <p>2 Is that your understanding of what happened at</p> <p>3 midnight?</p> <p>4 A I guess I don't understand what restated means.</p> <p>5 Q Okay. Do you know what agreement the commissioners</p> <p>6 voted on at around midnight?</p> <p>7 A Yes.</p> <p>8 Q What was that agreement?</p> <p>9 A It was an agreement that again incorporated weeks of</p> <p>10 negotiations and had come down to the performance in three</p> <p>11 legislative districts.</p> <p>12 Q Is it your understanding that there was an agreement</p> <p>13 between the commissioners at the time of that vote?</p> <p>14 A Yes.</p> <p>15 Q On those three legislative districts?</p> <p>16 A On the full map.</p> <p>17 Q On the full map? Okay.</p> <p>18 So further on page 6 in bullet point -- one, two,</p> <p>19 three, four, five, six, seven -- eight, Ali O'Neil writes,</p> <p>20 "During this time," which is presumably after 1:00 a.m. or</p> <p>21 so on November 16th, "During this time Anton Grose and</p> <p>22 Osta Davis were working together on the same laptop to</p> <p>23 reconcile the two legislative map proposals."</p> <p>24 Do you recall -- Is that correct?</p> <p>25 A That sentence is correct.</p>

51 (Pages 201 to 204)

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

Osta Davis

August 19, 2022

Page 205	Page 206
<p>1 Q Okay. Then the next sentence or the two sentences</p> <p>2 later she wrote, "They were making decisions about which</p> <p>3 of the two proposals' lines they would adopt as they were</p> <p>4 going through the map."</p> <p>5 Would you characterize that as correct?</p> <p>6 A In part. I would say that some of those decisions</p> <p>7 had been made before that time, and we were adjusting the</p> <p>8 map to reflect the decisions that had been made prior to</p> <p>9 that time.</p> <p>10 Q Did you make any decisions in these final</p> <p>11 legislative district maps that had not been decided ahead</p> <p>12 of time?</p> <p>13 MS. GOLDMAN: Objection, vague.</p> <p>14 A We were working on reconciling the maps, and in</p> <p>15 doing so that necessarily required some adjustments.</p> <p>16 Q (By Mr. Thrift-Viveros) Were you consulting</p> <p>17 Commissioner Sims at this time?</p> <p>18 A Commissioner Sims, yes, was consulted.</p> <p>19 Q And she approved of the changes you were making?</p> <p>20 A Anton Grose and I were making these changes in a</p> <p>21 very public area where anyone could walk and see the</p> <p>22 reconciliation process occur.</p> <p>23 Q Okay. On page 8 -- and right now in the narrative</p> <p>24 we are in the morning of November 16th, and Ali O'Neil</p> <p>25 writes that she dropped Commissioner Walkinshaw off at his</p>	<p>1 house. She returned home, and during the day she had</p> <p>2 received no calls or emails from other commissioners or</p> <p>3 staff regarding the final review of the legislative map</p> <p>4 file. "Commissioner Walkinshaw told me he did not receive</p> <p>5 any calls or emails, either."</p> <p>6 Did you send legislative maps to either Ali O'Neil</p> <p>7 or Commissioner Walkinshaw?</p> <p>8 MS. GOLDMAN: Objection, vague.</p> <p>9 A Sorry. What bullet point?</p> <p>10 Q (By Mr. Thrift-Viveros) Oh, sorry. One, two, three</p> <p>11 four -- five.</p> <p>12 A I do not recall sending emails to Commissioner</p> <p>13 Walkinshaw or Ali O'Neil.</p> <p>14 Q Do you know if Commissioner Sims sent maps, these</p> <p>15 legislative maps to Commissioner Walkinshaw or to</p> <p>16 Ali O'Neil?</p> <p>17 A I am not aware.</p> <p>18 Q Okay. Is there a reason why you didn't send the</p> <p>19 maps to Commissioner Walkinshaw or Ali O'Neil?</p> <p>20 A No.</p> <p>21 Q Okay. Do you know if there was a reason why</p> <p>22 Commissioner Sims did not send these maps --</p> <p>23 MS. GOLDMAN: Object.</p> <p>24 Q (By Mr. Thrift-Viveros) -- as far as you know to</p> <p>25 Commissioner Walkinshaw and Ali O'Neil?</p>
Page 207	Page 208
<p>1 A I can't say if she sent them or not.</p> <p>2 Q Okay. So can you explain what you were doing in the</p> <p>3 time between the morning press conference at 10:00 a.m.</p> <p>4 that's described in bullet point two -- or one, sorry --</p> <p>5 and the transmittal of the maps to the Supreme Court by</p> <p>6 Lisa McLean?</p> <p>7 A My recollection is that they canceled the 10:00 a.m.</p> <p>8 press conference.</p> <p>9 Q Okay. And so what were you doing throughout the day</p> <p>10 before the transmittal of the final maps?</p> <p>11 A I was -- In the morning I was in the main conference</p> <p>12 room area with staff and commissioners, and then later in</p> <p>13 the day Anton Grose, Paul Campos and I were in a room</p> <p>14 making final reconciliations and uploading the map to the</p> <p>15 Edge software.</p> <p>16 Q And then once that was completed who did you send it</p> <p>17 to? Did you send it to someone, or do you know if Anton</p> <p>18 Grose or Paul Campos sent it to someone?</p> <p>19 A My recollection is that either Paul or Anton sent</p> <p>20 the Edge file to Justin Bennett.</p> <p>21 Q And then your understanding is Justin Bennett</p> <p>22 finalized the maps?</p> <p>23 MS. GOLDMAN: Objection, vague.</p> <p>24 A My understanding is that Justin Bennett uploaded the</p> <p>25 maps and verified that the file was correct.</p>	<p>1 Q (By Mr. Thrift-Viveros) Okay. So I just have a few</p> <p>2 more questions. Did you run any analyses on the final map</p> <p>3 that was submitted to the Washington Supreme Court?</p> <p>4 A Yes.</p> <p>5 Q What analyses was that -- were that?</p> <p>6 A I remember looking at political performance as it</p> <p>7 related to the legislative districts in that map.</p> <p>8 Q Using the 2020 treasurer race?</p> <p>9 A Yes, as well as I believe the 2020 presidential</p> <p>10 race.</p> <p>11 Q Okay. Did you run a racially polarized voting</p> <p>12 analysis on the final map?</p> <p>13 A No.</p> <p>14 Q Okay. Do you know if anyone else ran a racially</p> <p>15 polarized voting analysis on the final map before it was</p> <p>16 submitted to the Supreme Court?</p> <p>17 MS. GOLDMAN: Objection, calls for</p> <p>18 speculation.</p> <p>19 A No.</p> <p>20 Q (By Mr. Thrift-Viveros) Do you know why the City of</p> <p>21 Othello was included in the final map for Legislative</p> <p>22 District 15?</p> <p>23 A No.</p> <p>24 Q Okay. When you were looking to create a majority</p> <p>25 CVAP district did you look at a multicounty district, or</p>

52 (Pages 205 to 208)

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

Osta Davis

August 19, 2022

Page 209	Page 210
<p>1 were you just -- were you looking for a district with</p> <p>2 multiple counties inside of it?</p> <p>3 MS. GOLDMAN: Objection, compound.</p> <p>4 A I guess I don't understand the distinction between</p> <p>5 multi-county and a district with multiple counties within</p> <p>6 it.</p> <p>7 Q (By Mr. Thrift-Viveros) Yeah, that's a -- That was a</p> <p>8 poorly phrased question. Sorry. I'll ask a different</p> <p>9 question.</p> <p>10 Is there a reason why the City of Toppenish was not</p> <p>11 included in the final District 15?</p> <p>12 A Not that I recall.</p> <p>13 Q Okay. Is there a reason why the City of Wapato was</p> <p>14 not included in the final Legislative District 15?</p> <p>15 A Not that I recall.</p> <p>16 Q Okay. Do you recall discussions around whether to</p> <p>17 include the City of Toppenish in Legislative District 15</p> <p>18 or the majority CVAP -- majority Latino CVAP district?</p> <p>19 A No.</p> <p>20 Q Okay. Do you recall any conversations regarding the</p> <p>21 inclusion of the City of Wapato in the majority Latino</p> <p>22 CVAP district?</p> <p>23 A No.</p> <p>24 Q Do you recall any conversations regarding the</p> <p>25 inclusion of the City of Othello in the Hispanic CVAP</p>	<p>1 majority district?</p> <p>2 A No.</p> <p>3 Q Okay. Were you aware -- During the redistricting</p> <p>4 process were you aware that the City of Othello has a</p> <p>5 lower Hispanic turnout rate than the areas of Wapato and</p> <p>6 Toppenish? Sorry, Toppenish.</p> <p>7 A No.</p> <p>8 MR. THRIFT-VIVEROS: I'm going to ask for a</p> <p>9 five-minute break, and then we'll figure out if I have any</p> <p>10 more questions to ask.</p> <p>11 So let's go off the record for five minutes. Thank</p> <p>12 you.</p> <p>13 (Break 4:55 p.m. to 4:58 p.m.)</p> <p>14 MR. THRIFT-VIVEROS: I'm ready.</p> <p>15 Okay. So we're back on the record. I don't have</p> <p>16 any more questions. Thank you, Osta, for the marathon,</p> <p>17 and I appreciate your answering all our questions.</p> <p>18 And so if the intervenor-defendants have questions</p> <p>19 or the State, you can go ahead.</p> <p>20 MS. FRANKLIN: The State does have</p> <p>21 questions. Should we go first, or --</p> <p>22 MR. HOLT: I'm fine with whatever. I've</p> <p>23 got probably 20 or 30 minutes. I'm sure our questions</p> <p>24 will probably cancel each other out in some areas, too.</p> <p>25 MS. FRANKLIN: I'm happy to go.</p>
Page 211	Page 212
<p>1 MR. HOLT: Go for it. Go for it.</p> <p>2 MS. FRANKLIN: I probably have a similar</p> <p>3 timeframe. Okay. So --</p> <p>4 And is this an okay place to stay?</p> <p>5 MR. THRIFT-VIVEROS: We can swap if you</p> <p>6 want.</p> <p>7 (Discussion off the record.)</p> <p>8 E X A M I N A T I O N</p> <p>9 BY MS. FRANKLIN:</p> <p>10 Q Thank you so much for your time. My name is</p> <p>11 Erica Franklin. I am an attorney for the State, and I'll</p> <p>12 try to be quick because I know it's been a long day.</p> <p>13 So I just want to briefly return to something you</p> <p>14 said earlier today. You said that you sometimes played</p> <p>15 around in the Dave's Redistricting App to sort of</p> <p>16 familiarize yourself and out of personal interest.</p> <p>17 Do you remember when approximately that was?</p> <p>18 A I believe that was in the fall of 2020.</p> <p>19 Q Okay. And when do you first recall the issue of a</p> <p>20 majority Hispanic CVAP district in the Yakima Valley first</p> <p>21 arising?</p> <p>22 A I recall noting that around the time when the</p> <p>23 commission was given a briefing on the Voting Rights Act,</p> <p>24 and I recall being familiar or learning more about</p> <p>25 Dr. Barreto's work.</p>	<p>1 Q When you mentioned the commission's briefing, was</p> <p>2 that the briefing by the Attorney General's Office in the</p> <p>3 open public meeting?</p> <p>4 A Yes.</p> <p>5 Q Okay. Did you think it was necessary to create a</p> <p>6 district that performs for Latino voters in the Yakima</p> <p>7 Valley?</p> <p>8 MS. GOLDMAN: Objection, calls for a legal</p> <p>9 conclusion.</p> <p>10 A My sense and my own personal opinion was that the</p> <p>11 pre-conditions, including racially polarized voting,</p> <p>12 existed in that region, yes.</p> <p>13 Q (By Ms. Franklin) And what was your personal -- What</p> <p>14 was your opinion based on, without sharing any advice of</p> <p>15 counsel?</p> <p>16 A My awareness of racially polarized voting came from</p> <p>17 some awareness of city and county council -- or county</p> <p>18 commission cases where racially polarized voting had</p> <p>19 occurred and that there were lawsuits that had been in my</p> <p>20 understanding settled prior to the Redistricting</p> <p>21 Commission.</p> <p>22 Q Okay. Was there anything else that informed your</p> <p>23 understanding of racially polarized voting in the Yakima</p> <p>24 Valley?</p> <p>25 A I believe that I had come across some work done by</p>

53 (Pages 209 to 212)

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

Osta Davis

August 19, 2022

Page 213	Page 214
<p>1 Dr. Barreto that pointed to that as well.</p> <p>2 Q Anything else?</p> <p>3 A No.</p> <p>4 Q And did you share your views as to racially</p> <p>5 polarized voting in the Yakima Valley with the</p> <p>6 commissioners?</p> <p>7 A Yes.</p> <p>8 Q April Sims?</p> <p>9 A Yes.</p> <p>10 Q And what about other commissioners?</p> <p>11 A No, I don't recall that I did.</p> <p>12 Q And did you share those views with commission</p> <p>13 staffers?</p> <p>14 A I don't recall doing that.</p> <p>15 Q And when you said you shared them with</p> <p>16 Commissioner Sims, in what manner, verbally or in writing?</p> <p>17 A My recollection is that I had sent an email</p> <p>18 containing work that Dr. Barreto had done previously that</p> <p>19 pointed to that being the case.</p> <p>20 Q Okay. And I think that actually segues into my next</p> <p>21 exhibit.</p> <p>22 MS. FRANKLIN: And I apologize, I forgot</p> <p>23 which number we're on.</p> <p>24 THE REPORTER: We're on 14.</p> <p>25 (Davis Exhibit No. 14 introduced.)</p>	<p>1 Q (By Ms. Franklin) Do you recognize this email?</p> <p>2 A Yes.</p> <p>3 Q And is this an email you sent on March 25th, "2001"</p> <p>4 to Commissioner Sims?</p> <p>5 A Yes.</p> <p>6 Q You stated in this email that you were researching</p> <p>7 redistricting stuff. Do you see that?</p> <p>8 A Yes.</p> <p>9 Q And what were you researching? What did you mean by</p> <p>10 that?</p> <p>11 A My recollection was that I was researching</p> <p>12 particularly more analysis regarding redistricting and</p> <p>13 polarized voting.</p> <p>14 Q And at whose direction were you doing that research?</p> <p>15 A I had attended a redistricting conference hosted by</p> <p>16 NCSL, the National Conference on State Legislatures, prior</p> <p>17 to being hired, and one of the presenters worked at the</p> <p>18 lab, MGGG Labs, I believe, that was referenced in that</p> <p>19 first bullet point.</p> <p>20 Q So is that what prompted you to do this general</p> <p>21 research on redistricting?</p> <p>22 A Yes. I'd say that I began being interested and</p> <p>23 looking into that before I was hired and then continued to</p> <p>24 try to stay abreast of the analysis done in Washington</p> <p>25 state.</p>
Page 215	Page 216
<p>1 Q Okay. And what was your thinking at this point in</p> <p>2 time when you sent this email as to why the VRA might</p> <p>3 apply in the Yakima Valley, --</p> <p>4 MS. GOLDMAN: Object --</p> <p>5 Q (By Ms. Franklin) -- or I guess require a majority</p> <p>6 Hispanic CVAP in the Yakima Valley?</p> <p>7 MS. GOLDMAN: Objection, calls for a legal</p> <p>8 conclusion.</p> <p>9 A Can you restate, or can you repeat the question?</p> <p>10 Q (By Ms. Franklin) So I'm just trying to understand</p> <p>11 what your thinking was at this point in time. This is</p> <p>12 back in March.</p> <p>13 What was your thinking as to whether the VRA might</p> <p>14 require a majority CVAP, Hispanic CVAP district in the</p> <p>15 Yakima Valley?</p> <p>16 MS. GOLDMAN: Objection, calls for a legal</p> <p>17 conclusion.</p> <p>18 A My understanding through the research seemed to</p> <p>19 indicate and build a strong case for the presence of</p> <p>20 racially polarized voting, and so it was my sense that</p> <p>21 given there was an indication that that existed, that it</p> <p>22 would directly have an impact on the districts we drew at</p> <p>23 the state legislative level.</p> <p>24 Q (By Ms. Franklin) Okay. And why were you sending</p> <p>25 this material to Commissioner Sims?</p>	<p>1 A I believe I was sending it to her in case it was of</p> <p>2 interest to her. From my read of it, that my sense</p> <p>3 reading this email is that I may have sent this following</p> <p>4 a meeting with Congresswoman Jayapal, and that may have</p> <p>5 sparked a conversation about redistricting as it relates</p> <p>6 to a majority Hispanic district.</p> <p>7 Q And can you tell me more about that meeting with</p> <p>8 Congresswoman Jayapal, please?</p> <p>9 A I remember meeting with Congresswoman Jayapal and</p> <p>10 Commissioner Sims to discuss redistricting broadly.</p> <p>11 Q And who initiated that meeting?</p> <p>12 A I believe both my team and Congresswoman Jayapal's</p> <p>13 team coordinated in terms of the scheduling. I believe it</p> <p>14 was following a congressional delegation meeting where</p> <p>15 there was an agreement that the commissioners would meet</p> <p>16 with members of congress, Democratic members of congress.</p> <p>17 Q Okay. And do you remember what was said at that</p> <p>18 meeting?</p> <p>19 A Not in its entirety.</p> <p>20 Q Okay. So going back to this email, in bullet one</p> <p>21 you talk about a report that OneAmerica commissioned.</p> <p>22 Do you see that?</p> <p>23 A Yes.</p> <p>24 Q And you said that, "OneAmerica could build a pretty</p> <p>25 strong case for a majority Latinx district in eastern</p>

54 (Pages 213 to 216)

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

Osta Davis

August 19, 2022

Page 217	Page 218
<p>1 Washington."</p> <p>2 What was the basis for that statement?</p> <p>3 A The basis was my understanding that OneAmerica had</p> <p>4 been very active in terms of voter registration, candidate</p> <p>5 support, and work on the specifically city council races</p> <p>6 out there and had a deep connection to the Yakima Valley</p> <p>7 region.</p> <p>8 Q Okay.</p> <p>9 MS. FRANKLIN: And now I'd like to turn to</p> <p>10 the next exhibit. So this will be Exhibit 15.</p> <p>11 (Davis Exhibit No. 15 introduced.)</p> <p>12 MR. HERRERA: Thank you.</p> <p>13 MR. THRIFT-VIVEROS: Thank you.</p> <p>14 Q (By Ms. Franklin) So I will just represent to you</p> <p>15 that this is the report that comes up when you click the</p> <p>16 link in part one of the email we were just looking at</p> <p>17 where you refer to the MGGG report.</p> <p>18 Do you recognize this report?</p> <p>19 A Yes.</p> <p>20 Q And what do you know about who published this</p> <p>21 report?</p> <p>22 A My understanding is that this report came to my</p> <p>23 attention after attending a conference session with</p> <p>24 Professor Moon Duchin.</p> <p>25 (Court reporter request for clarification.)</p>	<p>1 THE WITNESS: First name Moon, M-O-O-N,</p> <p>2 last name Duchin, D-U-C-H-I-N, who I believe is involved</p> <p>3 with MGGG Labs.</p> <p>4 Q And what do you know about why this report was</p> <p>5 commissioned?</p> <p>6 MS. GOLDMAN: Objection, calls for</p> <p>7 speculation.</p> <p>8 A I do not know much about why it was commissioned.</p> <p>9 Q (By Ms. Franklin) Okay. That's fair.</p> <p>10 Starting in the middle of the third paragraph it</p> <p>11 says, "We find that Yakima has a clear pattern of racial</p> <p>12 polarization, with strong Gingles 2 and 3 findings. In</p> <p>13 particular, we find strong cohesion between Hispanic and</p> <p>14 Native voters in their support of Hispanic candidates,</p> <p>15 while white voters block these candidates of choice for</p> <p>16 the minority coalition from ever reaching office."</p> <p>17 Do you recall this conclusion?</p> <p>18 A Yes.</p> <p>19 Q And did it mean anything to you at the time?</p> <p>20 A Yes.</p> <p>21 Q What was the significance for you?</p> <p>22 A Certainly there was significance about the presence</p> <p>23 of racially polarized voting as it related to county</p> <p>24 commission races, and my sense is that likely would have</p> <p>25 carried over to legislative and congressional races.</p>
Page 219	Page 220
<p>1 One question that I believe was posed during the</p> <p>2 Voting Rights Act briefing was the concept of coalition</p> <p>3 districts and wanting more clarity or understanding of</p> <p>4 what a coalition Voting Rights Act district would look</p> <p>5 like.</p> <p>6 Q Okay. And why did you think it was important for</p> <p>7 Commissioner -- I guess first did you think it was</p> <p>8 important for Commissioner Sims to be aware of this</p> <p>9 report?</p> <p>10 A Yes.</p> <p>11 Q Why?</p> <p>12 A I thought it was important and part of my</p> <p>13 responsibility to provide as much relevant information as</p> <p>14 possible to Commissioner Sims.</p> <p>15 Q Okay. Let's go back to Exhibit 14, which is the</p> <p>16 email you sent to Commissioner Sims in March.</p> <p>17 So in the bullet two you mention Matt Barreto. Do</p> <p>18 you see that?</p> <p>19 A Yes.</p> <p>20 Q And why did you raise Dr. Barreto with</p> <p>21 Commissioner Sims at this point in time?</p> <p>22 A I believe that I had just through my own research</p> <p>23 come across the work that he had done in Washington state,</p> <p>24 and that seemed directly applicable to the work that the</p> <p>25 Redistricting Commission would engage in.</p>	<p>1 Q Okay. And you said, "I might put it on Sarah's</p> <p>2 radar if it makes sense."</p> <p>3 Were you referring there to Sarah Augustine?</p> <p>4 A Yes.</p> <p>5 Q And did you end up raising it with her?</p> <p>6 A Yes.</p> <p>7 Q And what was the upshot of that?</p> <p>8 A My understanding, though I do not completely recall</p> <p>9 the timeline of events, but my recollection is that</p> <p>10 Commissioner Augustine may have floated the idea of the</p> <p>11 nonpartisan commission retaining Dr. Barreto at some</p> <p>12 point.</p> <p>13 Q Okay.</p> <p>14 MS. FRANKLIN: And let's move to the next</p> <p>15 exhibit. This will be Exhibit 16; right?</p> <p>16 THE REPORTER: Yes.</p> <p>17 (Davis Exhibit No. 16 introduced.)</p> <p>18 Q Are you aware that this is the report that comes up</p> <p>19 when you put the link in the second part of the email we</p> <p>20 were just looking at?</p> <p>21 A Yes.</p> <p>22 Q All right. So this looks like the date on this</p> <p>23 document is February 6, 2013; is that correct?</p> <p>24 MS. GOLDMAN: Objection. The document</p> <p>25 speaks for itself. Calls for speculation.</p>

55 (Pages 217 to 220)

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

Osta Davis

August 19, 2022

Page 221	Page 222
<p>1 Q (By Ms. Franklin) At the time you were --</p> <p>2 MS. FRANKLIN: I'll just move on.</p> <p>3 Q (By Ms. Franklin) At the time you were -- Actually,</p> <p>4 strike that.</p> <p>5 Are you aware of why Dr. Barreto did this analysis?</p> <p>6 MS. GOLDMAN: Objection, calls for</p> <p>7 speculation.</p> <p>8 A No, I'm not aware.</p> <p>9 Q (By Ms. Franklin) Okay. If you could please turn to</p> <p>10 page 3. What did you understand this slide -- I think,</p> <p>11 actually, hang on. Scratch that. Slide three.</p> <p>12 What did you understand this slide --</p> <p>13 MS. GOLDMAN: What is slide three? Oh, on</p> <p>14 the second page, you mean?</p> <p>15 MS. FRANKLIN: Yeah.</p> <p>16 MS. GOLDMAN: At the top?</p> <p>17 MS. FRANKLIN: Yes.</p> <p>18 Q (By Ms. Franklin) What did you understand this slide</p> <p>19 to mean?</p> <p>20 MS. GOLDMAN: Objection, the document</p> <p>21 speaks for itself.</p> <p>22 A I believe that to mean that there were various</p> <p>23 techniques to calculate the degree of racially polarized</p> <p>24 voting.</p> <p>25 Q (By Ms. Franklin) Okay. And moving on to the slide</p>	<p>1 directly below it, so the second slide on page 2, can you</p> <p>2 explain to me just in your own words how you interpret</p> <p>3 this slide?</p> <p>4 A I interpret the Y axis to be the percentage of the</p> <p>5 vote one and the X axis to be the percentage of the Latino</p> <p>6 population.</p> <p>7 Q Okay. And let's just skip ahead now to page 4. Can</p> <p>8 you tell me what the slides on page 4, how you explain</p> <p>9 those slides?</p> <p>10 A And it's page 4, not slide four?</p> <p>11 Q Yes.</p> <p>12 A Okay.</p> <p>13 Q Sorry to switch back and forth.</p> <p>14 MS. GOLDMAN: I'm going to object that it</p> <p>15 calls for speculation, lack of foundation.</p> <p>16 A My sense, though it's not indicated, is that perhaps</p> <p>17 the size of the dots correlates to population in a unit</p> <p>18 such as a precinct, and on the X axis it shows the</p> <p>19 percentage of the Latino population in that geographic</p> <p>20 unit. Perhaps it could have been in a precinct. As well</p> <p>21 as the Y axis then showing the performance of a candidate,</p> <p>22 though I'm not completely certain which candidate that is,</p> <p>23 or perhaps Farias.</p> <p>24 Q (By Ms. Franklin) Okay. And now just looking at</p> <p>25 this report as a whole, what did you understand to be</p>
Page 223	Page 224
<p>1 Dr. Barreto's ultimate conclusion in your mind?</p> <p>2 (Mr. Herrera left at 5:20 p.m.)</p> <p>3 A My conclusion is or my takeaway was that Dr. Barreto</p> <p>4 had come to the understanding that racially polarized</p> <p>5 voting existed in Washington state.</p> <p>6 Q And did this lead you to believe that there needed</p> <p>7 to be a majority -- majority Hispanic CVAP district in the</p> <p>8 Yakima Valley?</p> <p>9 A I would say it led me to believe that analysis would</p> <p>10 be very useful in making that determination.</p> <p>11 Q Okay. And why did you think it was important for</p> <p>12 Commissioner Sims to be aware of this report?</p> <p>13 A I believed that it would help familiarize her with</p> <p>14 the voting patterns in these areas.</p> <p>15 Q Okay. Any other reasons?</p> <p>16 A At the time I wasn't sure if Dr. Barreto himself may</p> <p>17 be a resource in the process but wanted to bring to her</p> <p>18 attention that he had conducted work here.</p> <p>19 MS. FRANKLIN: Okay. Let's turn to the</p> <p>20 next exhibit, please.</p> <p>21 (Davis Exhibit No. 17 introduced.)</p> <p>22 MS. FRANKLIN: Thank you.</p> <p>23 MR. THRIFT-VIVEROS: Thank you.</p> <p>24 Q (By Ms. Franklin) Do you recognize this document?</p> <p>25 A Yes.</p>	<p>1 Q In the lower email in the thread, did you send this</p> <p>2 email to Sarah Augustine on March 25th, 2021?</p> <p>3 A Yes.</p> <p>4 Q What were you requesting in this email?</p> <p>5 A I do not believe I had a specific request. I</p> <p>6 believe my intention was just to bring this information to</p> <p>7 her radar.</p> <p>8 Q And why were you trying to bring this information to</p> <p>9 her radar?</p> <p>10 A My understanding was that Commissioner Augustine was</p> <p>11 in the process of getting the agency up and running and</p> <p>12 wanted to see what other commissions had done, and I was</p> <p>13 pointing her to some of the work the California</p> <p>14 Redistricting Commission as well as Oklahoma Redistricting</p> <p>15 Commission had done.</p> <p>16 MS. FRANKLIN: Hang on one moment. I</p> <p>17 apologize, I have not been putting these in the chat.</p> <p>18 Maybe I will take a moment and do that, if that would be</p> <p>19 helpful for counsel who are remote.</p> <p>20 MR. HOLT: I'm fine if you just want to</p> <p>21 email them to me afterwards.</p> <p>22 MS. FRANKLIN: Yeah, I can do that. It's</p> <p>23 getting late.</p> <p>24 MR. HOLT: To kind of move things along.</p> <p>25 MS. FRANKLIN: Yeah.</p>

