

EXHIBIT 4

Soto Palmer, et al.

v.

Hobbs, et al.

* * * * *

Deposition Upon Oral Examination of
Adam Hall
December 19, 2022

* * * * *

REPORTED BY:

LAKESIDE REPORTING

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Adam Hall

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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

ADAM HALL

Monday, December 19, 2022

8:59 a.m. to 4:32 p.m.

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17 * * * * *

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1 December 19, 2022, Seattle, Washington:

2 PROCEEDINGS: 8:59 a.m.

3 (Discussion off the record.)

4 ADAM HALL,

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

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

9 BY MR. MULJI:

10 Q Okay. Good morning. We've met before, but my name
11 is Aseem Mulji, and I represent the plaintiffs in the
12 Soto Palmer v. Hobbs case; and I'm going to be asking you
13 some questions today in this deposition.

14 MR. MULJI: Before I start I just want to
15 identify everyone who is here for the record. So I have
16 myself and Ben Phillips from Campaign Legal Center for the
17 plaintiffs. Also on the line for the plaintiffs are
18 Simone Leeper and Kate Hamilton. And then we have Andrew
19 Hughes from the State of Washington. You have your
20 attorney, Ms. Goldman. And we have Brennan Bowen on
21 behalf of the intervenors. I think I got everyone, yes.

22 Q (By Mr. Mulji) Okay. Can you state your full name
23 for the record?

24 A Adam James Hall.

25 Q And do you go by Adam?

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1 A Yes.

2 Q Can I call you Adam today?

3 A Yes.

4 Q Okay. I'm going to just start by going over some
5 ground rules for today's deposition. And actually before
6 I do, have you ever been deposed before?

7 A No.

8 Q Okay. So this is a deposition. I'm going to just
9 be asking you questions. It's informal, but you are under
10 oath. Everything you say, everything everyone says is
11 being recorded by Jeanne; and in order to have sort of a
12 clear record I'm going to try my best not to talk over
13 you, and I just ask that you also do the same. Wait for
14 me to finish asking my question, and then give your
15 answer; and I'll wait for you to finish.

16 Does that all make sense?

17 A Yes.

18 Q And you've done this twice already, but please
19 provide verbal responses. So nodding your head, shaking
20 your head, um-hmm, uh-uh, none of those things are going
21 to show up clearly on the record. So just be sure to give
22 a verbal response.

23 Do you understand that?

24 A Yes.

25 Q If you don't understand a question that I ask,

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1 please ask me for clarification. Let me know you don't
2 understand. If you answer the question, I will assume
3 that you understood it.

4 Does that make sense?

5 A Yes.

6 Q It may happen that you answer a question and then a
7 few minutes later or even an hour later remember that you
8 didn't answer completely or want to clarify a response.
9 If that happens just let me know right then, and we will
10 go ahead and clarify your response to the prior question.

11 Does that make sense?

12 A Yes.

13 Q One of the attorneys here may object to my
14 questions -- maybe. That objection is just stated for the
15 record, and you're still required to answer the question
16 unless you're specifically instructed not to.

17 Do you understand that?

18 A Yes.

19 Q We can take breaks, and I will aim to try to get a
20 break in every hour for Jeanne; but we can break when
21 you'd like. I'd just ask that you don't take a break when
22 a question is still pending. So answer the question, and
23 then you can take a break.

24 Does that sound good?

25 A Yes.

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1 Q I mentioned this earlier, the court reporter has put
2 you under oath, which means that you're under an
3 obligation to tell the truth.

4 Do you understand that?

5 A Yes.

6 Q Is there any reason you can't give truthful answers
7 to my questions today?

8 A No.

9 Q Do you have any conditions that impair your memory?

10 A No.

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

13 A No.

14 Q What did you do to prepare for this deposition?

15 A I spoke with my attorney.

16 Q Okay. And how many --

17 And your attorney is Ms. Goldman?

18 A Yes.

19 Q Okay. Any other attorneys that you spoke with?

20 A No.

21 Q Did you meet with any counsel for the state to
22 prepare for this deposition? And by that I mean the
23 counsel of record in this case for the Attorney General's
24 Office.

25 A Can you restate the question?

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1 Q Did you meet with any of the counsel of record in
2 this case for the Attorney General's Office to prepare for
3 this deposition?

4 A No.

5 Q You said you met with Ms. Goldman. How many times
6 did you meet with her?

7 A Twice.

8 Q And the first time, when was it?

9 A It would have been shortly after I got the notice of
10 deposition.

11 Q And approximately how long was that meeting?

12 A It was an hour and -- Let me go back. I've had
13 three conversations.

14 Q Okay. So the first one was shortly after you got
15 the notice for the deposition?

16 A That was an hour and a half on the phone.

17 Q Okay. And what about the second time, when was
18 that?

19 A I came into this office, but we had a phone
20 conversation. That would have been a week and a half ago.

21 Q Okay. And then you met one more time?

22 A Yes.

23 Q And how long did you meet?

24 A We met for about an hour and a half a week ago.

25 Q Okay. Besides your attorney did you discuss this

1 deposition with anyone else?

2 A I spoke to people to tell them that I had the
3 deposition.

4 Q And when you say people, who?

5 A Spouse.

6 Q Okay.

7 A Supervisors.

8 Q That was purely to inform people that you were going
9 to be in a deposition?

10 A Yes.

11 Q Did you discuss the content of this deposition or
12 what was the expected content of this deposition with
13 anyone?

14 A No.

15 Q Okay. Did you review any documents in preparation
16 for this deposition? And I ask you this separate from any
17 documents you reviewed with your attorney during any of
18 those meetings, but did you -- At any other time did you
19 review any documents?

20 A No.

21 Q About how long do you think you've spent in total
22 preparing for this deposition?

23 A Less than five hours.

24 Q So the trial in this case is currently scheduled to
25 start on May 1st, 2023. As of now do you see or foresee

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1 any reason why you would be unavailable during the week of
2 May 1st?

3 A No.

4 Q Do you foresee any reason you might be unavailable
5 the following week? I think that's May 7th.

6 A No.

7 Q You understand that you're being deposed in the
8 Soto Palmer case?

9 A Yes.

10 Q Are you familiar with a different lawsuit filed
11 against the enacted version of Legislative District 15 as
12 Garcia v. Hobbs?

13 A Yes.

14 Q What's your understanding of what the Garcia case is
15 about?

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

18 Q (By Mr. Mulji) You can answer.

19 A I followed the initial hearings prior to a decision
20 on the injunction before the 2022 elections, so I had an
21 opportunity to listen to the arguments made. And I
22 understand the case to be about whether the enacted map
23 violates the Federal Constitution because of how it was
24 drawn.

25 Q Okay. I'm going to be using the terms Latino and

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1 Hispanic interchangeably during this deposition.

2 Do you understand that?

3 A Yes.

4 Q And I'm going to be referring to Hispanic or Latino
5 to mean anybody of any race who identifies as Hispanic or
6 Latino.

7 Do you understand that?

8 A Yes.

9 Q And when I say White in reference to someone, I'm
10 talking about someone who identifies as White but not
11 Hispanic or Latino.

12 Does that make sense?

13 A Yes.

14 Q Do you identify as Hispanic or Latino?

15 A No.

16 Q How do you identify racially?

17 A White.

18 Q And are you an attorney?

19 A Yes.

20 Q Where did you go to law school?

21 A Catholic University in Washington, D.C.

22 Q And did you have a particular focus in law school?

23 A I spent most of my time focused on constitutional
24 law and legislation.

25 Q And to the extent, I guess, anybody has a focus in

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1 law school, did you --

2 A It was informal.

3 Q Okay. Did you take any coursework in voting rights?

4 A Yes.

5 Q Did you take coursework related too redistricting?

6 A I believe redistricting was covered in my election
7 law course.

8 Q Okay. So you took election law, and that covered
9 voting rights and redistricting?

10 A (Nodded.)

11 (Court reporter request to answer verbally.)

12 A Yes, that's correct.

13 Q I'm sorry. And that also wasn't a clear question,
14 so I apologize.

15 After law school what kind of legal work did you do?

16 A I conducted vetting for a national political
17 campaign and the presidential transition team. This team
18 was comprised of lawyers. It did not require any legal
19 research or writing.

20 Q When -- Sorry, go ahead.

21 A That's all.

22 Q When did you graduate from law school?

23 A 2008.

24 Q Okay. And so you worked on the presidential
25 transition in 2008 or 2009, I guess?

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1 A (Nodded.)

2 (Court reporter request to answer verbally.)

3 A Yes.

4 Q And can you just sort of walk me through the course
5 of your career after that as a lawyer?

6 A Sure. After working on the national political
7 campaign and the presidential transition I spent time
8 working for a member of Congress as a Legislative Fellow.
9 After that I spent time at the U.S. State Department in
10 their human trafficking office. Both of those were
11 policy-based positions. I was not acting as a lawyer in
12 either of those roles.

13 Subsequent to that I spent a little over a year with
14 the Council of State Governments Justice Center where I
15 worked on criminal justice policy. And I was hired in my
16 current position in November of 2013.

17 Q And your current position, what is that?

18 A I'm Senior Policy Counsel for the Washington State
19 Senate Democratic Caucus.

20 Q And you've held that position since 2013?

21 A Yes.

22 Q And in that position you mentioned that in some of
23 your previous positions you had worked in sort of a policy
24 capacity as an attorney, not as a sort of litigation or
25 compliance attorney.

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1 A (Nodded.)

2 Q Is that -- What is the nature of the work that you
3 do, legal work that you do in your current position?

4 A I staff policy areas that have a significant legal
5 component. So I staff all matters related to voting
6 rights, to criminal law, to civil law, to issues that are
7 heavily litigated in the courts, like firearms. And so my
8 responsibility is to understand existing case law and
9 lawsuits that are pending before state and federal courts
10 and to be able to provide briefings and analysis to
11 legislators.

12 Q When you provide briefings and analysis to
13 legislators are you providing that in sort of a policy
14 capacity, or are you -- You're not retained counsel,
15 right, when providing this advice?

16 MS. GOLDMAN: Objection, compound.

17 A Can you restate the question?

18 Q (By Mr. Mulji) When you're providing policy advice
19 or policy guidance to members of -- the legislator or
20 staff of the legislator, you're providing that advice or
21 guidance in the capacity as sort of a policy attorney;
22 correct?

23 A Yes.

24 MR. HUGHES: Object to form.

25 Q (By Mr. Mulji) And you mentioned that it's your job

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1 to sort of understand the law and the implications of the
2 law on different policy areas; is that right?

3 A Yes.

4 Q And one of those policy areas was the 2021
5 redistricting process; is that right?

6 A Yes.

7 Q What is your job title?

8 A I'm Senior Policy Counsel.

9 Q Okay. At any point in time did your title include
10 redistricting as an explicit role?

11 A Yes.

12 Q At what points in time did you hold that position?

13 A From roughly January of 2021 through December of
14 2021.

15 Q And what was your title during that period?

16 A I believe it was listed on my signature line as
17 Senior Policy and Redistricting Counsel.

18 Q And was January of 2021 when you first got involved
19 in the redistricting process?

20 A No. I had held an informal role in the 2021
21 redistricting cycle for several months prior to the
22 beginning of 2021.

23 Q Prior to January of 2021 what did your work on
24 redistricting entail?

25 A Because there was no Commission, because there was

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1 no commissioners, no Commission staff at that point, but
2 there was a desire to start making decisions around how
3 the Commission would function and operate, I would meet
4 with representatives of the other three partisan caucuses
5 as well as Senate and House administration.

6 Q In those several months leading up to January, 2021,
7 other than working on sort of how the Commission would
8 operate, how else did you spend your time on redistricting
9 work?

10 A Research, conversations around strategy.

11 Q Was your research related to sort of how the
12 Commission -- I think you said how the Commission would
13 operate or function; correct?

14 MS. GOLDMAN: Objection, vague.

15 A Can you restate the question?

16 Q (By Mr. Mulji) Your work before 2021 involved
17 looking into how the Commission would operate or function;
18 is that right?

19 A Yes, along with other things, like the strategicals
20 of the redistricting process for the caucus.

21 Q And on that first point on how the Commission would
22 operate, what did your work entail related to the
23 Commission's operations?

24 A It would focus on things like did we need office
25 space. What software would we hire. What the timelines

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1 were for the respective caucuses in terms of appointing a
2 commissioner.

3 Q You mentioned that you did this work in conjunction
4 with staffers of other legislative caucuses; is that
5 right?

6 A Yes.

7 Q Who were the main sort of caucus staff that you
8 worked with on this?

9 A The other caucus representatives would have been
10 Paul Campos, Amy Ruble.

11 THE REPORTER: Can you spell her last name,
12 please?

13 THE WITNESS: R-U-B-L-E.

14 THE REPORTER: Thank you.

15 A And the staff person from the House Republican
16 Caucus has since departed, and I unfortunately don't
17 remember his name. I believe it was a Matthew.

18 Q That was for the House Republican Caucus?

19 A Yes. He left the caucus shortly before the
20 commissioners were appointed.

21 Q Okay. And Amy Ruble, which caucus --

22 A House Democratic Caucus.

23 Q And Paul Campos?

24 A Senate Republican Caucus.

25 Q Okay. During that time did you discuss with other

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1 caucus staff what sort of the expected timeline was of the
2 redistricting process overall?

3 A Yes.

4 Q What were those -- What were those discussions?
5 What did you discuss about the timeline of the
6 redistricting process with those folks?

7 A Appointment of commissioners and when those
8 announcements might be made.

9 Q And when did you expect the appointments would be
10 done?

11 A The State Constitution requires them to be appointed
12 during the first part of the calendar year. So the
13 conversations that I had were focused on the caucuses that
14 were, I think, less -- that were not working as quickly in
15 terms of naming their appointees.

16 Q Did you discuss what the timeline for the
17 redistricting process might look like beyond appointment?

18 A I don't remember.

19 Q During that time were you -- What kinds of materials
20 were you looking at to prepare for the start of the
21 redistricting process?

22 A We were given presentation materials from different
23 software vendors. So we would review materials that were
24 provided by those vendors or by House and Senate
25 administration who were serving as the point of entry for

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1 those potential vendors.

2 Q Vendors related to -- Software vendors related to
3 what?

4 A The mapping programs that would be used by the
5 Commission.

6 Q What was the mapping program that the Commission
7 ultimately settled on?

8 A I never used it. I don't remember.

9 Q Okay. You mentioned that during this time -- Well,
10 actually before I go there.

11 Did you review materials related to the operation of
12 the 2011 Redistricting Commission?

13 A Yes.

14 Q What materials did you review related to that?

15 A There was a binder in my office that was a
16 summation of redistricting communications that I reviewed
17 before we moved fully remote in March of 2020.

18 Q Can you say more about what was in this binder?

19 A The surveys of legislators, email communications,
20 recommendations regarding the commissioner position for
21 the Senate Democratic Caucus.

22 Q And to be clear, these are materials related to the
23 2011 Redistricting Commission?

24 A Yes.

25 Q And is it fair to say this was a binder sort of

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1 passed on --

2 A Yes.

3 Q -- to memorialize what happened in the 2011
4 Commission?

5 A Yes.

6 Q Okay. And do you still have this binder?

7 A Yes.

8 MR. MULJI: We would -- I mean, I'll put
9 the request here on the record now, but we would probably
10 want to request that binder; and I believe it likely will
11 fall under our existing subpoena that we issued. We can
12 also discuss that off the record, but I just wanted to
13 note that here that it may fall under the obligations to
14 produce under what we've asked for.

15 Q (By Mr. Mulji) What did you learn about the 2011
16 Commission from the research that you did about how that
17 Commission operated?

18 A I didn't find anything in the binder that was
19 particularly instructive, so I received most of -- the
20 most valuable information from Adam Bartz, who had been
21 commission staff for the House Democratic Caucus, and is
22 currently the Executive Director of the Senate Democratic
23 Campaign Committee.

24 Q And did Adam Bartz work on the 2011 redistricting
25 process?

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1 A Yes. He staffed the House Democratic Caucus
2 commissioner at the time.

3 Q I see. And what did you learn in your conversations
4 with him about the 2011 Redistricting Commission?

5 A A lot of things. I talked to him about what the
6 process was like, how the negotiations went.
7 Conversations about Voting Rights Act and its
8 applicability.

9 We spoke about how negotiations unfolded in the
10 months and weeks and days prior to the deadline. We spoke
11 about outreach efforts, and we spoke about relationship
12 building with members of the Senate Democratic Caucus as
13 well as the congressional delegation.

14 Q I want to dig into this a little bit. So based on
15 those conversations and your review of materials from that
16 process, were there particular ways that the 2011's
17 Commission process differed from your experience of the
18 2021 --

19 MS. GOLDMAN: Objection, calls --

20 Q -- process?

21 MS. GOLDMAN: Objection, calls for
22 speculation.

23 MR. HUGHES: And vague.

24 Q (By Mr. Mulji) You can answer.

25 A Can you restate the question?

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1 Q Yes. Based on your readings about how the 2011
2 Commission operated and your conversations with staffers
3 from that Commission, were there ways that the 2021
4 redistricting process differed from the prior
5 redistricting process?

6 A Yes.

7 MS. GOLDMAN: Objection, calls for
8 speculation.

9 Q (By Mr. Mulji) And in what ways did it differ?

10 A A lot. Can you be more specific?

11 Q Sure. Well, let's start with the timeline.
12 Did the Commissions operate on a similar timeline?

13 MS. GOLDMAN: Objection, call for
14 speculation.

15 Q (By Mr. Mulji) You can answer.

16 A They had the same requirements. They had the same
17 deadlines. I would not say that they performed the duties
18 along the same timeline.

19 Q In what ways did the 2021 Commission depart from
20 maybe the timeline that the 2011 Commission used?

21 A They're --

22 MS. GOLDMAN: Objection, calls for
23 speculation.

24 MR. HUGHES: And lack of foundation.

25 Can I -- Sorry, Aseem. Can I get a standing

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1 objection on foundation for these sort of questions, any
2 questions where Adam's knowledge would come solely from
3 Adam Bartz?

4 MR. MULJI: Yes, you're welcome to put that
5 objection on the record.

6 MR. HUGHES: I'm asking -- I could object
7 individually to every question, --

8 MR. MULJI: I see.

9 MR. HUGHES: -- but if you just give me a
10 standing objection I could not interrupt the flow.

11 MR. MULJI: Sure.

12 MR. HUGHES: Thank you, Aseem.

13 MR. BOWEN: And also -- and I might have
14 missed this -- do we have on the record that an objection
15 by one preserves it for all? I know we talked about it
16 beforehand.

17 THE REPORTER: It was not on the record.

18 MR. BOWEN: Okay. Could we get that on the
19 record now?

20 MR. MULJI: That's fine with plaintiffs.

21 MR. HUGHES: Yes, agreed. Thanks, Brennan.

22 MR. BOWEN: All right. Thanks.

23 A I was told that the final map in 2011 was approved
24 several hours before the constitutional deadline. There
25 was no map at midnight, at the midnight deadline during

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1 the 2021 redistricting cycle.

2 Q (By Mr. Mulji) And were there other ways that you
3 learned the timeline differed from 2011 to 2021?

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

6 A Yes. Given the delay in census data being received
7 by the state, there were fewer caucus proposals than there
8 were in the previous cycle. In the previous cycle there
9 were maps produced by -- There was a round of maps
10 produced by each caucus, a round of maps produced by each
11 sort of party, meaning the House Democratic, Senate
12 Democratic commissioners' proposed map; and then the
13 Republican-appointed commissioners from the House and
14 Senate caucuses also produced a map, and then there was a
15 final map.

16 In this situation there was a single map produced by
17 all four caucuses in the middle of September, followed by
18 voluntary maps being produced by the House and Senate
19 Democratic Caucuses. Excuse me, the appointed
20 commissioners from the House and Senate Democratic
21 Caucuses in October, and then the final map, which was
22 adopted, which was created after the deadline.

23 Q (By Mr. Mulji) And so just to make sure I
24 understand. The 2021 process there were -- You said that
25 there were four public proposals put out by each caucus in

1 September, followed by two more proposals by the
2 Democratic caucuses in October; is that right?

3 A They were put out by the -- I should be more careful
4 with my words. They were released by the commissioners
5 appointed by the House and Senate Democratic Caucuses.

6 Q Right. And how was that different in the 2011
7 process? I didn't quite understand.

8 MS. GOLDMAN: Objection, asked and
9 answered, and calls for speculation.

10 Q (By Mr. Mulji) You can answer.

11 A In 2011 there was a round where each caucus released
12 a map, and then a second round where each partisan
13 grouping released a map.

14 So the Republicans released a joint map, and the
15 Democrats released a joint map.

16 Q I see. So in 2011 each of the four commissioners
17 released a public proposal; and then there was a second
18 round of public proposals where the Democratic
19 commissioners proposed a single map, and then the
20 Republican commissioners proposed a single map; is that
21 right?

