

EXHIBIT 34

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

* * * * *

Deposition Upon Oral Examination of
Paul Campos
August 15, 2022

* * * * *

REPORTED BY:
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Paul Campos

August 15, 2022

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, in his official
capacity as Secretary of State
of Washington, and the STATE OF
WASHINGTON,

Defendants,

and

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

Intervenor-Defendants.

No. 3:22-cv-05035-RSL

DEPOSITION UPON ORAL EXAMINATION OF
PAUL CAMPOS

Monday, August 15, 2022
9:00 a.m. to 4:40 p.m.

Lowe Graham Jones, PLLC
1325 Fourth Avenue, Suite 1130
Seattle, Washington

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25

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1 August 15, 2022, Seattle, Washington:

2 PROCEEDINGS: 9:06 a.m.

3 (Zoom conferencing initiated for all participants.)

4 (Discussion off the record.)

5 PAUL CAMPOS,

6 having been sworn/affirmed on oath to tell the truth, the
7 whole truth, and nothing but the truth, testified as
8 follows:

9 E X A M I N A T I O N

10 BY MS. LEEPER:

11 Q Good morning, Mr. Campos. We just met, but for the
12 record my name is Simone Leeper, and I'm here representing
13 the plaintiffs in this case.

14 A Good morning.

15 Q Good morning. I'm going to be asking you the
16 questions today. Before I do I just want to identify some
17 other individuals that are here, both in person and
18 virtually.

19 So obviously we have your counsel, Ms. Goldman. We
20 have Andrew Hughes here representing the State of
21 Washington. Here we have with me some additional
22 plaintiffs' counsel, but I don't think that they'll be
23 speaking today, also the same on the phone.

24 And then also on Zoom we have Drew Stokesbary
25 and Phil Gordon who are representing the

1 intervenor-defendants in this matter.

2 So you know, any of these individuals, some of these
3 individuals might object at some point to a question that
4 I ask; and if they do, that objection is going to be noted
5 for the record, but then you should still go ahead and
6 give the answer to that question.

7 Does that make sense?

8 A Okay.

9 Q Okay. On that note of the okay, for the
10 transcription it's a lot easier if whenever I ask a
11 question you give a verbal answer. So I know it's my
12 inclination sometimes just to nod or shake my head or give
13 answers like uh-uh or um-hmm, so if you can keep it to
14 more crisp words like yes or no and keep all of your
15 answers verbal.

16 Does that make sense?

17 A That makes sense.

18 Q Okay. The court reporter, Jeanne here, is
19 transcribing everything that we say; and so to make her
20 life easier I'm going to do my best to not cut you off,
21 and if you could let me finish my questions and not cut me
22 off, that way her life will be easier and will make for a
23 nice, clean transcription.

24 Does that work for you?

25 A Sure. Yes.

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1 Q Sure is fine. Don't worry.

2 A Okay.

3 Q And if at any point you need to take a break, I'll
4 be trying to take them periodically so that we're not just
5 going for too long; but if you need a break, just let me
6 know and we can do that. My only request is that you not
7 do that while a question and answer is pending.

8 Does that work?

9 A Yeah, that will work.

10 Q Okay. Great.

11 All right. Mr. Campos, could you please state your
12 full name, and spell it for the record?

13 A Legally Pablo G. Campos, P-A-B-L-O, G period,
14 C-A-M-P-O-S.

15 Q And what is your race?

16 A What is my race? I'm a Mexican American.

17 Q Okay. In today's deposition we're going to be using
18 the terms Hispanic and Latino interchangeably, and we're
19 going to be using them to refer to non-white people that
20 identify as Hispanic or Latino.

21 When I refer to white residents I'm going to be
22 referring to white residents who do not identify as
23 Hispanic or Latino. And excuse me. I misspoke just then.

24 By specifying the race -- let me try that again --
25 I'm going to be using Hispanic and Latino interchangeably,

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1 and then when I refer to white residents I'm referring to
2 people who do not identify as Hispanic or Latino.

3 Does that make sense?

4 A Okay. Yeah.

5 Q Okay. Do you understand that you are under oath
6 today?

7 A Yes. I just took it.

8 Q Is there any reason why you cannot give truthful
9 answers to the questions?

10 A I don't believe so.

11 Q Are you taking any medications that might impair
12 your memory?

13 A I don't believe so.

14 Q And do you have any conditions that might impair
15 your memory?

16 A Do I have any what?

17 Q Medical conditions that might impair --

18 A No.

19 Q -- your memory.

20 Part of the oath you took today is to tell the whole
21 truth, which means providing full and complete answers to
22 the questions that I ask.

23 Do you understand that?

24 A Yes.

25 Q Sometimes it might happen that you remember more to

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1 an answer to a question later on in the deposition that I
2 asked earlier. If that happens I would just ask that you
3 answer the question that I've asked and then provide the
4 additional information to make the prior answer full and
5 complete at that time.

6 Does that make sense?

7 A Yes.

8 Q Have you ever been deposed before?

9 A No.

10 Q Okay. Have you ever been a party to a lawsuit in
11 your personal or official capacity?

12 A No, I don't think so.

13 Q Have you ever testified at a trial?

14 A No.

15 Q In preparation for this deposition did you meet in
16 person, by phone, Zoom or otherwise with anyone to
17 prepare?

18 A My attorney.

19 Q Okay. Did you meet with anyone else?

20 A No.

21 Q How many times did you meet with your attorney?

22 A Two or three times.

23 Q And to be clear, I'm not asking for the content of
24 any of those conversations, just for the number of
25 meetings.

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1 A I didn't count them.

2 Q Okay.

3 A Two or three times. Not very often.

4 Q And about how long would you say those meetings
5 lasted?

6 A Well, one of them was maybe an hour. The other were
7 fairly short, five or ten minutes, I think.

8 Q Did you review any documents at that meeting with
9 your attorney?

10 A No.

11 Q Did you take any notes?

12 A No.

13 Q Did you discuss this deposition with anyone other
14 than your attorney?

15 A My -- Yeah, my other attorney.

16 Q Other than your attorneys did you discuss this
17 deposition with anyone?

18 A No.

19 Q For example, did you discuss it with any of the
20 commissioners or commission staff?

21 A No.

22 Q Any legislators or legislative staff?

23 A I told my -- the secretary that I was going to be in
24 a deposition.

25 Q But did you talk about the content --

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1 A No. No.

2 Q -- of the deposition?

3 A Nope.

4 Q Have you had any written communications with anyone
5 aside from your attorney to prepare for this deposition?

6 A No.

7 Q Did you review any documents in preparation for this
8 deposition?

9 A I read the -- well, almost read the Complaint. I
10 read most of the Complaint. How's that?

11 Q Okay. And when did you do that?

12 A Probably Monday. No, let's see. Friday.

13 Q And when you say you read most of the Complaint,
14 about how much?

15 A I got to like the last three pages. I didn't read
16 the relief and that part.

17 Q Okay. Did you review any other documents filed in
18 this case?

19 A No.

20 Q All right. So besides the meetings you've already
21 discussed, what else did you do to prepare for this
22 deposition?

23 A Nothing.

24 Q I don't believe so because I don't see them, but do
25 you have any documents present with you today?

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1 A No.

2 Q Have you discussed this lawsuit with anyone other
3 than your attorneys?

4 A This -- No, I don't think so.

5 Q You've not discussed this lawsuit with any of the
6 commissioners or staff of the commission?

7 A The commissioners? Maybe we -- I may have mentioned
8 it was going on, but -- that there was a lawsuit with
9 maybe some of the other staff, but early on. Yeah.

10 Q Do you recall sort of the content of those
11 conversations about the lawsuit?

12 A No, just that it was -- it was filed.

13 Q Have you discussed this lawsuit with any legislators
14 or legislative staff?

15 A No.

16 Q Any --

17 A Or like -- Legislative staff? The same thing, just
18 that it was filed.

19 Q Okay. But nothing about the content?

20 A No.

21 Q How many times would you say that you discussed the
22 lawsuit with legislative staff?

23 A Four.

24 Q And where are you getting that number?

25 A I'm just trying to think of different conversations

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1 I might have had with staff about the lawsuit.

2 Q Okay. One quick sort of additional ground rule or
3 guidance, if you don't know the answer to any of my
4 questions, you can absolutely feel free to say --

5 A Oh.

6 Q -- that you don't know.

7 A Okay. Yeah.

8 Q If you know the answer to one of my questions, you
9 do have to provide the answer.

10 A Sorry. I'll try not to guess.

11 MS. GOLDMAN: And I just want to again
12 counsel you to make sure that you don't interrupt counsel
13 when she's asking you questions because it will be very
14 difficult to read the transcript.

15 So just make sure you give her a chance to get her
16 words out of her mouth.

17 MS. LEEPER: Thank you. I appreciate that.

18 Q (By Ms. Leeper) And one quick question just jumping
19 back a bit, you said you met with your other attorney.

20 Who is that other attorney?

21 A Jeannie Gorrell.

22 Q In your discussions about this lawsuit with the
23 legislative staff, did you ever look at any documents?

24 A No.

25 Q How about in your discussions about the lawsuit with

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1 the commission staff?

2 A No.

3 Q Do you recall which of the staffers you have
4 discussed this lawsuit with from the commission?

5 A I probably mentioned it to Anton.

6 Q Okay. And do you remember the content of that
7 conversation?

8 A That it was filed, and we would be meeting.

9 Q And when you say Anton, do you mean Anton Grose?

10 A Yes.

11 Q Were you asked to conduct any searches in connection
12 with requests for information or production of documents
13 related to this lawsuit?

14 A I was not, not on this one.

15 Q Did you use any devices or accounts in relation to
16 the redistricting process that are not accessible to the
17 state of Washington, such as a personal phone or email
18 account?

19 MR. HUGHES: Object to form.

20 MS. LEEPER: I'll break it down.

21 Q (By Ms. Leeper) Did you use any personal devices in
22 relation to redistricting?

23 A Did I use any personal devices? No. No.

24 Q So you used a government-issued phone?

25 A Well, I used my phone for -- but for redistricting?

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1 I tried to keep that all on a laptop.

2 Q Did you ever do any texting about redistricting?

3 A To some degree, yeah. Sorry.

4 Q Did you ever use any messaging platforms like Signal
5 or WhatsApp?

6 A No.

7 Q Did you use a personal email account for
8 redistricting?

9 MS. GOLDMAN: Objection, vague.

10 Q (By Ms. Leeper) Did you use a personal email
11 account in connection with your work with the Washington
12 Redistricting Commission?

13 A For the work, no.

14 Q Did you use it in connection with the 2021
15 redistricting process?

16 A Yeah.

17 Q Have you provided -- Scratch that.

18 Have you conducted any searches of your personal
19 email account in connection to other lawsuits related to
20 the 2021 redistricting process?

21 A Yes.

22 Q And what lawsuit was that?

23 A The public records lawsuit.

24 Q Did you conduct a search of your text messages for
25 the public records lawsuit?

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1 A Yes.

2 Q Did you conduct those searches on all of the
3 personal accounts that you used in connection with the
4 2021 redistricting process?

5 MS. GOLDMAN: Objection, vague.

6 Q (By Ms. Leeper) Did you --
7 Actually, could you answer that question?

8 A I'm sorry?

9 Q I'll ask again. Did you conduct searches of all
10 personal accounts that you used in connection with the
11 2021 redistricting process?

12 MS. GOLDMAN: Objection, vague.

13 Q (By Ms. Leeper) You can answer.

14 A Oh, did I use -- Sorry. Did I use my personal
15 devices for 20 -- for searches, yes.

16 What was the question again? I'm sorry.

17 Q Did you search your personal devices --

18 A From 2021? Yeah.

19 Q Okay. Did you search your private email accounts
20 for the public records lawsuit?

21 A Yes.

22 Q What email account? You said that you'd used your
23 personal email related to redistricting.

24 What is the address of that email account?

25 MS. GOLDMAN: Objection, misstates the

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1 evidence.

2 A Paul07@Comcast.net.

3 Q (By Ms. Leeper) So it's Paul07@Comcast.net?

4 A Um-hmm.

5 (Reporter request to answer verbally.)

6 A Oh, yes.

7 Q We're going to get more into this later, but just an
8 introductory question for now.

9 Did you use any outside accounts or software to draw
10 maps in the redistricting process of 2021, such as Dave's
11 Redistricting app?

12 A Yes.

13 Q Did you use any other software or accounts to draw
14 maps?

15 A No.

16 Q Did you only have one Dave's Redistricting app
17 account?

18 A Yes.

19 Q And what is the email address used for that account?

20 A The same one.

21 Q Were you ever asked to conduct searches of that
22 account in connection with requests for information or
23 production of documents related to this lawsuit?

24 MS. GOLDMAN: Objection, vague.

25 A No.

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1 Q (By Ms. Leeper) How about for the public records
2 lawsuit?

3 MS. GOLDMAN: Objection, vague.

4 A What was the question for that?

5 Q (By Ms. Leeper) Yeah. Were you asked to conduct any
6 searches of your Dave's Redistricting app account in
7 connection with the public records lawsuit?

8 A Yes, I think.

9 Q Did you make any productions from your Dave's
10 Redistricting app account in connection with the public
11 records lawsuit?

12 A No.

13 Q Have you deleted any emails or electronic
14 communications that you made or received in connection
15 with the 2021 redistricting process?

16 A No, I don't believe so.

17 Q Have you deleted any text messages or voice mails
18 that you made or received in connection with the 2021
19 redistricting process?

20 A I may have. I don't remember.

21 Q Have you ever used any methods of communication set
22 to automatically delete communications that you made or
23 received in connection with the 2021 redistricting
24 process?

25 A No.

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1 Q Have you deleted any of the maps created in the 2021
2 redistricting process using your Dave's Redistricting app
3 account?

4 A No.

5 Q Were you asked to conduct any searches in connection
6 with requests for information or production of documents
7 related to the Garcia v. Hobbs lawsuit?

8 A No, I don't think so.

9 Q Why did you at times use your personal email account
10 rather than your official account?

11 A Because occasionally somebody would send me a note
12 there, so I would respond there.

13 Q Do you recall who had sent you notes there?

14 A No.

15 Q Did any legislators send you notes on your personal
16 email account?

17 A Did any legislators send me -- Yes.

18 Q Did any legislators send you emails related to
19 redistricting on your personal email account?

20 A Yes.

21 Q Do you recall who those legislators are?

22 A I know one was Senator Holy.

23 (Reporter request for clarification.)

24 THE WITNESS: Holy.

25 Q (By Ms. Leeper) Could you give his full name,

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1 please?

2 A Senator Jeff Holy.

3 Q Do you recall any legislators reaching out to you by
4 text message related to the 2021 redistricting process?

5 A No.

6 Q Did you text message with commission staffers
7 related to the 2021 redistricting process?

8 A Did I text message? Probably -- Yeah, maybe. Yeah.

9 Q And with whom?

10 A Probably Lisa, and I think that may have been it.

11 Q Could you give her full name, please?

12 A Lisa McLean, the executive director.

13 Q Did you ever text with Anton Grose about the 2021
14 redistricting process?

15 A Yeah, probably.

16 Q Did you text with any of the commissioners about the
17 2021 redistricting process?

18 A Yeah. Yes.

19 Q And which commissioners?

20 A Senator Fain -- Commissioner Fain.

21 Q How about Commissioner Graves?

22 A I don't believe I did, no.

23 Q Commissioner Walkinshaw?

24 A I don't think so.

25 Q Commissioner Sims?

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1 A I doubt it. I don't think so.

2 Q And did you text with Ms. McLean?

3 A Did I text with her?

4 Q Regarding the 2021 redistricting process.

5 A Yeah. Didn't I just answer that?

6 Q I'm unclear really quickly if that was for the email
7 or for texting. That was for the texting?

8 A Yes.

9 Q And how about that was also for your email, you
10 emailed with Ms. McLean on your personal account, or no?

11 A Oh, I don't think so.

12 Q Okay. Are you familiar with Drew Stokesbary?

13 A He's a Representative, yes.

14 Q And how do you know him?

15 A He's a Representative.

16 Q Have you ever discussed anything related to this
17 case with him?

18 A No.

19 Q Have you ever discussed anything related to the
20 Garcia v. Hobbs case --

21 A No.

22 Q -- with him?

23 MR. STOKESBARY: Objection, relevance. I'm
24 sorry, this is Drew Stokesbary, counsel for the
25 intervenors.

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1 Q (By Ms. Leeper) Are you familiar with an individual
2 named José Trevino?

3 A I don't think so.

4 Q Are you familiar with an individual named
5 Ismael Campos?

6 A Yes.

7 Q How do you know Mr. Campos?

8 A Mr. Campos is my brother.

9 Q I imagine you know him rather well then.

10 A Yes.

11 Q Have you ever discussed anything related to this
12 case with him?

13 A No.

14 Q Did you speak with your brother regarding the 2021
15 redistricting process regarding the 2021 redistricting
16 process?

17 A Yes.

18 Q How often would you say you spoke with him about the
19 redistricting?

20 A Over the course of a year?

21 Q Yes.

22 A Half a dozen times, maybe.

23 Q How did you have those conversations, over email,
24 texting, in person?

25 A Telephone calls.

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1 Q And do you recall the content of those
2 conversations?

3 A That redistricting was going on, and how it would
4 affect him and the area that they lived in.

5 Q What conversations did you have about how the
6 redistricting would affect him?

7 A Whether the line was going to move.

8 Q Did he express any opinions to you about the
9 redistricting?

10 A I don't think so.

11 Q Did you express any opinions to him about how the
12 redistricting would impact him?

13 A I guessed about population-wise where the
14 populations were and how that might shift lines.

15 Q Did you specifically talk about the lines of
16 Legislative District 14 or Legislative District 15 with
17 him?

18 A Probably 15.

19 Q Did he express any preferences about the placement
20 of the lines of Legislative District 15?

21 A No, not that I remember.

22 Q Are you familiar with an individual named Alex
23 Ybarra?

24 A Yes.

25 Q How do you know Mr. Ybarra?

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1 A He's a State Representative.

2 Q Have you ever discussed anything related to this
3 case with him?

4 A No.

5 Q Are you aware that your brother is an intervenor in
6 this lawsuit?

7 A Yes.

8 Q And have you discussed this lawsuit with your
9 brother?

10 A Yes.

11 Q How often?

12 A Twice, maybe.

13 Q And what was the content of those conversations?

14 A That he was an intervenor, and we probably shouldn't
15 talk about it.

16 Q Did you discuss anything other than the fact that
17 you shouldn't talk about it?

18 A Not that I remember, no.

19 Q Did your brother discuss with you why he intervened
20 in this lawsuit?

21 A No.

22 Q Do you know any of the plaintiffs in this lawsuit?
23 And I can go through their names if I need to.

24 A I don't know who the plaintiffs are, so --

25 Q Okay. Do you know Susan Soto Palmer?

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1 A No.

2 Q Do you know Alberto Isaac Macias?

3 A No.

4 Q Do you know Faviola Lopez?

5 A No, not that I'm aware of.

6 Q Do you know Caty Padilla?

7 A Not that I'm aware.

8 Q Do you know Evangelina Aguilar?

9 A Benni?

10 Q Bengie, yes.

11 A Yeah, okay. She ran for the State Senate, I

12 believe, at one point. That's all I know of her.

13 Q Have you ever personally met her?

14 A No.

15 Q Did you take a position on her campaign?

16 MS. GOLDMAN: Objection, irrelevant.

17 A No.

18 Q (By Ms. Leeper) Do you know Lizette Parra?

19 A No.

20 Q Do you know Heliadora Morfin?

21 A Not that I know of.

22 Q Have you heard of an organization called the

23 Southcentral Coalition of People of Color for

24 Redistricting?

25 A Only from reading about it in the Complaint.

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1 (Reporter request for clarification.)

2 THE WITNESS: In the Complaint. I'm sorry.

3 Q Had you heard of them prior to the Complaint?

4 A No.

5 Q Is there any reason that you would be unavailable
6 during the week of January 9th, 2023?

7 MR. HUGHES: Objection, relevance.

8 MS. LEEPER: That's the week of trial.

9 MR. HUGHES: Not anymore.

10 MS. LEEPER: That is still on the calendar
11 as the week of trial. I'll ask again.

12 Q (By Ms. Leeper) Is there any reason --

13 MR. STOKESBARY: Objection -- Objection,
14 relevance. That is not the week of trial.

15 MS. WAKNIN: We just got the email.

16 MS. LEEPER: Oh, excuse me. I was not
17 looking at my emails this morning. Moving on.

18 Q (By Ms. Leeper) Mr. Campos, let's talk a little bit
19 about your educational and work background.

20 Where did you go to high school?

21 A White Swan High in White Swan, Washington.

22 MS. GOLDMAN: And excuse me. I'm going to
23 ask you, Mr. Campos, to take your hand down from your
24 mouth just because it makes it more difficult for the
25 court reporter to accurately transcribe what you're

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1 saying.

2 THE WITNESS: Sorry.

3 THE REPORTER: Thank you.

4 A White Swan, Washington. White Swan High School.

5 Q (By Ms. Leeper) Where did you go to college?

6 A University of Washington.

7 Q What did you study in college?

8 A I ended up --

9 MR. STOKESBARY: Objection, relevance.

10 Q (By Ms. Leeper) You can answer.

11 A Let's see. International studies and political
12 science.

13 Q Do you have any postgraduate degrees?

14 A No.

15 Q What jobs have you had since you graduated college?

16 MR. STOKESBARY: Objection, relevance.

17 Mr. Campos is not an expert witness. His education is not
18 relevant.

19 Q (By Ms. Leeper) You can answer the question.

20 A What jobs have I had since college? I worked for
21 U.S. Senator Dan Evans. I then got a -- Then I went to
22 work for the State Senate, been there ever since.

23 Q What jobs have you had at the State Senate?

24 A I was going to say all of them. Let's see. I
25 started out as a redistricting staffer, and then I became

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1 an IT staffer, and then a communications person, and then
2 a research analyst and did that for a while. Had been
3 deputy secretary a couple of times, senior staff
4 coordinator, facilities director.

5 Q And you said you started out as a redistricting
6 staffer. What was that job?

7 A Setting up the computers that we used for the 1991
8 redistricting effort.

9 Q Did you do anything else for the 1991 redistricting
10 effort?

11 A Not that I remember.

12 Q And when you say setting up the computers, forgive
13 me, is that just a truly IT sort of situation, or were you
14 setting up mapping software?

15 A All of it.

16 MS. GOLDMAN: Objection, vague.

17 A All of it.

18 Q (By Ms. Leeper) All of it.

19 Are you currently employed?

20 A Yes.

21 Q What is your current job?

22 A State Senate.

23 Q What do you do at the State Senate?

24 A I -- Again, I'm -- Let's see. I try to handle
25 facilities issues. We're working on a new building. And

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1 I do -- edit the State Senate Journal and update our
2 publications on history of the legislature.

3 Q You currently live in the Olympia area; correct?

4 A Yes.

5 Q How long have you lived in Olympia?

6 A Since 1991.

7 Q And you mentioned you went to White Swan High
8 School.

9 A Um-hmm.

10 Q That is in the Yakima County area; correct?

11 A The Upper Valley, as I like to call it.

12 Q When is the last time you lived in Yakima County?

13 A Probably 1986.

14 MR. STOKESBARY: Objection, relevance.

15 Q (By Ms. Leeper) What do you know about the
16 demographics of the Yakima Valley and Pasco region?

17 MS. GOLDMAN: Objection, vague.

18 A Anecdotally what do I know about the demographics?

19 Q (By Ms. Leeper) Do you know how much of the
20 population in the Yakima Valley and Pasco region is
21 Latino?

22 A No.

23 Q Do you know how much of the voting age population in
24 that area is Latino?

25 A No.

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1 Q Or the citizen voting age population?

2 A No.

3 Q Are you aware of how the demographics of that area
4 have shifted in the last decade?

5 A No.

6 MR. STOKESBARY: Objection, vague.

7 Q (By Ms. Leeper) Do you agree that members of the
8 Latino community have experienced discrimination in the
9 Yakima County and Pasco region?

10 MS. GOLDMAN: Objection. Object to form.

11 MR. STOKESBARY: Objection, same.

12 Q (By Ms. Leeper) You can answer.

13 MR. HUGHES: I was going to object to
14 vague, on vagueness grounds.

15 A What's the question?

16 Q (By Ms. Leeper) Do you agree that members of the
17 Latino community have experienced discrimination in the
18 Yakima Valley and Pasco region?

19 MS. GOLDMAN: Objection.

20 MR. STOKESBARY: Also, objection as to
21 vagueness.

22 Q (By Ms. Leeper) You can answer.

23 MS. GOLDMAN: Join. I join in that
24 objection.

25 A Yes, some.

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1 Q (By Ms. Leeper) In what ways?

2 A How they have experienced discrimination?

3 Q Yes.

4 A In terms of job opportunities, housing, any number
5 of ways.

6 Q Do you agree that members of the Latino community
7 continue to face discrimination in housing in the Yakima
8 County and Pasco region?

9 MS. GOLDMAN: Objection, --

10 MR. STOKESBARY: Objection as to form.

11 MS. GOLDMAN: -- calls for speculation.

12 MR. STOKESBARY: Objection for vagueness.

13 MS. GOLDMAN: I'm sorry, Mr. Stokesbary.
14 Go ahead and state yours, and I'll wait until you're done.

15 MR. STOKESBARY: I'm sorry as well. I was
16 trying to be quicker.

17 Objection as to form and objection as to vagueness.

18 MS. GOLDMAN: And I object that it calls
19 for speculation.

20 A No, not personally.

21 Q (By Ms. Leeper) So you don't personally believe
22 that, or you don't personally face that discrimination?

23 MS. GOLDMAN: Objection as to form, vague.

24 A I don't know of any person -- I don't know of any
25 real situation.

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1 Q (By Ms. Leeper) So you don't have knowledge of that?

2 MS. GOLDMAN: Objection as to form, vague.

3 A Right.

4 Q (By Ms. Leeper) Do you have any knowledge about the
5 voting patterns of Latino voters in the state of
6 Washington?

7 MR. HUGHES: Objection, vague.

8 A Not directly, no.

9 Q (By Ms. Leeper) Have you studied any election
10 returns in Washington to see the voting patterns of Latino
11 voters?

12 MS. GOLDMAN: And I'm sorry, Counsel, did
13 you say studied?

14 MS. LEEPER: Studied, yes.

15 MR. HUGHES: Same objection.

16 A No.

17 Q (By Ms. Leeper) Have you viewed election returns in
18 Washington separated out by race?

19 A Yes.

20 Q Do you have any knowledge specifically about the
21 voting patterns of Latino voters in the Yakima Valley and
22 Pasco region?

23 A No.

24 Q Do you have any knowledge about the voting patterns
25 of white voters in the Yakima County and Pasco region?

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1 A No.

2 Q Have you ever reviewed any election returns with
3 voting patterns by race for Washington state legislative
4 races?

5 A Yes.

6 Q What data have you reviewed about voting patterns by
7 race in Washington state legislative races?

8 A So during redistricting we took the census data and
9 compared -- you know, moved -- Well, I don't know,
10 actually.

11 Voting patterns? No, I don't. I guess I haven't.

12 Q Have you reviewed any election returns broken down
13 by race for the Yakima Valley and Pasco region?

14 A Yes.

15 Q And is that also for state legislative races in the
16 Yakima Valley and Pasco region?

17 A Yeah. Yes. I'm sorry.

18 Q Have you looked at anything other than election
19 returns broken down by race for the Yakima Valley --
20 Yakima Valley and Pasco region?

21 A Other than the -- Yeah. I mean, just the general
22 demographic reports that the Census Bureau generated.

23 Q Have you seen any opinion polls focused on Latino
24 voters in the Yakima Valley and Pasco region?

25 A Not that I remember.

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1 Q How about for the state of Washington more broadly?

2 A No.

3 Q Had you reviewed or conducted any statistical
4 analysis to determine the breakdown of votes by race for
5 seats in the state legislature?

6 A No.

7 Q Do you know what ecological regression is?

8 A No.

9 Q Do you know what ecological inference is?

10 A No.

11 Q Do you know what the term racially polarized voting
12 means?

13 A Yes.

14 Q What is your understanding of that term?

15 A Okay. I'm glad you followed up.

16 I think it's voting by minorities or other races
17 based on the candidate's race, and that minorities may
18 tend to vote more for one candidate than another, and
19 others.

20 MR. HUGHES: I'm sorry. Can I just
21 interpose a late objection. That calls for a legal
22 conclusion.

23 Q (By Ms. Leeper) What do you base your understanding
24 of that term on?

25 A News articles.

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1 Q Do you have an opinion on whether racially polarized
2 voting as you understand it exists in the Yakima Valley
3 and Pasco region?

4 MS. GOLDMAN: I'm going to object.

5 MR. STOKESBARY: Objection, relevance.

6 MS. GOLDMAN: And I'm going to object as to
7 relevance and that it calls for speculation.

8 MR. HUGHES: I'll object as a legal
9 conclusion.

10 A Do I have an opinion as to what?

11 MS. LEEPER: And I'll just say I'll carry
12 all of your guys' objections over so he can answer right
13 after I ask the question so he remembers it this time.

14 Q (By Ms. Leeper) Do you have an opinion on whether
15 racially polarized voting as you understand it exists in
16 the Yakima Valley and Pasco region?

17 A Do I have an opinion? No.

18 MR. HUGHES: I didn't hear the answer on
19 that one.

20 MS. LEEPER: Pardon?

21 MR. HUGHES: I didn't hear.

22 THE REPORTER: He said no.

23 MR. HUGHES: No? Thank you.

24 Q (By Ms. Leeper) Do you recall any specific news
25 articles that you base your understanding of racially

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1 polarized voting on?