56 (Pages 221 to 224)

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

Osta Davis

August 19, 2022

Page 225	Page 226
<p>1 MR. HOLT: Unless someone else that's</p> <p>2 remote objects to that.</p> <p>3 MS. FRANKLIN: Okay.</p> <p>4 MR. HOLT: Just as long as you mark them to</p> <p>5 which exhibit they were admitted as, that would be</p> <p>6 helpful.</p> <p>7 MS. FRANKLIN: Yes.</p> <p>8 MR. HOLT: You can just title the PDF</p> <p>9 whatever, that's --</p> <p>10 MS. FRANKLIN: Yes, we can do that.</p> <p>11 Just one moment. I apologize, I need to check one</p> <p>12 thing. I just want to grab -- I think I've got exhibits</p> <p>13 mixed up.</p> <p>14 Q (By Ms. Franklin) Okay. Now I'd like to turn to</p> <p>15 Exhibit No. 5. So I'd like to start at the earliest</p> <p>16 email, which is on the first page, and go forward from</p> <p>17 there.</p> <p>18 So when in that email you said it comes in at</p> <p>19 48.2 percent Pellicciotti, why was that important</p> <p>20 information?</p> <p>21 A That was the metric that Commissioners Graves and</p> <p>22 Sims had agreed upon in part of their discussion.</p> <p>23 Q Okay. And then going to the next email on page 2,</p> <p>24 the second page of this document, Kurt Fritts responds,</p> <p>25 "Excellent work," and he asks you a question.</p>	<p>1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q And can you explain what's going on here?</p> <p>4 A Yes. Or what was the -- Can you repeat the</p> <p>5 question?</p> <p>6 Q I just am wondering if you can explain what</p> <p>7 Kurt Fritts is talking about in this email.</p> <p>8 A Kurt Fritts is discussing what metrics to use to</p> <p>9 determine -- most accurately determine the citizen voting</p> <p>10 age population.</p> <p>11 Q Okay. So now I'm going to ask you about the next</p> <p>12 email from November 2nd at 4:14 p.m.</p> <p>13 Do you see that one?</p> <p>14 A Yes.</p> <p>15 Q Can you please explain what you're saying there?</p> <p>16 A My sense is that I am screen shotting what I believe</p> <p>17 is a slide from Dr. Barreto's presentation and sending it</p> <p>18 to Kurt Fritts and April Sims, describing the perceived</p> <p>19 discrepancy between the 2019 ACS data versus what we would</p> <p>20 anticipate the actual Latino citizen voting age population</p> <p>21 to be.</p> <p>22 Q Okay. And what did you mean when said, "Room to</p> <p>23 play with the 14th legislative district LD makeup," what</p> <p>24 did you mean by that?</p> <p>25 A My sense is that -- My sense is that a district that</p>
Page 227	Page 228
<p>1 had 2019 ACS data of citizen voting age population that</p> <p>2 was less than 50 percent would still very likely in census</p> <p>3 terms be above 50 percent.</p> <p>4 Q Okay. Now let's look at the final email from</p> <p>5 November 2nd at 4:50 p.m. So it says, "It would give Paul</p> <p>6 a little more room to get a district that very likely</p> <p>7 stays Republican in the near future, but for our purposes</p> <p>8 it starts us down a path toward a dist that is eventually</p> <p>9 swing."</p> <p>10 (Court reporter request for clarification.)</p> <p>11 MS. FRANKLIN: D-I-S-T that is eventually</p> <p>12 swing.</p> <p>13 Q To your knowledge is Paul a reference to</p> <p>14 Commissioner Graves?</p> <p>15 A Yes.</p> <p>16 Q So was it your understanding that the LD 15 you were</p> <p>17 drawing, even if it leaned Republican, would eventually --</p> <p>18 would in short order swing to the Democrats?</p> <p>19 MS. GOLDMAN: Objection, calls for</p> <p>20 speculation.</p> <p>21 A I don't know if that was my understanding at the</p> <p>22 time.</p> <p>23 Q (By Ms. Franklin) Okay. We can move on to the next</p> <p>24 sentence. Kurt Fritts talks about changes mid decade.</p> <p>25 Was your understanding that this district would</p>	<p>1 become Democratic before it moved to the next round of</p> <p>2 redistricting?</p> <p>3 A My opinion is that the district would likely</p> <p>4 continue to change rapidly as it had done in the past ten</p> <p>5 years, but I don't believe I had a clear understanding of</p> <p>6 the partisan direction of the district.</p> <p>7 Q Okay. Do you recall at any point reviewing</p> <p>8 demographic data about the growth of the Hispanic</p> <p>9 population in this area relative to other races or</p> <p>10 ethnicities?</p> <p>11 A I don't specifically recall that.</p> <p>12 Q Okay. And just a moment. I think I'm almost done.</p> <p>13 Okay. I actually just want to -- I'm sorry to go</p> <p>14 back and forth. I just want to -- I have a couple more</p> <p>15 questions on Exhibit 17, if I could.</p> <p>16 So in the first bullet you said, "One of my</p> <p>17 takeaways in researching Voting Rights Act requirements is</p> <p>18 that compliance will likely require much more</p> <p>19 sophisticated analysis than has happened in the past."</p> <p>20 What did you mean by this?</p> <p>21 A My understanding is that I became aware of more</p> <p>22 sophisticated analytical tools that to my knowledge had</p> <p>23 not been utilized ten years ago with past commissions.</p> <p>24 MS. FRANKLIN: Okay. I don't have any</p> <p>25 further questions for you. Thank you so much for your</p>

57 (Pages 225 to 228)

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

Osta Davis

August 19, 2022

Page 229	Page 230
<p>1 time.</p> <p>2 MS. GOLDMAN: Dallin, will you be asking</p> <p>3 any questions?</p> <p>4 MR. HOLT: Yes. I'm sorry, I didn't</p> <p>5 understand what you just said. Did you turn the time over</p> <p>6 to me?</p> <p>7 MS. FRANKLIN: Yes. I'm sorry if I wasn't</p> <p>8 clear.</p> <p>9 MR. HOLT: Sorry, my apologies.</p> <p>10 Yes, I've got a couple of questions. As far as</p> <p>11 time, I probably have 20 to 30 minutes. I don't know what</p> <p>12 our situation is there.</p> <p>13 MS. GOLDMAN: We have 15 left.</p> <p>14 MR. HOLT: I'll do what I can do, and we'll</p> <p>15 go from there.</p> <p>16 EXAMINATION</p> <p>17 BY MR. HOLT:</p> <p>18 Q Well, good afternoon, Ms. Davis. My name is</p> <p>19 Dallin Holt. I'm an attorney for the intervenor</p> <p>20 defendants in this case. I just want to go back and</p> <p>21 clarify a few things and just ask you a couple questions.</p> <p>22 You mentioned earlier in your deposition that the</p> <p>23 commission took into account partisan performance of</p> <p>24 elections, particularly the 2020 State Treasurer race,</p> <p>25 when negotiating the maps; is that correct?</p>	<p>1 A That's correct.</p> <p>2 Q Okay. And would you agree with the statement that</p> <p>3 the commission cared more about partisanship than race</p> <p>4 when drawing the maps?</p> <p>5 A My sense was that every commissioner had their own</p> <p>6 set of priorities and that the commission as a whole did</p> <p>7 not have a cohesive set of priorities.</p> <p>8 Q Okay. How did Dr. Matt Barreto come to be involved</p> <p>9 in this redistricting process? You mentioned that he was</p> <p>10 contracted with Commissioner Walkinshaw.</p> <p>11 Could you walk me through how that happened?</p> <p>12 A No, in that I believe he was retained by</p> <p>13 Commissioner Walkinshaw while I was on leave.</p> <p>14 Q Okay. So was this in Commissioner Walkinshaw's</p> <p>15 official capacity?</p> <p>16 MS. GOLDMAN: Objection, calls for</p> <p>17 speculation.</p> <p>18 A My understanding is that Commissioner Walkinshaw did</p> <p>19 not use personal funds, so my assumption is that he was</p> <p>20 retained through resources from the Senate Democratic</p> <p>21 Caucus.</p> <p>22 Q (By Mr. Holt) Okay. Was he retained to achieve a</p> <p>23 certain objective?</p> <p>24 MS. GOLDMAN: Objection, calls for</p> <p>25 speculation.</p>
Page 231	Page 232
<p>1 A I have no clue.</p> <p>2 Q (By Mr. Holt) Okay. And would you agree that</p> <p>3 Dr. Barreto was a partisan actor?</p> <p>4 MS. GOLDMAN: Objection, vague.</p> <p>5 A I would agree that Dr. Barreto was retained by a</p> <p>6 commissioner that was appointed by a partisan leader.</p> <p>7 Q (By Mr. Holt) Are you aware of any Republican or</p> <p>8 Republican leaning organization that has ever retained</p> <p>9 Dr. Barreto?</p> <p>10 MS. GOLDMAN: Objection, calls for</p> <p>11 speculation.</p> <p>12 A No.</p> <p>13 Q (By Mr. Holt) Okay. You mentioned a presentation</p> <p>14 that Dr. Barreto provided to the Democratic commissioners</p> <p>15 and their staffs before the maps were first published; is</p> <p>16 that correct?</p> <p>17 A Yes.</p> <p>18 Q Do you know who requested this meeting?</p> <p>19 A My understanding was that the meeting was</p> <p>20 coordinated by Commissioner Walkinshaw's staff.</p> <p>21 Q Okay. Why were the Republican commissioners and</p> <p>22 their staffs not invited to participate in this meeting?</p> <p>23 MS. GOLDMAN: Objection, calls for</p> <p>24 speculation.</p> <p>25 A I can't speak to the decisions made by</p>	<p>1 Commissioner Walkinshaw or his staff in terms of who to</p> <p>2 include.</p> <p>3 Q (By Mr. Holt) Why do you think they weren't invited?</p> <p>4 MS. GOLDMAN: Objection, calls for</p> <p>5 speculation. Lack of foundation. Asked and answered.</p> <p>6 A I couldn't say, though my understanding is that his</p> <p>7 findings were intended to be made public, and the</p> <p>8 Republicans would have access to those materials at that</p> <p>9 time.</p> <p>10 Q (By Mr. Holt) Would you agree with the statement</p> <p>11 that Dr. Barreto was retained to assist the Democratic</p> <p>12 caucus in obtaining a more favorable map for their</p> <p>13 political causes?</p> <p>14 MS. GOLDMAN: Objection, calls for</p> <p>15 speculation, lack of foundation, asked and answered.</p> <p>16 A No.</p> <p>17 Q (By Mr. Holt) Okay. To your knowledge do Hispanics</p> <p>18 tend to vote more for Democrats or Republicans in the</p> <p>19 state of Washington?</p> <p>20 MS. GOLDMAN: Objection, incomplete</p> <p>21 hypothetical.</p> <p>22 A My general understanding is that they tend to vote</p> <p>23 more Democratically.</p> <p>24 Q (By Mr. Holt) Is that same for the Yakima Valley?</p> <p>25 A That is my general understanding.</p>

58 (Pages 229 to 232)

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

Osta Davis

August 19, 2022

Page 233	Page 234
<p>1 Q And have you noticed any shifts in that</p> <p>2 understanding over the last few years, or has it been</p> <p>3 fairly steady to your knowledge?</p> <p>4 MS. GOLDMAN: And Counsel, are you asking</p> <p>5 her for the shift in her understanding or the shift in the</p> <p>6 data?</p> <p>7 MR. HOLT: Shift in the data.</p> <p>8 MS. GOLDMAN: Objection, calls for --</p> <p>9 Q (By Mr. Holt) Go ahead.</p> <p>10 MS. GOLDMAN: Objection, calls for</p> <p>11 speculation, lack of foundation.</p> <p>12 A No, I'm not aware of a shift.</p> <p>13 MR. HOLT: Okay. I'm going to introduce an</p> <p>14 exhibit here. I'll drag it in.</p> <p>15 THE REPORTER: This will be No. 18.</p> <p>16 (Davis Exhibit No. 18 introduced.)</p> <p>17 MR. HOLT: Okay. You all let me know when</p> <p>18 you've got it.</p> <p>19 MS. GOLDMAN: Will you be sharing your</p> <p>20 screen?</p> <p>21 MR. HOLT: I don't believe I need to share</p> <p>22 the screen on this one. Unless it would be easier for me</p> <p>23 to do that, I'm happy to do that.</p> <p>24 MS. GOLDMAN: Well, the witness can't see</p> <p>25 it if you don't do that.</p>	<p>1 MR. HOLT: Okie dokie. Let me figure this</p> <p>2 out then. I've got a lot of windows open here.</p> <p>3 MS. GOLDMAN: You know, Counsel, if it's</p> <p>4 going to take you a while I can open it on mine, and she</p> <p>5 can look on my screen if you don't object.</p> <p>6 MR. HOLT: Just give me one sec. I can --</p> <p>7 Yeah, my preferences aren't allowing me to do it, so</p> <p>8 go right ahead and open it up. Thank you.</p> <p>9 Just let me know when you have it there.</p> <p>10 MS. GOLDMAN: Okay. This is the Order of</p> <p>11 the Supreme Court that was filed December 3rd, 2021;</p> <p>12 correct?</p> <p>13 MR. HOLT: That is correct.</p> <p>14 MS. GOLDMAN: Okay. I have the front page</p> <p>15 open.</p> <p>16 MR. HOLT: Okay.</p> <p>17 Q (By Mr. Holt) Have you seen this before, Ms. Davis?</p> <p>18 A I believe so.</p> <p>19 Q Okay. I'll represent that this is the Order of the</p> <p>20 Supreme Court essentially accepting the maps as passed by</p> <p>21 the commission.</p> <p>22 Is that what you believe this document to be as</p> <p>23 well?</p> <p>24 A Yes.</p> <p>25 Q Okay. If you could turn to page 3.</p>
Page 235	Page 236
<p>1 MS. GOLDMAN: Go ahead.</p> <p>2 Q (By Mr. Holt) In the third sentence of that first</p> <p>3 paragraph starting with Redistricting raises, "I'm going</p> <p>4 to go ahead and read that sentence, and then we'll talk</p> <p>5 about it.</p> <p>6 It says, "Redistricting raises largely political</p> <p>7 questions best addressed in the first instance by</p> <p>8 commissioners appointed by the legislative caucuses where</p> <p>9 negotiation and compromise is necessary for agreement."</p> <p>10 Do you agree with that statement?</p> <p>11 MS. GOLDMAN: Objection, calls for a legal</p> <p>12 conclusion.</p> <p>13 You can answer.</p> <p>14 A Yes.</p> <p>15 Q (By Mr. Holt) Is this process of negotiation and</p> <p>16 compromise one that you witnessed while the maps were</p> <p>17 going through the process in Washington state?</p> <p>18 A Yes.</p> <p>19 Q Give me a few examples. Walk me through what you</p> <p>20 witnessed as far as negotiation and compromise that leads</p> <p>21 you to agree with that statement from the Supreme Court.</p> <p>22 A In my experience I witnessed Commissioner Graves and</p> <p>23 Commissioner Sims both hold strongly held priorities and</p> <p>24 make tradeoffs between which priorities would make it into</p> <p>25 the final maps, including compromises regarding the</p>	<p>1 geography involved in particular districts as well as</p> <p>2 partisan makeup of districts.</p> <p>3 Q Okay. Is it your understanding that the Washington</p> <p>4 Constitution requires partisan competitiveness when</p> <p>5 drawing districts?</p> <p>6 MS. GOLDMAN: Objection, calls for a legal</p> <p>7 conclusion.</p> <p>8 A My understanding is that electoral competitiveness</p> <p>9 is one factor among many that the commissioners must</p> <p>10 consider.</p> <p>11 MR. HOLT: Okay. I'm going to go ahead and</p> <p>12 throw another exhibit in. Counsel, if you won't mind</p> <p>13 opening this up, that would be great.</p> <p>14 THE REPORTER: This will be No. 19.</p> <p>15 MR. HOLT: Okay.</p> <p>16 (Davis Exhibit No. 19 introduced.)</p> <p>17 MR. HOLT: Just let me know when you have</p> <p>18 it. It's Article II, Section 43 of the Washington</p> <p>19 Constitution.</p> <p>20 MS. GOLDMAN: Okay. And I have it open.</p> <p>21 Q (By Mr. Holt) Okay. If you could look at subsection</p> <p>22 five, are you able to read that last sentence there for</p> <p>23 me, Ms. Davis, subsection five of Section 43?</p> <p>24 A "The commission's plan shall not be drawn purposely</p> <p>25 to favor or discriminate against any political party or</p>

59 (Pages 233 to 236)

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

Page 238

1 Q What do you believe it means?
2 MS. GOLDMAN: Objection, asked and
3 answered. She just said she doesn't know what it means.
4 And Counsel, I'll let you know we have a minute
5 left, so you might want to ask your last question.
6 MR. HOLT: Okay. We'll just hold on for
7 another day. We'll just notice another deposition.
8 MS. GOLDMAN: And --
9 MR. HOLT: I have probably about 20 more
10 minutes, but we'll just regroup then.
11 MS. GOLDMAN: Okay. We are at --
12 MR. HOLT: Thank you, Ms. Davis.
13 MS. GOLDMAN: We're at the conclusion, and
14 we will reserve our rights to discuss that. We're
15 certainly not agreeing to that on the record, and we
16 reserve rights to signature. Thank you.
17 Okay. Good evening.
18 MR. HOLT: Thanks.
19 MS. FRANKLIN: Thank you.
20 (Deposition adjourned at 5:50 p.m.)
21 (Signature reserved.)

Page 240

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

6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	

20 Witness: Osta Davis
Soto Palmer, et al. v. Hobbs, et al.
21 USDC Western District of Washington
Cause No. 3:22-cv-05035-RSL
22 Date: August 19, 2022
23 Reported by: Jeanne M. Gersten, RDR, CCR No. 2711
 LAKESIDE REPORTING
24 (833) 365-3376
 Jeanne@LakesideReporting.com
25 Contact@LakesideReporting.com

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



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

Osta Davis

August 19, 2022

Page 241

A	70:1 159:12,22	address 19:20	159:12 160:7	38:18 40:13
a.m 1:17 7:2	166:22 167:23	20:4	163:14 226:10	44:19
52:25,25	182:10 226:19	addressed 235:7	226:20 227:1	aimed 143:1
204:20 207:3,7	227:1	addresses 19:16	agency 36:7	aiming 99:11
ability 12:19	Act 13:24 18:11	178:9	67:16 224:11	aims 151:19
113:12 121:6	21:5,10 31:16	adhere 237:4	agenda 63:18	air 71:21
124:1 129:21	87:8,10,24	adjourned	136:11,16	al 1:3 2:6 240:20
able 50:20 92:25	88:4 89:3,5,18	238:20	agendas 136:4,7	240:20
191:13 236:22	89:20 90:2,10	adjust 58:8,18	agitated 126:25	Alec 94:12,13,22
abreast 214:24	90:18,23 91:8	adjusted 27:11	ago 228:23	97:21
absorbing	91:12,20,23	158:18	agree 11:16	Alex 1:11 95:7
130:19	92:20,23 93:4	adjusting 205:7	138:2 191:13	95:12 96:5,10
accept 195:23	93:10 94:3,9	adjustments	195:25 200:11	96:13,23 97:1
196:5	97:12 106:14	163:15 205:15	230:2 231:2,5	97:4,7,10,15
acceptable	120:18 121:18	administer	232:10 235:10	97:20
128:15	121:22 122:5,8	239:5	235:21	Ali 4:23 5:7,12
accepting	123:3,7 125:9	Administrative	agreed 10:19	54:15 65:20
234:20	126:22 128:10	239:18	74:6,7,24 78:5	97:8 101:14
access 48:3	129:18 150:15	admitted 225:5	78:9,16 79:22	126:3 136:14
232:8	170:13 182:15	adopt 110:20	129:2 138:17	136:15,17
accessibility	182:20 211:23	205:3	179:23 195:24	182:25 183:16
50:18	219:2,4 228:17	adopting 145:15	196:23 225:22	183:21 184:2,5
accompanied	acted 50:5	advertised 42:19	agreeing 137:23	184:11 186:1
187:12	acting 155:24	47:7	238:15	192:21 193:1
accomplish	156:1	advertising 47:9	agreement	193:16 194:1
113:12	action 4:15	advice 92:17	10:21,23,25	194:16 195:3
account 20:5	150:14 172:1	97:21 170:16	74:18 75:2,3	195:21 196:22
159:22 229:23	239:12,13	212:14	78:13,14 80:1	198:12 203:21
accounts 19:5,8	active 34:7,10	advocacy 50:7	80:5,8 82:2	204:19 205:24
accurate 193:18	136:3 184:25	171:4	195:16,18	206:6,13,16,19
240:3	217:4	Affairs 2:16	197:10,15	206:25
accurately 226:9	actively 34:2	27:3,10,12	199:18 203:25	aligned 76:13
accusations	activities 26:23	affect 12:4,19	204:5,8,9,12	Alliance 170:24
125:16,23	actor 231:3	135:23	216:15 235:9	171:2,7,14,17
126:5,14,17	actual 226:20	affiliated 171:25	Aguilar 32:5	171:21
accused 125:15	Adam 5:3 43:12	affirmations	AHarless@ Ca...	allow 88:13
achieve 133:1	43:14,17 54:21	239:5	2:11	121:8 129:21
230:22	54:22,24	afternoon	ahead 152:5	allowing 234:7
achieved 128:17	101:15 126:9	185:24 186:2	193:10 205:11	allows 122:12
acknowledge	170:3,5,9	192:8 229:18	210:19 222:7	altering 159:9
64:20	Adam's 55:1	age 83:13,14	233:9 234:8	alternative
acknowledging	Adams 29:25	84:6 107:18	235:1,4 236:11	11:15
189:19	add 13:16 153:8	121:5 142:3,7	aide 43:2 82:10	ambiguous
ACS 69:2,3,7,10	addenda 45:12	144:16,17	aide's 44:8	163:12
69:15,16,25	additional 44:2	150:18,22	aides 11:7 38:3,5	American 2:21

Osta Davis

August 19, 2022

Page 242

7:14 28:24 67:9 159:13 amount 76:25 143:12 AMulji@Cam... 2:12 Amy 95:14 analyses 73:10 74:2 78:20 84:22 85:2,10 124:5 148:5,8 148:14 149:3 208:2,5 analysis 5:19 32:13,15,16 58:23 59:3 60:5,7 64:21 71:24 79:9,12 79:13,15 85:8 102:10,11 103:9,10,14 107:21,23 120:3,7,8,14 121:16 123:22 123:25 133:22 133:24 134:4 134:11 142:15 142:17 143:15 143:18,22,25 167:21,22,25 168:3,15,19 182:19 208:12 208:15 214:12 214:24 221:5 223:9 228:19 analyst 24:19 27:22 33:16 35:10 38:19 39:9,24 40:10 41:14 43:5,8 43:21 60:20 62:7 95:22,24 analysts 43:18 analytical 228:22	analyze 75:19 78:4 132:22 analyzed 75:17 76:1 91:5 analyzing 41:24 66:19 84:11 173:6 Andrew 3:8 8:11 Andrew.Hugh... 3:12 Andy 5:7 anecdotes 31:4 Angeles 2:16,22 Annabelle 2:8 8:5 annexed 239:6 annual 68:7 annually 68:3 answer 9:8,9,11 9:16,18,21 10:5,5 12:22 13:3,7,12 16:9 18:23 19:24 32:21 91:3 92:5,7 97:22 97:23 103:1 166:15 191:25 235:13 answered 19:23 57:19 81:18,24 83:4 89:21 126:8 146:6 152:4 163:5 232:5,15 238:3 answering 210:17 answers 9:12 11:23 239:16 anticipate 226:20 anticipation 28:13,14 Anton 5:4 43:22 44:10,11,14	65:22 82:13,17 177:4,7 203:7 204:21 205:20 207:13,17,19 Anytime 26:6 apart 154:12 apologies 4:13 175:19 193:9 229:9 apologize 104:17 170:19 177:1 190:18 213:22 224:17 225:11 apologizing 125:6 145:3 app 20:20,21,24 20:25 28:11 39:17 40:2,9 40:18 59:2 60:10 73:4,11 83:12 85:7 211:15 appear 189:22 APPEARAN... 3:1 appended 156:21 161:19 162:9 applicability 120:17 applicable 219:24 application 34:25 applied 35:8 89:20 applies 89:6 apply 35:9 122:8 215:3 appointed 35:15 108:17 231:6 235:8 appreciate 189:25 190:10	210:17 appreciated 119:4 appreciation 119:6 approaches 58:4 appropriate 11:24 182:4 approval 71:15 129:3 137:3 approve 137:20 137:22 203:25 approved 193:25 205:19 approximately 211:17 April 4:10,12,14 4:16,18,20,22 5:2,5,9,15,17 33:21 35:7 175:13 213:8 226:18 239:23 area 30:20 107:18 137:9 140:6,14 147:21 205:21 207:12 228:9 areas 50:23 137:2 138:10 138:14 163:16 182:1,3 210:5 210:24 223:14 arising 211:21 arrangement 81:12,13 82:23 arriving 237:2 Article 5:19 6:5 236:18 Aseem 2:9 8:6 asked 15:13,17 15:21 19:22 50:16 57:18 81:17,23 83:3 89:16,17,19 99:14 103:5	110:20 111:9 126:8 146:5 152:3 163:4 172:22 184:5 232:5,15 238:2 asking 9:2 17:11 89:25 92:18 148:24,24 190:2 229:2 233:4 asks 225:25 asserted 192:1 assertion 128:9 assess 90:15,17 90:22 91:7,10 assessed 112:18 assessment 11:14 123:18 179:23 assessments 71:23 assigned 38:10 43:11 81:1,11 81:16 155:15 167:10,14 assignments 42:23 assist 202:25 232:11 assistant 3:9 8:15 24:10 assisting 202:24 associated 195:4 195:5,7 assume 9:21 assumed 62:12 197:10 assuming 173:12 assumption 62:4 62:14 79:12 130:20 151:24 178:8,12 195:9 230:19 attached 4:15,17
--	--	---	--	--