22 A (Nodded.) Yes. And I know I'm nodding my head.
23 I'm sorry.

24 Q When was the second proposal, public proposal
25 released in 2011?

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

3 A I don't know offhand.

4 Q (By Mr. Mulji) Sometime before the deadline for the
5 Commission; correct?

6 A Yes.

7 Q How did that impact the negotiations during the 2011
8 process, as far as you know?

9 MS. GOLDMAN: Objection, lack of
10 foundation, calls for speculation.

11 MR. HUGHES: I'm going to join that
12 objection. Sorry. I don't have to join.

13 Q (By Mr. Mulji) You can answer.

14 A What I was told was that each round of map drawing
15 and each public release was used as a way to inform the
16 negotiations that were happening behind closed doors.

17 So the more maps that were drawn and released
18 publicly the more opportunities there were to change the
19 dynamics that were happening behind closed doors.

20 Q I see. So one impact of the public proposals in
21 2011 you're talking about now is that it created more
22 opportunities to shift the negotiations.

23 Were there any other impacts of the release of sort
24 of two rounds of public proposals that you discussed
25 regarding the 2011 process?

1 MS. GOLDMAN: Objection, lack of
2 foundation, and calls for speculation.

3 A As a team when we talked about what happened in 2011
4 we talked a lot about how the Democratic commissioners
5 were collaborating and coordinating, and we talked about
6 how the maps that were released that year helped build a
7 strategy that was shared by both commissioners.

8 Q (By Mr. Mulji) Was that the case in the 2021
9 process?

10 A I think they tried.

11 Q Do you think they succeeded in sort of successful
12 coordination?

13 A No.

14 Q Was another impact of the multiple rounds of public
15 proposals in 2011 that the public had an opportunity to
16 comment on those?

17 MS. GOLDMAN: Objection, calls for
18 speculation, lack of foundation.

19 A In 2011 there were a number of public hearings held
20 across the state. I attended one informally as a private
21 citizen just to see how they worked.

22 And in 2021 there was a desire to have some kind of
23 public participation because of the pandemic that looked
24 like Zoom calls. Most of those opportunities happened
25 prior to the release of the first map, and there was not

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1 as much of a focus on getting public feedback prior to the
2 release of those first maps -- or after the release of
3 those first maps in September of 2021.

4 Q (By Mr. Mulji) Based on your conversations about and
5 study of the 2011 Commission, did public comment
6 continue -- Did public comment sort of extend to the
7 second round of proposals released by the two -- or by
8 each side of the Commission?

9 MS. GOLDMAN: Object.

10 Q (By Mr. Mulji) Let me clarify. You told me that
11 there was a sort of second round of public proposals
12 during the 2011 process, one by each side, essentially; is
13 that right?

14 MS. GOLDMAN: Objection, calls for
15 speculation, lack of foundation.

16 A Yes.

17 Q (By Mr. Mulji) Was there a round of public comment
18 on those proposals during the 2011 Commission to the
19 extent you know?

20 MS. GOLDMAN: Objection, vague, calls for
21 speculation, and lack of foundation.

22 A Can you restate the question?

23 Q (By Mr. Mulji) Was there an opportunity for the
24 public to weigh in on that second round of public
25 proposals?

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1 MS. GOLDMAN: In 2011?

2 MR. MULJI: In 2011.

3 MS. GOLDMAN: Objection, calls for
4 speculation, lack of foundation.

5 A That's my recollection, but I'd have to go back and
6 look at the website. They listed out when they had all of
7 their hearings and when they released their maps.

8 Q (By Mr. Mulji) Did you look at those proposals, the
9 public proposals released prior to the adoption of the
10 final map in 2011?

11 A Yes.

12 Q Did the second round of public proposals look like
13 the final enacted plan?

14 A I don't remember.

15 Q Okay. What were the discussions -- based on again
16 your study of the 2011 process and the conversations you
17 had about it -- about the district, Legislative District
18 in the Yakima Valley?

19 MS. GOLDMAN: Objection, vague, calls for
20 speculation, lack of foundation.

21 A Can you restate the question?

22 Q (By Mr. Mulji) Yes. Based on your review of what
23 happened in the 2011 redistricting process, what were the
24 discussions in 2011 around the Legislative District in the
25 Yakima Valley among commissioners and staff?

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1 A I was --

2 MS. GOLDMAN: Objection, calls for
3 speculation, and lack of foundation.

4 Q (By Mr. Mulji) You can answer.

5 MR. HUGHES: And vague.

6 A I was told that at least one commissioner met with a
7 private attorney, a private law firm here in Seattle, to
8 perform some basic legal analysis around whether or not a
9 majority-minority district could be drawn in the Yakima
10 Valley. Excuse me.

11 And that firm provided some analysis. I never saw
12 any documents, but I was told that some material was
13 prepared for presentation to at least one Democratic
14 commissioner and their staff outlining the ability to draw
15 a majority-minority district in the Yakima Valley.

16 Q (By Mr. Mulji) Are there any other ways in which
17 the -- When you say draw a majority-minority district are
18 you referring to the requirement of the Voting Rights
19 Act -- the potential requirement of the Voting Rights Act
20 to draw an opportunity district?

21 Is that what you're referring to?

22 MS. GOLDMAN: Objection, calls for a legal
23 conclusion, and vague.

24 A Yes, that's what I was told.

25 Q (By Mr. Mulji) Okay. Are there any other ways in

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1 which the Voting Rights Act figured into the discussion or
2 commentary that you saw related to the 2011 redistricting
3 process?

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

6 A Can you restate that question?

7 Q (By Mr. Mulji) Were there other discussions about
8 the Voting Rights Act in 2011 that you saw or heard of?

9 MS. GOLDMAN: Objection, calls for
10 speculation, lack of foundation.

11 A Yes.

12 Q (By Mr. Mulji) And what were those discussions?

13 A I believe I reached out to the attorney who produced
14 the document for the Democratic commissioner and staff.

15 Q And who was that attorney?

16 A Noah Purcell.

17 Q And what was your discussion with Mr. Purcell? Did
18 you speak to Mr. Purcell?

19 A Yes.

20 Q What did you talk about?

21 MR. HUGHES: I'm going to pause here.

22 Mr. Purcell is now the Solicitor General for the
23 State of Washington.

24 MR. MULJI: Oh, I'm sorry.

25 MR. HUGHES: Did you -- Do you mind if I

1 ask very briefly a question?

2 MR. MULJI: Why don't we go off record for
3 a moment.

4 MR. HUGHES: Thank you.

5 (Discussion off the record.)

6 MR. MULJI: We're back on the record.

7 Q (By Mr. Mulji) Yes, what did you discuss with
8 Mr. Purcell related to the 2011 redistricting process?

9 A I confirmed that Perkins Coie did provide some
10 analysis; that he had worked with a partner named Kevin
11 Hamilton, and that they had met with at least one
12 Democratic commissioner and staff, and that they
13 reviewed --

14 As it was explained to me, they reviewed and
15 provided a thumbs-up on the idea of drawing a majority-
16 minority district that would elect candidates of choice in
17 the Yakima Valley.

18 Q When you say elect candidates of choice, do you mean
19 elect candidates of choice of the Latino community in the
20 Yakima Valley?

21 A Yes.

22 Q Did they come to a conclusion that an opportunity
23 district was required in the Yakima Valley?

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion, and calls for speculation, and lack of

1 foundation.

2 Q (By Mr. Mulji) You can answer.

3 A No. What I was told was that they were looking at
4 what districts could be drawn, and they were more focused
5 on the ability to draw a district that would perform
6 rather than any requirements that they must draw a
7 district that could perform.

8 Q Was it your understanding that they looked into the
9 legal requirement for such a district, or was it that they
10 just looked into whether they could draw a district?

11 MS. GOLDMAN: Objection, compound, vague,
12 calls for speculation, and lack of foundation.

13 Q (By Mr. Mulji) You can answer.

14 A We didn't get to that level of detail.

15 Q Okay. And let me move on to another difference you
16 noted. You mentioned that in 2011 the Commission adopted
17 a plan, I think you said some number of hours before the
18 deadline; is that right?

19 A Yes.

20 Q Did you say how many?

21 A It was that evening.

22 Q Was there -- Did you watch the commission meeting --

23 MS. GOLDMAN: Objection.

24 Q (By Mr. Mulji) -- where the Commission adopted the
25 final Legislative District plan in 2011?

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1 A I don't remember watching it.

2 Q Okay. Did you discuss how that meeting went with
3 anyone?

4 A Yes.

5 Q Who was there? What did you discuss about that
6 final meeting of the Commission to adopt the 2011
7 Legislative District plan?

8 A In speaking with Adam Bartz during this past cycle,
9 he talked about how negotiations led up to the final
10 meeting, that there were actual maps that they voted on in
11 that final meeting, and that the commissioners' work was
12 effectively done when that meeting adjourned before the
13 midnight deadline.

14 Q And so they had a map they were looking at during
15 that public meeting?

16 A Yes.

17 Q Was there an opportunity for public comment at that
18 public meeting?

19 MS. GOLDMAN: Objection, calls for
20 speculation, and lack of foundation.

21 A I don't know because I wasn't there. I don't
22 remember talking about public feedback at that meeting.

23 Q (By Mr. Mulji) Are you familiar with the Open Public
24 Meetings Act?

25 A Yes.

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1 Q Have you provided guidance around the Open Public
2 Meetings Act?

3 A Yes.

4 Q Do you consider yourself pretty familiar with what
5 the requirements are of the Open Public Meetings Act?

6 A Yes.

7 MS. GOLDMAN: Objection, vague.

8 Q (By Mr. Mulji) Did the Open Public Meetings Act
9 require there to be public comment in 2011 at the final
10 Commission meeting?

11 MS. GOLDMAN: Objection, calls for a legal
12 conclusion, lack of foundation, and calls for speculation.

13 Q (By Mr. Mulji) You can answer.

14 A I never looked into the question of whether or not
15 public comment was required at that meeting.

16 Q So far we've discussed your role prior to January,
17 2021 in the redistricting process. Starting in January of
18 2021 you officially became -- I guess your title became
19 Redistricting Counsel; correct?

20 A (Nodded.)

21 Q What was your role from that point going forward in
22 the redistricting process?

23 A Once we hired Ali O'Neil to serve directly for
24 Commission Brady Walkinshaw, I, along with Matt Bridges,
25 took on roles within the caucus to help Ali and to help

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1 Commissioner Walkinshaw.

2 So Ali O'Neil had never held a position with the
3 Legislature. She had never had any experience in
4 redistricting, the subject matter, the process; and so I
5 was someone who helped her learn pretty quickly the ins
6 and outs of the redistricting process.

7 And I provided my services as a sounding board as
8 she became more involved in the day-to-day operations of
9 the Commission as well as the duties of Commissioner
10 Walkinshaw.

11 Q I want to go back to one thing we discussed earlier,
12 your conversation with Mr. Purcell. I want to note -- I
13 want to confirm my understanding from our conversation off
14 record that you didn't understand --

15 You understood that you didn't have an
16 attorney-client relationship with Mr. Purcell; is that
17 right?

18 A That is correct.

19 Q Okay. So you on-boarded and trained Ms. O'Neil.
20 Did you have any other duties related to
21 redistricting?

22 A Yes.

23 Q And what were those?

24 A My role was two-fold, I think. One was to help Ali
25 navigate the stakeholder community. I had had existing

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1 relationships with many of these people that she didn't
2 know previously, and so especially in the early stages I
3 would help her understand sort of who the key players
4 were.

5 The second piece was that whenever a question would
6 arise within our internal team around compliance with
7 state and federal law I would take a first pass at
8 answering those questions.

9 Q In this -- So in this second role you were sort of
10 the go-to -- Were you sort of the go-to person for all
11 questions related to compliance with the Voting Rights Act
12 as well?

13 MS. GOLDMAN: Objection, vague.

14 A Yes.

15 Q (By Mr. Mulji) And that was within the Senate
16 Democratic Caucus team?

17 A Yes.

18 Q And who were the members of this team that were
19 working on the redistricting process?

20 A Within our caucus?

21 Q Yes.

22 A Ali O'Neil, who was an employee -- or was a
23 Redistricting Commission staffer who was employed by the
24 Senate Democratic Caucus. Myself and Matt Bridges, who
25 were paid a small stipend to do redistricting work in

1 addition to our existing duties for the caucus.

2 And Adam Bartz, who was the executive director of
3 the campaign committee had an unpaid and informal role.

4 Q Any other members of the team who worked on
5 redistricting?

6 MS. GOLDMAN: Objection, vague.

7 A The Senate counsel would help on some thornier HR
8 and public records questions.

9 Q (By Mr. Mulji) Was Senate counsel involved at all
10 with compliance -- Was Senate counsel involved in
11 questions related to the Voting Rights Act?

12 A No.

13 Q Other than supporting and training and on-boarding
14 Ali O'Neil and providing your team an understanding of the
15 requirements of the Voting Rights Act and other federal
16 and state laws, did you have other duties related to the
17 redistricting process in your role?

18 A Especially early on I would help coordinate
19 communications with other relevant state agencies, so the
20 Attorney General's Office, the Secretary of State's
21 Office. Those were the main ones.

22 Q Did that role include sort of evaluating map
23 proposals that came through to the Senate Democratic
24 Caucus from the Commission negotiations?

25 MS. GOLDMAN: Objection, vague.

1 A Can you restate the question?

2 Q (By Mr. Mulji) Yes. I guess did your -- Was one of
3 your duties to evaluate map proposals from the
4 negotiations?

5 A Yes. Everyone on our team would evaluate and
6 provide feedback on what they would see.

7 Q So when you got -- Say when Commissioner Walkinshaw
8 got a proposal from another commissioner for a district,
9 all members of your team would take a look and provide
10 feedback?

11 A Yes.

12 Q Did you have a particular focus when you were
13 looking at map proposals compliance with any particular
14 laws?

15 A Yes.

16 Q Which ones?

17 A The federal Voting Rights Act.

18 Q Okay. Did you conduct any mapping yourself during
19 the redistricting process?

20 A No.

21 Q Who was primarily responsible for mapping on your
22 team?

23 A Matt Bridges.

24 Q And to be clear, you mentioned it sounds like you
25 were sort of a four-person team: You, Ali O'Neil, Matt

1 Bridges and Adam Bartz.

2 Was your role to support Commissioner Walkinshaw in
3 his job?

4 A That's how it was envisioned, yes.

5 Q Was it your understanding that that's also how all
6 the other caucuses operated with respect to the caucus
7 staff and commissioners?

8 A No.

9 MS. GOLDMAN: Objection, calls for
10 speculation, lack of foundation.

11 Q (By Mr. Mulji) Do you know how other caucus staff
12 sort of structured their work on redistricting?

13 A I'm reluctant to answer that question because I
14 think what I knew is different from what has subsequently
15 been released through public records requests and news
16 coverage of redistricting.

17 Q What do you mean by that?

18 A I think that in our internal conversations with the
19 House Democratic Caucus staff, with the House Democratic
20 Commissioner, we had a sense who we thought their team
21 was, and I think that they had additional people who were
22 informally advising and had an outsider's role in their
23 work.

24 Q You're talking specifically about the House
25 Democratic Caucus?

1 A Yes.

2 Q Who were informal advisers? Who were these informal
3 advisers that you're talking about?

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

6 A Recent news coverage has indicated that Lindsey Grad
7 and Kurt Fritts played a significant role in advising
8 April Sims.

9 Q (By Mr. Mulji) Who is Lindsey Grad?

10 A She is a lobbyist for SEIU 1199.

11 Q And the second person was Kurt Fritts. Who is that?

12 A Kurt Fritts was a Commission -- was a caucus staffer
13 during the 2000 redistricting cycle who subsequently had a
14 number of positions, including most recently being
15 involved in independent expenditures during -- in the
16 Washington state legislative races and statewide
17 initiatives over the last several campaign cycles.

18 And I spoke with Kurt informally twice before
19 January, 2021, and only in the last couple of weeks have I
20 come to realize that he was advising the House Democratic
21 Caucus's commissioner throughout the process.

22 Q Okay. And you didn't know this as the process was
23 going on?

24 A No.

25 Q Okay. What's your understanding of the advice that

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1 Kurt Fritts provided to Ms. Sims during the redistricting
2 process?

3 MS. GOLDMAN: Objection, calls for
4 speculation, lack of foundation.

5 Q (By Mr. Mulji) You can answer.

6 A I don't know.

7 Q We've talked about your duties and your position
8 related to redistricting.

9 A (Nodded.)

10 Q What are your sort of -- Do you believe you were
11 well equipped for this role during the redistricting
12 process?

13 MS. GOLDMAN: Objection, vague.

14 A Can you restate the question?

15 Q (By Mr. Mulji) I guess what I'm getting at is do
16 you believe you were qualified for the role that you held
17 related to the redistricting process?

18 A Yes.

19 Q What are some of those qualifications?

20 A I've staffed the State Government and Elections
21 Committee and its predecessors for nine years. Included
22 in that committee's jurisdiction is all legislation
23 related to the Open Public Meetings Act, the Public
24 Records Act, the Redistricting Commission Statute, the
25 state Voting Rights Act, as well as advising members on

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1 federal lawsuits relating to the voting rights litigation
2 in Washington state.

3 Q Have you spent significant time reviewing the
4 provisions of the Voting Rights Act, the federal Voting
5 Rights Act?

6 A Yes.

7 Q Have you spent significant time reading case law
8 related to the federal Voting Rights Act?

9 MS. GOLDMAN: Objection as to form.

10 A Yes.

11 Q (By Mr. Mulji) Do you feel like you have a
12 comfortable grasp of what knowledge you have on the Voting
13 Rights Act, --

14 MS. GOLDMAN: Objection.

15 Q (By Mr. Mulji) -- the federal Voting Rights Act?

16 MS. GOLDMAN: Objection, vague.

17 Q (By Mr. Mulji) Let me ask the question again.

18 Do you have a comfortable grasp of federal Voting
19 Rights Act doctrine?

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

22 Q (By Mr. Mulji) You can answer.

23 A Yes, when I have my laptop in front of me.

24 Q As is the case for all of us.

25 Okay. In your role can you tell me about your

1 relationship with Brady Walkinshaw?

2 MS. GOLDMAN: Objection, vague.

3 Q (By Mr. Mulji) Let me ask a more specific question.

4 Well, what was the nature of your working
5 relationship? How did you -- How did you communicate with
6 Mr. Walkinshaw during the redistricting process, if you
7 did?

8 MS. GOLDMAN: Objection, compound.

9 A In the early stages of redistricting, so say the
10 first six months of 2021, I didn't have much of a
11 relationship with him. I was on a handful of conference
12 calls, Zooms with him. I had maybe two or three phone
13 calls.

14 But he made clear that he wanted everything to run
15 through Ali O'Neil, so most of what he heard or saw from
16 me would be routed through Ali.

17 Q (By Mr. Mulji) That was you said during the early
18 part of the redistricting process.

19 A (Nodded.)

20 Q Did that change or evolve over time?

21 A Yes. We had more frequent meetings as a team with
22 him subsequent to the first release of the map because
23 we -- Our team believed that we needed to engage an expert
24 on the Yakima Valley, and we needed Brady's sign-off.

25 He also made public comment about compliance with

1 the federal Voting Rights Act, which required more
2 meetings and more coordination.

3 And then finally in the week prior to the
4 redistricting deadline our team worked out of his offices
5 at Grist, so we would usually see him once a day for 30
6 minutes to an hour.

7 Q And when these more frequent meetings started you
8 said it was after the release of the public proposals; is
9 that right?

10 A (Nodded.)

11 Q Which -- There were two public proposals releases.

12 MS. GOLDMAN: Objection, vague.

13 Q (By Mr. Mulji) Which -- At what point --

14 After which public release did you begin working or
15 speaking more frequently with Commissioner Walkinshaw?

16 A After the initial release of the first round of maps
17 in mid September.

18 Q And at that point did you start having regular
19 check-ins with Commissioner Walkinshaw?

20 A We had more frequent conversations. Regular would
21 probably be generous.

22 Q Approximately how many times a week?

23 A If we saw Commissioner Walkinshaw more than once a
24 week it was unusual.

25 Q Were you in touch with Commissioner Walkinshaw by

1 email or by some other internet communication?

2 A With only a few exceptions, everything was routed
3 through Ali. So we would either talk to Ali in a meeting,
4 I'd have a phone conversation with Ali, or I would pass on
5 an email to her.

6 I did not have a lot of direct communication with
7 the Commissioner himself.

8 Q When you did have direct communications with
9 Commissioner Walkinshaw what did you typically discuss?

10 MS. GOLDMAN: Objection, vague.

11 A Usually when I talked to him in a meeting or one on
12 one it would be because I felt like he needed to
13 understand something around requirements under state and
14 federal law, and I would feel like he wasn't getting it.
15 He wasn't understanding the nature of the problem.

16 Q (By Mr. Mulji) Are you talking specifically about
17 the federal Voting Rights Act?

18 A That was one of the things.

19 Q What did you feel like you needed to help
20 Commissioner Walkinshaw understand about the federal
21 Voting Rights Act?

22 A He didn't have any real foundational knowledge of
23 the federal act, so we spent whatever time we could get
24 with him talking through with him why it was important,
25 what the significance was, the mechanics of the law; but

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1 we didn't have I would say nearly enough time for him to
2 really become an expert or even conversant in the law.

3 Q Did you feel you were able to convey why the law was
4 important in your conversations with him?

5 MS. GOLDMAN: Objection, vague.

6 A I don't know.

7 Q (By Mr. Mulji) How many conversations would you say
8 you had -- that is, live conversations -- with
9 Commissioner Walkinshaw about the Voting Rights Act during
10 the redistricting process?