2 A No.

3 Q Each legislative district in Washington has three
4 seats; correct?

5 MS. GOLDMAN: Objection, vague.

6 Q (By Ms. Leeper) Each legislative district in
7 Washington has two State House representatives; correct?

8 A Yes.

9 Q And one state senator?

10 A And one state -- and one state senator.

11 Q And each state representative is elected every two
12 years; yes?

13 A Yes.

14 Q And each state senator is elected every four years;
15 correct?

16 A Yes.

17 Q And the years in which these elections take place
18 varies by difference; right -- or by district; right?

19 A Yeah.

20 MR. STOKESBARY: Objection, vague.

21 Q (By Ms. Leeper) The years in which these elections
22 take place varies by district; correct?

23 A The years, yeah.

24 Q Let's talk about Legislative District 15. All three
25 of Legislative District 15 seats will be up for election

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1 in 2022; correct?

2 A All three will be up in '22, yes.

3 Q And then there will be an election for State
4 Representative in 2024; right?

5 A Probably two, yes.

6 Q And the next Senate election in LD 15 will be in
7 2026; correct?

8 A Correct.

9 MR. STOKESBARY: Objection, calls for
10 speculation. A legislator could resign or die, --

11 MS. LEEPER: Okay.

12 MR. STOKESBARY: -- have a special
13 election.

14 THE WITNESS: True.

15 MS. GOLDMAN: And I would just like to
16 counsel Mr. Campos because we're doing this on Zoom, which
17 is very awkward, please wait a second before you answer
18 just to give the attorneys who are on the screen and are
19 lagging a chance to object or respond before you do.

20 THE WITNESS: Sorry.

21 MS. LEEPER: Okay.

22 MS. WAKNIN: And I would ask counsel also
23 --

24 MR. MORFIN: I would like to make a
25 standing objection. This is Eddie Morfin. Especially as

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1 to Mr. Stokesbary, I would like to just caution
2 Mr. Stokesbary not to be coaching the witness. I think
3 that's very inappropriate.

4 MR. STOKESBARY: Respectfully, sir, I don't
5 think I was coaching the witness. I was explaining the
6 reason for my objection.

7 MS. LEEPER: And we would ask that there
8 not be any speaking objections as well. Thank you.

9 Q (By Ms. Leeper) All right. Let's talk about
10 Legislative District 14. Two of Legislative District 14's
11 positions have scheduled elections in 2022; correct?

12 A Yes.

13 Q And those are the two House seats?

14 A Yes.

15 Q And then all three seats are scheduled to be up for
16 election in 2024; correct?

17 A Yeah. Yeah.

18 Q And the Senate election in Legislative District 14
19 is always aligned with the presidential and governor's
20 election; correct?

21 A Oh, yeah. I guess.

22 Q You'd agree that voter turnout is generally higher
23 in presidential years; right?

24 MS. GOLDMAN: Objection, calls for
25 speculation, relevance.

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1 A Yes.

2 Q (By Ms. Leeper) And you're aware that Latino voter
3 turnout is lower than white voter turnout in general;
4 correct?

5 MS. GOLDMAN: Objection, calls for
6 speculation, relevance.

7 MR. STOKESBARY: Intervenors agree with the
8 objection.

9 A Yeah, that's something I'm generally aware of.

10 Q (By Ms. Leeper) Are you aware that Latino voter
11 turnout is lower in off-year elections?

12 MS. GOLDMAN: Objection, calls for
13 speculation, relevance.

14 A Everybody's turnout is lower in off-year elections.

15 Q (By Ms. Leeper) What redistricting cycles have you
16 been involved in in some capacity?

17 A Which ones?

18 Q Yes.

19 A 1991, 2001, 2011, 2021.

20 Q Beyond what you've already explained earlier -- and
21 if that covers it, you can just say that -- in what
22 capacity were you involved in the 1991 redistricting
23 cycle?

24 MS. GOLDMAN: Objection as to relevance.

25 A I was a staffer assigned to setting up the computers

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1 and setting up the data and the mapping software.

2 Q (By Ms. Leeper) Did part of your work in 1991
3 involve drafting maps?

4 A Oh, yeah.

5 Q In what capacity were you involved in the 2001
6 redistricting cycle?

7 A 2001? Sorry.

8 MR. STOKESBARY: Objection as to relevance.

9 MS. GOLDMAN: I join that objection, and it
10 calls -- Yes.

11 A So I was more of the lead staff, less of the data
12 and software setup and more of mapping and consulting.

13 Q (By Ms. Leeper) What job did you hold during the
14 2001 redistricting cycle?

15 A Research analyst, I assume. I can't remember.

16 Oh, '91?

17 Q 2001.

18 A Oh, 2001. Research analyst.

19 Q Were you working for a commissioner in that cycle?

20 A No.

21 Q Were you working for a political party?

22 A I was working for the Republican caucus.

23 Q Did part of your work in 2001 involve drafting maps?

24 A Isn't that what we were talking about?

25 Q Yes.

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1 A Yes.

2 Q And you were also one of the official recipients of
3 the PL 94 data in 2001; is that correct?

4 A Yes, I think so.

5 Q In what capacity were you involved in the 2011
6 redistricting cycle?

7 A Just helping set up the commission work on the front
8 end, as I recall.

9 Q What job did you hold during that cycle?

10 A I think I was a facilities director for the Senate.

11 Q Were you working for a political party in the 2011
12 redistricting cycle?

13 A I was working for administration, so no, not
14 directly. I was working for both of them.

15 Q And did part of your work in the 2011 redistricting
16 cycle involve drafting maps?

17 A No.

18 Q And you were also one of the official recipients of
19 PL 94 data in that cycle as well; correct?

20 A I may have been.

21 Q When you were drafting maps in the 2001
22 redistricting cycle which software was used?

23 MS. GOLDMAN: Objection as to relevance.

24 A In '91?

25 Q (By Ms. Leeper) The 2001.

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1 A 2001? Autobound, I think.

2 Q You were involved in the 2021 redistricting cycle in
3 Washington state; correct?

4 A Yes.

5 Q What was your role --

6 MR. STOKESBARY: Objection, asked and
7 answered.

8 Q (By Ms. Leeper) What was your role in that cycle?

9 MS. GOLDMAN: Objection as to relevance.

10 A So in 2021 basically the staffer in charge of making
11 sure the data and the maps were set up and ready to go,
12 and I did a lot of the mapping.

13 Q (By Ms. Leeper) Did you work for any particular
14 commissioner in the 2021 cycle?

15 A I worked with the caucus.

16 Q Did you work in particular with any of the
17 commissioners?

18 A I consulted with Fain.

19 Q Did you consult with any other commissioners?

20 A Well, Senator -- or Commissioner -- Who was the
21 other one?

22 Q Graves.

23 A Graves. I remembered his first name. Graves.

24 And probably talked to the other two from time to
25 time about redistricting in general.

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1 Q Did you have any prior relationships with any of the
2 commissioners or their staff prior to working on the 2021
3 redistricting cycle?

4 A Commissioner Fain was a former senator, so yeah, he
5 was -- I worked with him quite a bit when he was a
6 senator.

7 Q Did you work with him on anything related to
8 redistricting when he was a senator?

9 A Not that I remember.

10 Q What was your job title for the 2021 redistricting
11 cycle?

12 A Staff coordinator, I believe.

13 Q And you said that was for the caucus; correct?

14 A Yes.

15 Q What is that fully spelled out?

16 A The Republican caucus? It's the Republican members
17 of the State Senate and the leadership there.

18 Q What were your duties as staff coordinator as it
19 related to the 2021 redistricting?

20 A Again, to receive the data and get it ready to use
21 for redistricting.

22 Q You've already mentioned that you worked with
23 Commissioners Fain and Graves. Did you work with any of
24 their staff during the redistricting cycle?

25 MS. GOLDMAN: Objection, vague as to time.

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1 A I don't know what staff they have.

2 Q (By Ms. Leeper) Did you work with Anton Grose?

3 A I worked with Anton.

4 Q Did you work with Ms. McLean?

5 A I worked with Ms. McLean.

6 Q Did you work with any other commission staff?

7 A Probably Justin Bennett, their GIS person, and

8 Jamie Nixon, their communications person.

9 Q Did anyone else at the Republican caucus work on

10 redistricting in the 2021 cycle?

11 A Yes.

12 Q Who?

13 A James Crandall and Min Fei.

14 Q And what is Mr. Crandall's job?

15 A He's an attorney with the caucus.

16 Q And what was his role during the redistricting

17 process?

18 A He was -- He's -- He's the lead person on

19 governmental elections; so he kept tabs on things, and I

20 kept him informed.

21 Q Was he involved in drawing any maps?

22 A No, not really.

23 Q Was he --

24 A Oh, he may have.

25 Q Was he involved in assessing maps that were drawn?

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1 MS. GOLDMAN: Objection, calls for
2 speculation.

3 A Yeah, he may have.

4 Q (By Ms. Leeper) And did he weigh in on any of the
5 maps that you drew?

6 MS. GOLDMAN: And I'm going to instruct the
7 witness this is communications with a lawyer, --

8 THE WITNESS: Sorry.

9 MS. GOLDMAN: -- and so to the degree that
10 the communications concerned seeking or receiving legal
11 advice, I'm going to instruct you not to answer.

12 If you need to consult with me regarding any
13 question you have as to the attorney-client privilege when
14 a question is asked, please advise counsel.

15 THE WITNESS: Okay.

16 Q (By Ms. Leeper) So outside of the attorney-client
17 privilege, was Mr. Crandall, was he involved in assessing
18 any of the maps that you drew?

19 MS. GOLDMAN: Objection, calls for
20 speculation.

21 A Was he involved in assessing? Yes.

22 Q (By Ms. Leeper) Did he make any statements to you
23 about Legislative Districts 14 and 15?

24 MS. GOLDMAN: And again, I'm going to
25 counsel you to the degree that he said anything to you

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1 that was legal advice or legal information, I'm
2 instructing you not to answer the question.

3 And if you don't know, you can tell the counsel that
4 you need to consult.

5 A Can I consult with her?

6 Q (By Ms. Leeper) You can. We'll return to this
7 after our next break.

8 A Oh, okay.

9 Q Let's continue going for now.

10 All right. You said that you also worked with
11 Min Fei?

12 A Um-hmm.

13 (Reporter request to answer verbally.)

14 A Yes.

15 Q Who is Min Fei?

16 A She was our data person.

17 Q And what was her role in the 2021 redistricting
18 cycle?

19 A She would take a lot of the election and demographic
20 data and put them in different mapping areas, geographies.

21 Does that make sense?

22 Q Could you explain that a little bit more? Imagine
23 I'm a layperson that has never drawn a map because, in
24 fact, I haven't.

25 What precisely did Min Fei do?

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1 A So she -- Precincts and block boundaries don't
2 always align. So a precinct or a block group, or
3 whatever, would be larger than a block. So she would take
4 the data reported at those other geographic levels and
5 then run an algorithm to reduce them down to the blocks
6 and so that -- and that's what she did.

7 Q And what did she do with that information?

8 A She would send it back to me.

9 Q And in what form would she send it to you?

10 A Usually Excel files, sometimes shapefiles. GIS
11 files, sorry.

12 Q And what criteria or metrics were included in those
13 Excel files that she was sending back to you?

14 A Well, the election results, the demographic data. I
15 think that's it.

16 Q You were involved with drafting legislative district
17 maps; correct?

18 A Yes.

19 Q Did you draw the maps proposed or internally
20 circulated under Commissioner Fain's name?

21 MS. GOLDMAN: Objection as to form.

22 A Yes, probably.

23 Q (By Ms. Leeper) Did anyone else work with you on
24 drawing those maps?

25 A Other than Senator Fain?

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1 Q Yes.

2 A Not really.

3 Q Did you play a role in drawing maps for any --

4 Did you play a role in drawing any maps that were
5 proposed or internally circulated under Commissioner
6 Graves's name?

7 MS. GOLDMAN: Objection as to form.

8 A Not really.

9 Q (By Ms. Leeper) Were you involved in assessing
10 legislative district maps drawn for any of the
11 commissioners?

12 A Assessing?

13 MR. STOKESBARY: Objection as to vagueness.

14 MS. GOLDMAN: I join that objection.

15 Q (By Ms. Leeper) What do you understand assessing
16 the performance of maps to mean?

17 A Assessing? Well, I guess just whether a map is more
18 or less favorable to your political position, I guess.

19 Q Did your assessment of maps include the racial or
20 ethnic makeup of districts?

21 A Yes.

22 Q Did it include the partisan makeup or lean of
23 districts?

24 A Yes.

25 Q Did it include the electoral performance of

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1 legislative districts?

2 MS. GOLDMAN: Objection, vague.

3 A Yes.

4 Q (By Ms. Leeper) Did it include specific election
5 results for particular elections?

6 A Yes.

7 Q Okay. So now that we've established what assessing
8 maps means to you, you said that you were involved with
9 assessing legislative district maps drawn for
10 commissioners; correct?

11 A Um-hmm.

12 (Reporter request to answer verbally.)

13 A Yes. Sorry.

14 Q Did you assess any legislative district maps that
15 were drawn or submitted by the public?

16 A Yes.

17 Q Do you recall which maps?

18 A Not particularly. Probably -- No. Sorry.

19 Q How many publicly submitted maps would you say that
20 you assessed?

21 A A dozen.

22 Q Were you involved with receiving or reviewing
23 community input or about public comments submitted to the
24 commission?

25 A Yes.

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1 Q What was your process of reviewing public comments
2 and input?

3 A I would sit in on the public hearings and read
4 the -- as many of the emails that came into the public
5 comment email as possible.

6 Q Did you pass on the information that you got doing
7 that to Commissioner Fain?

8 A No.

9 Q Who did you pass that information on to?

10 A Nobody, really. I mean, I suppose we -- You know --
11 Yeah, nobody that I remember. Sorry.

12 Q How did you use the information that you received in
13 that process?

14 MS. GOLDMAN: Objection, vague.

15 A I guess to see if our maps could be improved based
16 on whatever the criticism was being offered by the
17 comment.

18 Q (By Ms. Leeper) Did you prioritize a certain type
19 of public comment or input?

20 MR. HUGHES: Objection, vague.

21 A No.

22 Q (By Ms. Leeper) Did you ever attend meetings of the
23 public as a representative of the commission or a
24 commissioner?

25 A No. Oh, I did -- I did go to a tribal consultation.

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1 Is that a meeting with the public?

2 Q Yes. What tribal consultation was that?

3 A With the Yakama Nation.

4 Q Did you attend that consultation as a representative
5 of Commissioner Fain?

6 A No, not really. Well, -- I mean no.

7 Q Who were you representing at that?

8 A The Republican caucus.

9 Q Did you ever communicate with stakeholders, such as
10 legislators, party officials or community leaders, as a
11 representative of the commission?

12 A Did I what?

13 Q Did you ever communicate with stakeholders in the
14 redistricting process, such as legislators, party
15 officials or community leaders, as a representative of the
16 commission?

17 A No.

18 Q How about as a representative of Commissioner Fain?

19 A No.

20 MS. LEEPER: Okay. So I think now is a
21 good time for a break.

22 THE WITNESS: Okay.

23 MS. LEEPER: If you guys can have that
24 conversation --

25 We can go ahead and go off the record.

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1 MR. HUGHES: Sorry. Before we go off the
2 record can I just raise one issue?

3 MS. LEEPER: Yes.

4 MR. HUGHES: Could I propose that with
5 respect to objections, an objection for one is an
6 objection for all so we don't have to join objections and
7 take time doing that?

8 MS. LEEPER: I feel like that's a
9 discussion among all of you, and I think I'd like to have
10 that discussion with my counsel team as well; and let's
11 come back and have that after the break, the decision.

12 MS. WAKNIN: Well, why don't we take a
13 20-minute break, because I know that you have to speak
14 with your client.

15 MS. LEEPER: Yeah, that's --

16 MS. GOLDMAN: A 20-minute break?

17 MS. LEEPER: No, hold on.

18 So let's go ahead and go off the record. Thanks.

19 (Discussion off the record.)

20 (Break 10:00 a.m. to 10:15 a.m.)

21 MS. LEEPER: We're back on the record.

22 Great.

23 Q (By Ms. Leeper) Mr. Campos, there's just a few
24 questions before we get into that matter that I'm going to
25 go ahead and just review really quickly.

1 You mentioned earlier that you had read the
2 Complaint in this matter.

3 Why did you read the Complaint?

4 MS. GOLDMAN: Objection. Based on the
5 attorney-client privilege, I'm instructing you not to
6 answer.

7 Q (By Ms. Leeper) Okay. So let's return to some
8 questions to do with James Crandall.

9 Are you represented by Mr. Crandall?

10 A No.

11 Q In conversations about redistricting who has been
12 present in your conversations with Mr. Crandall?

13 A Who has been present?

14 Q Besides yourself and Mr. Crandall.

15 A I -- Jim Troyer.

16 Q Anyone else?

17 A Could you repeat the question?

18 Q Who else has been present in conversations that
19 you've had with Mr. Crandall related to redistricting?

20 A Maybe Anton.

21 Q And anyone else that you remember?

22 A Jim Troyer, maybe.

23 Q In what capacity was Mr. Crandall involved in the
24 2021 redistricting process?

25 A Again, he was the lead caucus staffer on government

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1 operations and elections, state government committee. I'm
2 not quite sure what the formal name is.

3 (Court reporter request to speak up and clarification.)

4 Q And for someone who doesn't know anything about what
5 that job description is, how does that intersect with
6 redistricting?

7 A It covers -- That committee oversees elections, the
8 Secretary of State, a lot of the government agency
9 functions for that. And he's a staffer for that, so --
10 If there were a redistricting bill, it would likely
11 go through that committee.

12 Q And in particular what was Mr. Crandall doing in the
13 2021 redistricting cycle where it intersected with your
14 work?

15 A So he was just aware of redistricting and helping --
16 not helping, but he would need to be apprised of what we
17 were asking for in terms of dollars and FTE to staff the
18 thing.

19 And then we just wanted to have somebody else
20 involved in case I got hit by a bus.

21 Q Did you ever send Mr. Crandall any draft maps?

22 A Did I ever send him draft maps? Probably.

23 Q Did Mr. Crandall ever comment on draft maps?

24 A Yes.

25 Q Do you recall Mr. Crandall making any comments as it

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1 related to Legislative Districts 14 or 15?

2 MS. GOLDMAN: And I'm going to counsel you
3 here to the degree that he provided any legal advice
4 regarding maps, --

5 MS. LEEPER: Now, I would like to say that
6 --

7 MS. GOLDMAN: May I finish my objection --

8 MS. LEEPER: Yes, you may.

9 MS. GOLDMAN: -- and my instruction?
10 I'm going to counsel you to the degree that he was
11 providing you any legal advice regarding maps that you
12 asked him to review or that he reviewed, I'm going to
13 instruct you not to answer.

14 Q (By Ms. Leeper) And I would like to say that you
15 have said you're not represented by Mr. Crandall, so to
16 the extent that it was in a legislative or policy role,
17 that you do need to answer the question.

18 A Fourteen and 15 specifically, not that I recall.

19 Q Do you recall anything specifically regarding the
20 Yakima Valley area?

21 MS. GOLDMAN: Same instruction.

22 A Do I recall comments about the Yakima Valley?

23 Q (By Ms. Leeper) (Nodded.)

24 A Yes.

25 Q What are the comments that you recall?

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1 A I'm sorry. I know he had comments. What they were
2 I don't remember. Sorry.

3 Q But you do recall specifically he had comments about
4 the Yakima Valley area?

5 A Likely, yes.

6 Q How did Mr. Crandall give you information regarding
7 the maps?

8 A We talked about it.

9 Q Did you have any written communication with him?

10 A Probably emails, but -- and likely some texts, but
11 nothing I remember specifically.

12 Q Do you recall any conversation with Mr. Crandall
13 specifically with regards to Latino voters in the Yakima
14 Valley area?

15 MS. GOLDMAN: And I'm going to just have a
16 continuing instruction to you, Mr. Campos, regarding
17 communications that you had with Mr. Crandall. To the
18 degree that you were seeking legal advice or that
19 Mr. Crandall was providing legal advice, I'm instructing
20 you not to answer.

21 To the degree that communications were outside of
22 that scope, you may answer.

23 MS. LEEPER: Ms. Goldman, I do believe
24 you've made that instruction very clear to your client.

25 MS. GOLDMAN: And Counsel, I am entitled to

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1 inform my client and advise my client as I deem
2 appropriate on the attorney-client privilege without your
3 permission.

4 A And the question was?

5 Q (By Ms. Leeper) You know, to be completely honest,
6 I lost it.

7 MS. LEEPER: Could you read it back,
8 please.

9 THE REPORTER: "Do you recall any
10 conversation with Mr. Crandall specifically with regards
11 to Latino voters in the Yakima Valley area?"

12 A Not specifically, no.

13 Q (By Ms. Leeper) Did you discuss the redistricting of
14 Legislative Districts 14 or 15 in the 2021 redistricting
15 process with any legislators?

16 A Yes.

17 Q Which ones?

18 A The ones residing there.

19 Q Could you name them out?

20 A Senator King. That's the only one I recall
21 specifically.

22 Q Do you recall having conversations with Honeyford?

23 A No.

24 Q Did you have any conversations about redistricting
25 with Alex Ybarra?

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1 A No.

2 Q When did your conversation with Curtis King occur?

3 A I don't remember.

4 Q Do you recall if you spoke with him on more than one
5 occasion?

6 A About redistricting? Yes.

7 Q How many times would you say that you spoke with him
8 regarding that?

9 A Three.

10 Q And how did that --

11 A I would guess.

12 Q How did that communication occur?

13 A He called me, I think.

14 Q Did you ever text with Mr. King regarding the
15 redistricting --

16 A No.

17 Q -- in 2021?

18 A No, I don't think so.

19 Q Did you ever have emails with him?

20 MS. GOLDMAN: Regarding the redistricting?

21 A I would -- probably sent him a map or two, yes.

22 Q (By Ms. Leeper) Do you recall if he commented on the
23 map?

24 A No.

25 Q Do you recall at what point you sent Senator King

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1 maps?

2 A Well, I shouldn't -- He wanted us -- Do I --

3 What was the question, do I recall --

4 Q Do you recall about when you sent him those maps?

5 A No, I don't remember.

6 Q What was the content of your conversations with

7 Mr. King regarding Legislative Districts 14 and 15?

8 A He wanted some of his old area back.

9 Q And when you say old area, what do you mean?

10 A An area that was no longer in the proposed map. I
11 don't remember which one.

12 Q Do you recall what area he wanted back?

13 A Northwest Yakima area.

14 Q Anything else?

15 A No.

16 Q Are you aware of any conversations that
17 Commissioner Fain had discussing redistricting of
18 Legislative Districts 14 or 15 with any legislators?

19 A No, not that I remember.

20 Q Did you discuss the redistricting of Legislative
21 Districts 14 or 15 with any other commissioner or
22 commission staffer?

23 A Probably with Commissioner Graves in a general
24 meeting, I'm guessing.

25 Q How about with any staffers?

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1 A No.

2 Q Did you ever speak with Anton Grose about the
3 legislative redistricting of 14 or 15?

4 A Yes.

5 Q Did you ever speak with Osta Davis regarding the
6 redistricting of Legislative Districts 14 or 15?

7 A Probably.

8 Q Did you ever speak with Ms. Dominique Meyers about
9 the Legislative Districts 14 or 15?

10 A I doubt it.

11 Q How about Ali O'Neil?

12 A Again, I don't think so.

13 Q You said that you think you may have spoken with
14 Commissioner Graves. To your recollection when did that
15 communication occur?

16 A I don't know.

17 Q Do you remember any content of discussions with
18 Commissioner Graves about Legislative Districts 14 or 15?

19 A Not specifically, no.

20 Q When did your communications with Anton Grose about
21 Legislative Districts 14 or 15 occur?

22 A About the same time. I don't know.

23 Q What is about the same time?

24 A The same time I don't remember having it with
25 Commissioner Graves.

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1 Q So you don't recall?

2 A I don't recall.

3 Q Okay. Do you recall how you had those
4 communications?

5 A Probably --

6 MS. GOLDMAN: Objection as to form.

7 A Probably in person.

8 Q (By Ms. Leeper) Do you recall if you had any emails
9 regarding Legislative Districts 14 or 15?

10 A With who?

11 Q With Grose.

12 A Maybe. No, I don't remember.

13 Q What was the content of the discussion regarding
14 Legislative Districts 14 or 15 with Grose?

15 A About where to put the line.

16 Q Were there any particular inclinations discussed
17 about where to put the lines?

18 A Well, mostly about the tribal reservation line.

19 Q You say mostly. What else about?

20 A The municipal boundaries, county boundaries.

21 Q Do you recall, other than the ones that we've
22 discussed so far, any communications with party officials
23 that you had regarding the redistricting of Legislative
24 Districts 14 or 15?

25 A No.

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1 Q Do you recall any conversations that
2 Commissioner Fain had regarding -- with party officials
3 regarding Legislative Districts 14 or 15?

4 MS. GOLDMAN: Objection, calls for
5 speculation.

6 A No.

7 Q (By Ms. Leeper) Were you present for any
8 conversations between the commissioners or any subset of
9 the commissioners regarding the redistricting of
10 Legislative Districts 14 or 15?

11 MR. STOKESBARY: Objection, calls for
12 speculation.

13 A Yes.

14 Q (By Ms. Leeper) Which commissioners were present for
15 that communication?

16 A Well, probably Fain and Graves.

17 Q And on how many occasions would you say that you
18 were present for conversations between Commissioners Fain
19 and Graves that involved the redistricting of Legislative
20 Districts 14 or 15?

21 A I don't remember.

22 Q Do you remember the content of those discussions?

23 A No, not specifically.

24 Q Did Commissioner Fain ever express to you
25 preferences regarding the redistricting of Legislative

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1 Districts 14 or 15?

2 MS. GOLDMAN: Objection as to form.

3 MR. STOKESBARY: Objection as to vagueness.

4 A Yeah, likely.

5 Q (By Ms. Leeper) Do you recall what Commissioner Fain
6 told you about his preferences with Legislative District
7 14?

8 A No.

9 Q How about Legislative District 15?

10 A No.

11 Q Did you or Commissioner Fain have any recurring or
12 regularly scheduled meetings regarding redistricting?

13 A Yeah.

14 Q With whom?

15 A Senator Fain.

16 Q How often did you meet with Senator Fain?

17 A I want to say maybe for a while every week.

18 Q And roughly what period would you say you had weekly
19 meetings with him?

20 A During the summer.

21 Q Did those continue into the fall?

22 A No. Well, no, I don't think so.

23 Q Did you attend any regularly scheduled or recurring
24 meetings with Commissioner Fain and any other parties?

25 A Well, yeah.

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1 Q Could you list those out as well?

2 A From what I remember, Commissioner Graves -- No.

3 Anton, Commissioner Graves, James Crandall.

4 Q Okay.

5 MS. WAKNIN: Could you speak a little bit
6 louder?

7 THE WITNESS: Sure.

8 MS. WAKNIN: Thank you.

9 MS. LEEPER: Thank you.

10 THE WITNESS: I'll try.

11 Q (By Ms. Leeper) At that regularly scheduled meeting
12 do you recall Afton Swift also attending?

13 A He may have been at one. I don't remember. Yeah,
14 he was at one, at least.

15 Q And who is Afton swift?

16 A He was -- I'm not sure.

17 Q What did you understand his job to be?

18 A He's a political consultant for the Republicans, and
19 I'm not quite sure. But that's it. That's all I remember
20 for sure.

21 Q Was Matthew Germer also present at some of these
22 meetings?

23 A No, I don't think so.

24 Q Okay. I'm going to pass to you --

25 (Campos Exhibit No. 1 introduced.)

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1 MS. GOLDMAN: Do you have a copy for me?

2 MS. LEEPER: Yes, I do.

3 MS. GOLDMAN: Thank you.

4 One, Jeanne?

5 THE REPORTER: One, yes.

6 MS. LEEPER: So just for the people that
7 are attending virtually, I'm just going to go ahead and
8 drop these in the chat.

9 Q (By Ms. Leeper) Okay. Have you had a moment to
10 review that document?

11 A Yeah. Yes.

12 Q Do you recognize the document in front of you?

13 A Yes.

14 Q And what is it?

15 A It's an email from Paul Graves to a number of people
16 about a meeting.

17 Q And on that chain there's Jeff McMorris, Afton
18 Swift, Commissioner Fain, Matthew Germer, Anton Grose and
19 Paul Graves; right?

20 A Yes.

21 Q And it takes place on February 22nd, 2021?

22 A Yes.

23 Q Okay. So let's talk about Jeff McMorris. What was
24 his role in the redistricting process?

25 A I don't know if I ever -- I don't know.

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1 Q Do you recall attending any of these meetings with
2 Jeff McMorris?

3 A No.

4 Q And who is Afton Swift?

5 A Again, a political consultant for the --

6 MR. STOKESBARY: Objection, asked and
7 answered.

8 Q (By Ms. Leeper) What was his role in the
9 redistricting process?

10 A I'm not real sure.

11 Q And who is Matthew Germer?

12 A I think -- I believe he was a House Republican
13 caucus staffer.

14 Q And what was his role in the redistricting process?

15 A Initially -- Well, he was going to be the staffer
16 for redistricting.

17 Q You say initially. What happened?

18 A He left. He found another job.

19 Q So did he ever attend any of these meetings?

20 A I don't know what he attended.

21 Q Do you recall being at any of these meetings with
22 him?

23 A No.

24 Q So on this thread you, Mr. Swift and
25 Commissioner Fain all confirmed that the time proposed by

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1 Mr. Graves for a bimonthly meeting works for each of you;
2 correct?