Osta Davis

August 19, 2022

Page 243

4:19,21,24 5:10,13,15 149:21 152:17 153:16 157:21 165:4 187:22 202:2 attachment 105:8 149:19 149:22 152:11 156:15 161:4 165:8 187:23 attempt 185:12 attempted 126:22 attend 46:2 47:18 48:11 49:2 54:2,7 82:8,11 173:16 attended 46:11 46:21 48:14,16 62:20,21 65:25 66:4 86:23 88:2 90:7 95:22 108:11 110:2 130:17 135:20 170:9 214:15 attendees 63:16 64:25 104:24 attending 66:3 217:23 attention 12:18 217:23 223:18 attorney 1:19 3:10 7:14,23 8:11,15 16:20 21:16 86:17 87:2,3 88:2,3 89:8,9,22,22 90:3 93:21,25 93:25 94:8 97:20 188:10 211:11 212:2 229:19 239:12 239:13	attorney's 94:10 attorneys 3:9 92:24 93:6,18 94:2,4,6 197:25 auditorium 108:24 109:5 August 1:17 7:1 34:16 39:2 55:10 239:20 240:22 Augustine 5:22 44:19,22 45:3 45:10 220:3,10 224:2,10 Augustine's 45:9 authenticate 182:25 authenticity 202:21 authorized 239:4 Autobound 66:5 available 42:19 Avenue 1:19 2:4 3:4,11 average 34:6 53:15 69:8,14 69:21 avoid 189:21 aware 31:1 43:25 44:3,17 117:16 121:14 134:13,17,21 206:17 210:3,4 219:8 220:18 221:5,8 223:12 228:21 231:7 233:12 awareness 212:16,17 axis 222:4,5,18 222:21	B B 4:8 B-A-R-T-Z 43:16 back 15:21 19:4 22:7 33:10,12 33:13 34:23 39:18 47:14,24 53:2,13 55:4 57:23 58:18 60:15 61:14,18 64:12,18,19 70:13,25 71:14 76:16 78:3 81:11 89:18 106:22 110:10 111:8 114:4 118:15 121:22 126:9 130:13 130:14,16 132:21 133:7 134:22 141:9 141:20 142:16 143:8 145:1 146:13,15 154:7 175:21 181:5 182:6 186:3,18 189:15 193:15 194:13 199:8 199:16 210:15 215:12 216:20 219:15 222:13 228:14 229:20 back-and-forth 130:9 bad 165:11 balance 132:20 132:24 133:11 ballot 25:2 Barreto 5:3,21 86:12 89:10,21 90:3 91:4 101:11,14,19 102:5 107:3	119:8,12,12 120:14 121:16 130:18 133:22 134:10,16,20 144:9 149:1 173:10,10,14 175:23 213:1 213:18 219:17 219:20 220:11 221:5 223:3,16 230:8 231:3,5 231:9,14 232:11 Barreto's 103:9 106:13,17 107:7 120:3 123:23 124:11 124:13 148:20 168:4,11,15,21 211:25 223:1 226:17 Bartz 43:12,14 43:18 54:21,22 base 89:2,7,16 89:17 119:16 based 9:11 69:1 76:3 107:2,7 112:20 122:1 136:21 142:5 150:17,22,23 163:18 168:21 179:14 190:21 196:24 197:3 212:14 basically 9:4 23:18 basics 36:13 basing 62:14 89:25 140:20 140:22,24 basis 48:8 49:20 53:6,7 57:4,5 88:17 217:2,3 Bates 149:20 188:19	becoming 126:24 began 37:25 55:21 214:22 beginning 55:24 behalf 2:7,13,19 3:2 8:19 48:19 49:2,5 64:11 belief 119:17 237:11 believe 15:20 17:11 18:4,14 21:25 27:11 31:9 32:7,10 34:16 35:22 38:22 46:16,21 47:10,19 49:8 54:15,24 55:21 55:23,25 60:20 61:8,11 62:2 63:6,14 65:2,9 65:25 67:6,12 70:21,23 71:10 71:18 73:16 74:20 81:3,9 82:25 83:11,12 84:5 85:12 86:17 87:6,9 90:7,12 91:4 92:23 93:5 95:3,16,22 96:8 97:9,13 97:24,24 98:2 98:11,17 99:19 99:25 100:2,13 100:23 101:14 102:12 103:8 106:12 110:14 110:17 111:3 111:18,22 112:9 115:8,13 118:21 119:7 119:15,18 120:5 124:3 125:9 126:9,12
---	--	---	---	--

Osta Davis

August 19, 2022

Page 244

127:19 132:1,2 135:4,11,19 137:1 139:4 140:13,21 144:14 148:16 148:17 154:19 162:24 163:1 165:5 167:15 168:11 169:25 170:23 171:13 172:4 173:18 173:24 176:12 182:18 183:5 184:24 188:17 190:17,21 195:16 196:3 208:9 211:18 212:25 214:18 216:1,12,13 218:2 219:1,22 221:22 223:6,9 224:5,6 226:16 228:5 230:12 233:21 234:18 234:22 238:1 believed 131:5 136:24 223:13 believes 122:11 179:12 Bennett 60:18 60:22 61:10,13 61:14,17,21 62:7,9 64:2,8 64:11 66:4,13 71:12 207:20 207:21,24 Bennett's 64:25 Benton 29:25 BERNADETTE 2:15 Bernadette@... 2:17 best 12:5,7 113:12,13 190:2,3 235:7	240:3 better 11:7 38:2 145:5 180:11 beyond 109:22 121:16 179:8 180:19 Biden 73:21 big 77:9 Billig 5:7 100:21 183:1,25 Biscay 5:22 bit 28:9 33:13 34:22,24 39:19 50:1 57:24 117:20 127:22 130:8 141:10 146:16 163:1 171:1 Black 127:11 block 167:2 218:15 blocs 32:24 33:2 163:15 body 28:1 booklet 11:23 bottom 165:19 165:23 188:3 boundaries 109:20 box 104:12 125:4 Brad 100:13 Brady 4:23 break 9:25,25 52:20,23,25 53:4 71:19 113:21 114:3,7 114:8 146:10 146:12 169:10 188:13 189:3 189:14 210:9 210:13 breaks 10:1 Bridges 4:13 43:12,14,17	54:16 65:25 110:17,22 111:1 114:22 114:25 125:5 125:14 126:3 126:24 128:2 130:22 131:7 134:23 135:15 136:7 145:1,2 145:7,22 Bridges' 126:5 127:2 brief 63:18 briefing 86:16 211:23 212:1,2 219:2 briefly 211:13 bring 26:11 111:19 129:18 147:6 223:17 224:6,8 broad 88:6,8,9 broadly 100:14 216:10 broken 200:13 brought 55:13 bucket 138:19 Budget 5:23 build 215:19 216:24 Building 2:16 bulk 26:24 bullet 167:22 181:6 186:1 192:25 193:6,7 193:14 195:21 196:21 203:23 204:18 206:9 207:4 214:19 216:20 219:17 228:16 Bus 23:22 26:20 Bush 22:11 business 19:17	C C 2:1 239:1,1 calculate 221:23 calendar 45:15 45:16,17,19 48:4 California 2:16 2:22 224:13 call 7:11 173:8 173:17 191:10 191:16 192:7,8 193:18 called 23:21 153:5,7 171:25 calling 139:23 calls 18:22 20:22 21:1 30:3 32:19 40:14 44:2,15 45:5 53:23 55:7 60:23 64:14 68:5 84:23 85:4 88:21 90:24 119:13 120:9 121:12 125:19 126:7 130:25 133:2 133:16 135:19 145:24 147:16 152:4 161:12 174:3 176:2 179:15 182:16 184:7,13 206:2 206:5 208:17 212:8 215:7,16 218:6 220:25 221:6 222:15 227:19 230:16 230:24 231:10 231:23 232:4 232:14 233:8 233:10 235:11 236:6 237:6 camaraderie 135:5	campaign 2:7,9 8:4,5,6 23:15 23:23,23,24 24:2,3 25:1,5,9 25:11,17,19 146:20 campaigns 24:24,24 25:7 25:10,13 146:21 147:5 Campos 1:10 44:9 62:4,13 62:16,24 63:1 65:20 207:13 207:18 cancel 210:24 canceled 207:7 candidate 23:25 50:20 88:14 122:12 133:19 217:4 222:21 222:22 candidates 50:22 73:3,7 76:8 112:24 121:6,9 122:23 123:2,17,19 124:2,6 126:19 129:22 133:25 134:4 218:14 218:15 candidates' 25:13 capacities 146:22 capacity 1:6 28:6,7 35:21 44:25 45:13 54:6 56:17 62:19,22 135:18 155:24 156:1 170:8 230:15 237:20 caps 202:4 carbon 164:19
--	--	---	---	--

Osta Davis

August 19, 2022

Page 245

cared 230:3	160:8,13	changed 99:12	188:4,5	click 160:10
carried 218:25	163:15 227:2	99:13 113:16	Christine 24:14	217:15
carry 147:5	Center 2:7,9 8:4	161:16 202:22	25:3	clicked 157:3
case 15:15 27:5	8:5,6	changes 11:23	circulated 148:9	clients 27:5
31:22,25 32:6	Center.org 2:11	12:3 110:25	cities 72:3 76:18	close 110:8
32:11 75:18	2:12	175:17 187:5	76:18,23 77:1	158:4 203:12
129:18 178:9	Central 28:24	205:19,20	77:4,7,8,12,14	closely 38:10,23
203:6 213:19	100:15	227:24	112:1 139:2,6	54:8 65:3,18
215:19 216:1	certain 33:7	changing 111:6	citizen 84:6	74:21 75:12,16
216:25 229:20	40:16 46:17	177:22 178:5	107:17 142:2	75:22 76:13
cases 31:18	47:5,10 50:11	character 111:4	144:17 150:18	200:4
212:18	50:13 77:7	characteristics	150:22 159:11	closer 63:13
catch 96:4	83:20,23 89:14	99:14	163:14 226:9	clue 231:1
categories	112:22 123:19	characterizati...	226:20 227:1	coalition 49:9,19
131:20	124:1,6 137:1	193:18 195:25	citizens 50:6	50:2,5,6,8,11
categorized	137:1,2 141:2	197:5	city 23:15,23	50:13,24 52:5
131:24	143:12 171:4	characterize	31:9,21,24	52:6 53:5,15
category 38:14	172:14 174:17	56:13 96:23	67:22 77:11	53:18,22 141:1
132:3,9	222:22 230:23	137:21,23	138:25 139:4,8	171:5,15,19
caucus 28:2	certainly 48:9	205:5	141:15 174:19	172:12 173:9
33:18 35:3	77:24 80:22	chat 103:25	175:6 200:9,13	174:14 175:23
42:1 92:4,13	111:25 112:19	104:12,24	200:17,19,22	175:24 176:11
93:25 94:3,14	121:3 123:22	124:20 125:4	208:20 209:10	218:16 219:2,4
95:8,19 98:13	135:6 142:19	149:17,23	209:13,17,21	Coalition's
115:20 116:9	197:8 218:22	161:4 164:13	209:25 210:4	174:2,7
170:4 230:21	238:15	176:19 183:20	212:17 217:5	Code 239:18
232:12	Certified 239:4	198:2 201:11	civic 26:22	cohesion 218:13
caucuses 17:3	certify 239:5,7,9	224:17	35:25	cohesive 33:2,4
38:11 65:16	239:11,14,15	check 225:11	claims 11:5	230:7
235:8	240:2	checking 201:6	clarification	cohesively 32:24
Cause 240:21	cetera 18:16	Chege 5:3	13:15 32:3	collaboration
causes 232:13	chain 62:10	170:19 171:6	217:25 227:10	151:18
cc 164:19	155:9	chief 35:3,5 37:3	clarify 9:20	colleague 8:10
cc'd 177:8	chains 54:9	95:4,6,7,8,13	42:13 57:4	8:12
CCR 1:22	chair 44:22 45:3	96:4	115:24 136:23	college 22:12,14
239:22,23	45:11	choice 50:20,22	142:6 148:23	22:15,16 23:11
240:23	Chair's 6:4	88:14 111:17	165:7 229:21	23:12,19
cellphone 15:22	chance 104:10	121:6,9 122:13	clarity 219:3	color 50:19,22
18:3,6 20:8	104:11 164:15	122:24 123:17	class 85:21	52:8 125:16
census 29:18	chances 101:7	123:20 124:2,7	clear 9:4 10:9	126:1 127:5
34:12,14 36:15	change 113:4,6	126:19 129:22	11:4 20:10	come 36:7 81:13
66:21,23 67:1	163:18 228:4	218:15	48:16 117:10	120:6,8 121:2
67:3 68:21,23	240:5	chose 79:7,8	181:22 182:1	185:12 186:20
69:1,11 159:16	CHANGE/SI...	chosen 199:24	218:11 228:5	204:10 212:25
159:22,25	240:1	Chris 5:10,11	229:8	219:23 223:4

Osta Davis

August 19, 2022

Page 246

230:8 comes 137:16 199:5 217:15 220:18 225:18 comment 140:24 141:2,3 142:23 142:24 comments 12:3 93:13 143:2 commission 5:8 5:19 6:4 10:8 11:14 13:22 14:16 19:2,3,6 19:9,10,17,18 19:21 20:7,7 20:19 21:7 23:20 24:7 29:4,21 33:11 34:10,11 36:10 37:2,9,12,14 37:17,19 40:6 40:20 41:23 42:12,14,15,18 44:25 45:20,21 47:13,15 56:10 58:8 60:1,13 60:16 61:22 62:21 63:10,19 65:12,15 68:25 71:6 80:13 86:15 92:4,13 103:13 121:2 129:19 133:24 136:19 138:24 141:14 143:24 144:22 145:11 145:15,20 148:10,13 149:2,3 152:9 155:16 156:5 179:6 211:23 212:18,21 213:12 218:24 219:25 220:11 224:14,15	229:23 230:3,6 234:21 237:3 commission's 6:3 173:25 212:1 236:24 commissioned 216:21 218:5,8 commissioner 33:21 34:1,7 35:7,12,14,16 35:17 36:11,18 38:5,11,17,20 40:17,17,19 41:18 42:4 43:1,4,8,9,21 44:1,7,13,23 45:9,10,17 47:23 48:1,3,6 48:19,20 49:5 49:6,16,17,20 51:13,13 52:3 53:5 54:2,4,10 54:14 56:9,23 56:24 57:1,2 58:1,12,15,16 58:24 59:8,13 59:20 61:12 63:2,4 64:12 65:3 70:5,15 70:19 71:1,11 71:13,16,16 72:16 74:4,5,8 74:8,17,18,23 74:24 75:4,21 78:11 79:1,17 79:22 80:1,4,7 80:8,17,17 81:15,16,21,21 81:22 82:2,3 82:10,16,16 85:10,12 86:5 87:21 91:16,18 91:23 92:19,22 93:3,5,9,9,17 94:5 95:25	96:1 97:2,5 99:3,4,5,23 100:6,14 101:3 101:15 108:2 108:12,16 109:9 110:22 111:2,5,9 112:9,17,21 113:11 115:6 116:15,22 117:10,16,17 117:20,24 118:3,4,6,8,9 118:22,23 119:4,5,11,11 120:2,16,16 121:1,15,21 122:2,10,14,15 123:11,14,25 124:4 125:15 125:23 126:17 126:20 127:1,9 127:12,21 128:9,14,19,20 128:24,24 129:2,8,17,23 129:25 130:5,7 130:10,17 131:4,19 132:14,15 134:10,14,15 134:18,19 135:5,6,7,10 135:10,14,14 135:23 136:2,5 136:8,21,24 137:2,11,19,23 137:25 138:1,9 138:22 140:7,7 141:12,18 142:9,25 143:9 143:24 144:8 144:12,19 145:3,7,9,14 148:13,14	150:1,7,16,19 151:4 154:20 159:7,9 164:25 164:25 165:2,3 166:19,20,23 167:10,17,20 167:21 168:8 168:18 170:14 173:1 175:25 176:5,9 177:7 177:8,11,13 178:4,14,22,24 179:5,9,10,13 179:20,22,23 179:25 180:3,7 180:19,21,23 181:3,4,11,12 181:18,18,21 182:7,11,13,18 185:16,21 186:4,13,14 190:20 193:15 193:16,17 194:8,8,12,13 194:18 195:6 195:22,24 196:4,15 199:23,23 200:5,21 201:14,17 203:16 205:17 205:18,25 206:4,7,12,14 206:15,19,22 206:25 213:16 214:4 215:25 216:10 219:7,8 219:14,16,21 220:10 223:12 224:10 227:14 230:5,10,13,14 230:18 231:6 231:20 232:1 235:22,23 237:11,14	commissioner... 41:21 commissioners 11:7 29:14 33:19 38:3,8 40:5,13,18,21 42:20,24 43:7 43:20 51:19,25 51:25 52:16 53:22 59:25 65:4,10,11 74:9,13,13 75:3 79:2,21 80:14,18,22 86:16 87:11,16 87:20 115:8 127:23 133:6 134:2 138:17 139:13 143:8 143:11 162:18 162:23 163:1,3 163:21 164:5 173:11,14 185:10,22 186:19 193:22 193:24 196:23 196:24 197:3 203:24 204:5 204:13 206:2 207:12 213:6 213:10 216:15 225:21 231:14 231:21 235:8 236:9 commissioners' 11:14 77:3 143:11 commissions 224:12 228:23 committee 24:2 24:3 25:6,9,11 25:17,19 communicate 57:3 communication
---	--	---	--	--

Osta Davis

August 19, 2022

Page 247

34:7,10 57:7 79:3 communicatio... 15:3 16:10 29:13 communities 50:19,22 52:7 99:12 111:16 112:23 125:16 126:1 127:5 142:15,17,19 142:25 143:3,6 143:7 151:3,8 151:17,18,21 151:23 152:7 community 47:10,22 67:9 88:13 113:1 129:21 159:13 170:24 171:2,7 171:13,17 compact 88:12 88:19 compare 147:14 compared 76:7 83:17,21 competitiveness 236:4,8 Complaint 7:21 15:10 25:23,25 26:8,15 31:8 147:23,24 complete 10:5 58:10 59:18 93:19 completed 207:16 completely 13:13 44:3 56:20 220:8 222:22 Complex 3:10 compliance 90:16,17,23 91:7 93:1,20	97:12 123:10 170:12 228:18 compliant 91:19 121:23 126:23 127:13 128:10 128:16 130:1,6 130:23 131:5 133:1 145:19 182:15,19 comply 91:11 93:22 123:2,7 composed 133:14 compound 29:7 30:21 35:1 36:5 40:1,24 47:3 58:25 67:5 75:7 77:2 87:17 94:7 102:21 133:15 138:11 150:9 187:8 196:2 209:3 comprised 50:3 171:21 compromise 235:9,16,20 237:3 compromises 235:25 computer 105:2 concept 109:20 219:2 concern 126:21 127:21 concerning 93:12 concerns 127:24 200:16,22 conclusion 32:20 88:22 133:3 168:18 212:9 215:8,17 218:17 223:1,3 235:12 236:7	237:6 238:13 conduct 15:13 15:17 19:9,16 21:6,10 47:15 63:22 84:21 85:2,10 99:2 103:10 107:20 107:20,23 134:3 143:15 143:18,21 148:5,8 239:10 conducted 45:25 63:24 66:10 103:14 107:14 124:5 133:24 143:25 148:14 149:3 223:18 conducts 18:15 85:21 conference 90:8 207:3,8,11 214:15,16 217:23 conferencing 7:3 configuration 163:18 configurations 11:15 conflate 122:2 conflict 49:3 confusing 17:24 confusion 17:19 Congress 216:16 216:16 Congressional 67:23 78:1 117:2 216:14 218:25 Congresswom... 216:4,8,9,12 connect 175:5 connected 151:5 connecting 174:16,18	connection 13:21 15:14,18 20:11 217:6 consent 190:1 consequences 134:25 consider 72:2 107:19 173:3 182:14 187:5 236:10 consideration 76:19 107:5,17 116:14 197:8 considerations 140:19 144:14 considered 11:13 122:20 128:15 142:19 142:20,22 144:12,23 163:22 considering 162:14 173:6 consist 82:16 consolidating 41:24 constitutes 85:20 Constitution 6:5 236:4,19 constraints 88:24 consult 86:6 128:20 134:15 169:11 consultant 156:3 consultation 107:14 111:19 156:6 consulted 80:1,5 86:2 89:19 129:1 205:18 consulting 93:25 205:16 Contact@Lak...	1:24 240:25 contain 72:7 contained 106:21 161:5 186:9 containing 213:18 context 33:5 127:8 160:20 199:17 237:25 continually 112:11 continue 56:17 56:23 69:10 135:15 191:10 228:4 237:13 continued 2:25 3:1 4:25 5:25 23:17 214:23 continues 37:5 Continuing 164:9 contours 164:2 contracted 134:3,10,19 148:13 149:2 230:10 contracting 134:15 contrast 32:24 33:3 contribute 70:9 contributed 36:21 control 237:12 237:13 conversation 94:8 99:9 115:12 127:9 139:11 154:21 154:23 179:18 187:4 196:1,3 216:5 conversations 35:5 79:5 92:2
---	---	--	--	--

Osta Davis

August 19, 2022

Page 248

94:2 97:14,19 100:17,19 109:19 110:8 116:16,19 118:14 121:17 122:1 131:11 137:13 141:22 142:4 144:22 186:10,11,14 187:10 194:7 203:22 209:20 209:24 conveyed 118:3 118:12 179:17 cool 125:6 coordinated 216:13 231:20 coordinating 36:13 copies 104:12 copy 5:13,13,13 5:16,16 153:17 158:9 164:19 198:9,9,9 201:25 202:1 correct 41:11 51:15 53:7 75:13 76:20 89:23,24 101:11 110:23 139:16 142:8 149:4,5 158:22 158:23 159:13 185:25 186:7 199:20 202:5 204:24,25 205:5 207:25 220:23 229:25 230:1 231:16 234:12,13 237:13,18 239:16 corrections 240:3 correlates	222:17 corresponds 160:8 council 31:9 108:22,23 109:13 110:2,2 110:5 212:17 217:5 counsel 7:23 8:1 9:6 10:16 14:7 14:11,21 15:1 15:4 17:13 26:14 92:1 97:19 105:4 132:11 146:9 152:15 154:4 155:3 156:17 157:16 159:2 165:18 169:7 169:11,19 170:3,12,16 188:12 190:12 202:9 212:15 224:19 233:4 234:3 236:12 238:4 239:12 239:13,17 counties 29:25 72:3 76:18,18 76:23 77:1,4 77:20,20,24 112:1 209:2,5 county 5:19,20 31:9 32:5 51:1 67:21,22 73:15 137:9 138:23 141:13 199:1 212:17,17 218:23 239:3 couple 5:18 50:4 102:13 103:16 104:3 183:9 189:10 228:14 229:10,21 course 22:24	51:3 113:4,7 113:17 171:7 courses 23:9 coursework 22:19,21,23,25 court 1:1 6:2,3 9:14 12:9,11 12:14 32:3 155:3 191:10 191:16 207:5 208:3,16 217:25 227:10 234:11,20 235:21 239:4 Court-Adopted 5:11 COVID 108:25 crack 112:19 create 111:22 128:12 140:17 141:6 142:10 179:6 208:24 212:5 237:15 created 11:8 78:5 127:3 131:20 138:24 141:14 143:16 152:8 creating 11:9 50:19,21 111:15 126:18 132:24 141:7 143:10,19 150:17,21 creation 203:7 credibility 12:4 CRISTINA 3:8 Cristina.Sepe... 3:12 Cristine 8:12 criteria 107:8 critical 145:4 cross-notice 189:20 cultural 109:20	109:21 current 32:14 68:21,22 83:18 83:21 133:13 138:24 141:14 152:8 155:20 167:8 170:25 currently 27:17 155:19 167:13 cursor 166:22 200:10 cuts 165:22 CVAP 106:24 108:7 110:12 114:15 117:8 117:11 118:19 129:19 130:1,2 132:7,8 133:20 133:25 134:4 153:25 154:1,2 154:17 157:15 158:20,22,24 162:4 166:23 167:23 168:5,6 168:9,15,20 174:1 177:14 177:22 178:5 178:15,16,17 178:18,19,25 179:1,7,14,21 180:5,22 181:5 182:10 202:4 203:5 208:25 209:18,18,22 209:25 211:20 215:6,14,14 223:7 cycle 21:21 24:20,21 28:4 115:23 117:2 155:16 cycles 22:5 25:8 115:12,15 <hr/> D <hr/>	D 5:16 202:1 D-I-S-T 227:11 D-U-C-H-I-N 218:2 daily 57:5,7 Dallin 3:16 8:18 8:20 229:2,19 data 29:18 34:12 34:15 36:15 64:12 66:21,23 67:1,2,3,3,4,6 67:8,10 68:21 68:23 69:1,2,3 69:7,10,11,16 69:17 70:1,1 73:23 74:16 75:17,19 76:1 83:11,13,15,17 84:2,4,7,11,15 85:13 133:18 159:16,22,23 159:25 160:8 160:13 167:23 172:4,6,9,16 226:19 227:1 228:8 233:6,7 databases 172:5 datasets 160:11 160:15 date 21:22,23 160:24 161:18 162:9 220:22 240:18,22 dated 157:17,19 157:19 dates 13:5 38:25 55:19 Dave's 28:11 39:17,23 40:2 40:9,18 41:5,7 59:1,6,14 60:9 71:2 73:4,11 83:12 84:1,2 85:7,14 103:24 105:1 106:5
--	---	---	--	---

