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UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF WASHINGTON

SUSAN SOTO PALMER, ET AL.,

Plaintiff,

v.

Case No. 3:22-cv-05035-RSL

HOBBS, ET AL.,

Defendant.

DEPOSITION OF

ANTON GROSE

TAKEN ON
TUESDAY, AUGUST 16, 2022
9:09 A.M.

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DEPOSITION OF**ANTON GROSE****TAKEN ON****TUESDAY, AUGUST 16, 2022****9:09 A.M.**

THE REPORTER: We are on the record. The time is 9:09 a.m.

Mr. Grose, would you please raise your right hand? Do you solemnly swear or affirm under penalty of perjury that you are Anton Grose and the testimony you're about to give will be the whole truth and nothing but the truth?

MR. GROSE: I do.

THE REPORTER: Thank you. Counsel?

ANTON GROSE, having been first duly sworn, was examined, and testified as follows:

EXAMINATION**BY MS. WAKNIN:**

Q. Good morning, Mr. Grose.

A. Good morning.

Q. My name is Sonni Waknin and I represent the Plaintiffs in this case. And I'll be asking you a few questions today. I know you had just stated your full name, but can you please state your full name for the record?

A. Anton Christopher Nicholas Grose.

1 Q. Can you spell your first and last name?

2 A. Yeah. First name Anton, A-N-T-O-N. Last name
3 Grose, G-R-O-S-E.

4 Q. And have you and I ever met prior to today?

5 A. No.

6 Q. This is a deposition being taken based on your
7 role in the 2021 Washington redistricting. Do you
8 understand that?

9 A. I do.

10 Q. And have you ever been deposed before?

11 A. No.

12 Q. I'm going to lay out some ground rules for this
13 deposition. Does that sound okay to you?

14 A. Okay.

15 Q. So today we're going to have an informal -- and I
16 assume professional -- conversation. And as informal as our
17 discussion is going to be, you understand the importance of
18 telling the truth; correct?

19 A. I do.

20 Q. Okay. Do you understand that you are giving an
21 oath today like you would do in court in front of a judge?

22 A. I do.

23 Q. And if there comes a point today where the lawyers
24 in this case or a judge determines that something you told
25 us isn't true, you understand you can be taken to task for

1 that.

2 A. I do.

3 Q. Is there any reason why you cannot tell the truth
4 today?

5 A. No.

6 Q. Are you taking any medications that impair your
7 memory?

8 A. No.

9 Q. Do you have any conditions that impair your memory
10 or brain function?

11 A. No.

12 Q. If your attorney objects to a question, the
13 objection will be noted for the record and you are expected
14 to still answer the question. Do you understand?

15 A. I understand.

16 Q. Mr. Grose, do you believe that the issues in this
17 case are important?

18 MS. GOLDMAN: Objection. Calls for speculation.
19 Lack of foundation.

20 BY MS. WAKNIN:

21 Q. You may answer.

22 A. I do.

23 Q. Why is that?

24 A. Ensuring that this process is done correctly has
25 always been important to, well, myself -- I'm sure the rest

1 of the commissioners as well. And this is part of that
2 process.

3 **Q. Why is it important to you?**

4 **MS. GOLDMAN:** Objection. Relevance.

5 **THE WITNESS:** Ensuring that our electoral system
6 is done fairly, done publicly, done under both
7 constitutional and state guidance -- and federal guidance as
8 well -- that's foundationally important to me.

9 **BY MS. WAKNIN:**

10 **Q. And you said it was important to the commissioners**
11 **as well; is that correct?**

12 **A.** I can't speak for the commissioners, but I would
13 believe so.

14 **Q. Why do you believe so?**

15 **A.** I got to know Commissioner Graves very well over
16 this period. He has a history of both serving House
17 representatives, serving the people of Washington. And from
18 my perspective -- again, can't speak for him -- I think that
19 was very important to him.

20 **Q. I'm going to move on. If you need to go to the**
21 **restroom or attend to something immediately, you are allowed**
22 **to let us know and we can take a break that's off the**
23 **record. Do you understand?**

24 **A.** I understand.

25 **Q. You are the only person that knows if you**

1 understand the question that I'm asking you. So if you
2 answer a question, I'm going to assume that you understood
3 the question. Does that sound fair?

4 A. Sure. Yep.

5 Q. Do you know that you're allowed to ask for
6 clarification to questions?

7 A. I do.

8 Q. Okay. Please remember that we need verbal answers
9 on the record. So no "nuh-huh" or "yeah-huh" or shaking
10 your head. Clear "yes" or "no's". Do you understand?

11 A. Yes.

12 Q. I may ask you again if the record is not clear,
13 folks are talking over each other, or if you give a non-
14 verbal answer to answer a question again. Do you understand
15 that?

16 A. I understand.

17 Q. And finally, I touched upon this, but it's
18 important to talk slow and to not talk over each other. So
19 I do ask that you allow me to finish the question and then
20 you answer. Does that sound okay?

21 A. Sounds good.

22 Q. For the record, what is your race?

23 MS. GOLDMAN: Objection. Relevance.

24 MR. HUGHES: Objection. Relevance. Jinks.

25 THE WITNESS: Caucasian.

1 **BY MS. WAKNIN:**

2 **Q. Can you say that again?**

3 A. Caucasian.

4 **Q. Okay. Are you Hispanic or a Latino?**

5 A. No.

6 **Q. Do you understand that on a census every person**
7 **identifies both the racial group and then if they are**
8 **Hispanic or Latino origin as two separate items?**

9 A. I do.

10 **Q. How do you know that?**

11 A. I worked with quite a lot of data over the last
12 year. As you would imagine, familiarity with the census
13 data as well.

14 **Q. Let's go into that. What data did you work with?**

15 A. The P.L. 94-171 data. As I'm sure you're well-
16 aware.

17 **Q. Can you explain that to me? What is that?**

18 A. Right. So the census has hundreds of surveys they
19 do every year. Clearly what we are all very interested at
20 the state level in is that P.L. 94-171 data. That is the
21 redistrict data. So it contains the files that allow us to
22 do our work.

23 **Q. And so in that file there's a difference between**
24 **Hispanic and, like, and other racial groups; is that**
25 **correct?**

1 **MS. GOLDMAN:** Objection as to form.

2 **THE WITNESS:** Yeah. To the best of my memory,
3 whole host of demographic data; right? So both race and
4 ethnicity are included there.

5 **BY MS. WAKNIN:**

6 **Q.** And you said that you understood they were two
7 separate items.

8 **MS. GOLDMAN:** Objection. Vague.

9 **THE WITNESS:** Came to understand those differences
10 throughout the redistricting process; yes.

11 **BY MS. WAKNIN:**

12 **Q.** In today's deposition I will be using the term
13 Hispanic and Latino interchangeably. Do you understand
14 that?

15 **A.** Yes.

16 **Q.** Okay. And when I refer to White residents, I am
17 referring to White residents that do not identify as
18 Hispanic or Latino. Do you understand that?

19 **A.** Understood.

20 **Q.** Are you aware that this is often called White,
21 non-Hispanic in the field of demography or map drawing?

22 **A.** That's correct.

23 **Q.** And how do you know that?

24 **A.** There had been a host of discussions both through
25 myself and Commission Graves, myself and the other -- our

1 democratic colleagues about that topic many times over --
2 prior to the data coming in to how we were going to decide,
3 you know, what constitutes a majority-minority district, if
4 White Hispanics were included. Many discussions of that
5 nature.

6 **Q. What do you mean by that? If White-Hispanics are**
7 **going to be included.**

8 A. Again, this is all generalized. We have lots of
9 conversations. There was discussion about 2011 maps in the
10 drawing of our -- I want to say it was the Ninth
11 Congressional District, if that had included White Hispanics
12 or not in their count.

13 So there was a period of time where there was some
14 confusion if White Hispanics were included in those counts
15 or not included in those counts. And that process helped me
16 become more familiar with that specific issue.

17 **Q. Okay. And so you said just now that you had**
18 **conversations before the data came out about that term; is**
19 **that correct?**

20 A. I couldn't say exactly when. To the best of my
21 memory it was before the data came out. It might have been
22 after the data came out. Right in around that time.

23 **Q. And you said that you had many meetings on that**
24 **term or on demographic data.**

25 A. This wasn't meetings. Just conversations

1 generally.

2 **Q. How many conversations?**

3 A. I could not say.

4 **Q. Can you guess?**

5 A. I couldn't guess.

6 **Q. You can't ballpark for me how many conversations**
7 **you had about that?**

8 **MS. GOLDMAN:** Objection. Asked and answered.

9 **THE WITNESS:** I couldn't give an accurate number,
10 so --

11 **BY MS. WAKNIN:**

12 **Q. How come?**

13 A. Because we have many conversations about lots of
14 things.

15 **Q. Fair enough. And so do you understand that**
16 **Hispanic or Latino counts all people whom are Hispanic or**
17 **Latino regardless of what race that they had marked on the**
18 **census?**

19 A. That is ultimately where we landed with our
20 counts.

21 **Q. Who's "we"?**

22 A. The Redistricting Commission.

23 **Q. And how did you land on that count?**

24 A. That was -- well, I'm staff. I don't make those
25 decisions. That was between the commissioners. And they

1 landed on that.

2 **Q. So they told you that that's how they landed.**

3 A. That is correct.

4 **Q. And all the commissioners landed on that?**

5 A. I'm not always included in those conversations.

6 But this is what I was told --

7 **Q. And what --**

8 A. -- to the best of my recollection.

9 **Q. When were you told that?**

10 A. I couldn't say exactly when.

11 **Q. Before or after the data came out?**

12 A. Again, I could not say precisely when.

13 **Q. Have you ever been party to a lawsuit in your**
14 **personal or official capacity?**

15 A. Can you clarify?

16 **Q. Have you ever been a party to a lawsuit?**

17 A. Sorry. I just don't know how to answer exactly.

18 **Q. Was your name on one side of the V; right? So**
19 **when we're talking about a --**

20 A. Oh.

21 **Q. -- lawsuit --**

22 A. No.

23 **Q. Okay.**

24 A. No.

25 **Q. There you go. Have you been a witness to a**

1 **lawsuit?**

2 A. Maybe I just don't know the technical terms I
3 suppose. But the -- there was another lawsuit related to
4 the Commission that I was subpoenaed for. So I don't know
5 if that's what you're asking.

6 **Q. What were you subpoenaed for?**

7 A. Well, for a deposition like this. That case
8 obviously settled prior. Yeah.

9 **Q. Did they subpoena documents?**

10 A. Emails and text messages between myself and the
11 Commission.

12 **Q. And did you provide those emails and text**
13 **messages?**

14 A. I did.

15 **Q. And when did you provide those?**

16 A. Again, couldn't give a specific date. Some time
17 after everything had wrapped up.

18 **Q. And again, you didn't testify in that lawsuit; is**
19 **that correct?**

20 A. No.

21 **Q. Okay.**

22 **MS. GOLDMAN:** I think you got the wrong answer.
23 You got a double negative. You said "is that correct" and
24 he said "no".

25 **BY MS. WAKNIN:**

1 Q. Okay. So you did testify in that lawsuit?

2 A. No.

3 Q. How did you prepare for this deposition?

4 A. I spoke with Jessica Goldman on two occasions --
5 once last night, once last week. And I reviewed the
6 complaint several weeks ago.

7 Q. Who else did you talk to?

8 A. About this deposition?

9 Q. Yes.

10 A. I told my girlfriend I was coming in today.
11 That's about it.

12 Q. You didn't speak with anyone else about this
13 deposition?

14 A. Well, I had to put in a TA request for work. They
15 knew I was coming to a deposition. No. No one else.

16 Q. Okay. Do you have any documents with you?

17 A. I do not.

18 Q. Did you bring anything with you?

19 MS. GOLDMAN: Objection. Vague.

20 BY MS. WAKNIN:

21 Q. Did you bring any materials with you today to this
22 deposition?

23 A. No.

24 Q. Did you bring your cell phone with you to this
25 deposition?

1 A. It's currently in my pocket.

2 Q. Do you have any way of communicating with anyone
3 during this deposition?

4 A. Other than talking to you all in this room, no.

5 Q. Okay. Did you speak with any of the commissions
6 from the 2021 Washington Redistricting Commission about this
7 deposition?

8 A. No.

9 Q. Any staff from the 2021 Washington Redistricting
10 Commission?

11 A. No.

12 Q. Any legislatures from the -- from Washington about
13 this deposition?

14 A. No.

15 Q. Did you speak with any legislative staff about
16 this deposition?

17 A. Other than submitting my TA request, no.

18 Q. Who do you submit your TA request to?

19 A. That goes through House staff. It has to be
20 approved by my supervisor.

21 Q. Who's your supervisor?

22 A. That would be Stacey Folsom.

23 Q. Can you spell that?

24 A. S-T-A-C-E-Y, F-O-L-S-O-M.

25 Q. Did you speak with any members or representatives

1 of any political party about this deposition?

2 MR. HUGHES: Objection. Vague.

3 BY MS. WAKNIN:

4 Q. You may answer.

5 A. No.

6 Q. And you said you met with your attorney, Jessica
7 Goldman, twice.

8 A. That is correct.

9 Q. How long did you speak with her?

10 A. First time, to the best of my knowledge, it was
11 roughly an hour. Second time it was roughly 45 minutes to
12 the best of my recollection.

13 Q. And can you just tell me again when you spoke with
14 her?

15 A. Once last night and once last week. I can't
16 remember the day.

17 Q. Where was this meeting held?

18 A. Virtually. First, well, let me clarify. First
19 meeting virtually. Second meeting over the phone.

20 Q. By virtual, like a Zoom?

21 A. Video call.

22 Q. Okay. What platform?

23 A. It could have been Teams or Zoom. We use them
24 fairly interchangeably.

25 Q. Why did you speak with her?

1 **MS. GOLDMAN:** I'm going to object basis of the
2 attorney-client privilege and instruct you not to answer.

3 **BY MS. WAKNIN:**

4 **Q.** So all the people you spoke to you about this
5 deposition was your lawyer, Stacey Folsom, who you submit
6 your time-off request to, and your girlfriend; is that
7 correct?

8 **A.** Informing her that I was coming today on that
9 basis. That's it.

10 **Q.** No one else?

11 **A.** No one else.

12 **Q.** Did you prepare this morning for this deposition?

13 **A.** No.

14 **Q.** Was anyone else in attendance when you spoke with
15 your lawyer about this deposition?

16 **A.** House counsel -- Ohad Lowy -- in the first
17 meeting.

18 **Q.** Can you repeat that?

19 **A.** House counsel, Ohad Lowy, was in our first
20 meeting.

21 **Q.** Can you spell that person's name?

22 **A.** O-H-A-D. And I cannot spell his last name. It's
23 pretty simple if I remember correctly, but, you know.

24 **Q.** Does he represent you in this case?

25 **A.** I don't know how the nature of that relationship

1 works so --

2 **MS. GOLDMAN:** I'm going to object.

3 **THE WITNESS:** -- I'm hesitant to --

4 **MS. GOLDMAN:** I'm going to object that it calls
5 for a legal conclusion. I'm sorry.

6 **THE WITNESS:** Yeah.

7 **MS. WAKNIN:** His representation is a legal
8 conclusion?

9 **MS. GOLDMAN:** The question you asked calls for a
10 legal conclusion. That's my objection.

11 **BY MS. WAKNIN:**

12 **Q. Who represents you in this case?**

13 **A.** Jessica Goldman.

14 **Q. Do you have a fee agreement with Ohad Lowy?**

15 **A.** No.

16 **Q. Okay. Do you have any representation agreement**
17 **with Ohad Lowy?**

18 **A.** No.

19 **Q. And he was there during your meeting with Jessica**
20 **Goldman?**

21 **A.** The first one, yes.

22 **Q. Did anyone provide you with any documents you**
23 **might be asked about these meetings?**

24 **MS. GOLDMAN:** Objection as to form.

25 **THE WITNESS:** No.

1 BY MS. WAKNIN:

2 Q. You said you reviewed the complaint in this case;
3 is that correct?

4 A. I did.

5 Q. When did you review the complaint?

6 A. Several weeks ago.

7 Q. Before or after the meeting with Jessica Goldman?

8 A. Long before.

9 Q. Okay. Why did you read the complaint?

10 MS. GOLDMAN: Objection. I'm instructing you not
11 to answer on the basis of the attorney-client privilege.

12 BY MS. WAKNIN:

13 Q. Did you read the complaint before your
14 representation with Jessica Goldman started?

15 MS. GOLDMAN: I'm going to object to the degree it
16 calls for a legal conclusion. Answer if you can.

17 THE WITNESS: I did.

18 BY MS. WAKNIN:

19 Q. Okay. How did you get your -- how did you get the
20 complaint?

21 A. I looked it up.

22 Q. Why did you look it up?

23 A. Actually could I correct? It may have been sent
24 out via email widely. The House Caucus takes interest -- I
25 can't remember if it was sent out caucus-wide email -- I

1 can't say for certain. But I do know that I did look up,
2 obviously, the case as it was of interest to me.

3 **Q. What email did it get sent to you?**

4 A. It would have -- if it did come via email --
5 again, cannot remember specifically -- my legislative email.

6 **Q. Can you tell me what your legislative email is?**

7 A. Yeah. That is A-N-T-O-N dot G-R-O-S-E at leg, L-
8 E-G, dot law dot gov.

9 **Q. Do you use any other emails for your work?**

10 A. I do not. No.

11 **Q. So you only use your legislative email for work.**

12 A. That is correct.

13 **Q. Do you receive emails about redistricting or have**
14 **you received emails about -- strike that. Have you received**
15 **emails about redistricting on any other email besides the**
16 **email that you've just provided me?**

17 A. For work?

18 **Q. Have you received any emails about redistricting**
19 **other than the email that you have just provided me?**

20 A. Not in relation to my role in redistricting.

21 **Q. Why did you receive -- then in what way did you**
22 **receive those emails?**

23 A. I subscribe to many political -- different
24 organizations getting emails about that. Redistricting
25 matter is discussed obviously in my free time as well. Not

1 so much in state relation, but I take interest in the
2 general process of redistricting in all 50 states, so --

3 **Q. So is it that your anton.grose -- it's Grose;**
4 **right?**

5 **A. Grose. Yep.**

6 **Q. Okay. Anton.grose@leg.law.gov is the only email**
7 **that you've received information about Washington**
8 **redistricting --**

9 **A. That is correct.**

10 **MS. GOLDMAN:** Objection. Asked and answered and
11 asked and answered.

12 **BY MS. WAKNIN:**

13 **Q. You may answer the question.**

14 **MS. GOLDMAN:** Again.

15 **THE WITNESS:** In relation to my work, yes. That's
16 the only email I use.

17 **BY MS. WAKNIN:**

18 **Q. And so the complaint was emailed out to you by**
19 **who?**

20 **MS. GOLDMAN:** Objection. Asked and answered.

21 **THE WITNESS:** Again, I can't recall specifically
22 if it was emailed or not. So I could not say. I know I had
23 seen it in some capacity. Again, I did look at the case but
24 I can't remember if that's how I found it, if it came via
25 email. As you can imagine, we get lots of emails and lots

1 of information.

2 **Q. You looked up this case?**

3 A. Yes.

4 **Q. Okay. How'd you do that?**

5 A. Google.

6 **Q. Why did you do that?**

7 A. Out of interest in the process.

8 **Q. Did you read any other documents besides the**
9 **complaint?**

10 **MS. GOLDMAN:** Objection as to form. Vague.

11 **THE WITNESS:** Can you clarify?

12 **BY MS. WAKNIN:**

13 **Q. Did you read any documents in this case aside from**
14 **the complaint?**

15 A. No.

16 **Q. What did you think of the complaint?**

17 **MS. GOLDMAN:** Objection as to form. Vague and
18 relevance.

19 **THE WITNESS:** I'm not a lawyer, so I can't make a
20 determination on those claims.

21 **BY MS. WAKNIN:**

22 **Q. Anything else?**

23 **MS. GOLDMAN:** Objection as to form.

24 **THE WITNESS:** I thought there were some factual
25 inaccuracies in my opinion. Although, again, I'm not a

1 lawyer or judge. I cannot make those determinations.

2 **BY MS. WAKNIN:**

3 **Q. What factual inaccuracies did you think were in**
4 **the complaint?**

5 A. I would have to go back and review. It's a long
6 complaint.

7 **Q. Did you read the whole thing?**

8 A. I believe I read it through completely. Yep.

9 **Q. How many times?**

10 A. Just one time.

11 **Q. And not recently; is that correct?**

12 A. No. This was several weeks ago.

13 **Q. Okay. Have you been asked to save any documents**
14 **that in your personal belonging related to this case?**

15 A. In terms of typical public records retention,
16 everything's on a typical public records schedule.

17 **Q. Can you explain that to me? What is a typical**
18 **public records retention?**

19 A. It's different for different -- well, obviously
20 legislatures are treated differently too. Off the top of my
21 head I couldn't give you the exact schedule. But they are
22 mandated and our systems on the State are kept that way.
23 Yeah.

24 **Q. So I don't know anything about public records in**
25 **Washington, so can you just explain to me how the -- how**

1 that public records retention works?

2 MS. GOLDMAN: And I'm going to object to the
3 degree it calls for a legal conclusion.

4 BY MS. WAKNIN:

5 Q. You can answer.

6 A. Yeah. The House maintains these records as
7 they're supposed to be kept on schedule. I could not get
8 into specifics. Yeah.

9 Q. What are "these records" that you're referring to?

10 A. Well, all legislative emails, text messages,
11 things like that.

12 Q. So it also applies to your personal devices; is
13 that correct?

14 MS. GOLDMAN: I'm going to object to the degree it
15 calls for a legal conclusion.

16 BY MS. WAKNIN:

17 Q. You may answer.

18 A. In circumstances where it was -- yeah. You'd have
19 to look at the law itself.

20 Q. Has anyone asked you to retain your personal text
21 messages on your personal device?

22 MS. GOLDMAN: Objection as to form. Vague.

23 BY MS. WAKNIN:

24 Q. You may answer.

25 A. Has anybody asked me to retain them? I have

1 submitted text messages for public record that were
2 requested.

3 **Q. And so --**

4 A. I believe the commissioners also have as well,
5 including -- or matching, I guess, if that makes sense.

6 **Q. Can you explain what you mean by that actually?**

7 A. Oh, that I have both submitted my text messages
8 for public record and Commission Graves had submitted his
9 for public record as well.

10 **Q. How do you go about that process? Searching your**
11 **text messages.**

12 A. That process is we are told that there is a public
13 records request -- so the public records officer. And we
14 send them -- all the text messages that apply under the
15 scope of the request.

16 **Q. So you're doing the searching for terms that**
17 **someone provides you; is that correct?**

18 **MS. GOLDMAN:** Objection as to form. Vague.

19 **THE WITNESS:** It's different in every circumstance
20 depending on the request.

21 **BY MS. WAKNIN:**

22 **Q. Can you provide me an example?**

23 A. If they ask for -- you could ask for a date range,
24 you could ask for search terms, you could ask for any number
25 of different things and then those are required by law to be

1 provided.

2 Q. Okay. And does anyone from the State, when you
3 get the public records request, search your personal
4 belongings or is it up to you to search your personal
5 belongings?

6 MS. GOLDMAN: Object as to form. He is from the
7 State.

8 BY MS. WAKNIN:

9 Q. Apologies. Is it the person who's telling you --
10 who's giving you this public records request, who's notified
11 you for it, is it you searching or is it someone else
12 searching your personal devices or text messages for these
13 items?

14 A. In terms of anything on State laptop, that's all
15 -- as far as I'm aware -- that is all available. The State
16 can do all that. In terms of items on personal devices,
17 that is something they can either search -- you could either
18 have the State pull those off or you can provide those
19 yourself as far as I'm aware.

20 Q. If the State is pulling them off as you just said,
21 do you have to ask them to do that or they -- how does the
22 State pull it off?

23 A. That's a --

24 MS. GOLDMAN: Form.

25 THE WITNESS: -- technical question. I cannot

1 answer that.

2 **THE REPORTER:** I'm sorry. Was that object to
3 form?

4 **MS. GOLDMAN:** Yep.

5 **THE REPORTER:** Thank you.

6 **BY MS. WAKNIN:**

7 **Q.** So I want to go back. You just said that there's
8 two ways. Either you search it personally or someone else
9 does it. And how does -- how do you get into a situation
10 where someone else is searching? Do you ask them to search
11 it?

12 **MS. GOLDMAN:** Objection. Compound.

13 **BY MS. WAKNIN:**

14 **Q.** You may answer.

15 **A.** Candidly, this is the first time I've gone through
16 this process, so I could not provide all the specific
17 details on how that works.

18 **Q.** What process?

19 **A.** The public records process.

20 **Q.** So when was the first time that you had gotten a
21 public records request?

22 **MS. GOLDMAN:** Objection as to form.

23 **THE WITNESS:** Couldn't say specifically. But it
24 was in relation to this process. My best guess would be
25 just after the November 15th deadline. But again, that's my

1 best guess on that.

2 **BY MS. WAKNIN:**

3 **Q. Okay. Do you remember any of the search terms**
4 **that folks had asked for in public records requests related**
5 **to Washington redistricting?**

6 **MS. GOLDMAN:** Objection as to form and relevance.

7 **THE WITNESS:** Yeah. There were plenty in relation
8 to the 15th district. And I guess a lot of umbrella search
9 terms around that as well. Latino, Hispanic, things like
10 that. But there were more but I could not remember the
11 exact specific ones.

12 **BY MS. WAKNIN:**

13 **Q. Okay. And so let's use the 15th as -- are you**
14 **talking about the 15th legislative district?**

15 **A.** That is correct.

16 **Q. Okay. And so if someone had asked for records**
17 **pertaining -- including text messages -- about the 15th**
18 **legislative district, how would you search in your phone for**
19 **that record?**

20 **MS. GOLDMAN:** Objection as to --

21 **MR. HUGHES:** Objection.

22 **MS. GOLDMAN:** Go ahead.

23 **MR. HUGHES:** Objection. Incomplete hypothetical.

24 **MS. GOLDMAN:** Objection as to form.

25 **BY MS. WAKNIN:**

1 **Q. You may answer.**

2 A. Yeah. Multiple ways. So in order to ensure that,
3 you know, all records are kept properly -- let me rewind
4 here. In order to ensure that I was siloing texts that are
5 for public records those are not, you know, as far as I can
6 remember not on a schedule and those are always kept. And
7 so I'd search through those.

8 I actually hand-went through every message at the
9 time to ensure that every message that would be in relation
10 to that was kept. And then there's also a search function
11 obviously on your phone that you can go through.

12 **Q. How does the search function on your phone work?**

13 A. Much like your email.

14 **MR. STOKESBARY:** Objection as to form.

15 **BY MS. WAKNIN:**

16 **Q. You may answer.**

17 A. On a technical basis I couldn't tell you. But
18 much like your email. There's the bar at the top. You can
19 search for key terms, things like that.

20 **Q. Did you have any meetings regarding this**
21 **litigation?**

22 **MS. GOLDMAN:** Objection as to form. Which
23 litigation do you mean?

24 **BY MS. WAKNIN:**

25 **Q. Did you ever have any meetings regarding the Soto**

1 **Palmer vs. Hobbs case that you're currently being deposed in**
2 **as a witness?**

3 **MS. GOLDMAN:** And I'm going to instruct you to the
4 degree that those meetings included House Counsel or myself
5 that you are instructed not to answer. Any meetings at
6 which other people attended that were not lawyers are
7 subject to her answer.

8 **THE WITNESS:** Not that I can recall.

9 **BY MS. WAKNIN:**

10 **Q. So you've never had any meetings about this case?**

11 **MS. GOLDMAN:** Objection. Asked and answered.

12 **THE WITNESS:** Only with my lawyer.

13 **BY MS. WAKNIN:**

14 **Q. Did you have any meetings with anyone since**
15 **November 15, 2021, about the possibility of a lawsuit over**
16 **the legislative district map?**

17 **A.** Can you repeat that one more time?

18 **Q. Sure. Did you have any meetings with anyone since**
19 **the November 15, 2021 -- since after November 15, 2021,**
20 **about the possibility of a lawsuit over the legislative**
21 **district maps?**

22 **A.** No meeting that was dedicated to that conversation
23 -- to that specific topic. However it did come up multiple
24 times that there was a lawsuit.

25 **Q. Who did it come up with?**

1 A. It came up generally in conversation in -- with
2 legislators. Not so much, like, one-on-one meetings but
3 more, you know, open-ended -- yeah. I couldn't say specific
4 times. It was a general topic of, you know, concern at the
5 time I think.

6 **Q. When did those meetings occur?**

7 A. I could not say.

8 **Q. Why did you talk about the possibility of the**
9 **lawsuit over the legislative district maps?**

10 A. I wasn't discussing it. This was things that were
11 generally coming up in conversation.

12 **Q. So they were -- it was being discussed in front of**
13 **you; is that correct?**

14 A. Correct. There were times where it was discussed
15 in front of me. Not about the case specifically. On very
16 general terms that there was possibilities that lawsuits
17 could arise from this. Although I don't think that was --
18 that surprised anyone.

19 **Q. Why wasn't it a surprise to people?**

20 A. Redistricting is prone to these types of lawsuits.
21 So I think there was always that risk that we knew this
22 could happen.

23 **Q. Can you elaborate? What do you mean by "these**
24 **types of lawsuits"?**

25 A. Redistricting lawsuits. There's lots of pending

1 cases nationally.

2 Q. Do you remember who was talking about -- who was
3 talking in front of you about the possibility of a lawsuit?

4 A. I couldn't say specific individuals. It came up
5 pretty frequently among legislators, staff, things like
6 that.

7 Q. And when you say they came up pretty frequently
8 among legislators, do you mean the House Republican Caucus?

9 A. Those are the legislators and those legislative
10 staff that I work most closely with. That is correct.
11 Yeah.

12 Q. Anyone else?

13 A. Not that I can think of; no.

14 Q. What were your -- what was your role in those
15 meetings with the House Republican Caucus where they were
16 talking about redistricting litigation?

17 A. Caucus. I can recall one specific time it came up
18 there. Otherwise I think it was more just sort of day-to-
19 day conversations.

20 Q. With who?

21 MS. GOLDMAN: Objection. Asked and answered.

22 THE WITNESS: Yeah. Staff and members from time
23 to time. Yeah.

24 BY MS. WAKNIN:

25 Q. Can you list the staff --

1 A. And again, in a very general sense.

2 Q. Got you. Can you list the staff that you talk to
3 the most frequently?

4 MS. GOLDMAN: Objection. Vague. Is that a
5 general question or do you mean as to this topic?

6 MS. WAKNIN: As to this topic.

7 MS. GOLDMAN: Objection. Asked and answered.

8 THE WITNESS: Paul Campos would have been the
9 person.

10 BY MS. WAKNIN:

11 Q. And was that only during redistricting or that's
12 after redistricting where Paul Campos would be the person
13 you talked to most about?

14 A. Pretty much through the whole redistricting
15 process. We were, you know, the only two -- at the time
16 when I came in I was new. And Paul's pretty much the only
17 staffer that I had any really frequent contact with,
18 especially in terms of the redistricting. He would have
19 been the only one. Yeah.

20 Q. Why would he be the only one that you'd have
21 contact with?

22 A. We worked side-by-side on this. Redistricting is
23 a very esoteric process. So none of the other legislative
24 staff -- they're, you know, busy doing other projects. I
25 was the only one in the House Republican Caucus that was

1 assigned to this.

2 Evan Ridley was brought on as a communications
3 person. But he -- we kind of handled two different realms
4 obviously. I was more on the technical side. He was more
5 on communications side.

6 So obviously sometimes those can overlap, but Paul
7 Campos was the only person that -- only legislative staffer
8 -- excuse me -- that I talked to frequently about
9 redistricting.

10 **Q. And what was Paul Campos's role?**

11 A. We shared similar roles. He worked on the Senate
12 side for Commissioner Fain whereas obviously I was on the
13 House side.

14 **Q. And what did Mr. Campos do during the**
15 **redistricting process?**

16 A. Mostly research, technical work on JAS programs.

17 **Q. What does "technical work" mean to you?**

18 A. Well, in a general sense drawing the maps. That's
19 the easy way to say it. Inputting data, setting up the
20 program, some of the -- Edge is a complicated GIS program,
21 very glitchy. So it would take a long time to set up.
22 There were just general issues, general complaints with that
23 program. But yeah. That's what would sum that up.

24 **Q. Have you spoken to anyone about anything related**
25 **to this case -- the Soto Palmer vs. Hobbs case?**

1 **MS. GOLDMAN:** Objection. Asked and answered.

2 Again, I'm going to instruct you not to answer to the degree
3 that the only communications you've testified you've had
4 regarding this case concern attorney-client privileged
5 communication. Any other communications you may answer.

6 **THE WITNESS:** Typically discussions with Jessica.

7 **BY MS. WAKNIN:**

8 **Q. Okay. Have you ever spoken to Drew Stokesbary**
9 **about anything related to this case?**

10 A. I have not.

11 **Q. Okay. Have you ever spoken to Drew Stokesbary**
12 **during the redistricting process?**

13 A. During the redistricting process, yes. We did
14 meet one time as we did with all legislators. At least be
15 attended to.

16 **Q. You said with all legislators?**

17 A. All House Republican members. Excuse me.
18 Clarify.

19 **Q. When was that meeting with Mr. Stokesbary?**

20 A. I could not say for sure.

21 **Q. And you only had one meeting with him; is that**
22 **correct?**

23 A. To the extent of my knowledge, yes.

24 **Q. Was that meeting over the phone?**

25 A. I can't say for sure. I believe it would have

1 been virtual. But it could have been over the phone, yeah.

2 It was not in person. I know that much.

3 **Q. Are you familiar with an individual named Jose**
4 **Trevino?**

5 A. Sounds familiar. I don't know him personally. To
6 the best of my knowledge I don't know him personally.

7 **Q. Do you know him professionally?**

8 A. Not that I can recall. The name rings a bell.
9 Maybe it was an email at some point in time.

10 **Q. Are you familiar with an individual named Ismael**
11 **Campo?**

12 A. No.

13 **Q. Are you familiar with an individual named Alex**
14 **Ybarra?**

15 A. I am.

16 **Q. How do you know Mr. Ybarra?**

17 A. Mr. Ybarra is a member of the House Republican
18 Caucus.

19 **Q. Did you meet with Mr. Ybarra on redistricting**
20 **matters?**

21 A. I can't say for sure. Again, we tried to meet
22 with all members throughout the process. I cannot
23 specifically recall a meeting with him. Maybe.

24 **Q. Besides a meeting had you ever talked to him about**
25 **redistricting?**

1 A. No.

2 Q. And so when you say meeting with someone, do you
3 mean, like, a formal meeting or just any communications with
4 them?

5 MS. GOLDMAN: Objection as to form. Vague.

6 THE WITNESS: Formal meeting.

7 BY MS. WAKNIN:

8 Q. And so when I say "meeting" how do you understand
9 that word?

10 A. Schedule a time and date to communicate.

11 Q. And so any other communications if they're not
12 formal, scheduled times -- how would you describe that then?

13 A. Communication.

14 Q. Okay. Have you ever discussed anything related to
15 this case with Mr. Ybarra?

16 A. Not that I can recall.

17 Q. Do you know that Mr. Ybarra is an intervener in
18 this case?

19 A. I did not know he was part of the interveners.

20 Q. Do you know Evangelina or Bengie Aguilar?

21 A. I do not think so.

22 Q. Do you know anyone by Susan Soto Palmer?

23 A. I recognize the name from the case, but --

24 Q. Do you know anyone named Lizette Parra?

25 A. No.

1 Q. Do you know anyone named Dulce Gutierrez?

2 A. No.

3 Q. Do you know anyone named David Morales?

4 A. No.

5 Q. Do you know anyone named Heliadora Morfin?

6 A. No.

7 Q. Do you know a Caty Padilla?

8 A. No.

9 Q. Do you know a Faviola Lopez?

10 A. No.

11 Q. Do you know an Alberto Macias?

12 A. No.

13 Q. I probably butchered his name. Have you heard of
14 the organization South Central Coalition of People of Color
15 for Redistricting?

16 A. Can you repeat that one more time?

17 Q. Sure. Have you heard of an organization called
18 South Central Coalition of People of Color for
19 Redistricting?

20 A. No.

21 Q. It is 9:54. How are you feeling, Mr. Grose?

22 A. Can I just get a bottle of water?

23 Q. Sure.

24 MS. WAKNIN: Actually let's take a five-minute
25 break. Does that sound okay? Can we be off the record,

1 please?

2 **THE REPORTER:** Absolutely. We are off the record.
3 The time is 9:52 a.m.

4 **(WHEREUPON, a recess was taken.)**

5 **THE REPORTER:** We are going to go back on the
6 record. Please stand by. We are on the record. The time
7 is 9:58 a.m.

8 **BY MS. WAKNIN:**

9 **Q. Mr. Grose, did you talk to anyone besides your**
10 **lawyer or anyone that represents you on the break?**

11 **A. No.**

12 **Q. You didn't text anyone?**

13 **A. No.**

14 **Q. Okay. It's my understanding that you were**
15 **involved in the 2021 redistricting cycle; is that correct?**

16 **A. Can you repeat that one more time?**

17 **Q. Sure. So it's my understanding that you were**
18 **involved -- you played a role in the 2021 redistricting**
19 **cycle. Is that correct?**

20 **A. In the state of Washington, yes.**

21 **Q. In the state of Washington.**

22 **A. Yes.**

23 **Q. When did you first get involved in redistricting**
24 **in Washington?**

25 **A. I was hired early 2021. January or February.**

1 Early 2021.

2 **Q. Had you been a part of redistricting cycles before**
3 **that?**

4 A. No; I had not.

5 **Q. Okay. How come?**

6 **MS. GOLDMAN:** Objection as to form. Relevance.

7 **THE WITNESS:** Well, I am 28 now. I would have
8 been 18 the last time they did it.

9 **BY MS. WAKNIN:**

10 **Q. You're not Doogie Howser.**

11 A. Apparently not. No.

12 **Q. So you got involved in January of 2021; is that**
13 **correct?**

14 A. Early 2021. Yeah.

15 **Q. Who approached you about getting involved?**

16 A. I was, you know, I don't know how all the
17 conversations went down. I was approached about this late
18 in 2020 that the House Caucus needed a staffer for this
19 specific -- well, obviously it's only once every ten years
20 so you don't keep permanent redistricting staff on. But for
21 someone that they thought had a skillset that could help
22 with redistricting. And so it seemed like a good
23 opportunity.

24 **Q. What skillset do you have that pertains to**
25 **redistricting?**

1 A. Oh, I think some light-level political acumen. I
2 think. It's a guess. I couldn't say exactly what
3 everyone's thoughts were about that.

4 **Q. What do you mean by "political acumen"?**

5 A. Oh, knowledge of the state, the districts, things
6 like that.

7 **Q. Any other skills?**

8 **MS. GOLDMAN:** Objection as to form. Vague.

9 **THE WITNESS:** Hard to -- yeah. You'd have to
10 describe kinds of skills.

11 **BY MS. WAKNIN:**

12 **Q. What skills do you have that pertain to**
13 **redistricting?**

14 **MS. GOLDMAN:** Objection as to form. Vague.

15 **THE WITNESS:** Knowledge of the state, districts,
16 members in those districts, unique characteristics.

17 **THE REPORTER:** I'm sorry. Did you say "unique"?

18 **THE WITNESS:** Unique.

19 **THE REPORTER:** Thank you.

20 **BY MS. WAKNIN:**

21 **Q. What do you mean by your knowledge of districts?**

22 A. Oh, knowledge of members in them, how they perform
23 politically, things of that nature.

24 **Q. How do you know how they perform politically?**

25 A. I have worked in the political space in prior

1 years.