3 A Yes.

4 Q Do you recall when the meetings that this email
5 thread is planning began?

6 A No.

7 Q How often did these meetings occur?

8 A None.

9 Q None of these meetings occurred?

10 A Not as far as I remember.

11 Q Do you recall any discussions about redistricting
12 with Jeff McMorris?

13 A Yes.

14 Q And in what context did you have those discussions?

15 MR. STOKESBARY: I'm going to lodge a
16 relevance objection to this line of questioning about this
17 email.

18 A I believe it was a phone call.

19 Q (By Ms. Leeper) Did he express any preferences
20 regarding Legislative Districts 14 or 15?

21 A I don't recall.

22 Q Do you recall any discussions regarding Legislative
23 Districts 14 or 15 with Afton Swift?

24 A No.

25 Q Okay. Sorry. I'm just going to minimize this.

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1 Okay. Did you take any steps during the 2021
2 redistricting process to learn about the needs of the
3 Latino community in the Yakima County and Pasco region?

4 MR. STOKESBARY: Objection as to form.
5 Objection as to vagueness. Compound question.

6 A I'll say yes.

7 Q (By Ms. Leeper) What steps did you take to learn
8 about the needs of the Latino community in the Yakima
9 County and Pasco region?

10 A I attended the public outreach meetings and read the
11 comments received at the public comment email address.

12 MR. HUGHES: Sorry I missed it, but
13 objection, compound.

14 Q (By Ms. Leeper) Did you meet with leaders and
15 advocates from the Latino community in the Yakima County
16 and Pasco region?

17 MR. HUGHES: Same objection.

18 A Not that I remember.

19 Q (By Ms. Leeper) What requests did you receive from
20 the Latino community in the Yakima County and Pasco
21 region?

22 MR. HUGHES: Same objection.

23 MS. LEEPER: Really quickly, so I'm just
24 referring to the region that covers Yakima Valley and
25 Pasco.

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1 MR. HUGHES: Yeah. So my objection is the
2 compound, that you're asking about the Yakima Valley
3 region and the Pasco region.

4 MS. LEEPER: And so I'm just going to --
5 This is an objection about the scope of the geography I'm
6 asking about?

7 MR. HUGHES: It was initially that you're
8 potentially asking multiple questions, depending on how
9 Mr. Campos understands the question. So I'm sorry, I'm
10 not trying to be difficult.

11 MS. LEEPER: Yeah. No, no. Of course,
12 yeah.

13 MR. HUGHES: I'll take a standing objection
14 to this line of questions if that works for you.

15 MS. LEEPER: Yeah, that sounds good.

16 MR. HUGHES: Okay. Thanks.

17 Q (By Ms. Leeper) So going back in, what requests did
18 you receive from the Latino community in the Yakima County
19 area?

20 MS. GOLDMAN: Objection, asked and
21 answered.

22 A There was a request to meet -- I forget the group's
23 name. Oh, Redistricting for Justice for Washington asked
24 for a meeting, so we tried to set that up.

25 Q (By Ms. Leeper) Okay. I'll return to that in a

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1 second.

2 A Okay.

3 Q Other than the request for a meeting, do you recall
4 any specific requests that you received regarding
5 Legislative Districts 14 and 15 from the Latino community
6 in the Yakima County and Pasco region?

7 MR. STOKESBARY: Objection as to vagueness
8 with regard to what is meant by the Latino community.

9 MS. WAKNIN: Counsel, I'd like to remind
10 you no speaking objections.

11 Form or foundation. Thank you.

12 Q (By Ms. Leeper) I'll go ahead and ask it again.

13 A Thank you.

14 Q What requests did you receive, other than the one
15 that you've mentioned, from the Latino community in the
16 Yakima County and Pasco region?

17 A None that I remember.

18 Q Do you recall any public comments that came in
19 making requests regarding the Latino community's needs in
20 the Yakima County and Pasco region?

21 A Do I recall any public -- Yeah.

22 Q And what was the comment of someone?

23 A I think it was a lot having to do with what was
24 being said in the public hearings about the CVAP
25 population percentage.

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1 Q And what was being said?

2 A That it wasn't high enough on a lot of maps.

3 Q When you say not high enough, was there a specific
4 request regarding the CVAP population?

5 MS. GOLDMAN: Objection as to form,
6 vagueness.

7 A Not that I remember.

8 Q (By Ms. Leeper) Do you recall ever meeting with the
9 Redistricting Justice for Washington Coalition?

10 A No.

11 MS. LEEPER: Okay. Let's go ahead and mark
12 this Exhibit 2. Thank you.

13 (Campos Exhibit No. 2 introduced.)

14 MS. LEEPER: Here you go.

15 Are you good with just looking at the PDF version?

16 Is that -- or would you like a hard copy?

17 MR. HUGHES: I would prefer paper. Sorry.

18 MS. LEEPER: No, no worries at all.

19 Q (By Ms. Leeper) Have you had a moment to review?

20 A Yes.

21 Q Okay. Do you recognize the document in front of
22 you?

23 MR. STOKESBARY: I'm sorry, Ms. Leeper.

24 Are you able to upload this to Zoom again?

25 MS. LEEPER: Yes, absolutely.

1 MR. STOKESBARY: I apologize. I thought
2 you were doing that when you were --

3 MS. LEEPER: Oh, no worries.

4 MR. STOKESBARY: I should have asked
5 earlier. I'm sorry.

6 MS. LEEPER: No, I meant to.

7 One second. I'm just going to make sure that I am
8 sending you the proper document.

9 MR. STOKESBARY: Okay. Got it. Thank you
10 very much.

11 MS. LEEPER: Great. No problem.

12 Q (By Ms. Leeper) Okay. Do you recognize the document
13 in front of you?

14 A Yes.

15 Q What is it?

16 A It's a request for a meeting. Yeah, a request for a
17 meeting.

18 Q Okay. And this email thread is from June 11th,
19 2021; correct?

20 A Yes.

21 Q And it includes an original message sent from
22 Margot Spindola to you and Anton Grose; correct?

23 A Yes.

24 Q And then your email to Mr. Grose regarding
25 scheduling a meeting for Ms. Spindola at the end of June;

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1 right?

2 MS. GOLDMAN: Objection, misstates the
3 document.

4 Q (By Ms. Leeper) When you say, "Nothing urgent, since
5 it sounds like they want to aim for the end of June, but
6 if there are any particular times that you would prefer,
7 just let me know," what are you referring to?

8 MS. GOLDMAN: Objection.

9 MR. STOKESBARY: Objection.

10 MS. GOLDMAN: He's not saying that.

11 MS. LEEPER: Oh, withdrawn. Excuse me.

12 Q (By Ms. Leeper) So then it includes your email,
13 Mr. Grose's email to you regarding scheduling a meeting
14 with Ms. Spindola at the end of June; correct?

15 A Yes.

16 Q Who is Margot Spindola?

17 A My understanding is that she represented Re --
18 whatever the group's name was, Washington Redistrict
19 Justice -- Redistricting Justice Coalition.

20 Q Now, if you look down at Ms. Spindola's message she
21 thanks you and Anton for attending the meeting with them
22 on June 11th.

23 Do you recall attending the June 11th meeting with
24 Ms. Spindola?

25 A No, not really. I -- No.

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1 Q So you have no recollection of what was discussed at
2 that meeting?

3 A No. If it was a meeting, it was a meeting about
4 meeting is my recollection.

5 Q But you have no recollection --

6 A No.

7 Q -- of that meeting?

8 A Not really.

9 Q Do you have any recollection of meeting again with
10 Ms. Spindola or a representative of the coalition?

11 A No.

12 Q It says here that Ms. Spindola is a staffer at the
13 Latino Community Fund. Do you ever recall meeting again
14 with any representatives from the Latino Community Fund?

15 A No.

16 MS. LEEPER: I'm going to give you guys a
17 new document here. So I'm going to mark this as
18 Exhibit 3; correct?

19 THE REPORTER: That is correct.

20 (Campos Exhibit No. 3 introduced.)

21 MS. GOLDMAN: And do you have copies,
22 Counsel?

23 MS. LEEPER: Yes, I do.

24 Here you go. And I will drop it in chat.

25 Q (By Ms. Leeper) Have you had time to review the

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1 document?

2 A Yes.

3 Q Do you recognize the document in front of you?

4 A Yes.

5 Q What is it?

6 A It's an email from me to Commissioner Fain about
7 presenting at a caucus retreat.

8 Q And this whole email thread is taking place on
9 June 24th, 2021; correct?

10 A Yes.

11 Q In the email at the top of the first page of the
12 document I've handed you you sent Commissioner Fain five
13 attachments.

14 Can you briefly list for me what each of those are?

15 A I don't see five attachments. I'm sorry.

16 Q Just right at the top where it says attachments.

17 A Oh, sorry.

18 Let's see. The draft 0624 Talking Points, a Word
19 document. A PDF file of the 2020 deviation by legislative
20 and congressional districts. 2020 general election by
21 legislative district and county. An OFM PDF on race and
22 ethnicity by legislative district 2020, and a
23 redistricting update June 24, 2021.

24 Q And that redistricting update is a PowerPoint
25 document; correct?

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1 A Yes.

2 Q Do you recall creating or editing a PowerPoint
3 presentation to be presented at the SRC retreat?

4 A Yes, I do now.

5 Q And does this appear to be the email sending that
6 PowerPoint presentation to Commissioner Fain?

7 A It appears to be.

8 Q Did Commissioner Fain approve that PowerPoint
9 presentation?

10 MS. GOLDMAN: Objection as to form,
11 vagueness.

12 Q (By Ms. Leeper) Did Commissioner Fain ultimately
13 give that PowerPoint presentation at the SRC retreat?

14 A The PowerPoint presentation was available to him.
15 What he actually talked about probably didn't follow the
16 PowerPoint.

17 Q And this says SRC Caucus Retreat. Can you tell me
18 what that is?

19 A It's a meeting of the Republican members of the
20 Senate away from Olympia.

21 Q Okay. I'm going to give you what's going to be
22 marked as Exhibit 4.

23 (Campos Exhibit No. 4 introduced.)

24 Q Have you had a moment to review --

25 A Yes.

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1 Q -- the document?

2 And from now on I'll just say whenever you're done
3 reviewing the document, just let me know and I'll go ahead
4 and ask my questions from there. That will streamline
5 things a bit.

6 So I'll represent to you that this is the attachment
7 from the email that you just looked at, the last one, the
8 PowerPoint presentation.

9 Do you recognize this document?

10 A Yes.

11 Q What is it?

12 A It's a PowerPoint presentation about the
13 redistricting process in 2021.

14 Q I'd like to direct your attention to the fourth
15 slide of the PowerPoint presentation. On your handout
16 that is the middle right. And I apologize, I know that
17 font is quite small.

18 What was the purpose of this slide?

19 A What was the purpose? To inform the members what
20 was being said by the various committees during public
21 hearings.

22 Q And on what basis did you have the assertion that
23 this slide contains what's being said?

24 MS. GOLDMAN: Objection as to form, vague.

25 A What basis? The comments submitted to the

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1 redistricting commission.

2 Q (By Ms. Leeper) So this was a summary of the
3 comments submitted to the redistricting commission?

4 A It was a summary, yes.

5 Q Did it also include things that were said at public
6 meetings?

7 A Well, that's what's captured in the -- Yeah, I think
8 so.

9 Q So under communities of interest on the what's being
10 said slide it reads, "Minority communities should be
11 able -- should be together and able to elect a candidate."

12 Do you see that?

13 A Um-hmm.

14 (Reporter request to answer verbally.)

15 A Yes. Sorry.

16 Q That was based then on public comments that you were
17 receiving; yes?

18 A Public comments were made at a public hearing,
19 comments emailed to the commission.

20 Q And did you hear that said by Latinos in Washington?

21 MR. HUGHES: Objection, foundation.

22 A Yes. Yes.

23 Q (By Ms. Leeper) Did you hear it said by Latinos in
24 the Yakima Valley area?

25 MR. HUGHES: Objection, vague.

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1 MS. GOLDMAN: Objection.

2 A Not that I remember.

3 MS. GOLDMAN: Objection, calls for
4 speculation.

5 Q (By Ms. Leeper) Did you hear it being said by
6 Latinos in the Pasco area?

7 A Not that I remember.

8 MS. GOLDMAN: Calls for speculation.
9 I'm sorry. Go ahead, Andrew.

10 MR. HUGHES: Objection, foundation.

11 MS. GOLDMAN: Objection, calls for
12 speculation.

13 Go ahead and answer.

14 A Not that I remember.

15 Q (By Ms. Leeper) Did the commission have any
16 discussions about the legal requirements for redistricting
17 in Washington?

18 MS. GOLDMAN: Okay. I am going to counsel
19 you here, Mr. Campos, that to the degree that any such --
20 that your answer would convey information to or from an
21 attorney regarding a request for or receipt of legal
22 advice, then I'm going to instruct you not to answer.

23 And I also object, calls for speculation.

24 Please answer if you can.

25 MS. LEEPER: Can you read it back, Jeanne?

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1 THE REPORTER: Sure. "Did the commission
2 have any discussions about the legal requirements for
3 redistricting in Washington?"

4 A Yes.

5 Q (By Ms. Leeper) What legal requirements were
6 discussed?

7 MS. GOLDMAN: Same instructions and same
8 objection.

9 A There was a review by the Attorney General's Office
10 about redistricting in Supreme Court cases.

11 Q (By Ms. Leeper) Do you recall who you spoke with at
12 the Attorney General's Office?

13 A Who --

14 Q Who the commission spoke with.

15 A No. I don't remember their names, no.

16 Q What was the topic of the Supreme Court cases
17 discussed?

18 A I -- I don't know exactly.

19 Q How did those cases relate to legal requirements of
20 redistricting?

21 MS. GOLDMAN: I'm going to instruct you not
22 to answer based on the attorney-client privilege.

23 Q (By Ms. Leeper) Apart from the presentation made by
24 the Attorney General's Office, were any other
25 presentations made to the commission regarding the legal

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1 requirements for redistricting?

2 MS. GOLDMAN: And my instruction carries to
3 the degree that any of your answer would address any legal
4 advice requested or received by the commission, I'm
5 instructing you not to answer.

6 To the degree that the information is outside of
7 that scope, you may answer.

8 A I don't know.

9 Q (By Ms. Leeper) Are you aware of any legal
10 requirements of redistricting arising from Washington
11 state code?

12 MS. GOLDMAN: Objection, calls for a legal
13 conclusion.

14 A Am I aware? Yes.

15 Q (By Ms. Leeper) What requirements are you aware of?

16 MS. GOLDMAN: Objection, calls for a legal
17 conclusion.

18 A The ones stated in the statute.

19 Q (By Ms. Leeper) And do you recall what those are?

20 A Equal in population, compactness, contiguity,
21 communities of interest, electoral competition. There's a
22 fifth one that I don't have. Oh, not dividing municipal
23 subdivisions or governmental subdivisions, I think.

24 Q What do you understand the requirements to be as
25 they relate to communities of interest?

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1 MS. GOLDMAN: Objection, vague, and calls
2 for speculation and for a legal conclusion.

3 A What do I understand?

4 MS. LEEPER: Could you read it back?

5 THE REPORTER: Sure. "What do you
6 understand the requirements to be as they relate to
7 communities of interest?"

8 A So communities of interest should be kept together
9 within the district, if possible.

10 Q (By Ms. Leeper) And what do you understand the term
11 communities of interest to mean?

12 MS. GOLDMAN: Objection, calls for a legal
13 conclusion.

14 A It can be pretty wide and varied.

15 Q (By Ms. Leeper) What might it include?

16 A A town, a city, ethnic groups, different people --
17 people of different -- have an interest in a particular
18 issue or lifestyle, any number of things.

19 Q And what do you understand the requirement to be
20 regarding electoral competition?

21 MS. GOLDMAN: Objection, calls for a legal
22 conclusion.

23 A That each party should have a good chance of
24 winning.

25 Q (By Ms. Leeper) Were there any public hearings or

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1 meetings regarding the legal requirements of
2 redistricting?

3 A Were there any meetings?

4 Q Public hearings or meetings about the legal
5 requirements.

6 A Yes.

7 Q When?

8 A I have no idea. I don't remember.

9 Q What was covered?

10 A The Attorney General's Office gave a broad overview
11 of a number of things in one of the public hearings.

12 Q Do you recall what --

13 A I don't know. I'm sorry. One of the commission
14 meetings. I don't know whether it was public or not.

15 MS. GOLDMAN: I'm sorry. Could you read me
16 back his answer, please.

17 THE REPORTER: Yes. "I don't know. I'm
18 sorry. One of the commission meetings. I don't know
19 whether it was public or not."

20 MS. GOLDMAN: So I'm going to again counsel
21 you to the degree that it was not public and the Attorney
22 General's Office was providing advice to the commission,
23 I'm instructing you not to answer.

24 Her question concerned a public meeting.

25 A Right. The Attorney General provided guidance at a

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1 commission meeting. I don't recall whether it was an
2 outreach meeting or not.

3 Q (By Ms. Leeper) And aside from that meeting, do you
4 recall any hearings or public meetings that touched on the
5 legal requirements of redistricting?

6 A Not that I remember.

7 Q Do you know anything about the Federal Voting Rights
8 Act?

9 MS. GOLDMAN: Objection, calls for a legal
10 conclusion.

11 A I know it exists.

12 Q (By Ms. Leeper) What is your understanding of what
13 is required by the federal VRA?

14 MS. GOLDMAN: Objection, calls for a legal
15 conclusion.

16 A I haven't looked. I don't know.

17 Q (By Ms. Leeper) Do you have any understanding of
18 whether the Federal Voting Rights Act applied to areas in
19 south central Washington?

20 MS. GOLDMAN: Objection, calls for a legal
21 conclusion, and calls for speculation.

22 MR. HUGHES: And vague.

23 (Reporter request for clarification.)

24 MR. HUGHES: And vague. Sorry.

25 A What was my understanding of it?

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1 Q (By Ms. Leeper) Um-hmm.

2 A I don't have much of one.

3 Q What steps, if any, did the commission take to
4 assess the compliance of proposed legislative district
5 maps with the requirements of the Voting Rights Act?

6 MS. GOLDMAN: Mr. Campos, I'm going to
7 instruct you to the degree that the answer to that
8 question concerns requests for legal advice or legal
9 advice to the commission, I'm instructing you not to
10 answer. As to anything else you should answer.

11 MR. HUGHES: I'm going to object on
12 foundation grounds.

13 A I don't know what the commission did in those terms.

14 Q (By Ms. Leeper) Aside from receiving legal advice,
15 what steps, if any, did you take to assess the compliance
16 of proposed legislative district maps with the
17 requirements of the Voting Rights Act?

18 A I don't remember taking any.

19 Q Did you hire or otherwise consult or meet with
20 anyone to assess the requirements of the Voting Rights Act
21 as they relate to the Washington legislative districts?

22 A No.

23 Q Did the commission hire or otherwise consult or meet
24 with anyone to assess the requirements of the Voting
25 Rights Act as they relate to the Washington legislative

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1 districts?

2 MS. GOLDMAN: Calls for speculation.

3 MR. HUGHES: And foundation.

4 A I don't know what they did.

5 Q (By Ms. Leeper) To your knowledge did Commissioner
6 Fain hire or otherwise consult or meet with anyone to
7 assess the requirements of the Voting Rights Act as they
8 related to the Washington legislative districts?

9 A I don't know what he did.

10 Q Do you recall a research presentation released by
11 Dr. Matt Barreto on October 19th, 2021 related to the 2021
12 redistricting in Washington?

13 MR. HUGHES: Object to form.

14 A I know it exists.

15 Q (By Ms. Leeper) Did you ever review that release?

16 A Not that I remember.

17 Q Did you ever discuss that report with
18 Commissioner Fain?

19 A Not that I remember.

20 Q Did you ever discuss that report with any other
21 commissioners?

22 A Not that I remember.

23 Q With any commission staff?

24 A No.

25 Q Did you ever consult with anyone regarding that

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1 report?

2 A No.

3 Q Did the Republican caucus ever consult with anyone
4 regarding that report?

5 MS. GOLDMAN: Objection, calls for
6 speculation, and lack of foundation.

7 A I have no idea what they did.

8 Q (By Ms. Leeper) We discussed this earlier, and I'm
9 just confirming that you only used Dave's to draw and
10 assess the performance of legislative district maps; is
11 that correct?

12 A No.

13 Q No?

14 A I used Dave's -- No.

15 Q What platforms did you use to draw and assess the
16 performance of legislative maps?

17 A I forget what it's called now.

18 Autobound, their redistricting software.

19 Q Is that Edge?

20 A Yes, Edge.

21 Q Did you also use Dave's Redistricting app to draw
22 maps?

23 A Very little.

24 Q What metrics are available to view on Edge?

25 A On Edge? Population, demographics. And I brought

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1 in election results.

2 (Reporter request for clarification.)

3 A I added election results.

4 Q When you say demographics, what is that referring
5 to?

6 A Race and ethnicity.

7 Q Did you include -- Did that include the voting age
8 population?

9 A No.

10 Q How about the citizen voting age population?

11 A I'm sorry. It did include the voting age
12 population, yes.

13 Q How about the citizen voting age population?

14 A No.

15 Q So on Edge you were only able to view the voting age
16 population; is that correct?

17 A Yes.

18 Q You said that you added in election results. Which
19 elections?

20 A 2016, a few races in 2016.

21 Q I'll stop you there. Which races, to your
22 recollection?

23 A Definitely the U.S. Senate race.

24 Q Do you recall anything else from 2016?

25 A Not -- No.

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1 2020 would have been -- whatever the gubernatorial
2 races were, those years.

3 Q And do you recall any other races that you inputted
4 from 2020?

5 A Well, it would have been all the top eight, the
6 nine -- the nine statewide elected officials. I think I
7 tried to put in the State Senate and State House races.

8 Q You say you tried to. Did you succeed?

9 A Yeah. Not very well, but yeah.

10 Q Why did you include the State Senate and House
11 races?

12 A Because our members wanted to know how they would
13 have done as opposed to somebody else.

14 Q And why did you include the races you did include
15 from 2020?

16 A Why did I include those?

17 Q Yes.

18 A As a comparative.

19 Q And how about 2016?

20 A I'm sorry, I'd have to look at it. I don't remember
21 exactly.

22 Q You mentioned that you did very little, but you did
23 at times use Dave's Redistricting app to assess, draw and
24 assess maps; is that correct?

25 A Yeah.

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1 Q What metrics are available to view on Dave's?

2 A I don't remember. I mean, one that wasn't available
3 to me in Edge was the CVAP population, so --

4 Q Did you use the CVAP when you were drawing maps with
5 Dave's?

6 A Only to input the map and see what it was.

7 Q How often when you had drawn a map did you input it
8 into Dave's to see that the CVAP was?

9 A I want to say once or twice, maybe. Once.

10 Q For what map?

11 A I don't know. I have no idea.

12 Q Did you ever look at the metrics regarding partisan
13 lean of districts on Dave's?

14 A Did I ever -- Yeah. Yes.

15 Q Are there certain functions other than CVAP that you
16 could do in one platform and not the other?

17 A Are there functions I could do in one and not the
18 other? Yes.

19 Q And what are those?

20 A Dave's has the CVAP -- had the 2019, I think, CVAP
21 number in it. That was all for me.

22 Q And you said you predominantly used Edge to create
23 and assess draft maps; is that correct?

24 A Yes.

25 Q Why was that?

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1 A It worked well for me.

2 Q Was there a particular election which was considered
3 the primary marker for performance of legislative
4 districts?

5 MS. GOLDMAN: Objection as to form.

6 A Can you say it again?

7 Q (By Ms. Leeper) Yeah. Was there a particular
8 election which was considered the primary marker for
9 performance of legislative districts?

10 MS. GOLDMAN: Objection, vague.

11 A Yeah.

12 Q (By Ms. Leeper) What was that election?

13 A The treasurer's race.

14 Q Is that the 2020 treasurer's race?

15 A Yeah, I believe so.

16 Q How did the 2020 treasurer's race come to be the
17 primary election used to assess the performance of
18 legislative districts?

19 A The commission -- commissioners needed a race to be
20 able to bargain with, and that's the number they -- that
21 was the race they used.

22 Q Were you present in any of the conversations about
23 which race might be used?

24 A Yeah.

25 Q Do you recall what the different commissioners'

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1 stances were on which races should be used?

2 A Not specifically, no.

3 Q Do you recall why the 2020 treasurer's race was
4 ultimately selected?

5 A No.

6 Q Do you recall who first --

7 A Wait.

8 Q Oh, no, please continue.

9 A Sorry. Because my -- I think it was because it was
10 a generic race. Nobody knew who the candidates were, and
11 it tended to be one that wouldn't be -- that would just
12 measure the party as opposed to personalities.

13 Q And what are you basing that statement on?

14 A Just conversations we had, I guess, about it.

15 Q And those are conversations with the commissioners?

16 A Amongst -- Yeah.

17 Q And commission staff?

18 A I don't know about what commission staff
19 talked about or had.

20 Q Did Commissioner Fain identify to you his primary
21 considerations for when you were making maps for him?

22 A It was map dependent.

23 Q Did he have any overarching principles or metrics
24 that he cared about?

25 A Not that I remember.

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1 Q Do you recall Commissioner Fain identifying
2 competitiveness as a consideration for redistricting?

3 A Well, yeah.

4 Q Do you recall any conversations that you or others
5 had with Commissioner Fain that you were present for to
6 suggest that competitiveness be one of his considerations?

7 A No, not that I remember.

8 Q Did you conduct analysis of the competitiveness of
9 maps that you drew?

10 A Yes.

11 Q How about maps that were submitted or considered by
12 other commissioners and commission staff?

13 MS. GOLDMAN: Objection as to form, vague.

14 A Yes.

15 Q (By Ms. Leeper) How did you assess the
16 competitiveness of legislative districts?

17 A I would input the map, see the race results, and
18 compare them to the other maps.

19 Q And when you say you would input the map, is that
20 into Edge or Dave's?

21 A Edge.

22 Q Edge. Okay.

23 What were the top eight and top four measures?

24 A Top eight? Oh, the statewide races without the
25 Superintendent of Public Instruction, because that's a

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1 nonpartisan race.

2 And the top four were, I believe, Governor,
3 Secretary of State, Attorney General and Treasurer, I
4 think.

5 Q Okay. I'm going to give you what we are going to
6 mark as Deposition Exhibit 5.

7 (Campos Exhibit No. 5 introduced.)

8 Q Are you ready?

9 A Yes. Sorry.

10 Q No need to apologize.

11 Do you recognize the document in front of you?

12 A Yes.

13 Q What is it?

14 A It's a review of the top eight and top four races,
15 which I misidentified.

16 Q And that's in an email from September 30th, 2021;
17 correct?

18 A Yes.

19 Q Sent from yourself to Commissioner Fain?

20 A Yes.

21 Q What is the attachment to this email?

22 A It's likely a district-by-district breakdown of
23 these same races.

24 Q Does this email capture the races that were
25 ultimately included in the top eight and top four

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1 analysis?

2 A Yes.

3 Q Why were these particular races selected for the top
4 four?

5 A I think two are personality based, and two are kind
6 of less -- Well, I don't know.

7 I don't know why they were. Sorry.

8 Q Why was the treasurer race not included in the top
9 four?

10 A I don't know.

11 Q What range would a district have to be in to be
12 considered competitive under your analysis?

13 A I didn't have an analysis.

14 Q You said earlier that you would look at and assess
15 the competitiveness of legislative districts.

16 Was there a marker for what was considered to be
17 competitive?

18 A If it was -- Not that we ever got to know.

19 Q In your email at the top you'll see that you say,
20 "Here's what has been discussed."

21 What discussions are you referring to?

22 A Discussions about the various maps and how they were
23 forming politically.

24 Q With whom were these discussions?

25 A Generally probably mostly me and Senator Fain. It

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1 could have been others.

2 Q Do you recall by what method those discussions were
3 happening?

4 A In person.

5 Q Had you established and been looking at a different
6 top four before this email was sent on September 30th?

7 A I don't remember.

8 Q Did you conduct any top eight or top four analyses
9 prior to September 30th?

10 A Not that I remember.

11 Q Did you conduct any top eight or top four analyses
12 on any of the maps that were submitted on November 21st?
13 Pardon me, September 21st.

14 A Maps that were submitted on September 21st?

15 Q For instance, Commissioner Fain's map.

16 A Yeah.

17 Q So you submit you conducted top eight and top four
18 analyses on Commissioner Fain's map that was publicized on
19 September 21st?

20 A Oh. So the -- Yeah, the public maps, yeah. We did
21 them all.

22 Q And did you do those analyses before the map was
23 released publicly?

24 A I don't -- I wouldn't have -- No, I doubt it.

25 Q Did you do any analysis of those maps before they

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1 were released, Commissioner Fain's map before it was
2 released to measure competitiveness?

3 A Oh, sure.

4 Q How did you measure competitiveness then?

5 A I would have provided these numbers.

6 Q When you say these numbers, what do you mean?

7 A Top four and top eight.

8 Q So did you conduct top four or top eight analyses of
9 the September 21st Fain map before it was submitted to the
10 public?

11 A Yes.

12 Q And would you have used these top four and top eight
13 metrics?

14 A Yeah.

15 Q Okay. I'm going to hand you what's going to be
16 marked as Deposition Exhibit 6.

17 (Campos Exhibit No. 6 introduced.)

18 MR. HUGHES: Would now be a good time for a
19 break?

20 MS. LEEPER: Let's do it after this
21 exhibit.

22 MR. HUGHES: Okay.

23 MS. LEEPER: Yes.

24 Q (By Ms. Leeper) And just let me know when you've had
25 an opportunity to review it.

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1 A I've reviewed it.