Osta Davis

August 19, 2022

Page 249

110:16 114:14 153:16 156:8 156:15 160:2,5 160:9,14,22 165:13 166:20 166:22 175:2 211:15 Davidson's 180:18 Davis 1:15 2:2 4:2,10,12,16 4:18,21 5:2,9 5:13,15,18 7:4 7:11 104:5 114:13 124:17 149:9 152:13 155:8 160:19 164:14 169:4 176:16 182:23 187:20 189:22 197:24 201:9 204:22 213:25 217:11 220:17 223:21 229:18 233:16 234:17 236:16,23 238:12 240:2 240:20 day 21:25 22:1 33:14 34:18,18 34:19 36:2,4 55:21 173:17 185:8,17,19,20 187:9,10,15 195:8 196:12 196:18 197:20 206:1 207:9,13 211:12 238:7 239:20 days 34:11 183:2 DC 2:10 deadline 63:14 113:15 185:13 deal 118:5	196:24 197:2 deals 195:23 decade 227:24 December 234:11 decided 205:11 decision 80:11 138:2 237:25 decisions 10:8 116:23 205:2,6 205:8,10 231:25 deck 102:7 Declaration 6:4 decrease 83:24 deem 11:23 deep 217:6 defendant 3:7 11:5 defendants 1:8 8:19,21 229:20 Defense 2:21 7:14 defer 128:20,24 137:4 189:7 deferring 136:4 defined 80:13 definitely 165:24 definition 28:25 definitions 29:5 29:8 degree 92:2 97:19 221:23 237:5 delegation 216:14 Dem 25:11 Democrat 163:19 Democratic 24:1 24:3 25:5,9,10 25:19 28:2 33:18 35:3 41:25 49:7	92:3,4,13 94:14 95:19 98:13 115:19 121:24 122:21 123:2 128:11 128:13 131:8 131:15,17,25 133:12,13 138:6 170:4 173:11 182:3 187:2 216:16 228:1 230:20 231:14 232:11 237:12,18 Democratically 232:23 Democrats 112:11,13 122:2,23 227:18 232:18 demographic 228:8 demographics 30:8,19 72:4 83:8,10,20 84:3 182:5 demonstrating 180:21 depend 33:1 depending 68:14 depo 14:2 deposed 13:19 deposition 1:14 9:1 14:2,11 15:4,7 26:16 28:20 177:1 189:20,22 191:1,8,13 229:22 238:7 238:20 239:6,8 239:10,11,15 240:2,3 depositions 11:6 Deputy 37:3	descent 28:24 Deschutes 3:4 describe 131:8 136:16 163:8 described 131:21 207:4 describing 142:24 203:21 226:18 description 4:9 5:1 6:1 11:16 161:13 descriptions 5:23 31:7 designated 18:14 47:5 desire 111:18 131:8 138:25 139:5 141:15 177:20 desired 237:14 desires 130:10 details 14:15 determination 75:15 76:1 77:9 136:20 223:10 determine 121:7 121:10 123:18 226:9,9 determined 76:12 77:21 developing 45:15 deviation 72:17 Deylin 2:20 7:13 10:10 189:17 DHolt@Holtz... 3:18 differed 111:5 difference 117:6 differences 174:13 different 32:23 45:23 53:19	56:20 58:4,4 60:9 74:14 120:7 121:3 127:23 130:22 140:24 147:8 161:9,14 162:11,13,16 162:20 163:9 163:10,13,13 163:15,23 164:6 174:8 175:8,10 186:1 191:18 203:22 209:8 differently 44:24 differing 80:14 difficult 38:7 109:2 129:18 difficulty 130:8 digest 85:13 digesting 41:24 digital 104:11 Diplomate 1:23 239:22 directed 16:10 directing 154:24 direction 34:4 136:22,25 137:4 154:19 159:6 180:16 214:14 228:6 239:7 directive 77:5 150:17 directives 77:3 directly 38:18 58:24 117:23 215:22 219:24 222:1 director 45:14 63:18 170:23 disagree 145:23 184:18 197:5 disagreed
--	--	--	---	--

Osta Davis

August 19, 2022

Page 250

122:16,18,19 137:3 disagreement 137:15 138:2,3 145:6 146:3 disagrees 10:20 disappointed 126:23 disclosures 11:11 discrepancy 166:18,25 226:19 discriminate 236:25 237:8 discrimination 31:1,12 discuss 10:7 14:10 63:16 66:5,10,13 92:20 93:8,21 94:1,6 97:11 100:22 102:16 102:17 114:25 120:17 190:15 191:1,7 192:18 216:10 238:14 discussed 90:10 91:25 92:22,24 93:18 94:4,5 98:3 100:23 103:4 119:11 119:19 120:23 120:25 139:8,9 154:1 163:1 171:16 173:19 173:24 186:14 197:9 discusses 150:15 discussing 74:3 92:10 102:24 127:13 226:8 discussion 87:8 114:2 115:4 119:23 124:21	127:19 155:3 169:17 189:13 211:7 225:22 discussions 91:22 96:10 120:20,21 133:7 185:12 187:1 195:13 209:16 disparities 147:11 disparity 57:16 displace 177:20 displaced 177:25 199:1 displayed 73:13 114:13 153:18 164:18 165:17 175:4 198:4 199:7 201:12 disposal 85:8 dispute 137:10 dist 227:8 distinct 29:5,8 33:2 distinction 209:4 distracted 11:2 district 1:1,1 4:19 52:7,15 67:23,23 72:1 72:4,11,11,13 72:22 73:19,19 76:7,7,14 77:25 78:1 83:21 88:25 99:15 106:23 107:1,2,5,7,9 107:16,21 108:8 110:12 110:18 111:6 114:16,16,18 114:23 115:1,2 115:9 117:12 118:7,10,20,24	121:5,7,9,23 121:24,24 122:12,17,20 123:1,6,9,17 123:19 124:1,6 126:18,23 127:14,20,22 128:10,11,13 128:16 129:7 129:15,20,20 130:1,6,24 131:6,9,15,18 131:21,22,24 131:25 132:6,9 132:9,15,24 133:1,20,25 134:5 137:7,19 138:4 139:22 139:24 140:3 140:12 141:21 141:25 143:22 144:1,3,13,20 144:23 145:20 150:17,21,25 151:19 153:25 153:25 154:2,3 154:18 157:15 158:20,21,25 162:12,14,16 162:18,20 163:10,13,18 163:22,24 164:2,6 166:21 167:7 168:6,9 168:20 172:23 173:3,25 177:14,22,23 177:23 178:5 178:15,16,18 178:20,24,25 179:7,14,21 180:5,22 181:5 181:15 182:9 182:14 185:3 186:3,15 195:2	195:17 199:2 199:22,24 200:1,2,4,5,12 200:20 202:4 203:4 205:11 208:22,25,25 209:1,5,11,14 209:17,18,22 210:1 211:20 212:6 215:14 216:6,25 219:4 223:7 226:23 226:25 227:6 227:25 228:3,6 237:3,7 240:21 districts 27:6 32:12,14 50:19 50:21 58:11 72:7,8 74:3,22 75:23 83:8,20 88:12,16 89:1 101:7 107:24 108:13,15 111:15 112:15 115:14,16,25 116:1,5,9,17 117:8,8,18 123:7 124:10 131:20,25 132:18 137:1,5 137:11,14,17 138:10,18,23 139:10,14,17 139:21 141:7 141:13,23 142:10 143:10 143:13 151:21 160:3 167:10 172:14,17,19 181:20 186:17 186:20,20,21 186:25 187:2,7 195:1,12,15 196:7,11,16,18 197:1,8,16,18	199:19 200:14 200:17,23 204:11,15 208:7 215:22 219:3 236:1,2 236:5 Division 3:10 document 105:8 149:21 152:17 153:18 156:18 161:2,5 164:18 165:17 175:4 188:15 190:13 190:15 198:4 199:7 201:12 220:23,24 221:20 223:24 225:24 234:22 documenting 183:23 documents 15:6 15:9,15,19 17:6 26:11 188:20 doing 19:10 28:15 29:3 105:18 110:15 121:14 137:22 205:15 207:2,9 213:14 214:14 dokie 234:1 Dom 5:11 Dominique 4:12 4:14,21 5:2,9 36:21,23 37:3 38:14 55:4,9 55:10,13 56:8 56:13,17,22,25 57:3,10,13,17 70:8,15,22 82:20 84:20 85:2,6 95:3,12 101:15 126:3 150:8 194:1 195:22 196:14
---	--	--	---	---

Osta Davis

August 19, 2022

Page 251

dot 19:14	draw 57:13	81:13,16,21	140:17	21:6 54:9
dots 222:17	58:22 59:6,11	82:2,15,23	efforts 147:3	78:13 100:7,9
downstream	59:13 67:4	119:10	EHerrera@M...	103:17 104:9
140:17	70:5,20 71:2	dyads 80:11,13	2:23	105:15,22
Dr 86:12 89:10	71:23 76:20	80:20,24 81:1	eight 183:7	106:6,21,22
89:21 90:3	88:16,25	dynamics 97:25	204:19	114:15 124:15
91:4 101:11,14	145:21 148:4	<hr/>	either 34:8	124:25 125:1
101:19 102:5	165:5 173:5	E	57:10 75:3	134:23 135:21
103:9 106:13	drawing 28:4	E 2:1,1 4:8,19	123:12 132:4	145:2,2 149:7
106:17 107:3,7	58:2,14 66:18	7:8 211:8	137:24 148:12	149:10,13,15
119:8,12 120:3	83:7 85:22	229:16 239:1,1	184:3 206:5,6	149:22 152:11
120:14 121:16	88:5 106:18	earlier 37:6	207:19	152:25 153:7
123:23 124:11	122:16 159:21	54:20 101:10	elaborate 28:9	153:11,13
124:13 130:18	160:3 174:8,21	111:9 211:14	72:25 93:2	155:9,25
133:22 134:10	227:17 230:4	229:22 237:10	115:4 119:25	156:12,16
134:16,20	236:5	earliest 225:15	elect 25:3 50:20	157:14,17,18
144:9 148:20	drawings	early 36:3,6	50:22 88:13	157:20,21
168:4,11,21	122:19	ease 177:15	111:17 112:23	160:18,21
173:9,10,14	drawn 32:13	easier 9:4 76:3	121:6,9 122:12	161:1,5,7,21
175:23 211:25	88:12 110:18	233:22	123:17,19	161:22 164:10
213:1,18	112:15 121:8	easily 73:13	124:2,6 126:18	164:22,24,25
219:20 220:11	140:17 162:20	east 199:1	129:22	165:4 166:19
221:5 223:1,3	176:1 236:24	eastern 140:16	elected 112:11	166:24 167:18
223:16 226:17	237:7,13	216:25	123:2	167:20 168:1
230:8 231:3,5	drew 58:10,13	Eddie 8:7	electing 122:23	169:25 170:2
231:9,14	59:20,24 70:7	Eddie@Morfi...	122:23	170:18 171:22
232:11	70:23 85:3,11	3:5	election 60:9,10	173:8,10
draft 4:10,11	89:7 114:23	Edge 39:12,13	73:20 84:15	175:10,13,22
11:15 45:11	165:3 215:22	40:11,19,25	115:15,17,23	176:15 177:4,6
55:10 99:17,20	drop 103:24	41:2 59:11,21	116:4 117:13	177:7,13 179:8
99:24 100:2,7	124:19 149:17	59:24 60:1,4,8	elections 5:19	179:14 180:7
100:25 101:3	dropped 149:23	62:5,13 63:20	31:13 35:25	182:8 187:14
102:13 124:10	205:25	63:22,25 65:8	117:12 133:19	187:16,16,22
150:4 166:17	dry 71:21	66:1,6,9,11	172:5 229:24	187:23 188:3,3
183:16 187:12	DThrift-Viver...	207:15,20	electoral 72:1,25	197:20 198:1
203:3	2:23	edges 187:7	73:10 74:2,14	198:11,13,13
drafted 40:8	Duane 180:18	edited 167:16	75:5,21 79:23	198:15 201:7
43:12 85:7	Duchin 217:24	edits 161:24	132:23,25	201:14,15,21
137:24,25	218:2	Educational	164:1 236:8	202:3 213:17
drafting 41:23	duly 239:14	2:21 7:15	element 36:10	214:1,3,6
59:16 142:20	duties 41:17,18	EDUARDO 3:3	eliminate 111:25	215:2 216:3,20
149:25 150:2	42:3 55:5,5	effect 12:10	email 4:10,14,16	217:16 219:16
159:15 202:24	56:19 63:7	99:22 151:11	4:20,23 5:15	220:19 224:1,2
203:1	dyad 80:12,15	effective 239:23	5:17,22 19:5,8	224:4,21
drag 233:14	80:18,19 81:12	effects 32:13	19:11,12,16,20	225:16,18,23

Osta Davis

August 19, 2022

Page 252

226:7,12 227:4 emailing 155:18 emails 4:12,18 4:22 5:2,4,9,12 15:21 16:3 17:11 18:2,5 18:12 19:2 20:1 21:7 47:8 103:16 104:12 104:19 156:14 156:21 170:10 170:12 206:2,5 206:12 employed 23:17 27:17 37:12,17 63:24 65:15 employee 37:1,8 239:12,12 employees 36:9 employer 33:17 employment 38:25 encompasses 109:22 encouraging 195:22 196:14 ended 39:6 195:19 engage 111:18 219:25 engaged 185:11 engagement 35:25 engages 26:21 ensure 90:20 91:19 ensuring 112:22 entail 27:4 187:3 entailed 44:3 entire 45:20 68:18 69:16 entirety 16:4 50:17 174:20 216:19 entitled 13:4	157:13 entity 192:1 environment 12:8 equal 72:7 89:1 equity 111:15 Erica 3:9 8:9 189:7 211:11 Erica.Frankli... 3:13 Ernest 2:20 7:25 8:2 104:24 105:3 essentially 199:18 200:12 234:20 estimate 13:5,9 25:12 33:23,23 34:8 46:10,12 66:17 67:9 68:9 69:2,3,7 69:10,15,17,25 70:1 118:12 estimates 67:11 67:20 68:2,7 68:17,24 182:10 estimation 40:3 41:7 158:17 167:9 et 1:3 2:6 18:16 240:20,20 ethnic 32:23 33:2,7 83:13 83:23 132:25 ethnicities 228:10 evening 238:17 event 47:16 events 5:8 47:25 62:11 183:11 183:23 220:9 eventually 227:8 227:11,17 exact 27:14 46:9	62:10 141:8 exactly 51:12 125:22 132:17 162:12 178:1 examination 1:14 4:1 143:5 239:10,14,17 examine 133:18 examined 239:7 example 12:18 83:23 118:13 examples 235:19 exceeded 77:24 131:22 Excellent 225:25 exception 240:3 exceptions 239:17 exchange 155:25 180:10 exchanged 170:10 186:5 195:11 exchanges 135:21 exclusive 20:24 exclusively 38:19 40:2,8,8 43:22 87:9 Excuse 14:10 47:13 132:7 executive 45:14 63:18 170:23 exhibit 103:21 103:23 104:4,5 114:10,10,13 124:16,17 145:2 149:8,9 152:12,13,16 154:8 155:7,8 159:1,3,5 160:18,18,19 160:21 161:3 161:10,19 162:2,10	164:11,12,14 169:4,22,24 174:22,25 175:9,13,20,22 176:15,16,21 180:6 182:6,22 182:22,23 187:18,19,20 192:18,22,23 197:21,24 201:8,9 213:21 213:25 217:10 217:10,11 219:15 220:15 220:15,17 223:20,21 225:5,15 228:15 233:14 233:16 236:12 236:16 exhibits 169:1 225:12 existed 212:12 215:21 223:5 existence 88:10 existing 58:8 73:23 83:18 99:19,21 expand 58:6 experience 235:22 experienced 31:1 explain 59:23 76:22 78:20 80:12,16 108:14 112:7 207:2 222:2,8 226:3,6,15 explanation 160:14 explicitly 117:22 exported 67:12 express 50:11,13 117:21,24	118:22 119:6 121:17 122:22 123:12 128:3 128:14 130:5 131:3,10 142:12 143:11 144:19 154:25 200:21 expressed 112:2 117:11,22 118:4 125:16 128:19 129:23 129:25 130:7 131:7 137:3 140:25 143:9 151:13 179:9 expressing 52:7 126:21 138:1 138:22 141:12 145:9 180:24 expressly 137:2 extends 109:21 <hr/> F F 239:1 facilitator 45:13 fact 112:10 179:20 factor 236:9 factors 107:8 163:22 Fain 40:17 44:1 63:2,4 79:21 80:4,8,18 81:22 116:22 Fain's 40:19 44:7 fair 56:13 218:9 fairly 233:3 fall 34:9 36:3 138:18 211:18 fallout 134:24 familiar 7:18 11:12 31:23 59:15 147:19
---	--	---	--	---

Osta Davis

August 19, 2022

Page 253

211:24 familiarity 62:5 62:13 familiarize 28:12 211:16 223:13 far 41:7 43:1 44:20 45:2 47:13,15 48:6 51:20 53:17,21 55:12 56:7,18 59:13 61:20 62:9 63:1,4 69:13 74:9,12 79:7,25 80:21 80:24 82:24 83:1 84:18,19 85:1,9 86:1,1 86:22 91:16,18 96:22 97:7 99:5 120:16 133:2 134:14 134:18 147:13 149:1 159:11 163:17 195:13 206:24 229:10 235:20 237:6 Farias 222:23 fashion 113:13 fast 10:11 fault 87:14 152:19 174:22 196:12 favor 236:25 237:8,18,19,21 237:24 favorable 232:12 February 220:23 Federal 185:11 feedback 41:24 156:2 feel 71:21 113:16 116:23	168:5,20 185:25 fell 132:10 fellowship 23:21 felt 118:6 128:3 168:8,9 fewer 96:20 138:25 141:15 177:20 178:4,6 field 38:12 146:23 Fifth 2:4 3:11 fight 145:3,7 figure 104:15 105:19 210:9 234:1 figures 149:4 figuring 36:7 file 152:16,19 160:1 172:7 176:25 206:4 207:20,25 filed 234:11 files 64:20 fill-in 56:14 final 40:9 61:13 61:25 62:3 111:11 121:2 128:21 129:5 185:13 195:19 199:24 200:12 205:10 206:3 207:10,14 208:2,12,15,21 209:11,14 227:4 235:25 finalized 207:22 Financial 67:10 67:14 financially 239:13 find 75:21 176:25 198:21 218:11,13 findings 218:12	232:7 fine 17:23 27:15 104:16 114:7,8 146:11 152:25 169:14 178:13 184:19 190:23 192:15 210:22 224:20 finish 10:3 firm 3:2,3 27:7 first 16:18 24:10 34:19 37:1,7,8 37:14,19 42:3 51:17 55:21 56:10 66:3 103:18 104:24 137:16 155:14 156:9,21 157:6 157:7 167:22 176:25 180:2 180:21 181:6 183:15,19,21 184:20 188:3 210:21 211:19 211:20 214:19 218:1 219:7 225:16 228:16 231:15 235:2,7 Fitzgibbon 100:3,7 five 46:7,8 96:18 96:20 139:21 190:8 204:19 206:11 210:11 236:22,23 five-minute 210:9 five-year 69:8 69:14,14 fixing 12:1 floated 220:10 floor 2:22 194:4 fluctuation 72:10 focus 36:16 51:1	99:16 140:4,14 159:21 focused 47:1 111:15 folks 32:23 37:22 43:9,11 50:5 102:23 108:24 110:1 111:20 121:14 142:24 follow 123:15 following 35:5 64:2 66:22 173:1 183:23 216:3,14 240:3 follows 7:7 followup 9:12 64:18 force 12:10 foregoing 239:6 239:17 240:2 foremost 137:16 foresee 128:1 forget 46:9 forgive 39:8 139:12 140:5 forgot 159:1 213:22 forgotten 139:20 form 51:23 52:12 57:6,20 61:23 64:5 65:14 67:12 70:10 77:23 84:8 239:7 formal 85:25 123:22 156:3 formalized 82:23 formally 35:6,14 format 60:2 239:18 formation 118:24 former 156:1	forms 147:5 forth 133:7 186:3,18 193:15 194:14 222:13 228:14 forward 20:3 164:24 225:16 found 75:17 198:22 foundation 55:8 91:2 133:16 144:6 222:15 232:5,15 233:11 four 34:13 98:25 100:10 115:22 195:21 204:19 206:11 222:10 four-year 117:1 fourth 186:1 fracturing 151:20,23 152:7 Franklin 3:9 4:3 8:9,9 10:23 29:25 57:20 60:25 91:1 133:2 135:1 138:11 144:5 169:16 188:21 189:9 190:12 190:22,24 191:9,15 192:14 210:20 210:25 211:2,9 211:11 212:13 213:22 214:1 215:5,10,24 217:9,14 218:9 220:14 221:1,2 221:3,9,15,17 221:18,25 222:24 223:19 223:22,24 224:16,22,25
---	--	--	--	--

Osta Davis

August 19, 2022

Page 254

225:3,7,10,14	3:10 8:15	given 21:21 98:2	77:19 78:3	53:23 55:7
227:11,23	16:25 20:25	182:4 211:23	92:1 97:18	57:6,18 58:25
228:24 229:7	21:24 33:9	215:21 239:8	103:17 104:1,2	60:23 61:23
238:19	58:21 66:20	giving 12:18	104:17,25	64:5,14 65:14
free 185:25	73:18 99:1,8,9	169:20 193:12	105:8,12	67:5 68:5
frequently 48:23	100:11 111:8	Glatt 31:24 32:4	106:20 110:10	69:18 70:10
48:24,25 53:9	122:8 148:25	go 8:24 9:5	111:8 113:9	72:14 75:7
82:3	163:9 214:20	10:11 12:15	114:10,11	77:2,23 79:10
fresh 13:18	232:22,25	15:21 18:2,3,5	126:9 134:22	81:8,17,23
Friday 1:17	General's 8:11	18:12 22:7,10	143:8 145:1	83:3 84:8,23
192:8	86:18 87:3	22:12,14 33:13	146:15 147:15	85:4,17 86:8
Fritts 4:18	88:3 89:9,23	35:16 52:24	153:15 155:6	87:17 88:21
155:14,15	212:2	53:1 55:18	156:8 158:10	89:11 90:24
225:24 226:7,8	generally 9:7,17	56:1 76:16	159:17 160:23	92:1,12,16,21
226:18 227:24	45:19 48:11	105:15 106:22	161:11,17	94:7 97:18
front 12:11	53:12 58:14,17	109:7,9 110:15	165:12,14	101:8 102:21
175:2 176:19	59:10 63:15	113:25 114:4	175:7,21 182:6	103:19,21
234:14	64:20 71:2	132:3 146:13	184:16 188:13	104:1 105:4,7
fulfill 85:24	80:16 82:7	152:5 166:1	189:7 190:4	105:11,14,17
full 12:18 110:2	83:17 94:24	170:11 183:9	191:25 192:6	105:20,23
204:16,17	95:1,2 99:11	183:14 185:7	199:6 201:24	106:1 108:9
239:16	101:6 147:4	189:4,5,9,11	202:20 203:19	113:22 115:18
fully 34:11	154:24	189:15 193:9	205:4 210:8	116:2 117:14
function 59:2	Generals 90:4	198:20 199:8	216:20 222:14	119:13 120:9
Fund 2:21 7:15	geographic 47:2	199:16 200:8	225:23 226:3	121:12 123:4
funding 171:3	47:5 88:24	202:15 210:11	226:11 233:13	123:21 124:18
funds 230:19	163:16 222:19	210:19,21,25	234:4 235:3,17	125:19 126:7
further 51:5	geography 30:7	211:1,1 219:15	236:11	127:17 128:5
64:21 151:19	187:3 236:1	225:16 228:13	Goldman 2:3	128:18 129:12
180:6 204:18	Gersten 1:22	229:15,20	8:14,15 10:21	130:25 132:11
228:25 239:7,9	239:22 240:23	233:9 234:8	14:22 15:23	133:4,15,21
239:11,14,15	getting 11:2	235:1,4 236:11	16:1,5,7,14,17	144:2 145:18
future 227:7	28:14 30:7	goal 72:7,20	16:22 17:1,4,7	145:24 146:5,9
FW 5:10,13,23	224:11,23	107:10,10,13	17:13,18,21,24	147:15 150:9
Fwd 4:23	Gingles 218:12	108:8 113:12	18:22 19:7,22	150:20 152:3
	GIS 38:19 39:9	113:14 143:12	21:1 23:1,4	154:4,7,10,13
G	39:24 43:5,8	goals 50:12	26:9 28:16	156:17,20,25
G 1:10	43:18,21 60:20	108:5,13	29:7,15 30:3	157:2,6,9,16
G-L-A-T-T 32:4	62:6 95:22,24	128:17 140:9	30:21 32:19	157:22,25
gain 145:14	give 12:5 13:12	going 9:2,5,5,7	35:1 36:5	158:3,7,11
Garcia 15:19	33:22 45:14	9:25 10:14	37:10,15 40:1	159:2,17
Gates 24:2 27:1	78:19 88:9	16:5,9 17:7	40:14,24 41:15	160:23 161:11
27:7	164:7 190:2	28:20 34:23	44:15,21 45:5	161:17 162:8
gather 67:24	196:20 227:5	39:18 42:2	47:3 49:13	162:17 163:4
general 1:19 3:9	234:6 235:19	55:4 69:14	51:23 52:11,21	163:11,20

Osta Davis

August 19, 2022

Page 255

164:3 165:18 165:22 166:1,3 166:5,9,12 169:7,9,13,15 169:19 174:3 174:24 175:7 175:16 176:2 176:17 179:15 182:16 184:7 184:13 187:8 188:12,15 189:7 190:8 191:18,21 192:5,11,22 193:3,6,9 196:2 198:7 199:10,13,15 199:25 200:3 201:22 202:9 202:12,15,20 205:13 206:8 206:23 207:23 208:17 209:3 212:8 215:4,7 215:16 218:6 220:24 221:6 221:13,16,20 222:14 227:19 229:2,13 230:16,24 231:4,10,23 232:4,14,20 233:4,8,10,19 233:24 234:3 234:10,14 235:1,11 236:6 236:20 237:5 238:2,8,11,13 good 7:10 8:14 8:17 34:5 139:25 166:4 229:18 238:17 Goodman 199:2 gotcha 108:18 gotten 34:12	government 27:3,10,11 111:17 governor 112:11 governor's 73:16 76:10 grab 225:12 graduated 23:19 graphs 102:12 Graves 5:5 43:20,21 44:13 74:4,5,8,14,18 74:24 75:4 78:14 79:3,17 79:22 80:17 81:16,21 82:3 82:10,16 92:23 93:3,5,9 116:22 119:11 120:2,16 121:16,21 122:2,13,14 123:11,14 131:19 133:6 137:25 138:17 139:14 140:7 145:14,14 164:25 166:20 167:21 177:8 177:11 178:14 179:5,9,13,25 180:3,7,21 181:4,12,18 186:4,14 193:15 194:8 194:12 199:23 200:5 225:21 227:14 235:22 Graves' 128:9 177:13 Graves's 178:4 great 7:13 8:23 9:24 10:7 104:21 105:21 118:5 141:17	158:3 201:5 236:13 Grose 5:4 44:11 44:14 65:22 82:13,17 177:4 177:7 203:7 204:21 205:20 207:13,18 ground 8:25 grounds 202:21 202:23 group 2:3 8:16 33:7 49:7,9 65:9 237:1,9 grouped 193:2 193:12 groups 33:1 47:1,10,22 48:7,10,18 49:18 50:7,8 80:23 109:24 147:8 grown 140:16 182:2 growth 228:8 guarantees 190:3 guess 13:6 22:7 32:25 39:19 51:9 73:23 76:3 80:22 109:2 137:21 158:14 161:23 171:18 183:15 185:7 195:8 200:18 204:4 209:4 215:5 219:7 237:19 237:24 guidance 45:14 guide 93:22 183:2 184:17 guideline 239:18 <hr/> H <hr/>	H 4:8 half 115:22 116:7 Hall 5:3 170:3,5 170:9 Hampton 194:5 hand 145:15 239:19 handful 96:15 hang 169:16 221:11 224:16 happen 13:12 60:21 128:4 happened 13:6 13:10 52:8 81:6 97:20 100:19 125:13 167:16 185:8 204:2 228:19 230:11 happening 128:1 happens 13:16 191:23 happy 210:25 233:23 hard 51:11 62:10 79:15 149:20 161:23 165:8 Harless 2:8 8:5 Hawkins 100:13 Haymarket 3:17 HDC 193:1,11 193:20 head 9:17 139:21 172:18 heard 31:4,6,7,8 31:10,15,18,21 31:24 32:5,8 196:22 hearing 41:20 122:15 197:2 heavily 96:23 held 42:8,12,14	77:5 98:4 235:23 237:22 help 38:4,12 93:21,22 113:12 160:11 173:4 223:13 helped 37:6 45:11,14 55:10 166:17 203:3 helpful 13:2 17:15 224:19 225:6 helping 36:11 helps 167:6 172:4 hereunto 239:19 Herrera 2:20 7:25 8:2 104:13,20 124:21 152:23 153:9 188:18 189:4 191:16 217:12 223:2 Hi 7:10 high 22:10 higher 110:12 168:17 179:21 highly 192:7 Highway 3:17 hire 38:19 120:6 120:8 hired 27:10 33:14 34:17 36:9,24 37:4 39:2 90:13 93:6 156:5,7 214:17,23 hiring 34:24 93:21,24 144:8 Hispanic 28:21 28:22 29:18,19 30:22 106:24 107:17 108:7 110:11 114:15 117:8,11
---	--	---	--	---