11 MS. GOLDMAN: Objection, vague.

12 A I don't know. It would come up in every recurring
13 meeting we would have after the release of the September
14 maps, and I had a couple of pretty direct conversations
15 with him when we were working out of his office
16 immediately prior to the deadline.

17 Q (By Mr. Mulji) Did you send Commissioner Walkinshaw
18 any written materials related to the Voting Rights Act
19 during the redistricting process?

20 A I don't remember, but it wouldn't surprise me.

21 Q What was -- Well, what was your --
22 What was your understanding of what the Voting
23 Rights Act requires?

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion, vague.

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1 A Our team understood that if criteria were met under
2 the Act and under the existing case law, that we would be
3 required to draw a district that allowed Latino voters to
4 elect their candidate of choice.

5 Q (By Mr. Mulji) For our purposes during this
6 deposition is it okay if we call them district and
7 opportunity district as a shorthand?

8 A Sure.

9 Q Okay. And what were the requirements as you
10 understood them that needed to be satisfied for an
11 opportunity district to be required in the Yakima Valley?

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

14 A What I explained to the Commissioner was that we
15 needed to understand whether or not a compact district
16 could be drawn, whether we could demonstrate racial
17 polarization, and whether White voters thwarted minority
18 voters' ability to elect candidates of choice.

19 Q (By Mr. Mulji) And you communicated your
20 understanding that those were the requirements to
21 Commissioner Walkinshaw?

22 A Many times.

23 Q How many times would you say?

24 A Many.

25 Q In those conversations what questions did

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1 Commissioner Walkinshaw have about the requirements of the
2 Voting Rights Act, if any?

3 A I don't remember him having a lot of questions. I
4 don't remember him being particularly curious.

5 Q In an abstract sense or in, I guess, a general sense
6 did you have the impression in your conversations with
7 Commissioner Walkinshaw that he cared about the Voting
8 Rights Act?

9 MS. GOLDMAN: Objection, calls for
10 speculation, lack of foundation.

11 Q (By Mr. Mulji) You can answer.

12 A We -- I was part of a team that spent a lot of time
13 crafting a public message, and that was reflected in
14 conjunction with the map that was released in October by
15 Commissioner Walkinshaw that we believed was compliant
16 with the federal VRA where he talked about how it was
17 important to him.

18 In our one-on-one conversations it was clear to me
19 that he was not willing to fight very hard for an
20 opportunity district.

21 Q What did he say that made that clear to you?

22 A About a week prior to the redistricting deadline
23 myself and maybe one or two other people on our team were
24 standing with him and telling him why it was important
25 that an opportunity district be drawn in the Yakima

1 Valley; that it was important that we comply with the
2 federal act; and that if he could not secure an
3 opportunity district in the Yakima Valley, that we should
4 let the redistricting process go to the courts because the
5 court would.

6 What he said in response -- In response to this he
7 winced and said, "Gee, I don't know. That sounds tough."

8 Q What did you understand that to mean?

9 MS. GOLDMAN: Objection, calls for
10 speculation, lack of foundation.

11 A That he wasn't going to push Commissioner Sims on
12 the question, and that he had already made up his mind
13 that the final map would not include a majority-minority
14 district -- excuse me, an opportunity district.

15 Q (By Mr. Mulji) And when was this conversation, you
16 said?

17 A It would have been less than a week before the
18 deadline.

19 Q So a week prior to the deadline Commissioner
20 Walkinshaw had already decided that he was okay with the
21 map not having an opportunity district?

22 A Yes.

23 Q You had already communicated to him at that point,
24 as you said many times, that it was legally required to
25 have an opportunity district in the Yakima Valley; is that

1 right?

2 MS. GOLDMAN: Objection, calls for a legal
3 conclusion.

4 A I was very careful with my words about whether or
5 not we were required under the law. The -- There were two
6 issues for us. One was whether we were drawing a map that
7 was defensible that looked like an opportunity district,
8 that you could argue was an opportunity district.

9 And the second issue was that it was clear that the
10 other commissioners wanted to generate a very specific
11 outcome in the Yakima Valley, which I had serious
12 reservations about.

13 Q (By Mr. Mulji) Okay. So the -- Well, --

14 THE WITNESS: Before you ask your next
15 question could we take maybe a five-minute break?

16 MR. MULJI: It's about an hour, so we can
17 do that.

18 (Break 10:04 a.m. to 10:15 a.m.)

19 MR. MULJI: We're back on the record.

20 Q (By Mr. Mulji) We were discussing before the break
21 sort of your communications with Commissioner Walkinshaw
22 about the requirements of the Voting Rights Act.

23 MR. MULJI: I want to actually turn to an
24 exhibit. I'm going to mark -- I'll ask to mark Exhibit 1
25 a document labeled C for the court reporter. And my

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1 colleague Ben will --

2 MS. GOLDMAN: Can I have a copy?

3 MR. MULJI: -- also drop it in the chat.

4 MS. GOLDMAN: Thank you.

5 MR. BOWEN: Thank you.

6 MS. GOLDMAN: This is Exhibit 1?

7 THE REPORTER: Exhibit 1.

8 (Hall Exhibit No. 1 introduced.)

9 Q (By Mr. Mulji) Adam, have you seen this document
10 before?

11 A Yes. Excuse me. Yes.

12 Q What is it?

13 MR. BOWEN: Counsel, can I ask that we wait
14 until the exhibit is in the chat?

15 MR. MULJI: Oh, I'm sorry. Yes, I will do
16 that. I can also drop it in. Oh, you might have some
17 trouble doing it that way.

18 MR. PHILLIPS: Is it --

19 MR. MULJI: No. Here, let me do it.

20 MR. PHILLIPS: Did it go?

21 MS. GOLDMAN: Yes, something got shared.

22 MR. MULJI: Is that it?

23 MR. BOWEN: Yes. I'm downloading it right
24 now.

25 MR. MULJI: I think that's a --

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1 MS. GOLDMAN: 709?

2 MR. MULJI: No, sorry. Let me do it. I
3 can throw it in there.

4 Brennan, let me know when you --

5 MR. BOWEN: I was able to pull it up.
6 Thank you.

7 MR. MULJI: Okay. Great.

8 Q (By Mr. Mulji) All right. Adam, have you had a
9 chance to review this document?

10 A Yes.

11 Q What is it?

12 A This was talking points that I provided to
13 Commissioner Walkinshaw after the release of the first
14 round of maps.

15 Q Okay. And you sent this email to Commissioner
16 Walkinshaw, and you cc'd Ali O'Neil, Adam Bartz and
17 Matt Bridges; correct?

18 A Yes.

19 Q And that was the email is dated Friday,
20 September 24th; is that right?

21 A Yes.

22 Q Okay. And you said they were talking points on the
23 legislative -- Republican Legislative District proposals?

24 A Yes.

25 Q You put in parentheses in the subject line Yakima

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1 Valley. The focus of the talking points you were
2 providing was on the Yakima Valley District; is that
3 right?

4 A Yes.

5 Q Did Brady ask for these talking points?

6 A I believe so. I don't remember whether it was
7 something that we had talked about as a staff to team
8 project to him unsolicited, or whether he requested it
9 specifically.

10 (Court reporter request for clarification.)

11 A I don't remember if this was specifically requested.
12 It may have been.

13 Q I want to start down at the bottom of this document,
14 at the bottom of the first page, the last bullet point.

15 Do you see the bullet point starting Factors Under
16 Gingles?

17 A Um-hmm. Yes.

18 Q What are you communicating in that bullet point?

19 MS. GOLDMAN: Objection, it speaks for
20 itself.

21 Q (By Mr. Mulji) You can answer.

22 A I was trying to outline for him how the federal law
23 works.

24 Q And you specifically provided him here the
25 requirements under Gingles v. Thornburg [sic]; is that

1 right?

2 A Yes.

3 Q And I think when you told me earlier that you had
4 communicated to Commissioner Walkinshaw about compactness
5 and racially polarized voting, are these Gingles elements
6 what you're referring to?

7 A Yes.

8 Q Okay. And you communicated to him that the racial
9 or minority group has to be sufficiently large and
10 geographically compact to constitute a majority in a
11 single-member district; correct?

12 MS. GOLDMAN: Objection, the exhibit speaks
13 for itself.

14 Q (By Mr. Mulji) You can answer.

15 A Yes.

16 Q And the last two bullets on the second page, you had
17 mentioned that you had communicated to Commissioner
18 Walkinshaw that there was a requirement to show that there
19 was racially polarized voting.

20 What do you understand racially polarized voting to
21 mean?

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

24 A Without my laptop and Lexis account in front of me,
25 what I described this to mean is that you were looking for

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1 a significant disparity in how White voters versus members
2 of a minority group would vote in a particular area.

3 Q (By Mr. Mulji) What was your understanding of how
4 the Voting Rights Act applied in the Yakima Valley?

5 MS. GOLDMAN: Objection, calls for a legal
6 conclusion, vague.

7 A Can you restate the question?

8 Q (By Mr. Mulji) Yes. What was your understanding of
9 how the Voting Rights Act applied in the Yakima Valley?

10 MS. GOLDMAN: Same objections.

11 A I knew that there had been a successful lawsuit in
12 the City of Yakima at the time, and I was aware of the
13 fact that the Legislative Districts here overlapped
14 significantly with that region.

15 So that when I advised the Commissioner, my
16 colleagues or legislators I said that the litigation in
17 the region over the past ten years means that we had to be
18 very careful in what we did in drawing district boundaries
19 because there had already been a finding of racial
20 polarization in the region.

21 Q (By Mr. Mulji) Okay. When you say lawsuits in the
22 region, you're referring to lawsuits that pertain to --
23 that relate to the Voting Rights Act in the Yakima Valley
24 region?

25 A Yes.

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1 Q What lawsuits were you aware of?

2 A The primary case we discussed was the city lawsuit,
3 Montes v. Yakima.

4 I also was aware of the settlement in the City of
5 Pasco, and I don't remember at what stage the two county
6 suits in Franklin and Yakima County were in when I wrote
7 this email.

8 Q Okay. At the very -- It would seem looking at the
9 second bullet point in Exhibit 1, is it fair to say that
10 you're here informing Commissioner Walkinshaw of at least
11 two of the lawsuits that you mentioned?

12 A Yes.

13 Q Which ones?

14 A The Montes v. Yakima case that was regarding the
15 City Council in Yakima, and the suit against the --
16 against the County of Yakima over its three district
17 commission form.

18 Q And you informed him that in both cases the
19 plaintiffs in those lawsuits established that there was
20 racially polarized voting in the region?

21 MR. HUGHES: Object to form.

22 MS. GOLDMAN: Object to the degree it calls
23 for a legal conclusion.

24 A Can you --

25 MS. GOLDMAN: And it speaks for itself.

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1 Exhibit 1 speaks for itself.

2 A Can you restate the question?

3 Q (By Mr. Mulji) You communicated to

4 Commissioner Walkinshaw that plaintiffs in both of those

5 cases established that there was racially polarized voting

6 in the Yakima Valley region?

7 MS. GOLDMAN: Objection.

8 Q (By Mr. Mulji) Is that right?

9 MS. GOLDMAN: That's not what the document
10 says.

11 A Yes, but I don't remember if that county lawsuit had
12 been resolved at the time.

13 Q (By Mr. Mulji) I see. Okay. Separate from this
14 email did you try to make Commissioner Walkinshaw aware of
15 the lawsuits we just discussed related to voting rights in
16 the region?

17 MS. GOLDMAN: Objection, vague.

18 A Can you restate the question?

19 Q (By Mr. Mulji) Yes. Separate from this email,
20 generally speaking throughout the redistricting process
21 did you make an attempt to make Commissioner Walkinshaw
22 aware of these lawsuits?

23 A Yes.

24 Q And in what ways?

25 A The caucus generated a document in the first eight

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1 months of 2021 articulating our principles and priorities,
2 and one of those priorities was to increase representation
3 for historically marginalized groups. And one of the ways
4 in which that was an issue historically was how the
5 districts were drawn in the Yakima Valley.

6 So I don't recall whether the document itself
7 highlighted the Yakima Valley; but the principle of that,
8 of addressing representation for an underrepresented group
9 had come up, and this would be sort of the classic example
10 that I would provide in those discussions.

11 Q And those discussions, when were those discussions
12 about sort of the broad principles and priorities
13 occurring?

14 A We probably had less than half a dozen meetings with
15 key legislators and the Commissioner before the document
16 was produced and then shared with our counterparts in the
17 House Democratic Caucus.

18 Q At what time were these conversations occurring?
19 Was it early in the redistricting process?

20 MS. GOLDMAN: Objection, compound, vague.

21 Q (By Mr. Mulji) You can answer.

22 A I believe we shared the document with -- the
23 finalized document with our House Democratic counterparts
24 before August 1st.

25 Q Okay. So before August you had brought at least the

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1 Montes v. Yakima case to the attention of Commissioner
2 Walkinshaw?

3 A Yes.

4 Q And you said that that document was also shared with
5 the House Democratic Caucus; is that right?

6 MS. GOLDMAN: Objection, vague.

7 A Yes.

8 Q (By Mr. Mulji) Did you share that document with
9 Commissioner Sims?

10 A I didn't.

11 Q Is it your understanding that someone else did?

12 A Yes.

13 Q Who shared that document with Commissioner Sims?

14 MS. GOLDMAN: Objection, calls for
15 speculation, lack of foundation.

16 Q (By Mr. Mulji) You can answer.

17 A It is my understanding that either Ali O'Neil shared
18 it with her counterpart, or Commissioner Walkinshaw shared
19 it with his.

20 Q Have you spoken to Commissioner Sims -- Did you
21 speak to Commissioner Sims at all throughout the
22 redistricting process?

23 A I was in meetings with her.

24 Q How frequently did you communicate with
25 Commissioner Sims?

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1 A I was probably in no fewer than three but no more
2 than ten meetings with her.

3 Q Okay. Did those meetings typically concern
4 discussions of the Voting Rights Act?

5 A At the end, yes.

6 Q Okay. Did you speak with Commissioner Sims during
7 these meetings?

8 A I believe I spoke in those meetings, yes.

9 Q Okay. And did you -- Did you talk about the
10 requirements of the Voting Rights Act as you understood
11 them during these meetings?

12 A Yes.

13 Q Did you communicate the same understanding --
14 Did you communicate the same things about the Voting
15 Rights Act with Commissioner Sims as you communicated with
16 Commissioner Walkinshaw?

17 MS. GOLDMAN: Objection, vague.

18 Q (By Mr. Mulji) Let me reask the question.

19 You told me earlier that you were -- you wanted to
20 give Commissioner Walkinshaw what you thought was sort of
21 an accurate understanding of the Voting Rights Act;
22 correct?

23 A Yes.

24 Q Did you try to convey that same understanding to
25 Commissioner Sims?

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1 MR. HUGHES: Objection, vague.

2 A Most of my conversations with this level of detail
3 would have been with my counterpart in the House
4 Democratic Caucus. In meetings with Commissioner Sims
5 generally speaking staff tried not to speak.

6 Q (By Mr. Mulji) And who was your counterpart in the
7 House Democratic Caucus?

8 A Alec Osenbach.

9 Q And you said you -- Did you communicate about the
10 Voting Rights Act in about the level of detail in
11 Exhibit 1 with Alec Osenbach?

12 A Yes.

13 Q And in your conversations with him, how frequently
14 did you speak with Alec Osenbach?

15 A Twice.

16 Q What was his position?

17 MS. GOLDMAN: Objection, vague.

18 A Can you reask the question?

19 Q (By Mr. Mulji) Yes. What position did he hold in
20 the House Democratic Caucus?

21 A He is policy counsel for the House Democratic
22 Caucus, so he has a job that's very similar to mine. He
23 staffs different committees.

24 Q Okay. And was it did you speak about sort of his
25 role in the House Democratic Caucus redistricting work?

1 A Can you --

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

3 Q (By Mr. Mulji) Yes. Did you talk about what his
4 role was in the redistricting process during these phone
5 calls?

6 A Not really. I was asked to talk with him to explain
7 a lot of this kind of material. So I think because he was
8 aware, they wanted to have somebody talk to me about these
9 issues. That was the first conversation.

10 Q When you say this material, are you referring to
11 sort of your detailed understanding of what the Voting
12 Rights Act requires in the Yakima Valley?

13 A Correct.

14 Q What did you convey to Alec Osenbach about the
15 Voting Rights Act?

16 A That we needed to hire an expert.

17 Q Anything else?

18 A I mean, I -- I tried to sort of walk through this as
19 much as possible; but at the time the issue was that we as
20 a team had identified a need to hire an outside expert,
21 and the House was pushing back pretty hard. They didn't
22 want to share the expense.

23 Q When did your conversation with Alec Osenbach occur?

24 A It would have been right around here. It would have
25 been before we signed the contract with Dr. Barreto.

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1 Q Okay. Was the primary goal of that, of that
2 meeting, to convince Mr. Osenbach that you needed to hire
3 an expert on the Voting Rights Act?

4 A Yes.

5 Q Okay. Did you get the sense that -- Well, what
6 questions did Mr. Osenbach have about the Voting Rights
7 Act?

8 A He didn't ask a lot of questions. We talked a lot
9 about what I had identified here and explained the value
10 that hiring an expert would bring.

11 Q And I'm sorry, we've been talking about this in the
12 abstract because we haven't gone through everything you
13 said in this email, so maybe we should do that.

14 I just want to point out, so in bullet point three
15 do you see where you said, "There is a strong chance our
16 Commission will likely be required to draw under federal
17 law, and the failure -- draw one under federal law, and
18 the failure to do so will result in a lawsuit striking
19 down that map."

20 Do you see that?

21 A Yes.

22 Q You're referring to your belief that it was required
23 under the federal Voting Rights Act to draw an opportunity
24 district; is that right?

25 MR. HUGHES: Objection, misstates the

1 document.

2 MS. GOLDMAN: Objection, calls for a legal
3 conclusion.

4 Q (By Mr. Mulji) You can answer.

5 A I'm hesitating because I don't remember when CVAP
6 information was made available. It wasn't crystal clear
7 to us that we would be required to draw one until we saw
8 the CVAP data in our software.

9 There was a period of time in which we did not have
10 the CVAP data, and we were guessing; but that's why I used
11 the words will likely, because for a long time we weren't
12 100 percent certain as to whether or not we would be
13 required to draw one.

14 It was more clear based on these maps that two of
15 the commissioners were trying intentionally to crack the
16 region.

17 Q What's the relevance of CVAP to the question of
18 whether an opportunity district is required under the
19 federal Voting Rights Act?

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

22 Q (By Mr. Mulji) And to be -- And before you answer
23 that question, when you say CVAP you're referring to
24 citizen voting age population; right?

25 A Correct.

1 Q Okay. And let me reask the last question.

2 What is the relevance of CVAP to the question of
3 whether or not an opportunity district is required under
4 the federal Voting Rights Act?

5 MS. GOLDMAN: Objection, calls for a legal
6 conclusion.

7 A My understanding is that any legal analysis under
8 the federal Voting Rights Act would rely on citizen voting
9 age population, not simply voting age population. And for
10 a long stretch of time in the software that we were using
11 we only had access to voting age population.

12 Q (By Mr. Mulji) What software was that?

13 A Dave's Redistricting App.

14 Q Okay. So for a certain period of time you didn't
15 have access or didn't see citizen voting age population
16 data in Dave's Redistricting; is that right?

17 A It wasn't Dave's fault. It was getting the
18 information from the Census Bureau.

19 Effectively we were sent -- We were told that CVAP
20 was not going to be available for a certain period of
21 time, and right around the time at which the first maps
22 were released publicly was when CVAP finally was loaded
23 into the software.

24 Q I see. And when you say CVAP, what data
25 specifically are you referring to in Dave's Redistricting?

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1 MR. HUGHES: Objection, vague.

2 A Can you reask the question?

3 Q (By Mr. Mulji) Yes. Well, at the time -- I'm
4 wondering what dataset, if you recall, you were looking at
5 to determine Latino CVAP at the time on Dave's
6 Redistricting App.

7 MS. GOLDMAN: Objection, vague, calls for
8 speculation, and lack of foundation.

9 Q (By Mr. Mulji) You can answer.

10 A When drawing maps we were able to discern what
11 percentage a given district was based on race; and so when
12 we would click on those tabs to understand what it was, we
13 would see that it was based on voting age population, not
14 citizen voting age population.

15 Q And is it your understanding that the citizen voting
16 age population data is provided by the American Community
17 Survey of the U.S. Census Bureau?

18 A Yes.

19 Q And did you have access to -- Am I right that you
20 had access to the 2019 estimates under the American
21 Community Survey at that time?

22 MS. GOLDMAN: Objection, vague.

23 A I don't recall any CVAP data being in the system
24 before we got the most recent data uploaded shortly after
25 the release of the first maps.

1 Q (By Mr. Mulji) Okay. And then after that point were
2 you -- You were looking at 2019 American Community
3 Survey's CVAP estimates; is that right?

4 A The most recent CVAP data, yes.

5 Q Okay. And was it your understanding that the most
6 recent CVAP data at that time was the 2019 American
7 Community Survey data?