2 Q Do you recognize the document in front of you?

3 A Yes.

4 Q What is it?

5 A It's a memo from Commissioner Fain to the remaining
6 other commissioners discussing the competitors in
7 districts and how to measure those.

8 (Reporter request for clarification.)

9 A The competitiveness of districts and how to measure
10 those.

11 Q Did you create this memo?

12 A No.

13 Q Did you see the memo before it was released to the
14 other commissioners?

15 A Yes.

16 Q Did you edit it?

17 A Yes. Well, I don't remember. I may have. I don't
18 remember.

19 Q Did you run the analysis to create the charts in
20 this memo?

21 A Yes.

22 Q What was the reason for disseminating this memo?

23 A Commissioner Fain had a concern we were discussing
24 around the issues at hand and wanted the other
25 commissioners to be aware that at some point we would have

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1 to start -- they would have to start discussing how to
2 reach an agreement.

3 Q What issues at hand were being discussed around?

4 A Coming to an agreement on districts.

5 Q And anything in particular?

6 A No.

7 Q Do you recall anything in particular that was
8 discussed regarding Legislative Districts 14 and 15?

9 A No.

10 Q Okay. So I'm going to give you a moment to read the
11 fourth paragraph on the first page beginning with, "By
12 ranking all districts."

13 A Okay.

14 Q Do you see where the memo says that
15 Commissioner Fain regularly compared all proposed from
16 each commissioner against the baseline of districts
17 performing between 45 percent and 55 percent in the 2020
18 treasurer's race?

19 A Yes.

20 Q Can you please explain that baseline to me?

21 A Well, it's the results of the treasurer's race would
22 have gotten in each of the proposed maps.

23 Q Are you aware of the logic of setting 45 percent to
24 55 percent of the range as a competitive race?

25 A No.

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1 Q Okay. So let's go ahead and look at the second
2 page, the chart titled, "Walkinshaw offer November 13th at
3 noon."

4 A I'm sorry. Where?

5 Q That chart in the middle of the page there.

6 A Oh, yeah. Okay.

7 Q What is this chart measuring?

8 A The treasurer's race within that 45 to 55 range for
9 a couple of -- for I think Commissioner Walkinshaw's
10 proposal versus the current, what was then the current
11 map.

12 Q And Pellicciotti, that's the 2020 treasurer race;
13 correct?

14 A Yes.

15 Q And Pellicciotti was the Democratic candidate in
16 that race; is that right?

17 A Yes.

18 Q Do you see where draft District 14 is included in
19 the chart? It's right about in the middle.

20 A Yes.

21 Q So Pellicciotti's percentage for Walkinshaw's draft
22 LD 14 is 54.2 percent; correct?

23 MS. GOLDMAN: Objection, misstates the
24 document.

25 Q (By Ms. Leeper) Excuse me, 54.1 percent.

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1 A Right.

2 Q So I'll just go ahead and ask the whole question
3 again.

4 So the Pellicciotti result under Walkinshaw's LD 14
5 is 54.1 percent; correct?

6 A Yes.

7 Q So that district is within Fain's identified
8 competitive range of 45 to 55 percent; correct?

9 A Yes.

10 Q And Pellicciotti would be elected in that district?

11 A Yes.

12 Q Okay. So now let's look at the chart on the third
13 page. It's entitled, "Graves offer November 13th at
14 noon."

15 What is this chart measuring?

16 A The same situation, except for Commissioner Fain's
17 proposal versus the current, what was in the current map.

18 Q Do you see where draft District 15 is included on
19 the chart?

20 A Yes.

21 Q And the Pellicciotti percentage for Graves draft
22 LD 15 is 46.8 percent; correct?

23 A Yes.

24 Q Which means that Pellicciotti would not be elected
25 in Graves LD 15; yes?

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1 A Yes.

2 MS. LEEPER: Okay. Let's go ahead and go
3 off the record.

4 (Discussion off the record.)

5 (Break 11:24 a.m. to 11:36 a.m.)

6 (Mr. Phillip Gordon is now present.)

7 Q (By Ms. Leeper) Mr. Campos, during your work on
8 redistricting you received an article about the white
9 population shrinking; correct?

10 A Yeah.

11 Q Here you go. I'm going to hand you what is going to
12 be marked as Exhibit 7.

13 (Campos Exhibit No. 7 introduced.)

14 MS. LEEPER: Okay. I'll put that in the
15 chat.

16 Q (By Ms. Leeper) Have you had a moment to review it?

17 A Yes. Sorry.

18 Q Do you recognize this document?

19 A Yes.

20 Q What is it?

21 A It's a document that has a -- the malapportionment
22 report, basically --

23 (Reporter request for clarification.)

24

25 A The malapportionment report. The amount of

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1 population in each district that varies from the ideal
2 population.

3 Q Okay. Let's turn to the third page of what I've
4 handed you, and that's an email from August 12th, 2021;
5 correct?

6 A Yes.

7 Q And it contains an article with the headline,
8 "America's White Population Shrank for First Time in U.S.
9 History, Census Data Show."

10 A Yep.

11 Q And it was sent to you by James Troyer; correct?

12 A Yes.

13 Q And I believe we mentioned him earlier, but just for
14 this section who is James Troyer?

15 A James Troyer is the chief of staff of the Republican
16 caucus.

17 Q And it was also sent to it says the SRC, which I
18 think is the Senate Republican Caucus members' email;
19 correct?

20 A Yeah. Yes.

21 Q And the SRC communications team?

22 A Yes.

23 Q And also James Crandall, Kathleen Lawrence.

24 A Yes.

25 Q And who is Kathleen Lawrence?

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1 A Kathleen is the policy director of the Senate
2 Republican Caucus.

3 Q Are you aware of why this article was shared with
4 you?

5 A No.

6 Q Did you find this article pertinent to map drawing?

7 MS. GOLDMAN: Objection as to form.

8 A It shared population data.

9 Q (By Ms. Leeper) Okay. So let's turn to the first
10 page now. You replied all to this email on August 12th,
11 2021; correct?

12 A No. Did I? Oh, yeah, I guess I did. Yes.

13 Q And your response includes a chart depicting the
14 2020 population totals and deviations by legislative
15 district?

16 A Yes.

17 Q Why did you respond to this article with that chart?

18 A I think the article mentioned population data, so I
19 wanted to update the members on their district's 2020
20 population information.

21 Q Did you think the content of this article had
22 particular relevance to any legislative districts?

23 MS. GOLDMAN: Objection as to form.

24 A Yes, likely.

25 Q (By Ms. Leeper) And you also included an attachment

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1 in your email; correct?

2 A Yes.

3 Q And what is that?

4 A That's an Excel spreadsheet of the same information.

5 Q Could you please give me an overview of the types of
6 meetings and activities that you attended that the
7 commission held or undertook between January, 2021 and the
8 release of the commissioners' official proposed maps in
9 September of 2021?

10 MS. GOLDMAN: Objection, compound.

11 MS. LEEPER: I can break it down for you.

12 Q (By Ms. Leeper) What types of meetings that the
13 commission held or undertook -- that the commission held
14 between January, 2021 and the release of the maps in
15 September of 2021 did you attend?

16 A I -- Administrative meetings to set up the
17 commission and staffing. Just -- And then outreach
18 meetings, hearings that were held to receive input.

19 Q How regularly were those outreach meetings held?

20 A I want to say -- They set up a schedule. I want to
21 say every couple of -- every week, depending on the week,
22 but it would be for different areas, as I recall.

23 Q And how frequently did you attend those outreach
24 meetings?

25 A I tried to sit in on all of them. I may have missed

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1 one.

2 Q How frequently did Commissioner Fain attend those --
3 How frequently did Commissioner Fain attend those outreach
4 meetings?

5 A I believe he attended all of them. Maybe he missed
6 one or two. I don't remember. Sorry.

7 Q Okay. So now could you please give me an overview
8 of the types of activities other than meetings that the
9 commission undertook between January of 2021 and the
10 release of the commissioners' proposed maps in September?

11 MR. HUGHES: Objection, vague.

12 MS. GOLDMAN: Objection, foundation. Calls
13 for speculation.

14 And Counsel, I'm not clear if you're asking him that
15 he participated in, --

16 MS. LEEPER: Yes.

17 MS. GOLDMAN: -- or not.

18 MS. LEEPER: That he participated in.

19 MS. GOLDMAN: Because that was not part of
20 your question.

21 MS. LEEPER: Thank you.

22 A Yeah. They weren't a public meeting. Oh, no, we
23 had -- I'm sorry. We did have -- There were additional
24 staff meetings that the executive director wanted that we
25 held. We held them every week. Beyond that, that was all

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1 that I remember.

2 Q (By Ms. Leeper) And what was the nature of the items
3 discussed at those weekly staff meetings?

4 A I think it was trying to get the executive director
5 kind of an idea of what she could expect from
6 commissioners in terms of what she was going to propose,
7 or maybe asking us what she should propose or not in terms
8 of, you know, software, staffing, schedules, that sort of
9 stuff.

10 Q And --

11 A And then not much beyond that, but I don't remember.

12 Q And for what period did you have those weekly
13 meetings?

14 A I think we started them fairly early, probably ran
15 through -- I can't -- I couldn't tell you.

16 Q Would you say starting around February or March?

17 A I would think after sessions, so I think it would
18 have been after March -- I think.

19 Q And did they continue through the end of the
20 redistricting period?

21 A I think through -- Yeah. Yep, I think so.

22 Q On September 21st, 2021 each voting commissioner
23 proposed a legislative map; correct?

24 A September 21st?

25 Q Yes.

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1 A Okay.

2 Q All right. All right. I'm going to go ahead and
3 hand you what we're going to be marking as Deposition
4 Exhibit 8.

5 (Campos Exhibit No. 8 introduced.)

6 Q Before we get into that, just one actual followup
7 question about what we were just talking about. I
8 apologize.

9 At the commission administrative meetings that you
10 attended did the commission discuss the content of the
11 public outreach meetings?

12 MS. GOLDMAN: Objection as to form.

13 A I don't remember.

14 Q (By Ms. Leeper) All right. So let's turn to the
15 document.

16 A Okay.

17 Q Have you had a chance to review it?

18 A Yes.

19 Q Do you recognize this document?

20 A Yeah, I -- I should.

21 MS. GOLDMAN: Counsel, I'm going to object
22 to the document, which -- part of which appears to have a
23 title embossed by the Federal Court, and the other does
24 not; and so it's not clear to me that those documents are
25 one in the same.

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1 MS. LEEPER: Both of them do have the
2 embossing. It's just on the vertical portion rather than
3 the horizontal.

4 MS. GOLDMAN: Oh, okay. Thank you.

5 MS. LEEPER: No problem.

6 MS. GOLDMAN: And so -- And what is page 1
7 of the document?

8 MS. LEEPER: So page 1 is the first -- is
9 the horizontal page.

10 MS. GOLDMAN: No, one says two of three,
11 and the other says three of three. So why --

12 MS. LEEPER: Oh, yes. Sorry. So this is
13 something we actually used as an exhibit, and so I just --
14 that we pulled down from the website at that point, and so
15 I just used that. It just doesn't have the case caption
16 page is what's missing.

17 MS. GOLDMAN: So to be clear, page 1 is
18 just a case caption?

19 MS. LEEPER: It's just the case caption,
20 yes, ma'am.

21 MS. GOLDMAN: Okay. Thank you.

22 MS. LEEPER: Of course.

23 Q (By Ms. Leeper) Okay. So do you recognize this
24 document?

25 A Yes. Yes.

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1 Q And what is it?

2 A It's a depiction of what is Commissioner Fain's
3 proposed legislative district plan.

4 Q And that's the plan that was submitted and
5 publicized on September 21st, 2021; correct?

6 A I'll presume that, yes.

7 Q And this map does not have the Latino majority
8 district by voting age population in the Yakima County and
9 Pasco region; correct?

10 MR. HUGHES: Objection, compound.

11 A I don't --

12 MS. GOLDMAN: Objection, calls for
13 speculation.

14 Q (By Ms. Leeper) Okay. So I'm going to hand you what
15 we're going to be marking as Deposition Exhibit 9.

16 (Campos Exhibit No. 9 introduced.)

17 MR. HUGHES: Should I keep this out or put
18 it away?

19 MS. LEEPER: You can keep that out.

20 Q (By Ms. Leeper) And the text on this is quite
21 small, so if you can't read it let me know and I can
22 screen share this.

23 A Yeah, I can't really read it.

24 Q Okay. Let me go ahead, and I'm going to screen
25 share it on the Zoom. It should be a little bit easier

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1 for you to view.

2 MS. LEEPER: Could we go off the record for
3 one quick moment?

4 MR. HUGHES: Fine with me.

5 (Discussion off the record.)

6 MS. LEEPER: Let's go back on the record.

7 Q (By Ms. Leeper) Okay. So looking down at the bottom
8 of the document that I just showed you, do you see here --
9 I'll go up to the top first.

10 This is a -- Do you recognize this page?

11 A It's a redistricting commission page.

12 Q And this page includes the commission proposed maps;
13 correct?

14 A It contains a description of their maps.

15 Q Okay. And so now looking down at the Joe Fain
16 section, do you see where it says download shapefiles?

17 A Yes.

18 Q All right. So I'll go ahead and stop that.

19 And I'm going to represent to you that plaintiffs'
20 counsel downloaded the shapefiles from that link and then
21 uploaded them to Dave's Redistricting app, and so that's
22 what I'm going to be opening now.

23 A Okay.

24 Q So can you look at your screen? Okay.

25 Do you recognize this map as well?

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1 MS. GOLDMAN: Objection, calls for
2 speculation, lack of foundation.

3 Q (By Ms. Leeper) Can you go ahead and look at the
4 previous Deposition Exhibit 8?

5 A Um-hmm.

6 Q Does this appear to be substantively the same map?

7 A Yes.

8 Q All right. So on Dave's here I'm going to look at
9 Legislative District 5. You can see, and now I'm moving
10 down to the district details. And I'm going --

11 MS. GOLDMAN: Fifteen, you mean?

12 MS. LEEPER: Fifteen, yes. Thank you.

13 Q (By Ms. Leeper) We're looking at Legislative
14 District 15. So we're looking at the Citizen VAP, which
15 is voting age population, 2020.

16 Do you see that there is no Hispanic majority by
17 citizen VAP?

18 A 35.5.

19 Q So is that no Hispanic majority?

20 A Right.

21 Q Okay. And then I'm also going to add in looking at
22 the metric of voting age population for 2020. Oh, sorry.
23 The Zoom faces are blocking my ability to apply. Great.

24 Okay. So what is the 2020 voting age population for
25 Hispanics shown there?

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1 MS. GOLDMAN: And I'm just going to object.

2 I mean, you're manipulating data on a screen that he has
3 not seen before, and you're asking him to read to you or
4 reflect back to you on data that is popping up on the
5 screen.

6 So he can certainly read that information back to
7 you, and I'm going to object to lack of foundation, and
8 calls for speculation.

9 MS. LEEPER: Thank you. And I'd ask you
10 not to make any speaking objections. Thank you.

11 MS. GOLDMAN: I'll make the objections that
12 I deem appropriate.

13 Q (By Ms. Leeper) And what is the Hispanic number seen
14 there?

15 A 48.8 percent.

16 Q And that is not a Latino majority; correct?

17 MS. GOLDMAN: Objection, calls for
18 speculation, lack of foundation.

19 A It's not a majority.

20 Q Okay.

21 (Discussion with court reporter re screen share.)

22 MS. LEEPER: Let's go ahead and mark that
23 as Exhibit 10, and I will provide you with that. I don't
24 have a hard copy.

25 MS. GOLDMAN: For the record can you

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1 explain what Exhibit 10 is?

2 MS. LEEPER: Exhibit 10 would be --

3 Actually, you know what, we don't need to be marking it as
4 an exhibit. It can just be something we looked at
5 together.

6 So no to that.

7 Q (By Ms. Leeper) Okay. Commissioner Fain's
8 September 21st map splits the Latino population in the
9 Yakima Valley across Districts 13, 14, 15 and 16;
10 correct?

11 MR. HUGHES: Object to the foundation.

12 MS. GOLDMAN: Lack of foundation.

13 MS. LEEPER: Okay. So let's go ahead and
14 look at the map together again.

15 MS. GOLDMAN: That's Exhibit 8?

16 MS. LEEPER: Yes.

17 MS. GOLDMAN: Can I have the question read
18 back, please?

19 THE REPORTER: Yes. "Commissioner Fain's
20 September 21st map splits the Latino population in the
21 Yakima Valley across Districts 13, 14, 15 and 16;
22 correct?"

23 MS. GOLDMAN: Objection, calls for
24 speculation.

25 Q (By Ms. Leeper) Are you familiar with the geography

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1 of Washington?

2 A Yes.

3 MR. HUGHES: Objection, vague.

4 Q (By Ms. Leeper) Are you familiar with what's
5 generally considered the Yakima Valley area?

6 MR. HUGHES: Objection, vague.

7 MS. GOLDMAN: Objection, vague.

8 A Yeah.

9 Q (By Ms. Leeper) What do you consider to be the
10 Yakima Valley area?

11 A The area the Yakima River flows through.

12 Q Can you see that on the map in front of you?

13 A The river?

14 Q Yes.

15 A Yeah, I think so. Yes, I think so.

16 Q And do you see how that area is split across
17 Districts 13, 14, 15 and 16?

18 MS. GOLDMAN: Objection, vague, calls for
19 speculation.

20 A Yes.

21 Q (By Ms. Leeper) Who drew this map?

22 A I believe I did.

23 Q On what platform or software did you draw this map?

24 A Edge.

25 Q And when you drew this in Edge had you uploaded the

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1 election results we talked about earlier?

2 A Yes.

3 Q And you were able to view the voting age population
4 through Edge; correct?

5 A Yes.

6 Q Did you upload this map to Dave's to view the
7 citizen voting age population?

8 A No. Not that I remember.

9 Q Did you hear any feedback from the Latino community
10 about this map?

11 MR. HUGHES: Objection, vague, lack of
12 foundation.

13 A I heard comments during the public hearings, yes.

14 Q (By Ms. Leeper) And what comments did you hear
15 during the public hearings, specifically as it relates to
16 the areas in Legislative Districts 14 and 15 in the
17 Yakima Valley?

18 A I would have to -- I don't remember exactly.

19 Q Do you recall any specific comments about
20 Legislative Districts 14 and 15 submitted in public
21 comments after the release of this map?

22 A Yeah, I'm sure we had some.

23 Q And do you recall any in particular?

24 A No.

25 Q All right. We can move on from that exhibit now.

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1 Do you recall the draft legislative maps that were
2 provided by Commissioner Sims and Walkinshaw on
3 October 25th, 2021?

4 A I know they submitted maps, yes.

5 Q Did you review those maps?

6 A Yeah.

7 Q Did you conduct analyses of those maps?

8 A I compared them, yes.

9 Q Both of those maps had majority Latino CVAP
10 districts in the Yakima Valley region; correct?

11 MS. GOLDMAN: Objection, calls for
12 speculation.

13 A Probably.

14 Q (By Ms. Leeper) To your recollection was the
15 majority Latino CVAP district in those maps LD 14?

16 MS. GOLDMAN: Objection, calls for
17 speculation. He's not looking at the documents.

18 Q (By Ms. Leeper) I'm just asking you a question about
19 what you remember about the maps.

20 MR. HUGHES: Objection, assumes facts not
21 in evidence.

22 A Yeah, probably.

23 Q (By Ms. Leeper) A district that was labeled LD 14
24 would align the Senate election with the presidential year
25 election; right?

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1 MS. GOLDMAN: Objection as to form, vague.

2 A It could.

3 Q (By Ms. Leeper) What do you mean by it could?

4 A There are off-year elections. I mean, if somebody
5 dies or resigns from office we have --

6 Q But the regularly scheduled election would be in
7 presidential year elections; correct?

8 MS. GOLDMAN: Objection as to form, vague.

9 A If -- What was the original question?

10 Q (By Ms. Leeper) Yeah. So if a district is labeled
11 LD 14, its regularly scheduled Senate election would fall
12 in the year of the presidential election; correct?

13 A Yes.

14 Q Whereas a district labeled LD 15 would have its
15 regularly scheduled Senate election not in that year;
16 correct?

17 A Correct. Right.

18 Q Did you have any reaction to the October 25th
19 proposals?

20 MS. GOLDMAN: Objection as to form, vague.
21 Calls for speculation.

22 A We had more work to do.

23 Q (By Ms. Leeper) What more did you have to work on?

24 A Well, input them and compare them, and have a --
25 negotiate on a plan.

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1 Q Once you looked at and had compared the October 25th
2 proposals of Commissioners Walkinshaw and Sims did you
3 have a reaction?

4 MS. GOLDMAN: Objection as to form, vague,
5 calls for speculation.

6 A Not particularly, no.

7 Q (By Ms. Leeper) Did you discuss the October 25th
8 proposals with Commissioner Fain?

9 A October 25th?

10 Q Yes.

11 A I'm sorry. I was still on the September 21st.

12 Q Okay. So let's go back then. So what we're talking
13 about is if you recall draft legislative maps proposed by
14 Commissioners Sims and Walkinshaw on October 25th.

15 A No, I'm sorry. I don't remember.

16 Q Do you recall after the original draft proposed maps
17 whether any commissioners publicly submitted additional
18 maps?

19 A Right. Yes.

20 Q And who did that?

21 A I think both the Democratic appointed -- appointees
22 resubmitted maps, I think.

23 Q And do you remember what was different about those
24 maps?

25 A They were trying to answer criticisms they got from

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1 their first round.

2 Q And so both of those maps had a majority Latino CVAP
3 district?

4 A Okay.

5 MS. GOLDMAN: And I just want to counsel
6 you need to answer based on your own knowledge.

7 THE WITNESS: Right.

8 Q (By Ms. Leeper) Did you discuss those additional
9 submissions by Commissioners Sims and Walkinshaw with
10 Commissioner Fain?

11 A Likely, yeah.

12 Q Did you discuss those proposals with anyone other
13 than Commissioner Fain?

14 A Probably Anton.

15 Q Anyone else?

16 A Not that I remember.

17 Q Do you remember what you talked about with Anton
18 about those proposals?

19 A Probably that they were just -- how they were
20 different from the original ones.

21 MR. HUGHES: Sorry, I didn't hear that
22 answer.

23 (Answer read back.)

24 MR. HUGHES: Thank you.

25 Q (By Ms. Leeper) And how about with Commissioner

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1 Fain?

2 A Likely.

3 Q What did you discuss about those proposals with
4 Commissioner Fain?

5 A Probably the same thing.

6 Q And that would be just how they differed?

7 A I think so.

8 Q Did you ever discuss with Commissioner Fain after
9 those maps the possibility of adding a majority CVAP
10 Latino district that would allow Latinos to elect their
11 candidates of choice in the Yakima Valley?

12 A I don't think so.

13 Q Okay. So I'm going to hand you what we're going to
14 be marking as Deposition Exhibit 10.

15 (Campos Exhibit No. 10 introduced.)

16 Q Have you reviewed the document?

17 A Yes.

18 Q Okay. Do you recognize this document?

19 A Yes.

20 Q What is it?

21 A It's a -- Let's see. It's a comparison of
22 something. It's a review of something, I guess. I don't
23 actually remember what this map is talking about.

24 It's a review of politically and -- of the
25 treasurer's race for a map.

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1 Q Based on the subject line it says, "Sims CVAP 14th
2 Legislative District filled out."

3 A There you go.

4 Q Is that the map that it was a review of?

5 A Likely, yes.

6 Q And just at a higher level, this is an email thread;
7 correct?

8 A Yes.

9 Q And it's between yourself and Commissioner Fain?

10 A Yes.

11 Q And it started with an email from you on
12 November 4th; correct?

13 A Yes.

14 Q And the thread continues through November 5th?

15 A Yes.

16 Q So what were you assessing in this email?

17 A I think Commissioner Sims' proposed district, the
18 15th -- for the 14th.

19 Q So looking at your assessment, do you see -- I think
20 it's easiest to read on that first chart on the first
21 page. Do you see where Legislative District 14 is
22 included?

23 A Sorry.

24 Q No worries. It's about midway down.

25 A Oh, yes.

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1 Q And the percentage for Pellicciotti in this LD 14 is
2 54.1 percent; correct?

3 A Yes.

4 Q And we'll just take a look at where LD 15 is
5 included as well. That's a bit further down to the
6 bottom.

7 A Yep.

8 Q The percent for Pellicciotti in that district is
9 36.2 percent; correct?

10 A Yes.

11 Q And so what that means is Pellicciotti would carry
12 and win in this LD 14; correct?

13 A Yeah.

14 Q And lose in LD 15?

15 A Yes.

16 Q Let's flip to the last page. If you could just read
17 where it says, "I renamed."

18 A Um-hmm. Yes.

19 Q Can you explain why you suggested changing the
20 numbering of the 14th and 15th districts?

21 A To keep existing members in their districts.

22 Q Did you foresee any secondary effects from changing
23 the numbering of the districts?

24 A Foresee any secondary effects? No.

25 MR. HUGHES: I'm sorry, I didn't hear that.

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1 MS. LEEPER: He said, "Foresee any
2 secondary effects? No."

3 MR. HUGHES: Thanks.

4 Q (By Ms. Leeper) So looking now at that same page,
5 you note funky/disturbing results. Looking down at the
6 bottom you include in your funky/disturbing results that
7 the CVAP district splits both Union Gap and Yakima.

8 A Um-hmm.

9 Q Why did you find that split to be funky or
10 disturbing?

11 A Yakima and Union Gap are cities, so we were trying
12 to keep as many cities whole as possible.

13 Q And by referring to that district as their CVAP
14 district, are you saying that it was majority Latino
15 citizen voting age population?

16 A No. I'm saying that's what they called it.

17 Q And you're referring to nothing other than just the
18 naming system?

19 A Yeah.

20 Q Do you know what CVAP stands for?

21 A Citizen voting age population.

22 Q Okay. All right. Let's look at another exhibit
23 now.

24 (Campos Exhibit No. 11 introduced.)

25 A I've reviewed the document.

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1 Q Okay. Thank you. Sorry, I'm also sending it
2 virtually on the Zoom every time. It takes a second.

3 All right. Do you recognize this document?

4 A Yes.

5 Q And what is it?

6 A It's a request from me to Min asking for a ranking
7 of a version of a map.

8 Q When you asked for a ranking chart, what would you
9 be asking for?

10 A Those charts that we just looked at.

11 Q And this is just an email thread between you and
12 Min Fei; correct?

13 A Yes.

14 Q And it occurred on November 8th of 2021; correct?

15 A Yes.

16 MS. GOLDMAN: I'm going to object as the
17 document speaks for itself, and there's another person
18 copied on it.

19 MS. LEEPER: Oh, does it? Okay.

20 Q (By Ms. Leeper) And who is included on that?

21 A Min, and cc'ing Joe Fain.

22 Q Okay. So Joe Fain is also included on this email;
23 correct?

24 A Yes.

25 Q And there's an attachment to this email as well;

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1 yes?

2 A Yes.

3 Q And what is that attachment?

4 A Oh, it's the ranking.

5 Q And so that would be Min sending you back the
6 ranking you asked for?

7 A Yes.

8 Q Okay. So for this next exhibit we're going to go
9 through a bit of a different protocol. These are Excel
10 documents, and so when you print them up they are not very
11 viewable. So I'm just going to go ahead and represent
12 that for Excel documents I have downloaded the Excel
13 document that was provided to us in a document review
14 process, and that this is going to be the Excel document
15 that was attached to that email.

16 And I'm going to share it on the Zoom just so you
17 can actually read it.

18 MS. GOLDMAN: And to be clear, you're
19 talking about the Excel that's attached to Campos
20 Exhibit 11?

21 MS. LEEPER: Yes, I am.

22 MS. GOLDMAN: Thank you.

23 MS. LEEPER: The Fain underscore V2
24 document.

25 MS. GOLDMAN: And are you numbering that

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1 as an exhibit?

2 MS. LEEPER: I'm going to be numbering that
3 as Exhibit 12. And I did send Jeanne the copies of those.

4 THE REPORTER: Thank you.

5 (Campos Exhibit No. 12 introduced.)

6 Q (By Ms. Leeper) Okay. Do you recognize this
7 document?

8 A Yes.

9 Q What is it?

10 A It's a ranking of a proposed plan.

11 Q Who drew the map that this report is assessing?

12 A I'm going to assume it was me.

13 Q And on what platform or software would you have
14 drawn that map?

15 A Edge.

16 Q Do you recall uploading this plan to Dave's for
17 looking at the CVAP?

18 A No, I don't.

19 Q All right. Let's take a look at some of the metrics
20 for this map specifically. And just to make it easier for
21 you to find it, I'm just going to sort this by number, if
22 that's okay with everyone. That way you don't have to be
23 looking at it and not knowing where it is.

24 So do you see where Legislative Districts 14 and 15
25 are included on this Excel document?

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1 A Yes.

2 Q Okay. And on this ranking chart what race is being
3 assessed?

4 A The treasurer's race.

5 Q And for that race what is the Pellicciotti
6 percentage for LD 14?

7 A 42.4.

8 Q Let me highlight it for you, make it a little easier
9 there.

10 A Oh, sorry. 43.0.

11 Q And how about for Legislative District 15?

12 A 50.2.

13 Q And so that means that Pellicciotti would be winning
14 in Legislative District 15; correct?

15 A Correct.

16 Q I'm going to go over to the 2020 general election
17 tab, and these ones are already in numerical order.

18 So looking at the top eight R percentage for
19 District 14, what is that?

20 A 53.8 percent.

21 Q And for Legislative District 15?

22 A 47.5.

23 Q And what does the top eight percentage indicate to
24 you?

25 A It's a percentage that the top eight races would

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1 have received in that proposed map.