2 **Q. Can you explain to me what working in the**
3 **political space in prior years means?**

4 A. Right. So I was the Political Director at the
5 Washington State Republican Party for the 2020 cycle. So
6 from 2019 to 2020. Prior to that I had worked many
7 campaigns. Some in college, some after college. So just
8 lots of years on campaigns.

9 **Q. What did you do as political director in 2020?**

10 A. Jack of all trades really. Both on the data end
11 -- I had a lot to do with data. Data literacy is a big one.
12 Maintenance of our systems -- lots of various systems --
13 coordination between campaign staff, helping hire staff, run
14 field staff, things of that nature.

15 **Q. What does "data literacy" mean?**

16 A. Helping others understand how to use data
17 correctly is how I define that.

18 **Q. And what data were you using when you were a**
19 **political director?**

20 A. Oh, all sorts of --

21 **MR. STOKESBARY:** Objection. Relevance.

22 **BY MS. WAKNIN:**

23 **Q. You may answer.**

24 A. All sorts of public data, polling, things of that
25 nature.

1 Q. So election returns -- would that be considered
2 data?

3 A. Yep. Yeah.

4 Q. And so how did you know how a district would
5 perform politically?

6 A. I think there's many schools of thought on that.
7 Historical returns typically are a pretty strong indicator.

8 Q. Why?

9 A. Can you --

10 Q. Why?

11 A. -- that question.

12 Q. Sure. Why are historic returns a good indicator
13 for political performance?

14 A. Right. Just obviously different in any given
15 district. You can look at it from the lens of many
16 different races, political races. They typically are pretty
17 consistent. Obviously lots of factors in the results for a
18 specific race, but they just tend to be pretty good
19 indicators of future performance in the same boundaries.

20 Q. And any other ways that you assess political
21 performance besides historic returns?

22 A. In my previous role, yes, there were other ways
23 that we could do that. None that were, I thought, as
24 predictive as historical results.

25 Q. And what were those ways?

1 A. Looking at micro-targeting, things like that.

2 Q. Okay. Anything else?

3 A. Not that comes to mind.

4 Q. So the skills you gave me were knowledge of the
5 state, that you were the political director so you
6 understood political performance of districts, that you knew
7 where members lived, and then also the unique
8 characteristics. Is that all?

9 A. At the time I didn't know where they lived, so
10 that would be incorrect.

11 Q. Okay.

12 A. Yeah.

13 Q. So what did you know about members that made this
14 such a skill?

15 A. Oh, which members were elected in which districts.

16 Q. Would anyone know that?

17 MS. GOLDMAN: Objection. Calls for speculation,
18 lack of foundation, relevance, form.

19 THE WITNESS: Can you rephrase the question?

20 BY MS. WAKNIN:

21 Q. That's fine. What do you mean by you know of
22 unique characteristics? You stated that as to what?

23 MS. GOLDMAN: Objection as to form.

24 BY MS. WAKNIN:

25 Q. You can answer.

1 A. Yeah. Unique characteristics about districts. I
2 think obviously a large part of our, well, commissioner's
3 mandate, Redistricting Commission's mandate, is preserving
4 communities of interest and things such as, you know,
5 defined in State statute. I think those are very important
6 to this process.

7 Q. Okay. And what does a "community of interest"
8 mean to you?

9 MS. GOLDMAN: I'm going to object to the degree it
10 calls for a legal conclusion. You may answer.

11 THE WITNESS: It can mean a lot of things. I
12 think one -- gosh. There's so many different examples of
13 this. It could mean a school district, for example; right?
14 Keeping that all in one district.

15 It could mean tribal reservation. It can mean
16 neighborhoods, some specific neighborhoods. Gosh. I think
17 everyone has a different perspective exactly what
18 constitutes a community of interest. But yeah.

19 BY MS. WAKNIN:

20 Q. How would you personally define what constitutes a
21 community of interest?

22 A. A community that is cohesive in one way or
23 another. Again, it could exist in a lot of different forms
24 and fashions.

25 Q. What does "cohesive" mean to you?

1 A. That's hard to define precisely. Could share an
2 identity in all forms or fashions. Not necessarily
3 political, not necessarily racial. Sometimes it's, like I
4 said, a neighborhood; right?

5 You share a general neighborhood area or you
6 share, in some cases, you know, historical boundaries.
7 Indian reservations is a good example. Yeah. It's a very
8 all-encompassing question so it's difficult to put a precise
9 definition on it.

10 **Q. So cohesive can change. What you think -- strike**
11 **that. What you think of cohesive can change depending on**
12 **the situation; is that fair?**

13 A. No. Not depending on the situation I don't
14 believe. I believe everyone has a different perspective of
15 different cohesiveness of communities or areas, geographies.
16 Again, I think that's pretty loosely-defined in the statute
17 if I remember correctly.

18 **Q. What statute are you referring to?**

19 A. The statutes regarding redistricting.

20 **Q. Is that where you would look to when you were**
21 **trying to understand a community of interest or the idea of**
22 **cohesiveness?**

23 A. Sure. Those were guiding principles obviously.

24 **Q. Why is that obvious?**

25 A. We are bound by State Constitution and State

1 statute to perform this process under that set of principles
2 and guidance.

3 Q. Were there any other skills that you had that you
4 think got you this job on the redistrict -- to staff the
5 Redistricting Commission?

6 MS. GOLDMAN: Objection. Calls for speculation.
7 Lack of foundation.

8 THE WITNESS: Yeah. I would have to speculate on
9 that. Couldn't say.

10 BY MS. WAKNIN:

11 Q. You couldn't say what other skills you had?

12 MS. GOLDMAN: That wasn't the question.

13 BY MS. WAKNIN:

14 Q. What other skills did you have that -- besides the
15 ones that you provided me -- what other skill did you have
16 --

17 MS. GOLDMAN: Objection --

18 BY MS. WAKNIN:

19 Q. -- on redistricting?

20 MS. GOLDMAN: Objection. Objection as to form.
21 Vagueness.

22 BY MS. WAKNIN:

23 Q. You can answer.

24 A. I think you have them.

25 Q. Okay.

1 A. Yeah.

2 **Q. What about map drawing?**

3 A. Can you rephrase the question?

4 **Q. Do you have the skill of map drawing?**

5 A. Prior to redistricting?

6 **Q. Yes.**

7 A. No.

8 **Q. So you learned how to draw maps during this**
9 **redistricting cycle; is that correct?**

10 A. That's correct.

11 **Q. Okay. So you had no mapping experience at all**
12 **before joining the redistrict -- staffing the Redistricting**
13 **Commission?**

14 A. That is correct.

15 **Q. Okay. Who taught you how to draw maps?**

16 A. Paul was a huge help. Probably my one reference
17 in terms of learning how to use Edge and how to use GIS
18 programs.

19 **Q. Did you use anything else?**

20 A. I did.

21 **Q. What did you use?**

22 A. Dave's Redistricting.

23 **Q. Okay. Anything else?**

24 A. To the extent of my knowledge that was it.

25 **Q. So just Edge -- is that autoBound Edge?**

1 A. AutoBound Edge; yeah.

2 Q. So just autoBound Edge and Dave's Redistricting;
3 is that correct?

4 A. That's correct.

5 Q. Okay. When did you meet with Mr. Campos to learn
6 how to draw maps?

7 A. It was -- I couldn't give a specific date or time.
8 We met very frequently.

9 Q. Can you ballpark it for me, how many times you met
10 on map drawing?

11 A. I couldn't. I couldn't say.

12 Q. Is it just too many to count?

13 A. Many times. Yeah.

14 Q. Can you walk me through how Mr. Campos taught you
15 how to draw maps?

16 MS. GOLDMAN: Objection. Misstates the testimony.
17 You can go ahead and answer if you can.

18 THE WITNESS: Can you say that one more time?

19 BY MS. WAKNIN:

20 Q. Sure. Was it Mr. Campos that taught you how to
21 draw maps?

22 A. That and self-learning as well.

23 Q. Let's talk about that. What self-learning did you
24 do to draw maps? To learn how to draw maps.

25 A. A lot of online research. A lot of, quite

1 frankly, playing around on Dave's Redistricting. Mostly
2 every state is unique, populations change. As you're aware,
3 census data came in very late.

4 So we obviously had to use estimates that were,
5 you know, we knew were not going to be accurate to the 2020
6 census to get an idea where movements, you know, may or may
7 not be, demographic changes, all sorts of, you know, small
8 factors that play a role in, you know, what's possible on a
9 final map. So really a lot of self-learning in that area as
10 well as with technical guidance from Paul mostly.

11 **Q. Okay.**

12 **A. Yeah.**

13 **Q. What online research did you do?**

14 **A. Oh, all sorts of research pertaining to pretty**
15 **much all parts of redistricting.**

16 **Q. Yeah. Just, I mean, tell me about this research.**

17 **All types.**

18 **A. Oh, trying to understand -- gosh. It's hard to**
19 **say. There's a lot. Probably most notably understanding**
20 **the census data, what's going to be in it, when it's coming,**
21 **methods of doing so.**

22 You know, lots of -- I'm trying to think of a way
23 to encompass all this. General ideas of, you know, what we
24 should be expecting come redistricting, the process itself,
25 right, in Washington State; right?

1 Obviously this was new to me. So just learning
2 about the process. We spent lots of time early on putting
3 together proposals and drafts. I mean, yeah. It's all a
4 lot. Yeah.

5 Q. So I'm going to talk specifically to you about map
6 drawing and, like, your process of learning how to draw
7 maps. So I want to know -- when you say that you had --
8 what was the first step that you took when you learned that
9 you had to start drawing maps for this commission?

10 MS. GOLDMAN: Objection as to form.

11 THE WITNESS: First step I couldn't say precisely.

12 BY MS. WAKNIN:

13 Q. What was the first thing that you learned about
14 map drawing?

15 A. I couldn't say.

16 Q. Did you read any books about map drawing?

17 A. No books. No.

18 Q. Did you read any online articles about map
19 drawing?

20 A. I'm sure I did. I could not recall which ones.

21 Q. Did you read any technical guides about map
22 drawing?

23 A. Yes.

24 Q. What technical guides?

25 A. There were technical documents given to us with

1 the Edge program if I recall correctly. Quite a few of
2 them.

3 **Q. Who provided you with those documents related to**
4 **autoBound Edge?**

5 A. That would have been the provider of the program.
6 I can't recall who it was at this point.

7 **Q. Any other technical guides?**

8 A. Not that come to mind; no.

9 **Q. Did you read any map drawing manuals?**

10 A. Not that I can think of; no.

11 **Q. Did you have someone come and teach you physically**
12 **on how to draw maps?**

13 A. No; I don't think we did.

14 **Q. Did you have any meetings about how to draw maps**
15 **with anyone during the Washington redistricting cycle?**

16 A. About how to draw maps?

17 **Q. Correct.**

18 A. Paul and I met on many occasions for learning how
19 to use the program. It's a funky program. Had lots of
20 problems. So we'd meet on a pretty typical basis.

21 **Q. Which program are you talking about?**

22 A. Edge.

23 **Q. Okay. Did you have any physical manuals that you**
24 **would look at while drawing maps?**

25 A. No.

1 Q. Okay. Did you have any guidelines that you would
2 look at when you were drawing maps?

3 MS. GOLDMAN: Objection as to form.

4 BY MS. WAKNIN:

5 Q. You can answer.

6 A. What do you mean by guidelines?

7 Q. Was there any reference material that you would
8 look at -- and it could be physical or virtual -- when you
9 were drawing maps?

10 A. Well, we used all sorts of reference materials,
11 right, when doing things whether that was guidance from a
12 commissioner, trying to work with Paul on, you know,
13 creating something. You know, can we do X, Y, and Z? Is
14 that even possible? You know, so that kind of reference
15 material. I guess you could consider that reference
16 material.

17 Q. So for reference material you would look at for
18 map drawing it would be -- and you can correct me if I'm
19 wrong. I'm just trying to get -- understand. It'd be the
20 guidance that you got from a commissioner, most likely Paul
21 Graves; am I correct?

22 A. Commissioner Graves.

23 Q. Commissioner Graves. Okay. And then anything
24 that you would get from Mr. Campos, like any instructions
25 from Mr. Campos for reference material.

1 **MS. GOLDMAN:** Objection. Misstates the testimony.

2 **THE WITNESS:** Yeah. Not so much --

3 **MS. WAKNIN:** Okay.

4 **THE WITNESS:** Can you just repeat what you just
5 said? But not so much the, like, orders or commands given.
6 More just in general research terms; right? So we don't
7 know if this is possible or that's possible. Can we move
8 this here? What if we did this with this district? Can you
9 do that?

10 Lots of this is drawing lots of maps with lots of
11 different changes that probably had no basis ever getting
12 past just trying to understand populations and impacts;
13 right? When you're drawing, if you change on district you
14 change all 48 others.

15 **BY MS. WAKNIN:**

16 **Q. So what do you mean by research terms?**

17 **A. Can you elaborate?**

18 **Q. Well, you just said that Mr. Campos would give you**
19 **research terms for -- that you would use for reference.**

20 **What do you mean by that?**

21 **MS. GOLDMAN:** Objection. Misstates the testimony.

22 **THE WITNESS:** So good example. I think one of the
23 major challenges is understanding that -- say the
24 populations on the east side of the Cascade Mountains had
25 grown slower than the ones on the west side.

1 So one of the research things that, you know, we
2 had to look at was the best ways to bridge that gap because
3 one district was going to have to cross one way or another,
4 which was a unique challenge that we had this year. So that
5 was -- things like that were, you know, research items, the
6 best ways we could handle those populations.

7 **BY MS. WAKNIN:**

8 **Q. Were there any other terms that Mr. Campos would**
9 **give you pertaining to map drawing?**

10 **MS. GOLDMAN:** Objection. Misstates the testimony.

11 **THE WITNESS:** Again, a lot of conversations. I
12 couldn't say specifically.

13 **BY MS. WAKNIN:**

14 **Q. So did you have any other reference material that**
15 **you would look at when you were map drawing?**

16 **A.** Other than items from the commissioners on things
17 we would like to look at or explore, no. I would say that's
18 about it.

19 **Q. Okay. So I want to go back. What other online**
20 **research did you do about learning how to draw maps**
21 **specifically?**

22 **A.** Just answered a question about this. That's
23 everything that I can think of.

24 **Q. Did you watch any YouTube videos on how to use**
25 **autoBound Edge?**

1 A. There were videos provided in the guides. I don't
2 know if they were YouTube or not, but --

3 **Q. Did you watch those videos?**

4 A. I did.

5 **Q. Okay. And what did those videos say?**

6 **MS. GOLDMAN:** Objection as to form.

7 **BY MS. WAKNIN:**

8 **Q. You can answer.**

9 A. Could not recall specifically. It's a lot of
10 technical stuff on setting up GIS programs.

11 **Q. How did you learn how to use Dave's Redistricting?**

12 A. Candidly, Dave's is really simple. It's made to
13 be user-friendly. So that's a lot of trial and error.

14 **Q. How did you find out about Dave's Redistricting?**

15 A. I couldn't say specifically. But it was pretty --
16 that's, like, common knowledge that that was an easy, user-
17 friendly -- I couldn't say specifically how I found out
18 about it.

19 **Q. So just one day -- did anyone provide you a link**
20 **to Dave's Redistricting to use?**

21 **MS. GOLDMAN:** Objection. Asked and answered.

22 **THE WITNESS:** Again, I couldn't recall
23 specifically when that came up.

24 **BY MS. WAKNIN:**

25 **Q. What makes Dave's so easy to use?**

1 A. Well, first of all, you don't have to upload the
2 inputs yourself, which is a nightmare. The speed of it,
3 much faster than other programs because it's not as quite as
4 precise. But it's good. It's simply designed to be a user-
5 friendly, anybody can use it type program.

6 **Q. What inputs are you talking about that you don't**
7 **have to upload?**

8 A. Oh. Uploading different datasets; right? So the
9 census would be its own dataset. Demographics. Obviously
10 when the State goes through the -- the Redistricting
11 Commission goes through the process of prisoner
12 reallocation, that's a whole different dataset in the
13 census. So that impacts everything. So that's a pretty
14 technical process. Again, I have a background in that. So
15 it's a steep learning curve on using Edge.

16 **Q. Okay. What other inputs does Dave's have?**

17 A. Dave's has a number of inputs. There's political
18 data. It has obviously demographics. Has been a while
19 since I've used it so I can't recall everything off the top
20 of my head. But it has a number of things.

21 **Q. What type of demographic data does Dave's have?**

22 A. It has, to the extent that I can remember, it has
23 2010 census, 2020 census, 2019 ACS, other previous ACS
24 datasets. Yeah.

25 **Q. What is the ACS?**

1 A. The American Community Survey.

2 **Q. And what type of political data does Dave's have?**

3 A. Dave's has historical political data.

4 **Q. What do you mean by that?**

5 A. So results from a number of previous political
6 races.

7 **Q. Would those be statewide political races or local**
8 **political races?**

9 A. Those would be statewide if I remember correctly.
10 I can't say for sure all of them, but to the extent of my
11 memory.

12 **Q. Did you have a Dave's Redistricting account?**

13 A. I did.

14 **Q. Okay. And what was that account registered to?**
15 **What email?**

16 A. I would have to go back and look.

17 **Q. Was it your legislative email?**

18 A. I would have to go back and look.

19 **Q. Okay.**

20 A. Yeah.

21 **Q. What other emails do you have that it could have**
22 **been registered to?**

23 A. I do have personal email.

24 **Q. What is that personal email?**

25 A. It is A-N-T-O-N-G-R-O-S-E at yahoo.com.

1 Q. So it's your full name at yahoo.com.

2 A. That's correct.

3 Q. Is there any software besides autoBound Edge and
4 Dave's that you looked at for mapping?

5 A. Not that I use; no.

6 Q. So is there a difference between ones that you
7 looked at and ones that you used?

8 A. Well, the Commission website had a mapping tool.
9 Not something that I used, but obviously I looked at because
10 public comments came in on that.

11 Q. Can you explain a little bit more about that
12 mapping tool? What type of mapping tool was it?

13 A. Can you specify which one?

14 Q. Sure. Was it something that would actually draw
15 maps or would it just allow you to view maps?

16 A. Which mapping tool are you speaking about?

17 Q. So you said that there was --

18 A. Oh.

19 Q. -- a public commission mapping tool. Let me go
20 down to clarify for you. Okay. So you said that there's a
21 public commission mapping tool. Where was that tool
22 available?

23 A. On the redistricting website.

24 Q. Okay. And was that tool to view maps or to draw
25 maps?

1 A. It was for the public to draw maps. We could view
2 maps on that. I believe we also could have drawn maps on
3 that. But again, I did not use that as a mapping tool.

4 **Q. And why didn't you use it as a mapping tool?**

5 A. Already had two others at my disposal. Learning a
6 third one would have been kind of a pain.

7 **Q. How fast did you have to learn how to map?**

8 A. We had quite a bit of time prior to the census
9 data coming out. So that was time well-used just to learn,
10 you know, ins and outs of using the programs.

11 **Q. So can you explain to me that time period before**
12 **the census data came out? Went from what time to what time?**

13 **MS. GOLDMAN:** Objection as to form. Vague.

14 **THE WITNESS:** Can you clarify?

15 **BY MS. WAKNIN:**

16 **Q. Sure. When did the census -- and when we were**
17 **talking about census data, what census data are you talking**
18 **about?**

19 A. Well, the 2020 census. The P.L. 94 data. And can
20 you repeat the other part of the question?

21 **Q. Sure. So I just want to know when was the time**
22 **period that you served on the Redistricting Commission from**
23 **when you first started to when the census data came out.**

24 **MS. GOLDMAN:** Objection as to form.

25 **THE WITNESS:** Are you asking what that was like?

1 I'm having trouble understanding what you're asking.

2 **BY MS. WAKNIN:**

3 **Q. Yeah. No problem.**

4 **A. Yeah.**

5 **Q. Yeah. I'm asking just what that time period was**
6 **like for you as a staffer on the Commission.**

7 **MS. GOLDMAN:** Object as to form.

8 **THE WITNESS:** Oh. A lot of learning, getting
9 acquainted, obviously, with a new role. A lot of commission
10 work prior to having a chair. Maybe there was -- or sorry.
11 Excuse me.

12 Prior to the Commission bringing on official
13 Commission staff, it was kind of a -- we were all working
14 together, all four of the four-corner staffers -- so
15 myself, Paul, Osta, and Ali -- on just the work that the
16 Commission staff would typically be doing. So it was a lot
17 of that and, like I said, learning, getting into a new role.

18 **BY MS. WAKNIN:**

19 **Q. So when you say that -- the four-corner staff --**
20 **what do you mean? What is --**

21 **A. Right.** There was pretty much one staffer assigned
22 to -- there may have been more in the background. Like I
23 said, we had a comms person too. But in terms of kind of
24 the technical support staff it would have been myself, Paul
25 Graves, Osta, and Ali.

1 Q. Paul Graves was part of the staff?

2 A. Or excuse me, Paul Campos.

3 Q. Okay.

4 A. It's confusing with the two Pauls.

5 Q. And so you just stated that -- and correct me if
6 I'm wrong -- that you, the four-corner staff as you dubbed
7 it -- was doing the Commission work before you had official
8 staff. Is that correct?

9 A. Yeah. There were kind of small tasks. We had to
10 submit administrative code, you know, proposals. Typically
11 something just kind of corrections for time. I'm trying to
12 remember.

13 Some other things we had to do were more
14 clarifications to submit to the Code Revisor's Office for --
15 redistricting has become much more technical than it used to
16 be. So just some revisions in the WACs and things like
17 that. Smaller. I couldn't detail every small task we did,
18 but --

19 Q. Right. And when you say Osta who are you
20 referring to?

21 A. Osta Davis.

22 Q. Okay. And who was she? What group was she
23 affiliated with?

24 A. The House Democratic Caucus.

25 Q. Okay. And then when you reference Ali --

1 **similarly, who are you referring to?**

2 A. Ali O'Neil. And she would have been Senate
3 Democratic Caucus.

4 **Q. Okay. When did the Commission get their official**
5 **staff?**

6 A. I couldn't say precisely when.

7 **Q. Were you involved in the hiring for those folks?**

8 A. I sat in on one interview to the best of my
9 memory.

10 **Q. For who?**

11 A. I could not remember for the life of me. There
12 was a lot going on.

13 **Q. Around what time period did the Commission get its**
14 **official Commission staff?**

15 A. Without speculating I couldn't say for sure.

16 **Q. Okay. Was it before the release of the census**
17 **data or after?**

18 A. I believe it was before. But again, I can't
19 remember specifically.

20 **Q. Okay. What was your interaction with the official**
21 **Commission staff like?**

22 **MS. GOLDMAN:** Objection as to form.

23 **THE WITNESS:** Can you repeat that one more time?

24 **BY MS. WAKNIN:**

25 **Q. Sure. So I just want to know what your -- how did**

1 **you interact with official Commission staff once they were**
2 **brought on?**

3 A. Oh, they were in a support role. Sometimes they
4 would ask us for documents, sometimes for guidance.
5 Sometimes we had guidance from the GIS staffer that the
6 Commission hired, which was great. Huge help in many cases.

7 **Q. Who was the GIS staffer?**

8 A. That was Justin I want to say.

9 **Q. Justin who?**

10 A. I cannot remember his last name.

11 **Q. When you say "guidance" what do you mean by that?**

12 A. Oh, like technical guidance. Something's wrong
13 with the program, he would typically either know how to fix
14 it or he was in constant communication, I think, with the
15 provider of the software. So they would help him, you know,
16 parse through issues.

17 **Q. Was Justin the one who was drawing maps?**

18 A. No. Not to my knowledge.

19 **Q. Was there any other guidance provided to you by**
20 **the Commission staff? Official Commission staff.**

21 A. Can you explain what you mean by guidance?

22 **Q. Well, I'm just using -- I'm asking you. When you**
23 **said you got "guidance" from the Commission staff, you**
24 **referred to it as GIS guidance. Is there --**

25 A. Oh.

1 Q. -- any other guidance that you received?

2 A. Not in terms of map drawing, no.

3 Q. In terms of anything else then.

4 A. Not that I can recall.

5 Q. You mentioned that the Commission staff would
6 provide you documents. What type of documents would they
7 provide you?

8 MS. GOLDMAN: Objection. Misstates the testimony.

9 THE WITNESS: Things like prior to meetings we'd
10 get, you know, minutes from previous meetings, agendas,
11 things like that.

12 BY MS. WAKNIN:

13 Q. Who wrote the agendas?

14 MS. GOLDMAN: Objection. Calls for speculation.

15 THE WITNESS: I couldn't say.

16 BY MS. WAKNIN:

17 Q. What was your relationship like with Lisa McLean?

18 A. Good I guess.

19 Q. I'm sure she'll be happy to hear that. Well --

20 A. I think so.

21 Q. What was the nature of your relationship with Ms.
22 McLean?

23 A. Professional.

24 Q. Would you talk to Ms. McLean often?

25 A. Not super frequently. She would send out emails

1 from time to time. Not super frequently.

2 **Q. What was your understanding of Ms. McLean's role**
3 **as the Executive Director of the Redistricting Commission?**

4 A. She was there to really manage the redistricting
5 staff, provide support to the chair and the other
6 commissioners if they needed it. That's about the extent of
7 what the Executive Director would be doing.

8 **Q. And who was -- like, can you list all the official**
9 **staff that you remember that worked for the Redistricting**
10 **Commission?**

11 A. Well, Lisa and Justin. And comms director --
12 Jamie. That's about all I can name. I think there was
13 other -- Sean Flynn I want to say. Sean was really just
14 there to help with, like, video conference stuff for
15 broadcasting. Yeah. That's about -- I think that's it.

16 **Q. For Jamie, are you referring to Jamie Nixon?**

17 A. Jamie Nixon. That's correct.

18 **Q. Okay. And what did Jamie Nixon do for the**
19 **Commission?**

20 A. He was, I believe, the Communications Director.

21 **Q. You had mentioned Evan Riley --**

22 A. Ridley.

23 **Q. Ridley. Evan Ridley. And he was also a**
24 **communications staffer; is that correct?**

25 A. That's correct.

1 Q. Okay. And what did Mr. Ridley do?

2 A. He was communications for House Republican Caucus.

3 Yeah.

4 Q. Would he work with Mr. Nixon?

5 A. I couldn't say. Yeah.

6 Q. In the months before the census data came out what
7 were the activities going on in the Redistricting
8 Commission?

9 MS. GOLDMAN: Objection as to form.

10 BY MS. WAKNIN:

11 Q. You may answer.

12 A. Can you clarify?

13 Q. Sure. What were the types of day-to-day
14 activities that the Commission would do before the census
15 data came out?

16 MS. GOLDMAN: Objection. Calls for speculation.

17 THE WITNESS: Yeah. The Commission itself and the
18 staff and the -- well, I can't speak for every commission.
19 I can't speak for any commissioner. I couldn't say what
20 their day-to-day was.

21 Obviously each of the -- reference four corners
22 again -- does, you know, work in somewhat isolation
23 sometimes. Sometimes it's more collaborative work. So I
24 can't speak to what the Commission staff was doing at that
25 time.

1 BY MS. WAKNIN:

2 Q. Okay. What was your day-to-day like on -- before
3 the census date came out while you were staffing the
4 Redistricting Commission?

5 A. Doing the best I could to, you know, familiarize
6 myself with what data we currently have, what we thought we
7 might see coming, understanding how -- just prior to it
8 coming out, right, how the prisoner reallocation might
9 impact the overall numbers and geographies and drafts and
10 things like that that we had, things we might expect to see.
11 There's a lot of draft map drawing. Yeah.

12 Q. Okay. Where would you save those draft maps when
13 you were drawing them?

14 A. Well, some are on Dave's Redistricting. A lot of
15 them got floated over to Edge ultimately. Yeah. I guess on
16 the computer.

17 Q. On your computer?

18 A. That's correct.

19 Q. Is that your personal computer?

20 A. No. A work computer.

21 Q. And did you save those maps -- draft maps -- as
22 shape files?

23 A. We saved them in several different formats at
24 times. I couldn't say for any given map what --
25 specifically how it was saved just because there were --

1 Edge is -- it can import different kinds. Some work better
2 than others. Yeah.

3 **Q. What types of shape files do maps come in?**

4 A. Well, shape files contain all sorts of smaller
5 files. I'm not highly technical. This is -- Paul's good at
6 this stuff. I'm not so good at it. This is where his
7 guidance is really helpful. But I know they come in
8 multiple smaller files that are kind of aggregated together.

9 **Q. So when you had a question on map drawing would**
10 **you just ask -- and when you refer to -- strike that. When**
11 **you refer to Paul, which Paul are you speaking about?**

12 A. Campos.

13 **Q. Okay.**

14 A. Yes. Well, in this context, Paul Campos.

15 **Q. So when you -- is there a way that you would**
16 **distinguish which Paul you were talking about when you were**
17 **talking about redistricting? Because you worked with two.**

18 **MS. GOLDMAN:** Objection as to form. Did you mean
19 today or in general?

20 **MS. WAKNIN:** Let's do today and then maybe we'll
21 talk -- and then I'll ask in general.

22 **MS. GOLDMAN:** Okay. So I object on compound
23 grounds.

24 **MS. WAKNIN:** Okay.

25 **MS. GOLDMAN:** Why don't you start with today?

1 BY MS. WAKNIN:

2 Q. Why don't we start with today?

3 A. Which Paul I've been referring to today?

4 Q. Yes.

5 A. Well, I'll try to specify --

6 Q. Okay.

7 A. -- if that'll be helpful.

8 Q. Yeah; that would be helpful.

9 A. Yes. Sorry.

10 Q. So --

11 A. It's natural for me, as you can imagine.

12 Q. I work with a lot of Michaels, so I understand.

13 So in the map drawing context when we were talking right now
14 when you mentioned a Paul, was that Mr. Paul Campos?

15 MS. GOLDMAN: Objection. Asked and answered.

16 THE WITNESS: Mr. Paul Campos. Correct.

17 BY MS. WAKNIN:

18 Q. Right. And so when you had a question about map
19 drawing was he your resource that you would go to?

20 MS. GOLDMAN: Objection. Asked and answered.

21 THE WITNESS: On technical issues like that yes.

22 BY MS. WAKNIN:

23 Q. What were other issues on map drawing that you ran
24 into?

25 A. Well, not so much issues wouldn't be how I'd

1 categorize it. But obviously I take guidance from the
2 Commissioner on specific, say, geographies, provide him
3 feedback on that. It's a lot that goes into it.

4 So on specific guidance on what to draw, that
5 would typically come from the commission. And if it was
6 guidance on technical issues that I had, it would typically
7 come from Paul Campos.

8 **Q. Okay. So I want to go back to where you saved**
9 **these map -- these draft maps. Did you show these draft**
10 **maps to anyone?**

11 A. Okay. Yeah. I would review them with the
12 commission from time to time. Paul and I would review maps
13 together from time to time. That was it. We were a pretty
14 closed silo.

15 **Q. Which Paul are you talking about at this time?**

16 A. Both Paul Graves and Paul Campos this time.

17 **Q. Okay. So you would review draft maps with Paul**
18 **Graves and Paul Campos. Would that be together?**

19 A. Typically not together to the best of my
20 knowledge. Closer to the end of the process we would review
21 maps together. But typically it was separate.

22 **Q. Okay. So before the census data comes out you**
23 **were drawing draft maps and that you would show these maps**
24 **to both Mr. Campos and Mr. Graves. And did you delete any**
25 **draft maps?**

1 A. Not complete maps, no. I mean, you know, create
2 hundreds of smaller -- to the extent of my knowledge I don't
3 know that I ever deleted any. But I wouldn't have deleted
4 any completed maps.

5 **Q. What was the difference between a completed map**
6 **and a noncomplete map?**

7 A. Oh. We use maps not just for pure drafting but
8 for understanding, you know, changes in -- how do I describe
9 this? Understanding populations of specific cities, things
10 like that.

11 Would be, you know, things you can -- it was
12 almost easier to use the mapping tool for those sorts of
13 things, almost things you could just Google instead of using
14 the mapping tool.

15 But the mapping tool also provides some
16 geographical context to the numbers. So that was helpful at
17 times to use mapping tools for things that really aren't
18 even specific to redistricting if that makes sense.

19 **Q. I mean, can you explain what you mean when you**
20 **would say that you'd use the mapping tool for things that**
21 **are not specific to redistricting?**

22 A. They could be used for multiple things; right? So
23 let's take the city of Tacoma, for example. Dave's was
24 really good about this; right? You could click -- you could
25 choose to fill in a city, you know, using a -- get an idea

1 of the population of that and then kind of really there for
2 the population number.

3 And then I would use that population number, say,
4 to determine, you know, how many legislative districts could
5 Tacoma make up. You know, is it split two ways, three ways,
6 four ways? Does it need to be split that many ways? So to
7 give us an idea of about ways that we can better improve the
8 current map.

9 **Q. All right. And when you say population data, what**
10 **specific data are you referring to?**

11 A. We used all sorts of it prior to the census data
12 coming in.

13 **Q. So when you say "all sorts of it" are you**
14 **referring to total population data?**

15 A. Total population data. Right. I mean, ACS --
16 there's several different datasets that were used for
17 population. I believe the OFM dataset was at one point
18 loaded in. Yeah. Went through a lot of data so it would be
19 hard to say specifically.

20 **Q. What's OFM dataset?**

21 A. They also produce population estimates.

22 **Q. Who are "they"?**

23 A. Oh. The Office of Financial Management.

24 **Q. Okay. Would you look at -- besides total**
25 **population would you also look at voting-age population?**

1 A. Correct. We would; yes.

2 Q. And would you also look at citizen voting-age
3 population or CVAP?

4 MS. GOLDMAN: Objection as to form. Vague.

5 THE WITNESS: Later in the process, yes, that
6 became --

7 BY MS. WAKNIN:

8 Q. So early in the process it would just be total pop
9 and VAP. Why was that?

10 MS. GOLDMAN: Objection. Misstates the testimony.

11 THE WITNESS: We would look at all the data.

12 MS. WAKNIN: Okay.

13 THE WITNESS: I would -- trying to be specific
14 with my phrasing here. I think later in the process CVAP
15 became a much -- more focused on. But we had all the data
16 there to begin with so we did know those numbers when using
17 the original -- or sorry, when using the 2019 ACS data.
18 Yes.

19 BY MS. WAKNIN:

20 Q. How many maps did you draw with 2019 ACS data?

21 A. That would be impossible to say.

22 Q. Do you know if the 2019 ACS provides citizen
23 voting-age population estimates?

24 A. It does.

25 Q. And did you look at those?

1 A. I did.

2 Q. Okay. So we talked about the software that you
3 used to draw maps. Can you just tell me about the
4 guidelines that you had personally when you approached map
5 drawing?

6 MS. GOLDMAN: Objection as to form. Vagueness.

7 THE WITNESS: Can you specify?

8 BY MS. WAKNIN:

9 Q. What would you look at in terms of drawing maps as
10 to the boundaries or guidelines that you would use when
11 guiding how you would draw a map?

12 MS. GOLDMAN: Objection as to form. Vague.

13 THE WITNESS: Right. So I think first off both
14 have constitutional statutory requirements for drawing the
15 districts. So those were clearly of the upmost importance
16 of the guidance that we had. Secondary, commissioner's
17 request of different things. Building off of that, staff,
18 you know, we're in largely a research role in most cases.
19 So exploring other possibilities as well. Yeah.

20 BY MS. WAKNIN:

21 Q. What do you mean by exploring other possibilities?

22 A. You can draw a map a million different ways. So
23 it helps to understand by producing different maps,
24 different potential configurations of the map, you know,
25 most of them not in -- for any serious consideration, but it

1 does help understand how populations have changed and how
2 they've moved and things like that.

3 Especially, like I said earlier, when you change
4 one district you change the other 48. So small changes in
5 one area can mean big changes in other areas that may have
6 unintended consequences.

7 **Q. Okay. So was there any other guidelines besides**
8 **the constitutional statutory commission requests or -- you**
9 **listed one more -- were there any other guidelines that you**
10 **used besides at least those three?**

11 **MS. GOLDMAN:** Objection. Asked and answered and
12 vagueness.

13 **BY MS. WAKNIN:**

14 **Q. You can answer.**

15 **A.** Not that I can recall.

16 **Q. Okay. What did you understand the constitutional**
17 **guidelines were that you had for map drawing?**

18 **MS. GOLDMAN:** I'm going to object to the degree it
19 calls for a legal conclusion.

20 **THE WITNESS:** Yeah. I would have to go back and
21 look.

22 **BY MS. WAKNIN:**

23 **Q. What would you be looking at when you'd go back**
24 **and look?**

25 **A.** Looking at the Constitution.

1 Q. So you would have a Constitution next to you when
2 map drawing?

3 A. No.

4 Q. Okay. So what specifically would you look at to
5 understand what your constitutional duties were for map
6 drawing?

7 A. Again, I'd have to go back and review. It has
8 been some time since this has all taken place.

9 Q. So you don't remember what you looked at.

10 A. I have reviewed the Constitution at the time.

11 Q. Where specifically in the Constitution?

12 A. Again, I'd have to go back and look.

13 Q. Okay. So was there anything else that you
14 understood about your constitutional duties for map drawing?

15 MS. GOLDMAN: And to the degree that your
16 knowledge comes from any attorney-client privileged
17 communication from legislative counsel, I'm going to
18 instruct you not to answer. If your knowledge about the
19 Constitution comes from any other source you may answer.

20 THE WITNESS: Strictly from the document.

21 BY MS. WAKNIN:

22 Q. From the actual Constitution?

23 MS. GOLDMAN: Objection. Asked and answered.

24 THE WITNESS: Yes.

25 BY MS. WAKNIN:

1 **Q. Okay. Who told you to look at the Constitution**
2 **for map drawing?**

3 **MS. GOLDMAN:** Again, I'm going to advise you and
4 direct you not to answer that question to the degree that
5 any such direction came from a lawyer for the legislature.
6 Other than that you may answer.

7 **THE WITNESS:** Myself.

8 **BY MS. WAKNIN:**

9 **Q. How'd you form that belief?**

10 **MS. GOLDMAN:** Again, I'm going to instruct you to
11 the degree that that belief came from attorney-client
12 privileged communication from legislative counsel, I'm going
13 to instruct you not to answer. If that belief came from any
14 other source you may answer.

15 **THE WITNESS:** That we have an obligation to -- we
16 take that into consideration.

17 **BY MS. WAKNIN:**

18 **Q. Did anyone else besides a lawyer tell you to look**
19 **at the Constitution for map drawing?**

20 A. No.

21 **Q. Did any Commission staff tell you to look at the**
22 **Constitution for map drawing?**

23 A. No.

24 **Q. Okay. So no one else; is that correct?**

25 A. Not that I can recall.

1 Q. Okay. What were the statutory requirements as you
2 believed them to be for map drawing under Washington
3 statutes?

4 MS. GOLDMAN: Objection to the degree it calls for
5 a legal conclusion.

6 THE WITNESS: I'm sure I will miss a few.
7 Certainly there are a number of tenets, essentially, that
8 the State statute requires us to draw in the maps,
9 specifically with consideration to contiguity, compactness,
10 understanding communities of interest, keeping those
11 together. Among others I'm sure.

12 BY MS. WAKNIN:

13 Q. What is your definition of -- I can't pronounce
14 it. Continuity or contiguity. There we go. Contiguity.

15 A. Contiguity, yes.

16 Q. There we go.

17 MS. GOLDMAN: I'm going to object to the degree it
18 calls for a legal conclusion.

19 THE WITNESS: My understanding of contiguity would
20 be -- this is always hard to describe in the abstract. A
21 district that is not split into separate, distinct areas in
22 terms of geography.