8 A I don't remember.

9 Q Okay. You said that -- You said that two of the --
10 the two Republican commissioners had drawn maps that crack
11 the Latino population in the Yakima Valley.

12 What do you mean by that?

13 MR. HUGHES: Objection, calls for a legal
14 conclusion.

15 MS. GOLDMAN: Join.

16 A When the four maps were made public our team were
17 looking at different pieces of the Republican proposed
18 maps. Those were the maps that we had not seen prior to
19 their public release.

20 So my task was to take some time and look at what
21 had been done in the Yakima Valley. It was clear to me
22 that the ways in which the two Republican commissioner
23 proposals were drawn, that they were both inconsistent
24 with public testimony that the Commission had received
25 about drawing districts in the Yakima Valley, and that the

1 Yakima Valley had been divided into enough Legislative
2 Districts that we needed to take a real serious look at
3 whether or not they -- adopting such a map would violate
4 the Federal Act.

5 Q (By Mr. Mulji) When you used -- When you use the
6 term in this email crack the Latino population in the
7 Yakima Valley, what does that mean in particular?

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

10 A My understanding of voting rights case law is that
11 there are two things that you can do. You can crack, or
12 you can pack. Both of those can be used to dilute the
13 voting power of minority groups.

14 So in this instance they had taken Latino voters who
15 could reasonably be drawn within a single district and
16 provide -- and establish an opportunity district. But the
17 Republican commission proposals instead split them, I
18 believe, between three districts in one map and four in
19 the other.

20 Q (By Mr. Mulji) In the last sentence of this fourth
21 bullet point in Exhibit 1 you mentioned Latino voter
22 turnout. What's the relevance of Latino voter turnout to
23 the question of whether an opportunity district is
24 required under the federal Voting Rights Act?

25 MS. GOLDMAN: Objection, calls for a legal

1 conclusion.

2 A As I understand the requirements under the federal
3 law, it matters not whether the district is majority
4 minority but whether or not they have the ability to elect
5 candidates of choice; which means that if you draw a
6 district that is majority Latino by a bare minimum, the
7 fact that they historically vote at much lower rates,
8 especially in non-presidential elections, means that that
9 majority-minority district would not actually result in
10 any changes to the ability to elect candidates of choice.

11 Q (By Mr. Mulji) Was it your understanding that if you
12 drew a district that was say 50.1 Latino CVAP, would that
13 be sufficient to overcome the turnout disparity? Would
14 that be sufficient for Latinos to elect candidates of
15 their choice --

16 MS. GOLDMAN: Objection, calls --

17 Q (By Mr. Mulji) -- in the Yakima Valley?

18 MS. GOLDMAN: Objection, calls for a legal
19 conclusion, and vague.

20 MR. HUGHES: And calls for speculation, and
21 an incomplete hypothetical.

22 Q (By Mr. Mulji) You can answer.

23 A I told my colleagues and the Commissioner that
24 drawing a district that was 50.1 would not allow Latino
25 voters to elect a candidate of choice.

1 Q And what was the basis of your belief?

2 MS. GOLDMAN: Objection to the degree it
3 calls for a legal conclusion.

4 Q (By Mr. Mulji) You can answer.

5 A That was based on legal research, conversations with
6 national experts, and review of mapping data in Dave's
7 Redistricting App.

8 Q What mapping data did you review in Dave's
9 Redistricting App?

10 A Can you be more specific?

11 Q Yeah. You said you looked at -- That part of the
12 basis for your belief that 50.1 wouldn't be sufficient to
13 perform was data that you looked at in Dave's
14 Redistricting App.

15 What kind of data helped form the basis of your
16 belief about the 50.1 district?

17 A I would be looking at competition in the district.
18 I would be looking at voter turnout data from the
19 Secretary of State's website. I was looking at --

20 I think those were probably the primary two.

21 Q In the last sentence of bullet four on Exhibit 1 you
22 say that, "Since Latino voter turnout in the region has
23 been historically lower, these proposal give the
24 appearance of meeting this requirement but actually fails
25 to provide a historically marginalized community with an

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1 equal opportunity to elect the candidate of their choice."

2 Accounting for typos, is that right?

3 A Yes.

4 Q Okay. I want to hone in on the language you talk
5 about. You say "give the appearance of meeting this
6 requirement."

7 What was motivating you to -- What motivated --

8 Why did you point this out? Why does it matter what
9 the appearance, what appearances are?

10 MS. GOLDMAN: Objection to the degree it
11 calls for a legal conclusion.

12 A I was concerned that in public meetings of the
13 Commission commissioners would try to take credit for
14 listening to public feedback and compliance with the VRA
15 by drawing districts that look like they reflect the
16 requirements under federal law in public feedback without
17 actually doing so.

18 Q (By Mr. Mulji) Do you believe that's what any of the
19 commissioners in the 2021 redistricting process did?

20 MS. GOLDMAN: Objection to the degree it
21 calls for a legal conclusion.

22 A Yes.

23 Q (By Mr. Mulji) And why do you say that?

24 MS. GOLDMAN: Objection to the degree it
25 calls for a legal conclusion.

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1 A It was clear to me in the final days that at least
2 two commissioners were dead set on drawing a district that
3 was 50.1 Latino in the Yakima Valley, and that they were
4 not going to be moved off that position.

5 Q (By Mr. Mulji) Which two commissioners?

6 A Commissioners Fain and Graves.

7 Q Did you speak to Commissioner Fain and Graves at all
8 during the redistricting process?

9 A No.

10 Q Did you debrief meetings that any members of your
11 team had with Commissioner Graves and Fain?

12 A Yes.

13 MS. GOLDMAN: Objection, vague.

14 Q (By Mr. Mulji) Did you debrief any of the meetings
15 that Brady Walkinshaw had with Commissioner Fain and
16 Graves?

17 MS. GOLDMAN: Objection, vague.

18 A Yes.

19 Q (By Mr. Mulji) Based on your understanding of --
20 Well, what was your understanding of -- Let me reask the
21 question.

22 Did you have an understanding of why Commissioner
23 Fain and Graves were trying to draw, as you said, a 50.1
24 Latino CVAP district in the Yakima Valley?

25 MS. GOLDMAN: Objection, calls for

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1 speculation, and lack of foundation.

2 A Commissioner Walkinshaw reported back to the team
3 that there was no wiggle room; that this was going to be
4 something that the other commissioners were committed to
5 doing.

6 And so I reached out to several experts to talk to
7 them about why the Republican commissioners would be so
8 fixated on doing this.

9 Q (By Mr. Mulji) Okay. Which experts did you talk to
10 about this?

11 A Dr. Barreto. I believe I also spoke with Yuriy
12 Rudensky at the Brennan Center.

13 (Court reporter request for clarification.)

14 THE WITNESS: Yuriy Rudensky.

15 Q Any other experts that you spoke to about this
16 question?

17 A Not that I remember.

18 Q And when you say Dr. Barreto, you're referring to
19 Dr. Matt Barreto of the UCLA Voting Rights Project; is
20 that right?

21 A Yes.

22 Q And Yuriy -- and I'm not going to be able to say his
23 last name correctly, --

24 A Rudensky.

25 Q Rudensky, Yuriy Rudensky.

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1 Who is Yuriij Rudensky?

2 A Yuriij Rudensky is the redistricting counsel for the
3 Brennan Center at NYU.

4 Q In general what did they say about why the
5 Republican commissioners would be aiming to draw a 50.1
6 district, as you said, in the Yakima Valley?

7 MS. GOLDMAN: Objection, compound.

8 A Can you reask the question?

9 Q (By Mr. Mulji) Yes. What did Yuriij Rudensky have to
10 say about the question of drawing a 50.1 Latino CVAP
11 district in the Yakima Valley?

12 A I don't remember the details of that conversation.
13 I remember talking to Dr. Barreto and him saying that this
14 was a pretty common tactic to weaken plaintiffs' cases
15 when they brought VRA claims.

16 Q Say more about what the -- What do you mean by
17 tactic, or what did you understand tactic to mean?

18 MS. GOLDMAN: Objection, vague, calls for
19 speculation, and lack of foundation.

20 A He told me that it would be harder to -- for a
21 plaintiff to bring a claim if a district was drawn to be
22 50.1 because it showed that there was not an effort to
23 dilute voters to a significant margin, but rather that it
24 was a choice made by the commissioners where they made a
25 conscious decision to draw the district in this fashion.

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1 And I didn't totally understand his point, but he
2 was quite adamant that allowing the Commission to draw a
3 district in this fashion would be harmful to potential
4 plaintiffs.

5 Q (By Mr. Mulji) Coming out of these conversations
6 what was your understanding of what the effect would be of
7 drawing a 50.1 district that didn't perform to elect
8 Latino candidates of choice?

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

11 A It was my belief that adopting a map with this
12 district would not allow Latinos to elect candidates of
13 their choice and that it would weaken any lawsuit that
14 they would subsequently bring against the Commission.

15 Q (By Mr. Mulji) If an opportunity district is
16 required to be drawn in the Yakima Valley, is it
17 sufficient to draw a district that is a simple majority
18 Latino CVAP, --

19 MS. GOLDMAN: Object --

20 Q (By Mr. Mulji) -- or is there some other
21 requirement?

22 MS. GOLDMAN: Objection, calls for a legal
23 conclusion, and compound.

24 Q (By Mr. Mulji) You can answer.

25 A As was explained to me, as my research said it

1 mattered whether they had the opportunity to elect, not
2 whether there was a bare majority.

3 And in circumstances in which voting participation
4 rates were lower than the electorate at large, that you
5 needed to draw a district with a higher percentage to
6 account for that.

7 Q Was it your concern that if you draw a majority
8 Latino district that looks like you have a majority-
9 minority district but isn't actually, and if it doesn't
10 act --

11 Well, did you have a concern that drawing a
12 majority-minority district based simply on CVAP numbers,
13 like a 50.1 Latino majority district, that it would look
14 like it might provide them an opportunity to elect
15 candidates of their choice, but not actually?

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

18 MR. HUGHES: Could I actually hear that
19 question again, Jeanne?

20 (Question read back.)

21 MR. HUGHES: Thank you.

22 Q (By Mr. Mulji) You can answer.

23 MS. GOLDMAN: I want to make sure that I
24 objected, vague.

25 THE REPORTER: Yes.

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1 MS. GOLDMAN: Thank you.

2 A I'm sorry to do this. Enough time has passed. Can
3 you --

4 Q Yes.

5 A Was I concerned --

6 MS. GOLDMAN: Let him ask the question.

7 THE WITNESS: Sorry.

8 Q (By Mr. Mulji) You understood that an opportunity
9 district needed to allow Latino voters to elect their
10 candidates of choice; correct?

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

13 A Yes.

14 Q (By Mr. Mulji) You understood that -- Well, what did
15 that -- In order to determine whether a district elects
16 Latino voters' candidate of choice, what do you need to
17 look at to see if a district does that in practice?

18 MS. GOLDMAN: Objection, vague, and calls
19 for a legal conclusion.

20 MR. HUGHES: And calls --

21 MS. GOLDMAN: And compound.

22 MR. HUGHES: And calls for an expert
23 conclusion.

24 Q (By Mr. Mulji) You can answer.

25 A What I understood was that the Commission needed to

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1 draw a district in the Yakima Valley that allowed Latino
2 voters the chance to elect candidates of choice, and that
3 drawing a district that was 50.1 CVAP would not actually
4 do so but give them a fig leaf in public to say that it
5 did.

6 Q And was that because say a bare majority doesn't
7 take into account Latino turnout in the region? Is that
8 why?

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

11 A Yes.

12 Q (By Mr. Mulji) Okay. And so when you say -- So in
13 this email you say, "These proposal give the appearance of
14 meeting this requirement," is that the concern -- Is the
15 concern we just discussed, is that the concern you're
16 trying to convey?

17 MS. GOLDMAN: Objection, vague.

18 A Yes.

19 MR. MULJI: Okay. I want to mark as
20 Exhibit 2 the document labeled A. Here you go.

21 MR. PHILLIPS: And I can figure out how to
22 do this.

23 MR. MULJI: You've got it?

24 MR. PHILLIPS: Yes.

25 MR. MULJI: And Ben is placing that exhibit

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1 in the chat.

2 (Hall Exhibit No. 2 introduced.)

3 Q (By Mr. Mulji) Adam, I'll give you a few minutes to
4 just review this, review this document. Let me know when
5 you're done.

6 MR. BOWEN: I received it in the chat.
7 Thank you, guys.

8 (Pause in proceedings to review document.)

9 Q (By Mr. Mulji) Have you had a chance to review the
10 document?

11 A Yes.

12 Q Do you recognize this document?

13 A Yes.

14 Q What is it?

15 A It's an email I sent to our team roughly two weeks
16 before the deadline.

17 Q What was -- Well, actually, so this was sent on
18 November 2nd?

19 A Yes.

20 Q And the recipients included Matt Bridges, Ali
21 O'Neil, Adam Bartz, Paulette Avalos, and Commissioner
22 Walkinshaw?

23 A Yes.

24 Q What was happening around November 2nd that prompted
25 you to write this email?

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1 A Our team was struggling to get commissioners to
2 focus on drawing maps instead of simply negotiating on
3 partisan metrics.

4 Q And what do you -- I'm sorry. What do you mean by
5 that?

6 A Much of the negotiations in the final weeks was
7 based upon the idea of what districts performed at what
8 number for Democrats rather than drawing district
9 boundaries based on public input.

10 Q And when you say -- Is this with respect to
11 partisanship --

12 A Yes.

13 Q -- performance?

14 A Yes.

15 Q Partisan performance; is that right?

16 A Yes.

17 Q Okay. And so in your mind the commissioners were
18 negotiating around partisan performance of districts
19 generally, but not actually drawing the district lines; is
20 that correct?

21 A Yes.

22 Q Okay. I want to point you to paragraph three of
23 your email on November 2nd, and you say, "Finally, I want
24 to address this whole question of CVAP, R-performing
25 district in Yakima."

1 Do you see that?

2 A Yes.

3 Q What was the whole -- when you say the whole
4 question of, what are you referring to here?

5 A I don't remember. Yeah.

6 Q What do you interpret the words CVAP R-performing
7 district to mean?

8 A We had been struggling with the House, and
9 especially the Republican commissioners, about the
10 problems with drawing a district that was barely majority
11 minority by CVAP but would perform for Republicans in most
12 cycles.

13 Q Why was that a concern?

14 A Because I think that it would lead to the outcome of
15 the Commission adopting a map that violated federal law.

16 Q And why did you think a map like that that's
17 majority Latino CVAP but R performing would violate
18 federal law?

19 MS. GOLDMAN: Objection, calls for a legal
20 conclusion.

21 A Because it wasn't focused on performance. It was
22 simply focused on numeracy.

23 Q (By Mr. Mulji) I want to -- We'll come back to that
24 in a moment, but I want to draw your attention to the part
25 that you in your email bolded and underlined. It says,

1 "The legal standard set by the federal courts and Congress
2 is not whether a map is comprised of a certain percentage
3 of Latinos" -- and then it continues -- "but whether the
4 district empowers the minority group to elect candidates
5 of their choice."

6 Why did you feel it was important to stress this
7 point in this email on November 2nd?

8 MS. GOLDMAN: Objection to the degree it
9 calls for a legal conclusion.

10 A By this stage of the redistricting cycle I felt that
11 either the commissioner didn't understand that the law
12 required or didn't care, and I wanted to have it on
13 record.

14 Q (By Mr. Mulji) Did you have a concern that
15 Commissioner Walkinshaw would vote for a map that
16 didn't -- for a Legislative District in the Yakima Valley
17 that did not provide Latino voters an opportunity to elect
18 candidates of their choice?

19 A Yes.

20 Q And that was why you communicated this? Was that
21 part of the reason why?

22 A Yes.

23 Q Are you aware of others who shared your concern at
24 this time?

25 A Yes.

1 Q Who were they?

2 A Senate Majority Leader --

3 MR. HUGHES: Sorry. Objection, calls for
4 speculation, lack of foundation.

5 Q (By Mr. Mulji) You can answer.

6 A Senate Majority Leader Andy Billig. The entire
7 staff team.

8 Q Now, you've communicated this to Commissioner
9 Walkinshaw twice -- at least twice at this point; right?

10 MS. GOLDMAN: Objection, vague.

11 Q (By Mr. Mulji) By this I mean the idea that a bare
12 majority is not sufficient if the district doesn't perform
13 to elect Latino candidates of choice.

14 A Yes.

15 Q Are you aware of anybody else raising this issue
16 with Commissioner Walkinshaw?

17 MS. GOLDMAN: Objection, calls for
18 speculation, and lack of foundation.

19 A Yes.

20 Q (By Mr. Mulji) Who else to your understanding
21 communicated this concern to Commissioner Walkinshaw?

22 A The Redistricting Justice Coalition, Senator Billig,
23 Senator Rebecca Saldana.

24 Q What is the Redistricting Justice Coalition?

25 A The Redistricting Justice Coalition is an umbrella

1 organization for a number of a local community-based
2 advocacy organizations in the region. They advocated for
3 a -- what they considered to be a fair map that empowered
4 communities of color in Washington State. They testified
5 at numerous public meetings and met individually with
6 every commissioner who would take a meeting with them.

7 Q And when did -- If you know, when did
8 Senator Saldana communicate these concerns to
9 Commissioner Walkinshaw?

10 MS. GOLDMAN: Objection, calls for
11 speculation, and lack of foundation.

12 Q (By Mr. Mulji) You can answer.

13 A She spoke to him prior to a publications of an op-ed
14 in the Seattle Times advocating for drawing a majority-
15 minority district in the Yakima Valley.

16 Q And when you say majority-minority --

17 A Sorry.

18 Q -- district, --

19 A Opportunity.

20 Q -- are you referring to -- You're referring to not
21 just sort of a bare majority of Latinos. You're referring
22 to sort of an opportunity district that allows Latino
23 candidates to elect candidates of choice?

24 A Yes.

25 Q And how many times to your knowledge did she speak

1 to Commissioner Walkinshaw?

2 MS. GOLDMAN: Objection, calls for
3 speculation, lack of foundation.

4 Q (By Mr. Mulji) You can answer.

5 A I don't know. I know that she wanted to touch base
6 with him before the op-ed was published.

7 Q Do you recall when roughly that op-ed was published?

8 A I don't.

9 Q Okay.

10 A It would have been after the release of the first
11 round of maps.

12 Q And you mentioned Senator Billig in the list of
13 people who had concerns, shared your concerns that you
14 might get a district that looked like it complied but
15 actually didn't; correct?

16 A Yes.

17 Q Did Senator Billig to your knowledge speak to
18 Commissioner Walkinshaw about his concerns?

19 MS. GOLDMAN: Objection, calls for
20 speculation, and lack of foundation.

21 A There were several meetings where legislative
22 leaders met with Commissioner Walkinshaw where staff was
23 present where they would articulate priorities, and one of
24 those priorities was a fair district in the Yakima Valley.

25 Q (By Mr. Mulji) When you say a fair district, do you

1 mean an opportunity district under the federal Voting
2 Rights Act?

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

5 A I don't know what their -- that level of detail was
6 reached in those meetings; but the Redistricting Justice
7 Coalition was quite clear about their position, and the
8 legislators and the Commissioner were very familiar with
9 the Redistricting Justice Coalition's position on the map.

10 Q (By Mr. Mulji) I think we're reaching a break point
11 fairly soon. I think we've gone about another hour, but I
12 have just a few more questions before we do.

13 So I just want to clarify what your understanding
14 was. Did you understand there to be racially polarized
15 voting in the Yakima Valley between Latino voters and
16 White voters?

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

19 MR. HUGHES: And calls for an expert
20 conclusion.

21 A Yes, based on the court determination in the
22 Montes v. Yakima case, as well as the analysis provided by
23 Dr. Barreto to the caucus.

24 Q (By Mr. Mulji) Okay. And we'll talk about
25 Dr. Barreto's analysis in a bit.

1 Did you understand that Latino voters tend to prefer
2 the same candidates in the Yakima Valley region?

3 MR. HUGHES: Objection, vague.

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

6 A Can you reask that question?

7 Q (By Mr. Mulji) Yes.

8 MR. MULJI: Actually, rather than going
9 there now, why don't we actually go on a five-minute break
10 and maybe come back at 11:12 a.m. Is that five minutes
11 from now?

12 (Break 11:07 a.m. to 11:18 a.m.)

13 MR. MULJI: We can go back on the record.

14 Q (By Mr. Mulji) I'm going to move on to talk a little
15 bit about your engagement with Dr. Barreto.

16 A (Nodded.)

17 Q Actually, before I go there, how did the Commission
18 approach VRA compliance?

19 MS. GOLDMAN: Objection, calls for
20 speculation, and lack of foundation.

21 MR. HUGHES: And vague.

22 Q (By Mr. Mulji) You can answer.

23 A The Commission, meaning the Chair, the Executive
24 Director and the four voting members, requested a
25 presentation on both the federal and state VRAs from some

1 combination of the Attorney General's Office, the
2 Secretary of State's Office.

3 I helped the Secretary of State's Office explain
4 that the state Voting Rights Act didn't apply in this
5 circumstance, and the Commission proceeded to schedule a
6 presentation by the Attorney General's Office.

7 Separate from that, at least one commissioner was
8 interested in utilizing the Attorney General's Office for
9 legal -- legal research on compliance with the federal
10 Voting Rights Act.