2 Q And that's received for the Republican candidates;
3 correct?

4 A Yes.

5 Q On whose instruction did you make this new Fain V2
6 map?

7 A I don't know. I don't remember.

8 Q Who generally was giving you instructions about the
9 maps that you were drawing?

10 A Commissioner Fain.

11 Q Anyone else?

12 A No, not -- No, not really.

13 Q Were there any discussions with Commissioner Fain
14 about making Legislative District 15 a district that could
15 elect Latino candidates of choice?

16 A Not that I remember.

17 Q Did you have any discussions with Commissioner Fain
18 about making Legislative District 15 a district that would
19 elect Democratic candidates rather than Republicans?

20 A Was there any -- I don't remember.

21 Q Did you and Commissioner Fain ever talk about how he
22 wanted specific legislative districts to perform?

23 MS. GOLDMAN: Objection as to form.

24 A Yes.

25 Q (By Ms. Leeper) Do you recall any of those

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1 conversations specifically touching on Legislative
2 Districts 14 or 15?

3 A No, not that I can think of.

4 Q Did you have any discussions with anyone other than
5 Commissioner Fain about making Legislative District 15 a
6 district that would elect Democratic candidates rather
7 than Republicans?

8 A No.

9 Q This map Fain V2 was transmitted to Commissioners
10 Sims, Walkinshaw and their staff; correct?

11 MR. HUGHES: Object to form.

12 A I don't know. I don't remember.

13 Q (By Ms. Leeper) I'm going to go ahead and pull up an
14 email just for you to look at, and I'll go ahead and just
15 share it, make things easier.

16 (Document displayed.)

17 Q Okay. Do you see that on your screen?

18 A Yes.

19 Q What is the date on this email?

20 A November 8th.

21 Q And that's the date on both of the emails in the
22 thread; correct?

23 A Yes.

24 Q Do you see in the email on the bottom, the first
25 email, that Matt Bridges is sending a link of what he

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1 refers to as the Fain LD map?

2 A Yes.

3 Q He actually calls it "the long-awaited Fain LD map;"
4 correct?

5 A Yes.

6 Q Do you recall at some point sending a map to these
7 commissioners in the intermediary portion between
8 September 21st when the proposed maps were put out and on
9 November 15th when the final map was selected?

10 A Not specifically, no.

11 Q Do you remember generally whether maps were
12 exchanged?

13 MS. GOLDMAN: Objection, calls for
14 speculation.

15 A Yes, maps were exchanged.

16 Q (By Ms. Leeper) Do you know who Matt Bridges is?

17 A He's a Democratic caucus staffer from the Senate
18 Democratic caucus.

19 Q How about Ali O'Neil?

20 A She's the lead -- was the lead redistricting staffer
21 for the Senate Democratic caucus.

22 Q Was Matt Bridges someone that you would send maps to
23 when exchanging them with the other commissioners?

24 A No.

25 Q Was Ali O'Neil?

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1 A Yes.

2 Q Okay. So I'm going to go ahead and follow the
3 Dave's Redistricting link on this email. I'm going to
4 scroll out.

5 Do you recognize the contours of this map?

6 MS. GOLDMAN: Objection, calls for
7 speculation.

8 Q (By Ms. Leeper) Excuse me.

9 A Yes.

10 Q What do you recognize it as?

11 A The state of Washington.

12 Q Let's dig in a little bit more into the details
13 here. Do you see how this is titled Fain V2?

14 A Oh, yeah.

15 Q Do you recognize this map as being substantively
16 similar to the map that you drew under the name Fain V2?

17 MS. GOLDMAN: Objection, lack of
18 foundation, calls for speculation.

19 A It could be, yes.

20 Q (By Ms. Leeper) So just looking at this link and
21 specifically clicking in to look at Legislative District
22 15, do you see that Legislative District 15 has a Hispanic
23 voting age population majority?

24 A Yes.

25 MS. GOLDMAN: I'm going to -- I'm going to

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1 object here to lack of foundation, and calls for
2 speculation. This is not a document that he sent.

3 Q (By Ms. Leeper) And then I'm just going to go ahead
4 and ask you another question. Do you see here for citizen
5 voting age population 2019 that there's also an Hispanic
6 majority?

7 MS. GOLDMAN: Objection, lack of
8 foundation, calls for speculation.

9 You can read what's on the screen in front of you.

10 A Yes.

11 Q (By Ms. Leeper) When you drew maps on Edge you said
12 that you were able to view voting age population; correct?

13 A Yes.

14 Q Did you draw any maps that had a Latino majority
15 voting age population in Legislative District 15?

16 A Likely, yes.

17 Q How about Legislative District 14?

18 A Maybe. I don't remember.

19 Q I'm just going to share this one more time.

20 A Is this an exhibit?

21 Q No, I'm sorry. I'm sharing it on the screen again.
22 I think you can see it now -- or my Zoom suddenly locked
23 me out.

24 (Document displayed.)

25 Q Okay. So you see that Legislative District 15 is

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1 colored in orange on this map; correct?

2 A Yes.

3 Q Okay. So scrolling in and looking at Legislative
4 District 15 here, and you can also see with my cursor on
5 the side that cities pop up.

6 Do you see how this Legislative District 15 includes
7 parts of Union Gap?

8 MS. GOLDMAN: Objection, calls for
9 speculation, lack of foundation.

10 You can read what appears on the screen.

11 A Yes.

12 Q (By Ms. Leeper) Do you see how it includes parts of
13 the City of Yakima?

14 MS. GOLDMAN: Same objections.

15 A Yes.

16 Q (By Ms. Leeper) Also Granger?

17 MS. GOLDMAN: Same objections.

18 A Granger is toward the -- on the county line?

19 Q (By Ms. Leeper) Yes, right here.

20 A Oh, yes.

21 Q Sunnyside as well?

22 A Um-hmm.

23 MS. GOLDMAN: Same objections.

24 Q (By Ms. Leeper) Grandview?

25 MS. GOLDMAN: Same objections.

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1 A Yes.

2 Q (By Ms. Leeper) And then moving over, it also
3 includes parts of Pasco City; correct?

4 MS. GOLDMAN: Same objections.

5 A Yes.

6 Q (By Ms. Leeper) All right. Do you have shapefiles
7 for all of the maps that you created?

8 A Probably, yes.

9 Q All right. I'm going to hand out --

10 A I'm sorry. Can you go back to that previous map?

11 Q I can.

12 (Document displayed.)

13 A Can you zoom back in on Granger?

14 Q Um-hmm.

15 A It looks like the Yakama Reservation is not in the
16 14th. I don't know why they've done that.

17 Q This is Legislative District 15, --

18 A Oh.

19 Q -- the orange.

20 A Okay.

21 MR. HUGHES: Can I ask a clarifying
22 question?

23 MS. LEEPER: Let's hold that.

24 MR. HUGHES: Okay.

25 MS. LEEPER: Yeah. Thanks.

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1 Let's go off the record for a brief moment.

2 (Discussion off the record.)

3 (Break 12:28 p.m. to 1:33 p.m.)

4 MS. LEEPER: Everyone is here, and I think
5 we can go ahead and get on the record. Great.

6 Q (By Ms. Leeper) Okay. So I'm going to hand you what
7 we will be marking as Deposition Exhibit 13. Here you go.

8 (Campos Exhibit No. 13 introduced.)

9 Q All right. Have you had a second to review that?

10 A Yes.

11 Q Do you recognize that document?

12 A Yeah.

13 Q And what is it?

14 A It's an email from me to Commissioner Fain about a
15 version four and a version five.

16 Q And are these included as attachments?

17 A Yes.

18 Q And what are those attachments of the maps there?

19 A What are they? They're Excel files.

20 Q And the date of this email is November 11th;
21 correct?

22 MS. GOLDMAN: Objection, misstates the
23 record.

24 Q (By Ms. Leeper) What is the date on this email?

25 A November 10th.

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1 Q Tenth. Oh, gosh. I clearly didn't bring my entire
2 brain back with me from lunch. Thank you.

3 All right. So I'm going to go ahead and follow the
4 same protocol before, from before, with pulling up the
5 Excel document on the screen share; and I'll be pulling up
6 what is marked here as Fain V4, the Excel document, and
7 we'll be marking that as Exhibit No. 14 to the deposition.

8 (Campos Exhibit No. 14 introduced.)

9 MS. GOLDMAN: And Counsel, may I ask are
10 you going to be pulling up this email electronically and
11 going from there so we can watch that?

12 MS. LEEPER: No.

13 MS. GOLDMAN: Okay.

14 MS. LEEPER: So the document review
15 platform that we use doesn't allow you to click on that
16 link, --

17 MS. GOLDMAN: Okay.

18 MS. LEEPER: -- but it does link them on
19 the platform; so I've downloaded the attachment that's
20 connected to this email.

21 Q (By Ms. Leeper) Okay. Can you see my screen there?

22 A Yes.

23 Q And you can take a second to review this.

24 What is this document?

25 A It looks like a ranking of a proposed plan.

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1 Q And who drew the plan that this report is assessing?

2 MS. GOLDMAN: I'm going to object to lack
3 of foundation, and it calls for speculation based on the
4 fact that we can't see the source of this document.

5 Go ahead if you can answer.

6 A Probably me.

7 Q (By Ms. Leeper) Mr. Campos, did anyone else draw
8 maps for Commissioner Fain?

9 A I don't know.

10 Q When you sent Commissioner Fain rankings of maps
11 like this one, Fain V4, were you assessing the map that
12 you had drawn?

13 A Yes.

14 Q And on what platform were you drawing your maps
15 again?

16 A Edge.

17 Q Did you upload Fain V4 to Dave's Redistricting map?

18 A I -- No, I don't think so.

19 Q All right. So let's take a look at some of the
20 metrics for this map, and I'm going to do what I did
21 before and sort it smallest to largest just so it's easier
22 for you to find. We're going to be looking at draft
23 Districts 14 and 15 that I've highlighted for you.

24 What election are we looking at?

25 A The treasurer's race.

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1 Q And what is the result for draft District 14?

2 A 45.03.

3 Q And how about LD 15?

4 A 44.42.

5 Q So Pellicciotti would not win in either of those
6 districts; is that correct?

7 A Okay. Yes.

8 Q All right. So let's go over to the general election
9 page, and once again looking at Legislative Districts 14
10 and 15 under this plan.

11 What is the top eight R percentage of District 14?

12 A 51.9 percent.

13 Q And how about District 15?

14 A 53.2 percent.

15 Q And so that means that Republicans would tend to win
16 in the average of the top eight races in LD 14 and 15;
17 correct?

18 A Yes.

19 Q When you made changes to the plans over the course
20 of the redistricting process, was that in response to
21 feedback from Commissioner Fain?

22 A Yes.

23 Q Did you receive any feedback between the draft that
24 we looked at before lunch, which was Fain V2 in which
25 Legislative District 15 would elect Democrats, and Fain

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1 V5, which we're looking at -- pardon me, Fain V4, which
2 we're looking at, which would elect a Republican in
3 Legislative District 15?

4 A Not that I remember.

5 Q So why would you have made that change?

6 A Oh, on the percentage for the top eight?

7 Q (Nodded.)

8 A I don't know. Maybe -- I don't know.

9 Q Were there any discussions between V2 and V4 about
10 making LD 15 a district that would elect Republican
11 candidates rather than Democratic candidates?

12 MS. GOLDMAN: And are you asking him about
13 with Fain, or --

14 MS. LEEPER: Yes.

15 A On V2?

16 Q (By Ms. Leeper) I'll ask it again.

17 A Not that I remember, no.

18 Q Between V2 and V4 were there any conversations with
19 Commissioner Fain about making LD 15 a district that would
20 elect Republican candidates rather than Democratic
21 candidates?

22 A Not that I'd remember.

23 Q How about with anyone else?

24 A Not that I remember.

25 Q I'm going to hand you another exhibit. We'll be

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1 marking this as Exhibit 15 to the deposition. It's two
2 pages, but the second page is just someone's signature.

3 (Campos Exhibit No. 15 introduced.)

4 Q And let me know when you have had time to review the
5 document.

6 A I've reviewed the document.

7 Q Do you recognize this document?

8 A Yeah.

9 Q What is it?

10 A It's an email from Ali to me about a map proposal
11 that I then got into Edge and then sent a version to
12 Senator -- Commissioner Fain.

13 Q And when you say you got it into Edge, that's the
14 part of the email that includes Min Fei?

15 A Yes.

16 Q Okay. So we're going to look at the Dave's
17 Redistricting app link coming that is included on this
18 email; and I will share my screen, and you can see that I
19 copied that over. Let me just do that.

20 (Document displayed.)

21 Q Okay. So do you see I've linked the link in the
22 email, and we are now looking at the Dave's Redistricting
23 app page?

24 MS. LEEPER: And I'm going to go ahead and
25 mark this as Exhibit 16.

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1 (Campos Exhibit No. 16 introduced.)

2 <https://davesredistricting.org/maps#viewmap::cea2a82d-9539>
3 -4990-8e56-380e318e5753

4 Q All right. So we're going to go ahead and focus in
5 on District 14 of this map. You can look at your
6 computer, and we'll look at the District Details section.

7 MR. HUGHES: Simone, can I ask you to zoom
8 in on the district, please?

9 MS. LEEPER: Yes, I can.
10 Is that okay?

11 MR. HUGHES: That's great. Thank you.

12 MS. LEEPER: All right.

13 Q (By Ms. Leeper) Okay. So looking at the left side
14 bar where voting age population 2020 is visible, what is
15 the Hispanic voting age population of District 14 in this
16 map?

17 A 68.6 percent.

18 Q Okay. So now we're going to go ahead and look --
19 I'm going to add the overlay that's available. The
20 background map is already selected, so let's zoom in and
21 see.

22 Do you see here that LD 14 of this map includes
23 parts of Yakima City?

24 A Yes.

25 Q Also Union Gap?

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1 A Yes.

2 Q Wapato?

3 A Yes.

4 Q Toppenish?

5 A Yes.

6 Q Granger?

7 A Yes.

8 Q Sunnyside?

9 A Yes.

10 Q Also Grandview?

11 A Yes.

12 Q And do you also note that it includes part of Pasco

13 City?

14 A Right. Yes.

15 Q So I'm going to go ahead and go back over to the

16 side, and we're going to look at the performance of the

17 races in the side bar here.

18 Do you see for governor 2020?

19 A Yes.

20 Q The Democratic candidate would be successful;

21 correct?

22 A Yes.

23 Q So adding the treasurer 2020 race result, the result

24 for the treasurer 2020 race here is Democratic as well;

25 yes?

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1 A Yes.

2 Q And it's 56.9 percent for Pellicciotti?

3 A Yes.

4 Q Okay. Would you agree that the LD 14 in that map
5 was Walkinshaw's new VRA district for the Latino community
6 in the Yakima Valley region as of November 10th?

7 A I don't know what his map was.

8 Q This map was shared with you; correct?

9 A Right.

10 Q And let's look at the email, going back to
11 Exhibit 15, and the subject line is Walkinshaw 11/10 Leg
12 Map New VRA.

13 A So this is that map?

14 Q Yes.

15 A Okay.

16 Q That's the -- Since we clicked that link, that's
17 that map from that email.

18 A And I'll agree, yes.

19 Q And so that would be the -- It's cited in the email
20 as the new proposed Yakima Valley district; correct?

21 A Okay. Yes.

22 Q Do you know why Commissioner Walkinshaw made his VRA
23 district District 14 rather than District 15?

24 MS. GOLDMAN: Objection, calls for
25 speculation, lack of foundation.

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1 A No, I don't know why.

2 Q (By Ms. Leeper) Did you have any discussions
3 regarding the numbering of the VRA district in that
4 region?

5 A I suppose, yes.

6 Q With whom?

7 A With Commissioner Fain.

8 Q Anyone else?

9 A Probably Anton.

10 Q What did you discuss with Commissioner Fain
11 regarding the numbering of the legislative district in
12 that region?

13 A That it wasn't the 15th.

14 Q Did you discuss anything beyond the mere fact that
15 it wasn't the 15th?

16 A Not really. Not that I remember.

17 Q How about with Anton?

18 A Not that I remember.

19 Q Okay. So I'm going to pull out a new exhibit now,
20 and we'll be marking this Deposition Exhibit 17.

21 (Campos Exhibit No. 17 introduced.)

22 Q Okay. Have you had an opportunity to review this?

23 A Yes.

24 Q Do you recognize this document?

25 A Yes.

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1 Q What is it?

2 A It's an email from me to -- me cc'ing
3 Commissioner Fain about creating a ranking for a proposed
4 plan.

5 (Court reporter request to keep voice volume up.)

6 A A ranking for a proposed plan.

7 Q And what plan were you seeking a ranking for?

8 A 1110_Walkinshaw.xlsx.

9 Q Was that a map that was proposed by Commissioner
10 Walkinshaw?

11 A Yes, I believe so.

12 Q On the 10th of November, presumably?

13 A Presumably.

14 Q And what is the attachment to this email?

15 A An Excel spreadsheet.

16 Q Okay. So we're going to go ahead and look at that
17 Excel spreadsheet now, and we will be marking that
18 spreadsheet as Exhibit 18 to the deposition.

19 (Campos Exhibit No. 18 introduced.)

20 Q Do you recognize this document?

21 A Yes.

22 Q What is it?

23 A It's an Excel spreadsheet by legislative district
24 for the various election population and demographic
25 totals.

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1 Q This one looks a little different than the other
2 spreadsheets. Do you know why that is?

3 A Not that I can notice.

4 Q All right. So let's take a look at some of the
5 metrics in this spreadsheet. So we're on the Population
6 Totals tab, and we're going to go ahead and look over at
7 the treasurer section. We can see it here.

8 And this time what candidate is shown for
9 percentages?

10 A Davidson.

11 Q And who is Davidson?

12 A He was the Republican candidate for treasurer.

13 Q Running against Pellicciotti; correct?

14 A Yes.

15 Q Okay. So let's look at District 14 and the results
16 for that race. And I'll scroll over so they're next to
17 each other. It makes it a little easier here.

18 What is the percentage for Davidson in LD 14?

19 A For Davidson in LD 14 -- 43.0.

20 Q How about in LD 15?

21 A 65.7.

22 Q And so under this race in LD 15 Davidson would be
23 winning; correct?

24 A Yes.

25 Q But in LD 14 Pellicciotti would win; correct?

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1 A Yes.

2 Q All right. So we're going to go over to the tab
3 labeled 2020 General Election, and this time we're going
4 to be looking at the top eight R percentage for Districts
5 14 and 15.

6 What is the top eight R percentage for LD 14?

7 A 42.2 percent.

8 Q Could you -- I think it actually is 41.2 percent;
9 correct?

10 A Oh. Yes. Sorry.

11 Q Okay. And then how about for LD 15?

12 A 62.2 percent.

13 Q And so Walkinshaw's LD 14 would tend to elect
14 Democrats rather than Republicans; correct?

15 A Yes.

16 Q Okay. I'm going to be handing you what we'll be
17 marking as Deposition Exhibit 19.

18 (Campos Exhibit No. 19 introduced.)

19 Q Have you had an opportunity to review this document?

20 A Yes.

21 Q And do you recognize it?

22 A Yes.

23 Q What is it?

24 A It's an email from me to Min cc'ing
25 Commissioner Fain about creating a ranking for a draft

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1 titled November 12th.

2 Q And then Min responds with that ranking; correct?

3 A Yes.

4 Q And what is the attachment to this email?

5 A It's an Excel file containing the ranking.

6 Q And what time was the email sent to Min with the
7 ranking or with the shapefile to make a ranking?

8 A 5:05 a.m.

9 Q And she responded at 9:33 a.m. with that ranking;
10 correct?

11 A I'm sorry, I don't know if I sent her a shapefile.

12 Q If you say, "Please create a ranking chart for this
13 draft," would you be sending her usually the Edge?

14 What information would you be sending her?

15 A I think it would have been the Excel file.

16 Q Okay.

17 A I think.

18 Q And so she responded then with the ranking at
19 9:33 a.m.; correct?

20 A Yes.

21 Q And that's what the attachment is?

22 A Yes.

23 Q So I'm going to go ahead and pull that up now, and
24 we'll be marking this as Deposition Exhibit 20.

25 (Campos Exhibit No. 20 introduced.)

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1 Q Do you see that on your screen?

2 A Yes.

3 Q Do you recognize this document?

4 A Yes.

5 Q What is it?

6 A It's a ranking of a proposed plan, Version 2.

7 Q Oh, you know what, I have actually pulled up the
8 wrong document. Excuse me. We'll get there. Don't
9 worry.

10 A I was so worried.

11 Q I know you were. All right. Really quickly. Yes,
12 this is the right one.

13 (Document displayed.)

14 Q All right. So take a moment to look at this
15 document.

16 MS. GOLDMAN: So Counsel, I have a question
17 about your exhibit numbering.

18 MS. LEEPER: Yes.

19 MS. GOLDMAN: So you previously identified
20 the last Excel as Exhibit 20. Are you just going to
21 renumber this, or --

22 MS. LEEPER: Yes. Thank you very much. So
23 could we renumber this as Exhibit 20?

24 THE REPORTER: Sure.

25 MS. LEEPER: Thank you, Ms. Goldman.

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1 MS. GOLDMAN: Yes.

2 (Campos Exhibit No. 20 reintroduced.)

3 Q (By Ms. Leeper) And this is the attachment to the
4 email that I showed you previously in Exhibit 19.

5 MS. GOLDMAN: And again, I'm just going to
6 object that you're asking him to take that on faith, and
7 object on the basis of foundation and speculation.

8 And he can answer, assuming that's correct.

9 Q (By Ms. Leeper) Okay. Yeah, you can answer the
10 question, which I actually haven't asked yet.

11 So do you recognize this document?

12 A It looks similar to the other ones.

13 Q What is it?

14 A It's an Excel spreadsheet of a draft plan.

15 Q And what is that title?

16 A L Fain draft "number" 12.

17 MS. WAKNIN: Excuse me.

18 A November 12th.

19 MS. WAKNIN: Do you mind putting your hand
20 down --

21 THE WITNESS: I'm sorry.

22 MS. WAKNIN: -- and speaking a little
23 louder, just for the court reporter?

24 A L Fain Draft November 12th.

25 Q (By Ms. Leeper) Okay. And that was the title of --

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1 Pardon me. I've added L to the title because I changed
2 the names of the documents to make the numbering for the
3 deposition earlier, but the Fain November 12th title is
4 the same as in the Excel -- in the attachment of the
5 previous email; correct?

6 MS. GOLDMAN: I'm going to object, calls
7 for speculation, lack of foundation.

8 Q (By Ms. Leeper) Does the second part of the document
9 name match the document name in the email?

10 A It's -- Yes.

11 Q Thank you. All right. Let's take a look at some of
12 the metrics for this map. Let's look at 14 and 15 here.

13 And at this point we're looking at Pellicciotti's
14 race; correct?

15 A Yes.

16 Q What are the results for Legislative District 14 in
17 this map?

18 A 43.0.

19 Q And how about in Legislative District 15?

20 A 50.2.

21 Q And so in this race Pellicciotti would win in
22 Legislative District 15; correct?

23 A Yes.

24 Q All right. Let's take a look at the General
25 Election tab. And again, looking at Legislative

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1 Districts 14 and 15, and the top eight R percentage.

2 What is that for Legislative District 14?

3 A 53.8 percent.

4 Q And how about for 15?

5 A 47.5 percent.

6 Q And so that means that for the top eight races
7 Democrats tend to win in that district rather than
8 Republicans; correct?

9 A Which district?

10 Q Legislative District 15.

11 A Yes.

12 Q Did you have any -- Let's look back really quickly
13 at Deposition Exhibit 19. Can you take a look at that?

14 What time was that email sent?

15 MS. GOLDMAN: There are two emails.

16 THE WITNESS: Yeah.

17 Q (By Ms. Leeper) The top email, "Just a reminder."

18 A 9:33 a.m.

19 Q All right. I'm going to go ahead and show you
20 another email, and we'll be marking this as Deposition
21 Exhibit 21.

22 (Campos Exhibit No. 21 introduced.)

23 Q Excuse me. I need to send it to everyone.

24 Have you had a chance to review this?

25 A Yes.

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1 Q And do you recognize this document?

2 A Yes.

3 Q What is it?

4 A It's an email from -- let's see -- me to Min, asking
5 for a ranking, cc'ing Commissioner Fain on a version two
6 proposed map.

7 Q And then the second email is Min responding with
8 that ranking; correct?

9 MS. GOLDMAN: Objection, misstates the
10 document.

11 Q (By Ms. Leeper) So the second email is the one
12 that's on the top because of the way the emails are
13 presented in thread form, and so the email at the top of
14 the page is from Min to you and Commissioner Fain;
15 correct?

16 A Yes.

17 Q And is there an attachment to that document?

18 A Yes.

19 Q What is the attachment?

20 A Fain draft November 12th V2. It's an Excel file.

21 Q And what time was that email sent?

22 A At -- The top one? At 6:37.

23 Q And how about the bottom one?

24 A The bottom one at 6:24 p.m.

25 Q Okay. I'm now going to open up that Excel file for

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1 you to look at. I told you it would come back. And we'll
2 be marking this as Deposition Exhibit 22.

3 (Campos Exhibit No. 22 introduced.)

4 Q Now, this file is titled S Fain Draft November 12
5 V2; correct?

6 A Yes.

7 Q And apart from the S, does that match the email in
8 Exhibit 21?

9 A Yes.

10 Q Do you recognize this document?

11 A Yes.

12 Q What is it?

13 A A ranking of the proposed plan.

14 Q Let's take a look at some of the metrics for this
15 map as well. Looking at the ranking tab -- and again,
16 I'll sort by district just to make it easiest -- looking
17 at District 14 what is the percentage for Pellicciotti in
18 District 14?

19 A 43.4 percent.

20 Q How about in Legislative District 15?

21 A 45.8 percent.

22 Q And so Pellicciotti would not win in either of these
23 districts; correct?

24 A Correct.

25 Q All right. Let's go to the 2020 General Election

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1 tab. Looking at District 14, what is the top eight R
2 percentage?

3 A Fourteen? 53.4 percent.

4 Q How about 15?

5 A 51.9 percent.

6 Q And so Republicans would win by the top eight metric
7 in both of these districts; correct?

8 A Yes.

9 Q Were there any discussions that you had with the
10 commissioners that sparked the change in LD 15 between
11 November 12th, the morning map, and the November 12th V2
12 map in the evening?

13 A I wouldn't remember.

14 Q What about conversations with staffers?

15 A Again, I don't -- I don't remember.

16 Q Why would you change a map from the morning to an
17 evening of a day?

18 A To respond to some request, I would think.

19 Q And so there would have had to be a request for you
20 to make a change in a district over the course of a day?

21 A Usually, yes.

22 Q Are there any circumstances under which you would
23 just make a change in a district of your own volition over
24 the course of a day?

25 A Well, just to see what would happen, out of --

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1 Q Would you --

2 A -- out of curiosity.

3 Q Would you have then sent those out to
4 Commissioner Fain?

5 A No.

6 Q So if you were sending Commissioner Fain a map, it's
7 because you were doing something responding to a request
8 from him; correct?

9 A A request.

10 Q Were there any discussions on the day of
11 November 12th about making Legislative District 15 a
12 district that would not elect Latino candidates of choice?

13 A I don't remember, no.

14 Q Were there any discussions on November 12th between
15 the morning and the evening about making Legislative
16 District 15 a district that would elect Republicans rather
17 than Democrats?

18 A I don't remember.

19 (Court reporter request to keep voice volume up.)

20 THE WITNESS: Yes. I'm sorry.

21 Q Okay. I'm going to show you another document, and
22 we'll be marking this as Exhibit 23 to the deposition.

23 MS. LEEPER: I think. Is that right?

24 THE REPORTER: Yes, that's correct.

25 (Campos Exhibit No. 23 introduced.)

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1 Q (By Ms. Leeper) Okay. Have you had a chance to
2 look at this document?

3 A Yes.

4 Q Do you recognize it?

5 A Yes.

6 Q What is it?

7 A It's an email from Ali to me sending me
8 Commissioner Walkinshaw's latest legislative map proposal.

9 Q And Commissioner Walkinshaw is also included on the
10 email; correct?

11 A Yes.

12 Q And this is an email from November 13th; is that
13 right?

14 A Yes.

15 Q Are there any attachments to this email?

16 A Two.

17 Q What are they?

18 A It's a geographic shapefile and a text file, CSV
19 file.

20 Q Reading the text of that email, it says, "Brady
21 asked me to share this latest legislative map proposal
22 with you and Commissioner Fain in advance of their
23 check-in this morning."

24 Did you attend a check-in with Commissioner Fain and
25 Commissioner Walkinshaw on November 13th?

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1 A Probably.

2 Q What was discussed at that meeting?

3 A I mean, I assume this proposal. I don't remember.

4 Q Were you present for any conversations between
5 Commissioners Fain and Walkinshaw regarding Legislative
6 Districts 14 and 15 in the days leading up to
7 November 15th?

8 A Yes. I would think, yeah.

9 Q And what was the content of those meetings?

10 A If I recall, they didn't like Fain's 14 and 15.

11 (Court reporter request for clarification.)

12 A They didn't like Fain's 14th and 15th, and Fain
13 didn't like their 14th and 15th.

14 Q And who's they?

15 A Ali and Commissioner Walkinshaw.

16 Q And why did they not like Fain's 14 and 15?

17 A Probably --

18 MS. GOLDMAN: Objection, calls for
19 speculation, lack of foundation.

20 A I'm assuming because they didn't like that it
21 wouldn't elect Democrats. Is that the question?

22 Q (By Ms. Leeper) When you saying you're assuming,
23 I'm asking about the conversations that you were present
24 at.

25 A Um-hmm.

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1 Q What did Commissioner Walkinshaw and Ali O'Neil say
2 that they didn't like about Commissioner Fain's 14 and 15?