23 You can't have a district -- one district in two
24 separate -- it's hard to describe in the abstract.
25 Essentially you can't have a district split apart. It has

1 to be all contiguous as one piece, as one whole.

2 Also we consider being able to travel the district
3 all by one -- because you have different modes of
4 transportation. But you can easily drive through the
5 district as well. Drive through, in some cases ferries.
6 Obviously we have a lot of islands here. Districts like the
7 40th, for example. Yeah.

8 **BY MS. WAKNIN:**

9 **Q. Who told you to look at the transportation aspect**
10 **of continuity?**

11 **MS. GOLDMAN:** Contiguity?

12 **MS. WAKNIN:** Contiguity.

13 **THE WITNESS:** Contiguity.

14 **MS. WAKNIN:** Thank you.

15 **MS. GOLDMAN:** It's okay. I'm going to object to
16 the degree it calls for a legal conclusion. I'm also going
17 to -- actually, I strike that objection. I'm going to
18 object and instruct you not to answer to the degree that
19 that information was conveyed to you by a lawyer for the
20 legislature. If that information came from any other source
21 you may answer.

22 **THE WITNESS:** Paul and I had discussed this
23 before, that it had historically been taken into
24 consideration. He had been part of, I think, every single
25 commission process that we ever had here. So that was a

1 recommendation that he gave to me to the best of my memory.

2 **BY MS. WAKNIN:**

3 **Q. Which Paul are you speaking about?**

4 A. Paul Campos.

5 **Q. Thank you. What do you believe compactness to**
6 **mean?**

7 **MS. GOLDMAN:** I'm going to object to the degree it
8 calls for a legal conclusion.

9 **THE WITNESS:** Compactness is trying to draw up a
10 district with all the other considerations in mind; right?
11 These aren't necessarily weighted considerations. In some
12 cases they may be more applicable than others. I would say
13 applicable than others.

14 Let me clarify that. You have to weigh all these
15 considerations when drawing a district. In some -- one way,
16 shape, or form you want to make sure they meet all the
17 criteria.

18 Compactness being keeping the district as compact
19 as possible, not wavering out unnecessarily in picking up
20 communities that don't really belong in that district,
21 drawing strange lines. I'm sure there's plenty of legal
22 interpretations of this. Again, it's an abstract. Hard to
23 describe. But --

24 **BY MS. WAKNIN:**

25 **Q. Were there metrics that you viewed to understand**

1 **compactness on a map?**

2 A. There were compactness measures available on both
3 Dave's and on autoBound Edge as well.

4 **Q. Did you look at those?**

5 A. I had reviewed those.

6 **Q. And what were you looking at when you were**
7 **determining if a district was compact under the definition**
8 **you've given me today?**

9 A. There's specific metrics. Off the top of my head
10 I can't recall. There's a very specific name for it -- for
11 compactness specifically. But also note that there are so
12 many challenges in Washington on compactness -- especially
13 with regards to islands, peninsula -- where that metric may
14 not be as useful as it is in, say, I don't know, Oklahoma.

15 **Q. Did anyone tell you that wasn't a lawyer that that**
16 **was the definition of compactness? The one that you've**
17 **given me today.**

18 A. No.

19 **Q. So that's your own definition; is that correct?**

20 A. These were my own definitions; correct.

21 **Q. Okay. And how did you form that belief on**
22 **compactness?**

23 **MS. GOLDMAN:** I'm going to instruct you that to
24 the degree you formed that based on communications from
25 lawyers for the legislature that you are not to answer that

1 based on the attorney-client privilege. If you formed it
2 from any other basis you may answer.

3 **THE WITNESS:** Statutory requirement.

4 **BY MS. WAKNIN:**

5 **Q. Was it that then from reading Washington statutes**
6 **is how you formed that basis?**

7 **A.** Can you elaborate?

8 **Q. Is there a specific Washington statute that you**
9 **read that defined compactness for you?**

10 **A.** I do not believe it provides a specific definition
11 of compactness in the statute. That and, again, spending
12 time researching this, understanding the metrics available.
13 The ones that I think were provided both on Dave's and
14 autoBound Edge were guiding measures for understanding
15 compactness.

16 **Q. Were there internal discussions between you and**
17 **Paul Graves and/or Paul Campos about a certain level of**
18 **compactness needed for districts?**

19 **MS. GOLDMAN:** To the degree that any lawyer for
20 the legislature participated in those communications I'm
21 instructing you not to answer on the basis of the attorney-
22 client privilege. If no lawyer was present you may answer.

23 **THE WITNESS:** Compactness was certainly something
24 that was considered. Again, along with the other statutory
25 requirements, guidance given. I believe when I just

1 mentioned this that there were some unique issues with
2 compactness in Washington where, again, peninsulas, islands,
3 you know, large bodies of water can skew that number a
4 little bit. But certainly it was taken into account along
5 with the other measures as well.

6 **BY MS. WAKNIN:**

7 **Q. What I'm asking you is did you have an internal**
8 **guideline from either Paul Campos or Paul Graves about what**
9 **the compactness number or score had to be on a district.**

10 A. Not that I'm aware was a number ever set for any
11 given district. Again, it -- a lot of factors play a role.

12 **Q. What were those factors?**

13 A. The facts I listed earlier. Statutory
14 requirements.

15 **Q. You had mentioned commissioner requests as**
16 **something that you considered. What was the process of you**
17 **getting requests from a commission on map drawing?**

18 A. Typically it would be going back and forth. So
19 I'd get, you know, some guidance on, you know, what does it
20 look like if we change X and then try Y. Millions of -- not
21 millions. Lots. Excuse me. I won't talk in hyperbole.
22 Lots of different back and forth on just trying different
23 variables essentially.

24 So it'd typically be, you know, I'll produce a
25 map, maybe two or three, whatever was requested, and then

1 review that with the Commissioner or just speak with him
2 about it. You know, this isn't going to work. This may
3 work. That's typically the back and forth.

4 **Q. What would make something work or not work?**

5 A. Oh boy. That could be different in any given
6 circumstance; you know? I'm trying to find an example here.
7 For example, I think we tried -- coming back to the Cascade
8 issues problem and we had to bring population over. Trying
9 to find multiple ways to handle that population in bringing
10 it over the mountain crest.

11 And, you know, I can't remember specifically at
12 the time, but I do recall that we thought that there might
13 be issues with doing it in multiple different areas. Things
14 like that.

15 We tried, you know, multiple things. Didn't think
16 that would work, so then we go back to, you know, trying it
17 two different ways or three different ways. And obviously
18 we ultimately landed on one or the commissioners all landed
19 on one. But things like that.

20 **Q. How did you receive the feedback from Commission**
21 **Graves?**

22 A. Email, text, call. Things like that.

23 **Q. Did Commissioner Graves share maps that you had**
24 **drawn with him to -- with other folks?**

25 **MS. GOLDMAN:** Objection. Calls for speculation.

1 **THE WITNESS:** Yeah. I couldn't say.

2 **BY MS. WAKNIN:**

3 **Q.** Has there been any instance in which you know that
4 **Commission Graves** shared a map that you had drawn with him
5 or for him with someone outside of the Commission?

6 **MS. GOLDMAN:** Objection as to form.

7 **THE WITNESS:** Outside of the Commission? I'm not
8 aware.

9 **BY MS. WAKNIN:**

10 **Q.** How about inside the Commission? Who did he share
11 maps with?

12 **MS. GOLDMAN:** Objection. Calls for speculation.

13 **THE WITNESS:** Yeah. I couldn't say on every
14 circumstance. But I know obviously we had met -- Paul
15 Campos and myself and Commission Fain -- had met one time, I
16 believe prior to the publishing of the giraffe maps.

17 **Q.** What email accounts did Commissioner Graves use to
18 email you when he gave you feedback about these maps?

19 **A.** Only his State email address to the extent of my
20 knowledge.

21 **Q.** He never used his personal email to provide you
22 feedback.

23 **A.** Not that I can recall; no.

24 **Q.** Did he text message you feedback?

25 **A.** Yes.

1 Q. What was the number that he would text you from?

2 A. I can't remember the number off of my head.

3 Q. Was it his personal number or a work number?

4 A. I believe --

5 MS. GOLDMAN: Objection to -- calls for
6 speculation.

7 BY MS. WAKNIN:

8 Q. You can answer.

9 A. I believe it was his State-issued cell phone.

10 Q. What accounts did you use to email Commissioner
11 Graves with maps?

12 A. My State email address.

13 Q. Was there any other way that you would provide
14 maps to Commission Graves? Not via email.

15 A. We would view them on, like, video chat sometimes.

16 Q. Why would you do that?

17 A. It was a -- screensharing is one of the easiest
18 ways to provide the maps. Obviously it takes a certain
19 level of time to download shape files, share them, spend
20 time getting program -- the program itself set up for him on
21 his computer. That tended to be the easiest way to review
22 maps.

23 Q. Okay. And when you were showing Commissioner
24 Graves maps through screenshare were you showing him maps on
25 autoBound Edge or on Dave's Redistricting?

1 A. Both I believe.

2 Q. How would Commissioner Graves contact you when he
3 wanted you to get on a Zoom to do screenshare on a map?

4 A. Any of the methods mentioned before. Email, text
5 message, things like that.

6 Q. Who else was on the screenshare when you were
7 showing Commissioner Graves maps?

8 A. Only myself and Commissioner Graves to my
9 knowledge. There may have been times Evan was on those
10 calls too. But for the most part it would have just been us
11 three until it came down to -- really down to the wire in
12 terms of the deadline I should say. So closer to the
13 deadline. And then I believe Paul Campos and Commissioner
14 Fain would have been on there as well in some circumstances.
15 Not all circumstances.

16 Q. Okay. And who is Evan again?

17 A. Evan Ridley. He was the communications for
18 redistricting.

19 Q. Why would the communications staffer be on your
20 Zooms with map drawing?

21 A. To understand why we were doing what we were doing
22 essentially.

23 Q. Did he ever give you feedback on a map?

24 A. No. Evan was not involved in the map drawing.

25 Q. It's 11:06. How are you feeling? Do you need to

1 **use the restroom?**

2 A. A glass of water would be great.

3 **MS. WAKNIN:** Okay. Why don't we do another five-
4 minute break? Let's go off the record now. It's 11:06.
5 Let's return at 11:11.

6 **THE REPORTER:** Okay. We are off the record. The
7 time is 11:06 a.m.

8 **(WHEREUPON, a recess was taken.)**

9 **THE REPORTER:** We are ready to go back on the
10 record. We are on the record as of 11:17 a.m.

11 **BY MS. WAKNIN:**

12 **Q. Mr. Grose, who was your direct supervisor that you**
13 **worked under for your redistricting work?**

14 A. That would have been Commissioner Paul Graves.

15 **Q. Okay. Was Commissioner Graves the person that**
16 **hired you?**

17 A. No.

18 **Q. Who did you get hired by?**

19 A. That would have been -- I'm assuming that would
20 have been our Chief of Staff, Lisa.

21 **Q. Can you specify what Lisa you're talking about?**

22 A. Lisa Fenton.

23 **Q. And that's Commissioner Graves's Chief of Staff in**
24 **the legislature?**

25 A. She's Chief of Staff of the House Republican

1 Caucus.

2 Q. Okay. So who are you technically employed by
3 during this -- during the redistricting period?

4 A. The State of Washington.

5 Q. Okay. And specifically did you -- were you
6 official redistricting staff?

7 A. That's correct. Yeah.

8 Q. So you viewed yourself --

9 A. Well, let me clarify. Yes, I was House Republican
10 Caucus staff. State of Washington. So hired by typically
11 the State of Representatives, Washington City -- or House of
12 Representatives. Excuse me. But yes. I was official
13 technically policy staff. And this was the policy I was
14 assigned to I think is the best way to explain it.

15 Q. So did you view yourself as official Washington
16 redistricting staff?

17 MS. GOLDMAN: Objection as to form. Vague.

18 THE WITNESS: Redistrict --

19 MR. HUGHES: Sorry. Objection. Calls for a legal
20 conclusion.

21 MS. GOLDMAN: I'll join in that objection.

22 THE WITNESS: Redistricting staff -- I would
23 consider that to be the Redistricting Commission staff. So
24 the no-partisan staff, support staff, or four-corner staff
25 such as Paul Campos, Ali, Osta Davis, we were caucus staff.

1 So House Republican Caucus as Paul was to the Senate
2 Republican Caucus.

3 **BY MS. WAKNIN:**

4 **Q. And so your supervisor for the time you were doing**
5 **redistricting, were they House caucus -- House Republican**
6 **Caucus staff?**

7 **MS. GOLDMAN:** Objection. Asked and answered.

8 **THE WITNESS:** Right. So I took daily orders,
9 essentially getting work orders essentially from
10 Commissioner Graves.

11 **BY MS. WAKNIN:**

12 **Q. What was the process like in obtaining the job to**
13 **be the official policy staffer for redistricting work?**

14 **A.** To the best of my memory I was approached by my
15 supervisor at the time, who would have been Caleb Heimlich.
16 And he had mentioned that he had gotten a call from -- I
17 can't say -- somebody asking if I'd be interested in the
18 position.

19 And I was naturally intrigued by it, at which
20 point I connected with Lisa. I can't remember when.
21 Sometime, again, to the best of my memory, late 2020. We
22 had connected and went from there. I couldn't, again,
23 provide -- that's the best of my knowledge on that, the
24 hiring process at the time.

25 **Q. And did you know Paul Graves before working with**

1 **him on redistricting?**

2 A. I had met him before, but very briefly. Not in
3 any professional manner really. Yeah.

4 **Q. Did Paul Graves have any reputation around --**
5 **strike that. What was Paul Graves's reputation around --**
6 **among the House Republican Caucus?**

7 **MS. GOLDMAN:** Objection. Calls for speculation.
8 Relevance.

9 **MR. HUGHES:** And lack of foundation.

10 **THE WITNESS:** From my experience he was very well-
11 respected. He was missed. He lost his reelection bid in
12 2018. But he was a pragmatic, solutions-focused guy.
13 Again, from the -- from what I understand anyway.

14 **BY MS. WAKNIN:**

15 **Q. Did you work on the Paul Graves's reelection**
16 **campaign in 2018?**

17 A. I did not.

18 **Q. Do you know folks who did?**

19 A. I do know one; yes.

20 **Q. And did they work with you at all in**
21 **redistricting?**

22 A. No.

23 **Q. Did you predominately work with one person more**
24 **than others when you were doing redistricting work?**

25 A. Paul Campos mainly. Yeah. Let me clarify.

1 Obviously doing -- taking concepts or orders from
2 Commissioner Graves and working on those. But in terms of,
3 like, kind of a coworker, partner, that would have been Paul
4 Campos. Just two different relationships obviously.

5 **Q. Did Paul Campos know a lot about redistricting?**

6 A. Yeah; he did. Paul Campos, as I mentioned
7 earlier, has been around for, I believe, all of the
8 commissions since Washington became a partisan-commission
9 state. Yes; he's very familiar with the process.

10 **Q. What did Paul Campos tell you about redistricting**
11 **in Washington?**

12 A. We had all sorts of conversations about process,
13 structure. I couldn't say specifically. I mean, you'd have
14 to be specific.

15 **Q. Sure. What were the conversations you had with**
16 **him about the process of redistricting in Washington?**

17 A. I know to the best of my memory we had
18 conversations about structure actually being relatively
19 good, even compared to other independent-commission states.
20 That, you know, the maps by nature of being a partisan
21 commission, requiring bipartisanship to pass a map, by
22 nature of that that the overall results were typically not
23 very deviated from previous commissions.

24 And they do change obviously over time by nature
25 of population shifts, by nature of, you know, growing

1 minority populations. I mean, you know, a million small
2 things play a factor there.

3 But overall just giving me historical context
4 about how previous commissions have played out and, I think,
5 general praise for the structure of Washington State's
6 Redistricting Commission.

7 **Q. What did he tell you about how previous**
8 **commissions played out?**

9 A. That it can be stressful toward the end, and that
10 they had, you know, that pretty much it always comes down to
11 the wire. Things like that. I'm sure we talked about other
12 items on previous commissions but those stuck with me.

13 **Q. Did he explain to you at all how the negotiation**
14 **process worked?**

15 **MS. GOLDMAN:** Objection as to form.

16 **BY MS. WAKNIN:**

17 **Q. You can answer.**

18 A. Yeah. Can't remember specifically. But I believe
19 they were all slightly different. The commission in 2011
20 were able to work a little closer together. Everyone on
21 this commission has day jobs as opposed to the previous
22 commission where I don't think any of them did.

23 And obviously during COVID, you know, we were much
24 more virtual-oriented. So those commissioners had, in
25 previous years, had had a bunch more time to work together.

1 You know, just sitting down face-to-face doing negotiations,
2 you know, subjectively probably more effective. Especially
3 in kind of situations like this. So those were some
4 differences.

5 **Q. What are you referring to when you say "situations**
6 **like this"?**

7 A. Oh, the legislative process. Yeah. Just --

8 **Q. Did he tell you anything else about the**
9 **negotiation process?**

10 **MS. GOLDMAN:** Objection as to form.

11 **THE WITNESS:** Nothing that I hadn't already
12 included that comes to mind.

13 **BY MS. WAKNIN:**

14 **Q. How did you understand how the negotiation process**
15 **for the Washington Redistricting Commission for approval of**
16 **maps worked?**

17 A. Can you restate that?

18 **Q. Sure. Actually, could you read that back?**

19 **THE REPORTER:** Yes. Please stand by. My
20 apologies.

21 **(WHEREUPON, the reporter played the record as**
22 **requested.)**

23 **THE WITNESS:** I can go ahead?

24 **MS. WAKNIN:** Yeah.

25 **THE WITNESS:** Okay. I was under the impression

1 that it was going to look different. It could look
2 different than previous years. It may look similar. I
3 don't think there's a -- I don't think there was ever, like,
4 an ironclad understanding of exactly what it would look
5 like. But that was really up to the commissioners on how
6 they wanted to go through that process.

7 **BY MS. WAKNIN:**

8 **Q. Why do you think it -- why would it look different**
9 **than other years?**

10 A. Again, we have a more virtual -- these
11 commissioners had day jobs. They couldn't spend as much
12 time dedicated to purely negotiations, you know, prior to --
13 really close to the deadline I should say. I was under that
14 impression.

15 **Q. Do you know if the Commission adopted any rules**
16 **regarding how negotiations -- the negotiation process should**
17 **be conducted?**

18 A. I don't know if they adopted anything to that
19 effect. I know they discussed some parameters I thought at
20 times. I can't recall specifically.

21 **Q. Okay. We'll talk about the parameters. What were**
22 **the parameters that they had discussed?**

23 A. Those were largely between them. Something I feel
24 like I recall them discussing but I don't remember
25 specifically what the -- those parameters would have been.

1 Q. Were you generally in conversations that the
2 commissioners were -- were you generally privy to
3 conversations the commissioners were having?

4 MS. GOLDMAN: Objection. Calls for -- go ahead.
5 Calls for speculation.

6 MR. HUGHES: And lack of foundation.

7 THE WITNESS: Largely, no. But again, those are
8 -- I wouldn't know for conversations I wasn't on. So --

9 BY MS. WAKNIN:

10 Q. How frequent were your communications with Paul
11 Graves during the redistricting cycle?

12 A. Frequent.

13 Q. Every day?

14 A. Yeah. Probably most days certainly.

15 Q. And would you guys talk multiple times a day?

16 A. It would depend on the day. Sometimes we would
17 just touch base, you know, once -- probably more frequently
18 as we went along in the process. But certainly I'd say --
19 I'd call it frequent certainly.

20 Q. And were there any informal parameters that the
21 Commission had adopted or had commissioned -- strike that.
22 Were there any informal rules that the commissioners had
23 with each other about the negotiation process?

24 MS. GOLDMAN: Objection. Calls for speculation.

25 THE WITNESS: I couldn't say for certain. I don't

1 know.

2 **BY MS. WAKNIN:**

3 **Q. Did Paul Graves tell you how he would conduct**
4 **negotiations during the redistricting process?**

5 A. No. No.

6 **Q. He never spoke to you about how -- his strategy**
7 **for negotiations on the redistricting process?**

8 **MS. GOLDMAN:** Objection. Asked and answered.

9 **THE WITNESS:** We had spoken -- well, I couldn't
10 say so much spoken as I was told, yeah, that there were
11 certain things that he would, you know, like to get. You
12 know, certain things that we knew was of interest to all
13 parties.

14 So in terms of strategy as you put it, loosely.
15 But I think there was a pretty common understanding that
16 whatever the final product was was going to have to be
17 obviously appropriate for all commissioners to approve. So
18 strategy probably wouldn't be the term that I would use so
19 much as finding a path to a consensus.

20 **BY MS. WAKNIN:**

21 **Q. What were the things that Paul Graves wanted to**
22 **get out of this redistricting cycle?**

23 **MS. GOLDMAN:** Objection. Calls for speculation.

24 **MR. STOKESBARY:** Objection. Calls for
25 speculation.

1 **BY MS. WAKNIN:**

2 **Q. You can answer.**

3 A. Yeah. I can't speak to -- again, as a staffer I
4 took orders and produced the maps. Clearly we wanted, as I
5 believe he stated publicly, a competitive map that was good,
6 that offered, you know, voters opportunities to elect
7 candidates that they wanted, that more competition was
8 always going to be better on whatever map was produced. I
9 certainly think that was, again, that's more a question for
10 him.

11 But likely one of what I suspect is one of his
12 larger priorities. Wanted to create more majority-minority
13 districts I believe where it was feasibly certainly. I'd
14 have to go back and really review everything to see exactly
15 what all the parties were at the time. But those were
16 certainly two that I can recall.

17 **Q. Did Paul Graves tell you that there was anything**
18 **in particular that he wanted to get out of the redistricting**
19 **cycle?**

20 A. Nothing, like, absolutely -- if we weren't taking
21 the map we can walk away with it. I'm sure I'm phrasing
22 this correctly. No. I think he was always open to
23 different ideas throughout the process.

24 Again, they had to be items that all four
25 commissioners were going to agree on. So I think, staying

1 confined to that reality, he was open to many different
2 versions of the map.

3 **Q. And did anyone -- did Paul Graves tell you what**
4 **was of interest to all the parties in redistricting?**

5 A. I think there was a pretty common understanding
6 that the political leanings of the districts were going to
7 matter. That's very common in just about every
8 redistricting process. That certainly was one of them.

9 But other priorities were pretty commonly brought
10 up as well. Communities of interest, keeping tribal
11 entities together. That's a really common one that we heard
12 about. Those two immediately come to mind.

13 **Q. And when you say "we heard about" who are you**
14 **referring to? Who's "we"?**

15 A. The Commission. Commission staff. We received
16 lots of public comment.

17 **Q. You mentioned the term "minority-majority**
18 **district" (sic). Is that correct?**

19 A. Correct.

20 **Q. Can you define that term for me as you understand**
21 **it?**

22 A. Right. So that is a district where a majority of
23 the individuals in that district are minority; right? So
24 say a district that is 60 percent Hispanic, for example,
25 that would be a majority-minority district.

1 Q. When you say "minority" can you elaborate on what
2 you mean by that?

3 A. Non-White.

4 Q. Who told you that definition of majority-
5 minority?

6 A. I couldn't -- I can't say.

7 Q. Where did you come up with that definition?

8 A. There are -- I'm certain I must have done lots of
9 research on this particular issue so I couldn't say
10 specifically where I saw that specific definition.

11 Q. And when you're referring to minority-majority
12 (sic) districts, you mentioned population. What specific
13 population are you looking at to deem it a majority-
14 minority district?

15 A. Right. So I think we look at both the voting-age
16 population and citizens voting-age population, which was
17 only available on 2019 estimates. Or most -- prior to the
18 2020 census, the most recent one prior to that would have
19 been the 2019 ACS.

20 Q. When you're talking about the 2019 ACS are you
21 talking about the one-year estimates or five-year estimates?

22 A. I believe they were the one-year estimates, but I
23 cannot recall specifically off the top of my head.

24 Q. And so you would -- to deem a district majority-
25 minority it would either have to have been -- you were

1 looking at -- strike that. So what population would
2 constitute a majority-minority district to you?

3 MS. GOLDMAN: Objection as to form.

4 THE WITNESS: Excuse me. Had a burp. Beginning
5 of the process I think we looked at voting-age population as
6 that was understood at the time, at least in -- as far as I
7 remember at the time, that was to be the metric that we were
8 going to decide what constituted a majority- minority
9 district as I believe was practiced in the 2011 Commission
10 as I understood it. That conversation seemed to have
11 changed going into the 2020 cycle.

12 And again, I cannot recall when we specifically
13 landed on the citizens of voting-age population metric being
14 the deciding metric. I cannot recall. But that did at some
15 point become kind of the barometer by which we'd measure
16 what constitutes a majority-minority district.

17 BY MS. WAKNIN:

18 Q. Who is "we" that you're referring to?

19 A. Commission. Commissioners, Commission staff.
20 Again, I can't recall when that specific decision was made
21 or when those conversations happened. But they kind of
22 evolved over time it seemed like and that became the
23 barometer.

24 Q. Did you take notes during meetings that you had
25 with Commissioner Graves?

1 A. Sometimes I may have.

2 Q. Was it a practice of yours to take notes during
3 meetings with Commissioner Graves?

4 A. If they were relevant notes, like really specific
5 things, I suppose I would have. Doesn't seem like it right
6 now, but typically I have a pretty good memory. So --

7 Q. This definition of minority-majority (sic)
8 district changing from VAP to CVAP -- what was the impetus
9 for that?

10 A. Again, I can't recall specifically what would have
11 started that or what would have helped that conversation
12 evolve. There was a point in time that that became, like I
13 said, the barometer by which we measured that at, but I
14 couldn't say specifically.

15 Q. When you had this term, majority-minority
16 district, did you express that definition publicly at all as
17 to what the commissioners meant by it?

18 MS. GOLDMAN: Objection as to form. Vague.

19 THE WITNESS: Can you say that one more time.

20 BY MS. WAKNIN:

21 Q. Sure. So let me rephrase. As you understand
22 majority-minority districts, you said that there was a time
23 when you thought it was one thing, majority-minority of --
24 majority of the minority -- majority of the district was
25 minority voting-age population. That's what you thought at

1 one point; is that correct?

2 A. That is correct.

3 Q. Okay. And then it changed to a majority of the
4 population was minority citizen voting-age population; is
5 that correct?

6 A. Yes.

7 Q. Okay. Did you ever make any of these definitions
8 public?

9 MS. GOLDMAN: Objection as to form. Vague.

10 THE WITNESS: I was not in a public-facing role.
11 I did not; no.

12 BY MS. WAKNIN:

13 Q. Did you ever go to public meetings on behalf of
14 the commissioner -- of Commissioner Graves?

15 A. Not on his behalf, but I did attend public
16 meetings.

17 Q. Did the commissioners ever adopt formal
18 redistricting criteria during any public meetings that they
19 had had?

20 A. Not that I can recall. Again, they thought there
21 was proposed guidelines. I can't specifically remember what
22 they were for. I'm sure you can review the public meetings
23 for that. But not that I can recall.

24 Q. Okay. And so when did CVAP become the barometer
25 for majority-minority districts during the map drawing

1 **process?**

2 A. I can't recall specifically when. Yeah. It was
3 later in the process I want to say. But again, I can't say
4 specifically.

5 **Q. Was it after October 2021?**

6 A. I couldn't say specifically. Yeah.

7 **Q. So did you have any personal goals for this**
8 **redistricting cycle that you were a part of?**

9 A. I'm purely legislative staff. I take orders and
10 do my best to execute on the orders given. So I'm going to
11 clarify. No; I had no personal goals. I thought this was a
12 unique opportunity and a -- it has become quite a burdensome
13 process. But no. No other goals than getting experience.

14 **Q. Did anyone express to you any goals that they had**
15 **had for the -- of the 2021 redistricting process?**

16 **MS. GOLDMAN:** Objection as to form. Vague.

17 **THE WITNESS:** Other than what I understood
18 Commissioner Graves's goals to be that I highlighted
19 earlier, no.

20 **BY MS. WAKNIN:**

21 **Q. And Commissioner Graves told you those goals that**
22 **he had.**

23 **MS. GOLDMAN:** Objection. Asked and answered.

24 **THE WITNESS:** I believe he stated those goals
25 publicly, although I could be wrong. I'd have to -- again,

1 had lots of different conversations about lots of different
2 things throughout this process. Those were goals that,
3 again, I either inferred or he had mentioned at some point
4 in time. Again, cannot say for sure.

5 **BY MS. WAKNIN:**

6 **Q. Okay. So when did you all as a -- strike that.**
7 **What was the public introduction of any legislative maps?**
8 **What was that process like?**

9 **MS. GOLDMAN:** Objection as to form. Vague.

10 **THE WITNESS:** Yeah. Can you be more specific?

11 **BY MS. WAKNIN:**

12 **Q. Were there maps that were introduced to the public**
13 **by the commissioners?**

14 **A.** By the Redistricting Commission, yes.

15 **Q. What was the process of having an internal map**
16 **become one that was publicly available?**

17 **A.** So much like Commissioner Graves and I worked
18 together. Throughout the whole process he, you know, had
19 seen different drafts, different possibilities, things that
20 he would like to see in a final map.

21 By that process we would then, you know, take a
22 really, really close look at, you know, some of the details
23 of the map. At which, you know, he decided that he had
24 everything he wanted I'm assuming. Again, his decision to
25 ultimately publish the map, by which we would send that to

1 the Commission and then they would post it publicly.

2 Commission staff. Excuse me.

3 **Q. How many maps were commissioners allowed to**
4 **publicly introduce?**

5 A. I suppose they could do as many as they had
6 wanted. There was one formally agreed-upon release for
7 maps. Allegedly this has been standard practice for the
8 Commission in previous years, so I suppose they could do
9 multiple ones if they had wanted. But there was one kind of
10 coordinated release by the Commission for draft maps.

11 **Q. Were there any maps that were provided that were**
12 **like a benchmark plan?**

13 **MS. GOLDMAN:** Objection as to form. Vague.

14 **THE WITNESS:** Yeah. Can you specify?

15 **BY MS. WAKNIN:**

16 **Q. What do you mean "specify"?**

17 A. What do you mean by benchmark?

18 **Q. Okay. Did you all view the 2011 redistricting map**
19 **as the benchmark map to compare your legislative districts**
20 **to?**

21 **MS. GOLDMAN:** Objection as to form. Vague and
22 calls for speculation. Lack of foundation.

23 **BY MS. WAKNIN:**

24 **Q. You can answer.**

25 A. Certainly districts as they had previously been

1 drawn certainly have an impact on the new map being drawn.
2 I think all sides realized that, that there's certain
3 historical importance to that, that things that were made
4 previously in 95 percent of the cases still make sense.

5 Again, not in every circumstance. Obviously there
6 are currently-elected officials in those districts which is
7 a, you know, consideration that everyone takes into account;
8 right?

9 I don't think it behooves anyone to be un-
10 electing officials as commissioners; right? Those were duly
11 elected officials. I think that was certainly a
12 consideration. So in that way I suppose you could call that
13 a -- I wouldn't call it a benchmark necessarily. But
14 certainly historical precedent plays a role.

15 **Q. Was there a -- how many public maps were**
16 **introduced by the Commission?**

17 **MS. GOLDMAN:** Objection as to form. Vague.

18 **THE WITNESS:** Six that I'm aware of.

19 **BY MS. WAKNIN:**

20 **Q. Can you list them?**

21 A. There had been one from the House Republican
22 Caucus, one from the Senate Republican Caucus, and there
23 would have been two from the House Democratic Caucus and two
24 from the Senate Democratic Caucus.

25 **Q. And was public comment given on those maps?**

1 A. Public comment was given on those maps; yes.

2 Q. And did you attend any of the public comment on
3 those maps?

4 A. Yeah. They trickled in over time. It wasn't just
5 in-person testimony during commission meetings. It was also
6 given via the online platform the Commission had set up.

7 Q. When was the first map by Commissioner Graves
8 introduced?

9 MS. GOLDMAN: And just to be clear, Counsel, when
10 you say "introduced" you mean dispersed or distributed
11 through the portal?

12 MS. WAKNIN: When I mean introduced, I mean
13 publicly introduced. Provided to the public. I understand
14 that there were internal maps.

15 BY MS. WAKNIN:

16 Q. So when was the first -- strike that. When was
17 the first public map introduced by Commissioner Graves?

18 A. I couldn't remember the specific day. It would
19 have been whenever the uniform commissioned release was.

20 Q. Okay.

21 A. Yeah.

22 Q. When you're thinking about the timeline of your
23 work in the Redistricting Commission how would you split up
24 the different sections of the cycle? Of the redistricting
25 cycle.

1 A. Really I suppose in two ways would be the best way
2 to describe it. Prior to census data release and post-
3 census data release. I suppose you could add, you know,
4 preparation for releasing draft maps, but I kind of consider
5 that the first part.

6 The process is -- although those dates, I don't
7 believe, align perfectly. But pretty much a two-part
8 process. It's kind of preparation, getting draft maps
9 ready, and then working on the second part after we have
10 census data and draft maps are released, working on finding
11 consensus on a final map.

12 **Q. And during that draft map process before the**
13 **census data released you were using the 2019 ACS. Was it**
14 **the one-year ACS estimates or the five-year?**

15 **MS. GOLDMAN:** Objection. Asked and answered.

16 **THE WITNESS:** Yeah. Again, I cannot recall
17 specifically. And we used lots of different kinds of
18 population estimates at that time. Again, we had OFM
19 estimates, other estimates as well. I can't specifically
20 recall. But it was not just 2019 ACS.

21 **BY MS. WAKNIN:**

22 **Q. Were you looking at CVAP data for the draft maps**
23 **before the census release?**

24 **MS. GOLDMAN:** Objection. Asked and answered.

25 **THE WITNESS:** We had all that data available. So

1 I'm certain it was a consideration at the time. Yeah.

2 **BY MS. WAKNIN:**

3 **Q. Let's talk about the period after the census data**
4 **gets released. So why don't you walk me through the day the**
5 **census data gets released? What was that day like?**

6 A. That was mostly technical, getting it uploaded
7 into Edge. That's about the day, I think, watched -- the
8 census had a press conference the day before. So right
9 around that time it was released, which is really helpful in
10 understanding, you know, what was included, what the
11 ultimate results of the census were, just getting a grasp on
12 what was included.

13 I think there was, like, a feeling of just, you
14 know, wanting to -- now that we finally have the data -- it
15 came in late -- now we can finally get it uploaded and kind
16 of re-go through this process of refamiliarizing yourself
17 with the data at hand. Because obviously we hadn't had that
18 dataset at the time.

19 It still had to go through prisoner reallocation.
20 Or the incarcerated reallocation. Excuse me. So we knew
21 that that wasn't going to be the final dataset, but we knew
22 it would be very similar to the final dataset that we would
23 use to draw the maps.

24 **Q. When did you get the final dataset to draw the**
25 **maps?**

1 A. I couldn't say specifically. I do know it took
2 some time to do the reallocation process, which is, you
3 know, really, really technical. That's something the
4 Commission staff did. But I couldn't say for sure.

5 Q. Okay. When you had -- was there one draft map
6 that Commissioner Graves liked more than the other draft
7 maps that you had drawn?

8 MS. GOLDMAN: Objection as to form. Calls for
9 speculation.

10 THE WITNESS: Yeah. I couldn't say.

11 BY MS. WAKNIN:

12 Q. Did he express --

13 A. Yeah.

14 Q. -- to you any map that was a preferred map for him
15 that you had drawn besides -- and over other maps that you
16 had drawn?

17 A. I'm assuming -- again, this is an assumption -- I
18 can't speak for Commissioner Graves -- that the map that he
19 ultimately landed on for draft maps would have been his
20 preferred map. But again, he -- nothing would have led me
21 to believe otherwise.

22 Q. Did you have that map drawn prior to the census
23 data release? The one that was publicly introduced.

24 A. Again, I can't --

25 MS. GOLDMAN: Objection. Vague.

1 **BY MS. WAKNIN:**

2 **Q. You can answer.**

3 A. Sorry. I'll start being slower. I cannot recall
4 specifically whether we released draft maps prior to or
5 after the census data release so I can't say for sure.

6 **Q. What did you do with all those draft maps once you**
7 **got the census data?**

8 **MS. GOLDMAN:** Objection as to form. Vague.

9 **THE WITNESS:** Those were mostly -- I mean, they're
10 drawn on different datasets so they're not really applicable
11 to the final product that we had. Mostly started from
12 scratch if I remember correctly. But, you know, we produced
13 all sorts of drafts, whether complete, incomplete. Yeah.
14 My recollection is that we started from scratch.

15 **BY MS. WAKNIN:**

16 **Q. What software did you use when you were starting**
17 **from scratch after the census data gets released for draft**
18 **map -- for map drawing?**

19 A. Mostly Edge. Edge was what we knew we were going
20 to produce the product with so it seemed, you know, now that
21 we have the data that we're actually going to use it seemed
22 to make the most sense to draft on there.

23 Our counterparts were largely using Dave's. So I
24 had drawn maps on Dave's as well, but mostly Edge because
25 that's what we were going to have to ultimately use to

1 produce the final maps.

2 Q. Can you explain to me what happened between the
3 census data release and then that first map that is
4 produced? And I'm going to represent to you it was made
5 publicly available on September 21, 2021. Do you have any
6 reason to dispute that?

7 MS. GOLDMAN: What was made public?

8 MS. WAKNIN: The first Graves' draft -- first
9 Graves' public map.

10 MR. STOKESBARY: Objection as to form. Compound
11 question. Vague.

12 THE WITNESS: I don't know what date it was
13 released so I can't say for sure.

14 BY MS. WAKNIN:

15 Q. What happened after Commissioner Graves introduced
16 publicly his first mapping proposal?

17 MS. GOLDMAN: Objection --

18 MR. STOKESBARY: Objection as to form. Vague.

19 MS. GOLDMAN: Join in the objection.

20 BY MS. WAKNIN:

21 Q. You can answer.

22 A. We received public comments on the maps and then
23 wanted to move forward into negotiations on a final map.

24 Q. What were the public comments you received on that
25 map?

1 A. Both positive and negative. Mostly partisan.
2 Partisans take a pretty strong interest into this process.
3 That's most of it I would say.

4 **Q. Did you meet with any community groups after**
5 **releasing -- after Graves had released his public map?**

6 A. Community groups? We did have one meeting. Gosh,
7 and I cannot remember what the group is called. We did have
8 a meeting with a community group concerned with
9 redistricting. And I don't know if it was before or after.
10 Just I know we had a meeting at some point in time.

11 **Q. What was the community group that you had met**
12 **with?**

13 A. I remember Redistricting Justice.

14 **Q. What'd they meet with you about?**

15 A. Did you say what or when?

16 **Q. What did they meet with you about?**

17 A. Oh, what did they meet with us about. Oh, they
18 just wanted to let us know things that they were looking for
19 in a map, things that they were concerned about. One thing
20 that really came to mind that they were really adamant about
21 was the Ninth Congressional District. So not the
22 legislative district map. They were very concerned about
23 the Ninth Congressional District and majority- minority
24 districts in general.

25 **Q. When was that meeting?**

1 A. I couldn't say specifically.

2 **Q. Who attended that meeting?**

3 A. Commissioner Graves and myself and members of
4 their organization.

5 **Q. Do you remember what members of their**
6 **organization?**

7 A. Andrew Yang is the only one that I can recall. He
8 was a very frequent commenter on the Redistricting
9 Commission so I remember that one.