11 Q Which commissioner was interested in using the
12 Attorney General's Office for legal research and
13 compliance with the federal Voting Rights Act?

14 A I believe it was Commissioner Graves or Fain. I
15 don't remember which.

16 Q Did the Commission rely on the Attorney General's
17 Office for legal search on the federal Voting Rights Act?

18 MS. GOLDMAN: Objection, calls for
19 speculation, and lack of foundation.

20 A Yes.

21 Q (By Mr. Mulji) And do you know why Commissioner Fain
22 and Graves -- Was it -- I'm sorry, was it Fain or Graves?

23 A It was one of them. I don't remember which.

24 Q Okay. Did you have an understanding of why that
25 commissioner was interested in having the AG's office

1 weigh in and provide the legal research on the federal
2 Voting Rights Act?

3 A I don't know their motivation. I do know that once
4 the topic was broached the Democratic commissioners also
5 thought it might be useful.

6 Q Okay. So multiple commissioners were interested in
7 getting a legal -- legal advice from the -- or legal
8 opinion from the Attorney General's Office on federal
9 Voting Rights Act compliance?

10 MS. GOLDMAN: Objection, calls for
11 speculation, and lack of foundation.

12 A Yes. Neither of the Democratic commissioners were
13 attorneys; so I think once they realized that was on the
14 table, that they wanted to get any research they could on
15 an important subject.

16 Q (By Mr. Mulji) And did the Attorney General's Office
17 provide research on the federal Voting Rights Act?

18 MR. HUGHES: Objection, that's
19 attorney-client privilege. I can't instruct you not to
20 answer, but that's clearly privileged.

21 A Yes.

22 Q (By Mr. Mulji) Was the Attorney General's Office
23 your counsel, your attorney on Voting Rights Act
24 compliance?

25 MS. GOLDMAN: Objection, vague.

1 MR. HUGHES: And objection, calls for a
2 legal conclusion. You can answer, but do you mind if we
3 go off the record after this question?

4 A There were a number of conversations around legal
5 representation. What was eventually determined was that
6 the Attorney General's Office was the lawyer for the
7 Commission; and there was an agreement that when a
8 question was posed by one commissioner, that it would be
9 answered and provided to all four.

10 There was at one point a discussion around making
11 those answers public, but I don't remember what the
12 conclusion of those conversations were.

13 Q (By Mr. Mulji) Was the Attorney General's Office
14 counsel for the Senate Democratic Caucus for this purpose?

15 MS. GOLDMAN: Objection, vague.

16 MR. HUGHES: And calls for a legal
17 conclusion.

18 A We didn't talk about it in that fashion, and I
19 wasn't involved in the conversations around the Commission
20 since I wasn't Commission staff. They talked about it in
21 the context of the four commissioners and themselves as a
22 group.

23 I reached out on my own to the Attorney General's
24 Office several times to talk about legal issues, just to
25 get a gut check from them, but that was not in an

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1 attorney-client privilege. That was me checking my math
2 effectively.

3 Q (By Mr. Mulji) Did you understand when you were
4 asking those questions that you had an attorney-client
5 relationship with the Attorney General's Office?

6 A No, I did not believe I had one at the time.

7 Q Okay. And did the Senate Democratic Caucus -- Was
8 it your understanding that the Senate Democratic Caucus
9 had an attorney-client relationship with the Attorney
10 General's Office when it came to redistricting?

11 A I don't believe so. I don't believe that they
12 believed --

13 MR. HUGHES: Objection.

14 MR. MULJI: Okay.

15 MR. HUGHES: Sorry. Let me make my
16 objection. Calls for a legal conclusion.

17 Q (By Mr. Mulji) What questions did you have for the
18 Attorney General's Office regarding VRA compliance?

19 MR. HUGHES: Can I ask you to clarify? Are
20 you talking about the times he reached out on his own or
21 the times in which there was communication --

22 MR. MULJI: Yes.

23 MR. HUGHES: -- on behalf of the
24 commissioner?

25 MR. MULJI: So I'm sorry. Yes, thank you

1 for clarifying.

2 Q (By Mr. Mulji) So when you reached out on your own,
3 when you had an understanding that there was no
4 attorney-client relationship with the Attorney General's
5 Office, what were you reaching out to them about?

6 A We spoke about the nature of the representation and
7 the kind of work they would do for the commissioners when
8 they received these questions. We had a lot of what I
9 would consider to be process-oriented questions where --
10 when we were trying to establish what the office would and
11 would not be providing.

12 This was -- My understanding was this was not
13 something that had been done in the exact same fashion ten
14 years ago. The Attorney General's Office mostly focused
15 on things like the PRA and OPMA at the time.

16 And then I probably had followup questions to emails
17 that they wrote that I was copied on to seek
18 clarification.

19 Q Who did you speak with specifically at the Attorney
20 General's Office in these conversations?

21 A Tera Heintz.

22 Q And --

23 A And at least one other person, whose name is
24 escaping me, who was also assisting with representing the
25 Commission.

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1 Q Was it your understanding that Tera Heintz was
2 representing the Commission in this capacity that you
3 mentioned earlier?

4 A Yes.

5 Q Other than process-oriented questions, did you
6 discuss the substance of the federal Voting Rights Act
7 and its application -- or did you discuss the substance of
8 the federal Voting Rights Act with Tera Heintz in your
9 individual conversations?

10 A Not that I can remember. On a couple of occasions I
11 would be forwarded things that she wrote and asked by Ali
12 O'Neil whether or not this looked right, and I think in
13 every instance I said, "Yes, this is the correct
14 analysis."

15 Q You were generally sort of satisfied with the legal
16 advice provided by the Attorney General's Office on Voting
17 Rights Act compliance?

18 A Yes.

19 Q Did it generally accord with your view of what the
20 Voting Rights Act required?

21 MR. HUGHES: I'm going to object. You're
22 asking about privileged communications between the
23 Attorney General's Office and a client that were forwarded
24 to Mr. Hall in what appears to be a joint interest
25 context. So I don't think there's any waiver here.

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1 I realize that no one is here on behalf of the
2 Commission itself who can instruct the witness not to
3 answer, but I think the question is inappropriate; and I
4 don't think it -- I don't think there's been a waiver
5 here.

6 MR. MULJI: And Mr. Hall has clarified that
7 he was not represented that -- by the Commission, or by
8 the staff for this purpose. He said that the Senate
9 Democratic Caucus does not represent him.

10 MR. HUGHES: Yeah, I'm fine with --

11 MR. MULJI: Those communications were sent
12 to Mr. Hall. That sounds like a waiver.

13 MR. HUGHES: Well, I'm fully aware of what
14 he just testified to, but there is clearly a joint
15 interest issue here.

16 I mean, these communications were forwarded to Adam,
17 to Mr. Hall, for the purpose of acting on or for the
18 purpose of furthering the legal relationship, with
19 presumably an expectation that Mr. Hall wouldn't share
20 those publicly. And clearly Mr. Hall had a joint interest
21 with the commissioners.

22 So I think this clearly falls under the joint
23 interest privilege, and I don't think there's any waiver
24 there. And I think that's it. If you want to take it
25 further, I think we're going to have to involve the Court.

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1 MR. MULJI: Okay. Let me -- That's fine.

2 Q (By Mr. Mulji) You don't have to answer that
3 question. Let me ask a different question.

4 You mentioned that there had been conversations
5 about whether to make the Attorney General's Office's
6 guidance related to the Voting Rights Act public earlier;
7 is that right?

8 A Yes.

9 Q With whom did you have those conversations?

10 A I believe I had one phone conversation with
11 Tera Heintz about how the office would operate. She was
12 very confused about my role and whether or not I was
13 counsel or an attorney for the Commission, so we had a lot
14 of conversations around that.

15 We talked for a while in one of the conversations
16 about that, and it was eventually determined that there
17 was no attorney-client privilege as related to me and the
18 Commission.

19 Q When you say that what do you -- You came to a
20 common understanding of whether communications with you
21 related to redistricting were attorney-client privileged?

22 MS. GOLDMAN: Objection, misstates the
23 testimony.

24 Q (By Mr. Mulji) You can clarify.

25 A No. The conversation that Tera and I had was about

1 whether or not because I had the word counsel in my
2 signature line that I was somehow the attorney for the
3 Commission or any commissioners, and so we had a
4 conversation to clarify that that was, in fact, not the
5 case.

6 Q I see. And specifically regarding publicizing the
7 Attorney General's guidance on the Voting Rights Act
8 provided to the Commission, what were your -- was that --

9 Did you talk about that?

10 A I didn't advise anyone on that question. I think
11 the Commission came up with a decision on their own.

12 Q And what was their decision to the extent you know?

13 MS. GOLDMAN: Objection, calls for
14 speculation, and lack of foundation.

15 A I don't remember.

16 Q (By Mr. Mulji) Okay. That was a long segue into our
17 discussion about Matt Barreto.

18 Who hired Dr. Barreto?

19 A The Senate Democratic Caucus.

20 Q And I think you said earlier that was sometime after
21 the first public release of commissioner proposals in
22 September; is that right?

23 A Yes.

24 Q Why -- Well, and let me say who on the Senate
25 Democratic Caucus team was responsible for coordinating

1 with Dr. Barreto about his work?

2 A I was.

3 Q Okay. And who recommended that Dr. Barreto be
4 hired?

5 A I reached out to Breanne Schuster, who was an
6 attorney for the ACLU on the Montes v. Yakima case, and I
7 asked for recommendations.

8 I actually may have given her two names I found on
9 my own, one being Dr. Barreto, and the other being Bill
10 Cooper who is based out of Virginia but drew the final map
11 that was implemented in Yakima, the City of Yakima. And
12 she confirmed that those were two people that were a good
13 place to start.

14 Q Did she say why those were people who were a good
15 place to start?

16 A I think I articulated sort of my understanding of
17 their participation, and she said no, that -- She said
18 that yes, those were -- That's who she would talk to as
19 well. She didn't have a particularly lengthy response.

20 Q Why did the Senate Democratic Caucus feel it was
21 important to retain Matt Barreto? And I'm sorry. When I
22 say the Senate Democratic Caucus I'm talking about the
23 redistricting team on the Senate Democratic Caucus
24 assisting Commissioner Walkinshaw, if that helps.

25 A Our team had a significant fear that without his

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1 analysis we could be unintentionally supporting a map that
2 discriminated against Latino voters in the Yakima Valley.

3 Q And what were you trying -- What new information
4 were you trying to gain by retaining Dr. Barreto?

5 A We -- When we reached out -- When I reached out I
6 said that there were two things that we sought to
7 understand. The first was whether there was a requirement
8 under federal law for us to draw an opportunity district
9 in the Yakima Valley, and second to conduct an analysis of
10 the four released maps to see whether any complied. If
11 none did, we asked him to propose maps that he felt would
12 comply with the federal Voting Rights Act.

13 Q Was there anything else in his scope of work?

14 MS. GOLDMAN: Objection, vague.

15 A Can you restate the question?

16 Q (By Mr. Mulji) Yes. You've described sort of three
17 things, I guess two or three things, whether there was a
18 requirement to draw an opportunity district, analysis of
19 the released maps, and then any additional maps that he
20 wanted to provide.

21 Were there any other -- What else, if anything, was
22 included in the scope of work from the Senate Democratic
23 Caucus?

24 A We agreed that he would be available to answer
25 questions and provide guidance for the remainder of the

1 redistricting period.

2 Q And did you rely on Dr. Barreto throughout the
3 redistricting process for that kind of guidance?

4 A Yes.

5 Q He was paid?

6 A Yes.

7 Q Did you share map proposals other than the publicly
8 released maps with Dr. Barreto to analyze?

9 A I don't remember. I know that we wanted to focus on
10 the four released maps.

11 Q What was the nature of your question -- After the
12 four released maps you mentioned that you had relied on
13 Dr. Barreto for guidance throughout the process.

14 From that point forward after he released -- Well,
15 actually let me say Dr. Barreto produced a report; is that
16 right?

17 A Yes.

18 Q Okay. Setting the report aside for a moment, in
19 your informal conversations for the guidance that we were
20 just discussing, what kind of things were you asking
21 Dr. Barreto for advice about?

22 A We would generally share with him any insight that
23 we were receiving from the Commissioner negotiations, as
24 well as any map, any full map proposals of Legislative
25 Districts to receive his feedback on the districts in the

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1 Yakima Valley and whether they were likely to perform for
2 Latino voters.

3 Q Okay. And so in order to do that did you have to --
4 did you share materials from the redistricting
5 negotiations with Dr. Barreto?

6 A Yes.

7 Q What kinds of materials?

8 A Emails, maps. There may have been other things, but
9 those were the two primary things we would be sharing with
10 him.

11 Q And you continued to share those kinds of materials
12 with Dr. Barreto throughout the whole redistricting
13 process after he was retained?

14 A Yes.

15 Q How frequently did you talk to Dr. Barreto after he
16 was retained? And when I say talk to, I mean communicate
17 in any form.

18 A We had regular communication throughout the
19 remainder of the process.

20 Q Was part of his scope of work to analyze whether
21 there was racially polarized voting in the region?

22 A Yes.

23 Q Did you discuss how he would conduct that analysis
24 --

25 A Yes.

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1 Q -- with Dr. Barreto?

2 What did you -- What did you understand Dr. Barreto
3 was going to be doing to analyze whether there was
4 racially polarized voting in the Yakima Valley?

5 A The PowerPoint presentation that he shared that we
6 subsequently made public identified both demographic and
7 electoral patterns in the Yakima Valley that would provide
8 evidence that there was a need to draw an opportunity
9 district in the Yakima Valley.

10 Q Did Dr. Barreto look at past elections to determine
11 whether there was racially polarized voting in those
12 elections?

13 MS. GOLDMAN: Objection, calls for
14 speculation, and lack of foundation.

15 Q (By Mr. Mulji) You can answer.

16 A Yes.

17 Q Was there discussion about how many elections he
18 should analyze?

19 A Yes.

20 Q What was the nature of those discussions?

21 A I think he was the one to suggest going back roughly
22 ten years.

23 Q Did he say anything about how many elections he
24 should look into to answer this question?

25 A I don't remember.

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1 MR. MULJI: I want to mark as Exhibit 3 a
2 document labeled D.

3 Ben has placed Exhibit 3 in the chat.

4 MR. BOWEN: Got it. Thank you.

5 (Hall Exhibit No. 3 introduced.)

6 Q (By Mr. Mulji) And Adam, I'll give you a moment to
7 take a look at this email chain.

8 (Pause in proceedings to review document.)

9 Q Have you had a chance to review it?

10 A Yes.

11 Q Okay. Do you recognize this document?

12 A Yes.

13 Q What is it?

14 A It's an email thread between me, Matt Barreto and
15 the Senate Democratic Caucus Chief of Staff Paulette
16 Avalos as we discussed the nature of the -- as we
17 discussed the scope of work that he would perform for the
18 caucus.

19 Q And I want to start by looking specifically at the
20 second email in this chain. Do you see at the bottom of
21 the first page it starts with an email from Matt Barreto
22 to you --

23 A Um-hmm.

24 Q -- on September 28th, 2021. Do you see that?

25 MS. GOLDMAN: At the very bottom?

1 MR. MULJI: At the very bottom of the first
2 page.

3 A So the email that's on the second page, or the
4 email --

5 Q (By Mr. Mulji) I'm sorry. The email that begins on
6 the first -- the bottom of the first page and continues on
7 to the second page. Do you see that one?

8 A Yes.

9 Q Great. Is this the email where Dr. Barreto provides
10 you a write-up of his scope of work?

11 A Yes.

12 Q And it includes an analysis of whether the Latino
13 population is sufficiently large and geographically
14 compact to be in a single numbered district; is that
15 right?

16 A Yes.

17 Q And that's whether the Gingles one standard is
18 satisfied?

19 A Yes.

20 Q And then his analysis also includes sort of an
21 analysis of the voting patterns between Latinos and
22 non-Latinos in the wider region; correct?

23 A Yes.

24 Q And that includes an analysis of the question of
25 Latino -- whether Latino voters are cohesive or not; is

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1 that right?

2 MS. GOLDMAN: Objection. The document
3 speaks for itself.

4 Q (By Mr. Mulji) You can answer.

5 A Yes.

6 Q And whether non-Latino voters in that area block
7 votes against Latinos' voting preferences or not; is that
8 right?

9 MS. GOLDMAN: Counsel, are you simply
10 asking him if that's what the email says?

11 MR. MULJI: Yes.

12 MS. GOLDMAN: Objection, the document
13 speaks for itself.

14 Q (By Mr. Mulji) You can answer.

15 A Yes.

16 Q Is this an accurate account of your understanding of
17 Dr. Barreto's scope of work?

18 A Yes.

19 Q Okay. Is there anything that was in his scope of
20 work that we haven't discussed that's also not included
21 here?

22 MS. GOLDMAN: Objection, vague.

23 Q (By Mr. Mulji) In other words, can you think of
24 anything else that was in his scope of work that we
25 haven't discussed so far?

1 A No.

2 Q Okay. Did you ask Dr. Barreto to start with a
3 presupposition that there is racially polarized voting in
4 the Yakima Valley area?

5 A No.

6 Q You wanted Dr. Barreto to do an objective analysis
7 of whether there is racially polarized voting in the
8 region?

9 A Yes.

10 Q Is it fair to say you were looking for sort of a
11 factual analysis of how the Voting Rights Act might apply
12 in the Yakima Valley area?

13 A Yes.

14 Q What data did you share with Dr. Barreto for him to
15 be able to conduct that factual analysis?

16 A I believe that I pointed him to the Secretary of
17 State's website, which had a number of data files that
18 would be useful for him.

19 And I also put him on an email thread with Matt
20 Bridges because Matt had asked me some questions, and I
21 didn't feel comfortable enough in the minutiae of the data
22 to answer either to Matt Bridges or to Dr. Barreto.

23 Q Okay. Matt Bridges was primarily responsible for
24 gathering the data that Dr. Barreto requested; is that
25 right?

1 A I don't know.

2 Q Okay. And then going back to the question of sort
3 of how many elections Dr. Barreto would analyze to
4 determine whether this is racially polarized voting, I
5 want to turn your attention to the first email in the
6 chain.

7 And I'll just ask you to take a look at that first
8 email, and let me know when you're done.

9 A Okay.

10 Q Does this email refresh your recollection of a
11 discussion about how many elections Dr. Barreto would
12 analyze to determine whether there was racially polarized
13 voting?

14 A Yes.

15 Q And what did he propose?

16 A He recommended five elections at a minimum.

17 Q At a minimum. With a mix of different kinds of
18 elections; correct?

19 A Yes.

20 Q Okay. Is that what Dr. Barreto ended up doing?

21 A I don't remember how many races he actually included
22 in his PowerPoint.

23 Q Okay. We'll actually take a look at that in a
24 moment. You mentioned that he created a report?

25 A Yes.

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1 Q And that was one deliverable. Were there any other
2 sort of concrete deliverables that he was supposed to
3 create as part of the scope of work?

4 A No. The primary published document was the report.
5 Most of the rest of the work he did was just
6 communications and analysis in the email.

7 Q And was the format of the report a slide deck,
8 essentially?

9 A Yes.

10 Q Were there any other formats in which he presented
11 his findings that you can recall?

12 A He walked staff through it, as I recall.

13 Q Okay. And it being just the slide deck?

14 A Yes. I can't remember whether there was an
15 accompanying memo.

16 Q Okay. And when did he deliver the slide deck
17 analysis with you all at the Senate Democratic Caucus?

18 A It was the first or second week of October, I want
19 to say.

20 Q And at that point you all shared that slide deck
21 with the House Democratic Caucus; is that right?

22 A We shared it with them after we received it, yes.

23 Q Okay. And you said that there was a conference call
24 where Dr. Barreto reviewed the results of that analysis?

25 A Yes.

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1 Q Who was present at that conference call?

2 A I don't remember if this was joint with the House,
3 but a presentation to the Senate team, Senate Democratic
4 team would have been Commissioner Walkinshaw, the four
5 staff people, and I just don't remember whether he had a
6 presentation that was with both caucuses and both
7 commissioners.

8 Q I want to -- I want to actually just show you a
9 document. It's labeled H. I'm not going to introduce that
10 as an exhibit.

11 So take a look, and let me know if this -- Well,
12 I'll give you a moment to take a look.

13 A Yep. Okay.

14 Q Have you had a chance to review the document?

15 A Yes.

16 Q Does it refresh your recollection about who was
17 present at the presentation by Dr. Barreto about his
18 report?

19 A Yes.

20 Q In what way?

21 A That there was a presentation to both caucuses.

22 Q Was Commissioner Sims present at that presentation?

23 A Yes.

24 Q And did you discuss Dr. Barreto's report with
25 Commissioner Sims at all?

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1 A Can you restate the question?

2 Q Did you discuss Dr. Barreto's report with
3 Commissioner Sims?

4 A Personally?

5 Q Um-hmm; yes.

6 A I don't think so. I would have participated in the
7 meeting and maybe said one or two things, but the
8 conversation would have primarily been between
9 Dr. Barreto, Commissioner Sims and Commissioner
10 Walkinshaw.

11 Q Did you attend a meeting where Dr. Barreto,
12 Commissioner Walkinshaw and Commissioner Sims were
13 discussing his findings?