3 A I can't remember specifically.

4 Q What did Commissioner Fain express not liking about
5 Senator Walkinshaw's 14 and 15?

6 A Again, I can't remember specifically.

7 Q Did you express anything about Legislative Districts
8 14 and 15?

9 A No, not that I -- Not that I remember.

10 Q All right. Let's look at the Dave's Redistricting
11 app link that's available on this email. And once again
12 I'll share my screen and let you guys see me clicking
13 through there.

14 So this is the exhibit that's marked as Deposition
15 Exhibit 23, and you see I'm clicking the link in that
16 exhibit; and it has taken me to the Dave's Redistricting
17 app page that's before you now, which we're going to be
18 marking as Deposition Exhibit 24.

19 (Campos Exhibit No. 24 introduced.)

20 <https://Davesredistricting.org/maps#viewmap::eldf6b44-cbb6>
21 [-4873-alf6-clb6a8bf5f77](https://Davesredistricting.org/maps#viewmap::eldf6b44-cbb6)

22 Q Did you review this map when it was sent to you?

23 A Probably.

24 Q Let's look at the specifics here. We're going to be
25 looking at Legislative District 14 and the details that

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1 are available.

2 And you can see that 14 here is olive; correct?

3 A Okay.

4 Q Okay. The voting age population for the Hispanic
5 community in this district is 67.7 percent; correct?

6 A That's what it says, yeah.

7 Q And looking at the races that are at this link, the
8 Governor's 2020 race is 54.4 percent Democratic; correct?

9 A Yes.

10 Q And I'll go ahead and select the Treasurer 2020
11 race. That comes up 54.1 percent Democratic; correct?

12 A Yes.

13 Q Let's look in at the specifics of this district.
14 And I'm adding in the background map overlay, which allows
15 you to view that.

16 Do you see that this LD 14 includes parts of Yakima
17 City?

18 A Yes.

19 Q It includes parts of Union Gap?

20 A Yes.

21 Q Wapato?

22 A Yep.

23 Q Toppenish?

24 A Yes.

25 Q Granger?

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1 A Yes.

2 Q Sunnyside?

3 A Yes.

4 Q It's kind of hard to see here, but can you see it
5 also includes parts of Mattawa?

6 A Yes.

7 Q Okay. And it also includes parts of Othello. There
8 we go, Othello as well; correct?

9 A Yes.

10 Q We're going to look at one more email from
11 November 13th, which I'm going to give to you and mark as
12 Deposition Exhibit 25.

13 (Campos Exhibit No. 25 introduced.)

14 Q Have you had an opportunity to review it?

15 A Yes.

16 Q Do you recognize this document?

17 A Yes.

18 Q What is it?

19 A It's an email showing what incumbents were left in
20 or out of the Walkinshaw draft November 13 proposal, my
21 request to Min for some rankings, and it includes some
22 attachments, an Excel spreadsheet and a graphic file,
23 geographic file.

24 Q And so this is a thread ranging from 1:49 on
25 November 13th and 2:20 -- or 2:19 on November 13th; is

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1 that correct?

2 A Yes.

3 Q And on it, as you said, is yourself,
4 Commissioner Fain, and for some of the lower emails
5 Min Fei as well; correct?

6 A Yes.

7 Q What are the attachments on the email at the top?

8 A An Excel spreadsheet and a geographic file.

9 Q And it's titled Walkinshaw draft November 13th;
10 correct?

11 A Yes.

12 Q Looking at the text of the email there, what did you
13 mean when you said that the 14th or 15th seems to be a
14 labeling issue?

15 A I meant that Senator Honeyford and Senator King were
16 in the wrong districts and that they mislabeled them.

17 Q By relabeling the districts, if this were to have
18 become the final map would there have been any secondary
19 effects?

20 MS. GOLDMAN: Objection, calls for
21 speculation.

22 A I don't know.

23 Q (By Ms. Leeper) Does changing the number of a
24 district sometimes change the election year?

25 A Exactly, yes.

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1 Q And so if you switched to the numbering of this map,
2 it would change the year in which elections occur;
3 correct?

4 A Correct.

5 Q You discussed earlier how turnout is lower in
6 presidential and non-presidential elections; correct?

7 A In both?

8 Q That turnout is lower in non-presidential elections.

9 A Yes.

10 Q So changing the year in which elections occur would
11 also change voter turnout; correct?

12 MR. HUGHES: Objection, calls for
13 speculation.

14 A I would assume, yes.

15 Q (By Ms. Leeper) Okay. So I'm going to pull up
16 another Excel document just to look at, and we're going to
17 be marking this Deposition Exhibit 26.

18 (Campos Exhibit No. 26 introduced.)

19 Q And really quickly, if you're looking at Exhibit 25
20 could you tell me again the name of the Excel document
21 attached to that?

22 A Walkinshaw draft November 13th.

23 Q Okay. So now looking at the document that I've just
24 pulled up, apart from the X at the beginning is that
25 document titled the same?

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1 A Yes.

2 Q All right. I'll give you a moment to look at this.

3 Do you recognize this document?

4 MS. GOLDMAN: I'm going to object. Lack of
5 foundation, and calls for speculation.

6 A It looks like another comparison of a proposed map.

7 Q (By Ms. Leeper) Okay. Does this look like the
8 comparisons that were made for you by Min Fei?

9 A Yes.

10 Q And you received regularly rankings by Min Fei;
11 correct?

12 A I received it when I asked for them, yes.

13 Q And we saw in the previous email that you had asked
14 for a ranking of the Walkinshaw draft November 13th;
15 correct?

16 A Yes.

17 Q Okay. So I'm going to represent to you that I
18 downloaded the attachment to that email, and this is that
19 attachment.

20 Let's look at the rankings for this map. Looking at
21 District 14, what is the result for Pellicciotti?

22 A 54.1 percent.

23 Q How about 15?

24 A 36.2 percent.

25 Q So Pellicciotti would be winning Legislative

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1 District 14 here; correct?

2 A Yes.

3 Q Now let's go to the 2020 General Election, and again
4 let's look at Districts 14 and 15.

5 What is the top eight R percentage for District 14?

6 A 43.8 percent.

7 Q And for 15?

8 A 60.7 percent.

9 Q And so Democrats would tend to win in Legislative
10 District 14; correct?

11 A Yes.

12 Q Okay. I want to talk about the day of
13 November 13th. That was the Saturday before November 15th
14 when maps were to be approved; correct?

15 A Okay. Yes.

16 Q What did you do on that day?

17 A I don't remember exactly, but I probably was
18 drafting maps.

19 Q Were you in person with any commissioners?

20 A I don't remember.

21 Q Do you remember where you were working generally
22 when you were drafting maps?

23 A On my laptop at home, yeah.

24 Q And in the lead-up to the finalization on
25 November 15th where generally were you working?

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1 A The last couple of days at -- in Federal Way.

2 Q I'm sorry, could you repeat that?

3 A In Federal Way.

4 Q Federal Way?

5 A Yeah.

6 Q Okay. And so you were in person working in
7 Federal Way; correct?

8 A The last couple of days, yes.

9 Q And were you working drafting maps with anyone else
10 in person there?

11 A In Federal Way?

12 Q Yes.

13 A Yeah, sometimes.

14 Q Who else was present when you were drafting?

15 A Anton probably was.

16 Q Anyone else?

17 A Commissioner Fain. Commissioner Graves.

18 Q Were they present when you were drafting maps on
19 November 13th?

20 A Saturday? I don't think so, no.

21 Q How were you in communication with Commissioner Fain
22 over the weekend leading up to the vote?

23 A Calls and in person.

24 Q So you were in person in that lead-up as well?

25 MS. GOLDMAN: Objection, vague.

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1 A In what --

2 Q (By Ms. Leeper) You met with Commissioner Fain in

3 person in the lead-up to November 15th; correct?

4 A On Sunday and Monday.

5 Q Okay.

6 A I think it was Sunday.

7 Q Did you meet in person with Commissioner Graves on

8 Saturday?

9 A I don't think so, no.

10 Q But you did meet with him in person on Sunday and

11 Monday?

12 A I think so.

13 Q How about Anton?

14 A Yeah, Sunday and Monday.

15 Q Did you meet with him in person on Saturday?

16 A No, not that I remember.

17 Q Did you have any text communications with

18 Commissioner Fain in the lead-up to November 15th?

19 A Yes.

20 Q How about email?

21 A Yeah.

22 Q And you already mentioned phone calls.

23 A Yes.

24 Q Did you communicate with Commissioner Fain in any

25 other way?

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1 A I don't believe so.

2 Q All right. Did you text with Commissioner Graves in
3 the lead-up to the November 15th vote?

4 A I don't remember.

5 Q Did you email with him?

6 A I don't remember.

7 Q And you did meet with him in person you said on
8 Sunday and Monday; correct?

9 A Yes.

10 Q Did you have any phone calls with him?

11 A I don't remember.

12 Q Did you text with Anton in the lead-up to
13 November 15th?

14 A Yes.

15 Q Email?

16 A Yes.

17 Q Did you have phone calls with him?

18 A Yes.

19 Q Did you use any other form of communication to talk
20 to Anton in the lead-up to November 15th?

21 A No, not that I remember.

22 Q In this weekend leading up to November 15th you said
23 earlier that maps changes that you made and then
24 transmitted to Commissioner Fain were changes that were
25 done at his direction; correct?

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1 MS. GOLDMAN: Objection, misstates the
2 testimony.

3 A Yeah, I don't think that's what I said, did I?

4 Q (By Ms. Leeper) When you were drafting maps over the
5 weekend in the lead-up to November 15th you sent
6 Commissioner Fain a number of maps; correct?

7 A Yes.

8 Q And there were changes between those maps; correct?

9 A Yes.

10 Q What was your motivation, or what was the impetus
11 for making those changes?

12 A Issues he had with a map, so I would make a change.

13 Q So the changes you made and transmitted to
14 Commissioner Fain in the lead-up to November 15th were in
15 response to changes that he requested?

16 A Yes.

17 Q Okay. I'm going to introduce another exhibit, and
18 we'll be marking this as Deposition Exhibit No. 27.

19 (Campos Exhibit No. 27 introduced.)

20 Q Have you had an opportunity to review this document?

21 A Yes, I have.

22 Q And what is it?

23 A It's an email from me to Min asking for a ranking on
24 a Fain Groves proposal for the legislative district.

25 (Court reporter request for clarification.)

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1 THE WITNESS: Fain Groves proposal for the
2 legislative districts and a response, and my forwarding
3 that response to Senator Fain -- or Commissioner Fain.

4 Q And when is this email from?

5 A November 14th.

6 Q And I believe you misspoke. It is the Fain Graves
7 proposal; correct?

8 A It says Fain Graves proposal.

9 Q And what is the attachment on the email?

10 A An Excel spreadsheet.

11 Q And what is the title of that Excel spreadsheet?

12 A Fain Graves Proposal LD.

13 Q Okay. I'm going to go ahead and share my screen.

14 Okay. Now, we'll be marking this document as Deposition
15 Exhibit 28.

16 (Campos Exhibit No. 28 introduced.)

17 Q I'll represent to you that I downloaded the
18 attachment to the previous email, and that is this Excel
19 document.

20 MS. GOLDMAN: I'm going to object for lack
21 of foundation, and calls for speculation.

22 Q (By Ms. Leeper) Do you see how apart from the letter
23 Z the title of this Excel document matches the Excel
24 document in the email?

25 A Yes.

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1 Q Do you recognize this document?

2 A Yes.

3 Q What is it?

4 A It's a ranking of the Fain Graves proposal LD.

5 Q Very quickly let's turn back to Deposition

6 Exhibit 27. When you sent the email to Min Fei saying,

7 "Rankings, please," --

8 A Um-hmm.

9 Q -- what was the attachment? What attachment would
10 you have put with that email?

11 A This Excel spreadsheet.

12 Q Okay. And using the Excel spreadsheet Min Fei then
13 made the rankings; correct?

14 A Yes.

15 Q And that's what -- Scratch that.

16 Let's look at some of the metrics for this chart,
17 this map.

18 What is the Pellicciotti percentage for Legislative
19 District 14?

20 A 42.3 percent.

21 Q How about for Legislative District 15?

22 A 46.7 percent.

23 Q That means that Pellicciotti would not win in either
24 district; correct?

25 A Not based on these metrics, no.

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1 Q Okay. So now looking -- there we go -- at the 2020
2 General Election, what is the top eight R percentage for
3 Legislative District 14?

4 A Top eight, 54.8 percent.

5 Q And for District 15?

6 A 51.0 percent.

7 Q Meaning that Republicans would tend to win in both
8 Legislative Districts 14 and 15; correct?

9 A Based on this metric, yes.

10 Q Okay. I think I've stopped sharing my screen; is
11 that correct?

12 A Yes.

13 Q Did you transmit this map to Commissioner Sims or
14 Walkinshaw?

15 A I don't remember.

16 Q Do you remember transmitting maps to
17 Commissioner Sims and Walkinshaw over in the lead-up to
18 the November 15th vote?

19 A I would have sent them to Ali or Osta, I think.

20 Q Did you send this map to Ali or Osta?

21 A I don't remember.

22 Q All right. I'm going to hand you what's going to be
23 marked as Deposition Exhibit 29.

24 (Campos Exhibit No. 29 introduced.)

25 Q Before we do that I wanted to turn back quickly to

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1 Deposition Exhibit 27.

2 What time was that email at the top sent?

3 A At the top? 10:28 p.m.

4 Q Okay. Now let's look back at Exhibit 29.

5 What is this document?

6 A It's an email from me to Min asking for another
7 rankings on Fain Graves proposal version two.

8 Q And what time did you send that request?

9 A At 9:09 a.m.

10 Q And what time did you receive the response from
11 Min Fei?

12 A At 9:37 a.m.

13 Q And then you transmitted that response to
14 Commissioner Fain; correct?

15 A Yes, together with an Excel spreadsheet.

16 Q And what time was that?

17 A At 9:40.

18 Q And what's that Excel spreadsheet?

19 A It's a ranking of the Fain Groves proposal version
20 two.

21 Q I'm going to repeat once again that I downloaded the
22 attachment to that email. I'm going to share that with
23 you now and mark that as Deposition Exhibit 30.

24 (Campos Exhibit No. 30 introduced.)

25 MS. GOLDMAN: And I'm going to object to

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1 questions about this document based on lack of foundation
2 and speculation.

3 Q (By Ms. Leeper) Looking at Exhibit 29, which is
4 actually the email, what was the name of the Excel
5 document?

6 A Fain_Groves_Prop version V2.

7 Q And apart from the letters BB, is this Excel
8 document the same title?

9 A Yes.

10 Q Do you recognize this document?

11 A Yes.

12 Q What is it?

13 A It's a ranking that I asked Min Fei for for a
14 legislative district proposal.

15 Q Let's look at the results for 14 and 15 again.
16 What are the results for Legislative District 14?

17 A 42.3 percent.

18 Q And 15?

19 A 46.7 percent.

20 Q Meaning that once again Pellicciotti would not win
21 in either race; correct?

22 A Not based on these metrics, correct.

23 Q Now let's look at the 2020 General Elections and the
24 numbers for the top eight R.

25 What is the percentage for Legislative District 14?

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1 A 54.8 percent.

2 Q And for Legislative District 15?

3 A 51.8 -- zero percent.

4 Q Okay. Now, you may not remember because I'm asking
5 you to read a lot of numbers right now, but those numbers
6 that you've just read out are actually identical to the
7 numbers for Legislative Districts 14 and 15 in the
8 previous draft.

9 A Um-hmm.

10 Q Is that correct?

11 A Yeah, I'll agree to that.

12 Q For those numbers to be exactly the same, would
13 those districts have to be the same in the map?

14 MS. GOLDMAN: Objection as to form.

15 A Not necessarily, no.

16 Q (By Ms. Leeper) Generally speaking when you're
17 drawing maps, does changing district lines tend to result
18 in differences in the election results?

19 A Changing district lines?

20 MR. GORDON: Object to the form.

21 A Yes, changing district lines tends to change
22 election results.

23 Q (By Ms. Leeper) Did you make any changes to this map
24 between the Fain -- to specifically Legislative Districts
25 14 and 15 between the Fain Graves prop LD distributed at

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1 10:28 p.m. on November 14th and the Fain Graves Prop V2
2 distributed on November 15 at 9:40 a.m.?

3 A Not that I remember.

4 Q Did you transmit this map to Ms. O'Neil or any of
5 the Democratic commissioners or staffers?

6 MS. GOLDMAN: Objection as to form, vague.

7 A I don't remember.

8 Q (By Ms. Leeper) Do you remember sending maps to
9 Commissioners Sims, Walkinshaw, or their staffers in the
10 lead-up to November 15th?

11 A Yes.

12 Q Do you remember sharing maps with Commissioners
13 Sims, Walkinshaw, or their staffers on the day of
14 November 15th?

15 A Yes. Probably, yes.

16 Q At what times did you send them maps?

17 A My guess would be in the morning or early afternoon,
18 I would think.

19 Q Okay. I'm going to give you another exhibit, which
20 we will be marking as Exhibit 31 to this deposition.

21 (Campos Exhibit No. 31 introduced.)

22 Q Have you had an opportunity to review the document?

23 A Yes. Sorry.

24 Q Do you recognize it?

25 A Yes.

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1 Q What is it?

2 A It's a request from me to Min asking for rankings on
3 an LD for a final proposal, asking her for a response, and
4 then me forwarding it on to Commissioner Fain with, I
5 guess, a link to a map.

6 Q And is there an attachment to the email to
7 Commissioner Fain?

8 A There's the link and an Excel file.

9 Q Okay. So I'm going to represent to you again that
10 I've downloaded that Excel file.

11 Looking at the email, what is the name of the
12 document?

13 A LD_Final.

14 Q Okay. And apart from the letters DD, is the title
15 in the Excel document that I've just pulled up the same?

16 A Yes.

17 MS. GOLDMAN: And I'm going to object,
18 calls for speculation, lack of foundation.

19 MS. LEEPER: What foundation is missing
20 from me asking him if the titles match?

21 MS. GOLDMAN: I'm just generally objecting
22 to your asking him questions about a document, the
23 document in general. He --

24 MS. LEEPER: But not to the question?

25 MS. GOLDMAN: Well, I mean, anybody can

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1 read the words that you just did. So he has the
2 foundation, and then he knows how to read; and he can say
3 those are the same letters that appear in the email.

4 MS. LEEPER: So I would ask that you keep
5 your objections to the questions, as is required by the
6 rules, and not to the content of my question.

7 MS. GOLDMAN: And I will object as I deem
8 appropriate.

9 MS. LEEPER: Thank you.

10 Q (By Ms. Leeper) Mr. Campos, --

11 A Yes.

12 Q -- do you recognize this document?

13 A Yes.

14 Q What is it?

15 A It's a ranking of a proposed legislative map.

16 Q And is it a ranking of the final legislative map
17 that was approved by the commission?

18 A That's how it reads. I don't know what it is,
19 though.

20 Q Mr. Campos, were you involved in the drawing of the
21 final map that was proposed by the -- approved by the
22 commission?

23 A Not directly, no.

24 Q How were you indirectly involved?

25 A I was sitting there watching it happen.

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1 Q And who was drawing it?

2 A Osta and Anton.

3 Q Did you provide any verbal feedback?

4 MS. GOLDMAN: Objection, vague.

5 Q (By Ms. Leeper) You can answer.

6 A Feedback to who?

7 Q While Osta and Anton were drawing the map and you
8 were sitting there next to them, did you speak about the
9 map?

10 A I may have commented from time to time.

11 Q Did you comment with regard to Legislative Districts
12 14 and 15?

13 A To the degree a line seemed odd to me, yes, I think.

14 Q Do you specifically recall commenting on it --

15 A No.

16 Q -- at that time?

17 A No. I'm sorry.

18 Q And on what platform or software was the map being
19 drawn?

20 A Dave's Redistricting.

21 Q What metrics, like elections or population, were
22 selected at the time that the map was being drawn?

23 MR. HUGHES: Object to form.

24 MS. GOLDMAN: What was that? Did you
25 object?

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1 MR. HUGHES: Yes. I said object to form.

2 MS. GOLDMAN: Oh, okay.

3 A I was just sitting to the side. I don't know what
4 was actually selected. I don't remember.

5 Q (By Ms. Leeper) All right. Let's take a look at
6 some of the rankings on this map. Looking at Legislative
7 District 14, what is the Pellicciotti score?

8 A 42.3 percent.

9 Q What about Legislative District 15?

10 A 46.7 percent.

11 Q Now looking at the 2020 General Election, what is
12 the top eight R percent for Legislative District 14?

13 A 54.8 percent.

14 Q How about for District 15?

15 A 51.0 percent.

16 Q And those are again identical to the two previous
17 draft maps that we viewed; correct?

18 A Okay.

19 Q Did you make any alterations to Legislative
20 Districts 14 and 15 on the day of November 15th?

21 MS. GOLDMAN: Objection as to form.

22 A Not that I remember.

23 Q (By Ms. Leeper) Were you present when legislative --
24 Were you present when Anton Grose made any changes to
25 Legislative District 14 on the day of November 15th?

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1 A Changes to what?

2 Q To the map, the lines.

3 A What was the question? I'm sorry.

4 Q Were you present --

5 A When he was making changes?

6 Q -- when Anton Grose made any changes to Legislative
7 District 14 on the day of November 15th?

8 A Yes, I would have been present.

9 Q Were you present when changes were made to
10 Legislative District 14 specifically?

11 A Yes.

12 Q What changes were made?

13 A I don't remember specifically.

14 Q All right. So let's look at leaving Exhibit 31 and
15 going back to Exhibit 30. I'm going to share my screen so
16 that we can take a look at the Dave's Redistricting app
17 link that's included in this email.

18 So you can see I've opened it up, and I am clicking
19 on the link; and we have entered Dave's Redistricting app.

20 MS. GOLDMAN: I'm sorry, is this
21 Exhibit 29?

22 MS. LEEPER: Yes, it is. My apologies.

23 MS. GOLDMAN: The date is different.

24 Oh, you're looking at Exhibit 31?

25 MS. LEEPER: Yes, 31 is the one I was

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1 referring to instead.

2 MS. GOLDMAN: Okay.

3 MS. LEEPER: Yes, I was incorrect.

4 MS. GOLDMAN: Thank you.

5 Q (By Ms. Leeper) How would you -- You sent this
6 Dave's Redistricting app link to Commissioner Fain;
7 correct?

8 A Yes.

9 (Campos Exhibit No. 32 introduced.)

10 <https://davesredistricting.org/maps#viewmap::79b084b2-ef4c-48cd-98ac-f49453087e36>
11

12 Q How would you have made this link?

13 A I would have probably asked Anton for it.

14 Q And so Anton provided the link to you?

15 A That's what I would remember, yes.

16 Q Looking at this district, are you aware that Dave's
17 Redistricting app links preserve the datasets that were
18 selected by the creator of the link when the link is made?

19 MR. HUGHES: Objection, lack of foundation.

20 MS. GOLDMAN: Join.

21 A I'm not sure how Dave's works.

22 Q (By Ms. Leeper) Okay. Do you see that the datasets
23 available to review are total population adjusted 2020 --

24 MS. GOLDMAN: You're not sharing.

25 MS. LEEPER: I --

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1 MS. GOLDMAN: Well, you're sharing an
2 email, not --

3 MS. LEEPER: Oh, I apologize. I just
4 shared the wrong thing. Excuse me.

5 (Document displayed.)

6 Q (By Ms. Leeper) Do you see this map now?

7 A Yes.

8 Q Okay. Do you see that the district details that are
9 available there is total population adjusted, 2020?

10 A Yes.

11 Q Citizen voting age population, 2019?

12 A Yes.

13 Q Pardon me. I just opened a --

14 Okay. Governor, 2016?

15 A Yes.

16 Q Governor, 2020?

17 A Yes.

18 Q And President, 2020?

19 A Yes.

20 Q What is the citizen VAP 2019 for the Hispanic
21 population?

22 A On the screen?

23 Q Yes.

24 A 50.0 percent.

25 Q And what is the Democratic percentage of the

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1 Governor, 2016 race?

2 A 49.8 percent.

3 Q And the Republican?

4 A 50.2 percent.

5 Q How about for Governor, 2020?

6 A Fifty -- What about it?

7 Q What is the percentage outcome of that race?

8 A For the Democrat 47.3 percent.

9 Q And for the Republican?

10 A 52.5 percent.

11 Q And finally for the President, 2020 race what is the

12 Democratic outcome?

13 A 48.9 percent.

14 Q And the Republican outcome?

15 A 48.7 percent.

16 Q That metric included citizen voting age population

17 rather than voting age population; correct?

18 MS. GOLDMAN: Objection, vague.

19 A It was -- I think it was on the screen.

20 Q (By Ms. Leeper) I'll share again.

21 A Thanks.

22 Q Absolutely.

23 A Yes.

24 Q Okay. The total population is also available; yes?

25 A Adjusted, yes.

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1 Q But the voting age population is not available?

2 A I don't know what's available.

3 Q It's not included in the metrics that we just looked
4 at?

5 A Right.

6 Q Okay. Did you have a target citizen voting age
7 population when you were creating the Fain Graves proposal
8 that we looked at earlier?

9 MR. GORDON: Objection, form.

10 A Target citizen voting age population? Yeah, I think
11 so.

12 MR. HUGHES: I'm sorry, I didn't hear that.

13 THE WITNESS: Yes, I think so.

14 Q (By Ms. Leeper) And what was your target citizen
15 voting age population for Legislative District 15?

16 A My recollection? Over 50 percent.

17 Q Why?

18 A It was to justify a Hispanic district to the
19 Democratic commissioners.

20 MS. LEEPER: Could you read that back?

21 (Answer read back.)

22 Q And how did having a CVAP of over 50 percent justify
23 that district?

24 A It was the majority.

25 Q At whose direction did you have that target citizen

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1 voting age population for Legislative District 15?

2 A I don't remember specifically.

3 Q Did Commissioner Fain tell you to have that target
4 CVAP?

5 A I don't remember.

6 Q Do you recall did Commissioner Graves tell you to
7 have that CVAP target?

8 A I don't remember.

9 Q Why was it important to have a majority Latino CVAP
10 district?

11 A A lot of public testimony about having a majority
12 Hispanic district.

13 Q Did the testimony request merely having a majority
14 district?

15 A No. I think there was some -- some testimony about
16 specific numbers, I think.

17 Q And what was that testimony?

18 A I don't remember specifics.

19 Q What do you mean by specific numbers?

20 A Well, they came back with in public testimony we had
21 the study that was done, and I think that had numbers in
22 it. Obviously it did.

23 Q And what study are you referring to?

24 A The Matt Barreto one.

25 Q You mentioned earlier that you had seen the Matt

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1 Barreto report.

2 A (Nodded.)

3 Q How did you receive the Matt Barreto report in the
4 first instance?

5 A In the first instance? Probably through a newspaper
6 article.

7 Q Did anyone email you the Barreto report?

8 A Not up front, not in the first instance, no.

9 Q What about in subsequent instances?

10 A At some point somebody emailed it to me, yes.

11 Q Who?

12 A I don't know.

13 Q Would it have been a commissioner?

14 A I don't remember.

15 Q A commission staffer?

16 A I doubt it.

17 MS. LEEPER: Okay. I think now is actually
18 a good time for us to take a break.

19 (Break 2:56 p.m. to 3:11 p.m.)

20 MS. LEEPER: All right. Let's go back on
21 the record.

22 Q (By Ms. Leeper) All right, Mr. Campos, if you can
23 turn back and look at Exhibit No. 31.

24 A Yes.

25 Q Okay. Actually, scratch that.

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1 MS. LEEPER: Jeanne, did I just -- I pulled
2 up the Excel document. I just didn't mark it; is that
3 correct?

4 (Discussion with court reporter about exhibit.)

5 MS. GOLDMAN: So Counsel, I think you did
6 pull that up, but I don't think --

7 MS. LEEPER: I did pull it up, but I just
8 didn't mark it.

9 MS. GOLDMAN: -- but I don't think you
10 numbered it.

11 MS. LEEPER: Is that right?

12 MS. GOLDMAN: Yeah.

13 MS. LEEPER: Okay. Sorry. I just wanted to
14 be sure I didn't have it marked.

15 So the Excel document that we were discussing before
16 the break, --

17 MS. GOLDMAN: Well, to be clear, I think
18 what you pulled up was the Dave's Redistricting link, not
19 the Excel.

20 MS. LEEPER: Okay. Thank you. All right.
21 So --

22 MS. GOLDMAN: From Exhibit 31.

23 MS. LEEPER: Yes. So I'm going to go ahead
24 and mark the Dave's Redistricting link as 32, and then now
25 I'm going to pull up an Excel document.

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1 (Campos Exhibit No. 32 reintroduced.)

2 Q (By Ms. Leeper) So looking back at Exhibit 31, do
3 you see the attachment included in that email?

4 A Yes.

5 Q And what is the title of that attachment?

6 A LD underscore Final.

7 Q Okay. And so now I'm going to represent to you that
8 I downloaded that attachment and that it is the Excel
9 document I'm going to show you and share on the screen
10 now.

11 MS. GOLDMAN: And that will be 33?

12 MS. LEEPER: And we're going to mark this
13 as Exhibit 33.

14 (Campos Exhibit No. 33 introduced.)