Osta Davis

August 19, 2022

Page 256

118:19 121:5,8 126:18 129:20 133:25 147:18 153:24,25 154:2,17 157:15 158:20 158:21,24 162:4 166:23 168:6 174:1 179:7,13 180:5 180:22 181:5 202:4 203:5 209:25 210:5 211:20 215:6 215:14 216:6 218:13,14 223:7 228:8 Hispanics 121:8 122:12 123:16 123:18 124:1,5 232:17 historic 151:20 151:22 152:1 history 26:19 146:16 hit 72:21 Hobbs 1:6 7:16 15:19 18:1 240:20 hold 24:8 41:13 181:7,9 202:7 235:23 238:6 holder 190:13 holding 119:8 holiday 22:1 Holt 3:16 4:4 8:17,18,22 10:10,13 104:11,16 152:15,20,25 153:4 189:17 190:10 210:22 211:1 224:20 224:24 225:1,4 225:8 229:4,9	229:14,17,19 230:22 231:2,7 231:13 232:3 232:10,17,24 233:7,9,13,17 233:21 234:1,6 234:13,16,17 235:2,15 236:11,15,17 236:21 237:10 238:6,9,12,18 Holtzman 3:16 8:18 home 206:1 honestly 152:21 hope 189:20 hopes 189:21 hospitals 99:15 hosted 214:15 hour 146:10 194:12 hours 114:8 190:8 193:19 house 16:21,23 16:24,25 18:20 18:25 24:3 25:9,10,19 28:2 33:18 35:3 41:25 92:4,13 94:14 95:9,19 97:25 98:4,5,8,10,12 115:19 116:9 206:1 hovering 166:22 huge 153:2 Hughes 3:8 8:11 hybrid 176:25 hypothetical 232:21 <hr/> I <hr/> idea 81:12 116:20 121:22 129:10 220:10	identified 11:12 47:11 identifies 127:10 127:11 identify 7:23 29:19 identity 109:21 ignorance 39:8 II 6:5 236:18 illegal 88:16 image 11:3 imagine 56:19 impact 215:22 implicit 195:9 implicitly 197:10 important 9:15 219:6,8,12 223:11 225:19 impossible 72:9 impression 135:22 improved 187:1 improving 181:7 in-person 186:6 186:9 include 29:14 66:23 83:13,14 92:7 187:12 200:19 209:17 232:2 included 41:18 41:20,22,23 50:6,17,19 54:16 59:5 63:20 73:16 80:8 87:8 114:18 142:24 195:2 197:17 208:21 209:11 209:14 includes 28:23 137:9 148:25 including 76:8 97:21 212:11	235:25 239:16 inclusion 209:21 209:25 incomplete 232:20 incorporate 106:17 incorporated 106:12,17 204:9 increase 83:23 138:6,24 141:14 180:17 increased 30:11 30:23 incumbent 177:20 incumbents 177:15,24 178:1,1,5,6 independent 34:3 INDEX 4:1 Indian 108:6 109:13 114:19 indicate 33:6 215:19 indicated 168:12 222:16 239:8 indicates 161:13 indication 179:5 180:3 181:12 215:21 indigenous 111:19 individual 48:8 76:4,6 individually 48:7 49:5 individuals 48:18 50:6,9 influence 116:10 164:1 informal 12:8 information	11:13 13:14 15:14,18 67:18 67:25 105:25 106:13 130:19 147:22 170:1 172:8 219:13 224:6,8 225:20 informed 13:4,8 212:22 initial 11:11 121:3 initiated 216:11 initiative 25:2 Inn 194:5 inside 209:2 insight 99:12 instance 110:17 235:7 instruct 16:9 instructed 191:25 instructing 92:5 97:22 instruction 85:19 91:15 92:21 intact 107:11 intended 232:7 intention 111:3 203:4 224:6 237:21 interacted 136:15 interchangeably 28:21 29:5,9 29:11,12 interconnecte... 151:2,8,17 interest 28:7,18 48:7 51:4,6 52:7 118:5,9 118:18,23 128:12 138:22 140:14,22 141:12 142:16
--	--	---	--	---

Osta Davis

August 19, 2022

Page 257

142:18,19,25 143:3,6,10 163:6 180:22 181:25 211:16 216:2 interested 28:8 48:10 50:7 162:19 172:19 214:22 239:13 internally 131:21 interplay 132:22 interpret 222:2 222:4 interpreted 44:24 interrupt 95:6 intervene 17:21 intervenor 8:19 8:21 229:19 intervenor-def... 1:12 3:15 10:16 189:19 210:18 interviewed 35:6 introduce 233:13 introduced 4:9 5:1 6:1 104:5 124:17 149:9 152:13 155:8 160:19 164:14 169:4 176:16 182:23 187:20 197:24 201:9 213:25 217:11 220:17 223:21 233:16 236:16 invited 231:22 232:3 involved 14:16 25:6,9 37:22 45:7 54:23,25 55:9 66:18	87:9 92:2 96:23 133:19 181:19 197:16 198:1 218:2 230:8 236:1 involves 180:9 ISMAEL 1:10 issue 93:6 189:8 191:21,22 192:16 211:19 issued 20:14 issues 93:22 191:8 items 5:23 45:12 63:19 iterations 99:20 162:11,16 163:10,13 164:6 <hr/> J Jamie 100:20 January 5:19 90:12 jargon 66:8 Jayapal 216:4,8 216:9 Jayapal's 216:12 Jeanne 1:22 239:22 240:23 Jeanne@Lake... 1:24 240:24 Jessica 2:3 8:14 14:22 JessicaG@Su... 2:5 job 5:23 20:15 23:11,12,14 26:19 27:9 28:14 33:15 34:24,25 36:1 36:6,12 37:7 39:11 41:16,18 42:2 55:5 63:7	66:22,25 126:1 146:16 155:17 155:23 165:12 jobs 23:19 Joe 100:3,7 John 3:17 join 49:23 joining 8:13,21 42:7 JOSE 1:10 Jr 33:14 34:18 judge 12:4,11 192:7,8 judgment 128:21,25 jury 12:4,11 Justice 49:9,12 50:2,24 52:6 53:4,15,21 141:1 171:14 172:12 173:24 174:2,7,14 175:23,24 176:10 justifiable 76:25 Justin 60:18 61:13,14,17,21 62:7,9 64:2,8 64:11,25 66:4 66:13 71:12 207:20,21,24 <hr/> K K&L 24:2 27:1 27:7 Kamau 5:3 170:19 171:12 Katie 171:22,23 172:11 keep 34:23 151:4 155:6 keeping 108:5 112:16 139:8 Kennewick 3:4 Kent 137:9	kept 77:21 109:16 Kilduff 5:10,11 24:14 25:3 188:4,5 kind 21:23 26:23 27:1 39:22 58:21 77:16 80:16 165:22 172:6 183:1 203:21 224:24 King 22:1 33:14 34:18 51:1 137:9 138:23 141:13 199:1 239:3 know 7:20 9:16 9:24 10:2 13:3 13:5,7,10 15:24 16:12 18:17,19,24 20:24 30:8,10 30:13,14,16,19 30:24 32:11 38:21 39:6,10 39:22 40:12,23 43:1,4,7,12,14 43:17,21 44:13 44:20 45:3 46:17 47:6,15 47:23 48:6 50:2,17 51:20 53:17,21 54:1 55:12 56:7,18 57:21 59:13,20 60:21,21 61:20 62:3,9 63:1,4 67:24 71:21 74:7,10,12,16 74:17,23 75:2 75:8,10,15,17 77:15 78:8 79:5,8,12,19 79:25,25 80:7	80:21 81:10,12 81:15,20 82:24 83:2,5 84:1,18 84:19,25 85:1 85:9 86:1,22 90:20,22 92:25 93:18 94:10,13 96:22 97:1,7 99:8,23 100:1 100:6 101:3,5 103:13 104:15 108:1,3 114:7 114:9 116:4,7 119:10 120:11 120:13,17 123:24 124:4,9 124:12 125:18 127:8,9 130:22 133:10,23 134:2,7,15,18 135:9 136:11 137:10 138:3 140:2,20 141:8 143:24 144:7 144:12 147:13 147:16,24 148:12 149:1 151:22 152:1 152:22 154:13 154:17 155:12 155:17,23 156:5 158:15 158:24 161:9 161:23 162:1,4 162:11,15 163:2,17 166:25 167:25 168:8 169:9 170:20 171:1,2 171:23 172:6 177:16,22 178:9,22 179:8 179:9 180:12 184:5,10,19 185:1,4 186:9
--	--	---	---	--

Osta Davis

August 19, 2022

Page 258

186:18 188:5 193:23 194:3 194:19 195:13 197:15 199:22 204:5 206:14 206:21,24 207:17 208:14 208:20 211:12 217:20 218:4,8 227:21 229:11 231:18 233:17 234:3,9 236:17 238:3,4 knowing 57:15 knowledge 26:7 97:3,4 134:1 148:22 195:5 227:13 228:22 232:17 233:3 240:3 known 7:15 Kurt 4:18 155:14,15 225:24 226:7,8 226:18 227:24	88:19 108:24 109:3 largely 235:6 larger 138:5 Lasnik 192:7,8 lasted 55:22 lasting 134:25 135:5 late 49:3,23 224:23 latest 4:10 165:1 175:25 176:9 Latino 28:21 29:1,19 30:17 113:1 118:6,19 130:2 132:6,8 133:19,20,20 133:24 134:4,4 142:15 143:15 147:18 150:17 150:21 151:3,8 178:19 209:18 209:21 212:6 222:5,19 226:20 Latino/Hispanic 30:10 Latinos 31:2 122:2,22 147:14 148:25 Latinx 216:25 laughing 198:5 law 2:3 3:2,3 8:16 12:11 27:7 123:15 lawsuit 7:18 13:25 15:19 21:5 25:23 31:8,11 lawsuits 212:19 lawyer 12:2,2 16:8,22 92:3 169:10 lawyers 92:7,10 92:11,12,13,14	92:14 LD 4:21 5:16 226:23 227:16 lead 118:7,9,24 223:6 leader 5:7 100:21 183:17 183:25 231:6 leaders 173:9 leadership 53:18 193:22,24 leading 195:8 197:6 201:20 leads 50:5 235:20 lean 131:20,24 131:25 leaned 227:17 leaning 133:12 133:13 231:8 learn 147:7 learned 147:10 147:11 learning 211:24 leave 55:17,19 55:20 56:2,9 56:12,14,16,18 57:9 70:16 81:9 118:15 192:11 230:13 lecturing 126:1 127:5 led 65:7 66:4 223:9 Leeper 2:8 8:4 left 192:15 223:2 229:13 238:5 legal 2:7,9,21 7:14 8:4,5,6 32:19 85:15,23 86:3,6,14 88:4 88:21 89:6,19 92:16 97:21 130:8 133:2 145:11 181:13	181:14,23 212:8 215:7,16 235:11 236:6 237:6 legally 145:10 145:16,17,21 legislative 11:8 19:11 20:4,5 23:24 24:10 25:10 58:11 67:23 74:21 75:13,16,23 76:4,6,14 77:25 92:14 112:15 137:6 138:10 139:21 140:2 152:8 166:21 182:9 185:3 186:3,21 195:2 196:25 197:16,18 199:19 204:11 204:15,23 205:11 206:3,6 206:15 208:7 208:21 209:14 209:17 215:23 218:25 226:23 235:8 legislator 24:11 24:15 27:25 legislators 25:12 76:6 100:4 101:7 177:21 legislators' 99:11 legislature 16:2 16:8,21 18:14 18:20 20:21,25 24:4,6,9,18 25:4 27:20 37:4,5,23 92:3 92:11 99:18,24 100:1 112:12 112:16 237:12	Legislatures 90:8 214:16 let's 9:14 33:13 58:10 91:19 113:25 117:19 136:17 146:13 149:6,6 157:12 159:21 188:18 189:9,15 210:11 219:15 220:14 222:7 223:19 227:4 Letter 6:3 letting 125:25 level 73:15 215:23 Liaison 95:16 License 239:23 likelihood 168:15 liking 116:20 limit 72:12,12 line 124:23 149:11 156:10 164:19,20 191:11 240:5 lines 120:6 205:3 link 59:5,7 85:14 103:24 105:1,3,9,13 105:15 106:5 106:20 153:16 153:16 156:9 157:3,3 201:25 217:16 220:19 linked 114:15 161:4 Lisa 5:22,22 207:6 list 23:18 77:15 116:4 138:9 139:14 listed 42:17 240:4
--	---	---	---	---

litigation 3:10 7:17 11:5 13:23 18:1,7,9 18:10 21:10 31:15	56:20 72:1,3 76:5,10 79:6 83:11 133:22 143:7 160:25 162:11,14	96:6,7,9,10,13 96:23 97:1,4,7 97:10,15,20	management 67:10,14 68:9 68:17,23	166:16,17 167:8,11,16,17 167:19 174:2,7 174:14,22 175:5,8,10,12 175:14,17,25 176:9 180:4,10 182:8 195:19 198:3,8,18 199:6,25 200:11,12 201:25 202:1,2 202:3,8,19,21 202:24 203:1,3 203:8,16,17,19 204:16,17,23 205:4,8 206:3 207:14 208:2,7 208:12,15,21 232:12
litigation-spec... 17:14	looking 28:8 66:19 83:8 127:20 136:23 144:15 155:6 159:1,11 160:5 160:21 167:1 179:13 208:6 208:24 209:1 214:23 217:16 220:20 222:24	main 127:7 199:4 207:11	manner 213:16 239:10	map 4:16,19,24 5:5,13,15,16 11:15 39:13,16 40:10 52:9 58:10,22 59:7 59:18 61:12,25 62:2,3,7 64:18 64:22 69:1 70:4,5,7,9,11 70:12,14,14,16 70:19,20,23,24 71:1,10,15,23 71:24 73:13 76:3 78:5,8,10 85:14 86:7,14 99:19,21,21,22 100:7 106:9,18 107:16,24 108:1,5 110:10 110:25 111:4 111:11,22 114:14,15 115:5 126:6,13 128:12 133:14 138:10 144:1,2 144:3 148:15 150:16 153:19 153:21,23,24 154:2 157:2,4 157:11,13,19 157:21 158:15 158:20,25 159:9,21 160:6 160:21,24 161:9,9,13,16 161:19,20,21 161:23,25 162:1,5,6,9 164:10 165:3,5 165:10,15,19
little 28:9 33:13 34:22,24 50:1 57:24 62:25 117:20 141:10 146:15 160:10 163:1 171:1 227:6	looks 75:22 167:1 190:14 220:22	maintain 133:11 190:24	mapmaker 36:18 63:2	mapmaking 28:15 39:18 40:7 41:6 45:3 45:7 57:11,11 57:17 66:18 116:10
live 157:3	Los 2:16,22	major 187:5	maps 11:8,8,10 28:4,9,11 36:22 39:11,22 40:8,10,21,22 41:1,4,23,24 43:13 51:14,17 51:20 52:1,17 55:11 57:14,22 57:25 58:3,7,8 58:13,14,20 59:1,6,11,14 59:20,23 60:1	
load 106:21	losing 125:6	majority 5:6 32:24 33:7 48:16 100:21 108:6 109:22 112:13 114:16 117:8,11 118:20 129:19 130:2,2 132:7 132:8 133:20 133:20,25 134:5 138:23 141:7,13,19,21 141:24 142:10 143:10,13 144:13,20,23 150:17 153:24 154:2,17 157:15 178:19 179:7,13 180:4 180:22 181:5 183:1,17,24 208:24 209:18 209:18,21 210:1 211:20 215:5,14 216:6 216:25 223:7,7		
local 49:7	lot 17:15 25:15 99:8 140:14,21 151:17 155:6 190:4 234:2	makeup 132:25 226:23 236:2		
localized 142:25	loud 9:16	making 36:21 57:25 73:9 106:2 194:13 205:2,19,20 207:14 223:10		
located 137:8	lower 147:18 148:3 170:18 210:5 224:1	MALDEF 2:19 2:21 7:15 8:2		
long 196:12 201:13 211:12 225:4	Lowry 16:2	man 63:24		
look 12:3 39:10 46:17 60:11 71:25 72:25 73:2,3,5,9,18 73:22 76:17,23 76:23 83:7,16 83:17 84:3,10 85:12 93:1 104:25 105:2 116:4 122:17 127:22 155:10 155:12 157:12 160:10 163:23 164:15 165:13 165:14,20 166:10 178:8 182:8,8 187:2 188:1 190:15 198:3 200:9 202:2,3 208:25 219:4 227:4 234:5 236:21	Lowry's 16:11	managed 23:24		
looked 36:4	Lowy 16:8,10,20			
	lunch 9:25 110:1 110:4,6,7 113:21			
	Luther 22:1 33:14 34:18,18			
	M			
	M 1:22 7:8 211:8 229:16 239:22 240:23			
	M-A-C-B-A-I-N 96:8			
	M-O-O-N 218:1			
	MacBain 95:7			

Osta Davis

August 19, 2022

Page 260

60:14,17,18,22	231:15 234:20	77:24 83:10,22	meeting 5:3	82:15 95:21
61:2,10,11,13	235:16,25	88:20,24 93:3	47:18,20 65:4	99:2,6,9,10
61:14,17,20,21	237:11,12,15	95:2,24 98:1	78:17,24 79:1	100:22 131:12
62:8,24 63:5	marathon	99:21 106:10	79:3,22 86:13	135:20 170:9
64:11 66:18,19	210:16	106:11,25,25	86:17,19,23	171:10,11,12
66:19,19,24	march 164:9	112:8 113:14	87:12,16,21	171:17,18
67:4 72:2	214:3 215:12	117:7 125:24	88:2 89:8,9,22	186:6
76:20 81:7	219:16 224:2	128:10 129:15	90:3 94:24	Melissa 38:22
83:8,16,18	mark 104:1,3	140:11 141:21	95:4,23 98:20	member 5:7
84:11,21,22	124:16 152:11	142:21 144:20	100:20 101:13	37:14 38:10
85:2,7,10,23	159:4 160:18	144:24 145:8	101:17,24	64:10
88:5 89:6,21	169:22 176:15	157:10 174:19	102:1,4,6,18	members 41:25
90:16,18,23	182:22 197:21	177:18 181:9	102:19,20,24	44:14 49:9
91:5,7,11,19	225:4	199:25 214:9	102:24,25	63:5 84:20,21
99:17,24 100:2	marked 155:7	218:19 221:14	103:2 108:20	86:22 98:4,5,8
100:25 101:3	Marshall 3:17	221:19,22	109:7,10,14,16	98:10,12,22
102:13 103:11	Martin 22:1	226:22,24	110:3,9 119:8	99:17,24 100:1
103:14 110:21	33:14 34:18,18	228:20 237:20	119:18 120:1	108:12 110:5
118:13 120:18	material 103:4	237:24	125:5,8,14	136:8,10,13
121:2,4 124:12	215:25	means 106:14	126:2,10 129:8	171:13,21
127:23 128:21	materials 232:8	127:16 131:18	131:4,12,13	173:9 175:24
129:2,4,5	Matt 4:13 5:3,21	151:22 152:1	134:22,24	176:10 216:16
132:9,12,13	43:12,14,17	177:16,19	135:16,22	216:16
136:19,21	54:16 65:25	178:19 197:11	146:4 173:13	members' 25:18
137:24 138:2	110:17,22	204:4 238:1,3	173:16 175:22	memo 5:6,10,10
138:24 139:1	111:1,7 114:22	meant 42:11	185:11 194:13	93:5,10,12,13
141:14,16	114:25 119:12	44:11 106:12	212:3 216:4,7	93:14 120:11
142:17,20	125:5,14 126:3	107:2 131:14	216:9,11,14,18	182:25 183:4
143:16,19,22	126:5,24 127:2	175:13	231:18,19,22	183:15,16,19
148:4,6,9	128:2 130:22	media 47:10	meetings 13:24	183:21 185:7
151:25 152:2,8	131:7 134:23	medical 55:17	18:10 21:5,10	185:25 187:22
155:6 159:15	135:15 136:7	55:19,20 56:2	26:14 34:8	188:1 191:14
159:18 161:16	145:1,2,22	57:9 70:16	36:13 41:19,19	192:21 203:20
173:2,4,5,6,7	149:1 168:14	medication	41:22 42:4,8,9	203:21
174:8,15,16,21	173:9 219:17	12:19	42:11,14,15,16	memorandum
178:9 185:13	230:8	meet 14:3 35:21	42:17,21 45:11	183:23,25
186:3 187:12	maximum 72:17	48:7,18 49:15	45:12,22,24	184:2,12
193:24 195:4,4	72:17,21	49:17 53:6,9	46:3,10,14,23	memory 129:16
195:6,11	McLean 5:22	53:22 82:3	46:25 47:7	139:25 166:17
201:21 202:22	207:6	94:22 98:21	48:9,12,14,17	179:11 196:18
205:11,14	mean 17:21	99:1 101:24	49:11 50:18	mention 112:25
206:6,14,15,19	22:24 32:18	108:21 109:12	53:14 54:2,7,9	219:17
206:22 207:5	33:4 42:6,7,10	109:24 113:15	62:20,21 63:9	mentioned
207:10,22,25	42:15 60:6	171:6 173:9	63:12,14,16,19	17:10 24:23
229:25 230:4	61:4 72:6 73:1	185:22 216:15	63:20 82:8,11	25:22 33:13

Osta Davis

August 19, 2022

Page 261

34:17 37:6 44:10 47:22 53:5 54:20 60:12 63:8 64:24 72:24 73:25 75:10 76:1,17 83:7 84:2 88:18 89:16 93:16 103:9 107:6 108:4 112:21 116:8 127:12 139:12 141:5 146:16 180:20 196:7 199:17 200:13 212:1 229:22 230:9 231:13 mentioning 136:17 143:9 mentions 173:10 178:14 203:24 Merged 5:16 202:1 message 186:6 messages 20:8 20:11,20 21:11 21:18 186:8 messaging 20:20 met 35:19 49:4,7 49:8,10,19 86:12 94:15 100:10,14 101:1,4,11,14 108:22 173:10 metric 74:6,7,10 74:25 78:4,6,9 79:23 80:2 225:21 metrics 11:9 226:8 Mexican 2:21 7:14 Meyers 4:12,14 4:21 5:2,9,11	36:21,23 37:3 38:14 55:4,9 55:13 56:8,13 56:17,22,25 57:3,10,13,17 70:8,15,22 82:20 84:20 85:2,6 95:3,12 101:15 126:3 150:8 194:1 195:22 196:14 203:2 MGGG 5:19 214:18 217:17 218:3 mid 34:16 39:2,4 55:10 227:24 middle 10:4,4 187:15 218:10 midnight 201:14 204:3,6 midterm 116:1 mind 10:11 13:18 17:9 77:17 105:14 107:8 112:12 137:16 157:25 169:10 186:20 188:13 189:17 199:5,10 223:1 236:12 mindful 9:3,13 mine 234:4 minimum 25:2 minority 88:13 88:18 138:23 141:7,13,21 142:10 143:10 143:13 144:13 144:20,23 147:8 167:23 218:16 minute 238:4 minutes 49:23 183:9 189:10	189:21 190:7,8 210:11,23 229:11 238:10 misheard 110:11 139:13 mispronounci... 170:20 misremember... 141:7 missed 110:10 166:14 misspoke 190:19 misstates 37:10 37:15 79:10 108:9 116:2 117:14 123:4 127:17 160:24 161:18 162:8 misstating 17:12 139:13 140:5 misunderstood 130:4 mixed 225:13 moment 13:13 142:14 183:12 190:22 224:16 224:18 225:11 228:12 Montes 31:21 month 13:10 51:7 53:11 months 197:6 Moon 217:24 218:1 Morfin 3:2,3,3 8:7 morning 7:10 8:14,17 173:11 173:11,13 184:21,22,24 185:4 205:24 207:3,11 motions 239:17 motivated 79:17 move 175:20	220:14 221:2 224:24 227:23 moved 228:1 moving 165:25 221:25 Mulji 2:9 8:6 multi-county 209:5 multicounty 208:25 multiple 49:18 67:4,6 82:6 84:2 151:21 172:24 200:13 200:17,22 202:22 209:2,5 municipalities 77:5 <hr/> N <hr/> N 2:1 7:8,8 211:8,8 229:16 229:16 name 7:13 8:9 8:17 16:12,13 16:18 18:17 20:22 24:13 38:21,22 43:15 44:5,8 54:20 55:2 63:7 94:11 96:5 101:16 104:6 124:22 126:9 149:10 153:10 156:10 164:19 170:20 211:10 218:1,2 229:18 named 54:24 239:6 names 54:13,19 narrative 185:8 187:11 205:23 Nation 107:11 107:15 108:20 108:21 109:16	109:21 151:1 National 90:8 214:16 Native 218:14 naturally 56:21 72:8 73:12 nature 23:6 120:13 149:19 NCSL 214:16 near 227:7 nearly 40:2,8,8 necessarily 16:3 32:25 41:2 57:21 78:2 79:6 92:25 93:24 108:11 121:23 126:20 129:21 137:21 146:3 149:14 187:11 205:15 necessary 128:10 212:5 235:9 need 9:25 114:6 114:9 116:4 123:2 157:16 159:4 191:9 198:20 225:11 233:21 needed 86:14 121:2,2,4 130:1 180:4 223:6 needs 123:6 negotiate 80:11 80:18,19 130:8 145:10 181:22 negotiating 80:24 145:15 229:25 negotiation 100:24 127:22 127:25 145:13 235:9,15,20 negotiations
---	--	--	---	---