10 **Q. Was Redistricting Justice the only community group**
11 **that you had met with during the redistricting process?**

12 A. I believe so.

13 **Q. Did other groups ask for meetings with**
14 **Commissioner Graves?**

15 A. Not that I can remember. If we were invited
16 somewhere, I'm assuming we would have gone.

17 **Q. Did you meet with any legislators regarding**
18 **Commissioner Graves' first public-released map?**

19 A. I don't know if it was about the released map. I
20 do know that we scheduled times to meet with as many House
21 Republican Caucus members as we could. I can't remember if
22 it was about the released draft map or if it was more
23 informational. I cannot recall.

24 **Q. Did any of the legislators you met with express**
25 **any interest in talking about the 14th and 15th legislative**

1 **districts?**

2 A. I can't recall specifically the meetings with
3 those members. No; that didn't stand out as a topic of
4 conversation.

5 **Q. The incumbents of those districts -- of the**
6 **legislative district 14 or 15 didn't speak to you about**
7 **their votes redistricting of legislative district 14 and 15?**

8 A. We met with 40 members. I just can't recall
9 specifically those meetings.

10 **Q. Did you take notes during those meetings?**

11 A. Sometimes. Usually not. We were just receiving
12 general feedback most of the time. Most of the time there
13 was no issues at all. Sometimes they would say, you know,
14 "Well, you know, it makes sense if we add X, Y, and Z
15 precinct." Sometimes they really didn't have any opinion at
16 all about some of the changes. Or potential changes I
17 should say.

18 **Q. Did Redistricting Justice Washington make any**
19 **requests related to the legislative districts 14 or 15?**

20 A. I'm assuming that they also were concerned about
21 creating a majority-minority district around the Yakima
22 Valley area. I can't recall specifically what their -- all
23 their concerns were. But that seems like something that
24 they would have been concerned about.

25 **Q. What was the general attitude from yourself**

1 **towards Redistricting Justice?**

2 **MS. GOLDMAN:** Objection. Vague and relevance.

3 **THE WITNESS:** My personal attitude?

4 **MS. WAKNIN:** Yeah.

5 **THE WITNESS:** Well, I think it's important to note
6 that early on -- and they had removed it from their website
7 -- they were affiliated with Washington State Democratic
8 Party. So naturally, you know, we -- speaking for myself, I
9 would have expected a certain political tint to whatever
10 proposals that they may have had.

11 That being said, I think that our values in many
12 ways align and that we might have different interpretations
13 of exactly what that means in certain areas, but certainly I
14 think from a spirit perspective there were mutual areas of
15 agreement that I thought that we could potentially land on.

16 **BY MS. WAKNIN:**

17 **Q. What were the mutual areas of agreement?**

18 A. I think in particular as one of their major
19 concerns, you know, were creating majority-minority
20 districts where they could be made. That's certainly
21 something that, you know, we -- Commissioner Graves
22 attempted to do in his draft map. It was something we tried
23 to do -- something that we took into, you know, final
24 negotiations with that was something that we considered.

25 And I thought that was good overlapping --

1 overarching goal I should say. You know, again, with
2 different interpretations of what is and what isn't possible
3 on a map is pretty subjective. But I thought that was
4 something we aligned.

5 **Q. How do you know they took their affiliation, as**
6 **you allege with the Democratic Party, off their website?**

7 A. Can you restate that one more time?

8 **Q. How do you know that this group that you allege**
9 **had an affiliation with the Democratic Party took it off**
10 **their website?**

11 A. When we first had heard of the group I looked at
12 the website to gather information obviously. That's
13 something, you know, clearly I notice when I look at
14 different groups affiliated with that group.

15 I kind of assume they're kind of a big umbrella.
16 Again, I can't speak for how their structure works. But
17 that was one of them listed. And if I recall correctly that
18 was later removed from the website. That's my recollection
19 on that.

20 **Q. Do you have any evidence besides the website that**
21 **may or may not have this affiliation that this group is**
22 **affiliated with the Democratic Party?**

23 A. No. That was it.

24 **MR. HUGHES:** Object to form.

25 **BY MS. WAKNIN:**

1 Q. Okay. When you talk about Commissioner Graves and
2 minority-majority (sic) districts what was the overall --
3 what did Commissioner Graves express to you about majority-
4 minority districts?

5 A. We had lots of conversations on both majority-
6 minority districts and lots of other aspects of
7 redistricting so it's hard to recall specifically what any
8 specific ones of those conversations looked like.

9 That being said, it certainly was a goal. We saw
10 that the census data when it came in showed a pretty
11 expansive growth of minority populations in Washington so we
12 thought that was a good opportunity to include more
13 majority-minority districts. We certainly had the feeling
14 that that was something our counterparts were also going to
15 look for and a good area of consensus.

16 Q. How'd you go about making that goal a reality?

17 A. Can you restate the question?

18 Q. How did you as a map drawer go about making
19 Commissioner Graves's goal regarding the majority-minority
20 districts a reality?

21 MS. GOLDMAN: Objection as to form. Vague.

22 THE WITNESS: Yeah. We spent quite a bit of time
23 looking at, you know, where the more dense minority
24 communities are, where we can create a compact, contiguous
25 majority-minority district, you know, what the impacts on

1 surrounding districts would have been in those situations.

2 Again, when you're drawing one sole district you can do lots
3 of interesting things but there's obviously big impacts to
4 the communities around them.

5 So this is just part of the time that I spent, you
6 know, researching was trying to figure out, you know, where
7 these specific areas are, do they make sense in terms of a
8 district that we could include on the final map.

9 So that and performing that and kind of advising
10 to Commissioner Graves, you know, where we might have some
11 of those opportunities, where we might not. So that was, I
12 would say, the role that I played in that.

13 **BY MS. WAKNIN:**

14 **Q. Where are minority communities in Washington**
15 **located?**

16 **MR. HUGHES:** Object to form.

17 **BY MS. WAKNIN:**

18 **Q. You can answer.**

19 A. Yeah. Really mostly concentrated in the Puget
20 Sound region largely. Obviously there are large Hispanic
21 populations in Grant County, Benton County, Yakima County.
22 Adams County as well on the east side of the state. I think
23 that -- yeah. Puget Sound pretty broadly. But yeah.
24 Really up and down the I-5 corridor in the Central Southern
25 Puget Sound. Yeah.

1 Q. Is there a large Latino population that you know
2 of in Franklin County?

3 A. Yes.

4 Q. How do you these are where -- how do you know for
5 Benton, Grant, Yakima, Adams, and Franklin have large Latino
6 populations?

7 A. How do I know?

8 Q. Yes.

9 A. Oh. The census data is indicative of that.

10 Q. Did you ever look at any racial heat maps of this
11 area?

12 A. I had previously; yes.

13 Q. When?

14 A. I couldn't say when precisely.

15 Q. Did you look at them -- a racial heat map -- a few
16 times?

17 A. I think so. Yeah. We had looked at a lot of
18 maps.

19 Q. Was racial shading available on autoBound Edge?

20 A. On autoBound I believe that was -- I believe so.

21 Q. Did you look at racial shading?

22 A. Not on autoBound Edge.

23 Q. So where did you look at it?

24 A. There was available data online somewhere I want
25 to say. We were able to look at that. Sorry. It was a

1 while ago. I can't say specifically.

2 **Q. Did you look at racial shading on Dave's**
3 **Redistricting?**

4 **A.** I wasn't sure if that was even available on Dave's
5 Redistricting. It may be. And so no; not that I can
6 recall.

7 **Q. And what makes you believe that racial shading was**
8 **available on autoBound Edge?**

9 **MS. GOLDMAN:** Objection. Misstates the testimony.

10 **THE WITNESS:** I believe that was a tool available
11 on that program.

12 **BY MS. WAKNIN:**

13 **Q. And for Dave's you did look at racial data on**
14 **Dave's; is that correct?**

15 **A.** Correct.

16 **Q. When making majority-minority districts how did**
17 **you go about assessing the metrics of the district?**

18 **MS. GOLDMAN:** Objection as to form. Vague.

19 **THE WITNESS:** Can you describe what specific
20 things you're talking about?

21 **BY MS. WAKNIN:**

22 **Q. We talked earlier about the Constitution, about**
23 **State guidelines, State statutory guidelines. We talked**
24 **about communities of interest. So how would you define a**
25 **metric of a district? Let's start there.**

1 **MS. GOLDMAN:** Objection as to form. Vague.

2 **THE WITNESS:** Yeah. I don't know if there's any
3 single metric by which you can define a district. It'd be
4 take all things in totality.

5 **BY MS. WAKNIN:**

6 **Q. When you look at a district what are the different**
7 **elements of the district that you're looking at it?**

8 **MR. HUGHES:** Objection. Vague.

9 **THE WITNESS:** Right. Looking at municipal
10 boundaries, school district boundaries, counties,
11 compactness, contiguity, surrounding communities of interest
12 -- specifically in the Yakima County, say the Yakima nation
13 was something we heard multiple times in public comment, and
14 then obviously other public comments to that effect that we
15 have to take into account as well.

16 So there are political leanings of the district;
17 right? All sorts of different things across the board. And
18 again, you know, not just one district but understanding
19 that in the totality of the map and how all those individual
20 things play a role in any given district.

21 **BY MS. WAKNIN:**

22 **Q. Did you look at electoral performances of**
23 **legislative districts?**

24 **A. Yes.**

25 **Q. Was that for every district?**

1 A. For every district, yes.

2 Q. And what was your thought process when you were
3 analyzing electoral performance of districts?

4 A. What do you mean by "thought process"?

5 Q. What did you care about when you looked at
6 electoral performances of districts?

7 MS. GOLDMAN: Objection as to form. Vague.

8 THE WITNESS: Looking at them in totality was
9 important. I don't think for any specific district there
10 was ironclad one way or another about how we felt about it.
11 But certainly in totality of the map that there was more
12 fair outcomes than more biased outcomes either way. So we
13 really took it in totality. I don't think for any given
14 district -- no one district had to lean one way or lean the
15 other way or be competitive.

16 I think -- again, this is speculating on how
17 Commissioner Graves felt -- that competitiveness was going
18 to be important. And so that, I think, was kind of how I
19 adopted my view on looking at the map in totality.

20 BY MS. WAKNIN:

21 Q. How would you define "competitiveness"?

22 A. Races that we had landed on using -- I want to say
23 it was the 2020 Treasurer's Race as kind of a baseline
24 partisan metric that we could use to judge these districts.
25 And I can't remember off the top of my head if it was five

1 points in either direction or three points. But some kind
2 of system like that.

3 **Q. What is competitiveness of a district?**

4 A. Oh, meaning that the district could be won by
5 Republicans or Democrats in any given year.

6 **Q. Who told you that definition?**

7 A. That is my definition.

8 **Q. How did you --**

9 A. Let me clarify. Which definition?

10 **Q. That --**

11 A. Because we've talked about this at length. That
12 it could be won by any given party in any given year?

13 **Q. Correct.**

14 A. That's my definition.

15 **Q. And how did you come to form that definition?**

16 A. Through experience. Just being around campaigns
17 for long enough.

18 **Q. And you were the Political Director of the**
19 **Republican House campaign?**

20 A. Washington State Republican --

21 **Q. Washington --**

22 A. -- Party.

23 **Q. Wait. Can you repeat that? Sorry.**

24 A. Washington State Republican Party.

25 **Q. Okay. So you're fairly familiar with electoral**

1 **performance; is that fair to say?**

2 A. Yes, in answer to that.

3 **Q. Do you currently work for the Republican --**
4 **Washington Republican Party?**

5 A. I do not; no.

6 **Q. Where do you currently work?**

7 **MS. GOLDMAN:** Objection. Asked and answered.

8 **THE WITNESS:** I work for the House Republican
9 Caucus and Washington State House of Representatives.

10 **BY MS. WAKNIN:**

11 **Q. Why was either plus five or plus -- plus or minus**
12 **five or plus or minus three -- how was that settled on as a**
13 **-- what made something competitive?**

14 A. There's lots of conversations to that effect
15 between Commissioner Graves and Commissioner Simms. And
16 again, I can't recall specifically which one was landed on.
17 But those were evolving discussions. What I can speak to is
18 that it was important that we all had one metric that we
19 could agree upon that we could look at to assess the
20 districts.

21 **Q. Was that metric made public?**

22 A. I believe it was.

23 **Q. When?**

24 A. I can't say exactly when. I don't know if it was
25 before or after the maps were released. I can't say

1 specifically. But I do recall seeing news articles with
2 that included if memory serves me right.

3 **Q. What news articles?**

4 A. Melissa Santos did quite a bit of covering of
5 redistricting. That would be my best guess. Again, I can't
6 say for sure. But I would imagine that she would have
7 written something to that effect.

8 **Q. What's a fair outcome for a competitive district?**

9 **MS. GOLDMAN:** I'm going to object to the degree it
10 calls for a legal conclusion.

11 **THE WITNESS:** Sorry. Can you restate that?

12 **BY MS. WAKNIN:**

13 **Q. Before you had mentioned competitiveness in**
14 **adjacent to fair or biased outcomes. Can you elaborate on**
15 **what you mean by a fair outcome?**

16 **MS. GOLDMAN:** Same objection instruction.

17 **THE WITNESS:** I think there's a certain amount of
18 subjectivity to that. What's fair to you might be different
19 than what's fair to me than what's really fair. I do think
20 gaining or losing seats purely on arbitrary line drawing
21 wasn't something that -- I suspected that neither side was
22 very interested in.

23 **BY MS. WAKNIN:**

24 **Q. What do you think is fair?**

25 **MS. GOLDMAN:** Objection as to form. Vague.

1 **BY MS. WAKNIN:**

2 **Q. You can answer.**

3 **A. Depends on the context.**

4 **Q. In this context that you've just mentioned what**
5 **did you think was fair?**

6 **MS. GOLDMAN:** Objection as to form.

7 **THE WITNESS:** I thought a fair outcome likely
8 means that there were not going to be overwhelming political
9 changes based on redrawing the maps. Again, this is in
10 totality, not in a specific district.

11 When we look at statewide performance and held
12 seats, we have a, you know, lots of data on, you know, what
13 percentage of individuals may choose one party over another
14 party in any given year.

15 So understanding that that representation, those
16 individuals who affiliate one way or another, don't
17 affiliate at all, and making sure that's reflective of the
18 final composition of the legislature is, in my opinion,
19 probably the most fair outcome. But again, I, you know, I
20 do the technical work. I don't get to make these decisions.

21 **BY MS. WAKNIN:**

22 **Q. Did Commissioner Graves ever tell you what he**
23 **thought would be a fair outcome?**

24 **A. I'm certain we probably had conversations to --**
25 **maybe in relation to that effect. I don't know that fair**

1 was ever somewhat -- was ever the discussion. I think we
2 were looking at a map that all four commissioners would vote
3 on.

4 **MR. HUGHES:** Sonni, when you get about to a
5 stopping point, it's about lunchtime.

6 **MS. WAKNIN:** Let's go until 12:30.

7 **BY MS. WAKNIN:**

8 **Q. What's an overwhelming political change? How**
9 **would you characterize that?**

10 **MS. GOLDMAN:** I'm sorry. Can I have that question
11 read back, please?

12 **(WHEREUPON, the reporter read the record as**
13 **requested.)**

14 **THE WITNESS:** I would characterize that by saying
15 that purposeful manipulation of the lines to favor one party
16 or another, which would result in kind of overwhelming
17 political change not through any votes being cast but purely
18 through the drafting of maps.

19 **BY MS. WAKNIN:**

20 **Q. So let's dig a little deeper on that. When you**
21 **talk about overwhelming political change are you -- do you**
22 **understand it to be the gaining or losing seats for a**
23 **particular party?**

24 **A. Potentially. I also think purposefully**
25 **districting out members, which doesn't naturally happen.**

1 It's not something that, you know, map drawers can always
2 control nor is it in the best interest of the district.

3 Again, guided by the general redistricting
4 principles it's always a bad thing. But it certainly can
5 happen for reasons beyond what is necessary. So I'd also
6 consider that to be part of that conversation.

7 **Q. What do you mean by "purposefully districting out"**
8 **a member?**

9 A. That would result in -- or sorry. Excuse me. Let
10 me restart here. That would be purposefully excluding a
11 member, whether your own member, another member from
12 opposing party, whatever it might be, any elected
13 legislative member from a district when it was not
14 absolutely necessary to do so. I think that would answer
15 your question.

16 **Q. What would make something absolutely necessary?**

17 A. We have a lot of natural boundaries here in
18 Washington. So as population grows or the lack of growth
19 results in districts expanding, contracting -- and obviously
20 we're limited by natural boundaries and state boundaries as
21 well. So there are some circumstances where some things are
22 -- can't say always avoidable -- but in a practical sense
23 for mapping reasons pretty unavoidable.

24 **Q. Any other reason?**

25 **MS. GOLDMAN:** Object as to form.

1 **THE WITNESS:** Not that comes to mind at the
2 moment; no.

3 **BY MS. WAKNIN:**

4 **Q. Was gaining or losing seats for the Republican**
5 **Party a concern of Commissioner Graves that he told you?**

6 A. Certainly the -- as I mentioned, the totality of
7 the political leanings of the map was going to be important.
8 It's important to us because we knew it was important to the
9 other three corners as well, which in itself had produced
10 what I'd categorize as a somewhat fair outcome.

11 **Q. Can you elaborate on what you mean by a somewhat**
12 **fair outcome?**

13 A. That the final maps produced in totality generally
14 reflected politically worthy previous maps -- where they
15 were politically. Not identical by any means. And again,
16 on a district-by-district basis that changes. But in
17 totality I thought it was reflective. Again, me. I thought
18 it was reflective of where the state sits politically.

19 **Q. Did you use a particular metric to measure**
20 **fairness?**

21 A. Not one particular metric, no.

22 **Q. Were there many metrics?**

23 A. We took lots of metrics into consideration on any
24 given district or in totality of looking at the districts.
25 There's lots of different ways to view a map on an

1 analytical basis.

2 Q. Okay. So I want to go back. We'll talk about
3 analytical basis and the ways you can view a map. But I
4 want to go back and talk about fairness as a metric. What
5 were the particular metrics to measure fairness?

6 MS. GOLDMAN: I want to be clear, Counselor. Are
7 you asking him for his opinion --

8 BY MS. WAKNIN:

9 Q. For your opinion.

10 MS. GOLDMAN: So this is not anybody else's or the
11 process. This is just his general opinion to be clear.

12 MS. WAKNIN: Yes.

13 MS. GOLDMAN: Okay.

14 THE WITNESS: Sorry. Can you repeat the question?

15 BY MS. WAKNIN:

16 Q. Was there a -- strike that. Was there a metric
17 that you used during your work on the Redistricting
18 Commission to measure fairness?

19 MS. GOLDMAN: Okay. That's a different question
20 to be clear. This is not --

21 MS. WAKNIN: I'm asking a different question now.

22 MS. GOLDMAN: Okay. Thank you, Counsel.

23 THE WITNESS: Again, I don't think there's a
24 single metric by which we judge fairness. And just my
25 opinion of fairness is that fairness is a pretty broad term

1 or subjective term.

2 The way that I would look at the map, certainly
3 political results -- again, not by any specific district but
4 by totality. Kind of looking at which districts go one way
5 or go another, which ones are competitive, how many are not
6 competitive. That certainly plays a role in that.

7 Which districts were drawn maybe not in accordance
8 with the redistricting guidelines given via statute; right?
9 Or at least not compact, not contiguous. That all plays a
10 role into fairness.

11 **BY MS. WAKNIN:**

12 **Q. But nothing specific to fairness.**

13 **MS. GOLDMAN:** Objection --

14 **BY MS. WAKNIN:**

15 **Q. You can answer.**

16 **MS. GOLDMAN:** -- as to form. Misstates the
17 testimony.

18 **THE WITNESS:** Yeah. Again, fairness in and of
19 itself -- I think you have to include all sorts of different
20 metrics to judge that, so --

21 **MS. WAKNIN:** Okay. Let's break for lunch now.
22 Let's do an hour again. Okay. Can we go off the record?

23 **THE REPORTER:** And with that, we are off the
24 record. The time is 12:24 p.m.

25 **(WHEREUPON, a recess was taken.)**

1 **THE REPORTER:** We are going back on the record.

2 We are back on the record. The time is 1:31 p.m.

3 **BY MS. WAKNIN:**

4 **Q.** Mr. Grose, did you speak with anyone that was not
5 your lawyer during the break?

6 **A.** Other than ordering my sandwich, no.

7 **Q.** For every map under Commissioner Graves's name did
8 you draw that map?

9 **MS. GOLDMAN:** Objection as to form. Vague.

10 **BY MS. WAKNIN:**

11 **Q.** You can answer.

12 **A.** Can you explain what you mean by every map under
13 Commissioner Graves's name?

14 **Q.** So for maps that were associated with Commissioner
15 Graves, ones that he publicly produced or internally
16 circulated for example, were you the map -- main map drawer
17 for him?

18 **A.** Unless he had maps that I did not know about, yes.

19 **Q.** So you drew every map for him?

20 **MS. GOLDMAN:** Objection.

21 **THE WITNESS:** Unless he produced maps that I was
22 unaware of, I believe that's correct.

23 **BY MS. WAKNIN:**

24 **Q.** And no one else drew maps for Commissioner Graves.

25 **MS. GOLDMAN:** Objection. Asked and answered,

1 calls for speculation.

2 **THE WITNESS:** Not that I'm aware of.

3 **BY MS. WAKNIN:**

4 **Q.** I'm going to introduce as Exhibit 1 the 2021
5 Redistrict Commissioner Graves legislative district
6 Proposal. And I'll also put it up on the screen so you can
7 see it. I'm so sorry.

8 (Whereupon, Exhibit 1 was marked for
9 identification.)

10 **MS. GOLDMAN:** If you give them both to me I can
11 pass them --

12 **MS. WAKNIN:** Okay. Thank you. Yeah. You're just
13 so far away.

14 **MR. HUGHES:** I'm just, you know, trying to make
15 things interesting.

16 **BY MS. WAKNIN:**

17 **Q.** Okay. You can take a second to look over that.

18 **A.** Okay.

19 **Q.** Have you had a second to look over this?

20 **A.** Just one second.

21 **Q.** Okay.

22 **MR. STOKESBARY:** This is Drew Stokesbary, counsel
23 for interveners. Are we able to upload PDFs and other
24 exhibits to the Zoom chat like yesterday?

25 **MS. WAKNIN:** Sure. I can figure out how to do

1 that after this. I'll do it on a break. Can you see it on
2 the screenshare?

3 **MR. STOKESBARY:** I can see it on the timeshare.
4 That's quite helpful. Screenshare. I don't know why I said
5 timeshare. I've got vacation on my mind.

6 **MS. WAKNIN:** I don't know how to do that right
7 now, so we can figure that out on the break.

8 **THE WITNESS:** Proceed.

9 **BY MS. WAKNIN:**

10 **Q. Well, thank you. Do you recognize this map?**

11 **A. I do.**

12 **Q. What is it?**

13 **A. This would have been -- from the best of my memory**
14 **-- the legislative proposal, or draft map, I should say,**
15 **that we released as part of the four caucuses release in**
16 **draft maps.**

17 **THE REPORTER:** What caucuses?

18 **THE WITNESS:** The House Republican Caucus, the
19 House Democratic Caucus, Senate Republican Caucus, Senate
20 Democratic Caucus.

21 **BY MS. WAKNIN:**

22 **Q. Did you draw this map?**

23 **A. Yes.**

24 **Q. Did anyone help draw -- help with you drawing this**
25 **map?**

1 A. It's drawn on behalf of Commissioner Graves, so
2 with his direction. Again, technical drawing of the map is
3 different than deciding precisely what geographies go where.

4 **Q. When Commissioner Graves was deciding what**
5 **geographies went where how would he transmit that**
6 **information to you?**

7 A. It could come in different forms. Sometimes they
8 were very specific areas chosen. Typically it had gone
9 through, you know, different iterations of some things. So
10 some things he liked, didn't like. It could have been
11 probably a number of factors on an analytical basis that
12 could have played a role in that. Communities of interest
13 that he was concerned about.

14 Like I said, it was typically a -- sometimes a
15 trial and error process, sometimes there were very specific
16 things that we were looking for. Or, excuse me, that he was
17 looking for. It just kind of depends on the situation.

18 **Q. So were you drawing the map and picking the**
19 **boundaries or was Commissioner Graves, while you were**
20 **drawing the map, telling you, you know, "I want this line**
21 **here or that line there"?**

22 **MR. HUGHES:** Object to form.

23 **MS. GOLDMAN:** Yeah. Object to form.

24 **BY MS. WAKNIN:**

25 **Q. You can answer.**

1 A. He would have a pretty good idea of what he wanted
2 and -- in most cases. In other cases, you know, I -- he had
3 asked me to -- let's see what we can do in this area or that
4 area.

5 And he would like some of those -- not many of
6 them. Threw almost all of them out obviously. And then
7 found some configurations that he thought were appropriate
8 and then we kind of explored those and did some smaller
9 edits to those kind of districts. Just kind of a trial and
10 error process in most cases.

11 **Q. And did he tell you the boundaries that he wanted**
12 **for legislative district 15?**

13 A. Those were always evolving because we knew that
14 that was going to become a pretty important district to all
15 sides. You know, largely in areas of, I'd say, Seattle for
16 instance.

17 We didn't feel that A, we didn't have any members
18 representing that; and B, you know, those weren't districts
19 politically that we were usually most concerned with. So we
20 somewhat ceded a lot of the decision-making to those who had
21 more local knowledge, who had more constituents in those
22 areas.

23 Excuse me. I forgot where I was going with this.
24 Similar to most of the parts of the east side. Those were
25 areas where our Democratic colleagues didn't have much

1 interest of the most part.

2 But we knew this was one area where we both had --
3 we both had concerns -- I don't want to say concerns over.
4 It's probably not the right word. We were both interested
5 in. So can you go back to the original question?

6 **Q. Well, why were you interested -- why was**
7 **Commissioner Graves interested in the legislative district**
8 **15?**

9 A. Well, I can't speak for Commissioner Graves. But
10 we took interest in everything that we knew our counterparts
11 were going to take interest in. That was the only way we
12 were going to get to an agreed-upon map.

13 **Q. So was legislative district 15 interesting because**
14 **it was a negotiation point?**

15 A. That's right. We knew it would be a heavily-
16 negotiated district.

17 **Q. Right. And why was that?**

18 A. There had been lots of community input on that
19 specific area of the state. We knew that there were some
20 configurations -- off the top of my head -- again, I can
21 only speak for myself -- that the -- I believe it was the
22 House Democratic Caucus released with some pretty, I'd say,
23 districts that very little resembled any of the guidance
24 that were given via statute for drawing districts.

25 So we wanted to come up with the best solution

1 possible to that. We knew in releasing this map that this
2 certainly was never going to be the final map, but we did
3 our best to try to incorporate all of the things that we
4 wanted to see on a map. Or, excuse me, all the things
5 Commissioner Graves wanted to see on a map.

6 **Q. So what were the things that Commissioner Graves**
7 **wanted to see on this specific map?**

8 A. I think the best way to -- I know he released a
9 statement with this. That would -- I can speculate, but
10 that's probably the best thing to reference is the statement
11 released with this map.

12 **Q. Well, I'm asking you. So what did he tell you**
13 **while you were drawing this map were his stated goals or**
14 **ideas for this map?**

15 A. Just this section of the map or the map?

16 **Q. For legislative district 15.**

17 A. legislative district 15. Right. One thing that
18 was always very -- two real things that we were always very
19 conscientious of -- one was preserving the Yakima tribe and
20 ensuring that they were in their own legislative district.

21 As you can see, that line between 14 and 15 should
22 exactly mirror that of the line of the tribal district. So
23 I think it's Highway 82 off the top of my head. I can't
24 recall. But the highway there is pretty close to the line
25 there of Yakima Indian Reservation.

1 And the other things that we were considering here
2 obviously was the Hispanic population in the district, the
3 majority-minority nature of the -- some parts of the area.
4 And then obviously, as you can see, we tried to neatly fit
5 it in within the Benton County lines right there as well.

6 **Q. Did you draw a majority-minority Hispanic voting-**
7 **age population district in this map?**

8 A. I don't believe you have voting-age population or
9 citizens voting-age population on this chart here.

10 **Q. Well, this came from the Redistricting**
11 **Commission's website, so -- but I'm asking you while you**
12 **were drawing maps you decided -- you talked about looking at**
13 **that, voting-age population --**

14 A. Yeah.

15 **Q. In this map with the Hispanic population was**
16 **legislative district 15 a majority Hispanic map district?**

17 A. Without seeing the numbers I couldn't say. Yeah.
18 I believe that was the intent of drawing this district. But
19 again, I'd have to go back and look at records, additional
20 information about this map.

21 **Q. Did you draw Hispanic CVAP district for**
22 **legislative 15 or 14 in this map?**

23 **MS. GOLDMAN:** Objection as to form. Vague.

24 **THE WITNESS:** Again, I'd have to see the data on
25 that. I believe this one was said to not have been a CVAP

1 district. Again, as I recall I believe this was a VAP
2 majority-minority district. But again, I need to see the
3 specific numbers on that.

4 **BY MS. WAKNIN:**

5 **Q. Okay. When Commissioner Graves talked about**
6 **majority-minority goals for this map did he express the**
7 **racial goals for the district?**

8 A. We were conscientious that our counterparts were
9 A, interested in that; B, it became more plausible to draw a
10 majority-minority district in that area of the world. So
11 that was certainly something that we were interested in. I
12 don't know if that answers your question or not.

13 **Q. Why did it become more plausible that you could**
14 **draw a Hispanic majority-minority district in that map -- in**
15 **that side of the state?**

16 A. There became an increase in Latino populations as
17 opposed to non-Latino populations.

18 **Q. How do you know that?**

19 A. The census data was pretty indicative of that.

20 **Q. And so what was the purpose of this map?**

21 A. This was our proposal, the House Republican Caucus
22 proposal -- or proposed map, excuse me. Looking back on it,
23 I'm not sure that proposed maps serve much of a purpose
24 other than to garner interest in the process, candidly.

25 I think all four commissioners were -- I can

1 speculate -- would be aware that the nature of the structure
2 of our Commission ultimately was going to lead to, you know,
3 a much more slightly nuanced version of the current map or
4 there would be smaller changes were needed. Some cases,
5 much bigger changes.

6 I think the final product definitely was -- would
7 demonstrate that. But that this was more like -- partisan
8 wish lists may be a way of putting it, although that's
9 probably not the correct way of analyzing that.

10 **Q. What do you mean by partisan wish list?**

11 A. In terms of if you look at this map on a totality
12 partisan basis, if you looked at the Democratic maps on a
13 partisan totality basis, you're probably going to see those
14 maps skewing toward the caucuses that drew them.

15 **Q. Okay. And so did this map in the 14th and 15th**
16 **legislative districts skew towards the Republican caucus**
17 **since you drew them?**

18 A. I couldn't say on partisan performance what this
19 14 or 15 would do without looking at the numbers. My gut
20 would tell me that the 15th actually may have been more
21 Democratic in this version. But again, without the numbers
22 I can't say for certain.

23 **Q. When you're talking about majority-minority**
24 **districts with respect to when this map was proposed in**
25 **September of 2021, was your understanding of the term**

1 **majority-minority district to be majority-minority VAP or**
2 **CVAP?**

3 A. Again, I can't say at what time. We talked about
4 this earlier. I can't say specifically what time that
5 conversation changed. I would believe that that
6 conversation would likely happened -- or those evolving
7 conversations around judging by VAP or CVAP would have
8 happened after this. But again, I can't say specifically
9 when that conversation evolved.

10 **Q. Did you provide Commissioner Graves with the**
11 **electoral performance of this map?**

12 A. Yes. I would have.

13 **Q. And did Commissioner Graves look at the electoral**
14 **performance that you provided him on this map?**

15 A. I can't say for sure what he did or did not do
16 with things I provided him. I would assume so.

17 **Q. Did you have conversations about the electoral**
18 **performance of this map?**

19 **MS. GOLDMAN:** With Commissioner Graves.

20 **BY MS. WAKNIN:**

21 **Q. With Commissioner Graves.**

22 A. I'm assuming we probably did.

23 **Q. Did you have conversations with anyone else about**
24 **the electoral performance of this map?**

25 A. Paul Campos I'm sure I likely did. Other than

1 that -- I don't think so other than that.

2 **Q. When did you have conversations with Paul Graves**
3 **about the electoral performance of this map?**

4 A. You asked when?

5 **Q. When.**

6 A. When? Again, I can't say for certain when a
7 specific conversation happened. I'm assuming it likely
8 would have been around the release time of this map or prior
9 in prior drafts.

10 **Q. What were those meetings like when you were**
11 **talking about electoral performance with Commissioner**
12 **Graves?**

13 **MS. GOLDMAN:** Objection as to form. Vague.

14 **THE WITNESS:** Is this in regards to this map?

15 **BY MS. WAKNIN:**

16 **Q. Generally when you had conversations about**
17 **electoral performance on maps.**

18 **MS. GOLDMAN:** Objection as to form.

19 **THE WITNESS:** It somewhat depends on what stage we
20 were at in the process. Early on with no census data we
21 went through different exercises just seeing how skewed a
22 map could be, both Republicans and Democrats. Things that
23 -- small shifts in boundaries that could lead to those big
24 changes.

25 Those were more just mapping exercises in general,

1 which actually turned out to be very helpful just for
2 general mapping skills. In terms of that though, nearing
3 the actual point of negotiations it was much more around
4 totality of the map not being overly skewed one way or
5 another.

6 **BY MS. WAKNIN:**

7 **Q. When you looked at electoral performance did you**
8 **look at electoral performance with breakdowns by race?**

9 **A.** We looked at all breakdowns. So both politically,
10 racially, the other available data that you have. We tried
11 to holistically look at each district.

12 **Q. And that's for electoral performance?**

13 **MS. GOLDMAN:** Objection as to form.

14 **THE WITNESS:** We took a look at all the available
15 data we could for each district.

16 **MS. WAKNIN:** Okay.

17 **THE WITNESS:** Yeah.

18 **BY MS. WAKNIN:**

19 **Q. So when you -- I want to get specific about**
20 **electoral performance. When you looked at the way that a**
21 **district would perform would you look at electoral**
22 **performance based off of partisanship? Rs versus Ds.**

23 **A.** Typically we would look at historical performance;
24 yeah.

25 **Q. Would you look at electoral performance of Latinos**

1 **versus non-Latinos?**

2 **MR. STOKESBARY:** Objection to form. Vague.

3 **BY MS. WAKNIN:**

4 **Q.** You can answer.

5 **A.** Typically holistic performance of a district.

6 **Q.** Is that a yes or a no?

7 **MS. GOLDMAN:** Objection. Asked and answered.

8 **THE WITNESS:** We looked at the holistic
9 performance of the district based on Republicans or
10 Democrats.

11 **BY MS. WAKNIN:**

12 **Q.** And what does "holistically" include?

13 **A.** Within district boundaries.

14 **Q.** Did you do a polarized voting analysis on this
15 map?

16 **A.** Not that I'm aware of.

17 **Q.** Could you have done a polarized voting analysis on
18 this map?

19 **A.** I could not have done that; no.

20 **Q.** Could Commissioner Graves have done or have --
21 strike that. Could Commissioner Graves have hired someone
22 to do a polarized voting performance or analysis on this
23 map?

24 **MR. STOKESBARY:** Objection. Form. Calls for
25 speculation.

1 **MS. GOLDMAN:** Objection. Calls for speculation.

2 **MR. HUGHES:** And lack of foundation.

3 **THE WITNESS:** Candidly, I don't know. Maybe.

4 **BY MS. WAKNIN:**

5 **Q.** Did you ask Commissioner Graves to hire someone to
6 do a polarized voting analysis on this map?

7 **A.** I did not. No.

8 **Q.** Why?

9 **A.** For a draft map that had not -- that was not going
10 to be the ultimate map passed? That had not occurred to me.

11 **Q.** Did you ever have anyone perform polarized voting
12 analysis on any of the maps that you've drawn?

13 **A.** No.

14 **Q.** Why is that?

15 **A.** None of the maps that we had drawn as drafts were
16 ultimately going to be adopted into the final map. If we
17 were at that point -- again, not my decision to make at that
18 point.

19 To me it would not have made sense at the time to
20 have done that. But that is my opinion. I can't say why
21 there was not a racial analysis done or not -- if it was or
22 was not done. I am unaware. I don't know.

23 **Q.** So I want to go back. I'm talking about polarized
24 voting in general. So do you understand that? How do you
25 understand that term?

1 A. When minority population would vote significantly
2 different than the rest of the population in a certain area.

3 Q. And would it ever have made sense for you to do a
4 polarized voting analysis of Latinos versus non-Latino
5 voting patterns in the Yakima region?

6 MS. GOLDMAN: Objection as to form, foundation,
7 relevance.

8 THE WITNESS: Can you repeat the question?

9 BY MS. WAKNIN:

10 Q. Would it have ever made sense to you to do a
11 polarized voting analysis of Latino voting patterns versus
12 non-Latino voting patterns in the Yakima region?

13 MS. GOLDMAN: And Counsel, to be clear, you're
14 just asking him for his opinion?

15 MS. WAKNIN: Can you lodge a formal objection?

16 MS. GOLDMAN: Objection as it's vague and
17 ambiguous.

18 BY MS. WAKNIN:

19 Q. You can answer if you understand.

20 A. In my opinion it didn't seem necessary for draft
21 maps. Obviously for the final maps produced there may be
22 some utility to that. But that's my opinion.

23 Q. Did Commissioner Graves ever express needing to do
24 a polarized voting analysis on any of the draft maps?

25 A. Not that I can recall.

1 **MR. STOKESBARY:** Objection as to form. Calls for
2 speculation.

3 **BY MS. WAKNIN:**

4 **Q.** Did any of the commissioners to your knowledge
5 discuss conducting a polarized voting analysis of Latino
6 versus non-Latino voting patterns?

7 **A.** I'm not sure. There may have been comments made
8 by Commissioner Walkinshaw to that effect, but I couldn't
9 specifically remember.

10 **Q.** Did any of the Commission staff -- the official
11 Commission staff -- interview anyone to conduct a polarized
12 voting analysis on Latino versus non-Latino voting patterns
13 in Washington?

14 **MS. GOLDMAN:** Objection. Calls for speculation.
15 Lack of foundation.

16 **THE WITNESS:** Hire someone? Not that I'm aware
17 of. Hiring? I don't know. Certainly the UCLA Voting
18 Rights Project -- I don't know if that's the correct name or
19 not -- they were certainly involved. I don't know if they
20 were hired, if there was a relationship. I can't say for
21 certain.

22 **BY MS. WAKNIN:**

23 **Q.** What do you remember about Commissioner
24 Walkinshaw's comments about polarized voting analysis?

25 **A.** I know he made comments to that effect. I cannot

1 remember what those specific comments were.

2 **Q. And how did Commissioner Graves react to those**
3 **comments?**

4 **MS. GOLDMAN:** Objection. Calls for speculation.
5 Lack of foundation.

6 **THE WITNESS:** I think, again, this is my opinion
7 on what I think his reaction likely was. We knew it was
8 going to be an important region in the final map and we were
9 going to have to in some ways find a way to come to an
10 agreement on what the whole thing was going to look like.

11 **BY MS. WAKNIN:**

12 **Q. What do you mean come to -- strike that. Was this**
13 **the only proposed -- publicly-proposed map by Commissioner**
14 **Graves? The map that you're looking at right now.**

15 **A.** As far as I'm aware, yes.

16 **Q. Okay. Did Commissioner Graves conduct any**
17 **polarized -- strike that. Were there other maps that were**
18 **publicly -- that were not publicly sponsored by Commissioner**
19 **Graves that you drew?**

20 **MR. HUGHES:** Object to form.

21 **MS. GOLDMAN:** Objection. Asked and answered.

22 **THE WITNESS:** Can you repeat the question one more
23 time?