15 Q (By Ms. Leeper) Now, do you see that apart from the
16 letters DD the title of this Excel document is the same?

17 A Yes.

18 Q Okay. And do you recognize this document?

19 MS. GOLDMAN: I'm going to object, calls
20 for speculation, lack of foundation.

21 If you know what this is, you can answer.

22 A It looks like the same rankings Excel spreadsheets
23 as the others.

24 MS. LEEPER: And I'm just going to state
25 for the record that some of the objections at this point

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1 are amounting to the point of coaching the witness, and
2 just move on and go ahead and ask questions about the
3 document here.

4 Q (By Ms. Leeper) All right. So looking here at the
5 Ranking Chart tab, do you see Legislative District 14 and
6 15? And pardon me, I sorted the wrong one.

7 Fourteen and 15 there?

8 A Yes.

9 Q And what is the Pellicciotti score for District 14?

10 A 42.3 percent.

11 Q And for District 15?

12 A 46.7 percent.

13 Q Okay. And moving over now to the 2020 General
14 Election tab, what is the top eight R percentage for
15 District 14?

16 A 54.8 percent.

17 Q And for District 15?

18 A 51.0 percent.

19 Q And I know I'm asking you to reach back in your
20 memory before the break, but those are all actually the
21 same numbers as the two previous mapping ranking charts
22 that we had viewed?

23 MS. GOLDMAN: Objection, calls for
24 speculation.

25 A Okay.

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1 Q (By Ms. Leeper) Were Legislative Districts 14 and 15
2 in the Fain Graves proposal from the evening of
3 November 14th and the legislative districts assessed in
4 this ranking the same districts?

5 MS. GOLDMAN: Objection, calls for
6 speculation.

7 A I don't know.

8 Q (By Ms. Leeper) Do you recall making any changes to
9 Legislative Districts 14 and 15 on the day of
10 November 15th?

11 A No, not in specific.

12 Q Okay. So I'd love to walk through with you now the
13 timeline of events of November 15th.

14 Where were you physically on the day of
15 November 15th?

16 A Was that Sunday?

17 Q That is Monday, the day of the vote.

18 A In Federal Way. Federal Way.

19 Q So you were in person on that day?

20 A Yes.

21 Q Who was with you in person throughout that day?

22 A Throughout the day who was with me? A number of
23 people.

24 Q Were you with Commissioner Fain?

25 A Yes.

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1 Q Commissioner Graves?

2 A Yes.

3 Q Anton Grose?

4 A Yes.

5 Q Ali O'Neil?

6 A Yes.

7 Q Osta Davis?

8 A I don't remember Osta specifically that day.

9 Q Dominique Meyers?

10 A Oh, yeah, they would have been in the larger room,

11 yeah.

12 Q What about Commissioner Sims?

13 A She was also there.

14 Q And Commissioner Walkinshaw?

15 A Yes.

16 Q Were you drawing maps on November 15th, 2021?

17 A Yeah, likely.

18 Q With what platform or software were you creating

19 maps on November 15th?

20 A Edge.

21 Q Did you upload any maps to Dave's Redistricting to

22 look at the CVAP percentages on November 15th?

23 A No.

24 Q Who was creating maps with you on November 15th?

25 MS. GOLDMAN: Objection as to form, vague.

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1 A I was creating maps. Anton was in the room. The
2 commissioners may have been in the room.

3 Q (By Ms. Leeper) When you were creating maps
4 throughout the day on November 15th who did you give the
5 maps or show the maps to to receive feedback?

6 A If I was making maps, probably -- Definitely
7 Commissioner Fain.

8 Q Did you also show any of those maps to
9 Commissioner Graves?

10 A I don't remember that.

11 Q How did you share the maps that you created on
12 November 15th?

13 A Either on my laptop -- On the 15th? Probably on my
14 laptop.

15 Q And so not over email?

16 A Not the maps, no, not that I remember.

17 Q How about any other messaging platforms?

18 A No.

19 Q Did you use any software other than Dave's to look
20 at CVAP percentage of maps on November 15th?

21 A I didn't use Dave's much, and -- No, I guess.

22 Q So you did not look at CVAP of any districts on
23 November 15th?

24 A I didn't.

25 Q Were you present when other people were looking at

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1 CVAP?

2 MS. GOLDMAN: Objection, lack of
3 foundation, calls for speculation.

4 MS. LEEPER: I'm merely asking if he was
5 present, Counsel.

6 MS. GOLDMAN: I merely objected that he
7 lacks foundation.

8 Q (By Ms. Leeper) You can answer the question.

9 A What was the question again? Sorry.

10 Q Were you present when anyone else was looking at
11 CVAP --

12 A Sure.

13 Q -- percentages for maps on November 15th?

14 A Yes.

15 Q Who?

16 A Who was present?

17 Q Who was looking at CVAP percentages?

18 A Anton would have been, I think.

19 Q And was he using Dave's to look at those CVAP
20 percentages?

21 A Yes.

22 Q Was he uploading maps that you created to look at
23 the CVAP percentages in Dave's?

24 MS. GOLDMAN: Objection, calls for
25 speculation.

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1 A I don't remember. I think so.

2 Q (By Ms. Leeper) Where was Commissioner Fain on the
3 day of November 15th?

4 A He was also in Federal Way.

5 Q And how much of the time would you say that you were
6 in person with Commissioner Fain?

7 A On Monday?

8 Q Yes.

9 A I would guess 80 percent.

10 Q When you were with Commissioner Fain did he have any
11 meetings with other commissioners?

12 A Did he? Yes.

13 Q Who?

14 A Commissioner Graves.

15 Q Did he have any meetings with Commissioner
16 Walkinshaw?

17 A Yeah, he would have, and -- Yeah.

18 Q You said he would have. Why?

19 A Well, they were meeting with each other one on one,
20 and I was present for some of those.

21 Q What was the subject of the meetings that you were
22 present for?

23 A One that I remember specifically was the
24 congressional district map.

25 Q Do you remember them talking about the legislative

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1 districts?

2 A Not specifically, no.

3 Q What was your understanding of where the
4 negotiations stood on Legislative Districts 14 and 15 on
5 the morning of November 15th?

6 A I wouldn't -- I wouldn't know.

7 Q Are you aware of any mapping conversations that took
8 place between the commissioners on the morning of
9 November 15th?

10 A Am I aware of any -- No, I don't think so.

11 Q Did you have any meetings, conversations or mapping
12 sessions with commissioners on the morning of
13 November 15th that related to Legislative Districts 14 or
14 15?

15 MS. GOLDMAN: Objection, compound.

16 A Yes.

17 Q (By Ms. Leeper) What meetings did you have on the
18 morning of the 15th that related to the Legislative
19 Districts 14 and 15?

20 A I'm sure we talked about the lines there.

21 Q What specifically about the lines?

22 A I can't recall specifically.

23 Q What do you remember about conversations between the
24 Commissioners on November 15th having to do with
25 Legislative Districts 14 and 15?

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1 A Not very much.

2 Q What is the not very much that you remember?

3 A I don't remember. I know they were having
4 conversations, but other than that I couldn't tell you
5 what.

6 Q What do you remember about conversations that you
7 were present for or engaged in with other commission
8 staffers about Legislative Districts 14 and 15?

9 A I don't remember anything.

10 Q Can you tell me everything you know about the
11 negotiations regarding Legislative Districts 14 and 15 on
12 the day of November 15th?

13 MR. HUGHES: Form.

14 A Every -- I don't know. I wasn't privy to those
15 conversations.

16 Q (By Ms. Leeper) So you weren't present for any
17 conversations with Commissioner Fain where Legislative
18 Districts 14 and 15 were discussed on that day?

19 MS. GOLDMAN: That's a different question.

20 MR. GORDON: Objection, form.

21 Q (By Ms. Leeper) What conversations were you privy to
22 on November 15th to do with Legislative Districts 14 and
23 15?

24 A Conversations amongst me and Anton and probably with
25 Commissioner Fain about where those lines would be drawn.

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1 Q And what specifically were you discussing with Anton
2 about where those lines should be drawn?

3 A Definitely the boundary for the Yakama Nation, where
4 and how much to cut up municipal districts, municipal
5 areas, that sort of thing.

6 Q Did you have discussions with Anton regarding the
7 electoral performance of Legislative Districts 14 or 15?

8 A We would -- Yeah, we would have looked at the same
9 numbers.

10 Q Did you have any discussions with Commissioner Fain
11 on that day about the legislative performance of Districts
12 14 or 15?

13 A Yes, likely same thing.

14 Q And what was the content of those conversations?

15 A Whether they were more or less Republican.

16 Q And what was Commissioner Fain's stance on whether
17 the districts should be more or less Republican?

18 MS. GOLDMAN: Objection as to form.

19 A Well, they should -- He was -- What was his stance
20 on Districts 14 and 15? He was mostly wanting to try and
21 get to a deal.

22 Q (By Ms. Leeper) And what did that mean with regard
23 to Legislative Districts 14 and 15?

24 A That if it suffered a little bit Republican-wise
25 that, you know, he might have to live with that.

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1 Q What does suffer a little bit mean?

2 A Lose percentages.

3 Q Was there a threshold below which Commissioner Fain
4 did not want the percentages to fall?

5 A I don't know.

6 Q Did he express to you that he wanted the percentages
7 to stay above a certain marker?

8 A Not that I remember.

9 Q Did he express that he wanted Legislative Districts
10 14 and 15 to remain Republican leaning?

11 A I don't remember that.

12 Q What conversations do you remember with Anton Grose
13 surrounding Legislative Districts 14 and 15 on the day of
14 November 15th?

15 MR. GORDON: Objection, form.

16 A How they perform politically and probably, you know,
17 the CVAP number that he could access.

18 Q (By Ms. Leeper) And what was Anton Grose's position
19 regarding the CVAP number of the district?

20 A Why it should be a majority, I would think. I don't
21 know what his stance was. Sorry.

22 Q Why was the Yakama Nation boundary important?

23 A It's a pretty clearly defined community of interest.

24 Q Were there discussions regarding any other
25 communities of interest in Legislative Districts 14 and 15

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1 on November 15th?

2 A Well, the Hispanic population.

3 Q And with whom did you have discussions related to
4 the Hispanic population in Legislative Districts 14 and 15
5 on November 15th?

6 A Anton definitely. Maybe Fain. I don't remember.

7 Q What did Anton say about the Hispanic population in
8 Legislative Districts 14 and 15?

9 A I don't remember specifically.

10 Q On the day of November 15th how did you measure how
11 much the Republicans would suffer in Legislative Districts
12 14 and 15?

13 A By the percentage of -- the percentage drop in the
14 Republican performance amongst --

15 Q Were there final maps presented to the public on
16 November 15th that received any public input?

17 A I don't know that.

18 Q Was there a public comment period on the final maps?

19 A I don't know.

20 Q Part of your duties in the 2021 redistricting cycle
21 included reviewing public comments; correct?

22 A Yes.

23 Q Did you review any public comments submitted on the
24 final maps prior to their passage?

25 A Not that I remember, no.

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1 Q Did you disseminate any of the maps that were being
2 drafted on November 15th to parties outside of the
3 commission and commission staff?

4 A No, I don't think so.

5 Q Did you witness Anton Grose disseminating any maps
6 drawn on November 15th to parties outside of the
7 commission and commission staff?

8 A No, not that I remember.

9 Q On the evening of November 15th, 2021
10 Commissioner Sims made a proposal for a final plan to
11 Commissioners Graves and Fain; is that correct?

12 A I don't know.

13 Q What do you know about the final hours before a
14 final map was voted upon?

15 A That it was slow and chaotic.

16 MR. HUGHES: Object to form.

17 MS. GOLDMAN: I'm sorry?

18 MR. HUGHES: I said object to form.

19 MS. GOLDMAN: Go ahead.

20 A That it was slow and chaotic. That's what I
21 remember.

22 Q (By Ms. Leeper) What details do you remember about
23 the final hours before the vote on the map?

24 A I don't remember many details.

25 Q What are the details that you do remember?

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1 A That we all gathered in a room, and the staff got
2 together and drew up a plan that would comport to what
3 they had agreed to.

4 (Court reporter request to keep voice volume up.)

5 Q And who is "we all"?

6 A The redistricting staff on the caucus side.

7 Q And what are the names of those individuals?

8 A Me, myself, Anton, Osta, and Ali.

9 Q When you say that you were drawing a map to match
10 what the commissioners had agreed to, when was that
11 agreement reached?

12 A I don't know.

13 Q When did you start drawing that map?

14 A Pretty late in the evening.

15 Q Would you say before or after 9:00 p.m.?

16 A I would say I don't remember.

17 Q Do you know if it was before or after 5:00 p.m.?

18 A I don't -- I don't think so. I don't think it was
19 before 5:00 p.m.

20 Q So you think it was after 5:00 p.m.?

21 A I think (nodded).

22 Q Okay. What were the contours of the final agreement
23 that you say the commissioners came to as it related to
24 Legislative Districts 14 and 15?

25 MR. HUGHES: Object to form.

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1 Q (By Ms. Leeper) You can answer.

2 A Well, yeah, I'm just thinking about the question.

3 What were the contours?

4 I think they'd agreed to 14 and 15, and that was not
5 going to change; and we would draw around that, basically.

6 Q So what were the contours of the 14 and 15 that they
7 had agreed to?

8 A I don't remember. I'm sorry.

9 Q Do you remember anything about the 14 and 15 that
10 was agreed to?

11 A Not really, no.

12 Q Okay. Let's focus in on the commission's final
13 vote, the vote on a final proposal that occurred around
14 midnight on November 15th, 2021.

15 The vote on that final proposal occurred after
16 midnight November 16th; correct?

17 A I don't know.

18 Q The deal that was agreed to and voted upon was not a
19 vote on an actual final legislative map; correct?

20 A There wasn't a map, no.

21 Q So it was a vote on a proposal for a map?

22 A Yes.

23 Q When did you and the other staffers finish the
24 actual map?

25 A I want to say late the next morning.

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1 Q Before or after 2:00 a.m.?

2 A Probably -- I know definitely after.

3 MS. GOLDMAN: I'm sorry.

4 A Definitely after, I think.

5 Q (By Ms. Leeper) And so was it a situation where you
6 went home and went to sleep and came back and worked on
7 that map?

8 A No.

9 Q So you remained there working on the map?

10 A Yes.

11 Q Okay. So before or after 3:00 a.m.?

12 A Yes.

13 Q Did you finalize the map before or after 3:00 a.m.?

14 A Oh, after.

15 Q Before or after 4:00 a.m.?

16 A After.

17 Q 5:00 a.m.?

18 A After.

19 Q 6:00 a.m.?

20 A I don't remember.

21 Q You mentioned earlier that the room where that map
22 was being drawn was filled with the commission staffers.

23 Were any of the commissioners present?

24 A I don't think I said that. There were commissioners
25 in the room, yes.

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1 Q Which commissioners were in the room as that map was
2 being drawn?

3 A All of them, I think.

4 Q Did the commissioners ultimately all come to a
5 consensus on an actual map?

6 A Yes.

7 Q And when was that consensus reached?

8 A I don't know.

9 Q When that map was being drawn up were the
10 commissioners commenting on what should be done with the
11 map?

12 A Yes.

13 Q Were any comments being made about Legislative
14 Districts 14 and 15?

15 A Not that I remember.

16 Q It was then Commissioner Fain's position that the
17 deadline for the redistricting commission to finalize a
18 legislative district plan had passed without a vote on the
19 final plan; correct?

20 MS. GOLDMAN: Objection, calls for
21 speculation, lack of foundation.

22 A I don't know.

23 Q (By Ms. Leeper) I'm going to pull up, actually
24 hand you what we're going to be marking as Deposition
25 Exhibit 34.

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1 (Campos Exhibit No. 34 introduced.)

2 Q I want to step back for a second before we look at
3 this exhibit and ask you a question. Earlier you said
4 that the final hours before the map was passed were
5 chaotic.

6 A Um-hmm.

7 (Reporter request to answer verbally.)

8 A Yes.

9 Q What does that mean to you?

10 A There seemed to be a lot of people running around
11 trying to get stuff done.

12 Q Were any commissioners in particular holding out at
13 that point?

14 A I don't know what the commissioners were doing.

15 Q When you were working with the staffers at that
16 point did the staffers represent to you any particular
17 requirements that their commissioner needed that your
18 commissioner was not able to provide?

19 A I don't remember that.

20 Q All right. Let's take a look at this exhibit
21 together. Have you had a chance to review it?

22 A Oh, this one? Yes.

23 Q Do you recognize this document?

24 A Yes.

25 Q What is it?

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1 A It's a -- excuse me -- an email from me to
2 Senator Fain, including a briefing on redistricting.

3 Q And when is this email from?

4 A Wednesday, November 17th.

5 Q And at what time?

6 A 11:53 p.m.

7 Q Did you draft the briefing that's included as an
8 attachment here?

9 A Yes.

10 Q I'm going to hand you our last exhibit, which we'll
11 be marking as Deposition Exhibit 35. And I'll give you a
12 moment to review that. Let me know when you're done.

13 (Campos Exhibit No. 35 introduced.)

14 Q Have you had a chance to review the document?

15 A Yes. Quality work.

16 (Court reporter request for clarification.)

17 A Quality work. I'm sorry.

18 Q Do you recognize this document?

19 A Yes.

20 Q What is it?

21 A It's a PowerPoint presentation for Senator Fain to
22 offer to the Republican caucus regarding the recently
23 passed legislative and congressional district plans.

24 Q And you drafted this; correct?

25 A Yes.

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1 Q Did Commissioner Fain approve of it?

2 A I don't think he -- No.

3 Q Did he ever present it?

4 A I don't think he did, no.

5 Q Let's look at slide seven, the header "Commission-
6 Approved Redistricting Plan, 2021."

7 MS. GOLDMAN: I'm sorry, Counsel, what
8 page?

9 MS. LEEPER: It is going to be page 3 --
10 four, and it's slide No. 7; so it will be the top of
11 page 4, and the headline is -- The title page is
12 "Commission-Approved Redistricting Plan, 2021."

13 A And I amend my previous comment, not so quality
14 work, no page numbers.

15 Q (By Ms. Leeper) Do you see this page?

16 A Yes, I do.

17 Q Now, if you can read it -- and if you can't, let me
18 know and I'll share my screen so it will be a bit bigger
19 text. In the chart depicting the 2021 redistricting
20 process what is the description next to the date
21 November 15th, 2021?

22 A Commission deadline passes.

23 Q And what is the next date and description included
24 in that chart?

25 A That one I can't read. April 30th?

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1 Q And what is the description for that?

2 A I think it has to do with the Supreme Court
3 deadline.

4 Q Yes, it says, "Deadline by which State Supreme Court
5 shall adopt a redistricting plan."

6 A Right.

7 Q What did you mean by commission deadline passes?

8 A That the commission -- That was the commission
9 deadline.

10 Q And what did you mean by it passing?

11 A After that there's no -- The commission can't act.

12 Q And what was the purpose of including the April 30th
13 Supreme Court deadline?

14 A So that there was -- members would know if that went
15 to the Supreme Court, what deadline they had to approve a
16 new plan.

17 Q You mentioned earlier that you were also involved in
18 the Washington legislative redistricting process in the
19 1991, 2001 and 2011 redistricting cycles; is that correct?

20 A Yes.

21 Q In the 2001 cycle did the commission vote on and
22 approve a final legislative map on or before the required
23 deadline?

24 A Did they vote on one?

25 Q Um-hmm.

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1 A I believe they did.

2 Q How about in 1991?

3 A Did you say 2001?

4 Q I started with 2001. I should have gone
5 chronologically.

6 A Sorry. 2001 -- And the question was what again?

7 Q Let's start at the beginning.

8 A Okay.

9 Q In the 1991 redistricting cycle did the commission
10 vote on and approve a final legislative district's map on
11 or before the required deadline?

12 A I don't -- I believe so.

13 Q In the 2001 cycle did the commission vote on and
14 approve a final legislative district's map on or before
15 the required deadline?

16 A My recollection is no.

17 Q And in the 2011 cycle did the commission vote on and
18 approve a final legislative district's map on or before
19 the required deadline?

20 A I wasn't involved at that end, but I don't think
21 they did.

22 I'm sorry. Can you restate that last question
23 again?

24 Q The question is if in 2011 the commission voted on
25 and approved a final legislative district's map on or

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1 before the required deadline.

2 A I wasn't involved. I don't remember that period.

3 Q Okay. So you don't know.

4 When you were working with the 2021 commission did
5 you hear any criticism of the commission as operating
6 behind closed doors?

7 A I don't remember specifically.

8 Q With your work in the 1991 redistricting process did
9 the commission ever look into whether a majority Latino
10 CVAP state legislative district could be drawn in the
11 Yakima Valley and Pasco region?

12 A In 1991?

13 Q Yes.

14 A I don't recall.

15 Q How about in 2001?

16 A I don't think so. No, I don't remember.

17 Q All right. Well, I'd like to take -- Actually, I'm
18 going to ask a few more questions. I want to get back to
19 basics a little bit and talk about your process of drawing
20 maps.

21 What are you looking at in the Edge platform when
22 you're drawing a map?

23 A In Edge I'm looking at state boundaries, county
24 lines, block boundaries, block group boundaries, track
25 lines, geography, natural geographies, rivers, mountains.

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1 Q Were the elections and the results that you uploaded
2 visible when you were drawing the maps?

3 A Yeah.

4 Q What about the ethnicity and race of districts?

5 A Yes.

6 Q And that would be for voting age population;
7 correct?

8 A That was included.

9 Q Yes.

10 A It wasn't always visible.

11 Q So sometimes you drew a map without including the
12 voting age population?

13 A Every map has voting age population in it.

14 Q Did you sometimes draw maps and not have visible the
15 --

16 A Right.

17 Q -- voting age population broken down by race?

18 A Right. Yes.

19 Q And you said that sometimes, though rarely, you also
20 drew maps through Dave's; is that correct?

21 A I might have drawn one map. I don't remember that,
22 beyond that.

23 Q Okay. But whenever you did upload a map that you
24 drew to Dave's it was to look at the citizen voting age
25 population?

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1 A That would have been the only reason I would have
2 used Dave's.

3 Q Okay. And so there was nothing else you would look
4 at on Dave's?

5 A Not really.

6 I should back up. I did look at Dave's to recreate
7 his measure or their measure on Edge to the degree I
8 could.

9 Q Could you explain a little bit more about what that
10 means?

11 A So Dave's Redistricting has a number of metrics, and
12 I forget what they were, but I think he took the
13 combination of like top four, three -- I don't know what
14 they were -- across various years, different races. I
15 then replicated -- tried to replicate that in Edge so I
16 wouldn't have to worry about Dave's.

17 Q Okay. But you never tried to replicate the citizen
18 voting age population function of Dave's in Edge?

19 A I couldn't.

20 Q Okay. Why not?

21 A That information is not in Edge. He has -- Dave has
22 a 2019 CVAP database that was not included in Edge.

23 Q Okay. All right. So I think that is --

24 MS. LEEPER: Let's go ahead and go off the
25 record.

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1 (Discussion off the record.)

2 (Break 3:50 p.m. to 4:00 p.m.)

3 MS. LEEPER: All right. I think everyone
4 is here for us to hop back on the record.

5 Q (By Ms. Leeper) Mr. Campos, just a few more
6 questions for you.

7 A This much (indicating).

8 Q Were there any metrics visible to you while you were
9 map drawing that you haven't yet mentioned?

10 MS. GOLDMAN: Objection as to form, vague.

11 A I tried to put in every metric I could in there,
12 yes. Yes.

13 Q (By Ms. Leeper) Okay. So we discussed earlier that
14 when you're map drawing in Edge you could see voting age
15 population; correct?

16 A Sometimes -- Voting age population is in there. I
17 didn't always see it.

18 Q And you at times would view the voting age
19 population; correct?

20 A Yes.

21 Q You obviously always would view the total
22 population?

23 A Total population, yes.

24 Q Would you always have the electoral results of the
25 elections that you uploaded visible?

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1 A Yes.

2 Q Did that include visible results for the election
3 conglomerations, like top eight or top four?

4 A Yes.

5 Q And it also included individual elections?

6 A In the database? Yes.

7 Q Were there any metrics that you were sure to always
8 have open when map drawing?

9 A District number and population.

10 Q Were there any metrics that we haven't mentioned up
11 to this point that you had available and sometimes used in
12 Edge when map drawing?

13 A What was the question again?

14 MS. LEEPER: Could you read it back?

15 (Question read back.)

16 A Sometimes used? All the demographic variables were
17 in there. Occasionally I would look at one or another.

18 Q (By Ms. Leeper) And when you say all the demographic
19 variables, what does that mean?

20 A White, non-Hispanic white. The demographic value
21 Black, Asian, American Indian, Native Hawaiian, Pacific
22 Islander.

23 (Court reporter request to speak up.)

24 A Sorry. Asian, Indian, Native Hawaiian, Pacific
25 Islander, and then a similar set, only at the CVAP voting

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1 age level. That's what I can recall.

2 Q Did you ever view electoral performance by race or
3 ethnicity while map drawing?

4 A Electoral performance by race? No.

5 Q Did you ever view electoral performance by race or
6 ethnicity when assessing maps after they were made?

7 A No.

8 MS. LEEPER: Okay. Mr. Campos, that is all
9 the questions that I have for you today.

10 I believe that the intervenors have said that they
11 have a few questions for you. And plaintiffs' counsel
12 just wants to note for the record that we've confirmed
13 that Mr. Gordon is representing the defendant intervenors
14 in these questions and no other party; and we'll go ahead
15 and just let him know that the plaintiffs will be
16 objecting to any questions, of course, that are made
17 outside of the scope of what's been testified to in the
18 deposition up until this point.

19 And with that it is your witness.

20 MR. GORDON: Thank you. Your intent to
21 object to my questions is noted.

22 E X A M I N A T I O N

23 BY MR. GORDON:

24 Q Hello, Mr. Campos. How are you doing today?

25 A Fine.

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1 Q As best -- As good as can be expected, I assume.

2 A Exactly.

3 Q Well, I'll try to make this short and as painless as
4 possible.

5 Earlier in your deposition you were discussing
6 Hispanic and Latino, and I believe counsel represented
7 that they were going to mean the same thing.

8 Are you aware how the United States Census Bureau
9 defines Hispanic?

10 A I probably read the definition, yes.

11 Q Okay. Now, did the commission use census data?

12 A Yes.

13 Q And according to the Census Bureau is Hispanic a
14 race or ethnicity?

15 A It's an ethnicity.

16 Q So, for instance, you can be a Black Hispanic; is
17 that right?

18 A Yes.

19 Q A white Hispanic?

20 A Yes.

21 Q Asian Hispanic, for instance?

22 A Yes.

23 Q Native American Hispanic?

24 A Yes. Other.

25 Q Thank you. Now, moving on topics. To the best of

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1 your knowledge do Hispanics tend to vote more for
2 Democrats or Republicans in the state of Washington?

3 MS. LEEPER: Objection, calls for
4 speculation.

5 A I would -- I would -- I don't know.

6 Q (By Mr. Gordon) Okay. Now, moving on specifically
7 to District 14, to the best of your knowledge is the
8 current representative of District 14 responsive to the
9 needs of the Hispanic community?

10 MS. LEEPER: Objection, calls for
11 speculation.

12 A As far as I know, yes.

13 Q (By Mr. Gordon) And now moving on to District 15, to
14 the best of your knowledge is the current representative
15 of District 15 responsive to the needs of the Hispanic
16 community of that district?

17 MS. LEEPER: Objection, calls for
18 speculation, and also objection to form.

19 A Yeah, I wouldn't know, I guess.

20 Q (By Mr. Gordon) Moving ever onward, I've heard a
21 number of references to a Pellicciotti. I'm sure I'm
22 butchering that name.

23 Who is Pellicciotti?

24 A He's the -- He was a Representative in the State
25 House. He ran for treasurer and won in 2020.

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1 Q Okay. And was Pellicciotti a Republican or
2 Democrat?

3 A A Democrat -- still is.

4 Q And he was when he was elected to treasurer; is that
5 right?

6 A Yes.

7 Q And to the best of your knowledge does the fact that
8 Pellicciotti received, for example, 51 percent of the vote
9 in a certain map configuration mean that all Democrats
10 would receive the same percentage --

11 MS. LEEPER: Objection to form.

12 Q (By Mr. Gordon) -- of Democratic voting?

13 A No, not necessarily.

14 Q So based on your experience and knowledge, voters
15 tend to care who the candidate is; is that right?

16 A Yeah.

17 MS. LEEPER: Objection, calls for
18 speculation.

19 A Yes.

20 Q (By Mr. Gordon) Go ahead and answer. Thank you.

21 So moving on to the enacted map, the enacted map of
22 the Yakama Nation is in District 14; is that right?

23 A Yes, I believe so.

24 Q And to the best of your knowledge is the Yakama
25 Nation generally happy with their current district?

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1 MS. LEEPER: Objection, calls for
2 speculation, and object to form.

3 MR. HUGHES: And lack of foundation.

4 A It would be what they asked for, so yes, I would
5 think -- they being the Council.

6 Q (By Mr. Gordon) The Tribal Council?

7 A Yes.

8 Q So jumping ever onward. To the best of your
9 knowledge is there a requirement in Washington that
10 Democrats win certain legislative districts?

11 MS. LEEPER: Objection, form.

12 A No.

13 Q (By Mr. Gordon) To the best of your knowledge is
14 there a requirement in Washington that Republicans win
15 certain legislative districts?

16 MS. LEEPER: Object to form.

17 A No.

18 Q (By Mr. Gordon) To the best of your knowledge is
19 there a requirement of federal law that Democrats win
20 certain legislative districts?