Osta Davis

August 19, 2022

Page 262

55:11 126:21 128:1,4,17 131:19 133:7 145:14 181:17 181:25 184:21 184:22,25 185:2,4,12,14 185:15 197:6 199:17 204:10 neither 92:24 93:18 195:6 never 123:14 152:17 new 4:21 61:12 70:1,1 night 26:1 147:23 Nodded 10:6 25:24 42:5 65:23 67:15 113:22 nodding 9:17 non-commissi... 37:19 non-district 138:19,20 non-Latinos 148:25 non-white 141:24 nonpartisan 17:4 27:23 41:1,22 44:22 44:24 59:25,25 60:12,16 62:22 63:9 220:11 nonprofit 26:21 normal 33:25 northwest 2:10 49:8 notable 99:14 noted 239:11 notice 238:7 noticed 233:1 noting 211:22	November 6:3,4 39:4,7 55:10 61:13 62:25 113:15 157:13 157:17,19,19 157:21 158:16 160:22 161:2 161:16,21,22 161:24 162:6,7 164:9 165:1,15 166:19 173:12 173:14 175:13 176:10 177:4 184:23,24 185:5,9 197:20 203:24 204:21 205:24 226:12 227:5 number 4:9 5:1 6:1 25:6,10 45:22 46:9 50:4 55:22 60:10 63:17 72:2,23 76:8 77:6 102:12,12 110:1,4 115:9 138:17 142:9 142:12 154:17 159:1 162:4 163:22 171:5 171:18 177:20 193:6 195:9 197:7 213:23 numbered 115:9 115:14,16,24 116:1 numbering 115:1 116:9,16 117:18 118:19 163:16 numbers 159:12 167:24 168:12 188:20 195:2 196:25 197:4 197:11	O O 7:8 211:8 229:16 O'Neil 4:23 5:7 5:12 54:15 65:20 97:8 101:14 126:3 136:14,15,17 182:25 183:16 183:21 184:2,5 184:11 192:21 193:1,16 194:1 194:16 195:21 196:22 198:12 203:21 204:19 205:24 206:6 206:13,16,19 206:25 O'Neil's 195:3 O-H-A-D 16:19 oath 7:5 12:9 oaths 239:5 object 9:6 10:18 17:7 77:23 147:15 157:17 159:17 160:23 161:11,17 175:7 202:20 202:23 206:23 215:4 222:14 234:5 objecting 10:15 objection 9:7 10:15 15:23 16:1 18:22 19:7,22 21:1 23:4 26:9 28:16 29:7,15 30:3,21 32:19 35:1 36:5 37:10,15 40:1 40:14,24 41:15 44:15,21 45:5 47:3 49:13 51:23 52:11,11	53:23 55:7 57:6,18,20 58:25 60:23,25 61:23 64:5,14 65:14 67:5 68:5 69:18 70:10 72:14 75:7 77:2 79:10 81:8,17 81:23 83:3 84:8,23 85:4 87:17 88:21 90:24 91:1 92:10 94:7 101:8 102:21 108:9 115:18 116:2 117:14 119:13 120:9 121:12 123:4 123:21 125:19 126:7 127:17 128:5,18 129:12 130:25 133:2,4,15,21 135:1 138:11 144:5 145:18 145:24 146:5 150:9 152:3 162:17 163:4 163:11,20 164:3 169:20 174:3 176:2 179:15 182:16 184:7,13 187:8 196:2 200:3 201:22 205:13 206:8 207:23 208:17 209:3 212:8 215:7,16 218:6 220:24 221:6,20 227:19 230:16 230:24 231:4 231:10,23 232:4,14,20	233:8,10 235:11 236:6 237:5 238:2 objections 10:13 239:9,17 objective 230:23 objects 225:2 observations 128:2 observed 22:1 obtaining 232:12 obvious 57:16 obviously 192:5 occasionally 20:22 156:2 occur 205:22 occurred 36:14 40:4 81:9 212:19 occurring 84:25 137:6 October 51:22 51:24 52:1,17 55:24,25 61:11 62:6 70:13,20 71:2 75:1 78:10 101:18 101:20 104:18 115:6 118:17 127:23 132:9 132:13 134:24 149:7 153:6,7 153:22,23,24 176:6 October-ish 51:9 odd 115:16,25 offer 185:25 187:6 offered 195:23 offers 186:2,5,24 187:5 193:12 193:14 194:13 194:20,21,24
--	---	---	---	--

Osta Davis

August 19, 2022

Page 263

office 1:19 8:7	26:23 27:1,9	68:16,22 69:2	109:24 110:4	155:2,14,24
8:11 67:10,14	27:13,21,23,25	69:7,10,13,24	110:10,15,19	156:3,8,15
86:18 87:3	28:3,8,19 29:3	70:4,9,19,22	110:25 111:8	157:12,16,18
88:3 89:9,23	29:10,14,17,19	70:24 71:5,9	112:4,21 113:3	157:22 158:20
212:2 218:16	29:24 30:1,6	71:13,19 72:16	113:9,16,19	159:11,19
officer 18:15	30:16,19 31:1	72:20,24 73:7	114:21,25	160:10,17
21:15	31:10,24 32:2	73:18,25 74:5	115:7,11,16,21	161:15 162:1,4
officer's 18:17	32:8 33:4,9,17	74:9,12,17	115:24 116:6,8	162:15,21,25
official 1:6	33:19,22 34:14	75:2,10,15,25	116:15,24	163:8 164:7,17
33:15 95:17	34:17,22 35:4	76:12,17,22	117:10,19,24	164:24 165:6
230:15	35:8,12,17,21	77:16,20 78:3	118:2,8,16,18	166:2,9,12,18
OFM 67:10 68:9	35:23 36:20,23	78:9,17,19,22	118:22 119:1,3	167:6,6,12,15
68:16,23	37:1,6,13,18	78:25 79:4,7	119:10,20,22	167:20 168:5
Oftentimes	37:21 38:2,17	79:16,19 80:4	120:12,15	168:24 169:1
142:23	38:25 39:3,8	80:12,15,20	121:15 122:4,7	169:12,21
oh 16:6,15 24:4	39:18 41:3,13	81:4,6,10,15	122:10,22	170:8,11,15,18
26:18 27:1	42:2,13,23	81:20 82:1,8	123:1,16 124:4	171:1,10,16,20
63:15 95:11	43:1,4,17,20	82:10,15,21,23	124:12 125:1	171:22 172:9
108:18 125:3	43:24 44:7,10	83:1,6,15 84:1	126:5,11 127:8	172:15,19,22
130:4 152:19	44:13,18 45:19	84:16,18 85:1	127:12 129:6	173:8,16 174:6
156:23 157:10	46:2,12,15,18	85:9,15 86:1	129:10,14	176:8,13,23
164:13 169:12	46:20 47:12,20	86:11,13,19,22	130:4 131:14	177:6,13 178:3
175:18 183:19	47:22 48:3,6	87:2,5,7,11,19	131:24 132:19	178:11,13,22
193:9 196:10	48:11,18 49:1	87:23 88:7,15	133:10,23	179:8,12,19
202:11,14	49:15,22,24	88:18 89:14,25	134:2,12,14,18	180:6,19 181:9
206:10 221:13	50:8,11,21	90:6,9,13,15	134:22 135:12	181:17 182:6
Ohad 16:2	51:2,10,19,22	91:6,10,14,16	136:6 137:10	182:21 183:6,9
okay 7:13,20,22	52:5,14,22	91:22,25 92:15	137:14,18	183:15,19
8:23 11:18,21	53:12,17 54:4	93:8,16,24	138:9 139:2,6	184:5,10,16
12:14,22,25	54:10,17 55:1	94:15,22 95:11	139:12,17,25	185:1,7,21,24
13:21,23,25	55:4,18,23	95:20 96:4,7,9	141:5 142:2,6	186:13,24
14:2,6,8,13,15	56:1,5,12,16	96:22 97:10,14	142:9,14,21	187:13 188:11
14:19,23 15:11	56:21 57:3,8	98:1,5,12,15	143:5,8,18	188:14 189:2
15:13,17 16:16	57:16,22,23	98:21 99:1,8	144:10,12,16	190:9 191:12
16:20 18:5,9	58:16,20 59:4	99:23 100:1,6	145:1 146:2,2	192:2,17
18:19 19:1,12	59:13,17,23	100:10,25	146:8 147:1,7	193:23 194:2,7
20:2,6,10,17	60:3,12,19,21	101:6,10 102:2	147:19,24	194:11,23
20:24 21:4,9	61:4,7,9,14,20	102:4,8,14,23	148:4,8,12,21	195:3,13,18,21
21:14,17,20	62:1,8,12,16	103:7,9,13,16	148:23 149:6	196:20,21
22:2,7,10,12	63:4,8,15 64:1	104:23 105:11	149:13,16	197:15,19
22:14,16,23	64:7,10,17,21	106:2,4,8,14	150:3,7,13,25	198:17,20
23:11,14,16,18	64:24 65:7,10	106:16,20	151:7,14,19	199:3,22 200:7
24:5,8,13,17	65:12,19 66:1	107:4,16,20	152:1,10,21	200:21,25
24:23 25:22	66:5,17 67:1	108:1,4,18	153:9,10,17,21	201:5,7,17,20
26:2,6,8,14,18	67:18,24 68:8	109:1,4,12,15	154:10,21	201:24 202:7

Osta Davis

August 19, 2022

Page 264

202:25 203:4,7 203:10,19 204:5,17 205:1 205:23 206:18 206:21 207:2,9 208:1,11,14,24 209:13,16,20 210:3,15 211:3 211:4,19 212:5 212:22 213:20 215:1,24 216:17,20 217:8 218:9 219:6,15 220:1 220:13 221:9 221:25 222:7 222:12,24 223:11,15,19 225:3,14,23 226:11,22 227:4,23 228:7 228:12,13,24 230:2,8,14,22 231:2,13,21 232:17 233:13 233:17 234:10 234:14,16,19 234:25 236:3 236:11,15,20 236:21 237:10 238:6,11,17 Okie 234:1 Oklahoma 224:14 once 36:1,15 40:9 48:24,25 53:11 68:21 94:18 155:12 191:8 192:16 207:16 one-for-one 181:15,19 182:3 OneAmerica 216:21,24	217:3 ones 18:13 33:20 84:14 115:10 open 13:24 18:10 21:5,10 42:18 46:25 86:17,19 88:1 89:8,21 103:25 105:1 106:4,20 153:15 156:8 157:23 158:8 165:12 198:2 199:6 201:24 212:3 234:2,4 234:8,15 236:20 opening 156:15 236:13 opinion 26:8 88:23 118:22 118:25 121:16 121:17 122:1 122:22 123:12 128:23 145:13 145:16,17 179:6,17,20,24 179:25 180:1,2 180:20,23,24 180:24 181:2,4 186:1 212:10 212:14 228:3 237:2,7 opinions 92:22 93:3,9 98:3 237:21 opportunity 11:22 112:23 169:20 239:8 opposed 10:18 options 160:9 ORAL 1:14 order 6:2 13:5,9 156:24 191:6 227:18 234:10 234:19	organization 171:25 172:3 231:8 organizations 53:19 172:5 organize 111:16 original 190:25 Osenbach 94:12 94:13,16,22 97:21 Osta 1:15 2:2 4:2,10,12,16 4:18,21 5:2,9 5:13,15,18 7:4 7:10,11,12 17:10 104:3,6 106:6 114:6 204:22 210:16 240:2,20 Osta.Davis@... 19:13 Othello 208:21 209:25 210:4 outburst 127:2 outcome 126:24 239:13 outreach 45:15 45:16,17,19,22 45:24 46:2,10 46:23,25 47:7 47:16 outset 81:1 outside 42:15 65:12,16 102:18,19,25 134:3 168:14 overlays 200:8 owns 192:1	198:12 210:13 210:13 223:2 226:12 227:5 238:20 Pacific 1:19 pack 112:20 page 2:25 4:2,25 5:25 8:25 156:21,22 157:6,7,11 161:3 186:2 193:1,4 196:21 196:21 203:20 203:23 204:18 205:23 221:10 221:14 222:1,7 222:8,10 225:16,23,24 234:14,25 240:5 pages 183:7 Palmer 1:3 2:6 7:16 18:1 240:20 panel 35:22,23 paragraph 218:10 235:3 part 63:6 82:1 82:15 87:14 108:4 112:15 118:18 150:15 163:6 165:19 167:7 170:18 171:14 172:12 175:9 185:23 186:12 197:10 201:21 205:6 217:16 219:12 220:19 225:22 participants 7:3 participate 45:3 203:7 231:22 particular 55:13 58:5 60:13 68:10 98:15	136:18 155:23 185:1 218:13 236:1 particularly 74:16 139:4 152:7 170:24 174:12 214:12 229:24 particulars 55:18 56:1 parties 7:22 10:17 80:14 191:19 239:9 239:12 partisan 180:9 180:13 181:16 181:20 228:6 229:23 231:3,6 236:2,4 partisanship 196:25 197:4,7 197:11 230:3 partners 171:5 party 13:25 180:16 236:25 237:8,12,18,23 239:11 Pasco 30:20,20 31:25 174:16 174:18 175:5 pass 136:21 192:18 passed 234:20 passion 145:5 paste 158:9 path 152:16,19 227:8 pattern 218:11 patterns 223:14 237:16 Paul 5:5 44:9 62:4,13,16,24 63:1 65:20 207:13,18,19 227:5,13
---	--	---	---	--

Osta Davis

August 19, 2022

Page 265

pause 169:18 203:14 PDF 162:2 225:8 Pedersen 100:20 Pediatrician 14:20 Pellicciotti 225:19 penalty 11:24 pending 166:6 people 26:21 28:23 38:15,18 42:15 47:2 50:4 53:14,16 53:17 54:18 65:9 108:23 109:2 146:19 146:23 151:10 151:12,15 203:22 perceive 113:6 136:2 perceived 99:13 135:6 226:18 percent 40:3 66:22,24 92:25 106:23,24 110:12 131:23 132:1 153:25 154:3 158:21 162:6 166:23 166:24 168:7 168:10,17,21 178:17,24 179:1 180:11 182:10 194:3 202:5 203:5,5 225:19 227:2,3 percentage 33:23,24 66:17 66:20 179:21 222:4,5,19 perception 122:14 123:14 135:4	perfect 196:18 performance 72:2,25 73:2,3 73:5,10 74:2 74:15,21 76:7 76:14 79:23 131:22 132:17 132:23,25 133:8 138:6 163:14,23 164:1,4 180:10 180:13,15,17 181:7,16,20 186:15,16 187:2,11 197:13 204:10 208:6 222:21 229:23 performs 212:6 periodically 16:2 perjury 11:25 person 7:25 14:3 43:11 44:2 45:25 54:24 65:2 78:14 100:7 109:7,9 114:22 148:17 185:11 194:18 194:20 personal 19:20 20:14,16,17 21:6 28:7,17 41:10 135:22 136:4,6,11,16 145:12 211:16 212:10,13 230:19 personally 29:4 61:24 62:8 72:12 78:23 116:10 176:8 193:21 perspective 127:25	pertains 88:5 phone 14:3 20:14,16,17,19 20:22 21:11 phrased 209:8 physical 11:23 70:11 piece 202:13 pin 51:11 PL 160:1 place 211:4 plaintiffs 1:4 2:6 2:13,19 3:2 7:16 plaintiffs' 8:1 12:2 plan 5:11 56:7 85:16 198:18 236:24 planned 56:2,4 platform 28:12 39:13,16 40:3 41:6 59:2 platforms 20:18 39:23 40:12 play 112:14 138:18 226:23 played 211:14 playing 28:10 please 9:9,20 10:20 13:16 97:23 103:19 152:15 216:8 221:9 223:20 226:15 PLLC 3:3 PM 5:16 point 9:24 35:15 125:14 167:22 174:9 180:9,13 181:6,17 183:10 186:1 193:1,8,14 195:21 196:22 197:7 203:23	204:18 206:9 207:4 214:19 215:1,11 219:21 220:12 228:7 pointed 32:16 50:24 213:1,19 pointing 224:13 points 50:18 197:9 polarization 218:12 polarized 32:17 32:18,22 88:11 107:21,23 123:8 143:21 143:25 208:11 208:15 212:11 212:16,18,23 213:5 214:13 215:20 218:23 221:23 223:4 Policy 27:22 170:3 political 80:14 111:23,24 112:7 133:8 138:6 163:14 163:23 164:4 186:15 187:10 197:12 208:6 232:13 235:6 236:25 237:8 237:16,23 politics 22:17,24 poorly 209:8 population 30:10,16,22 67:11,20 68:2 68:9,16,17,23 71:25 72:5,8 72:10,18,21 77:25 83:22,23 84:5,6 88:11 88:18 89:1	107:18 121:5 140:15 141:24 141:25 142:2,3 142:5,6,7 144:15,16,17 150:18,22 159:12 160:7 160:12 163:14 200:18 222:6 222:17,19 226:10,20 227:1 228:9 population-wise 78:1 populations 147:18 posed 219:1 position 23:22 27:23 35:8,9 41:13 60:19 95:15 190:25 192:3 positions 24:8 possible 4:11 88:25 107:12 165:18 200:19 219:14 post 41:1 51:25 61:2 71:12 posted 51:14,17 51:20 61:21 70:4,19 108:2 127:24 132:14 152:16 176:5 posting 36:12 71:8 postings 37:7 potential 63:18 potentially 125:25 180:4 194:1 practice 20:3 27:12 pre-conditions 123:8 212:11
---	---	--	---	--

Osta Davis

August 19, 2022

Page 266

precinct 175:19 222:18,20	presented 100:6 119:8 130:7,19 172:16	83:11 99:16 100:24 102:6 115:19 118:14	private 50:6 privilege 9:10 85:19 190:13	191:3 production 15:14,18
precincts 163:15 167:3,7	presenters 214:17	122:19 131:13 133:8 136:15	190:18,21 191:14,21,24	149:19 161:5 190:21 192:4
prefer 7:11	presenting 102:7 178:24	170:14 182:3 186:15 187:4	192:1,3 privileged 105:25 169:25	Professor 217:24
preferences 234:7	preserve 9:6	primary 36:17 39:11,13,16	190:14 192:3 probably 10:1	program 40:22 59:11,21,24
preferred 40:19	preset 60:10 73:12 85:8	41:6 63:2 80:24 140:19	34:13 54:8 210:23,24	60:4,8 progressive 172:5
preparation 15:6 239:18	president 112:11	160:2,4 principle 237:4	211:2 229:11 238:9	Project 2:13,15 8:3
prepare 14:2,5 15:4 26:15	presidential 73:15,17,20	printout 5:21 105:2 165:8	proceedings 7:2 169:18	promise 169:1 prompted 214:20
183:25 184:6 184:11 202:8	115:14,25 116:21 117:13	176:24 prior 28:3 29:21	process 9:4 10:8 26:22 31:14	proof 31:12 Prop 5:14 198:9
prepared 11:22 12:22 70:15	208:9 press 47:8 207:3	31:18 71:8 75:2 79:1 80:1	32:9 34:24 39:21,22,25	proportion 112:16
183:22 184:3 239:18	207:8 presumably 204:20	80:5 147:24 205:8 212:20	45:4 50:14 57:24 58:3	proportional 112:14
preparing 41:19 202:18	presume 47:23 109:6	214:16 priorities 77:6	62:17 67:13 68:18 69:25	proposal 4:19 4:23 5:5,13
presence 32:17 215:19 218:22	pretty 200:4 216:24	111:10,14 113:3,6,9,11	76:24 80:21 81:2 96:24	150:16 157:13 158:13,16
present 49:21 65:8 79:21	prevent 12:17 previous 13:15	113:16 117:17 117:18,20,21	97:2,5,8,11 98:3 110:16	165:1 178:4,23 180:25 182:6
87:12,16,20,21 94:25 95:2,4,5	13:17 22:4 31:15 139:1	117:23 118:2 118:18 130:10	111:10,19,20 113:4,7,10,17	182:11,14 187:12
97:20 99:5 119:20 120:20	141:16 151:25 previously 111:21 125:24	133:11 138:19 138:20 141:6	143:19 148:5 155:18 170:6	proposals 172:13 195:5,7
121:18 123:9 125:5 126:2	183:8 195:11 213:18	150:13 171:4 230:6,7 235:23	171:8 183:3 205:22 210:4	195:9,10,14 196:4,6,14
131:4 173:13 185:21 186:11	primarily 20:20 26:24 27:5	235:24 prioritizing 126:18	223:17 224:11 230:9 235:15	204:23 proposals' 205:3
194:4,7 196:1 196:3	33:21,22 38:6 38:9 40:19	priority 107:15 112:17,22	235:17 processes 11:9	proposed 102:13 121:4 126:6
presentation 78:19 86:25	43:12 47:4 49:2,20 51:1	113:1 116:13 138:9,10	40:7 produce 17:6	150:25 173:4 173:25 174:14
87:7 88:1 101:19,20	54:15 55:9 59:1 62:22	139:14 140:6 140:11 150:19	136:20 produced 58:7	175:25 176:9 178:16,25
102:9,16,17 106:13,18	63:17 65:2 67:11 70:23	150:20 151:4 162:18,21,22	73:12 120:14 188:15,20,24	179:21,22 180:8
107:3 108:11 119:12 123:23	74:3 80:17	162:25 163:2	190:19,20	

Osta Davis

August 19, 2022

Page 267

protective 191:6	187:13	questions 9:2,5	218:25 228:9	236:22 240:2
provide 20:21	pulled 175:14	9:12 12:22	racial 32:23	reading 26:15
170:12 172:4,7	purely 146:21	38:13 103:5,7	33:2,7 66:10	101:22 147:22
172:9 219:13	purposely	103:17 104:3	66:14 83:13	216:3
provided 64:2	236:24 237:8	150:3 155:11	218:11	ready 114:4
85:13 133:22	purposes 10:13	166:14 169:6	racially 32:17	210:14
156:2 172:13	28:20 227:7	169:13 170:1	32:18,22 88:11	real 10:11
192:14 231:14	pursuant 183:22	184:17 188:1	107:21,23	reality 111:23
provides 25:17	239:4,18	189:21,23	123:8 143:21	112:7
59:3	pursuing 136:4	190:2 191:5,6	143:25 208:11	really 117:5
providing 92:16	pushed 121:22	191:14 208:2	208:14 212:11	200:9
97:21 99:20	pushing 52:6,15	210:10,16,17	212:16,18,23	reason 9:19 10:2
pry 14:15	put 90:7 104:12	210:18,21,23	213:4 215:20	55:13,16 61:18
public 2:16	108:8 120:2	228:15,25	218:23 221:23	79:7,8 85:18
13:24 18:10,15	125:4 152:14	229:3,10,21	223:4	91:6 98:19
21:5,10,14	155:11 164:13	235:7 239:16	radar 220:2	114:21 149:18
40:22 41:19,20	165:19 175:3	quick 211:12	224:7,9	184:11 206:18
41:25 42:4,9	183:20 188:21	quickly 200:9	raise 219:20	206:21 209:10
42:16 45:15,16	201:10,11	quite 37:23	raised 127:21	209:13 240:5
45:17,19,22,24	220:1,19	127:22 130:7	raises 235:3,6	reasons 223:15
46:2,10,23,25	putting 119:5	quote 128:16	raising 220:5	Rebalanced
47:6,16 48:7	187:24 224:17	165:1 168:8	ran 123:25	5:14 198:10
50:18 51:14,14		186:18	208:14	recall 15:22 18:9
51:17,20 52:1	Q		rapidly 228:4	21:8 25:25
62:20 71:8	qualifications	R	rate 147:17	26:4 29:16
86:17,19,22	239:10	R 2:1 5:13,14	210:5	31:18 32:1,15
88:1 89:8,22	question 9:8,9	198:9,17,18	rates 143:16,19	34:14 36:23
110:21 140:14	9:11,18,19,21	239:1	147:8,12,14,20	38:25 41:9
140:22,24	10:3,17 13:1,4	R.W 3:8	147:25 148:2,6	45:7 46:5
141:2 142:23	13:7 34:5	race 22:25 23:2	148:9,24	47:20 48:22
142:24 143:1,2	79:19 85:18,19	23:2,5 33:1	RCW 239:4	49:4,11,14
151:2,7 163:6	86:9 87:14,25	73:6,8 74:1,1	RDR 1:22	50:16,17 51:7
191:3 205:21	89:11,15 92:18	74:14,19,20,24	239:22 240:23	52:5,8,13,14
212:3 232:7	103:1 105:5	75:5,12,22	re-post 152:16	52:18 53:9,20
publicly 61:2	114:12 120:15	76:10,13 78:4	reach 168:18	54:10 55:1,19
70:4 78:11	130:12,16	78:4,23 79:8	reached 47:11	58:19 59:16
102:3 108:2	154:5,14,16	79:23 88:17	74:18	61:6,10,19
132:14 176:5	155:14 156:18	127:9 147:12	reaching 218:16	64:6,7,16,19
publish 41:4	166:6 183:15	197:14 208:8	read 7:21 16:3	64:25 65:8,17
published	191:23 209:8,9	208:10 229:24	25:22,25 26:2	65:24 66:4,11
217:20 231:15	215:9 219:1	230:3	32:13 104:10	66:12,16 67:7
pull 18:12 99:19	225:25 226:5	races 73:9,11,14	130:13,14,16	69:2,9,19,20
104:20 105:12	238:5	73:16,16 75:13	141:9 155:13	69:22,24 70:2
114:10,11	questioning	75:16 76:5	160:14 183:6	71:9 73:14
158:10 175:1	17:22 191:11	217:5 218:24	216:2 235:4	75:24,25 77:8