14 A Yes.

15 Q When was that meeting?

16 A It would have been the second week of October.

17 Q And that's separate from this presentation?

18 MS. GOLDMAN: Objection as to form.

19 Q (By Mr. Mulji) I guess what I'm wondering is is the
20 meeting that you're talking about where Dr. Barreto and
21 the two commissioners were talking that you attended, is
22 that different from the presentation to the entire Senate
23 Democratic Caucus and House Caucus?

24 A No, I'm talking about the same -- the same --

25 Q The same thing?

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1 A Yeah.

2 Q So you were all at this one presentation in early or
3 mid October --

4 A Yes.

5 Q -- to discuss the findings in his report; is that
6 right?

7 A Yes.

8 Q Commissioner Walkinshaw was there, and Commissioner
9 Sims was there as well; right?

10 A Yes.

11 Q Okay. Why don't we take a quick look at his report,
12 actually.

13 MR. MULJI: So I'm going to mark as
14 Exhibit 4 a document labeled E.

15 MR. HUGHES: Sorry. Is this last email not
16 an exhibit?

17 MR. MULJI: Not an exhibit.

18 MR. HUGHES: Oh, okay.

19 (Hall Exhibit No. 4 introduced.)

20 Q (By Mr. Mulji) Have you seen this document before?

21 A Yes.

22 Q What is it?

23 A It's an email from Ali O'Neil to the Commission
24 Chair and Executive Director providing the full analysis
25 from Dr. Barreto.

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1 Q And it's from -- sorry -- Ali O'Neil to Sarah
2 Augustine and Lisa McLean; correct?

3 A Yes.

4 Q And it cc's Tera Heintz and Emma Grunberg from the
5 Attorney General's Office as well as Brady Walkinshaw and
6 you; correct?

7 A Yes.

8 Q And attached to this email is the full slide deck
9 report of Dr. Barreto; is that right?

10 A Yes.

11 Q Okay. I'm going to mark that as Exhibit 5.

12 A Thank you.

13 (Hall Exhibit No. 5 introduced.)

14 Q And I guess before you -- Well, have you seen this
15 document before?

16 A Yes.

17 Q I'll give you a moment to flip through it. Let me
18 know when you're done.

19 (Pause in proceedings to review document.)

20 Q Okay. You've had a chance to review this document?

21 A Yes.

22 Q Is this the full version of Dr. Barreto's report
23 that he produced?

24 A Yes.

25 Q Okay. There was also a public version of the

1 report; correct?

2 A Yes.

3 Q How was that report different from this one?

4 A I think we took out some of the data slides because
5 we felt they were redundant.

6 Q Is it fair to say the public report was sort of an
7 abridged version of this full report?

8 A Yes.

9 Q Okay. And turning back to Exhibit 1, --

10 MS. GOLDMAN: One?

11 MR. MULJI: I'm sorry, not one. Four.

12 MS. GOLDMAN: Four?

13 MR. MULJI: Exhibit 4, the email here.

14 Q (By Mr. Mulji) This is the email where Ali O'Neil
15 shares this full report with the Commission staff;
16 correct?

17 A Um-hmm. Sorry. Yes.

18 Q And with the purpose of circulating it to all the
19 commissioners and the staff; correct?

20 A Yes.

21 Q Okay. Do you know if the report was circulated to
22 the commissioners and staff?

23 MS. GOLDMAN: Objection, calls for
24 speculation, and lack of foundation.

25 Q (By Mr. Mulji) You can answer.

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1 A I don't know.

2 Q Okay. Do you know whether it was posted publicly --
3 whether it was publicly --

4 This email says to post it publicly as well;
5 correct?

6 A Yes.

7 Q Do you know if that happened?

8 A I don't remember.

9 Q Okay. All right. So just turning back to the
10 report that's Exhibit 5, did you read this full report?

11 A When?

12 Q I guess at any point.

13 A Yes.

14 Q Okay. And at any point in time did you feel pretty
15 comfortable with its contents?

16 MS. GOLDMAN: Objection as to form.

17 Q (By Mr. Mulji) You can answer.

18 A Yes.

19 Q When you reviewed the report for the first or, I
20 guess, during this time what were your take-aways and
21 impressions?

22 MS. GOLDMAN: Objection, compound.

23 Q (By Mr. Mulji) You can answer.

24 A My belief was that Dr. Barreto had found both the
25 need to draw a majority-minority district in the Yakima --

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1 or excuse me, to draw an opportunity district in the
2 Yakima Valley, and that none of the four public proposals
3 released in September did so.

4 Q Did you think the analysis was reliable?

5 MS. GOLDMAN: Objection, calls for a legal
6 conclusion.

7 Q (By Mr. Mulji) You can answer.

8 A Yes.

9 Q Dr. Barreto's report includes an analysis of
10 racially polarized voting; correct?

11 A Yes.

12 Q Is it your understanding that this analysis also
13 identified which candidates were preferred by Latino
14 voters in previous races?

15 A Yes.

16 Q And I just -- Since we were discussing this a little
17 earlier, I counted 12 races that he analyzed in this
18 report. You can take a look, but is that -- Does that
19 look right? Does that sound right to you?

20 Is that correct that he analyzed 12 races to
21 determine whether there was racially polarized voting?

22 MS. GOLDMAN: Objection, the document
23 speaks for itself.

24 A Yes, that sounds right.

25 Q (By Mr. Mulji) Okay. How did you -- How did the

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1 Senate Democratic Caucus use this analysis in drafting map
2 proposals? And actually, let me ask the question more
3 specifically.

4 How did the Senate Democratic Caucus use this
5 analysis to draw Legislative Districts in the Yakima
6 Valley?

7 A With this information and the CVAP data that had
8 been uploaded to Dave's Redistricting App, the team was
9 then able to begin generating maps that it -- that we felt
10 were both compliant with the federal Voting Rights Act
11 while remaining consistent with the public testimony we
12 had received from stakeholders and local organizers about
13 the 14th and 15th Legislative Districts.

14 Q Did it help you figure out whether the districts you
15 were drawing would elect Latino candidates of choice?

16 A Yes.

17 Q How?

18 A Can you ask that question just one more time?

19 Q Yeah. How did the report help you in determining
20 whether the districts you were drawing or evaluating would
21 likely elect Latino candidates of choice?

22 A I think the report reflected both whether or not we
23 had a responsibility to draw a certain district, but it
24 also gave us a stronger grounding in terms of where we
25 could draw it.

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1 So, for example, the last two draft maps included in
2 the presentation were drawn by Dr. Barreto, and they were
3 drawn in such a fashion that I think it helped Matt
4 Bridges rethink how to draw a district that was both
5 compliant and consistent with public testimony.

6 Q I want to turn to page 15 of the report. Do you see
7 the second slide on page 15 includes an analysis of Latino
8 and White voting patterns in the Trump v. Biden 2020
9 general election; is that right? Or I guess it doesn't
10 say whether it's the general, but the Trump v. Biden race
11 in 2020; correct?

12 A Yes.

13 Q Does this give you information about which of those
14 two candidates was the Latino candidate of choice in that
15 election?

16 A Yes.

17 Q This is just one of several slides analyzing
18 different races in Washington state; correct?

19 A Yes.

20 Q Did you glean from this report that in each of these
21 races which candidate was the Latino preferred candidate?

22 A Yes.

23 Q And did you use that information, or did the Senate
24 Democratic Caucus use that information in evaluating
25 potential districts in the Yakima Valley and to see

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1 whether they would actually elect those candidates -- that
2 they would have elected those candidates?

3 A Yes.

4 MR. HUGHES: Objection, leading.

5 Q (By Mr. Mulji) How did you -- How did the Senate
6 Democratic Caucus do that?

7 A I wasn't responsible for map drawing, so that was
8 not something that I spent a lot of time doing.

9 I think I just focused on the fact that these races
10 were consistently doing the same thing, so that what my
11 role was was to talk to others, especially on the House
12 team, about the strength of the presentation.

13 Q When you say what these races were doing, can you
14 clarify what you meant?

15 A Sorry. The different elections that were presented.
16 The fact that they were all -- that these lines all look
17 the same, I think it gave -- It gave our team a lot of
18 confidence in the work.

19 Q It gave your team a lot of confidence in what
20 exactly?

21 A In drawing districts that would perform for Latinos
22 and that this would be compliant with the Federal Act.

23 Q Did you believe that Matt Barreto was qualified for
24 the work he did?

25 A Yes.

1 Q Did you find him credible?

2 A Yes.

3 Q Did you find his advice reliable?

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

6 Q (By Mr. Mulji) You can answer.

7 A Yes.

8 Q And did you -- Did you understand that the analysis
9 presented by Matt Barreto to be consistent with best
10 practices in this type of analysis?

11 MS. GOLDMAN: Objection, calls for a legal
12 conclusion and an expert opinion.

13 MR. HUGHES: Thanks.

14 Q (By Mr. Mulji) You can answer.

15 A Yes.

16 Q What was the basis of that belief?

17 A Prior to the Senate Democratic Caucus hiring
18 Dr. Barreto we understood that he had played a pretty
19 critical role in analyzing election results in 2012 in the
20 race for State Supreme Court Justice in the election of
21 Steve Gonzalez. That race attracted a lot of attention
22 statewide.

23 And the fact that he had also been involved in the
24 lawsuit in Montes v. Yakima gave our team a lot of
25 confidence not only in his ability, but in the fact that

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1 other people in the broader redistricting process were
2 familiar with his work.

3 Q Do you recall what the Court in the Montes v. Yakima
4 case found about whether there was racially polarized
5 voting in the region?

6 A The Court found racially polarized voting.

7 Q Apart from the broader presentation to the caucus
8 staff that we'll talk about in a second, did you discuss
9 this report specifically with Commissioner Walkinshaw?

10 A Yes.

11 Q When was that conversation?

12 A It likely would have been on a team meeting. I
13 don't know what date.

14 Q Did he ask any questions about the report during
15 that meeting?

16 A I don't remember.

17 Q What do you remember about that discussion?

18 A In meetings that I had with him prior to this
19 presentation and meetings afterwards he gave the
20 impression that this was something that was important to
21 him.

22 Q Do you recall whether he said why it was important
23 to him?

24 A Publicly he said that it was important to him as a
25 Latino man serving on the Commission. Privately I think

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1 he was less vociferous in his support.

2 Q Did you discuss whether he found the analysis by
3 Dr. Barreto reliable?

4 A I never asked him that question.

5 Q Did he give you the impression that he found the
6 analysis reliable?

7 MS. GOLDMAN: Objection, calls for
8 speculation, and lack of foundation.

9 Q (By Mr. Mulji) You can answer.

10 A I don't think he gave it that much thought.

11 Q Did other members of the Senate Democratic Caucus
12 team believe that Dr. Barreto's analysis was reliable?

13 MS. GOLDMAN: Objection, calls for
14 speculation, and lack of foundation.

15 Q (By Mr. Mulji) You can answer.

16 A Yes.

17 Q How do you know that?

18 A Because it became a priority for our team to include
19 this in the final adopted version of the map.

20 Q When you say include this in the final adopted
21 version of the map, do you mean to use the analysis to
22 draw a compliant map; is that what you mean?

23 A Yes.

24 Q Okay. Who else was Dr. Barreto's report shared
25 with?

1 MS. GOLDMAN: Objection, calls for
2 speculation, and lack of foundation.

3 Q (By Mr. Mulji) You can answer.

4 A The report was shared with a number of key
5 legislators, and it was also made public in an article
6 published on the Crosscut news website.

7 Q Did you share the report with any other
8 commissioners?

9 MR. HUGHES: Can I just clarify? I believe
10 there's been testimony about two different versions of
11 this report, so which report -- In these questions which
12 report are you asking about?

13 MR. MULJI: Either the full report that
14 we're looking at now or the abridged public version.

15 Q (By Mr. Mulji) Did you share either of these with
16 the Republican commissioners?

17 A Did I share it with them?

18 Q Um-hmm.

19 A No.

20 Q Do you know whether either of them were shared
21 directly with them?

22 MS. GOLDMAN: Objection, calls for
23 speculation, and lack of foundation.

24 A I don't.

25 Q (By Mr. Mulji) Okay. Okay. So now I'm going to ask

1 you about the presentation that he made to the Senate
2 Democratic Caucus.

3 Do you recall Commissioner Sims asking any questions
4 of Dr. Barreto during that presentation?

5 A I believe she did. I don't remember their
6 substance.

7 Q What do you remember about -- about what
8 Commissioner Sims's position -- or what do you remember
9 about what Commissioner Sims said during that
10 presentation?

11 MS. GOLDMAN: Objection, asked and
12 answered.

13 Q (By Mr. Mulji) You can answer.

14 A It was either in that meeting or a followup meeting
15 where she agreed to publish a new map that would comply
16 with the VRA, given the analysis that was included here.

17 Q And are you referring to the second public map
18 proposal that Commissioner Sims put out?

19 A Yes.

20 Q Is it your understanding that that was --
21 Go ahead.

22 A Okay.

23 Q Is it your understanding that that second public
24 proposal by Commissioner Sims was informed by
25 Dr. Barreto's analysis?

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1 A Yes.

2 Q What's the -- How do you know that?

3 A Our team met with the House team, and I know that
4 the two commissioners spoke about releasing new maps that
5 were -- that were demonstratively compliant with the
6 federal VRA.

7 I believe both of the Democratic proposals that were
8 released on September 21st either weren't compliant or
9 were compliant but just barely.

10 Q Is there anything else you remember about that --

11 Is there anything else that sticks out in your mind
12 about that conference call with Dr. Barreto?

13 A No.

14 Q Did you share Dr. Barreto's report with Tera Heintz?

15 MR. HUGHES: I'm going to object. That's
16 calling -- This question again I think calls for
17 attorney-client privileged material potentially.

18 MR. MULJI: Okay. I want to mark as
19 Exhibit 6 a document labeled I.

20 (Hall Exhibit No. 6 introduced.)

21 Q (By Mr. Mulji) I'm giving you a moment to take a
22 look at this while we get it shared in the chat.

23 A Yes. Okay.

24 Q Okay. You've had a chance to review it?

25 A Um-hmm.

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1 Q Have you seen this document before?

2 A Yes.

3 Q What is it?

4 A This is an email from Ali O'Neil to Commissioner
5 Walkinshaw about a lengthy review done by the Attorney
6 General's Office for the commissioners on the requirements
7 of the federal Voting Rights Act.

8 Q And that email from Ali to Brady is on October 28th;
9 correct?

10 A Yes.

11 Q And just generally speaking, this was where it
12 seemed she was talking to Commissioner Walkinshaw about
13 sharing the full report with the Commission and the
14 commissioners; correct?

15 MS. GOLDMAN: Objection, misstates the
16 document.

17 Q (By Mr. Mulji) Is that an accurate --

18 A Yeah, this email --

19 Q -- summary of this document?

20 A -- talks about sending it to the AAG for the
21 Commission.

22 Q Oh, I see. Yeah. So that -- Okay. I see. So this
23 was -- Okay.

24 Why -- It says -- The first line says, "Adam" --

25 "Brady, just to follow up on this, Adam" -- and I

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1 assume she meant to say, "Adam and I have been talking
2 about one specific piece of the assessment." [as read]

3 And then she goes on to recommend sharing the full
4 analysis with the AG's office; is that right?

5 A Yes.

6 Q There's some redacted material in between?

7 A Yes.

8 Q Without going into the specifics of the redacted
9 material, generally speaking what was your conversation
10 with Ali? What happened during the conversation that
11 she's referring to here between you and Ali?

12 MR. HUGHES: I'm going to object to the
13 extent the question calls for any discussion of the actual
14 advice and would ask that Mr. Hall not disclose any
15 conversations about the actual advice.

16 MS. GOLDMAN: I'm going to join in that
17 objection.

18 Q (By Mr. Mulji) To the extent you can answer, --

19 MS. GOLDMAN: I'm going to instruct the
20 witness not to answer.

21 Q (By Mr. Mulji) If you go down to the bottom of the
22 first page and the last sentence, there's a second email
23 by Ali O'Neil to Brady Walkinshaw; correct?

24 A Yes.

25 Q And that was on October 28th?

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1 A Yes.

2 Q You're not cc'd on that email, but I'm wondering
3 have you seen this email before? I guess you have. You
4 were on the top email.

5 Do you recall seeing this email before?

6 A Yes.

7 Q The first line says -- of the last paragraph of
8 Ali O'Neil's email says, "Looks like it largely finds that
9 if the Barreto analysis is correct, there is sufficient
10 legal need for a VRA district."

11 Did you discuss -- Did you discuss what Ali O'Neil
12 meant by that?

13 MR. HUGHES: I'm going to object --

14 MS. GOLDMAN: Go ahead.

15 MR. HUGHES: I'm going to object to the
16 extent it calls for attorney-client privileged material.
17 To the extent there's any discussion of the actual advice
18 that was provided by my office, the Attorney General's
19 Office, I'd request that Mr. Hall not discuss that.

20 MS. GOLDMAN: So subject to you disagreeing
21 with me, Andrew, I would like to instruct the witness to
22 answer in a yes or no fashion to the question that was
23 posed, whether there was a conversation.

24 MR. HUGHES: Fine. Thank you.

25 MS. GOLDMAN: Okay. Do you recall the

1 question?

2 THE WITNESS: No.

3 MS. GOLDMAN: Can you please read the
4 question back?

5 THE REPORTER: Sure.

6 MS. GOLDMAN: And my instruction to you,
7 just so that there's no interruption, is going to be that
8 you answer the question to the degree you know it, either
9 yes or no, and say nothing further.

10 THE REPORTER: "Did you discuss what Ali
11 O'Neil meant by that?"

12 MS. GOLDMAN: Could you go back to the
13 prior question?

14 THE REPORTER: Sure.

15 MS. GOLDMAN: Thank you.

16 THE REPORTER: "If the Barreto analysis is
17 correct, there is sufficient legal need for a VRA
18 district. Did you discuss what Ali O'Neil meant by that?"

19 A Yes.

20 Q (By Mr. Mulji) When did you have that discussion?

21 A It would have been that day, Thursday, October 28th.

22 Q Okay. And after October 28th did your views on
23 whether the federal Voting Rights Act requires an
24 opportunity district in the Yakima Valley change?

25 MS. GOLDMAN: Objection to the degree it

1 calls for a legal conclusion.

2 MR. HUGHES: I'm also going to object --
3 and maybe this is surplus. I do apologize -- to the
4 extent that it calls for attorney-client privilege. To
5 the extent that your view might have shifted based on any
6 advice that you or the Commission received from the
7 Attorney General's Office, I would request that you not go
8 into that.

9 MS. GOLDMAN: And I will instruct you not
10 to answer to the degree it does.

11 MR. MULJI: I'm going to note that I'm
12 asking a yes or no question not related to -- He doesn't
13 have to discuss any of the content of the communications.
14 This is a yes or no question.

15 MS. GOLDMAN: Could you either ask the
16 question again, or could I have it read back?

17 MR. MULJI: Let me ask the question again.

18 MS. GOLDMAN: Okay. Thank you.

19 Q (By Mr. Mulji) From October 27th to October 29th did
20 your views on whether the Voting Rights Act requires an
21 opportunity district, a Latino opportunity district in the
22 Yakima Valley change?

23 A No.

24 Q Okay.

25 MR. MULJI: I'm going to mark as Exhibit --

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1 Where are we at?

2 THE REPORTER: Seven.

3 MR. MULJI: Seven. I'll mark as Exhibit 7
4 a document labeled -- Actually, before we go there -- I'm
5 sorry. Can we just not mark the exhibit right now.

6 I think we might be at a good stopping point for
7 lunch, unless -- Well, actually, if folks are okay going
8 for ten minutes, I think I can do this in ten minutes,
9 maybe stop at 12:30.

10 Does that work for folks?

11 THE WITNESS: My only question is whether
12 the food is here already.

13 MS. GOLDMAN: I don't think so.

14 THE WITNESS: Then let's keep going then.

15 MS. GOLDMAN: Yes.

16 MR. MULJI: Okay.

17 MR. BOWEN: Aseem, real quick, how many --
18 How much longer do you think you have, just ball-parking?

19 MR. MULJI: Ballpark after lunch I would
20 say a couple hours.

21 MR. BOWEN: Okay. I have about 30 minutes
22 at the end. I just want to make sure there's time.

23 MR. MULJI: There should definitely be
24 time.

25 MR. BOWEN: Okay. Perfect. Thank you.

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1 MR. MULJI: Okay. In that case, to muck up
2 the record I will go ahead and introduce this exhibit.
3 That's Exhibit 7, and that's the document labeled I.

4 MR. PHILLIPS: That was six.

5 THE REPORTER: Yes, that was six.

6 MR. MULJI: I'm sorry. J, the document
7 labeled J will be Exhibit 7.

8 (Hall Exhibit No. 7 introduced.)

9 (Pause in proceedings to review document.)

10 Q (By Mr. Mulji) Do you recognize this document?

11 A Yes.

12 Q I'm not going to ask you to read it all again,
13 unless you would like that time. I don't have specific
14 questions for you about the content, but I --

15 My first question for you about it is whether you've
16 reviewed this document before in detail.

17 A Yes.

18 Q What is it?

19 A It's a memo prepared for the two Republican
20 commissioners arguing effectively the opposite of what
21 Dr. Barreto put forward the previous month.