21 MS. LEEPER: Objection, form.

22 MS. GOLDMAN: Objection, calls for a legal
23 conclusion.

24 A No.

25 Q (By Mr. Gordon) And to the best of your knowledge is

1 there a requirement in federal law that requires the
2 election of Republicans to certain legislative districts?

3 MS. LEEPER: Object to form.

4 MS. GOLDMAN: Objection, calls for a legal
5 conclusion.

6 A No, not that I know of.

7 Q (By Mr. Gordon) Okay. And to deal with the calls
8 for a legal conclusion question, when you were drafting
9 maps you had to be generally aware of the federal and
10 state rules regarding map drawing; is that right?

11 MS. LEEPER: Object to form.

12 A I tried to be aware of the constitutional -- state
13 constitutional and statutory requirements.

14 Q (By Mr. Gordon) Okay. Fair enough.

15 So plaintiffs' counsel today had you look at a
16 number of maps and did a bit of a show and tell with maps
17 and spreadsheets. Of the maps we looked at today, what
18 map was the enacted map?

19 A I don't know.

20 MS. GOLDMAN: Objection, calls for
21 speculation.

22 A I don't know.

23 Q (By Mr. Gordon) So any of the maps that plaintiffs'
24 counsel showed you today, were any of them eventually
25 enacted and are now law in the state of Washington?

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1 MS. GOLDMAN: Objection, calls for
2 speculation.

3 A Yeah, without looking at it I wouldn't know.

4 Q (By Mr. Gordon) Okay. How about this, make it more
5 personal. Were any of the maps that you drafted for Fain
6 for the legislature enacted into law?

7 A Were any of the maps that I drew?

8 Q Correct.

9 A No. Well, sorry. Legislatively or congressionally?

10 Q Legislative.

11 A No.

12 MS. LEEPER: We're just going to object to
13 form retroactively.

14 MR. GORDON: Great. That's all from me.

15 MS. LEEPER: Okay. And I think with that
16 we are --

17 MR. HUGHES: Nope.

18 MS. LEEPER: Oh, pardon me.

19 MR. HUGHES: I've got some questions as
20 well.

21 THE WITNESS: What?

22 MR. HUGHES: Mr. Campos, it's a little bit
23 awkward for me to be asking you questions like this. Is
24 this okay, --

25 MS. LEEPER: Do you want to switch?

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1 THE WITNESS: I can just watch you here.

2 MR. HUGHES: It's really up to you.

3 MS. LEEPER: I don't mind at all.

4 MR. HUGHES: Yeah, let's do that. Sorry.

5 I want to go off the record for a second.

6 MS. LEEPER: I was going to say let's hop
7 off.

8 (Discussion off the record.)

9 MR. HUGHES: All right. Are we good to go
10 back on?

11 THE REPORTER: Yes.

12 MR. HUGHES: All right.

13 E X A M I N A T I O N

14 BY MR. HUGHES:

15 Q Good afternoon, Mr. Campos. How are you?

16 A Good.

17 Q I'm Andrew Hughes from the State Attorney General's
18 Office.

19 A Right.

20 Q We met just very briefly earlier today.

21 Can you let me know where you're from?

22 A Originally?

23 Q Yeah.

24 A Born in Toppenish, raised on the -- in Harrah.

25 Q And is Harrah in the Yakama Nation?

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1 A Yes.

2 Q Was there anyone else involved in the redistricting
3 process who is from the Yakima Valley?

4 A Not that I'm aware of.

5 Q Do you know by chance where Commissioner Augustine
6 was from?

7 A Oh, --

8 MS. LEEPER: Objection, calls for
9 speculation.

10 A I think the Southwest.

11 Q (By Mr. Hughes) Okay. Did you feel like being
12 from -- Oh, go ahead.

13 A That's where she was from. She lives in Yakima --
14 in the Valley.

15 Q Oh, okay. Sorry. Fine.

16 Were you aware of anyone else related -- working on
17 the commission who either is from or lives in the Yakima
18 Valley?

19 A Not that I'm remembering at the moment.

20 Q Did you feel like being from the Yakima Valley gave
21 you any insight into what the community was like and, you
22 know, what the communities of interest were there?

23 MS. LEEPER: Objection, calls for
24 speculation, and form.

25 A Yes.

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1 Q (By Mr. Hughes) And what sort of insight do you feel
2 like you had being from the Yakima Valley?

3 A That I grew up there, I could see where people
4 normally travel to day to day.

5 Q Okay. So I've got a bunch of followup questions, so
6 it's going to jump around a little bit. I apologize for
7 that.

8 You mentioned very early on in the deposition that
9 you searched for records in connection with a Public
10 Records Act lawsuit. Do you remember that?

11 A Yes.

12 Q Do you happen to remember the name of that lawsuit?

13 MS. GOLDMAN: I do.

14 A Yeah, Washington Coalition v. The Commission, I
15 think.

16 Q Okay. So that was the WashCOG lawsuit?

17 A Yes, I believe so.

18 Q Do you have any reason to think that was a PRA
19 lawsuit and not an Open Public Meetings Act lawsuit?

20 MS. LEEPER: Objection, calls for
21 speculation and a legal conclusion.

22 MS. GOLDMAN: I join the objection.

23 A Yeah, I'm not sure about that.

24 Q (By Mr. Hughes) Let me ask it a better way. Do you
25 know whether that lawsuit was under the PRA or under the

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1 Open Public Meetings Act, or something else?

2 MS. LEEPER: Same objection.

3 A I don't know.

4 Q (By Mr. Hughes) Okay.

5 A Sorry.

6 Q But it was the Washington Coalition for Open
7 Government lawsuit?

8 A That's my belief, yes.

9 Q Okay. Did you receive a subpoena -- Oh, go ahead.

10 A Because it was merged with West; right? I mean, --

11 Q Correct.

12 A Yeah. Okay.

13 Q I shouldn't say correct. I don't know.

14 So you recall this lawsuit being merged with another
15 lawsuit --

16 A Yeah.

17 Q -- brought by Arthur West?

18 A Yeah.

19 Q Okay. Did you receive a subpoena to produce
20 documents in connection with this lawsuit?

21 A No, not that I know of.

22 Q Okay. I'm going to really test your memory here.

23 In the first hour of the deposition Simone asked you some
24 questions about voting patterns.

25 Do you remember those questions?

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1 A No. Sorry.

2 Q Okay. Well, rats.

3 What do you understand the term voting patterns to
4 mean?

5 A Just --

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

8 Go ahead if you can answer.

9 A Voting patterns, whether people tend to vote a
10 certain way or not over time.

11 Q (By Mr. Hughes) Okay. Any more specificity than
12 that?

13 A No.

14 Q Okay. That's fair.

15 You mentioned earlier speaking with someone named
16 Mr. Crandall. Do you recall that?

17 A Yes.

18 Q Did Mr. Crandall ever provide any sort of comments
19 or feedback on the Voting Rights Act?

20 MS. GOLDMAN: Okay. I'm going to again
21 instruct you regarding the attorney-client privilege.

22 To the degree that Mr. Crandall provided you
23 information that was legal advice or in response to
24 questions about law, I'm instructing you not to answer the
25 question.

1 If there is anything else that he -- other
2 information he provided to you that is responsive to this
3 question, you may answer.

4 A Yeah, I don't think I can answer then.

5 Q (By Mr. Hughes) Okay. Fair.

6 Do you recall whether Mr. Crandall ever gave you any
7 guidance or feedback on the subject of racially polarized
8 voting?

9 MS. GOLDMAN: And I'm going to give you the
10 same instruction as before. If there is anything that you
11 can answer that is not legal advice or inquiry about the
12 law, you may answer it. Otherwise I'm instructing you not
13 to answer.

14 A Yeah, I don't think I can answer.

15 Q (By Mr. Hughes) Okay. Fair. And hopefully the last
16 question on this line.

17 Do you recall if Mr. Crandall ever provided you any
18 sort of guidance or feedback on any issues related to
19 compactness vis-a-vis any districts in the Yakima Valley?

20 MS. GOLDMAN: Same instruction to you. If
21 you can answer that question without providing legal
22 advice or questions regarding the law, you may do so.
23 Otherwise I'm instructing you not to answer on the basis
24 of the attorney-client privilege.

25 A I'm going to say I don't remember that detail.

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1 Q (By Mr. Hughes) Okay. Fair enough.

2 So I'd like to have you pull out Exhibit 4 again.

3 Do you still have that with you? It looks like this, or
4 like this when you're watching at home.

5 Do you have that in front of you?

6 A Yes.

7 Q So I believe --

8 MS. GOLDMAN: Was this Exhibit 4? Sorry.

9 MR. HUGHES: Yes, Exhibit 4.

10 MS. GOLDMAN: Okay. Thank you.

11 Q (By Mr. Hughes) I apologize if this was already
12 asked, but was this the presentation that Commissioner
13 Fain gave at the -- I think it's the SRC, the caucus
14 meeting in June of 2021?

15 A Yeah, I believe it is.

16 Q Do you remember this presentation being given?

17 A Yeah.

18 Q What do you remember about that presentation?

19 A That -- What do I remember about it? He just gave
20 the members a briefing. He -- I just ran the PowerPoint.

21 Q Sure. Were there any followup questions that you
22 recall?

23 A Not specifically, no.

24 Q Do you recall if there was any discussion about the
25 presentation?

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1 A Not that I remember.

2 Q Okay. You can put that aside.

3 So I want to pull out Exhibit 8 again, if you have
4 that on hand. And Exhibit 8 -- Well, I'll ask you what
5 Exhibit 8 is rather than telling you.

6 Do you recall seeing this exhibit, Mr. Campos?

7 A Earlier today? Yes.

8 Q And was this the public maps that Commissioner Fain
9 posted in September of 2021?

10 A That's what I'm told.

11 Q That's fair.

12 Do you recall that there was a delay in receiving
13 certain census data from the Census Bureau?

14 A Yeah.

15 Q And what do you recall about that delay?

16 A We had the pandemic. There was a delay in the
17 count, so they delayed reporting the block group, the
18 block number populations to the states.

19 Q And did that affect your ability to look at citizen
20 voting age population?

21 A The delay?

22 Q Yes.

23 A No.

24 Q No? So you had citizen voting age population from
25 the census -- Let me -- Strike that.

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1 At the time you were drawing this map do you recall
2 whether you had citizen voting age population from the
3 Census Bureau?

4 A The Census Bureau didn't report citizen voting age
5 population in 2021.

6 Q Okay.

7 A It would have been in 2019 in the survey.

8 Q Okay. So did you have any updated --

9 A No.

10 Q Okay.

11 A No.

12 Q You mentioned that you worked for Commissioner Fain;
13 is that right?

14 A No.

15 Q Sorry. You mentioned you assisted Commissioner
16 Fain; is that right?

17 A Yes. Yes.

18 Q Was Commissioner Fain primarily responsible for
19 drafting -- for negotiating part of the state legislative
20 districts?

21 MS. LEEPER: Objection, calls for
22 speculation.

23 A The four commissioners were.

24 Q (By Mr. Hughes) Okay.

25 A The four voting commissioners.

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1 Q And you mentioned previously -- I don't know if you
2 used the concept of a dyad.

3 Is that a term you're familiar with?

4 A Yes.

5 Q And what does dyad mean with respect to the
6 redistricting commission work?

7 A It was a proposal to have each of the two of the
8 four members meet jointly to discuss different areas and
9 different concerns about the district plans.

10 Q And you said it was a proposal. Was it enacted?

11 A I think they tended to, yeah.

12 Q Okay. And did they -- Who was the other member of
13 Commissioner Fain's dyad?

14 A It involved all four of them, so they would take
15 turns amongst the four. So a dyad with Graves --
16 Walkinshaw, a dyad with --

17 (Court reporter request to keep voice volume up.)

18 A A dyad with Walkinshaw, Commissioner Walkinshaw, and
19 a dyad with Commissioner Sims, and obviously there was a
20 dyad with Commissioner Graves.

21 Q Okay. So your understanding was that the dyads
22 basically would reconstitute as needed throughout the
23 process?

24 A Yeah. I think they tried to formalize it some.

25 Q Okay. The last week of the redistricting process,

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1 were you working a lot that week?

2 A Yeah.

3 MS. LEEPER: Object to form.

4 A Yes, I believe I was.

5 MR. HUGHES: Could I just ask what the form
6 objection is?

7 MS. LEEPER: I would love it if you could
8 describe "a lot."

9 MR. HUGHES: Okay.

10 Q (By Mr. Hughes) Were you working more than usual
11 that week?

12 A My wife would say no, but I would say yes.

13 Q Well, she can talk to the AUSA if need be about you
14 perjuring yourself.

15 What -- How often -- How much were you working would
16 you say that last week?

17 MR. HUGHES: That was a joke, just to be
18 clear.

19 A I probably -- I couldn't put a number on it.

20 Q And how would you describe the atmosphere around
21 your work on the redistricting during that last week?

22 A How would I describe the atmosphere?

23 Q Yeah.

24 A Good? Intense? I don't know.

25 Q Good, intense. So I've heard you use the word

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1 chaotic to describe November 15th; is that right?

2 A Yes.

3 Q Was November 15th the only day of that week that
4 fairly could be described as chaotic?

5 A Well, it was on a level that we hadn't seen to that
6 point. So yeah, it was -- It was a long and tense week, I
7 suppose.

8 Q Were you sleeping very much that week?

9 A Probably not.

10 Q How much is probably not? What would you -- Strike
11 that.

12 How much would you guess you were sleeping that
13 week?

14 A Four or five hours a day, I guess.

15 Q Is that less than normal for you?

16 A Yeah.

17 Q Okay. I'd like to move on to Exhibit 10 if we
18 could, and I'd like to go to the very first email in the
19 thread. I believe it's from you to Joe Fain dated
20 November 4th.

21 Do you see that?

22 A Not yet.

23 Q My apologies.

24 MS. GOLDMAN: The last page.

25 THE WITNESS: The last page?

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1 A Yes.

2 Q (By Mr. Hughes) And is this an email that you sent
3 to Mr. Fain?

4 A Yes, November 4th.

5 Q And Ms. Leeper already asked you about this, but I
6 want to go over a sentence you used -- or yeah, a sentence
7 you use in here, "I renamed their 14th to 15th because
8 Honeyford is in it, and King was not."

9 And I believe Ms. Leeper already asked you what you
10 meant by that, but just to give us some context can you
11 remind me what that meant to you?

12 A We received their draft. It had the numbers
13 switched, so I switched them back.

14 Q What do you mean it had the numbers switched?

15 A Well, the 15th was where the 14th would normally be,
16 and the "15th" was where the "14th" would normally be, if
17 that works.

18 Q Was it your understanding at the time that that was
19 unintentional by the Democratic commissioners?

20 A That's what I thought.

21 Q Okay. Was there any discussion when you made this
22 decision to switch them back about how this would affect
23 turnouts in the elections?

24 A Not at this point.

25 Q Okay. And so there was no discussion with

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1 Republican commissioners or staff about how this would
2 affect turnout, as far as you recall?

3 A Not that I remember.

4 Q Do you recall anyone ever discussing this issue of
5 how numbering the district would affect turnout?

6 A Once they -- I think at some point they told us
7 that's what they were trying to do, they being the
8 Democratic commissioners. That's why they were switching
9 the numbers, --

10 Q Okay.

11 A -- but they never said that up front.

12 Q And you said at some point. Do you recall about
13 when that was?

14 A No.

15 Q Okay. And then once you heard that how did that
16 impact how you were thinking about the numbering of the
17 districts?

18 A Well, then I realized they were trying to make it a
19 race that would be run on the presidential year.

20 Q Okay. So did that give you any pause about whether
21 they should be switched back?

22 A Did it give me any pause? I suppose, but my concern
23 was the members, so --

24 Q And at that point when you learned why the
25 Democratic commissioners, why their maps had numbered the

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1 districts this way, at that point did you have any
2 conversations with any Republican commissioners about what
3 it would mean for turnout?

4 A I'm guessing I did, yes.

5 Q And you say you're guessing. Do you recall any
6 conversation?

7 A Not specifically, no.

8 Q Okay. Do you recall any sort of general feelings or
9 ideas that were shared at that time?

10 A No, not -- I mean, in general it would increase
11 voter turnout --

12 Q Okay.

13 A -- for one district and reduce it for the other.

14 Q Okay. So you recall there being a discussion about
15 how this would affect turnout.

16 Do you recall how that was resolved at all?

17 A No.

18 Q Were you aware -- We've been talking about turnout.

19 Were you aware of any concerns that switching the
20 district numbering here would have on Latino turnout in
21 particular?

22 A Not that I can remember. At what point?

23 Q You told me that the Democratic commissioners -- or
24 someone communicated to you from the Democratic side that
25 the districts were numbered this way because it had to do

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1 with turnout.

2 So at that point when according to you you
3 understood why the numbering was this way, did you have
4 any conversation with anyone about how this might affect
5 the Latino turnout specifically?

6 A No, not that I recall.

7 Q Okay. As far as you're aware did Commissioner
8 Graves or Commissioner Fain or any Republican caucus ever
9 obtain an analysis of racially polarized voting in the
10 Yakima Valley?

11 A I don't know what they obtained. Sorry.

12 Q Okay.

13 A No.

14 Q So if they did, they didn't tell you about it?

15 A If they did I don't remember it, if they did tell
16 me, but I don't remember it.

17 Q Okay. Do you recall if Commissioner Graves or Fain
18 or anyone from the Republican caucus ever got an analysis
19 of Latino performance, electoral performance in the Yakima
20 Valley?

21 A I -- I don't recall specifically. I think
22 Commissioner Graves may have asked about that. I don't
23 remember.

24 Q What do you remember about Commissioner Graves
25 asking about that?

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1 A Well, just that. I mean, if there was -- I think it
2 was Graves. Yeah, I don't remember. I'm sorry.

3 Q Okay. No worries. No worries.

4 Do you recall -- To the extent you remember this, do
5 you recall when it might have happened? Or when it did
6 happen, I should say.

7 A No, I don't remember.

8 Q Okay. And I believe there was some discussion
9 earlier of Dr. Matt Barreto's report. It was initially to
10 the Democratic caucus, and then it was shared with the
11 entire commission.

12 Do you recall that?

13 A Yes.

14 Q And I should clarify, or I should get on the record
15 the way I just described it, that it was obtained by the
16 Senate Democratic caucus and then was shared with the rest
17 of the commission, is that your understanding of where
18 this report comes from?

19 A No. Well, my understanding is that it was a study
20 he did, and he publicized it. I didn't know that the
21 Democratic caucus funded it.

22 Q Let me ask you this. Do you -- You might have
23 misunderstood my question, but do you know who
24 commissioned that report from Dr. Barreto?

25 A I believe it was the Democratic caucus.

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1 Q Okay. But that as far as you know, it was shared
2 with the entire commission?

3 A Yes.

4 Q Okay.

5 A As far as I know.

6 Q As far as you know.

7 As far as you know was that the only statistical or
8 demographic analysis that was reviewed by the whole
9 commission with respect to this issue of Latino voting in
10 the Yakima Valley?

11 MS. LEEPER: Objection, calls for
12 speculation.

13 A As far as I know.

14 Q (By Mr. Hughes) As far as you know? Okay.

15 So you're not aware of any other -- Strike that.

16 Are you aware of any other statistic or demographic
17 analysis that anyone else was looking at or had
18 commissioned?

19 A Not that I remember.

20 Q Okay. In your own words what do you recall were the
21 conclusions of Dr. Barreto's report?

22 A I didn't -- Well, from what I remember, let's see,
23 that it was there was racial polarizing -- polarized
24 voting in some elections in the area, and therefore there
25 would be the same in district races.

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1 Q Do you recall whether you agreed or disagreed with
2 those conclusions?

3 A Do I recall whether I agreed or disagreed? I --
4 Yeah, I don't remember that I -- I probably disagreed with
5 it.

6 Q Why do you say that?

7 A Because the candidates I prefer in that area tend to
8 win, so --

9 MS. LEEPER: I'm sorry, Mr. Campos, could
10 you speak up?

11 THE WITNESS: Yes.

12 MS. LEEPER: Thank you.

13 Q (By Mr. Hughes) Did you have any discussion -- I
14 apologize again if I already asked this, but did you have
15 any discussion with any commissioners about that Barreto
16 report?

17 A Not -- That it existed and they were looking at it,
18 and it was out there, and that's pretty much it.

19 Q You said they were looking at it. What did that
20 mean?

21 A It was presented to the commissioners and passed
22 around, I guess.

23 Q Okay. Are you aware of whether any efforts were
24 made by anyone you worked for or with to investigate or
25 corroborate the conclusions in Dr. Barreto's report?

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1 A Not that I know of, no.

2 Q Okay. So what then was your basis for believing
3 that Dr. Barreto's conclusions were not supported?

4 A Being an Hispanic and knowing that my preferred
5 candidates tend to win, I wouldn't support his
6 conclusions.

7 Q Is there anything else?

8 A No.

9 Q Okay. Was Dr. Barreto's presentation, seeing that
10 presentation, the first time you recall the issue of a VRA
11 district in the Yakima area arising?

12 A No, I don't think so.

13 Q When do you recall that issue first arising for you?

14 A Probably we had some discussions of it in the 2001
15 redistricting cycle. And then again, I know they talked
16 about it kind of in the presentation forum again in 2001.

17 Q So as far as --

18 A I mean 2011. Sorry.

19 Q My apologies.

20 MR. HUGHES: Sorry. Could I just get the
21 end of that answer read back?

22 THE REPORTER: Sure.

23 (Answer read back.)

24 THE WITNESS: I meant 2011.

25 THE REPORTER: And then you said, "2011."

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1 Sorry." That was the next answer.

2 Q (By Mr. Hughes) So as far back as 2001 then there
3 was some understanding that a majority Hispanic district
4 might be necessary in the Yakima Valley?

5 A Not in the Valley specifically, just in general. I
6 mean, majority -- majority minority districts were a topic
7 of discussion in any redistricting effort.

8 Q Okay. So I'm asking specifically, though, about --

9 A Oh.

10 Q -- this issue arising in conjunction with the Yakima
11 area.

12 A Okay. So probably in 2011 I think they talked about
13 it. I wasn't involved too much. And then this time.

14 Q Okay. What do you remember about it being discussed
15 in 2011?

16 A I think they had the same presentation that this
17 commission received from the Attorney General about
18 federal VRA requirements.

19 Q Do you know how that was ultimately resolved in
20 2011?

21 A No.

22 Q So with that background was this something that was
23 on your mind coming into the 2021 redistricting cycle?

24 A This being the federal VRA?

25 Q This meaning the possibility that you would be

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1 required to create a majority Hispanic district in the
2 Yakima area.

3 A Yeah.

4 Q And was this something that was on other folks'
5 minds, as far as you know?

6 A I don't know what was on the other folks' minds.

7 Q Did you discuss this with anyone?

8 A Generally, yeah, probably.

9 Q Okay. And who did you discuss it with?

10 A Well, probably James and Anton, Fain.

11 Q And I guess I just want to be clear on the timeframe
12 here. I'm talking about at the beginning of the process.

13 So let's say prior to the September, 2021 maps --

14 A Um-hmm.

15 Q -- do you recall there being discussions about the
16 possibility that you might have to create a majority
17 minority district in Washington in the Yakima area?

18 A Yeah, I'm sure we discussed it.

19 Q Okay. And you mentioned that was based on a
20 presentation you'd seen in 2011. Was there anything else
21 that was supporting or that you base that view on?

22 A Well, simply beyond that we have -- The National
23 Conference of State Legislators has a redistricting work
24 group --

25 Q Okay.

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1 A -- and section, of which I would listen into their
2 conversations about redistricting across the nation. That
3 was always a big topic.

4 Q And did that discuss -- Strike that.

5 When you had these conversations, these calls that
6 you would listen into, was there any discussion of the
7 Yakima area in general or specifically?

8 A Oh, no.

9 Q Okay. So it was the VRA generally then?

10 A Yes.

11 Q Okay. So was there anything else that led you to
12 believe that there was a possibility that you would have
13 to create a majority minority district in the Yakima area,
14 other than a presentation you remember from 2011?

15 A Not that I remember, no.

16 Q Okay. Were you aware of a VRA case brought against
17 the City of Yakima in 2012?

18 A I was aware of it.

19 Q Do you recall when you became aware of that?

20 A When it came in the newspapers. It showed up in the
21 newspapers.

22 Q Was that something that you were considering and
23 thinking about, whether you might have to draw a majority
24 minority district in the Yakima area?

25 A Not really, no.

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1 Q Do you recall a similar lawsuit in the City of Pasco
2 in 2016?

3 A I know -- Yeah.

4 Q And was that something that you took into
5 consideration when you were thinking about drawing maps in
6 the Yakima area?

7 A Not really, no.

8 Q Okay. Is it your understanding -- and I'm not
9 asking about any conversations you've had with any
10 attorney who represents you.

11 Is it your understanding that the legislative map
12 enacted by the legislature complies with the Voting Rights
13 Act?

14 A Yes.

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

17 Q (By Mr. Hughes) And what is the basis for your
18 belief there?

19 MS. GOLDMAN: And though it's embedded in
20 the question, I'm going to instruct you regarding the
21 attorney-client privilege. So to the degree your view
22 that you just stated that it's compliant is based on the
23 advice of counsel, request for legal advice in answer to
24 that request or discussion about it, I'm instructing you
25 not to answer.

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1 If your opinion is based on anything other than such
2 an attorney-client privileged communication, you may
3 answer.

4 A And the question was?

5 Q (By Mr. Hughes) Sure. On what do you base your
6 expressed opinion that the maps enacted by the legislature
7 comply with the Voting Rights Act?

8 MS. GOLDMAN: Same objections and
9 instruction.

10 MS. LEEPER: I'm going to object as to
11 form.

12 A What do I base it on? Just a feeling that it's
13 good.

14 Q (By Mr. Hughes) You mentioned that -- So this view
15 that the enacted map complies with the Voting Rights Act,
16 have you discussed that view with Commissioner Fain?

17 A No, not that I remember.

18 Q Do you understand from any communications you've
19 seen or any communications you had with Commissioner Fain
20 whether he shares that belief?

21 A No, I wouldn't know that.

22 Q Okay. Okay. Are you aware that at least two
23 commissioners believed it was necessary to create a
24 majority Hispanic CVAP district in order to comply with
25 the VRA?

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1 A Yes.

2 Q And which commissioners were you aware of sharing
3 this view?

4 A Sims and Walkinshaw.

5 Q Anyone else?

6 A I mean, maybe the other two did as well, but I
7 wouldn't -- They never said that.

8 Q Okay. What was your understanding of the basis for
9 this view expressed by Sims and Mister -- Commissioner
10 Piñero Walkinshaw?

11 A I think they both said that in a public hearing.

12 Q Okay. And did they say why they believed that was
13 the case?

14 A No.

15 MS. LEEPER: Objection, calls for
16 speculation.

17 Q (By Mr. Hughes) So you don't have any understanding
18 of why Commissioners Sims and Piñero Walkinshaw believed
19 it was necessary to create a majority Hispanic CVAP
20 district in the Yakima area?

21 A I don't remember.

22 MR. HUGHES: Okay. I think that is all the
23 questions I have. Yes, that is all the questions I have.

24 Thank you very much, Mr. Campos.

25 MS. LEEPER: We don't have redirect, so I

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1 think we're good to go off the record.

2 Thank you so much for your time today, Mr. Campos.

3 THE WITNESS: You're welcome.

4 (Discussion off the record.)

5 (Deposition concluded at 4:40 p.m.)

6 (Signature reserved.)

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1 C E R T I F I C A T E

2 STATE OF WASHINGTON)
) SS
 3 County of King)

4 I, the undersigned Washington Certified Court
 Reporter, pursuant to RCW 5.28.010 authorized to
 5 administer oaths and affirmations in and for the State of
 Washington, do hereby certify:

6 That the annexed and foregoing deposition of the
 witness named herein was taken stenographically before me
 7 and reduced to typewritten form under my direction.

I further certify that the witness examined will be
 8 given an opportunity to review and sign their deposition
 after the same is transcribed, unless indicated in the
 9 record that the parties and witness waived the signing.

I further certify that all objections made at the
 10 time of said examination to my qualifications or the
 manner of taking the deposition or to the conduct of any
 11 party have been noted by me upon the deposition.

I further certify that I am not a relative or an
 12 employee or attorney or counsel of any of the parties to
 said action, or a relative or employee of any such
 13 attorney or counsel, and that I am not financially
 interested in the said action or the outcome thereof.

I further certify that the witness before examination
 14 was by me duly sworn to testify the truth, the whole
 15 truth, and nothing but the truth.

I further certify that the deposition, as
 16 transcribed, is a full, true and correct transcript of the
 testimony, including questions and answers and all
 17 objections, motions and exceptions of counsel made and
 taken at the time of the foregoing examination and was
 18 prepared pursuant to Washington Administrative Code
 308-14-135, the transcript preparation format guideline.

19 IN WITNESS WHEREOF, I have hereunto set my hand this
 20 24th day of August, 2022.

21 

22 Jeanne M. Gersten, RDR, CCR
 Registered Diplomat Reporter
 23 Washington CCR No. 2711
 License effective until April 2, 2023
 24 Residing at Seattle, Washington
 25



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1 CHANGE/SIGNATURE SHEET

2 I, the undersigned, PAUL CAMPOS, hereby certify
 3 that I have read the foregoing deposition and that, to the
 4 best of my knowledge, said deposition is true and
 accurate, with the exception of the following corrections
 listed below:

5	PAGE	LINE	CHANGE	REASON
6				
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15				
16				
17				

18 _____
 Signature Date

19
 20 Witness: Paul Campos
 Soto Palmer, et al. v. Hobbs, et al.
 21 USDC Western District of Washington at Seattle
 Cause No. 3:22-cv-05035-RSL
 22 Date: August 15, 2022

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