Osta Davis

August 19, 2022

Page 268

78:9,12,13	173:4,6 174:1	95:3 98:2	13:22 18:6	174:14 175:2
81:4 84:14,16	174:6,11,13	119:7 121:1,21	19:1,3,6,9,10	175:23,24
85:25 86:2,11	177:3,6,9	128:8 129:1	19:17,18,21	176:10 183:2
86:13,16,25	180:19,23	142:4 148:18	20:6,7,12,19	184:22 201:25
87:2,5,7,11,15	181:2 185:6	159:6 162:19	21:7,21 22:4	210:3 211:15
87:18,23 88:3	186:17 194:23	172:11 179:4	24:7,19,20	212:20 214:7
88:7 90:11	196:4 197:2	179:17 181:3	28:3,11 29:21	214:12,15,21
94:15,21 96:2	198:22,24	181:11,21	30:12 31:14,19	216:5,10
97:14 99:5,20	199:1 200:24	185:10 187:9	32:9 33:16	219:25 224:14
100:17,20	201:19 202:8	194:15,25	35:9 36:10,13	224:14 228:2
101:17,20,22	202:18,24	196:17 200:4	36:14 37:22	230:9 235:3,6
102:4,8,10,10	203:6,8,18	203:2 207:7,19	38:20 39:17	Redistricting's
102:22,24	204:24 206:12	213:17 214:11	40:2,6,9,18	160:14
103:5,8 104:9	209:12,15,16	220:9	41:5,7,10,14	redrawing 107:6
106:5,16 107:7	209:20,24	recommend	42:12,14,18	107:9,16 108:5
108:19 111:6	211:19,22,24	192:7	44:25 45:21	redrew 107:2,4
116:19,20	213:11,14	reconcile 204:23	49:9,12,19,24	reduce 77:4
117:22 118:2,4	218:17 220:8	reconciliation	50:1,14,23	reduced 239:7
118:8,14,25	228:7,11	205:22	51:3 52:6 53:4	reelection 101:6
120:23 121:20	receipt 66:23	reconciliations	53:15,21 55:6	refer 17:8 29:24
121:25 122:6	receive 18:2,5	207:14	55:14 56:10	136:10 198:18
122:18 125:1	20:11 60:2	reconciling	58:3,7 59:2,6	217:17
126:4,20,24	71:15 85:15	205:14	59:14 60:10	reference 17:14
127:3 128:7	171:3 183:24	record 9:4,7,15	62:17,21 63:9	67:13 126:12
129:6 131:16	206:4	10:11,14 12:16	63:19 65:18	151:24 227:13
132:5,6,8,17	received 11:13	52:24 53:2	68:25 69:25	referenced
137:5,6,14,18	20:1,22 34:12	113:24 114:1,2	71:3 73:4,11	123:23 152:6
138:13,22	34:14 36:15	114:5 146:14	80:21 81:2	214:18
139:6,11,17	64:20 66:21	169:17 188:25	83:12 84:2	referencing
141:12 142:13	67:1 68:21	189:4,6,9,12	85:7,16 96:11	112:10 128:8
143:2 144:10	69:11 187:16	189:13,16	96:14,24 97:2	168:11
144:21,22	206:2	210:11,15	97:5,8,11,15	referring 29:11
145:6,9 149:13	receiving 86:16	211:7 238:15	98:6 103:24	29:25 42:17
149:14,25	125:1 164:22	239:9	105:1 106:5	93:10,11
150:2,5 151:7	177:3,6,9	recorded 11:19	111:10 113:4,7	116:25 136:7,8
151:10,12	194:19 196:4	records 15:22	113:10,17	154:7 159:2
153:13,19	receptive 122:15	15:25 17:5,8	114:14 140:25	167:25 175:11
154:21 155:1	recipient 124:23	17:11,16 18:3	148:5 153:16	178:15 180:12
156:12 159:8	recognize 214:1	18:6,15,15	155:15,16,18	193:21 220:3
160:9 161:6,15	217:18 223:24	21:5,9,14	156:2,9,16	reflect 27:11
163:21 164:22	recollection	191:4	165:14 166:21	112:12 205:8
165:3 166:5,16	19:19,25 40:7	recurring 53:6	170:3,5 171:8	reflected 74:21
170:16 171:11	42:25 48:2	redistricting 5:8	171:14,19	111:23 237:15
171:12,16	50:25 57:7	5:10,11 6:3,6	172:10,12	regarding 6:2
172:17,22	76:5 93:7,12	10:8 11:13	173:24 174:2,7	10:17 18:6,10

Osta Davis

August 19, 2022

Page 269

19:2 92:23	reject 196:15	91:13,18,21,22	101:21,22,25	7:16 14:21
93:6 94:3,9	relate 237:16	93:14,23,24	107:7 168:22	49:16
128:25 133:7	related 15:15,19	94:2,8,24 95:4	216:21 217:15	Republican
142:4 143:3	21:7 22:19,21	95:20 97:17	217:17,18,21	100:13 133:12
151:2,7 160:24	22:23,25 32:12	100:4,5 101:16	217:22 218:4	133:13 163:19
161:18 162:9	44:4 75:12,16	102:6 103:1,7	219:9 220:18	178:23 179:20
165:1 171:4	75:22 107:10	107:10 109:14	222:25 223:12	180:17 181:7
173:8 181:6	128:21 133:18	110:7,7,9	reported 1:22	196:24 197:3
182:19 187:10	180:18 197:13	111:14 119:18	38:18 56:24	198:18 227:7
195:14,17	208:7 218:23	119:22,25	164:5 240:23	227:17 231:7,8
196:7,15 206:3	relates 31:12	122:25 125:11	reporter 1:23	231:21
209:20,24	163:24 216:5	125:14 126:10	9:14 12:9,14	Republicans
214:12 235:25	relation 15:24	127:7 129:9	32:3 112:5	79:13 180:11
regards 21:9	21:4 141:23	139:2 141:2	113:24 130:13	232:8,18
172:13 181:20	relationship	143:14 144:8	141:11 155:3	request 15:25
194:25 200:2	135:9	144:11 147:22	164:11 169:3	17:14 21:5,9
region 29:22,24	relative 73:5	151:13,14,15	169:23 176:22	32:3 58:14
30:2,9 31:2,16	228:9 239:11	151:16 154:23	187:18 189:1,5	64:18 183:22
47:16 51:4,6	239:12	154:24 172:24	190:7 197:22	183:24 191:4,5
58:5 100:15	relayed 193:16	173:1,19	201:4,8 203:13	217:25 224:5
102:15 118:5	194:17,21	174:16 176:12	213:24 217:25	227:10
126:15 137:12	release 40:21	181:3 183:11	220:16 227:10	requested 60:1
140:4,22 163:7	52:9 67:18,19	186:13 198:15	233:15 236:14	60:16 184:11
172:20,23	67:20 68:2	201:15,18	239:4,22	231:18
173:25 181:14	81:7 102:7	208:6 211:17	reporting 1:22	requesting
185:3 195:14	110:20 173:2	216:9,17	56:23 240:23	170:16 224:4
199:9,19 200:2	released 51:14	remembering	represent 7:24	requests 15:14
212:12 217:7	52:16 61:12	139:25	7:25 8:10,16	15:18 17:6,8
regions 45:23	68:14 70:12,14	remote 104:24	149:21 161:3	17:15 18:2,5
47:2,5	71:1 78:10	177:1 224:19	187:21 191:18	172:24
register 146:19	93:5 101:19,25	225:2	217:14 234:19	require 121:23
146:24	102:3 108:2	Renton 139:4	representation	215:5,14
Registered 1:23	115:6,10	reoccurring	112:14 237:17	228:18
239:22	120:11 132:14	49:20	237:21	required 41:2
registration	releases 47:8	reopen 175:15	representative	68:25 78:2
26:25 146:17	relevant 219:13	191:7,13	1:11 65:7 66:9	130:6,23 131:5
146:22 147:3,5	relied 67:19	repeat 87:25	98:17 100:2	145:11,16,17
147:8,12,14,17	remember 13:9	89:15 215:9	199:2	145:21 179:6
147:20,25	13:14 21:15,23	226:4	representatives	205:15
148:6,9,14,24	23:9,10 27:14	rephrase 13:2	53:18 111:17	requirement
149:3 217:4	35:24 44:5,7	61:15 78:7	171:6	181:23
regroup 238:10	54:18 62:10	replacement	represented	requirements
regular 53:6	63:7 66:3 67:9	56:14	53:14 180:15	85:16,23 86:3
57:4 63:8	69:13 78:16	report 38:6	190:14	86:7,14 87:23
regularly 82:11	80:3,6 83:14	56:22,25	representing	88:4 89:3,6,20

Osta Davis

August 19, 2022

Page 270

90:1 91:8 130:9,21 145:12 228:17 requires 236:4 research 214:14 214:21 215:18 219:22 researching 214:6,9,11 228:17 resembled 200:5 Reservation 107:11 108:6 109:13,22 114:19 151:1 Reservations 143:7 reserve 189:24 191:7,22 238:14,16 reserved 238:21 residents 143:2 Residing 239:24 resolve 166:18 191:8,14 resolved 192:6 192:16 resource 223:17 resources 36:11 38:12 230:20 respect 135:7 respected 88:25 111:24 respective 38:11 65:3,16 respond 20:4 122:13 127:1 203:17 responding 10:3 127:3 responds 150:16 151:1 225:24 response 13:15 13:17 17:5 191:3	responses 9:15 11:18 responsibility 181:13,14 219:13 responsive 143:1 rest 111:4 130:12 140:18 restate 215:9 restated 203:25 204:4 result 85:19 results 60:9,10 76:4,6 116:5 180:18 résumé 35:2 retain 111:4 retained 14:25 14:25 230:12 230:20,22 231:5,8 232:11 retaining 220:11 retention 18:16 return 192:20 211:13 returned 55:23 55:25 56:16 57:1,9 206:1 revealed 127:24 review 11:22 15:6 206:3 239:8 reviewing 228:7 REYES 2:15 right 13:17 17:17 18:1 30:7 37:13,18 37:24 46:18 51:6,22 52:24 53:1 54:21 58:17,24 63:10 68:16 73:14,25 82:13 104:15 105:19 113:23	114:16,19,23 115:21 117:4 132:16 139:15 142:7 146:17 155:5 157:11 158:21 160:5,5 160:6 164:9,15 165:14 169:2 175:18 176:19 182:21 187:25 191:7,17 193:9 203:20 205:23 220:15,22 234:8 rights 2:13,15 8:3 31:16 87:8 87:10,24 88:4 89:3,5,18,20 90:2,10,18,23 91:8,11,20,23 92:20,23 93:4 93:10 94:3,9 97:12 106:14 120:17 121:18 121:22 122:5,8 123:3,7 125:9 126:22 128:9 129:18 145:4,8 150:15 170:13 182:15,20 211:23 219:2,4 228:17 238:14 238:16 Roger 199:2 role 25:16 36:10 38:8 39:10 44:3 45:9 95:16 136:3 185:14,15 roles 36:12 41:13 room 7:22 71:22 109:3 193:2,12 194:4 201:17 207:12,13	226:22 227:6 roughly 49:7 89:1 148:2 195:10 round 30:11 110:21 228:1 Ruble 95:14 rule 88:25 rules 8:25 run 123:22 134:11 208:2 208:11 running 34:12 49:3 133:25 134:4 224:11 <hr/> S S 2:1 4:8 safe 122:21 131:8,14,17,20 131:21 133:12 133:12 Sarah 5:22 220:3 224:2 Sarah's 220:1 saved 202:22 saw 44:2 saying 17:9 92:11,12 112:9 121:25 122:25 140:6 151:10 151:16 226:15 says 9:9 12:15 125:6 145:3 150:14,15,25 151:19 177:13 178:18 180:8 180:12 182:9 186:2 202:3 218:11 227:5 235:6 scheduled 45:20 98:20 173:17 173:17 scheduling 5:3	47:25 49:3 173:8 216:13 school 22:10,11 27:6 67:23 scratch 150:2,4 221:11 screen 21:17 104:25 114:12 149:23 155:4 158:6 160:16 164:17 165:12 165:13,19 167:2 168:25 175:3 198:3 201:1,2,11 203:12,15,19 226:16 233:20 233:22 234:5 scrolling 199:11 SDC 5:7 193:1 193:11 seal 191:6 search 18:15 searches 15:13 15:17 21:6,11 36:12 seat 116:20,21 116:24 117:1,7 122:21 SeaTac 23:15,23 25:2 147:4 seated 110:8 seats 115:13,14 115:20,22,23 117:2,2 133:12 133:12,13,13 Seattle 2:4 3:11 77:11 147:3 239:24 sec 202:7 234:6 second 24:17 38:14 161:3 164:8 169:16 173:2 192:25 193:7 194:4
---	---	--	--	---

Osta Davis

August 19, 2022

Page 271

196:20 203:14 220:19 221:14 222:1 225:24 Secretary 1:6 section 6:6 153:11 236:18 236:23 sections 150:14 see 9:14 50:14 73:12 91:11 104:17 111:11 149:6 158:6 163:21 183:11 188:18 195:4,6 198:9 199:11 205:21 214:7 216:22 219:18 224:12 226:1 226:13 233:24 seeing 105:21,24 162:19 166:20 202:6,13 seen 175:25 176:4 183:4 195:9 202:21 234:17 segues 213:20 select 110:1,4 senate 5:6 18:21 24:1 25:5,6,11 97:25 98:4,22 108:13,15,17 115:13,22 116:13,21,24 117:1,7,12 170:4 183:1,17 183:24 230:20 Senator 100:13 100:13,20 senators 25:13 25:18 100:11 100:17 101:1,4 send 19:2 20:11 21:14,18 39:24 40:10 58:11,15	58:17 59:1,7 60:14 61:14,18 61:24 62:8 64:11,12,18,19 149:10 165:15 176:9,20,23 177:2 198:13 206:6,18,22 207:16,17 224:1 sending 58:23 104:9 106:5 111:1,1 149:13 149:14 153:13 156:12 161:6 167:18 198:15 201:15,20 206:12 215:24 216:1 226:17 sends 16:3 Senior 95:16 170:3 sense 9:22,23 11:7 32:16 37:25 38:2 58:21 68:13 73:18 75:1 78:7 111:8 129:16 131:7 145:11,13 152:7 187:11 193:20 212:10 215:20 216:2 218:24 220:2 222:16 226:16 226:25,25 230:5 sent 21:15,16 35:2 47:9 60:18,22 61:11 61:13,20 62:2 62:3,7 71:16 84:21 111:7 149:7 153:22 153:23 156:14	158:16,18 160:22 161:1 161:20,21,23 162:1,5,6 164:25 167:10 171:22 175:9 177:7,10 182:13 183:16 187:16 188:4 198:12 200:6 201:14 202:3 203:16 206:14 207:1,18,19 213:17 214:3 215:2 216:3 219:16 sentence 183:19 183:21 194:16 204:25 205:1 227:24 235:2,4 236:22 sentences 205:1 sentiment 121:25 151:13 sentiments 140:25 separately 10:18 Sepe 3:8 8:12 September 51:15,20 52:9 55:21,24 70:5 70:16 81:7 118:13 121:3 serve 113:11 served 17:18 45:11,13 session 217:23 sessions 41:20 set 7:3 38:5,8 51:17 67:2,3 69:8,15 70:1 77:3 84:4 156:21 230:6,7 239:19 sets 67:4,6,7	84:2,7,11 settled 212:20 seven 34:11 174:24 204:19 shading 66:11 66:14 shaking 9:16 share 71:5,13 100:25 104:24 104:25 114:12 140:9 149:24 158:6 161:2 164:17 165:13 175:3 198:3 201:11 213:4 213:12 233:21 shared 56:19 71:10,11 100:2 101:3 117:18 124:10,12 161:4 213:15 sharing 203:19 212:14 233:19 Sharon 98:18 sheet 170:19 240:1 shift 180:9,13,15 180:17 233:5,5 233:7,12 shifted 83:21,22 shifting 182:4 shifts 233:1 short 227:18 shortly 8:13 33:14 shot 155:4 160:16 168:25 201:1,3 203:12 203:15 shots 21:17 shotting 165:12 226:16 show 98:20 99:17 showed 99:23	showing 105:14 158:9 222:21 shows 166:22 167:21,22 168:19 202:4 222:18 side 160:6 193:13 sign 11:24 239:8 signature 238:16,21 240:18 significance 218:21,22 significant 14:14,16,19 significantly 30:11,13 140:16 167:23 168:16,16 174:7 signing 146:19 146:23 239:9 similar 25:20 33:8 108:13,15 133:11 140:9 211:2 similarly 30:23 44:22 85:6,12 172:11 Simone 2:8 8:4 Simple 9:11 simply 13:8 Sims 4:10,12,14 4:16,18,20,22 5:2,5,9,15,17 33:21 34:1,7 35:7,13,14,17 36:11,18 38:17 38:20 41:18 42:4 43:8 47:23 48:1,6 48:19,20 49:5 49:6,16,17,20 51:13 52:3,16
---	---	---	---	--

Osta Davis

August 19, 2022

Page 272

53:5 56:9,23 56:24 57:1,2 58:1,12,15,16 58:24 59:8,13 59:20 61:12 64:12 70:5,15 70:19 71:1,16 72:16 74:8,14 74:17,23 75:3 75:4,21 78:11 78:15 79:1,2 79:22 80:17 81:15,21 82:2 82:16 85:10,12 86:5 87:21 91:16,18,23 92:19 93:9,17 94:5 95:25 96:1 97:2 99:3 99:4,5,23 100:6,14 101:3 101:15 108:2 109:9 111:2,9 112:9,17,21 115:6,9 116:15 117:10,16,24 118:3,8,22 119:4,11 120:16 121:1 122:10,15 123:25 125:15 125:23 126:17 126:20 127:1,9 127:12,21 128:14,19,24 129:8,17,23,25 130:5,7,17 131:4 132:14 133:6 134:15 134:18 135:5 135:10,14 138:9,17,22 139:13 140:7 141:12,18 142:9,25 143:9	144:12 145:3,7 145:9 150:1,7 150:19 151:4 153:6 154:20 159:7,9 164:25 165:4 167:10 167:17 168:8 168:19 175:14 175:25 176:5,9 177:8 178:22 179:10,22 180:19,23 181:11,18,21 182:7,13,18 185:16,21 186:4,13 193:16 194:8 194:13 195:22 195:24 196:4 196:15,23 199:23 200:21 201:14,18 203:16 205:17 205:18 206:14 206:22 213:8 213:16 214:4 215:25 216:10 219:8,14,16,21 223:12 225:22 226:18 235:23 237:14 Sims' 141:5 173:1 179:23 181:4 237:11 Sims's 48:3 150:16 166:19 166:24 167:20 182:11 single 69:8,15,21 situation 25:20 86:2 127:4 179:24 181:15 229:12 six 34:10 204:19 size 222:17	skim 183:12 skip 222:7 SLeeper@Ca... 2:11 slide 102:7 221:10,11,12 221:13,18,25 222:1,3,10 226:17 slides 5:21 119:9 222:8,9 slight 72:10 195:12 slightly 56:20 small 96:15 smaller 10:1 social 47:9 software 39:12 39:13 40:5 63:21,23 66:6 66:7,11,14,15 207:15 solely 196:25 197:3 soliciting 45:22 solid 168:5,9,20 180:2 somewhat 12:8 Sonni 2:14 8:2 Sonni@UCL... 2:17 soon 105:19 113:21 sophisticated 60:4,6 228:19 228:22 sorry 11:2 19:3 20:10 22:24 26:19 27:7 28:13 31:10 33:12 34:22 40:21 42:13 45:16 47:12,24 49:10,24 50:12 51:5,19,24	53:12 57:4 59:19 60:15 61:15 66:14 67:2 70:13,24 71:14 75:10,20 76:16 78:7 79:20 81:11 84:1 86:3,5 87:14 89:4,17 89:18 90:16,21 92:9 94:4 95:1 95:6,12 96:4 98:12 103:23 104:15 107:5 107:20 108:14 108:19 109:6 110:10 114:21 120:15 130:4 132:7,19,20,23 136:12 140:10 141:6,19 142:16 145:1 145:17 148:23 149:16 154:11 154:13,15 155:5 157:1 160:4 162:22 164:7 165:2,11 166:5,11,12,14 168:18 174:22 175:12,21 176:24 180:1 182:12 183:20 187:17,23 188:9,25 190:11 192:24 193:3 194:20 196:10,20 201:6 202:11 202:16 206:9 206:10 207:4 209:8 210:6 222:13 228:13 229:4,7,9 sort 38:2 39:19	57:16 58:23 71:23 72:12 76:24 80:15 111:8 163:9 181:13 186:24 211:15 Soto 1:3 2:6 7:16 18:1 240:20 sounds 31:23 south 2:4,22 28:24 51:1 137:9 spaced 108:24 sparked 216:5 speak 10:20 38:7 96:13 97:10 98:5 184:2 231:25 Speaker 95:10 95:11 Speaker's 96:5 188:10 speaking 9:13 speaks 220:25 221:21 special 8:15 20:21,24 Specialist 27:3 27:10,12 specific 16:21 18:13 24:11 27:25 31:4 33:20 43:11 47:1 50:23 58:20 72:23 73:8,9 75:5 76:2 84:4 91:15 126:6,13 127:20 129:9 138:19,21 139:2 141:18 141:18 148:17 149:18 151:10 151:12,15 154:23 159:9
--	---	---	--	--

Osta Davis

August 19, 2022

Page 273

172:25 173:23 183:10 186:17 196:7 224:5 specifically 11:8 35:9,12 39:1 46:24 47:21,23 74:5 106:16 111:6 112:25 126:14 138:7 155:1 197:13 217:5 228:11 specifics 194:23 specify 132:11 speculation 18:23 21:2 30:4 40:15 44:16 45:6 53:24 55:8 60:24,25 64:15 68:6 84:24 85:5 90:25 119:14 120:10 121:13 125:20 126:8 131:1 133:16 145:25 147:16 152:4 161:12 174:4 176:3 179:16 182:17 184:8 184:14 208:18 218:7 220:25 221:7 222:15 227:20 230:17 230:25 231:11 231:24 232:5 232:15 233:11 spell 16:11 43:14 spent 28:10 split 72:3 76:24 77:1,7,9,10,19 77:22 139:3,3 139:5,9 splits 77:4 138:25 141:15	splitting 76:18 78:2 112:1 200:16,22 spoke 35:22 spring 2:22 87:6 SS 239:2 stable 80:20 staff 5:7 29:13 35:3,6 36:14 37:3,14 38:10 38:12 40:19 41:1,21,21,23 42:3,20 44:2 44:14,19,25 45:1 54:8,11 55:11 60:1,13 60:16 62:22 63:5,9 64:10 65:2,13,15 84:19,21 95:5 95:6,7,8,13 96:5 110:8 124:5 127:4 133:24 134:3 135:8,14,24 136:2,8,10,13 137:3,11,18,24 137:24,25 138:7 143:11 143:25 144:23 148:13 156:2 185:11,15 193:2,11,20 206:3 207:12 231:20 232:1 staffer 62:2,3 155:16 staffers 71:5,9 213:13 staffing 41:18 42:6 staffs 135:12,13 231:15,22 stages 36:6 stamp 149:20	standing 125:15 127:5 stapled 149:21 187:22 start 9:1 36:3 50:25 56:8 58:2,5,6 68:22 158:14 225:15 started 21:22,25 23:20,21 31:14 32:8 36:1,1 37:8 52:6,7,15 56:10 starting 31:19 218:10 235:3 starts 180:8 227:8 state 1:6,7,11 3:7 6:2 8:10 10:16,23 11:11 16:2 23:24 24:1 25:4,6 27:20 45:23 58:11 67:16 73:5,8,25 74:19,20 75:11 76:8,12 78:3 78:22 90:8 109:23 111:10 111:23,24 112:8,10 115:13 117:1 122:8 131:22 140:18 147:6 170:4 180:15 182:1,4 188:16 188:24 190:19 192:15 197:13 210:19,20 211:11 214:16 214:25 215:23 219:23 223:5 229:24 232:19 235:17 237:15 239:2,5	stated 87:23 107:15 113:3 214:6 237:10 statement 4:14 123:12 140:21 149:24 150:1,5 150:14,23 152:24 153:6 179:12 193:22 195:3 217:2 230:2 232:10 235:10,21 statements 193:24 STATES 1:1 statewide 76:4 112:13 statistical 59:3 statistics 158:10 160:5 statute 77:4 stay 211:4 214:24 stays 227:7 steady 233:3 stenographica... 239:6 steps 90:15,17 90:20,22 91:6 STEVEN 1:6 stint 24:17 stipend 23:22 stood 185:4 stop 16:7 68:20 203:19 stories 31:4 strategies 100:24 Street 2:10,22 strictly 112:18 strike 39:19 46:24 49:25 84:18 86:4 90:21 91:17 108:19 132:23	136:12 182:12 221:4 strokes 88:6,8,9 strong 118:25 125:16 128:9 128:10,13 131:7 138:1 163:6 182:3 215:19 216:25 218:12,13 strongly 111:14 121:24 235:23 structure 80:24 study 22:16 stuff 200:8 214:7 Stultz 171:22,23 172:11 subcategories 132:2 Subject 92:21 submit 34:24 61:10 submitted 61:9 61:15,17 85:11 86:14 153:22 173:2 208:3,16 subpoena 190:20 subsection 236:21,23 substance 170:11 sudden 202:9 suffice 10:17 suggest 17:13 78:22,25 Suite 2:4,10 3:4 3:11 summarizing 93:13 Summit 2:3 8:16 support 25:17 38:9 217:5 218:14
---	--	---	---	---