24 **BY MS. WAKNIN:**

25 **Q. Strike the last question. Can you list for me the**

1 map -- the other maps that you had drawn for Commissioner
2 Graves that were not publicly sponsored?

3 MR. HUGHES: Object to form.

4 THE WITNESS: I drew lots of draft maps. Like, I
5 couldn't name any one specifically. Most of them are
6 equivalent to taking chicken scratch notes, candidly. Like,
7 I couldn't name any specific ones; no.

8 BY MS. WAKNIN:

9 Q. Okay. I'm going to stop the screenshare on
10 Exhibit 1. So after this map comes out what were the
11 negotiations or discussions like between Commissioner Graves
12 and other commissioners?

13 MS. GOLDMAN: Objection. Calls for speculation.
14 Lack of foundation. I'm sorry. Go ahead.

15 MR. HUGHES: And vague.

16 MR. STOKESBARY: I agree with those objections.

17 BY MS. WAKNIN:

18 Q. You can answer.

19 A. It felt like a pretty fast process from the
20 release of these maps to starting the negotiations process.
21 That didn't really seem to come to a head in terms of, I'd
22 say, real gritty, kind of getting-to-the-point negotiations
23 up until much closer to the deadline. Yeah.

24 Q. Did any community groups from the Yakima area
25 contact Commissioner Graves regarding the September 21st

1 map?

2 MS. GOLDMAN: Objection. Calls for speculation,
3 lack of --

4 THE WITNESS: I couldn't --

5 MS. GOLDMAN: -- foundation.

6 BY MS. WAKNIN:

7 Q. You can answer.

8 A. Sorry. I couldn't see Commissioner Graves's
9 communications so I am unaware. I don't know.

10 Q. Did you schedule any meetings for Commissioner
11 Graves with any community groups from the Yakima area after
12 the September 21st map was released?

13 A. If I did I do not recall.

14 Q. What was the -- can you explain to me the public
15 feedback that you got from folks from the Yakima region
16 about the legislative districts 14 and 15 from the
17 commissioner -- from Commissioner Graves's map?

18 MS. GOLDMAN: Objection as to form. Vague.

19 THE WITNESS: For the most part I cannot recall
20 specifically on this region in terms of feedback that we got
21 from the public. Candidly, I cannot remember. We received
22 lots of feedback on the map in lots of areas.

23 BY MS. WAKNIN:

24 Q. Did it come to your attention that the September
25 21st map didn't include a majority Hispanic VAP district?

1 A. Say that one more time, please.

2 Q. Did it ever come to your attention that the
3 September 21st Commissioner Graves map did not include a
4 majority Hispanic VAP district?

5 A. Doing my best to recall what we thought at that
6 point in time. I believe this was a majority-minority VAP
7 district. I can't say for certain that it was a majority
8 Hispanic VAP district.

9 Again, I'd have to go back and review the
10 available data on this map. But I believe that's where our
11 thinking was at the time. Or let me correct that. That was
12 the impression that we were under.

13 Q. Okay. Why were you under the impression that you
14 were -- that this was a majority Latino VAP district?

15 MS. GOLDMAN: Objection. Misstates the testimony.

16 THE WITNESS: I cannot attest to the numbers that
17 I can't see here.

18 MS. WAKNIN: Okay.

19 THE WITNESS: That might be -- that might make
20 this easier for me to analyze this.

21 BY MS. WAKNIN:

22 Q. Can you explain to me what the top eight
23 performance metrics were?

24 A. I cannot remember what specific races were
25 involved. But I believe it was the -- some aggregate of

1 most statewide races in 2020. I believe presidential
2 numbers. Again, I can't remember the precise inputs. I'd
3 have to go back and look.

4 **Q. Who came up with that top eight ranking list?**

5 A. I can't say for certain. I think we were looking
6 -- as we had been for some time before -- the four
7 commissioners had agreed to use the treasurer metric. I
8 think we'd been looking for some time to find a metric that
9 we -- that all four quarters could kind of agree upon to use
10 as a kind of a baseline.

11 I think that was one of the proposals was kind of
12 aggregating the results from multiple different races in
13 theory to get a more baseline number, the most accurate
14 number, right, so it kind of takes other political elements
15 out of it. I think that was one of the proposals. I can't
16 say for sure how it came about.

17 **Q. Okay. Was there any other way that you would rank**
18 **districts for maps?**

19 **MS. GOLDMAN:** Objection as to form. Vague.

20 **BY MS. WAKNIN:**

21 **Q. You can answer.**

22 A. Can you describe what you mean by rank?

23 **Q. Well, you have a top eight district ranking;**
24 **right? So were there any other ways --**

25 **MR. STOKESBARY:** Objection --

1 **BY MS. WAKNIN:**

2 **Q. -- that you would rank districts?**

3 **MR. STOKESBARY:** -- misstates the evidence.

4 Misstates the testimony.

5 **MS. GOLDMAN:** Objection. Misstates the evidence
6 and the testimony as well.

7 **BY MS. WAKNIN:**

8 **Q. How would you describe the top eight breakdown**
9 **then?**

10 **MS. GOLDMAN:** Objection. Asked and answered.

11 **THE WITNESS:** Right. That's a way to measure
12 political performance.

13 **BY MS. WAKNIN:**

14 **Q. All right. Can you explain to me what happened**
15 **between September 21st -- the first public map -- and then**
16 **October -- I believe it's 25th when Commissioners Walkinshaw**
17 **and Simms released second versions of their maps?**

18 **MR. STOKESBARY:** Objection as to form. Vague.

19 **THE WITNESS:** Describing that period? We were
20 getting prepared for negotiations, getting more time to work
21 with the census data, which at that point had still somewhat
22 recently come in at that time. It's a very fast-moving
23 process, so I -- lots going on in that period. If you had
24 something more specific maybe I can answer that.

25 **BY MS. WAKNIN:**

1 Q. Well, were you drawing maps -- additional maps --
2 for Commissioner Graves during that period from September
3 21st to October 25th?

4 A. I would imagine so. Again, without looking back
5 at my schedule it would be hard to say. But I would imagine
6 so.

7 Q. Okay. What did these maps look like?

8 A. Are you asking about maps produced after -- or
9 during this period?

10 Q. Yes. During the October -- during September 21st
11 to October 25, 2021, when you were drawing additional maps
12 did Commissioner Graves provide you with any feedback on the
13 September 21st map to work off of for new maps that you
14 drew?

15 A. And by September 21st map you mean this map in
16 front of us here?

17 Q. Correct.

18 A. Looking back at that period, again, I have to look
19 at my work during that period. I would imagine that we were
20 almost certainly at that point trying to find kind of first
21 steps into consensus building.

22 So finding ways that we can incorporate elements
23 of other released maps where we thought it was appropriate,
24 trying to find a more consensus-building type map that they
25 could ultimately vote on. Early stages, but I would

1 imagine, looking back, that's probably what I would have
2 been doing during that period.

3 **Q. Did you make any changes to the 14th and 15th**
4 **legislative districts during that time when you were drawing**
5 **maps?**

6 **MR. STOKESBARY:** Objection as to form. Vague.

7 **MS. GOLDMAN:** I join the objection.

8 **THE WITNESS:** Probably. Again, cannot say for
9 certain.

10 **BY MS. WAKNIN:**

11 **Q. Did you receive any presentations on voting rights**
12 **compliance between September 21st to October 25, 2021?**

13 A. I had seen -- I can't say specifically what time
14 period it was, but I had seen the UCLA Voting Rights Project
15 presentation at that point. I believe it would have been
16 that point in time. I can't say, again, exactly when. But
17 it seems like it would have been right around that time.

18 **Q. Who gave you that presentation?**

19 **MR. HUGHES:** Objection. Vague.

20 **BY MS. WAKNIN:**

21 **Q. You can answer.**

22 A. I can't say exactly who would have sent it to me.
23 But I did see it. Yeah.

24 **Q. What did that presentation say?**

25 A. It was a polarized voting analysis in part. It

1 was in part analyzing the proposed maps. To the best of my
2 memory it also proposed different forms of the 15th or 14th
3 district. There may have been more to it, but I do recall
4 that.

5 **Q. Did Commissioner Graves receive this report?**

6 A. I believe he did.

7 **MR. STOKESBARY:** Objection. Calls for
8 speculation.

9 **THE WITNESS:** I don't know for sure.

10 **BY MS. WAKNIN:**

11 **Q. Did you ever share with him this report?**

12 A. I may have.

13 **Q. What was Commissioner Graves's opinion about this**
14 **report?**

15 **MS. GOLDMAN:** Objection. Calls for speculation,
16 lack of foundation.

17 **MR. STOKESBARY:** Join the objection.

18 **THE WITNESS:** Yeah. Cannot recall at the time.

19 **BY MS. WAKNIN:**

20 **Q. Did he express any opinion to you about this**
21 **report?**

22 A. I'm certain we talked about it. I cannot recall
23 specifically how those conversations went though.

24 **Q. What did you think about the report?**

25 **MS. GOLDMAN:** Objection as to form. Vague.

1 Relevance.

2 **THE WITNESS:** Personally, I felt that these were
3 -- the proposals given as alternatives in this map reflected
4 someone drawing a map that is not from Washington state nor
5 understands the communities in that area.

6 **BY MS. WAKNIN:**

7 **Q.** Do you have any opinions about the polarized
8 voting analysis in the report? In the Barreto report.

9 **MS. GOLDMAN:** Objection as to form. Vague.
10 Relevance.

11 **THE WITNESS:** Any opinions about the --

12 **MS. WAKNIN:** Yep.

13 **THE WITNESS:** -- racial -- no. No opinions. It's
14 an analysis of sorts I guess.

15 **BY MS. WAKNIN:**

16 **Q.** Do you think that the findings in that polarized
17 voting analysis were important?

18 **MS. GOLDMAN:** Objection as to form. Vague.

19 **THE WITNESS:** I do think there's a certain
20 importance to that type of analysis; yes.

21 **BY MS. WAKNIN:**

22 **Q.** What did you understand about the analysis in that
23 specific report?

24 **MS. GOLDMAN:** Objection as to form. Vague.

25 **THE WITNESS:** That Democrats in the Yakima Valley

1 area have voted for Democrats more often than Republicans.

2 **BY MS. WAKNIN:**

3 **Q. Was the polarized voting report about Democrats**
4 **versus Republicans? Is that your understanding?**

5 **A.** It's been a long time since I looked at it, so I'd
6 have to go back and look at it to refresh myself.

7 **Q. Okay. So did you -- I just want to clarify. Did**
8 **you say that Democrats vote more often for Democrats than**
9 **Republicans? Was that your understanding from the report?**

10 **A.** Excuse me. Let me clarify. I guess I misstated.
11 That Hispanics in more Hispanic precincts, I suppose, vote
12 more frequently for Democrats than Republicans.

13 **Q. Okay. So do you associate Latinos with Democrats?**

14 **MS. GOLDMAN:** I'm sorry. I did not understand
15 what you said.

16 **BY MS. WAKNIN:**

17 **Q. Do you associate -- apology. Do you associate**
18 **Latinos or Hispanics with Democrats?**

19 **MS. GOLDMAN:** Objection as to form. Vague.

20 **THE WITNESS:** No; not at all.

21 **BY MS. WAKNIN:**

22 **Q. And so after you saw that report did you share it**
23 **with anyone? Did you share it with anyone?**

24 **A.** I feel confident that I likely had conversations
25 with Paul Campos about it. Outside of that and/or

1 Commissioner Graves I don't see why I would have.

2 **Q. Do you have any reason to dispute the findings in**
3 **the report?**

4 **MS. GOLDMAN:** Objection as to form. Vague,
5 relevance, foundation, calls for speculation.

6 **BY MS. WAKNIN:**

7 **Q. You can answer.**

8 A. I would have reason to believe that the proposed
9 districts -- the alternatives proposed there violated a
10 number of redistricting principles and broke up other
11 communities of interest, including the Yakima nation. So I
12 would dispute that those would be proper alternatives to
13 what the final map might show.

14 **Q. So I want to talk about the polarized voting**
15 **analysis specifically in that report. Do you have any**
16 **reason to dispute the findings that Latinos vote more often**
17 **for Democrats than Republicans?**

18 **MR. STOKESBARY:** Objection as to form. Lack of
19 foundation.

20 **BY MS. WAKNIN:**

21 **Q. You can answer.**

22 **MS. GOLDMAN:** Objection. Calls for speculation.

23 **THE WITNESS:** Without refamiliarizing myself with
24 the report it'd be tough to say. I'd have to look at the
25 report again.

1 BY MS. WAKNIN:

2 Q. So you said that the demonstrative maps that you
3 saw in that report didn't reflect the knowledge of someone
4 from Washington state; is that correct?

5 A. It would have appeared to me that way from the
6 knowledge that we have of those individual communities,
7 people that have represented them, do represent them,
8 community members in the area. It did not seem that that
9 was representative of -- there were better alternatives to
10 those proposed districts.

11 Q. What are the better alternatives that you're
12 speaking of?

13 A. That there were ways to create majority-minority
14 -- excuse me, majority Hispanic -- excuse me -- districts
15 that were not nearly as scattered across the map, more
16 contiguous, more compact, not splitting up as many counties
17 as it did nor municipalities. I can't envision the
18 alternatives right off the top of my head, but that's my
19 recollection of those alternatives.

20 Q. Yeah. So, like, for example, if you're saying
21 splitting communities, you wouldn't want to take people
22 from, like, Adams County, right, and put them with someone
23 from, like, Yakima City. Is that what you're thinking of?

24 MR. HUGHES: Objection. Incomplete hypothetical.

25 MS. GOLDMAN: Join. Calls for speculation.

1 **THE WITNESS:** Can you say that one more time?

2 **BY MS. WAKNIN:**

3 **Q.** Would you take -- when you're saying that there
4 are communities that are split across or far from each
5 other, how would you measure that distance?

6 **MS. GOLDMAN:** Objection as to form. Vague. What
7 distance?

8 **THE WITNESS:** Again, I think we take a look at a
9 lot of the different factors that play a role here. Look at
10 splitting up different counties -- countries have different
11 issues, different identities.

12 Municipalities have unique issues, unique
13 identifies. Certainly Seattle and Tacoma are two very
14 different cities. Some have similar problems. Some have
15 much different problems. Much the same way with, I would
16 say, Pasco and Othello and Yakima, maybe Toppenish; right?
17 These are all individual areas that have unique problems.

18 Then again, some neighboring cities, say Edgewood
19 and Milton, have much more -- they share boundaries; right?
20 They're much more similar. They're cohesive. Much more so
21 than some of the communities that ultimately ended up in the
22 15th district.

23 **BY MS. WAKNIN:**

24 **Q.** So is the city of Othello not, I guess, close to
25 the city of Yakima then?

1 **MS. GOLDMAN:** Objection. Are you saying
2 geographically close?

3 **MS. WAKNIN:** Geographically close.

4 **THE WITNESS:** Well, close is somewhat dependent on
5 the context. But I would say generally speaking, especially
6 compared to the previous 15th district, no.

7 **BY MS. WAKNIN:**

8 **Q. What is your understanding of maintaining counties**
9 **whole in relation to compliance with the Federal Voting**
10 **Rights Act?**

11 **MS. GOLDMAN:** Objection. Calls for a legal
12 conclusion.

13 **THE WITNESS:** That is a guidance from State
14 statute.

15 **BY MS. WAKNIN:**

16 **Q. So I'm asking about the Federal Voting Rights Act.**
17 **Do you know if there's -- do you have any knowledge that the**
18 **Federal Voting Rights Act require the maintaining of**
19 **counties to be whole?**

20 **MS. GOLDMAN:** Objection. Calls for a legal
21 conclusion.

22 **THE WITNESS:** Not that I'm aware of in the Voting
23 Rights Act. But I haven't reviewed the Voting Rights Act in
24 a while, so --

25 **BY MS. WAKNIN:**

1 **Q. When did you review the Voting Rights Act?**

2 A. I had reviewed the Voting Rights Act throughout
3 learning more about some of the requirements, things that we
4 are supposed to abide by in drafting maps. Just as
5 additional guidance on things that we need to consider in
6 any given situation. I couldn't say exactly when.

7 **Q. What is your understanding of maintaining cities**
8 **whole in relation to compliance with the Federal Voting**
9 **Rights Act?**

10 **MS. GOLDMAN:** Objection. Calls for a legal
11 conclusion.

12 **THE WITNESS:** So it'd be my -- same answer as the
13 last question. I'm not sure that it's contained in the
14 Voting Rights Act.

15 **BY MS. WAKNIN:**

16 **Q. Did Commissioner Graves express any understanding**
17 **of the Federal Voting Rights Act to you?**

18 A. I was under the impression he had a decently-
19 formed understanding of it, but I can't speak to that.
20 That's a question for him.

21 **Q. When you were drawing maps for Commissioner Graves**
22 **did he mention compliance with the Voting Rights Act?**

23 A. We had discussed that. I can't say specifically
24 when. And it seems like one of those things that likely
25 came up many times. Exactly what was compliant and not

1 compliant -- excuse me.

2 What was compliant and not compliant is probably
3 clearly not something I could make a judgment on. Excuse
4 me. I lost my train of thought there. Not something that I
5 could make a judgment on. But he ultimately has to make the
6 decisions here, so that decision lies with him.

7 **Q. Was there anyone hired to provide you with**
8 **guidance after you'd drawn a map on whether or not the map**
9 **was compliant with the Voting Rights Act?**

10 A. Not that I'm aware of.

11 **Q. Did Commissioner Graves hire anyone to look at**
12 **completed maps that you'd drawn for compliance with the**
13 **Voting Rights Act?**

14 **MS. GOLDMAN:** Objection. Calls for speculation.
15 Lack of foundation.

16 **THE WITNESS:** Not that I'm aware of. I don't
17 know.

18 **BY MS. WAKNIN:**

19 **Q. Did the Republican caucus hire anyone to view and**
20 **assess the compliance with the Voting Rights Act after maps**
21 **had been drawn?**

22 **MS. GOLDMAN:** Objection. Calls for speculation.
23 Lack of foundation.

24 **THE WITNESS:** Not that I can recall.

25 **BY MS. WAKNIN:**

1 Q. Did the Commission hire anyone to review maps
2 after they were drawn to see if the maps complied with the
3 Federal Voting Rights Act?

4 MS. GOLDMAN: Objection. Calls for speculation.

5 THE WITNESS: Yeah. I'm not sure. I don't know.

6 BY MS. WAKNIN:

7 Q. Did you ever ask if there was someone hired to
8 assess whether or not maps were compliant with the Federal
9 Voting Rights Act?

10 A. Can you say that one more time? Sorry.

11 Q. Did you ever ask if there was anyone hired to
12 assess whether or not maps that you'd drawn were compliant
13 with the Federal Voting Rights Act?

14 A. I don't know. I don't recall.

15 Q. Did you ever ask for someone to look at the map
16 that you had drawn to ensure that it complied with the
17 Federal Voting Rights Act?

18 A. Not that I'm aware of.

19 Q. Why didn't you ask if your map was compliant with
20 the Federal Voting Rights Act?

21 A. As I stated before, I'm very aware upon release of
22 draft maps that they certainly were not going to be the
23 final maps. We certainly knew that, you know, those would
24 have been later down the road and that these sorts of
25 discussions were going to be more important as we got to a

1 consensus version of the map. So again, this is me
2 suspecting how things work here, that that was going to be
3 something that would likely would have happened down the
4 road after proposals came out.

5 **Q. To your knowledge did anyone review the draft maps**
6 **later down the road for compliance with the Voting Rights**
7 **Act?**

8 **MS. GOLDMAN:** I'm going to instruct you on the
9 basis of the attorney-client privilege that you are not to
10 answer that question to the degree that any legal opinion
11 was provided by Counsel for the legislature or for the
12 Commission. If you can answer that question as to any other
13 information you should.

14 **THE WITNESS:** Can you repeat the question?

15 **MS. WAKNIN:** Can you read back the question,
16 please?

17 **THE REPORTER:** Of course. My apologies.

18 **(WHEREUPON, the reporter played the record as**
19 **requested.)**

20 **THE WITNESS:** Not that I'm aware of. There was
21 the Barreto assessment. Other than that though not that I'm
22 aware of.

23 **BY MS. WAKNIN:**

24 **Q. What did Dr. Barreto say about the map that you**
25 **had drawn for Commissioner Graves about its compliance with**

1 **the Voting Rights Act?**

2 A. If I recall correctly he said that it was
3 noncompliant.

4 **Q. Why did he say that?**

5 **MS. GOLDMAN:** Objection. Calls for speculation.
6 Lack of foundation.

7 **THE WITNESS:** I would have to review the
8 complaint. Or the -- not the complaint. I'd have to review
9 the analysis.

10 **BY MS. WAKNIN:**

11 **Q. Did Commissioner Graves hire any social scientist**
12 **or voting expert on voting patterns to do any similar**
13 **analysis on voting patterns on Latinos versus non-Latinos in**
14 **the --**

15 **MS. GOLDMAN:** Objection. Sorry. Objection.
16 Vague and ambiguous. Calls for speculation. Lack of
17 foundation.

18 **BY MS. WAKNIN:**

19 **Q. You can answer.**

20 A. Not that I'm aware of.

21 **Q. Did you ask Commissioner Graves to hire anyone --**
22 **hire any social scientist or expert in voting patterns to do**
23 **similar analysis of voting patterns of Latinos versus non-**
24 **Latinos in the Yakima Valley region?**

25 A. I don't believe so.

1 Q. Did anyone do an analysis to your knowledge of
2 voting patterns in the state of Washington for the purpose
3 of redistricting?

4 MS. GOLDMAN: Objection. Calls for speculation.
5 Lack of foundation.

6 THE WITNESS: Did anyone? I don't know.

7 BY MS. WAKNIN:

8 Q. Did anyone do an analysis of voting patterns that
9 were hired by the Washington Redistricting Commission that
10 you know of?

11 A. Not that I'm aware of.

12 MS. WAKNIN: I think we're going to take right now
13 a five-minute break. Actually, can we take a ten-minute
14 break? Does that sound okay? Can we be off the record?

15 THE REPORTER: Absolutely. We are off --

16 MS. WAKNIN: We'll do ten minutes. I'm sorry.

17 THE REPORTER: We are off the record. The time is
18 2:22 p.m.

19 (WHEREUPON, a recess was taken.)

20 THE REPORTER: We are back on the record. The
21 time is 2:33 p.m.

22 BY MS. WAKNIN:

23 Q. Okay. So Mr. Grose, I'm going to pull up the
24 September 21st email. Okay. Mr. Grose, did you create the
25 top eight district partisanship breakdown spreadsheets?

1 MS. GOLDMAN: I'm sorry. I can't hear you.

2 BY MS. WAKNIN:

3 Q. Did you create the spreadsheets about the top
4 eight partisan breakdown for districts?

5 MS. GOLDMAN: Objection. Calls for speculation.

6 THE WITNESS: I believe so.

7 MS. WAKNIN: Okay. I'm going to introduce as --
8 this is Exhibit 2 and provide a copy. I'll give you -- I'm
9 so sorry. I'm just going to give you all the copies.

10 (Whereupon, Exhibit 2 was marked for
11 identification.)

12 MS. GOLDMAN: Thank you. Simone Leeper is going
13 to pull it up on the Zoom for everyone at home.

14 MS. LEEPER: I'm also dropping it in the chat
15 because people asked for it. Maybe not.

16 MS. WAKNIN: I'm going to wait for her to pull it
17 up.

18 BY MS. WAKNIN:

19 Q. Did you take a second to read it?

20 A. Yes.

21 Q. Okay. Can you identify this document for me?

22 A. This email?

23 Q. Yes. The email in front of you.

24 A. Identify the document being spoken about in the
25 email or the email itself? Yeah.

1 Q. Do you know what this document is in front of you?

2 A. I believe it's an email I sent; yes.

3 Q. Okay. And to who did you send it to?

4 A. Paul Graves and Evan Ridley.

5 Q. Okay. Can you read the subject line for me?

6 A. "For Brunner".

7 Q. What is that referring to?

8 A. Seattle Times political reporter.

9 Q. What's his name?

10 A. Oh my gosh. Dave Brunner. It's skipping my mind
11 right now. Yeah.

12 Q. And the date is September 21, 2021; is that
13 correct?

14 A. That looks correct.

15 Q. Okay. Can you read to me what you wrote in this
16 email?

17 A. I said, quote, "This is a really good
18 visualization here. Was this somewhat what you were looking
19 for?"

20 Q. And can you read to me what the attachment says?

21 A. "Top 8 District Partisanship Breakdown".

22 Q. I'm going to attach as Exhibit 3 -- we're going to
23 pull up the Excel of that attachment. So I will hand this
24 out to you.

25 (Whereupon, Exhibit 3 was marked for

1 **identification.)**

2 **MS. GOLDMAN:** Thank you. Is it just two pages?

3 **MS. WAKNIN:** It's just two pages. Yeah.

4 **MR. HUGHES:** I guess I have an extra one.

5 **MS. GOLDMAN:** Yeah.

6 **MS. WAKNIN:** Oh. Well, you can just give it to
7 me. It's my copy.

8 **MR. HUGHES:** Oh.

9 **MS. WAKNIN:** Yeah. It's like, you can have it.

10 **BY MS. WAKNIN:**

11 **Q. You can take a second to look over this.**

12 **MR. HUGHES:** I'm just going to object that there's
13 nothing to indicate that this is the attachment that was
14 attached to this email.

15 **BY MS. WAKNIN:**

16 **Q. So on these, if you're on the Zoom, there's the --**
17 **can you read the Zoom, Mr. Grose?**

18 **MS. GOLDMAN:** What part do you want him to read?

19 **BY MS. WAKNIN:**

20 **Q. Can you read the line next to the Adobe PDF symbol**
21 **of the attachment name?**

22 **A. It's kind of gray. If you maybe click on the --**

23 **Q. I'm --**

24 **A. Yeah.**

25 **Q. Is that better?**

1 A. It's pretty blurry.

2 MS. WAKNIN: Can you zoom in?

3 THE WITNESS: Yeah.

4 MS. WAKNIN: Do you know how?

5 MS. MULHALL: So I can't zoom in to the title --

6 MS. WAKNIN: Okay.

7 MS. MULHALL: -- of the document. It won't let me
8 make that any bigger.

9 MS. WAKNIN: Okay.

10 MS. GOLDMAN: It's not blurry on my version. So
11 do you mind if I flip my laptop?

12 MS. WAKNIN: That should --

13 MR. HUGHES: And I can also just read it --

14 MS. WAKNIN: Yeah.

15 MR. HUGHES: -- into the record if that --

16 MS. WAKNIN: Can you read it into the record?

17 MR. HUGHES: Yeah. So it looks to me like it says
18 "Top Eight District Partisanship Breakdown.xlsx.pdf".

19 BY MS. WAKNIN:

20 Q. I'm going to represent to you that's the title or
21 the name of this document. Does that name match the email
22 that you had sent?

23 MS. GOLDMAN: Objection as to form. Vague.

24 THE WITNESS: "Top Eight District Partisanship
25 Breakdown". Yes. That is the attachment on the email.

1 **BY MS. WAKNIN:**

2 **Q. Okay. Do you recognize this document?**

3 **MS. GOLDMAN:** And I'm going to object that it
4 calls for speculation. There are many, many documents and
5 charts that look similar in this case. And there's no
6 ability for this witness to confirm that this is actually
7 the attachment that he sent. Go ahead if you can.

8 **THE WITNESS:** We did create a lot of these charts.
9 This looks like many of them; yes.

10 **BY MS. WAKNIN:**

11 **Q. Does this look like a type of -- the types of**
12 **charts that you had created?**

13 **A. Yes.**

14 **Q. Okay. Can you explain to me what the red is in**
15 **this chart? What the red represents.**

16 **A. Right. So the red and the blue would both**
17 **indicate save districts, districts that we would assume**
18 **based on -- I don't want to assume here. But whatever map**
19 **this was assigned to, this would have been -- this would**
20 **indicate generally that the districts in red would have been**
21 **likely Republican districts. Districts in blue would have**
22 **been likely Democrat districts. And districts in green**
23 **would be likely competitive districts.**

24 **Q. Is that how you would often -- strike that. Is**
25 **that the key that you used for all the types of these top**

1 eight breakdowns that you would create? The red, the green,
2 and the blue representing those things.

3 MS. GOLDMAN: Objection. Vague.

4 THE WITNESS: As far as I can recall, yes. I
5 don't know if I used different keys in different ones
6 though. But there were a lot of these spreadsheets.

7 BY MS. WAKNIN:

8 Q. Can you read to me the -- in row one it says --
9 it'll say district. Can you read to me row one?

10 A. Yep. Row one, district, current. District, Fain.
11 District, Walkinshaw. District, Graves. District, Simms.

12 Q. Okay. And under the name on this PDF Excel
13 there's then the list of percentages. Is that correct for
14 the district performance?

15 MS. GOLDMAN: Objection. The document speaks for
16 itself.

17 THE WITNESS: Yeah. The percentages would speak
18 to the -- according to the top eight metrics, the
19 performance of the district by percentage of likely
20 Republican vote.

21 BY MS. WAKNIN:

22 Q. And in the Graves' proposal or Graves -- whatever
23 for Graves -- what is the percentage of Republican vote for
24 district 15?

25 A. For whatever map that this was for, that would be

1 59.48 percent.

2 Q. And then for district 14.

3 A. That would be 55.72 percent.

4 Q. Did you normally compare, when you made
5 spreadsheets that compared districts, did you normally
6 compare different maps against each other in the
7 spreadsheets?

8 MS. GOLDMAN: Objection as to form. Vague.

9 THE WITNESS: Sorry. Say that one more time.

10 BY MS. WAKNIN:

11 Q. When you created spreadsheets that compared the
12 top eight performance of districts did you normally compare
13 multiple maps against each other in these spreadsheets?

14 A. Yes. Yeah.

15 Q. There's four names on this spreadsheet; is that
16 correct? Commissioner names.

17 A. That is correct.

18 Q. Okay. And would this correspond to the four maps
19 that were introduced by the commissioners on September 21,
20 2021?

21 MS. GOLDMAN: Objection. Calls for speculation.

22 THE WITNESS: Yeah. I can't say for sure. But it
23 looks that way.

24 BY MS. WAKNIN:

25 Q. And in the Commissioner Graves' map that was

1 introduced on September 21, 2021, the legislative district
2 15 was the one that was identified as the Latino or Hispanic
3 district; is that correct?

4 MS. GOLDMAN: Objection as to form. Vague.

5 THE WITNESS: What I believed -- again, I'm not
6 saying I saw the specific numbers for that corresponding
7 15th district that you see the percentage for on this chart.

8 Again, without seeing that I can't say for
9 certain. I believe it was, at the time, to my best of my
10 recollection, that was a majority-minority VAP district.
11 Maybe not specifically Hispanic VAP district. Again,
12 without seeing that I can't say for certain. That's what
13 seems to be here.

14 BY MS. WAKNIN:

15 Q. And that district is 59.48 percent performs
16 Republican.

17 A. By this metric, yes.

18 Q. Okay. And what was this metric? Again, was this
19 -- strike that. Can you go into how you created this --
20 these metrics on performance?

21 MS. GOLDMAN: Objection as to form. Vague.

22 THE WITNESS: Yeah. I believe these were put into
23 autoBound Edge. It was a while ago. I can't remember all
24 the inputs that, again, that went into it. But these
25 numbers should be pulled directly from autoBound Edge.

1 **BY MS. WAKNIN:**

2 **Q. Okay. And were they the cumulative of multiple**
3 **elections on the partisan score?**

4 **A. Correct. Yeah. They were the aggregate of**
5 **multiple elections.**

6 **Q. Which elections?**

7 **A. To the best of my memory, statewide elections that**
8 **were held in 2020.**

9 **Q. Okay. And who put those election results into**
10 **Edge?**

11 **MS. GOLDMAN:** Objection. Calls for speculation.

12 **THE WITNESS:** I believe Paul would have -- Paul
13 Campos would have done the technical work on getting those
14 in. Yeah.

15 **BY MS. WAKNIN:**

16 **Q. Were there any other elections besides the**
17 **statewide 2020 elections that would create the cumulative**
18 **score?**

19 **MS. GOLDMAN:** Objection. Vague.

20 **THE WITNESS:** Again, I don't think so. Best of my
21 memory is it was aggregate of 2020 statewide elections.

22 **BY MS. WAKNIN:**

23 **Q. Who put each of Graves' draft maps into Edge to**
24 **create performance reports?**

25 **MR. STOKESBARY:** Objection. Calls for

1 speculation.

2 **BY MS. WAKNIN:**

3 **Q. You can answer.**

4 **A.** Can you rephrase that?

5 **MS. WAKNIN:** Could you read the question back to
6 him?

7 **(WHEREUPON, the court reporter played the record**
8 **as requested.)**

9 **THE WITNESS:** Sorry. Can you play that one more
10 time? I just didn't catch --

11 **THE REPORTER:** Of course.

12 **THE WITNESS:** -- the beginning of it. Yeah.

13 **(WHEREUPON, the court reporter played the record**
14 **as requested.)**

15 **THE WITNESS:** You asked who put --

16 **BY MS. WAKNIN:**

17 **Q. Who?**

18 **A.** Graves' map. Oh, right. So the map as it's in
19 the program, it automatically generates these onto the
20 spreadsheet. So --

21 **THE REPORTER:** My apologies. I have to go off the
22 record for a moment to see what's going on. I'm having a
23 technical difficulty.

24 **MS. WAKNIN:** Okay. All right. So we're off the
25 record at 2:50.

1 **THE REPORTER:** Yes. We are off the record. The
2 time is actually 2:48 p.m.

3 **(WHEREUPON, a recess was taken.)**

4 **THE REPORTER:** We are back on the record. The
5 time is 2:52 p.m.

6 **MS. WAKNIN:** Okay.

7 **BY MS. WAKNIN:**

8 **Q.** So Mr. Grose, I'm going to move on from the top
9 eight. I'm going to go back to the Barreto report. So
10 after the Barreto report comes out did any of the
11 commissioners provide or publicly submit new maps?

12 **A.** Yes. I believe Commissions Walkinshaw and Simms
13 released revised drafts.

14 **Q.** Can any commissioner release revised maps?

15 **MS. GOLDMAN:** Objection. Asked and answered. Oh,
16 can or did?

17 **MS. WAKNIN:** Can.

18 **MS. GOLDMAN:** Oh. I'm sorry. I withdraw my
19 objection. Vague.

20 **THE WITNESS:** I suppose they could. It would have
21 been unorthodox I guess would be a good way to put it. I
22 suppose they could. Yeah.

23 **BY MS. WAKNIN:**

24 **Q.** What was different about the Walkinshaw map that
25 was released after the Barreto report?

1 **MS. GOLDMAN:** Objection. Calls for speculation.

2 **THE WITNESS:** Without seeing a picture of it I
3 cannot give specifics or certainties. But they did alter
4 the greater Yakima region if I recall correctly -- again,
5 without it sitting in front of me I can't say for sure -- to
6 look much more like the proposed versions in the Barreto
7 report.

8 **BY MS. WAKNIN:**

9 **Q.** Did Commission Walkinshaw give a public reason for
10 why they had edited the 15th or 14th legislative districts
11 in their new map?

12 **MS. GOLDMAN:** Objection. Calls for speculation.

13 **THE WITNESS:** I believe it was accompanied with a
14 statement. I cannot recall what the statement specifically
15 said.

16 **BY MS. WAKNIN:**

17 **Q.** Did you have opinions about the statement by
18 Commissioner Walkinshaw?

19 **A.** I --

20 **MS. GOLDMAN:** Objection. Vague.

21 **THE WITNESS:** Yeah. I cannot recall the statement
22 well enough to remember if I had an opinion or not.

23 **BY MS. WAKNIN:**

24 **Q.** Did you have opinions about Commission
25 Walkinshaw's new map with respect to the 14th and 15th

1 **legislative districts?**

2 **MS. GOLDMAN:** Objection. Calls for speculation.

3 **THE WITNESS:** Sorry. Can you say the question one
4 more time?

5 **BY MS. WAKNIN:**

6 **Q.** Did you have any opinions with respect to
7 Commission Walkinshaw's map that altered the 15th and 14th
8 legislative districts?

9 **MS. GOLDMAN:** Objection. Calls for speculation.

10 **THE WITNESS:** Yeah. My opinion and my
11 recollection of that revised map that was made public by
12 Commission Walkinshaw -- and if I'm recalling the recorrect
13 map -- it resembled the proposed districts by -- similar to
14 the Barreto analysis. Barreto, excuse me. Barreto. It
15 resembled those. And my opinions on that district were
16 similar to that that I saw in the Barreto analysis. Yeah.

17 **BY MS. WAKNIN:**

18 **Q.** Did Commissioner Graves have any opinion about the
19 new Walkinshaw map that he expressed to you?

20 **MS. GOLDMAN:** Objection. Calls for speculation.
21 Lack of foundation.

22 **THE WITNESS:** His specific thoughts on it I cannot
23 recall at the time.

24 **BY MS. WAKNIN:**

25 **Q.** Did you talk to Commissioner Graves about the maps

1 that other commissioners had proposed?

2 A. Sure. We had plenty of discussions on proposed
3 maps. Specific conversations though I couldn't recall
4 without additional context.

5 Q. And when you spoke with Commissioner Graves --
6 about how many times did you speak with Commissioner Graves
7 about the commission maps -- the maps that other
8 commissioners had proposed?

9 A. I'm sure many times. I couldn't say for certain
10 how many times.

11 Q. Were those meetings usually over the phone or via
12 text?

13 A. Usually over the phone, video call, email. Those
14 types of things.

15 Q. And when Commissioner Graves would talk to you
16 about other commissioners' maps did the conversation talk --
17 within the conversation did you talk about who'd make edits
18 to Commissioner Graves's maps?

19 A. Could you rephrase?

20 Q. When you're talking with Commissioner Graves about
21 the other commissioners' proposed maps did you have -- did
22 Commissioner Graves -- or was there discussion with
23 Commissioner Graves about any changes that could be made to
24 the name -- to the maps under Commissioner Graves's name?

25 MS. GOLDMAN: Objection. Vague.

1 **THE WITNESS:** In terms of incorporating other
2 ideas from other maps, I can't speak for Commissioner
3 Graves. Certainly I think there were ideas picked up. I
4 think, again, the proposed maps more signal sending than
5 maybe rock-solid ideas in some cases.

6 So I think it -- those provided a good roadmap for
7 where we might want to incorporate some other ideas or
8 places that we could find common ground or places that were
9 going to differ. Yeah.

10 **BY MS. WAKNIN:**

11 **Q.** What was different between Commissioner
12 Walkinshaw's map that he released in October versus the
13 September map?

14 **MS. GOLDMAN:** Objection. The document speaks for
15 itself and it calls for speculation.

16 **THE WITNESS:** Yeah. For specifics I would have to
17 review both those maps to make a judgment on that.

18 **BY MS. WAKNIN:**

19 **Q.** Did Commissioner Walkinshaw's October map have a
20 Hispanic majority CVAP district for the 14th legislative
21 district?

22 **MS. GOLDMAN:** Objection. Calls for speculation.

23 **THE WITNESS:** Again, I'd have to see the map and
24 obviously the specific analytics that go with it to say for
25 sure. But to the best of my knowledge I believe it did.

1 BY MS. WAKNIN:

2 Q. Did Commissioner Graves express to you after
3 Commissioner Walkinshaw's map was released that Commissioner
4 Graves had to change his 15th or 14th legislative district?

5 A. Say that one more time.

6 Q. Did Commissioner Graves ever express to you after
7 Commissioner Walkinshaw's map was released that he had to
8 change -- that Commissioner Graves had to change his 15th or
9 14th legislative district?