22 Q Is it fair to say this is a response to
23 Dr. Barreto's report?

24 A Yes.

25 Q Did you review it closely?

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1 A Yes.

2 Q Do you recall what you thought about it at the time,
3 generally?

4 A I didn't have a high opinion of it; and then I
5 called a couple of folks who provided sort of additional
6 thoughts, and I thought even less of it afterward.

7 Q Who were those folks?

8 A Abha Khanna at the Elias Law Group, Yuriy Rudensky
9 at the Brennan Center, and Dr. Barreto.

10 Q What was your take-away from those conversations
11 about the analysis provided in this memorandum?

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

14 Q (By Mr. Mulji) You can answer.

15 A That this was wrong.

16 Q Did it change your understanding of what the federal
17 Voting Rights Act requires?

18 A No.

19 Q Did it add anything to your understanding of what
20 the federal Voting Rights Act requires?

21 A No.

22 Q And to the extent you remember, what about -- what
23 about this memorandum is wrong?

24 MS. GOLDMAN: Objection to the degree it
25 calls for a legal conclusion, calls for speculation.

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1 Q (By Mr. Mulji) You can answer.

2 MS. GOLDMAN: If you want that answer, he's
3 got to read the whole thing.

4 Q (By Mr. Mulji) Did you at any point in time share
5 your feedback with -- well, anyone -- about this memo?

6 A Yes.

7 Q Okay. Let me ask you do you know the attorneys who
8 wrote this memo?

9 A No.

10 Q What do you know about the attorneys who wrote this
11 memo, if anything?

12 A That they're not Voting Rights Act experts.

13 Q Did you look into the expertise of the attorneys who
14 wrote this memo?

15 A Yes.

16 Q What did you find about -- Like what do they do?

17 MR. BOWEN: Objection, calls for
18 speculation.

19 A If you look at their CVs on their firm website it
20 shows that they have not litigated any Voting Rights Act
21 cases in the past, and they actually intervened or were
22 counsel to parties in several partisan lawsuits, including
23 Gregoire v. Rossi.

24 Q (By Mr. Mulji) What did that lawsuit concern?

25 A It was the 2004 gubernatorial race was decided by a

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1 very small number of votes, and so there was a lawsuit
2 involving the Republic candidate, the Democratic candidate
3 and the state parties.

4 Yeah, and eventually it resulted in the resolution
5 of Christine Gregoire being elected governor.

6 Q Did you view this memo as being an objective
7 analysis?

8 A No.

9 Q Why not?

10 A It felt like something that the Republican
11 commissioners asked for this firm to do for them.

12 Q When you say that it felt like the Republican
13 commissioners asked them to do this for them, do you mean
14 that -- Well, do you mean that they were seeking legal
15 cover for the position that they held, or --

16 A Yes.

17 Q -- what do you mean by that?

18 MR. HUGHES: Objection, calls for
19 speculation.

20 MR. BOWEN: Objection, calls for
21 speculation.

22 MR. HUGHES: Lack of foundation.

23 Q (By Mr. Mulji) Sorry. Was that a yes?

24 A Yes.

25 Q Based on what you recall about this memorandum, did

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1 it apply the federal Voting Rights Act to the facts in the
2 Yakima Valley?

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

5 A I'd have to read it --

6 Q (By Mr. Mulji) Okay.

7 A -- start to finish to answer that.

8 MR. MULJI: Let me mark as Exhibit 8 a
9 document labeled K.

10 THE WITNESS: Thank you.

11 (Hall Exhibit No. 8 introduced.)

12 Q Do you recognize this document?

13 A Yes.

14 Q What is it?

15 A It was -- I believe the attachment was some talking
16 points to rebut the memo that had been circulated by the
17 lawyers at Davis Wright Tremaine.

18 MR. MULJI: Okay. And I'm going to mark as
19 Exhibit 10 -- No, --

20 MS. GOLDMAN: Nine.

21 MR. MULJI: -- nine a document labeled K.
22 I'll just represent to you that's the attachment to this
23 email.

24 THE WITNESS: Thank you.

25 (Hall Exhibit No. 9 introduced.)

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1 MR. MULJI: And I'm sorry, this is
2 Exhibit 10?

3 THE REPORTER: Nine.

4 MR. MULJI: Nine.

5 Q (By Mr. Mulji) Is Exhibit 9 the attachment to
6 Exhibit 8?

7 A Yes.

8 Q Does this exhibit encapsulate sort of your thoughts
9 at the time about the Davis Wright Tremaine memo?

10 A Yes.

11 Q Did you share this document with -- Well, it looks
12 like in this email you shared it with Paulette Avalos,
13 Ali O'Neil, Adam Bartz and Matt Bridges; correct?

14 A Yes.

15 Q Did you share this document with anyone else?

16 A I -- I don't remember.

17 Q Did you talk about the Davis Wright Tremaine memo
18 with Commissioner Walkinshaw?

19 A I don't know if I spoke to him directly about it.

20 Q Did you communicate the substance of these talking
21 points with him in any way?

22 A As a general principle anything I sent to Ali would
23 usually reach him in some form.

24 Q Okay. Did you communicate your thoughts about the
25 Davis Wright Tremaine memo to anyone else we haven't

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1 discussed so far?

2 A Yes.

3 Q Who else?

4 A The members of the Senate Democratic Caucus who were
5 involved in redistricting. We had semi regular check-ins
6 with them, and so this probably came up in one of those
7 calls.

8 Q And you're referring to legislators who were part of
9 the Democratic Caucus?

10 A Yes.

11 Q Okay. Which legislators?

12 A State Senators Billig, Pedersen and Saldana were the
13 most closely involved with redistricting, so I probably
14 shared it with them.

15 Q Based on your understanding of the federal Voting
16 Rights Act and Dr. Barreto's analysis, did you believe
17 that the candidates of choice of Latino voters is
18 different from the candidates preferred by White voters in
19 the Yakima Valley?

20 MS. GOLDMAN: Objection to the degree it
21 calls for a legal conclusion.

22 Q (By Mr. Mulji) You can answer.

23 MS. GOLDMAN: And calls for speculation,
24 and lack of foundation.

25 A Can you reask the question?

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1 Q (By Mr. Mulji) Yes. Based on Dr. Barreto's analysis
2 and any other -- any other sources of information that you
3 used to come to your understanding of the Voting Rights
4 Act, did you believe that candidates of choice of Latino
5 voters are different from those of White voters?

6 MS. GOLDMAN: Same objections.

7 A Yes.

8 Q (By Mr. Mulji) And did you believe that White voters
9 regularly overwhelm the choices of Latino voters in the
10 region?

11 MS. GOLDMAN: Objection, calls for
12 speculation, and lack of foundation.

13 MR. HUGHES: And calls for a legal expert,
14 too.

15 A Yes.

16 Q (By Mr. Mulji) Was that also based on your review of
17 Dr. Barreto's analysis?

18 MS. GOLDMAN: Objection, calls for a legal
19 conclusion.

20 A Yes.

21 Q (By Mr. Mulji) Was that based on your review of
22 prior court cases --

23 MS. GOLDMAN: Objection.

24 Q (By Mr. Mulji) -- in the region?

25 MS. GOLDMAN: Objection, calls for a legal

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1 conclusion.

2 A Yes.

3 Q (By Mr. Mulji) Was it based on anything else?

4 A Regular conversations with national experts and
5 other lawyers I know who worked on cases prior.

6 Q National experts on voting rights and redistricting?

7 A Yes.

8 Q And based on those things you understood that the
9 Voting Rights Act required a Latino opportunity district
10 in the Yakima Valley; correct?

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

13 A Yes.

14 Q (By Mr. Mulji) Now, did you -- How did you know that
15 a Latino opportunity district could be drawn in the Yakima
16 Valley at all?

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

19 A Can you ask that a different way?

20 Q (By Mr. Mulji) Yes. Well, did you believe it was
21 possible that you could draw a Latino opportunity district
22 in the Yakima Valley?

23 MS. GOLDMAN: Objection, calls for a legal
24 conclusion.

25 A Yes.

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1 Q (By Mr. Mulji) And how did you know that?

2 MS. GOLDMAN: Objection, calls for a legal
3 conclusion.

4 A Some combination of the research done by
5 Dr. Barreto, the lawsuits that had transpired in the
6 Yakima region over the past ten years, as well as the
7 tools we had available to us in Dave's Redistricting App.

8 Q (By Mr. Mulji) Did you see maps proposed that you
9 believed would give Latino voters an equal opportunity to
10 elect their candidates of choice?

11 MS. GOLDMAN: Objection to the degree it
12 calls for a legal conclusion.

13 A Yes.

14 Q (By Mr. Mulji) How many maps did you see throughout
15 the process, approximately, that you thought would satisfy
16 the federal Voting Rights Act in the region?

17 MS. GOLDMAN: Objection to the degree it
18 calls for a legal conclusion.

19 A A number of them.

20 Q (By Mr. Mulji) Is it fair to say you saw -- I don't
21 know if you said maps. Maybe that was imprecise --
22 configurations of the 14th or 15th District in the Yakima
23 Valley. Were there more than one configuration --
24 Were there more than one way to draw the Legislative
25 Districts 14 and 15 that complies in your view with the

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1 federal Voting Rights Act?

2 A Yes.

3 MS. GOLDMAN: Objection, calls for a legal
4 conclusion.

5 Q (By Mr. Mulji) And those configurations of
6 Legislative District 14 and 15 were known to -- well,
7 known to you. You knew about those.

8 Did you see those configurations during the
9 redistricting process?

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

12 MR. HUGHES: And compound.

13 Q (By Mr. Mulji) Let me ask the question again for a
14 clear record.

15 You saw multiple configurations of the 14th and 15th
16 District that would comply with the Voting Rights Act as
17 you interpreted it, --

18 MS. GOLDMAN: Objection.

19 Q (By Mr. Mulji) -- that law; correct?

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

22 A Yes.

23 Q (By Mr. Mulji) And were those maps also presented to
24 the commissioners in some form?

25 MS. GOLDMAN: Objection, calls for

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1 speculation, lack of foundation.

2 A Yes.

3 Q (By Mr. Mulji) Were those maps called to the
4 attention of Commissioner Walkinshaw?

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

7 A Yes.

8 Q (By Mr. Mulji) Were those maps called to the
9 attention of Commissioner Sims?

10 MS. GOLDMAN: Objection, calls for
11 speculation, and lack of foundation.

12 A Yes.

13 Q (By Mr. Mulji) Were those maps called to the
14 attention of Commissioner Fain, to the extent you know?

15 MS. GOLDMAN: Objection, calls for
16 speculation, and lack of foundation.

17 A Yes.

18 Q (By Mr. Mulji) And what about Commissioner Graves?

19 MS. GOLDMAN: Same objections.

20 A Yes.

21 Q (By Mr. Mulji) There was some discussion during the
22 redistricting process about the Yakama Nation as well;
23 correct?

24 A Yes.

25 Q Could an opportunity district be drawn that performs

1 to elect Latino candidates of choice without splitting the
2 Yakama Nation?

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

5 MR. HUGHES: Also lack of foundation.

6 MR. MULJI: Well, let me back up then.

7 Q (By Mr. Mulji) Tell me about what -- Tell me about
8 how the Yakama Nation figured into your conversations
9 about Legislative Districts in the Yakima Valley.

10 A We received public feedback from stakeholder groups
11 and community members in the Yakima Valley, and the
12 overwhelming preference that was communicated in public
13 meetings was that commissioners draw -- adopt a map that
14 both kept the people living on the Yakama Reservation
15 whole in one district, and also that they would like to be
16 in the same district as Latino voters in the Yakima
17 Valley.

18 Q And did the Senate Democratic Caucus team try to
19 draw maps that kept the Yakama Nation whole?

20 A Yes.

21 Q Did the maps that the Senate Democratic Caucus drew
22 that kept the Yakama Nation whole, do you believe there
23 were maps that the Senate Democratic Caucus drew that also
24 performed to elect Latino candidates of choice?

25 MS. GOLDMAN: Objection, vague, and --

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1 Q (By Mr. Mulji) Was the --

2 MS. GOLDMAN: -- calls for a legal
3 conclusion.

4 Q (By Mr. Mulji) I'll rephrase. Was the Senate
5 Democratic Caucus able to meet both of those goals? In
6 other words, was it able to draw a district that kept the
7 Yakama Nation Reservation whole while also performing to
8 elect Latino candidates of choice?

9 MS. GOLDMAN: Objection to the degree it
10 calls for a legal conclusion.

11 A Yes.

12 Q (By Mr. Mulji) And were these maps proposed to any
13 other commissioners?

14 MS. GOLDMAN: Objection, calls for
15 speculation, and lack of foundation.

16 A Yes.

17 Q (By Mr. Mulji) How many -- I guess can you tell me
18 more about those proposals?

19 A Commissioner Walkinshaw shared a proposed
20 legislative map with Commissioner Fain in the last I'd say
21 ten days of the process; and it included what our team
22 felt like was a compliant map as it relates to the federal
23 Voting Rights Act, and it was dismissed out of hand.

24 Q When did Commissioner Walkinshaw make that proposal?

25 A Sometime around the tail end of the first week of

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1 November, maybe.

2 Q Okay. And were there any -- Were there any maps,
3 any configurations of the 14th or 15 Legislative District
4 proposed by Latino community members in the Yakima Valley
5 that you recall?

6 A Yes.

7 MS. GOLDMAN: And Counsel, it's 12:40, so
8 I'm thinking lunch would be a good time, as --

9 MR. MULJI: That's a great idea.

10 MS. GOLDMAN: -- soon as it's convenient.

11 MR. MULJI: Yes.

12 Q (By Mr. Mulji) And were those maps -- Well, in your
13 view did those districts afford Latino community members
14 an opportunity to elect candidates of their choice?

15 MS. GOLDMAN: Objection, vague, and calls
16 for a legal conclusion.

17 MR. HUGHES: And compound.

18 A Can you restate?

19 Q (By Mr. Mulji) Yes. The map proposals you received
20 from Latino community members, in your view did they
21 comply with the federal Voting Rights Act?

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

24 MR. HUGHES: And compound.

25 A Yes.

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1 Q (By Mr. Mulji) Did the Senate Democratic Caucus
2 staff conduct analyses of those maps to determine whether
3 they would elect Latino candidates of choice?

4 A Yes.

5 MR. HUGHES: Objection, compound.

6 Q (By Mr. Mulji) And did you find that those maps,
7 generally speaking, did elect Latino candidates of choice?

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

10 MR. HUGHES: And compound.

11 A Yes.

12 Q (By Mr. Mulji) All of the maps you received from
13 Latino community members --

14 Well, scratch that.

15 MR. HUGHES: Lunchtime?

16 MR. MULJI: Lunchtime, yes.

17 (Discussion off the record.)

18 (Break 12:42 p.m. to 1:34 p.m.)

19 Q (By Mr. Mulji) So I want to actually start us off
20 by sharing my screen to show you a map, and I'm going to
21 try to focus right now on --

22 Are you able to --

23 (Map displayed.)

24 Q Okay. Can you see -- Do you see something showing
25 up on your screen?

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1 A Yes.

2 Q Okay. So I'm on Dave's Redistricting App website.

3 Do you see that?

4 A Yes.

5 Q I'm going to navigate to Washington state.

6 Do you see that I've done that?

7 A Yes.

8 Q And list the current maps. I'll represent to you
9 that Dave's Redistricting has sort of a map representation
10 of the 2022 legislative map here on its website.

11 Do you see that?

12 A Yes.

13 Q And I'm going to click it to pull up the Legislative
14 Districts enacted by Washington.

15 Do you see the map there on your screen?

16 A Yes.

17 Q Okay. I want to start by asking when you got a map
18 proposal how did you -- how would you begin to assess
19 whether the Legislative Districts in the Yakima Valley
20 were a Latino opportunity district under the federal
21 Voting Rights Act?

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

24 A Typically because I wasn't the one drawing the maps,
25 if it was an internal map I would ask my colleague,

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1 Matt Bridges, typically to walk through the entire map; or
2 I would be on a call with other people, and he would walk
3 me through the map.

4 And so the thing I would look at is sort of within
5 the Yakima Valley, stretching from the Reservation over to
6 Pasco where are the different sort of known pockets of
7 population with a high percentage of Latino either
8 residents or citizen age population.

9 Q And were there any particular metrics that you would
10 look at as it pertains to a particular district? I'm
11 going to zoom in actually on District 15 here.

12 Do you see that I've done that?

13 A Yes.

14 Q And I'll ask the question again.

15 Are there particular metrics related to the proposed
16 district -- or in this case the actual district -- that
17 you would look at to assess whether the district might
18 comply with the Voting Rights Act?

19 MS. GOLDMAN: Objection, calls for a legal
20 conclusion.

21 A We would generally look at CVAP, and we would also
22 look at performance within a certain -- for certain races
23 that have occurred in the past.

24 Q (By Mr. Mulji) Okay. So let's talk about the CVAP.
25 I'm going to turn on -- I'm going to turn on CVAP 2019

1 data on Dave's Redistricting.

2 Do you see that?

3 A Yes.

4 Q Is that the CVAP data that was available to you all
5 during the redistricting process?

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

8 A I don't remember whether we used CVAP 2019 or CVAP
9 2020.

10 Q (By Mr. Mulji) Okay. For the purposes of our
11 discussion let's assume that's the case; and if you recall
12 otherwise later, you can let me know.

13 I turned on citizen voting age population, and I'm
14 hovering over District 15.

15 Do you see the figures for CVAP?

16 A Yes.

17 Q What is the Hispanic CVAP according to this map?

18 A 50.0 percent.

19 Q Okay. And do you understand that to be sufficient
20 generally to elect Latino candidates of choice in this
21 area?

22 MS. GOLDMAN: Objection to the degree it
23 calls for a legal conclusion.

24 MR. HUGHES: And an expert opinion.

25 A No, it is not sufficient in my opinion.

1 Q (By Mr. Mulji) Why do you say that?

2 MS. GOLDMAN: Same objection.

3 MR. HUGHES: Same objection.

4 A Because voter turnout is really poor in this part of
5 the state; and so if you have two candidates running
6 against each other the Latino candidate would likely need,
7 you know, significantly higher turnout to actually be
8 elected. Their participation rates, especially in
9 non-presidential years, can be as much as 20 percent or
10 more lower than White voter turnout.

11 Q (By Mr. Mulji) You mentioned that you'd also assess
12 performance with respect to certain elections. By that do
13 you mean how this district would have performed to elect
14 certain candidates in past races?

15 A Yes.

16 Q And which races did you typically analyze or look
17 at?

18 A There was a preference amongst the people who drew
19 the maps between the House and Senate teams to use what's
20 called Pellicciotti 2020, which was the performance of
21 Mike Pellicciotti of the state treasurer's race in the
22 year 2020.

23 Q And in that race what was your understanding
24 about -- Well, did you have an understanding of who the
25 candidate, the Latino candidate of choice was in that

1 race?

2 A In which race?

3 Q In the Pellicciotti race.

4 A Oh, no. I'm sorry. We would use the Pellicciotti
5 number to determine how Democratic a district would be.

6 Q I see.

7 A There was not a Latino candidate in that race.

8 We generally used high turnout races in presidential
9 cycles to give ourselves the best sense. There was also a
10 composite breakdown that was used that incorporated
11 multiple races, and that would give you the partisan lean
12 of a given district.

13 Q Did you ever or anyone on your team look at the
14 races analyzed by Dr. Barreto to see how the district
15 would perform to elect the candidates of choice, Latino
16 candidates of choice in those locations?

17 MS. GOLDMAN: Objection, compound, calls
18 for speculation, lack of foundation, and calls for a legal
19 conclusion.

20 Q (By Mr. Mulji) You can answer.

21 A I don't remember performing that exercise, but I
22 also didn't use the mapping tool on behalf of the team.

23 Q And who would have been the person on the mapping
24 team that would have done this kind of analysis?

25 A Matt Bridges.

1 MS. GOLDMAN: Objection, asked and
2 answered.

3 MR. HUGHES: And misstates the prior
4 testimony.

5 Q (By Mr. Mulji) Go ahead.

6 A Matt Bridges.

7 Q What was the significance -- Well, let me ask, the
8 district -- What's the significance of labeling the Latino
9 opportunity district, if there is one, District No. 15
10 versus 14?

11 MR. HUGHES: Objection, calls for a legal
12 conclusion, and vague.

13 A Districts 14 and 15, the Senate races are up in
14 different cycles. So while the House seats in both
15 districts are up every two years, the 14th Legislative
16 District is -- the Senate seat, that election is held
17 concurrent with the presidential election, which has not
18 only higher turnout statewide than the midterms, but in
19 this area in particular has dramatically higher turnout
20 than the midterms.

21 So to create a performing district in the 14th would
22 not require as much movement away from the 50 percent
23 threshold because the turnout rates are higher. A bare
24 minimum CVAP district that elects the Senate -- senators
25 in the midterm elections is unlikely to produce a

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1 candidate of choice because the Latino turnout is so much
2 lower than the White turnout in those cycles.

3 Q (By Mr. Mulji) What's the basis of your knowledge
4 regarding Latino turnout in this region?

5 A The Secretary of State's office has turnout numbers
6 for almost every election over the last ten years, and
7 that was part of the materials on the Secretary of State
8 website that our team looked at in understanding
9 differences.