Osta Davis

August 19, 2022

Page 274

supported 25:16 27:5	tables 85:13	132:12 136:6	181:16 216:13	theory 23:5
suppress 112:19	Tacoma 1:20	226:7	217:4 227:3	thereof 239:13
Supreme 6:2,3	7:1 77:13	talks 90:2	232:1	thing 26:18 83:6
207:5 208:3,16	take 9:25 10:1	227:24	testified 7:6	93:16 160:10
234:11,20	12:14 19:3	team 43:9 54:15	114:22 175:8	199:5 225:12
235:21	21:17 33:9,12	63:7 71:11,14	175:16	things 5:18 13:5
sure 15:16 20:21	42:23 47:14,24	71:17 108:12	testify 12:20	13:9 21:11
21:3 30:7	52:19 53:12	108:16 124:11	239:14	23:5 37:7
52:21 62:6	57:23 60:15	124:13 135:6	testifying 12:10	50:13 63:17
93:19 95:17	70:13,24 71:14	136:14 138:1	142:24	111:11 137:22
106:3 113:2	71:19 76:19	148:20 216:12	testimony 12:5	198:21,22,24
115:5 116:5	81:11 89:18	216:13	37:11,16 79:11	224:24 229:21
137:13 139:23	90:15,17 91:6	teams 39:11	108:10 116:3	think 17:18
141:11 153:2	104:25 113:21	technical 66:8	117:15 123:5	28:17 46:7
153:14 156:14	114:7 118:7	technically	127:18 143:1	83:13 92:22
157:2,25	120:1 132:20	65:16	151:2,7 160:24	96:16 109:19
162:12 170:25	141:19 142:14	techniques	161:18 162:9	114:7 122:19
178:1,9 186:8	142:16 146:10	221:23	239:16	125:24 128:6
187:23 210:23	155:10 157:12	tell 7:5 9:20 13:1	text 20:8,11,20	140:15 174:16
223:16	159:22 165:13	13:16 21:22	21:11,18 34:8	188:12,18
surname 102:11	166:10 183:9	23:8 24:24	186:6,8	190:4,14,24
103:10,14	183:12 188:13	26:20 28:6	thank 10:22,24	191:9 212:5
surnames	189:2 198:3	50:1 80:10	53:2 58:17	213:20 219:6,7
103:10	200:9 224:18	91:10,18,25	105:3,11,17	221:10 223:11
surprised	234:4	120:25 125:8	124:18 130:15	225:12 228:12
134:19	takeaway 223:3	131:14 165:8	141:17 146:14	232:3
surprising	takeaways	171:1 172:3	154:10 157:9	thinking 66:18
162:13	109:15 110:5,9	179:3 197:11	158:7 164:12	66:23 192:10
Survey 67:9	228:17	216:7 222:8	166:1,9,12	215:1,11,13
159:13	taken 21:20	telling 85:18	167:15 169:15	third 193:14
SUSAN 1:3	155:4,12	ten 46:12,14,18	169:19,21	218:10 235:2
swap 211:5	160:16 168:25	53:16 94:20	189:12 190:10	thirsty 71:22
swing 227:9,12	201:1 203:15	96:16 99:13	192:17 199:15	thoroughly 26:7
227:18	239:6,17	182:2 228:4,23	202:15 203:14	thought 76:24
switch 222:13	talk 8:1 34:25	tend 71:25	210:11,16	123:1 129:17
switched 154:18	57:24 58:20	232:18,22	211:10 217:12	180:4 181:11
sworn 239:14	97:1,4,7 98:16	term 28:22 30:1	217:13 223:22	181:12 193:3
sworn/affirmed	98:17 100:11	42:11 129:6	223:23 228:25	219:12
7:5	100:14 101:6	terms 28:21	234:8 238:12	thoughts 178:23
system 80:15	216:21 235:4	45:14 57:22	238:16,19	thread 188:4
T	talked 10:14	116:22 122:16	thanked 119:7	224:1
T 4:8 7:8 211:8	64:8 80:22,23	130:20 131:20	Thanks 11:1	three 34:13
229:16 239:1,1	97:17,24	136:3 147:11	105:20 149:6	98:25 100:10
	talking 9:3	160:2 163:9	153:4 238:18	180:9,13
	38:15 53:4	167:1 173:23	theirs 107:15	195:12 196:15

Osta Davis

August 19, 2022

Page 275

196:17,19	106:2,4 108:14	177:3 179:19	204:13,20,21	139:20 172:18
204:10,15,19	113:20,23,25	182:21,24	205:7,9,12,17	177:4 221:16
206:10 221:11	114:4,6 115:21	184:10,16	207:3 211:10	topics 99:9
221:13	116:6 117:19	187:13,15,19	211:22 215:2	100:11
Thrifty-Viveros	119:16 120:12	187:21,25	215:11 218:19	Toppenish
2:20 4:3 7:9,13	121:15 123:11	188:14,17,19	219:21 221:1,3	209:10,17
8:20,23,24	123:24 124:15	188:23 189:2	223:16 227:22	210:6,6
10:12,25 11:4	124:19,22	189:11,15	229:1,5,11	tossup 132:3
15:24 16:11,16	125:3,22	190:1,9,11,17	232:9 239:10	total 84:5
16:18,24 17:2	126:11 128:7	190:23 191:2	239:17	106:24 141:23
17:5,10,17,20	128:23 129:14	191:12,20	timeframe 211:3	141:25 142:2,2
17:23,25 18:24	130:14 131:3	192:2,9,13,17	timeline 5:7	142:5,6 144:15
19:8,24 21:4	132:13 133:10	192:20,23,25	183:23 220:9	160:12 200:18
23:2,5,8 26:11	133:18,23	193:5,7,11	timelines 100:23	tough 16:17
28:19 29:10,17	135:3 138:13	196:6 197:19	timely 113:13	trade 181:15,19
30:6,24 32:4	141:9,17 144:3	197:23,25	times 24:9 34:13	182:4
32:21 35:4	144:7 145:22	198:5,8,11	49:18 58:4,6	traded 186:3,18
36:17 37:13,18	146:2,8,11,13	199:12,14,16	61:10 82:6	193:15
40:12,20 41:3	146:15 147:19	200:1,7 201:2	94:15,20 96:15	tradeoffs 235:24
41:16 44:18	149:16,25	201:5,10,13,24	96:16,18,20	training 85:15
45:2,8 47:6	150:11,21	202:11,14,16	109:12 113:2	85:20,22,25
49:15 51:24	152:10,14,18	202:18,25	tinkering 187:7	transcribed
52:14,19,22	152:21,24	203:11 205:16	title 27:9,11,16	239:8,16
53:1,3 54:1	153:3,5,10,15	206:10,24	27:21 33:15	transcript 11:21
55:12 57:8,22	154:6,9,11,15	208:1,20 209:7	95:17 155:17	239:16,18
59:4 61:4 62:1	154:16 155:5,9	210:8,14 211:5	155:23 158:9	transmittal
64:7,17 65:19	156:19,23	217:13 223:23	165:15 170:25	207:5,10
67:7 68:8	157:1,4,7,10	throw 236:12	198:6,8 225:8	treasurer 74:19
69:20 70:12	157:12,18,23	ties 100:15	titled 153:21	75:11 180:15
72:16 75:8	158:2,4,8,12	time 10:15 24:10	157:20 158:15	208:8 229:24
77:8 79:14	158:14 159:4,8	28:10 33:12,23	174:23 201:25	Treasurer's
81:10,20 82:1	159:19,20	34:2,3,23	today 5:3 10:7	73:6,8 74:1,20
83:6 84:10	160:17,20	49:18 57:8	12:6,9,18,23	76:9,13 78:3
85:1,9,21	161:1,6,15,20	69:16,21,22,24	26:12 190:16	78:22 131:22
86:11 87:19	162:15,21	95:7 98:20	191:10 211:14	197:14
89:2,12,14	163:8,17,25	103:1 109:14	told 112:22	trends 111:24
91:3 92:9,15	164:7,12	127:19 139:22	117:25 118:8	TREVINO 1:10
92:18 93:2	165:11,20,24	145:4 152:8	154:21 206:4	trial 12:3
94:10 98:1	166:2,4,7,10	158:1 167:17	tomorrow 153:1	tribal 95:16
101:10 102:23	166:13 169:5,8	180:21 189:24	tool 41:8,9 66:11	108:22,23
103:20,22	169:12,14,21	190:3,5,6	66:14 102:11	109:13 110:2,5
104:2,6,14,18	169:24 170:2	192:14,15	160:2,4	111:18 143:7
104:21,23	174:6,25 175:1	194:12 195:10	tools 59:16 85:8	151:3,8
105:6,10,12,16	175:5,12,18,21	195:16,23	228:22	tried 106:16
105:18,21,24	176:6,14,18,23	201:18,20	top 104:7 124:25	true 89:12

Osta Davis

August 19, 2022

Page 276

239:16 240:3 Trump 73:21 truncated 202:12 truth 7:5,6,6 239:14,15,15 try 9:20 13:2 72:20 111:25 165:24 211:12 214:24 trying 38:2 104:14 110:13 149:17 215:10 224:8 237:3 Tuesday 22:3 203:23 turn 11:3 217:9 221:9 223:19 225:14 229:5 234:25 turned 36:16 turnout 143:16 143:18 210:5 tutorial 63:24 64:3,8 65:1,6,7 65:8 66:5,10 66:13,15 tutorials 63:20 63:22 64:4,24 66:1 tweaks 195:12 twenty 99:22 Twenty-eight 196:9 two 24:9 46:11 49:17 64:4,6 80:13,23 84:12 114:8 115:20 116:7 117:3 151:5 161:16 196:22 204:18 204:23 205:1,3 206:10 207:4 219:17 two-page 105:7	type 120:13 typewritten 239:7 typical 36:2,4 typos 12:2 <hr/> U UCLA 2:13,15 8:3 ultimate 223:1 Um-hmm 49:22 63:1 77:12,14 79:14 88:1 112:3 116:12 120:12 127:1 130:11 181:24 unassigned 167:2 uncertain 116:22 200:18 uncomfortable 127:4 undercount 168:13 undercounts 167:23 undersigned 239:4 240:2 understand 9:19 11:18 12:12,25 13:1 38:4 45:8 88:20 129:15 167:19 179:14 182:7,11,12 195:18 204:4 209:4 215:10 221:10,12,18 222:25 229:5 237:19,24 understanding 18:25 28:22,23 28:25 29:2,9 29:18 30:1,22 32:12,22 33:6 35:2,15 38:7,9	39:1 40:6,16 40:25 43:3,10 43:22 44:23 45:10 46:9,13 47:4,8,17 50:3 50:10 54:22 59:15 60:8 61:1 63:3 64:23 66:7 67:22 68:7 69:5 74:11 75:11 79:2 85:6 87:4 88:10,23 89:3 89:5,7,17 90:1 91:4 100:8 109:20 112:17 117:16 123:6,9 124:10 127:11 127:15 130:18 130:20,23 131:17 133:8 136:18 138:5 141:22 145:19 146:1 147:17 148:2 152:6 156:7 160:1,12 168:24 171:3 172:7 176:4 177:19,25 178:3,19 180:14 182:13 184:20 185:2 186:5 189:18 191:3,24 194:11 195:1 196:13,19 197:12,17 199:21 204:2 204:12 207:21 207:24 212:20 212:23 215:18 217:3,22 219:3 220:8 223:4 224:10 227:16	227:21,25 228:5,21 230:18 231:19 232:6,22,25 233:2,5 236:3 236:8 237:14 237:20 understood 9:21 17:12 42:20 45:2 112:8 140:13,15 144:20 181:19 192:5 undo 151:20 unexpected 56:3 unintentionally 19:25 unit 222:17,20 UNITED 1:1 unites 151:1 universities 99:15 University 100:16 unquote 168:9 upcoming 63:19 update 98:3 updated 4:16,23 106:8 150:16 153:5 157:14 upload 39:11,23 40:10 60:9,14 61:1 111:3 169:6 176:18 uploaded 59:24 73:4 160:1 207:24 uploading 207:14 upper 145:15 upshot 220:7 USDC 240:21 use 19:5,9,16,21 20:14,18,18,25 28:21 29:4	38:12 39:21,23 41:5,10 67:3 68:9,16,17 69:8,15 74:10 74:13,14,18 75:4 78:4 79:23 80:2 159:15,25 160:8 183:1 226:8 230:19 useful 223:10 user-friendly 41:8 uses 29:18 usually 9:6 82:8 utilize 74:1 83:15 84:4,7 utilized 75:12 102:11 228:23 <hr/> V v 1:5 7:16 15:19 18:1 31:21,24 32:5 240:20 V4 4:11 V5 4:17 153:21 vague 15:23 16:1 19:7 23:4 26:9 28:16 29:15 40:24 41:15 44:21 49:13 51:23 52:12 65:14 69:18 70:10 72:14 77:23 81:8 101:8 115:18 123:21 128:5,18 129:12 133:5 133:21 135:1 145:18 146:5 159:18 162:17 163:11,20 164:3 179:15 200:3 201:22
---	--	---	---	---

Osta Davis

August 19, 2022

Page 277

205:13 206:8 207:23 231:4 vaguely 13:10 97:16 129:16 161:8 177:12 181:1 Valley 29:22,24 30:2,9,17 31:2 31:15 47:16 51:4,6 52:15 102:15 109:25 112:25 118:5 125:10 126:15 128:22,25 137:12 139:24 140:4 143:3,6 145:20 147:20 148:1 150:23 151:3 172:20 172:23 173:3 173:22 181:13 185:3 195:14 195:17 199:8 199:19 200:2 211:20 212:7 212:24 213:5 215:3,6,15 217:6 223:8 232:24 Values 4:15 150:14 Vanderwerf 38:22 VAP 106:24 variance 71:25 72:5,9,13,18 72:21 varied 34:9 58:9 82:6 various 73:2,7 221:22 vary 147:12 vehemently 137:3 verbal 9:15	verbally 213:16 verified 207:25 verify 61:1,5 160:13 version 106:9,10 106:12 115:6 126:22 127:16 157:14 158:18 173:3 176:5 198:17 versions 162:14 162:20 163:21 versus 33:24 69:14,15 161:21 178:25 226:19 video 11:3 view 145:3 156:20 183:16 viewed 145:19 viewing 136:3 views 213:4,12 violation 129:18 Virginia 3:17 virtually 42:8 vision 136:19 vocal 139:5 Vogel 3:16 8:18 voice 111:16 voices 111:19 vote 32:24 73:19 73:20,21 112:13 146:19 146:24 163:19 204:13 222:5 232:18,22 voted 204:6 voter 26:24 143:15 146:17 146:21 147:3,5 147:8,12,17,20 147:25 148:6,8 148:14,24 149:3 172:7 217:4	voters 32:25 143:19 147:14 148:3 212:6 218:14,15 voters' 112:13 votes 33:7 112:20 voting 2:13,15 8:3 31:16,16 32:17,18,23 33:2 84:6 87:8 87:9,24 88:4 88:11 89:3,5 89:18,20 90:1 90:10,18,23 91:8,11,20,23 92:20,23 93:4 93:10 94:3,9 97:11 106:14 107:18,21,23 120:17 121:5 121:18,22 122:4,7 123:3 123:7,8 125:9 126:22 128:9 128:12 129:18 142:3,7 143:21 143:25 144:16 144:17 145:4,7 147:13 150:15 150:18,22 159:12 160:7 163:14 170:13 182:15,20 203:25 208:11 208:15 211:23 212:11,16,18 212:23 213:5 214:13 215:20 218:23 219:2,4 221:24 223:5 223:14 226:9 226:20 227:1 228:17 237:15 VRA 106:8,10	106:14,23,25 107:10 127:13 128:16 129:7 129:15 130:1,6 130:23 131:5 133:1 145:19 215:2,13 <hr/> W W-A 19:15 w/new 4:19 WA 4:19 19:14 wage 25:2 wait 106:21 waiting 203:13 waived 190:18 190:21 192:4 239:9 Waknin 2:14 8:2 walk 34:22,23 36:2 39:24 42:2 110:16 205:21 230:11 235:19 Walkinshaw 4:23 43:9 51:13 52:3,16 54:2,4,14 79:21 80:1,7 80:19 97:5 110:22 115:8 118:4 119:5 128:20 129:2 132:15 134:10 134:14,19 135:10 136:9 137:2,11,19,23 144:8 170:14 193:17 194:18 195:6 196:23 205:25 206:4,7 206:13,15,19 206:25 230:10 230:13,18	232:1 Walkinshaw's 54:11 71:11,14 71:17 108:12 108:16 111:5 117:17,20 118:9,23 124:5 128:24 135:6,7 135:14,24 136:2,21,25 138:1 230:14 231:20 want 13:6 14:15 30:6 39:22 57:24 58:21 92:9 94:5 111:11 112:19 123:15,17 145:10 153:2 163:2 166:18 181:22 183:1,9 189:5 192:6 200:7,8 203:11 211:6,13 224:20 225:12 228:13,14 229:20 238:5 wanted 26:18 50:14 109:16 111:22,25 117:11 118:6 132:25 136:19 136:20 138:5 139:3,14 142:10 166:7 180:3 183:10 191:10 199:14 223:17 224:12 wanting 163:21 219:3 Wapato 209:13 209:21 210:5 Washington 1:1 1:7,7,20 2:4,10 3:4,7,10,11 6:2
---	--	--	---	--

Osta Davis

August 19, 2022

Page 278

6:2,5 7:1 8:10 22:8 23:22 26:20 49:8 100:15 111:23 112:8,10 122:8 123:10 140:16 140:17 170:24 171:2,7,13,17 171:19 208:3 214:24 217:1 219:23 223:5 232:19 235:17 236:3,18 237:15 239:2,4 239:5,18,23,24 240:21 Washington's 11:11 Washingtonians 237:22 wasn't 20:10 37:17 57:16 65:17 83:1 112:18 126:17 156:3 162:13 223:16 229:7 watch 105:15 watered 126:22 127:14,15 128:15,16 129:6,15 way 13:2 28:12 33:8 57:15 79:18 83:19 92:25 93:19 111:20 113:13 121:8 123:12 132:4 135:23 136:1 142:21 174:11 185:11 ways 116:12 141:10 we'll 9:12,25 13:17 52:24 53:1 58:20	104:23 124:16 160:18 182:22 189:11 191:22 192:18 197:20 210:9 229:14 235:4 238:6,7 238:10 we're 8:25 9:25 10:7,21,25 11:6 12:8 13:4 77:19 155:6 188:13 202:13 210:15 213:23 213:24 238:13 238:14 we've 21:20 159:11 webinar 90:7,11 website 41:2 42:18 46:17 51:14 61:3 Wednesday 26:5 week 34:11,13 48:24,25 82:6 153:23 154:12 weekly 41:22 44:2 62:21 63:13 weeks 55:22 197:6 204:9 weight 120:2 181:8,10 Wenatchee 100:15 went 22:11 53:3 56:9,12 102:7 114:8 weren't 139:23 146:3 232:3 West 3:4 western 1:1 140:15 240:21 WHEREOF 239:19 white 32:24	127:4 147:14 148:3 218:15 Whitman 22:15 wholly 200:20 Win 172:1 Win/ 171:25 Win/Win 172:4 windows 234:2 witness 2:2 8:16 10:16 16:6,15 175:8,16 191:22,23,24 218:1 233:24 239:6,7,9,14 239:19 240:20 witness's 17:19 witnessed 235:16,20,22 woman 63:6 wondering 146:9 226:6 word 61:7 83:9 wording 129:9 words 9:16 29:4 129:7 141:8 222:2 work 14:19 18:19,20 19:2 19:3,9,10,21 20:7,7,12,19 22:4 26:24 27:1 28:3,4 29:3,22 31:19 32:9 33:19,24 34:6 36:6 37:5 37:19,19 38:10 38:23 47:25 54:4 55:6,14 57:11,25 61:2 62:16,24 66:18 80:15 95:18 119:5 139:15 147:2,7 150:7 170:5 171:4 172:10 211:25	212:25 213:18 217:5 219:23 219:24 223:18 224:13 225:25 worked 21:21 23:15,23 24:1 24:2,3,4,6,10 24:19,23,24 25:1,3,5,8,13 25:16 28:11 33:21,25 35:17 37:4,23 38:3 38:19 39:4 43:2 54:7,14 62:23 63:5 94:2 110:22 116:8 123:25 135:23 146:16 146:21 149:2 170:14 214:17 working 19:1,6 19:17 20:6 21:22,25 23:20 24:7 27:19,25 28:2 33:11 34:2,3 36:1 38:1 41:20 55:5 56:8,17 57:9 65:3,17 65:18 115:19 135:15 147:4 150:5 153:19 166:16 193:21 193:23 201:21 204:22 205:14 works 7:12 94:13 workshop 85:22 workweek 33:25 34:6 wouldn't 57:21 58:19 92:25 112:19 117:5 121:23 137:21 157:25 182:4	194:3 wrap 190:2 writes 166:24 183:22 193:1 194:17 195:21 196:22 204:19 205:25 writing 213:16 written 15:3 31:7 83:1 112:18 184:18 204:1 wrong 156:24 wrongs 151:20 151:22 152:1 wrote 106:8,23 157:14 167:21 168:19 198:17 198:20 205:2 Wylie 98:18 <hr/> X X 4:8 7:8 211:8 222:5,18 229:16 <hr/> Y Y 222:4,21 Yakama 107:11 107:14 108:6 108:20,21 109:13,21 114:18 151:1 Yakima 5:20 29:22,24,25 30:1,9,17 31:2 31:15,21 32:5 47:16 51:4,6 52:8,15 102:15 109:25 112:25 118:5 125:10 126:14 128:22 128:25 137:12 139:8,23 140:4 143:3,6 145:20
---	--	---	---	---

Osta Davis

August 19, 2022

Page 279

147:20,25	192:9 196:13	10:48 198:12	14th 2:10 4:21	124:17 145:2
150:22 151:3	198:2 202:16	100 92:25 194:3	4:21 173:12,14	159:5 186:2
172:20,23	209:7 221:15	1000 2:4	177:14,23	218:12 222:1
173:3,22	224:22,25	104 4:10	180:8 226:23	225:23 239:23
174:17,18,19	234:7	10th 157:19	15 5:19 6:3	2:27 146:12
175:6 181:13	year 34:20 68:10	158:19 161:25	49:23 114:16	2:40 146:12
185:3 195:14	68:12 69:3,8	11 5:9 187:18,19	115:2 153:25	20 46:12,16,18
195:17 199:8	69:21 70:1	187:20	154:18 164:9	53:16 189:21
199:19 200:2	115:17 116:21	11/10/21 4:19	178:6 184:23	210:23 229:11
200:10,13,16	155:21	157:20 158:12	185:5,9 202:4	238:9
200:19,22	years 68:14	158:15	203:4 208:22	2000 3:11
211:20 212:6	99:13 115:17	11/12 4:24	209:11,14,17	20005 2:10
212:23 213:5	115:20,22,25	165:16 174:23	217:10,11	2001 155:16
215:3,6,15	116:1,7 117:3	11/12/21 4:22	227:16 229:13	214:3
217:6 218:11	117:13 182:2	11/13/21 5:4	152 4:16	201 5:15
223:8 232:24	228:5,23 233:2	11/14 5:16 202:1	15405 3:17	2011 58:7
YBARRA 1:11	young 26:21	11/14/21 5:2	155 4:18	138:24 141:14
yeah 8:1 9:14		11/15/21 5:9,10	15th 113:15	152:9
12:25 13:3	Z	5:12,15	166:21 177:14	2013 25:1
17:20 20:10	zero 72:9	11/2/21 4:18	177:23 178:15	220:23
23:18,21 26:18	Zoom 2:8,8,9,14	11/21/21 5:6	182:9 184:24	2014 25:3
28:19 32:22	2:15 3:3,8,8,16	11/4/21 4:20	197:20	2016 25:5
33:24 39:19	7:3,22 8:3,12	11:00 197:20	16 5:21 220:15	20169-2706 3:17
46:19,20 56:6	14:3 42:7 46:1	11:22 201:13	220:17	2018 25:8 35:22
58:2 62:12	78:14,16 156:8	203:16	160 4:20	2019 69:5
66:9 73:25	176:19 188:22	1101 2:10	164 4:22	159:12,12
89:4,16 96:21		11th 2:22	169 5:2	166:23 167:23
97:24 102:19	0	12 5:12 175:13	16th 203:24	168:12 178:16
103:3,22 104:3	1	197:22,23,24	204:21 205:24	182:10 202:4
104:14 106:22	1 4:10 104:4,5	12:20 113:20	17 5:22 139:22	226:19 227:1
113:23 115:5	114:10,13	12:22 114:3	223:21 228:15	2020 5:19 25:8
117:19 119:2	154:8 159:5	124 4:12	176 5:4	28:4 68:15
120:15 125:3	1:00 204:20	1250 1:19	18 6:2 233:15,16	69:6 73:5,8,20
133:9 134:23	1:24 114:3	12th 165:1,15	182 5:6	73:25 74:18
140:4 146:11	10 5:6 139:21	166:19 176:10	187 5:9	75:11 78:3,22
152:20 154:15	140:2,3 157:13	13 5:15 201:8,9	19 1:17 6:5 7:1	160:7,12 168:5
155:22 157:4,8	182:22,23	13th 177:4	236:14,16	168:9,15,20
158:2 164:13	192:22,23	14 5:17 115:10	240:22	208:8,9 211:18
165:9 168:16	10/19/21 4:10,11	154:3,18	197 5:12	229:24
169:25 175:10	10/22/21 4:12,17	158:21 178:5	19th 101:20	2021 6:4,4 21:21
175:14 178:11	153:21	199:13 213:24	104:18 153:23	34:21 90:12
183:19 184:16	10/25/21 4:14,16	213:25 219:15	153:24	99:22 153:23
188:14,17,23	10:00 207:3,7	237:3,7		224:2 234:11
188:24 190:1	10:21 52:25	14/15 139:23	2	2022 1:17 7:1
190:23 191:20	10:31 52:25	149 4:14	2 4:11,12 124:16	239:20 240:22

Osta Davis

August 19, 2022

Page 280

2023 239:23	3250 2:16	225:15	833 1:23 240:24
21 6:4 157:13	329 190:7	5.28.010 239:4	
211 4:3	35 139:22	5:20 223:2	9
213 5:17	36 180:11	5:50 1:17 238:20	9 5:4 176:15,16
217 5:19	365-3376 1:23	50 46:12 110:12	176:21 180:6
220 5:21	240:24	132:1 162:5	9:10 1:17 7:2
223 5:22	3rd 234:11	168:7,10,17,21	90 66:24
229 4:4		178:17,24	90014 2:22
22nd 134:24	4	179:1 203:5	90095 2:16
233 6:2	4 4:16 152:12,13	227:2,3	98104 3:11
236 6:5	159:3,5 196:21	50.0 158:21	98104-2682 2:4
25th 149:7 153:7	222:7,8,10	51.3 162:6	99 40:3
153:22 214:3	4:10 189:14	51.6 154:3	99336 3:4
224:2	4:14 189:14	51.7 106:23	
2711 1:22	226:12	153:25	
239:23 240:23	4:18 192:8	53 132:1	
28 139:22	4:50 227:5	54.9 132:1	
186:21 195:2	4:55 210:13	55 98:9,21	
196:10 197:18	4:58 210:13	131:23	
28th 239:20	40 66:22	56 98:11	
29 190:8	400 2:10	58 196:8	
2nd 157:17,19	42 139:21		
157:21 158:16	43 6:6 236:18,23	6	
158:18,19	44 139:21	6 4:20 160:18,19	
160:22 161:2	186:23 195:2	162:2 204:18	
161:16,21,24	196:8 197:18	220:23	
161:25 162:6	47 139:22	6:00 193:19	
226:12 227:5	186:21 195:2	6:30 194:8	
	196:8 197:18	634 2:22	
3	47.8 166:23		
3 4:14 149:8,9	47th 137:6,15,16	7	
152:16 159:5	137:19 138:3	7 4:3,22 164:11	
193:1,4 218:12	180:10	164:12,14	
221:10 234:25	48.2 225:19	174:25 175:9	
3/25/21 5:17,22	49 196:11	175:13 182:6	
3:22-cv-05035...	49.2 166:24	7:30 5:16 193:19	
1:7 240:21	182:10 202:5	194:9 202:1	
3:29 187:16	203:5	7325 3:4	
3:30 173:17	4th 161:22 162:7	76.34 106:24	
30 139:22			
189:21 210:23	5	8	
229:11	5 4:18 155:7,8	8 5:2 169:3,4,5	
308-14-135	160:21 161:10	169:23,24	
239:18	161:19 162:10	205:23	
315 2:4	203:20,23	8:45 196:22	
		800 3:11	