10 A. If I recall the time period correctly, I think we
11 knew that in order to find consensus that we were likely
12 going to have to change our version, I suppose, but change
13 the 15th district from what, at least, we had proposed, that
14 it was not going to look the way that we did if we were
15 going to find consensus.

16 Q. What were the changes that you thought necessary
17 or that was necessary to get to a consensus?

18 MS. GOLDMAN: Objection. Vague.

19 THE WITNESS: It felt like in this -- it felt like
20 we were certainly going to have to have a CVAP Hispanic
21 majority district, which we ultimately ended up with.

22 I am recalling some of the discussions between
23 commissioners about that. I think that was certainly a line
24 kind of drawn that we were ultimately going to do that.

25 BY MS. WAKNIN:

1 Q. So that was just decided after the October --
2 after these two new maps came out? That a Latino majority
3 CVAP district had to be drawn in the Yakima area.

4 A. I can't say precisely when that became, you know,
5 ironclad, I guess, so to speak. Yeah. I just can't say for
6 sure on the time period.

7 Q. But that was a certain that there was going to be
8 a majority Latino CVAP district?

9 A. In my opinion that always seemed -- or I should
10 say it seemed increasingly inevitable.

11 Q. Why?

12 A. Because there seemed to be, well, different
13 viewpoints but questions on what the -- it's complicated.
14 There seemed to be differing opinions on exactly what was
15 going to be subject to the Voting Rights Act by the
16 commissioners, what wasn't, what specifically, if anything,
17 we were required to do in this scenario or not required to
18 do. And it wasn't entirely clear. That's the impression
19 that I had gotten from what I'd herd.

20 Q. Did Paul Graves tell you what was required in this
21 scenario when it came to you -- the VRA and map drawing?

22 MS. GOLDMAN: Objection. Vague.

23 THE WITNESS: I'm not totally -- I can't say for
24 certain.

25 BY MS. WAKNIN:

1 Q. Did you ever have a conversation with Commissioner
2 Graves after the Barreto report came out about requiring a
3 district that would perform for Latino candidates of choice?

4 A. I can't speak to -- yeah. I can't recall off the
5 top of my head.

6 Q. Do you know what a candidate of choice is?

7 A. A candidate that you are likely to vote for.

8 Q. Had you ever been told the term candidate --
9 explained -- strike that. Has anyone ever used the term in
10 the context of redistricting with you as to the idea of a
11 candidate of choice for a minority population?

12 A. I believe this only would have come up when the
13 discussions around CVAP really started. Other than that I
14 don't believe so.

15 Q. During what time when those discussions about CVAP
16 -- when did they get really started?

17 A. Closer to the deadline. Can't say exactly when.
18 There was, again, a lot going on in that period. I want to
19 say right around then but I couldn't give a specific date.

20 Q. And so was the conversation around the nearing of
21 the end of the redistricting process about Latinos'
22 candidates of choice in the Yakima Valley region?

23 A. That was one of many different discussions we were
24 having -- that commissioners were having, staff. I mean,
25 there are 47 other districts outside of the 14th and 15th.

1 Q. So when we're talking specifically about the 14th
2 and 15th legislative district, when -- as was said to, like,
3 a negotiating district, was the conversation around whether
4 or not Latinos in that area could elect their candidates of
5 choice?

6 MS. GOLDMAN: Objection. Vague as to time, as to
7 location, as to participants. Calls for speculation. Lack
8 of foundation.

9 BY MS. WAKNIN:

10 Q. You can answer.

11 A. There's one particular time during negotiations
12 where I believe Commissioner Walkinshaw had essentially
13 indicated that if they didn't get the political performance
14 that they wanted in the 15th district that he may not vote
15 for the map. There were lots of back and forth at that
16 period so I can't recall all the context to that
17 conversation. I think that answers your question.

18 Q. So I want to know if someone had used the term --
19 when we're talking about the nearing of the end -- strike
20 that. What was your understanding of Commissioner
21 Walkinshaw's idea of what political performance was
22 important in the 15th and 14th legislative district?

23 MS. GOLDMAN: Objection. Calls for speculation.
24 Lack of foundation.

25 THE WITNESS: Can you say the question one more

1 time?

2 **MS. WAKNIN:** Can you read back the question,
3 please?

4 **(WHEREUPON, the reporter played the record as**
5 **requested.)**

6 **MS. WAKNIN:** We'll carry your objection.

7 **THE WITNESS:** I believe he wanted to add
8 additional Democratic seats out of the State legislature.

9 **BY MS. WAKNIN:**

10 **Q. What happened from November 11 to November 15,**
11 **2021 during the redistricting cycle?**

12 **MR. HUGHES:** Objection. Vague.

13 **MS. GOLDMAN:** Join.

14 **THE WITNESS:** I can't give a specific timeline on
15 those dates, but that was, well, obviously, just prior to
16 the deadline. So those were very frenzied time. Lots of
17 negotiation, redrafting. But felt like basically we were on
18 the clock at that point in time.

19 **BY MS. WAKNIN:**

20 **Q. It felt like what?**

21 **A. Frenzied.**

22 **Q. What other words would you use to describe that**
23 **week leading up to the deadline for when new -- when maps**
24 **had to be approved?**

25 **A. Well, it just became busier. Clearly, you know,**

1 we, you know, like the Commissioner sensed, you know, time
2 was running out. As I understand it, in past years this is
3 typically how negotiations go to get to the, you know,
4 latest possible time period to, you know, make sure all
5 interested parties -- obviously the commissioners -- have
6 time to, you know, try to get everything that they want to
7 get out of the map. So it was just very busy.

8 **Q. Who told you that that was -- that the busyness of**
9 **the time period was historically like that in other**
10 **redistricting cycles?**

11 **MS. GOLDMAN:** Objection. Misstates the testimony.

12 **THE WITNESS:** Paul Campos had mentioned that in
13 previous years it had gone down to the wire.

14 **BY MS. WAKNIN:**

15 **Q. Was there a final legislative district map by**
16 **November 11, 2021?**

17 **A.** Can you clarify?

18 **Q. Was there a final map that the redistricting**
19 **commissioners were considering from -- by November 11, 2021?**

20 **A.** I do not believe so.

21 **Q. Okay. Why wasn't there a final map?**

22 **A.** By November 11th?

23 **Q. Correct.**

24 **A.** They were still in the process of negotiating.

25 **Q. What was the disagreement or what was the**

1 **negotiations over specifically in the legislative district**
2 **map?**

3 A. At which point in time?

4 **Q. By November 11, 2021.**

5 A. To the best of my recollection at that period
6 there still seemed to be a large number of issues on the
7 table for negotiating. So I wouldn't say there was a
8 specific one. Many districts still being discussed at that
9 point.

10 **Q. By November 11, 2021, were the commissioners**
11 **discussing the 14th and 15th legislative districts?**

12 A. Those had been in ongoing conversation as I
13 remember it. I think they'd been discussing those for
14 several weeks to my recollection.

15 **Q. And what was the main disagreement about by -- on**
16 **November 11, 2021 by that time period about the 14th and**
17 **15th legislative districts?**

18 A. I couldn't say at what part of the negotiation
19 they were at at that point in time.

20 **Q. Okay. Was there a disagreement about whether the**
21 **majority Latino district should be labeled the 14th district**
22 **or the 15th district?**

23 A. I don't recall that being a disagreement among the
24 commissioners. That may have come up. I do recall that
25 being -- a point was made somewhere. It might have been in

1 the Barreto analyses. I recall seeing that somewhere, but I
2 don't remember that being a big topic of discussion among
3 the commissioners.

4 **Q. You remember seeing -- can you just clarify? You**
5 **remember seeing what?**

6 A. Oh --

7 **MS. GOLDMAN:** Objection. Vague. Asked and
8 answered.

9 **THE WITNESS:** The alteration of changing the
10 numbering in the districts between 14 and 15.

11 **BY MS. WAKNIN:**

12 **Q. When do elections happen in off-year -- for**
13 **legislative districts when the district is labeled as an odd**
14 **district number?**

15 A. Those would happen in mid-term years.

16 **Q. Is there any other way to call mid-term year?**

17 **MS. GOLDMAN:** Objection. Vague.

18 **THE WITNESS:** An election year?

19 **BY MS. WAKNIN:**

20 **Q. Would you call a mid-term year an off-year**
21 **election?**

22 A. My personal vernacular, I use that for odd-year
23 elections. 2019, 2021, 2023 and such.

24 **Q. Is turnout different between mid-term years and**
25 **presidential years in Washington state?**

1 **MR. STOKESBARY:** Objection. Calls for
2 speculation.

3 **BY MS. WAKNIN:**

4 **Q. You can answer.**

5 A. From my understanding, historically turnout has
6 been lower in non-presidential years, although that trend is
7 actually very quickly changing.

8 **Q. How do you know that trend is changing?**

9 A. We're seeing uniformly higher turnout in recent
10 years.

11 **Q. Who's "we"?**

12 A. There has been uniformly higher turnout. Let me
13 rephrase that. Thank you.

14 **Q. So would the legislative district 15 then vote in**
15 **mid-term years for the next ten years after redistricting if**
16 **it was labeled 15?**

17 A. Yes.

18 **Q. And legislative district 14 would elect in**
19 **presidential years; is that correct?**

20 A. Well, let me -- can I clarify a statement?

21 **MS. GOLDMAN:** Absolutely.

22 **THE WITNESS:** Going back to the last statement,
23 district 15 would hold elections both in presidential years
24 and -- I call them mid-term years; you call them off years.
25 The Senate seat in particular in the 15th would be elected

1 in mid-term election years. Or, as you call it, off years.

2 So that being said, they would both hold elections
3 on both mid-term years and presidential years. But it's that
4 Senate seat in particular -- that would be elected by -- or
5 sorry, be elected in off years.

6 **BY MS. WAKNIN:**

7 **Q. Okay. And let the record state I don't refer to**
8 **them as off years. I just asked if you could -- if you**
9 **refer to them as off years.**

10 **A. Oh. Mid-term election years. Right. Okay.**

11 **Q. Can you give me a summary of the different states**
12 **of negotiation on the LD 15 and 14 that you were aware of in**
13 **the days leading up to November 15?**

14 **MR. HUGHES:** Objection. Vague.

15 **MS. GOLDMAN:** Objection. Calls for speculation.

16 **THE WITNESS:** Really tough to say stages as
17 commissioners would get stuck on one thing and move to
18 another in order to try maintaining progress. And obviously
19 as we get to -- or get closer and closer to the deadline I
20 -- it was my impression they wanted to come to as much
21 consensus as possible. So skipping over items that were
22 contentious.

23 And this doesn't just go to the 15th or 14th
24 district. Just across the map. So it's really hard to
25 recall a specific timeline on negotiations for any given

1 district for that reason.

2 **BY MS. WAKNIN:**

3 Q. You know, were there particular talking points
4 that you heard from Commissioner Graves with respect to
5 legislative district 14 and 15 from the week -- during the
6 week leading up to the deadline on November 15th?

7 **MS. GOLDMAN:** Objection. Vague.

8 **THE WITNESS:** I don't recall any kind of talking
9 points. Not that I can recall.

10 **BY MS. WAKNIN:**

11 Q. Was there something of importance about
12 legislative district 15 and 14 for Commissioner Grave (sic)
13 in the weeks leading -- in the week of November 15th --
14 leading up to November 15th?

15 **MS. GOLDMAN:** Objection. Calls for speculation.

16 **THE WITNESS:** Right. I can't say what
17 specifically Commissioner Graves was thinking in that
18 scenario. But because it was important to our Democratic
19 counterparts, it was important to us as well.

20 **BY MS. WAKNIN:**

21 Q. Did you draw -- after the Barreto report did you
22 draw a majority Latino CVAP district in the Yakima Valley
23 region?

24 A. I think so. I would have to go back and look.

25 Q. Why did you draw that majority Latino CVAP

1 **district after October 25th?**

2 A. Again, because we -- I can't say specifically the
3 date that I would have drawn that district because would
4 have felt at that point it was pretty apparent that was
5 going to be, as I have mentioned several times now, that
6 that was going to be a very important point to reach
7 consensus.

8 **MS. WAKNIN:** I'm going to introduce -- I'm so
9 sorry. Jennifer, what exhibit are we up to? Okay. I'm
10 going to introduce Exhibit 4, an email, here.

11 **(Whereupon, Exhibit 4 was marked for**
12 **identification.)**

13 **MS. GOLDMAN:** Is one of these for the exhibit?

14 **THE REPORTER:** I have --

15 **MS. WAKNIN:** Oh --

16 **MS. GOLDMAN:** Oh. So it's good.

17 **MS. WAKNIN:** Okay. Yeah. And then, Simone, can
18 you pull it up?

19 **MS. LEEPER:** Mm-hmm.

20 **BY MS. WAKNIN:**

21 **Q. Have you taken a second to review that document in**
22 **front of you?**

23 A. I have.

24 **Q. Can you tell me what the document that you have in**
25 **front of you is?**

1 A. It appears to be an email with an attachment.

2 Q. Okay. Is that email from you?

3 A. This appears to be from me.

4 Q. Okay. Do you have any reason to doubt that this
5 email is from you?

6 A. I don't believe so.

7 Q. Okay. And the email is to Paul Graves; is that
8 correct?

9 A. That is correct.

10 Q. And what's the date on this email?

11 A. This would be Thursday, November 11, 2021.

12 Q. Okay. And is there any words in this email?

13 MS. GOLDMAN: Objection. The document speaks for
14 itself.

15 THE WITNESS: Other than my signature I do not
16 believe so.

17 BY MS. WAKNIN:

18 Q. Okay. Can you read the attachment file name for
19 me?

20 A. "Prop Metrics 11-11.xlsx".

21 Q. Okay. And what would that -- prop metrics -- what
22 would that be referring to?

23 A. Without seeing the document I cannot recall. We
24 exchanged lots of documents, especially as we moved further
25 into the process.

1 Q. So when you discussed -- when you would -- if a
2 document from you to Paul Graves had the name metrics in it
3 what generally would be in there?

4 A. I would imagine metrics.

5 Q. With respect to maps.

6 A. We shared all sorts of data. It could be
7 political, demographic. It could be any number of things.

8 Q. And do you know what this would be referring to?
9 Prop Metrics 11-11.

10 MS. GOLDMAN: Objection. Asked and answered.

11 THE WITNESS: Yeah. I could not remember this
12 specific attachment without seeing a copy of the attachment.

13 BY MS. WAKNIN:

14 Q. So I'm going to represent that Plaintiff's Counsel
15 downloaded the attachment to this email and we will be
16 introducing as Exhibit 5 that document that is attached to
17 the email. And I will provide it for you all. Here you
18 are. I believe it's two pages long. You can take a second
19 to look over that.

20 (Whereupon, Exhibit 5 was marked for
21 identification.)

22 MS. GOLDMAN: And I'm just going to object to the
23 questions that follow as to authenticity and that this will
24 call for speculation as there's no way for this witness to
25 confirm that this Exhibit 5 is the actually attachment

1 referenced in Exhibit 4.

2 **BY MS. WAKNIN:**

3 **Q. I will also represent this is a PDF version of an**
4 **Excel spreadsheet that was produced to us -- to Plaintiff's**
5 **Counsel. Have you been able to review the document in front**
6 **of you, Mr. Grose?**

7 **A. One more second would be great. Okay. I have**
8 **reviewed the document.**

9 **Q. Do you recognize this document?**

10 **A. This one I actually do not recognize.**

11 **Q. Was anyone besides yourself pulling metrics or**
12 **performance metrics for maps?**

13 **MS. GOLDMAN:** Objection. Calls for speculation.
14 Lack of foundation.

15 **THE WITNESS:** Similar to this format I do not
16 believe so. I suspect all legislative staff were -- excuse
17 me. All Redistricting Commissioner staffers were doing
18 similar documents. But this, I can't -- yeah.

19 **BY MS. WAKNIN:**

20 **Q. What's different about this document than one that**
21 **you would have made?**

22 **MS. GOLDMAN:** Objection. Calls for speculation.
23 Lacks foundation.

24 **THE WITNESS:** I can't say for certain.

25 **BY MS. WAKNIN:**

1 Q. So there's nothing different; you just know that
2 this is a different document than one that you would have
3 made.

4 MS. GOLDMAN: Objection. Misstates the testimony.

5 THE WITNESS: Yeah. No; I did not say that. It
6 looks similar to a document that I would have made. I just
7 simply do not recall making this.

8 BY MS. WAKNIN:

9 Q. Would there have been anyone else who was making
10 something like this --

11 MS. GOLDMAN: Object --

12 BY MS. WAKNIN:

13 Q. -- for Paul Graves?

14 MS. GOLDMAN: Objection. Calls for speculation.
15 Asked and answered.

16 THE WITNESS: Not for Commissioner Graves, no.

17 BY MS. WAKNIN:

18 Q. Can you read the column two for -- row two for me?

19 A. Row two. District, Davison 20 percentage.
20 Abbreviated Davidson 20 change. District Davidson 20
21 percentage. Abbreviated Davidson 20, abbreviated change.
22 District R percentage.

23 Q. Okay. And can you read row one for me?

24 A. Row one is Graves, Fain, and current.

25 Q. Okay. On the previous metric Excels that you've

1 created what did current mean when you had written current
2 on an Excel for metrics?

3 A. Current would have been the 2011 maps.

4 Q. And that's what refer to as current?

5 A. Correct.

6 Q. Okay. Did anyone else refer to the 2011 map as
7 the current map?

8 MS. GOLDMAN: Objection. Calls for speculation.
9 Lack of foundation.

10 THE WITNESS: That's how I thought about it. At
11 the time they were the current maps, so --

12 BY MS. WAKNIN:

13 Q. And so would you understand for, let's say, for
14 Row B if it's the -- I can't -- it's Graves and then
15 Davidson it'd be referring to Graves' map and then Davidson
16 would be a candidate?

17 MS. GOLDMAN: Objection. Calls for speculation.

18 MR. STOKESBARY: Object to form. Vague.
19 Misstates -- mischaracterizes the evidence.

20 MS. GOLDMAN: Objection. Calls for speculation,
21 lack of foundation.

22 THE WITNESS: The Davidson percentage was an
23 agreed-upon metric by the commissioners to evaluate partisan
24 performances of districts.

25 BY MS. WAKNIN:

1 Q. Who is Davidson?

2 A. Former State Treasurer Duane Davidson.

3 Q. Okay. So the Davidson map was another -- the
4 Davidson election was an additional election that was agreed
5 upon with the commissioners for measuring the performance of
6 the district; is that correct?

7 A. Not additional. Top eight was never an agreed-
8 upon metric. Only the Davidson-Pellicciotti -- the other
9 candidate in that election -- only those numbers were agreed
10 upon by all four commissioners to evaluate the maps. Yeah.

11 Q. And when was that? When was the Davidson-
12 Pellicciotti election agreed upon as the election that would
13 be the one that you would compare partisan performance?

14 A. I couldn't say precisely when.

15 Q. When did you start using that race as a
16 measurement for Commissioner Graves's maps on district
17 performance?

18 A. Same answer. I couldn't remember precisely when.

19 Q. Not even a ballpark of when you started using that
20 election?

21 A. Yeah. I have no idea.

22 Q. Commissioner Graves just told you one day that was
23 going to be the race that you used for measuring partisan
24 performance of districts for his maps; is that --

25 A. As soon as it was agreed upon I'm certain that's

1 when I likely would have started using that.

2 **Q. Okay. Did you have any discussions with**
3 **Commissioner Graves regarding Fain's legislative district 15**
4 **performance for Democratic candidates?**

5 **MS. GOLDMAN:** Objection. Vague.

6 **THE WITNESS:** Yeah. Sorry. Can you repeat that
7 one more time?

8 **BY MS. WAKNIN:**

9 **Q. So did you have any conversations with**
10 **Commissioner Graves about Commissioner Fain's legislative**
11 **district 15 performance for Democratic candidates?**

12 **MS. GOLDMAN:** Objection. Vague and ambiguous.

13 **THE WITNESS:** Not that I can recall. We likely
14 did, but not that I can recall.

15 **BY MS. WAKNIN:**

16 **Q. Did you have any discussions with Commissioner**
17 **Graves regarding Commissioner Simms's legislative 14 or 15**
18 **performance for Democratic candidates?**

19 **A.** In which map?

20 **Q. Well, let's start with the first map that was**
21 **proposed by April Simms.**

22 **MS. GOLDMAN:** Objection. Vague. Are you talking
23 about the one on the website?

24 **MS. WAKNIN:** The September 21st map.

25 **MS. GOLDMAN:** The public map?

1 **MS. WAKNIN:** The public map.

2 **THE WITNESS:** Her original proposed map. Yeah.

3 Without the numbers in front of me I couldn't say on
4 partisan performance. I think having -- again, I would need
5 to have the map in front of me.

6 But if I'm recalling the correct map I believe the
7 partisanship concerns were not a major concern on that map.
8 Much more of a concern was the lack of about any
9 redistricting principle in the configuration of 14 and 15 in
10 that map. But again, I would feel more comfortable seeing a
11 picture of that map to confirm that's the right map I'm
12 thinking of.

13 **BY MS. WAKNIN:**

14 **Q.** So I'm just asking if you had discussions with
15 Commissioner Graves about the map, not the map itself.

16 **MS. GOLDMAN:** Objection. Vague and ambiguous.

17 **THE WITNESS:** We likely did. I cannot recall.

18 **BY MS. WAKNIN:**

19 **Q.** All right. Let's turn to the chart in front of
20 you. All right. Can you read me the Davidson percentage
21 under Fain for district 15?

22 **A.** That would be 49.8 percent.

23 **Q.** And what would that mean?

24 **A.** This would be, according to the Davidson 2020
25 metric, this would be a very evenly balanced partisan wise

1 district.

2 **Q. And why is that?**

3 A. The closer this number is to 50 the more split, at
4 least according to the metric, the more partisan split --
5 I'm phrasing this incorrectly. The district is very 50-50
6 winnable by all candidates.

7 **Q. And can you read the performance for legislative**
8 **district 15 under Fain?**

9 **MS. GOLDMAN:** Didn't he just do that?

10 **MS. WAKNIN:** Oh, I thought I had asked for Graves.

11 **BY MS. WAKNIN:**

12 **Q. For Graves then.**

13 A. Here it is 58.08 percent. I will note though 14
14 in this example is at 52.4 percent.

15 **Q. Okay. What do you think -- so you mentioned that**
16 **-- you actually mentioned the 14th district without my**
17 **asking. Why did you point out that the 14th district was at**
18 **52.4 percent?**

19 A. Without seeing the specific map that this pertains
20 to that caveat -- without seeing the map this pertains to --
21 I'm assuming in that specific map we would have had an
22 alternate configuration where the 14th in this case was
23 likely going to be the majority CVAP district. But again, I
24 would need to see the map.

25 **Q. Are you saying the majority Hispanic CVAP**

1 **district?**

2 A. Yes. Yes.

3 **Q. Okay.**

4 A. Excuse me.

5 **MS. WAKNIN:** All right. I'm going to move on from
6 that. Let's take a five-minute break. Is that agreeable?
7 Can we go off the record for five minutes?

8 **THE REPORTER:** Yes. With that, we are off the
9 record. The time is 3:33 p.m.

10 **(WHEREUPON, a recess was taken.)**

11 **THE REPORTER:** We are back on the record. The
12 time is 3:41 p.m.

13 **BY MS. WAKNIN:**

14 **Q. So I am going to introduce Exhibit 6 --**

15 **THE REPORTER:** Seven.

16 **MS. WAKNIN:** Seven. Thank you. Exhibit 7.
17 Provide you a copy. Here you are, Jessica.

18 **MR. HUGHES:** I'm sorry. What was Exhibit 6?

19 **MS. WAKNIN:** I think it was --

20 **THE REPORTER:** Actually, no, you are correct. It
21 is Exhibit 6.

22 **MS. WAKNIN:** That's fine. It's Exhibit 6. Okay.
23 And this is the email.

24 **(Whereupon, Exhibit 6 was marked for**
25 **identification.)**

1 **BY MS. WAKNIN:**

2 **Q. Have you had a second to look over the exhibit?**

3 A. I have.

4 **Q. And what is the document in front of you?**

5 A. This is an email, it appears, that I sent to
6 Commissioner Graves.

7 **Q. Okay. And what is the date on this email?**

8 A. The date is Saturday, November 13, 2021.

9 **Q. Okay. And what was happening during November 13,**
10 **2021 with respect to the Washington redistricting?**

11 A. We were narrowing in very quickly on the deadline.

12 **Q. Was anything else happening with map drawing that**
13 **you were conducting possibly --**

14 **MS. GOLDMAN:** Objection. Vague.

15 **THE WITNESS:** To the best of my recollection we
16 were beginning to -- as the commissioners were coming to
17 more agreements in that period I think we were just doing a
18 lot of redrafting at that point in time, alternative
19 proposals to view with all the commissioners so all the
20 commissioners could kind of make a decision. Lots of
21 negotiation at that period so there was lots of small
22 changes, redrafting, things like that.

23 **BY MS. WAKNIN:**

24 **Q. And were the small changes that you made to any**
25 **maps -- were those directed by Commissioner Graves?**

1 A. Correct. And some were explicit than others. It
2 varied. Again, there were a lot of changes happening at
3 this point in time so I couldn't point to any specific
4 change.

5 **Q. And what platform were you using to draw maps**
6 **during November 11 to November 15, 2021?**

7 A. I would have used, in that time period, both Edge
8 and Dave's Redistricting.

9 **Q. Why would you be using Dave's Redistricting?**

10 A. As I stated earlier, that is what the -- our
11 Democratic counterparts were using and you could make
12 changes a little bit quicker, on the fly. So sometimes I
13 would use it just to map out something that's possible.

14 We know the metrics for that specific district,
15 then I can put that into a more formal form in autoBound
16 Edge. AutoBound Edge just moves very slow. And at times
17 like approaching the deadline it was sometimes much easier
18 to mock something up in Dave's and then transfer it to a
19 more formal program.

20 **Q. All right. So it's fair to say that you were**
21 **drawing maps in Dave's and then you would export the map in**
22 **a shape file and upload it to autoBound Edge during this**
23 **time period?**

24 A. Not even that formally sometimes. Sometimes it
25 was to double check metrics on some things and then I could

1 reconstruct it by hand in autoBound Edge.

2 **Q. What metrics were you looking at at Dave's during**
3 **this time period?**

4 A. The same metrics we had been using the whole time.
5 Obviously we were -- we then had updated population sets so
6 we knew what we were going to use at that time. But the
7 metrics generally did not change, especially after the
8 Davidson numbers had been confirmed. Or excuse me, that the
9 Davidson metric was going to be used. Same metrics
10 otherwise.

11 **Q. Okay. So I'm going to go through them with you.**
12 **During November 11 to November 15 were you looking at total**
13 **population on Dave's Redistricting?**

14 A. Correct. In terms of deviation numbers, yeah,
15 that's important.

16 **Q. Were you looking at voting-age population by race**
17 **numbers on Dave's redistricting?**

18 A. I believe we would have been. Correct.

19 **Q. Would you have been looking at citizen voting-age**
20 **population by race on Dave's Redistricting from November 11**
21 **to November 15, 2021?**

22 A. I believe we would have.

23 **Q. Okay. Would you have been looking at the**
24 **cumulative partisan score on Dave's Redistricting for a --**
25 **as a metric from November 11 to November 15, 2021?**

1 A. That would have been probably less of a metric we
2 were concerned about at that point in time because per
3 agreements between commissioners, the dates and numbers we
4 had to use, I do not believe that was ever available in
5 Dave's Redistricting.

6 **Q. You don't believe the Davidson number was --**

7 A. The Davidson number? I don't believe that was
8 available. At least at the time. I know they kind of
9 update it every now and then.

10 **Q. Was there anything else you were looking at?**

11 A. Not that I can recall.

12 **Q. Okay. And then can you read for me the name of**
13 **the attachment on this email from November 13, 2021?**

14 A. The attachment name is "Proposal Metrics 11-
15 13.xlsx".

16 **Q. Okay. When you sent attachments to Commissioner**
17 **Graves were these -- when you sent -- strike that. When you**
18 **sent metric attachments to Commissioner Graves via email**
19 **were you the one pulling the metric Excel from autoBound**
20 **Edge?**

21 **MS. GOLDMAN:** Objection. Asked and answered.

22 **THE WITNESS:** Most of the time it would have been
23 me. Yeah. There may have been circumstances where Paul had
24 sent me -- Paul Grave -- Paul Campos had sent me something.
25 Most of the time though I would assume if it was an

1 attachment sent to Paul Graves it likely was me pulling it
2 from autoBound Edge.

3 **BY MS. WAKNIN:**

4 Q. I'm going to introduce now as -- we're at Exhibit
5 7? Thank you. Plaintiff's going to represent that this is
6 the Excel file -- and Simone is going to pull it up -- that
7 we downloaded from this email attachment.

8 It says "Proposed Metrics 11-13.xl". I don't have
9 the -- this is how it was produced to us. This is a PDF. I
10 would ask that you just object to form on this document if
11 you have objections.

12 (Whereupon, Exhibit 7 was marked for
13 identification.)

14 **MS. GOLDMAN:** I object to this document and it's
15 authenticity. I object that it calls for speculation and
16 lack of foundation.

17 **BY MS. WAKNIN:**

18 Q. It was downloaded as a PDF. And you are viewing
19 the PDF. You can take a second when she's done marking the
20 exhibit number to take a look. Okay. Mr. Grose, can you
21 tell me when you're ready to -- when you've reviewed the
22 document?

23 A. Okay.

24 Q. Mr. Grose, can you read row one for me?

25 A. Row one. Current, Simms 11-12 and Graves 11-12.

1 Q. Is that referring to a map -- an April Simms's map
2 from November 12th?

3 MS. GOLDMAN: Objection. Calls for speculation.

4 BY MS. WAKNIN:

5 Q. You can answer.

6 A. It would seem so.

7 Q. Okay. And for Graves 11-12 would that be
8 referring to a Graves proposed map from November 12?

9 MS. GOLDMAN: Objection. Calls for speculation.

10 THE WITNESS: I believe so.

11 BY MS. WAKNIN:

12 Q. Could you read for me -- oh, you don't -- and
13 could you read column two for -- row two for me?

14 MS. GOLDMAN: Counsel, I'm going to object to
15 having him read on the record. You can do what you want
16 with your time. We're not going over time today.

17 THE WITNESS: Row two. District, R percentage.
18 District, Davidson 20. Abbreviated Davidson 20.
19 Abbreviated change. District, Davidson 20 percentage.
20 Abbreviated Davidson 20. It looks like Column J was not
21 fully expanded. There's another word there. And notes.

22 BY MS. WAKNIN:

23 Q. Can you read for me the -- for Graves 11-12 the
24 Davidson percentage for district 14?

25 A. District 14?

1 Q. Correct.

2 A. 57.75 percent.

3 Q. And can you read for me the district 15?

4 A. That would be 53.18 percent.

5 Q. Do you know which or do you have a belief as to
6 which district the 14th or 15th is a majority Latino
7 district -- a CVAP district?

8 MS. GOLDMAN: Objection as to form. Vague and
9 ambiguous.

10 BY MS. WAKNIN:

11 Q. You can answer.

12 A. Without looing at the map I couldn't -- I don't
13 want to make a guess.

14 Q. To the best of your ability which one do you think
15 it is?

16 MS. GOLDMAN: Objection. Asked and answered.

17 THE WITNESS: Without seeing the map I wouldn't be
18 able to tell.

19 BY MS. WAKNIN:

20 Q. In the previous -- strike that. Can you pull up
21 exhibit -- or can you grab Exhibit 5, please? Can you look
22 at Exhibit 5, please? Are you looking at Exhibit 5?

23 A. Yes.

24 Q. Okay. Was the numbering changed between
25 legislative districts 14 and 15 between 11-11 and 11 -- the

1 **11-11 proposal and the 11-12?**

2 **MS. GOLDMAN:** Objection. Vague. Calls for
3 speculation.

4 **THE WITNESS:** Can you repeat the question one more
5 time?

6 **BY MS. WAKNIN:**

7 **Q.** Did you change the district number -- the
8 legislative district numbering -- of legislative districts
9 14 and 15 between the 11-11 -- or Exhibit 5 map and the 11-
10 12 Graves' map that was from the proposed metrics on 11-13?

11 **MS. GOLDMAN:** Objection. Calls for speculation.

12 **THE WITNESS:** Again, I would have to see the
13 individual maps that these graphs correspond to. They do
14 not appear to be the same geographic districts, at least in
15 terms of the Davidson 20 performance metric.

16 **BY MS. WAKNIN:**

17 **Q.** For competitiveness it was, like, the number on
18 the range of a competitive district would be either plus
19 three or plus five; is that correct?

20 **MS. GOLDMAN:** Objection. Misstates the testimony.

21 **THE WITNESS:** It appears -- yeah. I can't exactly
22 recall what was considered competitive or not competitive,
23 but it was between the range of three to five points either
24 direction.

25 **BY MS. WAKNIN:**

1 **Q. All right. I'm going to move on from this**
2 **exhibit. You can put that away. I'd like to talk about the**
3 **last day of the redistricting -- of the deadline. I'd like**
4 **to talk about the deadline. That was on November 15, 2021;**
5 **is that correct?**

6 A. To the best of my recollection, yes; that's
7 correct.

8 **Q. Where were you physically on the day of November**
9 **15, 2021?**

10 A. The majority of the day we were at the -- I can't
11 recall the hotel name -- in Federal Way, Washington. Yeah.

12 **Q. Is Federal Way, Washington in Olympia?**

13 A. Federal Way is in -- no. It's its own city.

14 **Q. Oh, okay. And why were you all in Federal Way?**

15 A. It was an opportunity for the commissioners to
16 negotiate in person prior to the deadline.

17 **Q. How many days were you all in Federal Way?**

18 A. Well, at the time I lived in Federal Way roughly.
19 But in terms of redistricting business it would have been --
20 I want to guess two to three days at the hotel. I candidly
21 cannot remember specifically how many days it was.

22 **Q. Were you all in-person in the two to three days**
23 **leading up to the November 15 deadline?**

24 A. I know we had met face-to-face with Commissioner
25 Simms several days -- maybe a week prior to the deadline. I

1 candidly can't remember how many days we were at that
2 specific hotel though.

3 **Q. And where was Commissioner Graves on November 15,**
4 **2021?**

5 **MR. STOKESBARY:** Objection. Calls for
6 speculation.

7 **THE WITNESS:** He was at the hotel most of the day.
8 Yeah. I can't account for him every second clearly, but he
9 was at the hotel for most of the day.

10 **BY MS. WAKNIN:**

11 **Q. Who were you with on November 15, 2021?**

12 A. All commissioners were present for most of the day
13 as I recall it. Most of the staff. So myself, Paul Campos,
14 Osta Davis, and Ali O'Neil were present there as well. I
15 believe one, maybe two of the commission staffers were
16 there. And then the Commission Chair, Sarah Augustine, was
17 there as well.

18 **Q. What was Sarah Augustine's role in -- on the**
19 **Washington Redistricting Commission?**

20 A. Right. So as the chair -- I suppose chairs could
21 theoretically take different kinds of roles. But what she
22 really wanted to do was help mediate in times of
23 disagreement on, you know, certain decisions to be made on
24 the map, helping find consensus. That's mostly what she was
25 able to offer to the commissioners.

1 **MR. HUGHES:** I'm going to object to lack of
2 foundation now that I've heard the answer.

3 **THE REPORTER:** I'm sorry. Would you mind
4 repeating?

5 **MR. HUGHES:** I'm going to object. Lack of
6 foundation. Now that I've heard the answer.

7 **BY MS. WAKNIN:**

8 **Q. Did you work with Sarah Augustine at all during**
9 **your time with the Redistricting Commission?**

10 A. Not really directly working with her. She would
11 generally speak to the commissioners while in groups. The
12 staff didn't work super directly with her. And if we worked
13 with anyone directly on the Commission it would have been
14 talking to technical staff for the most part. At least, I
15 can attest to myself mostly technical assistance and the GIS
16 staffing.

17 **Q. What was the general atmosphere like on November**
18 **15, 2021 with respect to how -- redistricting?**

19 **MS. GOLDMAN:** Objection. Vague.

20 **THE WITNESS:** I think there was concern for a
21 period through negotiations that maps ultimately wouldn't
22 get agreed upon. But I think -- well, I can't give a
23 general mood.

24 I think everyone had a different perspective on
25 what was happening, what would happen if maps weren't

1 passed. Yeah. I couldn't give a general mood, but
2 certainly I think maybe tense would be fair.

3 **BY MS. WAKNIN:**

4 **Q. And what was the outstanding points of**
5 **disagreement that you knew about on November 15 for why**
6 **people were worried that the maps wouldn't get approved on**
7 **time?**

8 A. As I recall even that late in time there were
9 still multiple areas of the map that were of concern to all
10 the commissioners. Yeah. I couldn't point to one specific
11 one. There still seemed to be a divide in quite a few areas
12 at that point in time.

13 **Q. Okay. Were one of the areas that there is a**
14 **divide was about legislative districts 14 and 15?**

15 A. I believe for Commissioner Walkinshaw that was
16 still a problem at that point in time. It had not seemed
17 that Commissioner Simms, in my recollection, was -- that
18 that was so. But we were coming closer with her on that
19 particular issue as I recall it.

20 And I can't -- obviously Commissioner Walkinshaw
21 and the rest of the commissioners came to an agreement at
22 some point. I can't say specifically when that was. But I
23 do believe, at least for Commissioner Walkinshaw, that was
24 still a concern on the 15th.

25 **Q. And was Commissioner Walkinshaw's concern that you**

1 **know about having to do with Latinos in the Yakima Valley**
2 **being able to elect candidates of choice?**

3 A. I believe his concern was, in my opinion, mostly
4 political at that point in time.

5 **Q. Why did you think it was mostly political?**

6 A. There were, again, in my opinion, many different
7 iterations of the 14th and 15th -- from the last day many
8 versions of that that we'd seen over time. Different CVAP
9 Hispanic majority districts had been proposed for either 14
10 or 15.

11 How those were configured, he was relatively
12 adamant that the version UCLA had come up with was -- it
13 seemed at certain points that that was certainly the only
14 version that he was willing to accept. Again, I can't
15 recall when he would have come around on those
16 conversations. I think that answers your question.

17 **Q. Are you specifically speaking about the versions**
18 **of the map that Dr. Barreto had drawn?**

19 A. That is correct.

20 **Q. Okay. When you're discussing with the 15th and**
21 **14th legislative district and you discussed there were many**
22 **different versions of maps proposed with varying degrees of**
23 **majority Latino CVAP is it your understanding that a**
24 **district just had to be majority Latino CVAP to satisfy**
25 **Commissioner Walkinshaw?**

1 **MS. GOLDMAN:** Objection. Calls for speculation.

2 **THE WITNESS:** No. There were -- gosh. I'm really
3 trying to dig deep here because we had gone through many
4 versions of this on that day alone. No; the political
5 performance seemed to be paramount to him than even an
6 increased Hispanic CVAP.

7 Again, that CVAP number being used at that point
8 in time too was also an estimate of a 29 ACS. So we knew
9 that that was likely undercounting pretty severely Hispanic
10 populations in the district. So no; I think primarily his
11 concern was the Democratic performance of the district.
12 Yeah. In my opinion.

13 **BY MS. WAKNIN:**

14 **Q. And was it -- did Commissioner Graves have**
15 **conversations with you about whether a majority CVAP**
16 **Hispanic district in the Yakima Valley would be satisfactory**
17 **to Commissioner Simms?**

18 **MS. GOLDMAN:** Commissioner Graves asking about
19 Commissioner Simms?

20 **MS. WAKNIN:** Yes.

21 **MS. GOLDMAN:** Objection. Vague and calls for
22 speculation and lack of foundation.

23 **THE WITNESS:** Recalling the conversations between
24 those two that I was present for, it had seemed that
25 Commissioner Simms was not -- for her there were also other

1 majority-minority districts that she was also concerned
2 about, including the 15th and 14th as well.

3 In my opinion it felt like she thought we had made
4 a good-faith effort to bridge the gap on a lot of those
5 districts, including the 15th. Again, these were vastly
6 evolving conversations that had been going on for many days.

7 But that's my recollection. As the process had
8 moved on we had come closer with Commissioner Simms on that
9 particular district. Or I should say those particular
10 districts.

11 **BY MS. WAKNIN:**

12 **Q. How much time physically did you spend with**
13 **Commissioner Graves on the day of November 15, 2021?**

14 **A. Most of the day.**

15 **Q. Would you say majority of the day?**

16 **MS. GOLDMAN:** Objection. Asked and answered.

17 **THE WITNESS:** I would say most of the day, yeah,
18 to my recollection.

19 **BY MS. WAKNIN:**

20 **Q. Were you with Commissioner Graves when he would --**
21 **strike that. Did Commissioner Graves have meetings with**
22 **other commissioners on November 15, 2021?**

23 **MS. GOLDMAN:** Objection. Calls for speculation.

24 **THE WITNESS:** To the best of my knowledge, yes.

25 **BY MS. WAKNIN:**

1 **Q. Did you go with Commissioner Graves to those**
2 **meetings?**

3 A. I was present for some of them. Not all of them.
4 I know there were conversations I wasn't privy to.

5 **Q. Can you list for me the conversations you were**
6 **privy to on that day with Commissioner Graves?**

7 A. We were in and out of negotiations basically all
8 day, so there were a lot of specific conversations. I
9 couldn't point to -- I couldn't give you a timeline of every
10 specific one.

11 **Q. Were you with Commissioner Graves when he met with**
12 **-- strike that. Were you with Commissioner Graves -- did**
13 **Commissioner Graves have meetings with Commissioner**
14 **Walkinshaw on November 15, 2021 that you were present for?**

15 A. Yes. One that I can remember.

16 **Q. Where was that meeting?**

17 A. There was a big -- it was at the hotel. A big
18 ballroom there.

19 **Q. The meeting occurred in a ballroom at a hotel?**

20 A. Conference room, ballroom, yeah. Whatever you
21 want to call it. Yeah. A large room.

22 **Q. What did the meeting room look like?**

23 A. Pretty empty. Small tables set up. It was
24 myself, Ali O'Neil, Commissioner Walkinshaw, Commissioner
25 Graves. I believe Sarah Augustine was there as well. I

1 believe so.

2 **Q. Okay. Anyone else there?**

3 A. For that meeting I believe that is it.

4 **Q. When did that meeting occur?**

5 A. November 15th I believe. We were also there the
6 day before. Right and around final negotiations.

7 **Q. I mean time of day. When was the time of day that**
8 **that meeting occurred?**

9 A. I could not say. I hadn't seen sunlight in a long
10 time at that point.

11 **Q. Did you have a final proposal -- strike that. Did**
12 **Commissioner Graves have a final proposal at this meeting**
13 **with Commissioner Walkinshaw that you were sitting with --**
14 **that you were attending?**

15 A. Not that I can recall.

16 **Q. Okay. Were you taking notes for Commissioner**
17 **Graves at that meeting?**

18 A. Not that I can recall at that point in time.

19 **Q. Was anyone taking notes at that meeting of the**
20 **folks that you listed?**

21 A. I cannot recall.

22 **Q. At the meeting was there any conversation**
23 **regarding legislative district 14 and 15?**

24 A. I believe there was.

25 **Q. What was the conversation about?**

1 A. Commissioner Walkinshaw I believe at this point
2 was still pretty adamant about getting the very specific
3 district that he wanted for 14, 15. As I recall he
4 indicated that he -- to the best of my recollection either
5 he wouldn't vote for a map otherwise at that point in time
6 or that he was willing to take it to the court alternatively
7 and sue over those districts. I remember it not being very
8 productive. I'll put it that way.

9 **Q. I guess what was the general atmosphere like**
10 **during that meeting?**

11 A. It was cordial but very to-the-point.

12 **Q. When you say take it do the court do you mean the**
13 **Washington Supreme Court?**

14 A. He was, in my opinion, indicating that either he
15 was willing to not vote for the map or that he was willing
16 to litigate after passing a map. I think at that point in
17 time he was likely -- speculating here -- weighing the pros
18 and cons of not voting for a map and his other Democratic
19 colleague not voting for a map, not having a map passed by
20 the commissioners and having the Supreme Court draw the map
21 versus the likelihood of succeeding in a lawsuit such as
22 this.

23 So I think he was weighing those pros and cons.
24 Again, I'm speculating. Didn't hear this from him or anyone
25 else. But this would be my best guess as what he would have

1 been thinking at the time.

2 **Q. Did you speak at all during this meeting?**

3 A. Not that I can recall. Negotiations were staff
4 was there to listen to and understand if any decisions were
5 ultimately agreed upon to then be able to have that
6 knowledge moving into map drawing.

7 **Q. Did anyone speak at meetings at the -- at negotiation**
8 **meetings that were not commissioners to your knowledge?**

9 **MS. GOLDMAN:** And you're asking about any
10 negotiations? Not just this meeting.

11 **BY MS. WAKNIN:**

12 **Q. Any negotiations that you were privy to.**

13 A. Generally no. I can't recall unless we were asked
14 a very specific question by a commissioner to answer.
15 Generally no.

16 **Q. At that meeting that you were -- that you attended**
17 **with Commissioner Graves with Commissioner Walkinshaw in the**
18 **ballroom was Commissioner Graves offering an alternative to**
19 **Commissioner Walkinshaw at that meeting regarding the**
20 **legislative districts 14 and 15?**

21 A. I can't recall if an alternative was offered at
22 that meeting specifically. I can't recall.

23 **Q. Were there any alternatives that Commissioner**
24 **Graves offered to Commissioner Walkinshaw on the day of**
25 **November 15th to see if Commissioner Walkinshaw would sign**

1 on to a map?

2 A. I can't attest for that specific day what was or
3 was not proposed or what alternatives were proposed. Excuse
4 me. As I mentioned earlier, I think Commissioner Graves was
5 open to holistic different approaches on the map, including
6 the district that Commissioner Walkinshaw was pretty adamant
7 about or a district very similar to that. But any
8 alternatives did not seem to appease him as I recall.

9 Again, I don't know if this was at that specific
10 meeting discussed. But as I recall general negotiations at
11 the time went on. Like I said, there were times where
12 Commissioner Walkinshaw's preferred district was discussed
13 as incorporated with other things Commissioner Graves wanted
14 to see. But ultimately that was not landed on.

15 Q. Okay. Were you aware if Commissioner Graves was
16 open to a holistic approach that would allow legislative
17 district 15 or 14 to perform for Democratic candidates?

18 MS. GOLDMAN: Objection. Vague.

19 THE WITNESS: Can you repeat that question?

20 BY MS. WAKNIN:

21 Q. Were you aware if Commissioner Graves was open to
22 a holistic approach that would allow legislative district 14
23 or 15 to perform for Democratic candidates?

24 MS. GOLDMAN: Same objection.

25 THE WITNESS: By perform you mean win the

1 district?

2 **BY MS. WAKNIN:**

3 **Q. How would you define perform for perform?**

4 **MR. HUGHES:** Objection. Calls for a legal
5 conclusion.

6 **THE WITNESS:** Have an opportunity at winning the
7 district.

8 **BY MS. WAKNIN:**

9 **Q. Okay. So again, were you aware if Commissioner**
10 **Graves was open to an approach that would allow legislative**
11 **districts 14 or 15 to perform for Democratic candidates?**

12 **MS. GOLDMAN:** Using the definition he just gave
13 you of perform?

14 **MS. WAKNIN:** Yes.

15 **BY MS. WAKNIN:**

16 **Q. Using your definition of perform.**

17 **MS. GOLDMAN:** Objection. Calls for speculation.

18 **THE WITNESS:** I believe so. Yep. Yeah.

19 **BY MS. WAKNIN:**

20 **Q. Did he propose that map to Commissioner**
21 **Walkinshaw?**

22 **A.** I don't know that it was ever a drawn-out
23 proposal, but I do believe there were conversations around
24 adopting precisely what Commissioner Walkinshaw had wanted
25 in that region with other changes that Commissioner Graves

1 wanted to see as well as a sort of token of good faith. But
2 if I recall correctly Commissioner Walkinshaw was not
3 interested in that.

4 **Q. What were the other changes that Commissioner**
5 **Graves would be willing to see for exchange for the**
6 **Walkinshaw district?**

7 **MS. GOLDMAN:** Objection as to form.

8 **BY MS. WAKNIN:**

9 **Q. You can answer.**

10 A. Yeah. I couldn't recall specifically. And I
11 don't know that a map was every produced to kind of blend
12 all those concepts. There may have been, but I cannot
13 recall.

14 **Q. Did you ever draw a map for Commissioner Graves**
15 **where the majority Hispanic CVAP district would perform for**
16 **Democratic candidates using the definition of perform that**
17 **you used?**

18 A. Yes; I believe I would have drawn maps to that
19 effect.

20 **Q. Was that map ever made public?**

21 A. Well, the only public map we ever released was the
22 proposal map that was released with the other three
23 commissioners' proposed maps. Yeah.

24 **Q. And that map, the original map -- strike that.**
25 **Was the map that you had drawn that had a majority Hispanic**

1 CVAP district that would perform for Democratic candidates

2 -- was that ever circulated to other commissioners?

3 A. I don't believe so. Yeah.

4 Q. What --

5 A. And again, I believe I'd prepared a map -- maybe
6 several maps like that. But I don't know if it was
7 circulated or not.

8 Q. Why did Commissioner Graves tell you to prepare a
9 map that would have a majority Hispanic CVAP district that
10 would perform for Democratic candidates?

11 MS. GOLDMAN: Objection. Calls for speculation.

12 BY MS. WAKNIN:

13 Q. You can answer.

14 A. Can you repeat the question one more time?

15 MS. WAKNIN: Can you read back the question,
16 please?

17 THE REPORTER: Of course.

18 (WHEREUPON, the reporter played the record as
19 requested.)

20 THE WITNESS: I can only make an assumption. I
21 would assume he would be interested in looking into
22 alternatives to find consensus.

23 BY MS. WAKNIN:

24 Q. Besides the Commissioner Walkinshaw meeting that
25 you had on November 15th that you -- with Commissioner

1 **Graves, what were the other meetings that you had on**
2 **November 15th with Commissioner Graves?**

3 A. There were a number of meetings that day. Many
4 meetings. I couldn't say specifically.

5 Q. I want to go back to the maps that you had drawn.
6 Did Commissioner Graves ever ask you to draw a Hispanic CVAP
7 majority district that would perform for Latino candidates
8 of choice using your definition of performance?

9 MS. GOLDMAN: Objection. Asked and answered.

10 THE WITNESS: Yeah. Again, I genuinely cannot
11 recall. I'm assuming that was probably something he had
12 asked me to do. I believe I produced maps on that. Again,
13 this was a very fast-moving period of time. So finding ways
14 to find consensus in a very narrow amount of time, I'm sure
15 we exhausted many options.

16 BY MS. WAKNIN:

17 Q. So what happened in the afternoon of November 15,
18 2021 with respect to the negotiations with the Redistricting
19 Commission?

20 MR. HUGHES: Objection. Vague.

21 THE WITNESS: Yeah. I could not recount minute-
22 by-minute what had happened that afternoon. There was a
23 distinct time period that felt like the commissioners would
24 not come to a consensus.

25 In terms of what I recall as the afternoon I think

1 that was -- that took up quite a bit of valuable time at
2 that point in time where the commissioners couldn't --
3 largely speaking -- because it felt as though consensus was
4 not going to get reached. But there may have been other
5 conversations going on between the commissioners that I was
6 not aware of.

7 **BY MS. WAKNIN:**

8 **Q. And in the afternoon into evening who else were**
9 **you -- or who were you with during that time period when you**
10 **were in Federal Way?**

11 A. Mostly around Commissioner Fain, Paul Campos, and
12 obviously Commissioner Graves. But the other commissioners
13 were present at the hotel. I was generally with the names I
14 just mentioned though.

15 **Q. Did you have a meeting room in the hotel where you**
16 **would meet with Commissioner Fain, Graves, and Paul Campos?**

17 A. Yeah. We had one big meeting room, although we
18 used it for not just meetings between Commissioner Fain and
19 Graves and myself and Paul Campos. I know Commissioner
20 Simms had come in to do some negotiation with Commissioner
21 Graves in one of the rooms. Yeah. There were multiple --
22 some smaller, some larger -- meeting rooms.

23 **Q. What were you primarily -- what was your -- strike**
24 **that. What were you primarily doing in the afternoon and**
25 **evening on November 15, 2021 with respect to redistricting?**

1 A. For the most part, afternoon, again, felt like
2 consensus was not going to get reached. Upon the news that
3 consensus had been reached, which came as, candidly, a
4 surprise to myself at the time, we got to work pretty
5 immediately once we were given exact parameters of what the
6 maps need to look like.

7 We got working right away. As you can imagine,
8 drawing a map from -- certainly not scratch, but certainly
9 having to make changes on the fly to exact parameters that
10 were agreed upon just takes time. So myself and Osta and
11 Ali and Paul got to work immediately as soon as we had those
12 parameters outlined.

13 **Q. And when was consensus reached on November 15?**

14 A. I couldn't even give a specific time. It was
15 later in the day. Yeah.

16 **Q. Would you say, like, late evening, early evening,**
17 **late evening?**

18 **MS. GOLDMAN:** Objection. Asked and answered.

19 **THE WITNESS:** Maybe later in the day. Early
20 evening maybe. Yeah.

21 **BY MS. WAKNIN:**

22 **Q. Was there a document about -- that laid out the**
23 **specific parameters that were agreed upon for the**
24 **legislative district map?**

25 A. Not that I could recall. They were mostly working

1 off agreements made up to that point. I think there were --
2 to the best of my recollection -- two major changes made in
3 the final agreement. There may have been more, but I recall
4 there being two major changes that we needed to incorporate
5 that were likely going to take some time.

6 **Q. What were the two major changes in the legislative**
7 **district map?**

8 A. There was a change to the 44th legislative
9 district if I recall correctly and to the 28th legislative
10 district in that very final agreement that I'm assuming must
11 have helped bridge the gap.

12 **Q. What map were you all working off of to make the**
13 **edits for the agreed-upon map? Legislative district map.**

14 A. Sorry. Say that one more time.

15 **Q. So what was the map that you had agreed upon using**
16 **to be the one where you would make the edits for the 44th**
17 **and the 28th district?**

18 A. Right. So there were -- we were kind of
19 piecemealing maps together, which is part of the reason it
20 took so much time to get the final map produced because we
21 had to reconcile different portions of different maps and
22 essentially put them together.

23 Which essentially ended up largely starting
24 mapping from scrap at that point, which is a pretty tedious
25 process. But at that time, yeah, we'd spent so much time

1 with the maps all the staff had a very specific idea of what
2 we all had agreed upon and put that together.

3 **Q. Okay. Whose legislative district 15 did you use**
4 **for the final approved map?**

5 **MR. HUGHES:** Objection. Vague.

6 **MS. GOLDMAN:** Join the objection.

7 **THE WITNESS:** Largely Commissioner Graves.

8 **BY MS. WAKNIN:**

9 **Q. Why did you all use his legislative district 15**
10 **for the final approved map?**

11 **MS. GOLDMAN:** Objection. Calls for speculation.

12 **THE WITNESS:** Yeah. I --

13 **MR. HUGHES:** And lack of foundation.

14 **THE WITNESS:** I can't speculate as to why all the
15 commissioners agreed and voted on that specific district. I
16 believe it fit the necessary -- I speculate it fit the needs
17 of all the commissioners.

18 **BY MS. WAKNIN:**

19 **Q. And was the legislative 15 district map -- the**
20 **legislative 15 -- strike that. Was Paul Graves' legislative**
21 **15 that was used for the final approved map -- was that a**
22 **district that you -- a legislative district 15 that you had**
23 **drawn that had majority Latino CVAP that would also perform**
24 **for Latino candidates of choice?**

25 **A.** It was a very 50-50 district. I mean, literally

1 right on the border of 50-50. Performance, again, could be
2 somewhat subjective depending on what metrics you use.

3 **MS. WAKNIN:** I'm going to introduce -- is this
4 Exhibit 8?

5 **THE REPORTER:** Yes.
6 (Whereupon, Exhibit 8 was marked for
7 identification.)

8 **BY MS. WAKNIN:**

9 **Q.** Please take a look at that document. Ms. Leeper
10 is going to upload the document to the Zoom.

11 **MS. GOLDMAN:** And Counsel, before you ask any
12 further questions can I check in on your anticipated close?
13 I do believe other counsel may have questions and this
14 witness has a very long trip to make tonight as you know.
15 And you have seven hours of deposition time.

16 **MS. WAKNIN:** I expect to go on for maybe 30 more
17 minutes.

18 **MS. GOLDMAN:** I think you're going to have a
19 problem with time. I'll let you guys figure that out.

20 **MR. STOKESBARY:** This is Drew Stokesbary, counsel
21 for interveners. We would like about 15 to 30 minutes out
22 of the seven hours. That seems reasonable to us.

23 **MR. HUGHES:** I think we could do with about a half
24 an hour. So how much time do we have left on the record?

25 **THE REPORTER:** You're currently at five hours and

1 43 minutes.

2 MS. WAKNIN: Okay.

3 BY MS. WAKNIN:

4 Q. Did you take a look at that document?

5 A. I have.

6 Q. Okay. Can you identify this document, Exhibit 8,
7 for me?

8 A. This is an email that I sent to Paul Graves and
9 Evan Ridley.

10 Q. Okay. And the subject line is "Final Map
11 Metrics"; is that correct?

12 A. That is correct.

13 Q. And there is an attachment that says "Final Map
14 Metrics". It's an Excel document. Is that correct?

15 A. That is correct.

16 Q. Okay. I'm going to pull up Exhibit 9.

17 (Whereupon, Exhibit 9 was marked for
18 identification.)

19 MS. WAKNIN: Oh. Thank you. Can you upload that
20 for me?

21 MS. LEEPER: I think I just did. Did it not send?

22 MS. WAKNIN: Oh, yeah. You did. No. It did not
23 send. That's proposed metrics. It's not the --

24 MS. LEEPER: Oh. Excuse me.

25 MS. WAKNIN: I appreciate it.

1 BY MS. WAKNIN:

2 Q. I would like to represent that Plaintiff's Counsel
3 downloaded the Excel and it is provided to you in PDF format
4 from that email.

5 MS. GOLDMAN: And I'm going to object as to
6 authenticity and that the questions regarding Exhibit 9 call
7 for speculation and lack of foundation.

8 BY MS. WAKNIN:

9 Q. Anton, does this look like the map metrics that
10 you pulled before for Commissioner Graves?

11 MS. GOLDMAN: Objection. Vague.

12 THE WITNESS: It does look that way.

13 BY MS. WAKNIN:

14 Q. Okay. Why does it look that way?

15 A. These look directly out of autoBound Edge, similar
16 formatting.

17 Q. Can you read for me for legislative district 15
18 the Davidson 20 percent number? Just --

19 A. For the -- which column?

20 Q. Oh, it's not on there. So for Column A it says
21 2021 commission map. Down at 15, the Davidson 20 race --
22 does it say 53.32 percent?

23 A. In Column B for district 15 I would read 53.32
24 percent under the Davidson 20 percent metric.

25 Q. What would that mean?

1 A. That would mean Duane Davidson's result within the
2 boundary lines of the new 15th legislative district would
3 have been 53.32 percent.

4 Q. And what party does Mr. Davidson belong to?

5 MS. GOLDMAN: Objection. Asked and answered.

6 BY MS. WAKNIN:

7 Q. You can answer.

8 A. He ran as a Republican candidate for an incumbent
9 Republican candidate for State Treasurer.

10 MS. WAKNIN: Okay. I'm going to -- we can get rid
11 of the -- I'm done with this exhibit. I'd like to just ask
12 for a short five-minute break. Are we off the record?

13 THE REPORTER: And with that we are off the
14 record. The time is 4:35 p.m.

15 (WHEREUPON, a recess was taken.)

16 THE REPORTER: We are back on the record. The
17 time is 4:42 p.m.

18 BY MS. WAKNIN:

19 Q. All right. Anton, I have only a few more
20 questions left for you. So I want to circle back to LD 15
21 and the approved -- and the final approved map. When did
22 you finalize the Graves LD 15 that was largely incorporated
23 into the final map?

24 A. I can't say for certain exactly what time that was
25 decided upon. Obviously it's the commissioners -- they were

1 having those conversations -- final conversations -- largely
2 outside of staff purview.

3 Q. So I'm actually specifically thinking -- speaking
4 about when you were drawing districts. So you had mentioned
5 that Graves's legislative district 15 was -- strike that.
6 The legislative district 15 that was largely incorporated
7 into the final map -- was that one that you had drawn?

8 MS. GOLDMAN: Objection. Asked and answered.

9 THE WITNESS: Largely, yes. There may have been
10 small changes made near the end.

11 BY MS. WAKNIN:

12 Q. When did you finalize that one that was the base
13 for the one that was -- for the LD 15 that was then
14 incorporated into the final map?

15 MS. GOLDMAN: Objection. Misstates the testimony.
16 Vague and ambiguous.

17 THE WITNESS: I could not say for certain.

18 BY MS. WAKNIN:

19 Q. Do you know when that proposal for that
20 legislative district 15 that was largely incorporated into
21 the final map by -- was sent over to the other
22 commissioners?

23 A. When it was sent over I can't say for certain. In
24 the days leading up to the end of negotiations.

25 Q. Okay. So before November 15; is that correct?

1 A. I believe so. I can't say for certain though on
2 timeline.

3 Q. Okay. And I just have one more question for you.
4 You mentioned that Commissioner Simms was concerned with a
5 number of majority-minority districts. What districts
6 exactly were you referring to that Commissioner Simms was
7 concerned about?

8 A. To the best of my recollection, to some extent all
9 of them; right? I'm thinking off the top of my head 29, 30,
10 47, 33, 48, 44. I may have missed a few in there. But
11 yeah.

12 Q. And what was Commissioner's main concern with
13 these districts?

14 MS. GOLDMAN: Objection. Calls for speculation.

15 THE WITNESS: Yeah. I couldn't say main concern.
16 Certainly ensuring that they remained or became majority-
17 minority districts. Was one of, I'd say, the most important
18 things to her.

19 MS. WAKNIN: I pass the witness. Andrew, do you
20 want me to move?

21 MR. HUGHES: No. Does this work for you, Mr.
22 Grose, if I'm --

23 THE WITNESS: This is perfect. Yep.

24 MS. WAKNIN: Okay.

25 MR. HUGHES: Okay.

1 **EXAMINATION**

2 **BY MR. HUGHES:**

3 Q. I'd like to start pretty close to where you left
4 off. Looking back at Exhibit 9, do you have that in front
5 of you?

6 A. I do now.

7 Q. And I believe you said that Exhibit 9 was an
8 analysis that you had prepared or you had downloaded of how
9 -- of performance in the enacted LD 15 -- enacted
10 legislative map. Is that right?

11 MS. GOLDMAN: Objection. Misstates the testimony.

12 **BY MR. HUGHES:**

13 Q. Let me -- sorry. Can I strike that question?

14 MS. GOLDMAN: And can I ask, Counsel, if he can
15 have Exhibit 8 in front of him too, which is apparently what
16 it's appended to?

17 MR. HUGHES: Oh, yeah. By all means.

18 THE WITNESS: That's what I was --

19 MS. GOLDMAN: Thank you.

20 MR. HUGHES: Yeah.

21 MS. GOLDMAN: Thank you.

22 **BY MR. HUGHES:**

23 Q. So let me ask a slightly better question. So this
24 is the performance analysis for the Treasurer's race and the
25 map that was adopted by the Commission; correct?

1 **MS. GOLDMAN:** Objection. Calls for speculation,
2 lack of foundation, authenticity.

3 **BY MR. HUGHES:**

4 **Q.** As far as you know.

5 **A.** As far as I know, yes.

6 **Q.** Okay. And the Davidson numbers are meant to
7 measure performance; correct?

8 **A.** They were the single agreed-upon metric. Every --
9 any given metric has its pros and cons and are not entirely
10 indicative of future or past results --

11 **Q.** Right.

12 **A.** -- in such district. But this was the agreed-
13 upon metric for -- yes.

14 **Q.** That the Commission agreed upon to measure
15 performance --

16 **A.** That's correct.

17 **Q.** Correct? Okay. So I'm going to pull up a --
18 share my screen with you and I'm going to pull up a website.
19 And sorry I don't have this in a hard copy, but it is a
20 website. Do you see that right now?

21 **A.** I do see that; yes.

22 **Q.** Do you recognize this website?

23 **A.** I do.

24 **THE REPORTER:** And my apologies for the
25 interruption. Are you intending to make this an exhibit for

1 the transcript?

2 **MR. HUGHES:** No.

3 **THE REPORTER:** Thank you.

4 **BY MR. HUGHES:**

5 **Q. What is this website?**

6 A. This is the Washington State Secretary of State's
7 website looking at the August 2, 2022 -- the recent primary
8 results.

9 **Q. Okay. So looking at Exhibit 9 do you see row 21**
10 **is 15? LD 15.**

11 A. For the new map?

12 **Q. For the new map. Yeah.**

13 A. Correct.

14 **Q. All my questions are about the new map.**

15 A. Okay.

16 **Q. Do you know whether there's a contested election**
17 **in any LD 15 race this cycle?**

18 A. I do not believe so.

19 **Q. Okay. Would you like me to confirm that for you?**

20 A. Please do.

21 **Q. Okay. So I'll click on State Senator. Does this**
22 **appear to be a contested election?**

23 A. It does not appear that way.

24 **Q. Does there appear to be one candidate running?**

25 A. One candidate running, obviously receiving write-

1 in votes.

2 **Q. And that's Nikki Torres?**

3 A. Nikki Torres running, yes. But there were also
4 write-in votes as well. So one candidate officially on the
5 ballot.

6 **Q. Sure. And then I'm going to look at the State Rep**
7 **Position 1. Does this appear to be a contested election?**

8 A. It does not.

9 **Q. Look at State Rep Position 2. Does this appear to**
10 **be a contested election?**

11 A. It does not.

12 **Q. Okay. So what comes next in this row in this --**
13 **sorry -- in this table after district 15? Which district?**

14 A. 26.

15 **Q. Okay. So I'm going to click on 26. State**
16 **Senator. And what percentage does the Democratic candidate**
17 **get in the primary results in this election? State Senate**
18 **for 26.**

19 A. Appears to be 51.52. It's a little blurry though.

20 **Q. Okay. So according to this map -- sorry --**
21 **according to this analysis that you've prepared, what**
22 **percentage would Duane Davidson have gotten in LD 26?**

23 A. On the new maps? 53.01.

24 **Q. So looking at -- comparing the election results on**
25 **your screen versus those on 26 does it appear that Democrats**

1 **did better in LD 26 than was predicted using the Treasurer**
2 **numbers?**

3 A. That is correct.

4 **Q. And let's look at LD 26 State Rep 1.**

5 **MS. WAKNIN:** Andrew, objection. Are you using
6 primary election results?

7 **MR. HUGHES:** I am. Yes.

8 **MS. WAKNIN:** To compare to a general election?

9 **MR. HUGHES:** You're welcome to ask some follow-up
10 questions if you'd like. What's your objection?

11 **MS. WAKNIN:** I'm going to strike my objection.

12 **MR. HUGHES:** Okay.

13 **BY MR. HUGHES:**

14 **Q. So looking at State Rep Position 1, does this**
15 **appear that Democrats did better here than was predicted**
16 **based on your analysis?**

17 A. Correct.

18 **Q. Looking at State Rep Position 2, same question.**

19 A. Appears the Republican in this race would have
20 slightly overperformed the Davidson 20 metric.

21 **Q. Okay. So in two of the races Democrats did**
22 **slightly -- or did better and then in one of the race**
23 **Republican did slightly better --**

24 A. Correct.

25 **Q. -- in 26. Okay. I'd like to move on to LD 10.**

1 That's the next LD on the list; correct?

2 A. Correct.

3 Q. Okay.

4 A. The next one down. Yeah.

5 Q. And I'm going to click on State Rep Position 1.

6 Based on this -- these primary results, does it appear that
7 the Democratic candidate did better here than was predicted
8 by the analysis you performed?

9 A. Correct.

10 Q. And looking at State Rep Position 2, same
11 question.

12 A. Correct.

13 Q. I'm going to skip over 42 because a lot of people
14 were running and I don't want to make you do too much math
15 on the fly. But I'm going to go to LD 5 next. You see
16 that's right below 42?

17 A. Correct.

18 Q. And there's a little bit of math here but same
19 question. Did Democrats do better or worse here than you
20 predicted -- than would have been predicted by the analysis
21 you performed?

22 A. This is LD 5. Yes; Democrats would have
23 overperformed the Davidson 20 metric.

24 Q. And let's look at State Rep Position 2. Same
25 question.

1 A. Correct. Democrats would have overperformed
2 compared to the Davidson 20 metric.

3 Q. And I don't want to belabor the point, but let me
4 go down to just one more. Let's look at 24. That's next
5 after 5; correct?

6 A. Correct.

7 Q. So looking at the first one, did Democrats do
8 better or worse here than what was predicted by this
9 Davidson analysis?

10 A. Democrats would have overperformed the Davidson 20
11 metric.

12 Q. And looking at -- we're at 24 Position 2. Same
13 question.

14 A. I can't read the percentage for Steven Barringer
15 here. Oh.

16 Q. Sorry. I'm going to make you do some math here.
17 I apologize.

18 MS. GOLDMAN: Mine's clearer. He can see.

19 THE WITNESS: Oh, I see the -- okay. Right.
20 Democrats would have overperformed the Davidson 20 metric.

21 BY MR. HUGHES:

22 Q. Okay. Are you familiar with the term "red wave"?

23 A. I am familiar with that term.

24 Q. Have you heard folks describe -- have you ever
25 heard folks predict that the 2022 election in Washington was

1 **likely to be a red wave?**

2 **MS. WAKNIN:** Objection. Speculation.

3 **BY MR. HUGHES:**

4 **Q. I asked if you've heard it.**

5 **A.** Certainly many in the media have brought that
6 topic up many times over the last, you know, year roughly.

7 **Q. Were you personally anticipating Republicans would**
8 **do better in 2022 statewide than they did in 2020?**

9 **A.** I would have generally anticipated so.

10 **Q. And why is that?**

11 **A.** Typically, you know, a lot of fundamental reasons
12 for that. Much study on mid-term elections would tell you
13 over the last hundred years. But typically the federal
14 level -- both executive, both branches -- or sorry, both
15 Chambers of Congress being held by one party, typically that
16 party would perform much more poorly in the following mid-
17 term.

18 **Q. So would you say that -- is it fair to say that**
19 **Democratic candidates were facing a headwind in the 2022**
20 **elections?**

21 **A.** Correct.

22 **Q. Okay. Does it appear, based on these results, as**
23 **if the Davidson-Pellicciotti metric underestimated**
24 **Democratic performance fairly significantly?**

25 **A.** In many cases, yes.

1 Q. Okay.

2 A. And to be clear, you said underestimated?

3 Q. Underestimated --

4 A. Underestimated.

5 Q. -- Democratic performance.

6 A. Yes.

7 Q. Okay. So if a -- well, strike that. I'd like to
8 take you back to the November 15th -- the meeting that
9 Commissioner Graves had with Commissioner Walkinshaw. Do
10 you remember being asked about that?

11 A. Earlier today?

12 Q. Yes.

13 A. Yes.

14 Q. In that meeting do you recall Commissioner
15 Walkinshaw indicating that he had spoken with anyone who
16 wasn't in the room about the maps?

17 A. Do not know if I can recall Commissioner
18 Walkinshaw doing that. I do remember Commissioner Simms --
19 and I believe Commissioner Walkinshaw -- spent much time
20 that day discussing the maps with other stakeholders on the
21 phone. I was not privy to any of these conversations. But
22 that's what I had heard that day.

23 Q. Do you recall anyone mentioning them speaking with
24 Dr. Matt Barreto about the maps as they were being revised?

25 A. I don't know for sure.

1 Q. You don't know for sure.

2 A. No.

3 Q. Do you have any sort of memory of that?

4 MS. GOLDMAN: Objection. Asked and answered.

5 THE WITNESS: Yeah. They talked to -- from what I
6 understand, the speaker that evening, other members of both
7 the House and the Senate. I don't know for sure about Dr.
8 Barreto though.

9 BY MR. HUGHES:

10 Q. And by speaker do you mean Speaker of the House?

11 A. Correct.

12 Q. Okay. So Laura Jenkins --

13 A. Correct.

14 Q. Okay.

15 A. Yeah.

16 Q. I want to take a look back at Exhibit 1. Do you
17 have that in front of you?

18 A. I do have that in front of me; yes.

19 Q. And I believe you described this -- I think you
20 used the term partisan wish list. Do you remember that?

21 A. I do.

22 Q. So is it fair to think of this map as an opening
23 salvo in negotiation?

24 A. Particularly what we can see here, certainly
25 making the concession here if we simply take a look at the

1 numbers. And I, again, I cannot say for certain. I'm
2 assuming this would be total population we're looking at
3 here, yeah, where we can see this is certainly a majority-
4 minority district on total population.

5 It was always something that Commissioner Graves
6 was aware of, was something that we knew there would be
7 eventually some form of compromise on. And again, I believe
8 you'd have to go look at this specific comments on this map.

9 But I do believe there were a much greater number
10 of majority-minority districts on this whole map than there
11 were on the current map. That's something that we were,
12 well, certainly --

13 **Q. Yeah.**

14 **A. -- certainly a focus for him.**

15 **Q. So I want to be clear. I'm not specifically**
16 **asking about these districts. And to be clear, this is only**
17 **a portion of the map; correct?**

18 **A. Correct.**

19 **Q. So you don't have the whole map in front of you.**

20 **A. I do not.**

21 **Q. So maybe we could just put the map to the side and**
22 **let me ask it this way. When Commissioner Graves first**
23 **publicly released the map in September 2021, a map that,**
24 **again, not to -- that you referred to as a partisan wish**
25 **list, is it fair to think of that as sort of here is our**

1 original negotiating position and we're going to use this as
2 a sort of anchor going forward in negotiations to try to
3 reach common ground?

4 A. Yeah. I should have revised that comment.
5 Partisan wish list. I think I later referred to it as kind
6 of signaling, which I think is a much better way to describe
7 that there are certain things that we would like to achieve
8 in a final map.

9 There are certain, you know, partisan things,
10 certain community of interest things, certain majority-
11 minority district focused issues that kind of signal to the
12 other commissioners, you know, where we might stand on those
13 specific issues. What we would like to get, where we're
14 willing to compromise, things of that nature.

15 Q. That's totally fair. And I want to be clear, I
16 didn't mean partisan wish list in a derogatory nature. I
17 didn't interpret you to mean it that way.

18 A. Yeah.

19 Q. But did you understand that all the four corners,
20 all the four commissioners, their public maps, similarly
21 reflected a sort of, you know, this sort of opening move,
22 this sort of salvo?

23 A. Correct. Yeah. I think they were all similar to
24 more or less degrees in some circumstances. Signals as to
25 things that they --

1 Q. Signal.

2 A. -- were willing to do, willing to compromise on,
3 things they really wanted, et cetera.

4 Q. Okay. Commissioner Graves. As far as you
5 understand, Commissioner Graves didn't anticipate the
6 September 21 map would become the final map lock stock.

7 A. No. I don't think he was ever under that
8 impression. I'm speculating, but I feel confident that he
9 did not.

10 Q. All right. I want to show you a couple of
11 documents that you haven't previously taken a look at.

12 MR. HUGHES: I'm going to start with -- is this
13 Exhibit 10?

14 THE REPORTER: Yes.

15 MR. HUGHES: All right. Mark that as --

16 THE REPORTER: Yep. I will.

17 MR. HUGHES: I apologize. I only have one for you
18 to share.

19 (Whereupon, Exhibit 10 was marked for
20 identification.)

21 BY MR. HUGHES:

22 Q. And let me know when you've had a chance to review
23 that document.

24 MS. GOLDMAN: He doesn't have it yet.

25 MS. WAKNIN: And did you have a document to upload

1 to the Zoom?

2 **MR. HUGHES:** Oh, yeah. I should; shouldn't I?
3 Give me just a second. Huh. I've never done this before.

4 **MS. LEEPER:** It's in the chat.

5 **MR. HUGHES:** Yeah.

6 **MS. LEEPER:** There's a little document thing.

7 **MR. HUGHES:** Oh, that's -- oh my goodness. I'm so
8 sorry.

9 **MS. GOLDMAN:** Do you want to email it to me and I
10 can try and upload it?

11 **MR. HUGHES:** No. You know what? I think now I
12 figured it out. Sorry. Our systems are a bit of a mess.
13 Oh, no. Don't do that.

14 **MS. WAKNIN:** Maybe we could just continue, Andrew.

15 **MR. HUGHES:** Yeah. If you all are okay continuing
16 I'm okay. I can tell you the Bates No. if that would help
17 anyone.

18 **MS. WAKNIN:** Yeah; that would help.

19 **MR. HUGHES:** It's Bates No. 48276.1. I don't
20 really know where that comes from.

21 **MS. LEEPER:** I think if you could send it to us
22 after the deposition -- we didn't receive Bates Nos. with
23 any of the documents produced.

24 **MR. HUGHES:** Okay.

25 **MS. LEEPER:** So I don't think that will help us.

1 **MR. HUGHES:** I'm sorry. Let me see if -- I'm just
2 going to -- I do apologize for this. I think Christine will
3 be able to do that. But in the meantime I -- the
4 document's, frankly, not all that important.

5 **BY MR. HUGHES:**

6 **Q.** Do you have the document in front of you, this
7 super-important exhibit?

8 **A.** I have.

9 **Q.** Okay. So I actually want to ask you just about
10 the top email. Can you tell me what that email is?

11 **A.** This is an email from Paul Graves to April Simms.
12 Cc'd on the email was myself, Osta Davis, and Dominique
13 Meyers.

14 **Q.** And in it Paul Graves writes -- Commissioner
15 Graves writes, "We made the CVAP district the 15th rather
16 than the 14th for ease of incumbents." Do you see that?

17 **A.** I do.

18 **Q.** And what do you understand that to mean?

19 **MS. LEEPER:** Objection. Calls for speculation.

20 **MS. GOLDMAN:** I'm just going to object to having
21 two lawyers --

22 **MS. LEEPER:** I realized the moment that I did it.
23 I apologize. I will not do that again.

24 **MS. GOLDMAN:** Okay.

25 **MS. WAKNIN:** I'll object to speculation.

1 **THE WITNESS:** Can you ask the question again,
2 please, sir?

3 **BY MR. HUGHES:**

4 **Q. Yeah. What did you understand Commissioner Graves**
5 **to be saying there?**

6 **MS. WAKNIN:** Same objection. Speculation.

7 **THE WITNESS:** As he mentioned, you know, we were
8 moving pretty quickly. This had not even come as a thought
9 today. But this was how this decision was made. But I'm
10 assuming it had to do with the fact that Representative
11 Defoe was going to be districted out of his district.

12 Which seemed pretty inevitable as we kind of moved
13 along and wanted to make sure we had the CVAP numbers that
14 the commissioners needed to get agreement -- to get to
15 agreement, excuse me. So that being said, I'm assuming that
16 is part of what he's saying here. But it's an assumption.

17 **BY MR. HUGHES:**

18 **Q. Do you recall having any discussion with**
19 **Commissioner Graves about how this would affect turnout in**
20 **elections?**

21 **MS. GOLDMAN:** And Counsel, can you just be clear
22 on what you mean by "this"?

23 **MR. HUGHES:** This renumbering of the district.

24 **MS. GOLDMAN:** Thank you.

25 **THE WITNESS:** Oh, the renumbering of the district?

1 No. Turnout was not a conversation that we had had.

2 **BY MR. HUGHES:**

3 **Q. Do you recall --**

4 A. That I can recall.

5 **Q. Do you recall anyone discussing turnout in**
6 **connection with the numbering of what here is called the**
7 **CVAP district?**

8 A. I do not remember that being a point brought up
9 during negotiations as I can recall. And I believe it was
10 mentioned in the -- not that I can recall.

11 **Q. Sorry. You believe it was mentioned in what?**

12 A. I believe it was mentioned in the Barreto analyses
13 that were released but not between the commissioners. I
14 don't recall any conversations about that.

15 **Q. What do you remember about this issue in the**
16 **Barreto report? This issue of district numbering.**

17 A. Oh, that the Barreto analyses -- asked,
18 recommended, requested, whatever the analyses said -- that
19 renumbering the districts would provide better opportunity
20 for Democratic candidates to win the district.

21 **Q. And I think we heard earlier that the Barreto**
22 **analysis was released sometime in late October; is that**
23 **right?**

24 A. I cannot recall the date it came out.

25 **Q. Okay. Do you know whether it was before or after**

1 **November 13 when this email was sent?**

2 A. In regards to the Barreto analyses?

3 **Q. Yeah. Had you gotten the Barreto analysis before**
4 **or after November 13th when this email --**

5 A. It certainly would have been prior to this. I
6 can't say exactly when, but certainly prior.

7 **Q. So having seen this issue discussed in the Barreto**
8 **report there was no discussion amongst you and/or**
9 **Commissioner Graves about how renumbering the district might**
10 **affect Latino turnout?**

11 A. I don't recall that being a conversation.

12 **Q. Did you have any concerns about how renumbering**
13 **the district would affect turnout?**

14 A. The only thought I personally had on the manner
15 was that the majority of the previous now LD 15 was going to
16 be part of the new LD 15 as the finalized version was being
17 created.

18 And, like in most districts, we don't just switch
19 the numbers if the majority of the same population is in a
20 district. I think that was probably part of the thought
21 too. At least, I can attest to that from my perspective.

22 **Q. So fair to say then that your concern was**
23 **primarily keeping incumbents in their districts?**

24 A. Holistically on the map that certainly is
25 something I think all commissioners had interest in doing.

1 **Q.** Right. But I'm talking specifically with the
2 numbering of LD 14 and 15. For you the numbering -- the
3 primary consideration was maintaining continuity of
4 numbering for incumbents.

5 **MS. GOLDMAN:** Objection. Misstates the testimony.

6 **THE WITNESS:** Yeah. Not just, I suppose, for
7 incumbents but for the population that lives there as well.

8 **MR. HUGHES:** Got it.

9 **THE WITNESS:** Yeah. The constituents.

10 **BY MR. HUGHES:**

11 **Q.** So you didn't want someone who was previously in
12 the 15th to be in the 14th for sort of that compelling
13 reason.

14 **A.** Naturally that, you know, individuals are going to
15 get moved. That's part of the redistricting process. But I
16 believe the vast majority of the new 15th district still
17 contains tens of thousands -- I can't put a number on it --
18 of former 15th district constituents as well. So --

19 **Q.** Sure.

20 **A.** -- arbitrarily switching the numbers just, you
21 know, that didn't occur with any other district on the map
22 either.

23 **Q.** Got it. Okay. I'd like to move on to a final
24 exhibit.

25 **MR. HUGHES:** Erica, this is 49058. If you could

1 upload that, please. And this will be Exhibit 11, I
2 believe.

3 **(Whereupon, Exhibit 11 was marked for**
4 **identification.)**

5 **THE REPORTER:** Correct.

6 **MS. GOLDMAN:** Is this all one? Oh. It is one.

7 **MR. HUGHES:** It's all one; yeah. This feels a
8 little light. That's not five pages that you have.

9 **BY MR. HUGHES:**

10 **Q. And let me know when you've had a chance to**
11 **review.**

12 **A.** Okay.

13 **Q. So Mr. Grose, what are we looking at here? What**
14 **is this document?**

15 **A.** This appears to be beginning with in this chain an
16 email from the reporter, Melissa Santos, who was with Cross
17 Cut at the time, to Commissioner Graves and Evan, our
18 communications individual, essentially asking for comment on
19 the analyses put out from Mr. Barreto.

20 It looks like Evan Ridley had then sent this to me
21 -- this analysis. I can't tell if the comment -- it looks
22 like the comment was probably, yes, forwarded. So then I
23 sent -- it was a Senate Democrat link, so I can't say
24 specifically what was on that link. I'm assuming that was
25 -- it was the Barreto analyses. It appears to be.

1 Paul Graves then emailed back. Received that
2 there October 21st at 5:55 p.m. It appears that I had then
3 began redrawing these districts. I think some comments
4 about my concerns with the district that Mr. Barreto
5 proposed.

6 **Q. Can I actually stop you there? Because you've**
7 **gotten to the part I want to ask about. It's that middle**
8 **email. This is an email from you dated October 22, 2021,**
9 **8:16 a.m.; is that right?**

10 A. October 22, 2021 at 8:16 a.m. Correct.

11 **Q. And you write that these districts that,**
12 **admittedly, you don't have in front of you right now are not**
13 **geographically compact as stated in the VRA. What was the**
14 **basis for that statement?**

15 A. Again, I'd be able to help more if I had the map
16 in front of me that I was commenting on. Gosh, 11, 12,
17 well, 10, 11 months ago. As I recall, the map, from the top
18 of my memory, there were very large protrusions from the
19 district.

20 Basically just grabbing populations along a
21 highway, ignoring the surrounding communities made it
22 absolutely not compact. But this was happening in about
23 three separate areas of the map.

24 You would not see another district like this
25 proposed because it simply is objectively not compact

1 district in any way, shape, or form. To the best of my
2 recollection that's what I would have made by -- or what I
3 would have meant by that comment.

4 **Q. You mention in the next sentence -- and here I'm**
5 **quoting you -- "There are parts of these districts you**
6 **couldn't even reach without driving a substantial distance**
7 **outside of the district." Did I read that right?**

8 A. Correct.

9 **Q. Is that significant to you?**

10 A. Typically how we would think of contiguity and not
11 just from a holistic district perspective, and ensuring the
12 district is not split in multiple ways between other
13 districts, but ensuring -- I think it also shows a certain
14 amount of community within a district that you can pretty
15 easily access the district by driving.

16 As, again, I don't have the maps in front of me,
17 as I recall there were numerous places where you had to
18 drive an hour, maybe two hours, outside the district to
19 reach other parts of the district. There were no connecting
20 roads to that, which is a pretty good indicator that these
21 communities are not homogenous in many ways. Yeah. I think
22 that sums that up.

23 **Q. So without telling me about any conversations you**
24 **might have had with an attorney, did anyone ever tell you or**
25 **do you ever remember discussing with anyone this**

1 **relationship between drivability and contiguity?**

2 A. Only with -- excuse me, it's getting late -- Paul
3 Campos. That was, I think, one of the few individuals I
4 would have ever spoken to about this. And apparently I
5 brought it up to Paul as well in this email.

6 Q. Okay. And now I'll try to move quickly here. I
7 understand that it's getting late. So just I'll read the
8 next two sentences and I'll ask you to confirm that I've
9 read them right. "Not to mention requires the splitting of
10 numerous cities, counties, and other communities of interest
11 through the process. Wouldn't that make these racial
12 gerrymanders?" Did I read that right?

13 A. You did.

14 Q. What did you mean by "racial gerrymanders"?

15 A. Well, I'm not a judge so I cannot give a specific
16 legal definition. But --

17 Q. I'm just asking what you meant by the term.

18 A. Yeah. As I understand it, a district that you
19 could not explain in any way but by the basis of race. And
20 that was the predominant if not the only reasoning for
21 drawing a district in that way.

22 Q. At this point do you recall whether you'd done any
23 analysis on what constitutes a racial gerrymander?

24 A. No formal analysis. Not that I can recall.

25 Q. Do you recall doing any analysis of whether racial

1 **gerrymanders were sometimes permissible?**

2 **MS. GOLDMAN:** I'm going to instruct you here that
3 you are not to answer to the degree that any information was
4 provided to you by counsel for the Commission or for the
5 legislature. To the degree that you formed an opinion based
6 on any other information you may answer the question.

7 **THE WITNESS:** Based on some of the other case law
8 -- again, I'm not a lawyer, so --

9 **MR. HUGHES:** Fair.

10 **THE WITNESS:** -- I cannot maybe interpret that to
11 the level others can. But that being said, that there have
12 been previous case law demonstrating that districts drawn
13 solely on that basis were not constitutional. And it
14 appeared to me that this arguably could certainly fall under
15 that characterization.

16 **BY MR. HUGHES:**

17 **Q.** Okay. And you move on to say in the next
18 sentence, "Because I have no idea how you could justify
19 these districts any other way." Do you see that?

20 **A.** I do.

21 **Q.** What about the VRA? Do you think the VRA would
22 justify -- again, not asking about counsels -- do you think
23 -- would the VRA justify drawing a district in which race is
24 taken into consideration as you understand it?

25 **MS. GOLDMAN:** Again, I object to the degree it

1 calls for a legal conclusion.

2 **THE WITNESS:** Yeah. Can you repeat the question
3 one more time?

4 **BY MR. HUGHES:**

5 **Q.** Yeah. So you say -- would the VRA justify, in
6 your understanding, using -- taking race into consideration
7 in drawing district lines?

8 **MS. GOLDMAN:** And I'm going to again object on the
9 basis it calls for a legal conclusion. You may answer.

10 **THE WITNESS:** Well, certainly race is something
11 considered holistically throughout districts on the map.
12 Whether the VRA is applicable in this situation I could not
13 say in particular. There's a specific set of circumstances
14 in any case in which the VRA may apply. I can't say for
15 certain whether it does or it doesn't in this case.

16 **BY MR. HUGHES:**

17 **Q.** So when you were in the process of drawing maps
18 did you think -- did you believe that you were allowed to
19 take race into consideration or did you think that was
20 verboten?

21 **A.** Oh --

22 **MS. GOLDMAN:** And again I'm going to counsel you
23 that to the degree your view of this is based on the advice
24 of counsel I'm instructing you not to answer on the basis of
25 the attorney-client privilege. If you have any other source

1 for the answer you may answer.

2 **THE WITNESS:** I believed we could.

3 **BY MR. HUGHES:**

4 Q. I'd like to move up the chain to Paul Graves's
5 response to you. And he says "we'll litigate this issue, if
6 necessary, in court". Did I read that right? I understand
7 I'm not reading the whole sentence, but did I read that
8 right?

9 A. That portion of the sentence; correct.

10 Q. Well, let me just read the whole sentence. He
11 responds to you, "Yes that (sic) would. But we'll litigate
12 this issue, if necessary, in court, not in newspapers and
13 press releases." Is that the entirety of the email?

14 A. That specific one, yes.

15 Q. So is it your understanding that Commissioner
16 Graves was anticipating litigation based on the maps you
17 guys were drawing? Or at least believed it was possible.

18 A. Yes. Yeah. I believe there was a common thought
19 that this was somewhat of a likely scenario regardless of
20 what final map was passed.

21 Q. What sort of litigation were you anticipating?

22 A. Similar to this.

23 Q. So litigation on the Voting Rights Act?

24 A. Potentially. Litigation regarding the 14th or
25 15th district; yeah.

1 Q. Okay.

2 A. Yeah.

3 Q. And did you understand that litigation was likely
4 if the Commission didn't adopt a majority Hispanic CVAP
5 district?

6 MS. GOLDMAN: Objection. Calls for speculation.
7 And again, I object to the degree it calls for a legal
8 conclusion or analysis. You may answer.

9 THE WITNESS: I can't speculate exactly what
10 Commissioner Graves had thought at the time.

11 BY MR. HUGHES:

12 Q. Well, I'm asking about your belief at the time.

13 A. My belief at the time --

14 MS. GOLDMAN: Same objections and same -- yeah.
15 Go ahead.

16 THE WITNESS: Okay. I think regardless -- had we
17 adopted almost exactly the map I think we would still be
18 sitting here most likely.

19 BY MR. HUGHES:

20 Q. Sure. Was it your understanding that litigation
21 -- did you believe that litigation was likely if you did not
22 draw a district that performed for Latino voters? Let me
23 ask that -- a better question. Was it your understanding --
24 did you believe that litigation was likely if the Commission
25 did not draw -- did not adopt maps that performed for Latino

1 **voters?**

2 A. Again, I think litigation was likely in any
3 scenario.

4 **Q. Fair.**

5 A. Yeah.

6 **Q. Using your definition of performance, which I**
7 **think Ms. Waknin asked you about earlier, did you believe**
8 **that as agreed to by the Commission LD 15 performs for**
9 **Hispanic voters?**

10 A. I certainly believe it can be a competitive
11 district as was adopted. Yes.

12 **Q. Is that a yes or a no or something else?**

13 **MS. GOLDMAN:** Objection. Asked and answered.

14 **THE WITNESS:** I believe it can be -- it can
15 perform for Hispanic voters; yes.

16 **BY MR. HUGHES:**

17 **Q. And slightly different question. Do you believe**
18 **that LD 15 as enacted by the legislature performs for**
19 **Hispanic voters?**

20 A. Yes.

21 **MR. HUGHES:** I want to just briefly ask you -- and
22 Drew, I'm doing my best to get through this quickly. I
23 appreciate you hanging on, man.

24 **MR. STOKESBARY:** Absolutely.

25 **THE REPORTER:** My apologies. Mr. Stokesbary, what

1 was that comment?

2 **MR. STOKESBARY:** I'm sorry. I should have kept my
3 mouth shut. I just said absolutely.

4 **THE REPORTER:** Thank you.

5 **MR. HUGHES:** Sorry, Madam Court Reporter.

6 **BY MR. HUGHES:**

7 **Q. Back to mister -- Dr. Barreto's analysis. Was**
8 **that the only statistical or demographic analysis you're**
9 **aware of that was reviewed by the entire Commission about**
10 **the Yakima Valley area?**

11 A. As far as I know, yes.

12 **Q. Were you aware of any effort being made to**
13 **investigate or corroborate Dr. Barreto's conclusions?**

14 A. There may have been discussions by Commission
15 staff that that might be warranted. I feel like I faintly
16 recall something like that being discussed for a period of
17 time, but I can't say for certain.

18 **Q. Do you know whether anything came of those**
19 **discussions?**

20 A. I don't believe so.

21 **Q. Was seeing Dr. Barreto's presentation the first**
22 **time you recall the issue of a VRA district in Yakima**
23 **arising?**

24 A. I don't believe so. I think the maps that frankly
25 all the commissioners released for their proposed maps

1 demonstrated a willingness to try to do their best to comply
2 VRA wise.

3 Again, I don't think any of them could say for
4 certain what is or isn't required. It's in some ways such a
5 legal question it's complicated to answer. So again, I
6 can't speak for any of them individually, how they felt
7 about that.

8 **Q. That's fair. I'm not asking about the**
9 **commissioners. What I'm really asking is when did you,**
10 **Anton Grose, first come to understand that the Commission**
11 **might be required or might end up drawing a majority**
12 **Hispanic district in the Yakima Valley area because of the**
13 **Voting Rights Act?**

14 A. Purely because of the Voting Rights Act? I
15 believe it was likely -- I believe that decision was made
16 regardless of the Voting Rights Act. I believe the
17 commissioner simply thought it was the right thing to do.

18 **Q. Okay.**

19 A. So I can't speculate on purely because of the
20 Voting Rights Act that's why they did what they did.

21 **Q. Fair.**

22 A. I think though that was on principle something
23 most if not all the commissioners likely agreed upon. Yeah.

24 **Q. Okay. Agreed upon coming into the process?**

25 A. Coming in; yeah. Having spent a little bit of

1 time in the process, understanding --

2 **Q. Right. Sure. And what do you -- as far as you**
3 **understand it, what was that view based on? The need to**
4 **create a majority Hispanic district in the Yakima Valley**
5 **area.**

6 **A.** I, again, cannot speak for any of the commissions
7 here. I had the sense that they felt that it's part of
8 their mandate, you know, when applicable, where it makes
9 sense given the other weighted factors, right, of things to
10 consider.

11 Well, not weighted. Excuse me. The non-weighted
12 factors that we have to consider when redistricting is given
13 by State statute. I think most of them if not all of them
14 were compelled to do it where it made sense under those --
15 under that guidance.

16 **Q. Is it your understanding -- and I'm not asking**
17 **about any conversations with Counsel -- is it your**
18 **understanding that the legislative map that was enacted**
19 **complied with the VRA?**

20 **MS. GOLDMAN:** Objection. Calls for a legal
21 conclusion.

22 **THE WITNESS:** Yeah. I cannot say for certain.
23 **BY MR. HUGHES:**

24 **Q. Okay. Have you spoken with Commissioner Graves**
25 **about whether the enacted legislative map complies with the**

1 **VRA?**

2 A. I don't know if him and I have had that
3 conversation. Not that I can recall.

4 Q. Okay. And when you say you're not certain, are
5 you not certain because you are not sure whether the VRA
6 even applies to LD 15 or are you not certain because you're
7 not certain whether the map complies with the VRA? Does
8 that make sense?

9 MS. GOLDMAN: Object to the degree it calls for a
10 legal conclusion and vague.

11 MS. WAKNIN: Objection. Compound.

12 THE WITNESS: I'll answer the first question.

13 MR. HUGHES: Yeah.

14 THE WITNESS: Yes; I'm sure that it fully applies
15 in this situation. And can you restate the second question?

16 **BY MR. HUGHES:**

17 Q. No. Don't worry about it.

18 A. Okay.

19 Q. Strike that as we say in the biz. All right. I'm
20 going to -- okay. Three more questions. You are aware, I
21 take it, that at least two commissioners believed it was
22 necessary to create a majority Hispanic CVAP district that
23 would perform for Latino voters in order to comply with the
24 VRA; are you not?

25 A. That is --

1 **MS. GOLDMAN:** Objection. Calls for speculation.

2 **THE WITNESS:** Aware that there were two -- at
3 least two commissioners that believed -- can you restart?
4 Say that question one more time.

5 **BY MR. HUGHES:**

6 **Q.** It was a long question.

7 **A.** Yeah.

8 **Q.** I apologize. Are you aware that at least two
9 commissioners believed it was necessary -- is it your
10 understanding that at least two commissioners believed it
11 was necessary to create a majority Hispanic CVAP district
12 that performed for Latino voters in the Yakima Valley in
13 order to comply with the Voting Rights Act?

14 **MS. GOLDMAN:** Objection. Calls for speculation
15 and to the degree it calls for a legal conclusion I object.

16 **THE WITNESS:** It appeared that way.

17 **BY MR. HUGHES:**

18 **Q.** Based on what did it appear that way?

19 **A.** Statements, I think, made by commissioners I think
20 would indicate that.

21 **Q.** And what did you understand to be the basis for
22 this view by at least two commissioners that the VRA
23 required this?

24 **A.** I believe Commissioner Walkinshaw, if memory
25 serves me correct, he'd always wanted a similar district. I

1 cannot speak for Commissioner Simms. She was holistically
2 looking at majority-minority districts across the map.

3 **Q. Sure.**

4 **A.** And that one was a concern, but so were plenty of
5 other ones whereas Commissioner Walkinshaw was pretty solely
6 focused on one. Yeah.

7 **Q. Did you understand why Commissioner Walkinshaw --**
8 **do you have an understanding of why Commissioner Walkinshaw**
9 **thought this was so important?**

10 **MS. GOLDMAN:** Objection. Calls for speculation.

11 **THE WITNESS:** So purely speculative. I believe
12 Commissioner Walkinshaw saw this as an opportunity to
13 essentially get what he wanted through either the proper
14 redistricting process or through the courts.

15 **BY MR. HUGHES:**

16 **Q. And what does that mean "get what he wanted"?**

17 **A.** To get a Democratic district. Yeah.

18 **MR. HUGHES:** I have no further questions. Thanks.
19 Thank you so much.

20 **EXAMINATION**

21 **BY MR. STOKESBARY:**

22 **Q. Good not really morning anymore or afternoon.**
23 **Good evening, Mr. Grose. I am Drew Stokesbary. I represent**
24 **a collection of three individuals who have intervened as**
25 **intervener defendants in this lawsuit.**

1 I have a couple questions for you. Maybe five or
2 ten. I am hoping that we can go quick. All of them relate
3 to topics that came up earlier, so if I'm mischaracterizing
4 anything please don't hesitate to correct me if your lawyer
5 doesn't do so first.

6 One thing that came up early on was you were
7 talking about looking at districts' total population versus
8 voting-age population versus citizen voting-age population.
9 What was your understanding in terms of how legislative and
10 congressional apportionment -- what legislative and
11 congressional apportionment is based on? What of those
12 metrics or a different metric?

13 **MS. GOLDMAN:** And I'm going to object to the
14 degree it calls for a legal conclusion or to -- and to the
15 degree that the answer to that information came -- to that
16 question came from information that was provided to you by
17 counsel for the legislature or the Commission I am
18 instructing you not to answer. Anything else you may
19 answer.

20 **THE WITNESS:** Total population.

21 **BY MR. STOKESBARY:**

22 **Q.** Thanks. Another thing that you mentioned a couple
23 times was receiving public comment regarding the Yakima --
24 well, you mentioned tribal reservations in general.

25 You also mentioned the Yakima reservation

1 specifically. And I believe at one point you said that it
2 was a priority of the Yakima nation to be preserved in one
3 legislative district. Did I get that right?

4 A. It is my -- if memory serves me correct, yes, that
5 was a big point of public comment. Holistically. Not just
6 for the Yakima tribe but for other tribes as well.

7 Q. And did the Yakima Indian nation in particular get
8 placed entirely within one legislative district under the
9 enacted map?

10 A. It did.

11 Q. To the extent of your knowledge was the Yakima
12 tribe happy with that outcome?

13 A. I believe I read comments to that effect, but I
14 cannot say for certain.

15 Q. Okay. And do you happen to know, you know, in the
16 -- it's now been, gosh, eight, nine months or so since the
17 maps were enacted. Do you happen to know if that continues
18 to be their position or not?

19 A. I can't say for certain.

20 Q. Okay. Yeah. No problem. Another topic that has
21 come up a lot today is the Yakima Valley. How would you
22 define the Yakima Valley?

23 A. The Yakima Valley is a collection of small
24 communities ranging from East Yakima down through -- I
25 believe it's Highway 82. Somebody here will remember for

1 me. Through Highway 82.

2 A collection of small communities very densely
3 both Hispanic communities like Toppenish, Sunnyside. I'm
4 missing one of the major ones there. Like you said, it's
5 been a while since I had to look at these maps. Going all
6 the way into Benton County pretty much down to Prosser, the
7 south end. It's a very Latino-heavy community. That's how
8 I would -- yeah.

9 Q. But your description would sort of end at about
10 Prosser and it wouldn't include any of the tri-cities like
11 Pasco, Kennewick, or Richland not in the Yakima Valley as
12 it's sort of commonly understood by --

13 A. That's how I understood it. Yeah.

14 Q. If you look at Exhibit 1, which I understand is
15 not a complete map of the state and I don't even have a
16 digital copy in front of me, but I think it includes the
17 entire 15th district that was part of Commissioner Graves's
18 September public proposal. Does it look to you like the
19 tri-cities is included in the proposed 15th district in that
20 map?

21 A. No. The tri-cities largely in this map are
22 contained within the 8th and the 16th district. Although it
23 does come along the outskirts of the tri-cities. More rural
24 areas.

25 Q. Based on your understanding and recollection do

1 **you know why that decision was made for this particular**
2 **proposal?**

3 A. As I've stated earlier, clear there were a lot of
4 maps that we had drawn throughout this process, so I
5 couldn't say specifically why it was. I could make a guess
6 as to this specific proposal being wholly isolated within
7 two counties achieving not splitting up the tri-cities any
8 further. And likely maintaining the Yakima reservation.

9 Q. Okay. Can you think of anything, as you were
10 going around the state and in your previous experience, can
11 you think of anything that Yakima and the tri-cities have in
12 common?

13 A. Other than the fact that they're both on the east
14 side of the state, I think they are two fairly distinct
15 communities. Certainly both have Hispanic populations.
16 Many parts of the east side do.

17 Q. Okay. Thanks. And similar question with regard
18 to the Yakima reservation and the Yakima Indian nation and
19 the tri-cities. Can you think of anything the Yakima nation
20 and the tri-cities have in common?

21 A. In my opinion I would see those as two distinct
22 communities.

23 Q. Okay. Thanks. Another topic that came up a
24 couple times was this notion of competitiveness. And my
25 recollection is that you indicated that having competitive

1 districts was a priority of Commissioner Graves.

2 A. Yes. That was a priority of his.

3 Q. Based on your understanding of the Constitution
4 and other statutory legal obligations do you think that
5 there was a legal component to that or not?

6 MS. GOLDMAN: Objection. Calls for a legal
7 conclusion and vague and ambiguous.

8 BY MR. STOKESBARY:

9 Q. Strike that last question. Mr. Grose, are you
10 aware that the Constitution -- the State Constitution --
11 prohibits the Commission from drawing maps that favor one
12 party or another?

13 MS. GOLDMAN: Objection to the degree it calls for
14 a legal conclusion. You can answer.

15 THE WITNESS: Yes. I had kind of forgotten that
16 part today. But yes.

17 BY MR. STOKESBARY:

18 Q. And based on your recollection and knowledge and
19 your communications with Commissioner Graves would you say
20 that Commissioner Graves made competitiveness a priority at
21 least in part because of that constitutional requirement?

22 A. That's conjecture, but I would believe so. Yeah.

23 Q. Okay. Thank you. Going back to community input
24 but speaking more broadly than just the Yakima reservation.
25 Thinking about all the community input you received in

1 central Washington, Yakima Valley, tri-cities, speaking
2 pretty broadly.

3 I think you used the phrase lots of community
4 input. Do you recall either hearing public comment at a
5 commission meeting or seeing any written comments that
6 suggested folks providing the comment felt that their
7 current legislators were not responsive to the needs of
8 themselves or their community?

9 A. I do not remember any public comments to that
10 effect isolated specifically to the greater Yakima Valley,
11 tri-cities area. No; I don't recall any of that.

12 Q. Okay. Thank you. Okay. Moving on a little bit
13 more. The presentation by Dr. Barreto came up a couple
14 times. You mentioned that you received the presentation.
15 Do you mean -- did you receive a live presentation from him
16 or somebody he was with? Or when you say you got the
17 presentation, do you mean you just saw the slide deck?

18 A. Saw the slide deck.

19 Q. Okay. Did you see any of the data underlying the
20 conclusions or just what's on the PowerPoint PDF is all you
21 ever saw?

22 A. To the extent that I remember just the slide deck.

23 Q. Do you know anything about the UCLA Voting Rights
24 Project?

25 A. Not much.

1 Q. Based on your, you know, what knowledge you do
2 have and based on the contents of the report you saw, did
3 they appear to be more of an academic research-oriented
4 institution or more of a special interest group?

5 A. The only piece of information -- I do not recall
6 ever really looking up the organization in itself. So
7 that's hard to say. I did briefly see Dr. Barreto's Twitter
8 account, which would lead me to believe the latter of what
9 you suggested.

10 Q. So --

11 A. But that's about the extent of my knowledge on
12 that.

13 Q. So it appeared to be more advocacy than an
14 academic interest in this.

15 A. If Dr. Barreto's private views are reflective of
16 his public work then I would have concerns about the
17 efficacy of the study.

18 Q. Okay. Another topic that came up was your
19 experience. You mentioned that you were the former
20 political director for the State Republican party and you
21 had experience working on campaigns. Have you worked on any
22 campaigns in some capacity or another in central Washington?

23 A. Sorry. I didn't get the tail end of that.

24 Q. Have you worked on any campaigns in central
25 Washington?

1 A. Central Washington? Coordinated with -- hard to
2 say. Obviously in that role you're in some way, shape, or
3 form connected with every campaign in terms of, you know,
4 providing data down to walking apps or field staff, things
5 like that. In some form or fashion I did. I would have to
6 go back and look.

7 Q. Okay. To your recollection, to the extent you
8 recall working on any campaigns in central Washington, do
9 you recall any racial appeals being made during those
10 campaigns? Whether by the campaign, the candidate, the
11 candidate supporters.

12 A. Not that I can recall. Most of the time on foot I
13 spent there would have been during 2018. No; nothing.
14 Nothing like that that I can recall.

15 Q. Okay. Thanks. I also want to -- if you can pull
16 up Exhibit 9. And feel free to pull up Exhibit 8, which I
17 think is what is what Exhibit 9 was attached to. And Andrew
18 asked a similar line of questions to what I'm going to ask.
19 But I would like to draw your attention to Columns E and F
20 of Exhibit 9.

21 A. Sorry. Let me find No. 8 here. I'm getting lost.

22 MS. GOLDMAN: It's the November 22nd email.

23 THE WITNESS: Do you have a copy of it?

24 MS. GOLDMAN: You can't use mine.

25 THE WITNESS: Oh, I can't use yours. Oh, is it

1 here? No; it's not. It might be under one of the
2 paperclips.

3 **MS. GOLDMAN:** Okay, Mr. Stokesbary. He has
4 Exhibit 8 and Exhibit 9 in front of him.

5 **MR. STOKESBARY:** Okay. Thank you.

6 **BY MR. STOKESBARY:**

7 **Q.** So looking on Exhibit 9 at Columns E and F, if I
8 recall Column E is just particular letters like district and
9 then it's labeling what is in Column F, which is under the
10 maps that existed -- that were adopted in 2011 which would
11 have existed during the 2020 election. That is the
12 percentage vote that went to Duane Davidson in the Treasury
13 race; correct?

14 **A.** Within those district lines. Yes; that's correct.

15 **Q.** Okay. So if you go down to about row 20 can you
16 read what Mr. Davidson received in the 26th legislative
17 district?

18 **A.** By the Davidson 20 metric that would have been at
19 53 percent.

20 **Q.** Okay. And you also mentioned you worked in the
21 legislature. Do you happen to know the partisan affiliation
22 of the state senator who represents the 26th legislative
23 district?

24 **A.** Senator Emily Randall is a Democrat.

25 **Q.** Thank you. If you look a couple lines further

1 down at legislative district 10 what was the Davidson 2020
2 percentage in relation to district 10?

3 MS. WAKNIN: Objection. Relevance.

4 THE WITNESS: That is 52.2.

5 BY MR. STOKESBARY:

6 Q. And again, do you happen to know off the top of
7 your head the political affiliation -- partisan affiliation
8 of the state representatives who represent the 10th
9 legislative district?

10 A. Representative Dave Paul is affiliated with the
11 Democratic party.

12 Q. Okay. And then looking back to Exhibit 9 -- this
13 is the last one of these, I promise -- the very next row.
14 The 42nd legislative district. What does that show that
15 then Treasurer Davidson received in 2020?

16 MS. WAKNIN: Objection. Relevance.

17 THE WITNESS: 48.8 percent.

18 BY MR. STOKESBARY:

19 Q. And do you happen to know the partisan affiliation
20 of the state senator from the 42nd legislative district?

21 A. He is a Republican. Simon Sefzik.

22 Q. Okay. So Mr. Grose, is it fair to say that just
23 because one political party in a statewide race might have
24 won within a given legislative district that does not
25 necessarily mean that all members of that party for

1 **legislative races will always win, lose if there is some**
2 **variation?**

3 A. That's correct. This is an inherent issue when
4 only measuring districts by one specific metric, not a whole
5 host of metrics. I suspect if you compared 10 to 11 of
6 these districts by different statewide races you would see
7 vastly different -- sometimes conflicting -- results based
8 on partisanship.

9 Q. Can you think of reasons why -- using the examples
10 I just had you look at -- why, for example, Senator Randall
11 would have received more votes than the Democrat running for
12 Treasurer or why Senator Sefzik in the 42nd district -- bad
13 example. Why Representative Paul in the 10th district might
14 receive more votes than the Democratic candidate for
15 Treasurer?

16 A. There may be a wide number of reasons for that.
17 One, this could be a bad -- not a perfect indicator here.
18 Two, certainly campaigns, candidates all matter in the
19 election space.

20 Money certainly plays a large role too where
21 organizations or candidates are raising and spending money
22 to turn out their electorate, attract their electorate,
23 convince voters why they belong in office. There's a great
24 number of reasons even beyond that. But I think that would
25 answer your question.

1 BY MR. STOKESBARY:

2 Q. Yeah. So I think -- would a fair summary be that
3 who the candidate is and what they do on the campaign trail
4 can determine whether or not they will receive more or fewer
5 votes than other folks on the ballot of their same partisan
6 affiliation?

7 A. Absolutely. Especially in competitive districts.

8 Q. Okay. Well, I also want to return to a question
9 that Mr. Hughes asked you about the 2022 elections in the
10 15th legislative district. So either before today or based
11 on what Mr. Hughes showed you, you're aware that there is no
12 Democratic candidate who filed for office in any of the
13 three legislative seats up for reelection this year.

14 A. Correct.

15 Q. Going back to your work experience, you mentioned,
16 again, Political Director for the State Republican party.
17 When you served in that role do you recall Republicans
18 spending much time or resources running for legislative
19 office in, say, Seattle districts?

20 A. Certainly not allocating much resources to the
21 Seattle area.

22 Q. Why do you think that is?

23 A. These were very blue districts, districts that
24 have historically voted very Democratic. The electorate
25 there is certainly much more progressive than even suburban

1 or even other urban districts for that matter. So it would
2 seem as though it's a -- not a good allocation of resource.

3 **Q. So generally you didn't -- the Republican party**
4 **either didn't field a candidate or didn't put significant**
5 **resources behind a candidate in the areas where they felt**
6 **that it was unwinnable.**

7 **A. Correct.**

8 **Q. And conversely, to the extent that you viewed a**
9 **district as an area where a Republican candidate might win,**
10 **to your recollection did Republicans always put up a**
11 **candidate in those races during the years you served as**
12 **political director?**

13 **A. In areas that we could win, yes. Yes; I believe**
14 **we did in all circumstances to the best of my knowledge.**

15 **Q. So again, based on your kind of work experience in**
16 **the political space, would a fair inference of, for example,**
17 **Democrats in 2022 in the 15th district not fielding a**
18 **candidate -- might it be reasonable to infer that Democrats**
19 **viewed that district as unwinnable?**

20 **MS. GOLDMAN:** Objection. Calls for speculation.

21 **THE WITNESS:** I would say that's a poor decision.
22 Poor electoral decision, political decision, however you
23 want to look at it. I certainly think the district, as was
24 noted earlier, certainly could have been competitive.

25 **BY MR. STOKESBARY:**

1 Q. Okay. Last question or, I guess, pair of
2 questions. Again, you mentioned that you've been involved
3 in politics in your spare time. You're sort of a casual
4 observer of some of these things. Do you have any
5 familiarity with Hispanic voting trends, whether generally
6 across the country or specific to Washington state?

7 MS. WAKNIN: Objection. Compound.

8 THE WITNESS: Broadly speaking, yes. There's been
9 a lot of ado about this over the last -- really last several
10 years. But most notably of the last year or so.

11 BY MR. STOKESBARY:

12 Q. Based on your experience does it appear that an
13 increasing number of Hispanic voters are voting for
14 Republican candidates around the country?

15 MS. WAKNIN: Objection. Relevancy.

16 THE WITNESS: Certainly plenty of polling would
17 indicate that. Actual election results have been fairly
18 indicative of that as well. I think the Rio Grande Valley
19 certainly has come up very frequently with the special
20 election there.

21 But in other parts of the country as well, not
22 just southern states. But I believe we saw similar results
23 in Virginia, although I would have to go back and look to be
24 certain on that.

25 But no; it does not seem isolated. It seems

1 generally cohesive, although, again, Hispanics are also not
2 a monolith and different sects of communities will vote
3 slightly different than others.

4 **BY MR. STOKESBARY:**

5 **Q. And what about Washington state specifically? Any**
6 **indication that an increasing number of Hispanics are voting**
7 **for Republicans over time?**

8 **A.** I do believe we've seen Alex Ybarra overperform
9 his Caucasian counterparts in the 13th district. And I'd
10 have to go back and -- I don't think I've looked at the most
11 recent results for the 13th district.

12 But I do believe he's now ran two elections. At
13 least one in which I believe he overperformed pretty
14 significantly. Other than that I have not seen any
15 Washington state-specific polling on that.

16 **MS. WAKNIN:** Now that I've heard the answer I'm
17 going to object to speculation.

18 **MR. STOKESBARY:** That's my last question for you,
19 Mr. Grose. Thank you so much for sitting through all this.

20 **MS. GOLDMAN:** Okay. Thank you, all. We are at or
21 beyond seven hours, and we are leaving.

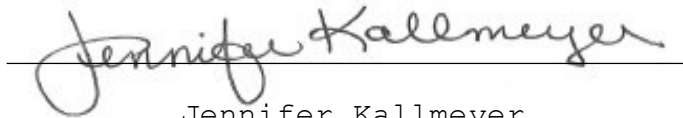
22 **(WHEREUPON, the deposition of ANTON GROSE was**
23 **concluded at 5:54 p.m.)**
24
25

CERTIFICATE

I, Jennifer Kallmeyer, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 9th day of September, 2022.

A handwritten signature in cursive script, reading "Jennifer Kallmeyer", is written over a horizontal line.

Jennifer Kallmeyer

1 Date: September 9, 2022 Assignment #: 59092

2 Deponent: Anton Grose

3 Case: Susan Soto vs. Hobbs, et al.

4 **DEPONENT:** It has been requested that you read and sign
5 your transcript. This transcript is to be read only by
6 you. Please make any corrections necessary on the
7 Correction Sheet ONLY. You are to sign the Correction
8 Sheet where indicated.

9 After signing the Correction Sheet, do the following:

10 1.The ORIGINAL executed Correction Sheet needs to be
11 returned to our corporation.

12 2.Forward a COPY of the executed Correction Sheet
13 directly to the attorney(s) listed below.
14 (The address(es) can be found on the Appearance Page
15 of your deposition.)

16 3.Retain a copy for your records.

17

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19 Sonni R. Waknin, Esquire Cristina Huang Sepe

20 Jessica L. Goldman, Esquire Bernadette Samson Reyes

21 Andrew R. W. Hughes, Esquire Chad Dunn, Esquire

22 Andrew R. Stokesbary, Esquire Ernest I. Herrera

23 Simone T. Leeper, Esquire Deylin O. Thrift-Viveros

24 Aseem B. Mulji, Esquire Edwardo Morfin

25 Erica Franklin, Esquire

CORRECTION SHEET

Deposition of: Anton Grose

Date: 08/16/22

Regarding: Susan Soto vs. Hobbs, et al.

Reporter: Kallmeyer/Sullivan

Please make all corrections, changes or clarifications to your testimony on this sheet, showing page and line number. If there are no changes, write "none" across the page. Sign this sheet on the line provided.

Page	Line	Reason for Change
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[illegible]

Signature

Anton Grose

DECLARATION

Deposition of: Anton Grose Date: 08/16/22

Regarding: Susan Soto vs. Hobbs, et al.

Reporter: Kallmeyer/Sullivan

I declare under penalty of perjury the following to
be true:

I have read my deposition and the same is true and
accurate save and except for any corrections as made
by me on the Correction Page herein.

Signed at _____, _____
on the _____ day of _____, 2022.

Signature _____

Anton Grose

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