10 It's also based on certain general awareness of
11 election results that I've acquired over the last ten
12 years.

13 Q And your team analyzed Latino turnout in midterm
14 versus presidential elections; is that right?

15 A We --

16 MR. HUGHES: Sorry. Objection, leading.

17 Q (By Mr. Mulji) You can answer.

18 A We looked at turnout trends on the whole in these
19 particular Legislative Districts and also looked at
20 turnout in the Yakima City Council districts where there's
21 heavy Latino population and noted the disparity in turnout
22 in those primary and general elections in those off-year
23 elections.

24 There's also been some social science research into
25 the issue, and I was aware of that when working on

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1 redistricting.

2 Q I'm going to turn on a layer called city lines.

3 Do you see that?

4 A Yes.

5 Q I'll represent to you that that layer turns on -- it
6 shows you what the city boundaries are in this region.

7 Do you see that?

8 A Yes.

9 Q And I'm just going to zoom in. I'm actually going
10 to also turn on the city labels. I'll figure it out.

11 Okay. Do you see that when I hover over a
12 particular area on the right-hand panel it tells you what
13 city I'm hovering over?

14 A Yes.

15 Q Okay. I just want to note a few different features
16 of this map. Is the City of Wapato included in the
17 Legislative District 15?

18 A No.

19 Q Did discussion of which district the community of
20 Wapato would be included in, did that come up in your --
21 over the course of your redistricting process?

22 A Yes.

23 Q In what context?

24 A Our team understood that the jurisdictions with the
25 largest Latino population tended to run along a line that

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1 you can see here between the 14th and 15th LDs, and so a
2 lot of the conversation that we had was how to draw
3 districts that would be both inclusive of these cities
4 that are both heavily Latino as well as the Yakama
5 Reservation to the west.

6 Q And that line separating Districts 14 and 15, does
7 that -- Is that --

8 Well, are you referring to communities kind of
9 along -- I can't remember what highway it is. There's a
10 highway that runs from Yakima to Sunnyside.

11 A I believe it's 84.

12 Q Highway 84. When you were discussing the high
13 Latino --

14 Well, what's your understanding of the communities
15 that are sort of along that highway from Yakima, the City
16 of Yakima to the City of Sunnyside?

17 MS. GOLDMAN: Objection, vague, compound.

18 A Our understanding was that to draw a performing
19 district, that one of the things you wanted to look at
20 were these heavily Latino cities along Highway 84.

21 Q (By Mr. Mulji) And what were those cities, as far as
22 you know?

23 A Wapato, Sunnyside, Toppenish. Sorry, you're
24 hovering over a couple of things. I have to look here
25 real quick.

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1 Q Let me know if you want me to zoom out or zoom in.

2 A Those were the ones we talked about the most.

3 Q Okay. And in the current enacted plan those
4 communities were not included with the district that
5 includes the City of Yakima; correct? Or at least the
6 eastern part of Yakima.

7 A Those cities are in the 14th Legislative District in
8 the current map.

9 Q And Wapato and Toppenish are split from Sunnyside;
10 correct?

11 A Yes.

12 Q What's your understanding of sort of the
13 geographic -- the geography of race in the City of Yakima?

14 MS. GOLDMAN: Objection, vague.

15 A The way it was explained to me was that there is a
16 significant legacy of redlining in Yakima, such that we
17 have a high proportion of Whites along one side of the
18 east/west access and a high percentage of Latinos on the
19 other side of the east/west access.

20 Q (By Mr. Mulji) And what side is primarily the
21 Latino side of the city?

22 A I believe it's the east, but -- Did I get that
23 right?

24 MS. GOLDMAN: I'm going to belatedly object
25 on lack of foundation and calls for speculation.

1 Q (By Mr. Mulji) You can answer if you know.

2 A I don't remember.

3 Q Was there any discussion about the placement of the
4 community of Mattawa and what district that would be in
5 during the redistricting process?

6 A Yes.

7 Q What were those discussions?

8 A Subsequent to receiving the analysis from
9 Dr. Barreto we had a conversation around rethinking how to
10 draw the performing district in the Yakima Valley, and we
11 started to draw some maps that included Mattawa to the
12 north in the district that would perform.

13 Q And zooming out a bit. Do you see that I've zoomed
14 the map out?

15 A Yes.

16 Q I'm now hovering over the City of Othello.

17 How, if at all, did the City of Othello figure into
18 discussions of the configuration of the 15th District?

19 A I don't remember discussions of Othello.

20 Q Do you believe that the 15th District satisfies the
21 requirement for a Latino opportunity district under the
22 federal Voting Rights Act?

23 MS. GOLDMAN: Objection, calls for a legal
24 conclusion.

25 A No, I don't believe it does.

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1 Q (By Mr. Mulji) Did you have that same belief when
2 you first saw the 15th District that was adopted by the
3 commission?

4 MS. GOLDMAN: Same objection.

5 A Yes.

6 Q (By Mr. Mulji) What was the basis for that
7 conclusion?

8 MS. GOLDMAN: Same objection.

9 A That was based on looking at the CVAP, looking at
10 how communities were allocated between the different
11 districts in the Yakima Valley, as well as informal
12 conversations with a handful of experts, including, as
13 previously mentioned, Yuriy Rudensky, Dr. Barreto, and
14 Abha Khanna.

15 Q (By Mr. Mulji) Did you discuss whether --
16 Did you discuss your belief about the legality of
17 the 15th District with Commissioner Walkinshaw?

18 MS. GOLDMAN: Same objection, calls for a
19 legal conclusion.

20 A Yes.

21 Q (By Mr. Mulji) When was that discussion?

22 A The week prior to the redistricting deadline when
23 staff was working out of his offices.

24 Q Okay. Was the configuration of the 15th District
25 that you were discussing at the time, was that

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1 substantially -- Was that similar to the 15th District
2 that was ultimately adopted?

3 MS. GOLDMAN: Objection, calls for
4 speculation, and lack of foundation.

5 A Whose version of the 15th?

6 Q (By Mr. Mulji) Well, was there a version of the
7 15th District that you were looking at at the time that
8 resembled the 15th District as adopted?

9 MS. GOLDMAN: Objection, vague.

10 A Yes.

11 Q (By Mr. Mulji) And where did that --
12 Who proposed that district?

13 A This is similar to the district that the House
14 Democratic Caucus told our team that they would be
15 negotiating with the Republicans.

16 Q And do you know was it the House Democratic Caucus
17 that originally came up with this configuration of the
18 15th District?

19 MS. GOLDMAN: Objection, calls for
20 speculation, lack of foundation.

21 A I don't remember that.

22 Q (By Mr. Mulji) But you remember seeing a district
23 that looked like this one?

24 A Yes.

25 Q And you remember talking to Commissioner Walkinshaw

1 about it?

2 A Yes.

3 Q Okay. And that was during the week leading up to
4 the deadline, November 15th?

5 A Yes.

6 Q And what did you discuss during that meeting?

7 A Staff tried to explain to him again that in spite of
8 the House wanting to make the more heavily Latino district
9 the 15th, that that was a significant strategic error and
10 that he should be advocating for the 14th to be the
11 performing district.

12 And we also warned him about voting for a map that
13 would have a bare minimum CVAP in any district in the
14 Yakima Valley.

15 Q And in advocating for a district numbered 14 rather
16 than 15, what was animating that advice you were giving
17 Commissioner Walkinshaw?

18 A We believed that it was more appropriate for the
19 performing district to be one that had a greater turnout
20 and a turnout that more closely resembled voter turnout as
21 a whole, which is what happens during presidential cycles.

22 Q And you would get that by labeling the district 14
23 for all three legislative seats elected from -- or, well,
24 I guess the Senate seat, anyway.

25 If you label a district 14 the Senate seat would be

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1 elected in presidential years where there's higher
2 turnout; is that what you're saying?

3 A Yes.

4 MR. HUGHES: Objection, form.

5 Q (By Mr. Mulji) And how did Commissioner Walkinshaw
6 respond to these points?

7 A By the end of the week that we were at his office it
8 was clear that he felt like he was not going to be able to
9 persuade any of his colleagues to draw a performing
10 district, and he communicated that to staff.

11 Q Did he say why he felt he could not persuade any of
12 the other commissioners?

13 A No. He didn't go into detail. He just made it
14 clear to us that it was going to be too hard.

15 Q Was anyone else present at this conversation other
16 than -- Well, actually, who was present for this
17 conversation?

18 A That would have been Commissioner Walkinshaw,
19 myself, Ali O'Neil, Matt Bridges and Adam Bartz. That was
20 the staff team that was working out of that office that
21 week. Some combination of us were there when he made the
22 comment.

23 Q And was this -- What was the purpose of this
24 meeting? Yeah, what was the purpose of this meeting?

25 A Staff had several conversations with him that week

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1 about holding firm on a Democratic -- excuse me -- on a
2 performing district; and we were organizing calls with
3 both him and Commissioner Sims to try to keep that
4 preserved as a priority, and potentially something that
5 would result in the two of them not voting in favor of the
6 map and sending the map-drawing process to the State
7 Supreme Court.

8 Q Why did -- Why did --

9 Why was that proposed as a course of action?

10 A Can you restate the question?

11 Q Yes. You mentioned that you had brought up the
12 possibility of not -- of the two Democratic commissioners
13 not voting for a map.

14 Why was that suggested as a course of action?

15 A VRA compliance had come up in the state of Virginia
16 previously in the redistricting cycle, and so we looked at
17 that as a possibility.

18 Senators Billig and Pedersen from very early on in
19 the process when talking with Commissioner Walkinshaw,
20 with House members and with staff, indicated that they as
21 the senators were very comfortable with the map being
22 drawn by the State Supreme Court if a -- if they -- if the
23 commissioners couldn't reach agreement on a map that they
24 considered was fair.

25 Q During this conversation did you or anyone else tell

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1 Commissioner Walkinshaw that you believed the district
2 that he was considering that looked like the one that was
3 ultimately adopted wouldn't elect Latino candidates of
4 choice?

5 A Yes.

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

8 A Yes.

9 Q (By Mr. Mulji) Did Commissioner Walkinshaw make any
10 indication that he disagreed with you?

11 MS. GOLDMAN: Objection, vague.

12 A No. He considered the problem to be the fact that
13 Commissioner Sims didn't view it as a priority and that
14 the Republican commissioners would never agree to it.

15 Q (By Mr. Mulji) During that conversation he indicated
16 that Commissioner Sims did not think VRA compliance was a
17 priority; is that what you mean?

18 A Yes.

19 Q And he understood that the district that was being
20 considered was not VRA compliant? Is that the impression
21 you came away with?

22 MS. GOLDMAN: Objection, calls for
23 speculation, lack of foundation, and calls for a legal
24 conclusion.

25 A Yes.

1 Q (By Mr. Mulji) Was that -- To the extent you
2 remember, was that toward the beginning of the week
3 preceding the November 15th deadline or somewhere in the
4 middle or somewhere toward the end?

5 A The Redistricting Commission deadline was, I
6 believe, Monday night at midnight, and we had spent the
7 prior workweek at Commissioner Walkinshaw's offices.

8 We had a number of conversations with him leading up
9 to a couple of pretty critical meetings on Saturday and
10 Sunday. One meeting that I believe both commissioners
11 took with Dr. Barreto and I believe Chad Dunn from UCLA
12 and a separate meeting that Commissioner Sims and
13 Commissioner Walkinshaw took with the Redistricting
14 Justice Coalition, and both meetings were designed to talk
15 about the WVRA.

16 Q When you say the WVRA do you mean the Voting Rights
17 Act?

18 A Sorry. The federal Voting Rights Act.

19 Q Okay. And at that first meeting with -- Let's talk
20 about the first meeting with Dr. Barreto. Well, actually
21 before we go there, was there ever a conversation about
22 how Commissioner Walkinshaw would sort of go into the
23 final round of negotiations, what his priorities were
24 during those negotiations or anything like that?

25 A Yes.

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1 Q What was your understanding of how he was going to
2 approach the negotiations in the final week?

3 A I think by the time that we left his office the
4 Friday prior it was very unclear what he would be fighting
5 for in those negotiations.

6 Q By that time I think you told me earlier he had
7 already mentioned to you all, his staff, that he wasn't
8 going to or wasn't going to be able to fight for a
9 compliant VRA district in the 14th or in the Yakima
10 Valley; correct?

11 A Yes.

12 Q So that -- And during that week before the
13 November 15th deadline I just want to clarify where
14 everybody was.

15 You all were working from his offices at Grist; is
16 that right?

17 MS. GOLDMAN: Objection, vague.

18 A Can you restate the question?

19 Q (By Mr. Mulji) Yes. Where were you -- You
20 mentioned, I think, that you had been working from out of
21 his offices at Grist; correct?

22 A Yes.

23 Q When was that?

24 A The Monday through Friday of the preceding week.

25 Q Okay. So during that week that's where you all --

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1 all of you on the Senate Democratic Caucus team were
2 there?

3 A Yes. And I'm trying to remember if we were also
4 there on Saturday and Sunday, and I don't remember. I
5 think we may have worked there at some part of Saturday
6 and Sunday as well, but we were there from 8:00 to 5:00
7 Monday through Friday, with people taking breaks and going
8 to deal with other things; but all of us were in the
9 office regularly at that point.

10 Q Okay. And do you recall any other conversations
11 that you had with Commissioner Walkinshaw about the VRA
12 during that week?

13 A I may have talked to him after those meetings with
14 Dr. Barreto and the advocates, but I don't remember. I
15 remember talking to other folks on staff after those
16 meetings.

17 Q What was the purpose of the meeting with
18 Dr. Barreto?

19 MR. HUGHES: Object to form.

20 Q (By Mr. Mulji) You had mentioned that there was a
21 meeting and -- I'll strike that question.

22 You had mentioned there was a meeting with
23 Dr. Barreto and sometime just before the November 15th
24 deadline; is that right?

25 MR. HUGHES: Object to form.

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1 A Yes.

2 Q (By Mr. Mulji) Do you recall when that meeting
3 occurred?

4 A I want to say it was the Saturday prior. It was
5 within a couple days of the deadline.

6 Q That Saturday would have been November 13th; is that
7 right?

8 A Yeah, somewhere in there.

9 Q And what was the purpose of that meeting?

10 A I think that staff was frustrated that neither
11 Democratic commissioner was taking seriously the concerns
12 about compliance with the federal Voting Rights Act, and
13 that it was being echoed by Dr. Barreto.

14 And so we organized one last call with both
15 commissioners and Dr. Barreto and Chad Dunn to sort of
16 walk through the VRA, any questions the commissioners
17 might have, and give Dr. Barreto one last chance to sort
18 of talk to the commissioners before they went down to
19 Federal Way for the last couple days of negotiations.

20 Q And you arranged this meeting?

21 A I think I helped arrange it.

22 Q Okay. Who else helped arrange it?

23 A Probably Ali. And I think this was a meeting where
24 we were all -- the entire staff team was on the call, so
25 we were all sort of trying to coordinate at that point.

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1 Q And it's fair to say the purpose of this call was to
2 stress the importance of complying with the federal Voting
3 Rights Act; is that right?

4 A Yes.

5 Q You mentioned that there was also a meeting with the
6 Redistricting --

7 A Justice.

8 Q -- Justice Coalition.

9 Okay. And what was the purpose -- Well, actually,
10 who was at that meeting?

11 A Commissioner Sims and Commissioner Walkinshaw
12 participated on Teams. I was not on the Zoom but sitting
13 in the room listening to the meeting. And then there were
14 probably half a dozen folks from the Redistricting Justice
15 Coalition participating in the meeting with the two
16 commissioners.

17 Q And I'm sorry, I want to go back and ask you a
18 question about the meeting with Dr. Barreto.

19 What did Commissioner Sims say during that meeting
20 about her position on the Voting Rights Act in the Yakima
21 Valley?

22 A She tried not to share too much in meetings; and I
23 think she may have asked some questions, but I don't
24 remember any particular comments that stood out to me in
25 that meeting.

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1 Q And what about Commissioner Walkinshaw, did he have
2 questions?

3 A I don't remember him having a lot of questions at
4 that meeting.

5 Q Okay. Did either of the commissioners make a
6 commitment to try to get a compliant -- Voting Rights Act
7 compliant district in the Yakima Valley?

8 A No.

9 Q And then going back to the meeting with the
10 Redistricting for Justice Coalition, what was the
11 coalition trying to communicate as far as you could tell
12 to the commissioners during that meeting?

13 MS. GOLDMAN: Object -- Objection, calls
14 for speculation, and lack of foundation.

15 A They were trying to communicate their preference in
16 terms of districts, and they also wanted to talk strategy.

17 Q (By Mr. Mulji) What do you mean by strategy?

18 A They had one of the people who was part of the
19 coalition had talked to a Stanford professor, and they had
20 some idea -- and I don't even remember what the content of
21 the idea was. They were just, I think, trying to figure
22 out how they could get the commissioners to move towards a
23 compliant map.

24 Q Did you think of these meetings as sort of a last-
25 ditch effort to try to convey the importance of complying

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1 with the Voting Rights Act to the commissioners?

2 A Yes.

3 Q Did it succeed?

4 A No.

5 Q Let's talk about sort of what happened on
6 November 15th. Well, actually -- Yeah, on November 15th.
7 Where were you on November 15th?

8 A I spent the afternoon and evening at Matt Bridges'
9 house. Myself, Adam Bartz and Matt were in a room
10 together while the commissioners and Ali O'Neil were in
11 Federal Way.

12 Q Okay. And was it your understanding that all the
13 commissioners were in Federal Way by that day?

14 MS. GOLDMAN: Objection, calls for
15 speculation, and lack of foundation.

16 A That's what I was told.

17 Q (By Mr. Mulji) And how were you sort of keeping
18 apprised of what was happening in Federal Way during this
19 day?

20 A Ali would be checking in with us on a regular basis.
21 A lot of text messages, lots of Teams chats, lots of phone
22 calls.

23 We spoke on a pretty regular basis with key
24 legislators in terms of strategy because it was clear that
25 negotiations were not moving quickly.

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1 Q Were you aware of a meeting between Commissioner
2 Graves and Commissioner Walkinshaw on the morning of
3 November 15th?

4 A I don't remember.

5 MR. MULJI: Okay. I want to mark --

6 And let me first verify where we are in our exhibit
7 numbers.

8 THE REPORTER: No. 10.

9 MR. MULJI: -- as Exhibit 10 document Q.

10 (Hall Exhibit No. 10 introduced.)

11 A Thank you.

12 Sorry, which side?

13 Q Yeah, good question.

14 A I've got 8:01 and 8:02. On the left-hand column
15 does it say 8:01 or 8:02?

16 Q Okay. So this is the start.

17 Okay. So there should be four Teams chat messages,
18 and on the page where you have where the first message on
19 the Teams chat starts at 10:38, --

20 A Okay.

21 Q -- that would be the first one. And then the next
22 one is on the right side of that page, and then it
23 continues on the back side left to right chronologically.

24 A Um-hmm.

25 Q I'll give you a moment to take a look.

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1 A Okay.

2 Q Have you had a chance to review the four screenshots
3 here?

4 A Yes.

5 Q Okay. In some ways this is easier to actually look
6 at on a screen, but --

7 Do you see on the second page of this exhibit the
8 third screenshot that it says -- It shows a message
9 starting at November 15th, 11:12 a.m.?

10 A Yes.

11 Q Okay. And if you go up from there, back up you can
12 see the first Teams screenshot on the first page of this
13 exhibit has the messages starting at 10:38 a.m. on
14 November 15th. Do you see that?

15 A Yes.

16 Q Okay. And do you recognize this to be a Teams chat
17 that you were participating in on November 15th?

18 A Yes.

19 Q Is this the Teams chat that you mentioned earlier
20 where Ms. O'Neil would provide you updates on what was
21 happening?

22 A Yes.

23 Q Okay. And do you recall this discussion about -- a
24 discussion about Commissioner Graves in the Teams chat?

25 A Yes.

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1 Q Does this help refresh your recollection about
2 whether there was a meeting between Commissioner
3 Walkinshaw and Graves around this time on November 15th?

4 A Yes.

5 Q What do you remember about -- hearing about that
6 meeting, anyway?

7 A We had tried to trade legislative map proposals with
8 Commissioner Fain, and our proposal with what we thought
9 was a compliant map was dismissed out of hand. And by the
10 midpoint of the day it was pretty clear that Commissioner
11 Graves and Sims would be the ones drawing the legislative
12 map.

13 Q What was your understanding of -- Well, did you
14 review any proposals by Commissioner Graves to
15 Commissioner Walkinshaw?

16 A I don't remember. I do remember reviewing some
17 proposals that were traded back and forth that day.

18 Q Did you discuss Commissioner -- any discussions that
19 Commissioner Walkinshaw had with Commissioner Graves
20 during the negotiations, whether it was on the 15th or
21 otherwise?

22 A I don't remember them offhand.

23 Q Did you speak with any staff members of
24 Commissioner Graves?

25 A No.

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1 Q Did you have any conversations that would inform
2 your views on what Commissioner Graves's sort of
3 negotiating position was?

4 A I would have gotten all of that from Ali.

5 Q Okay. And did you have an understanding at the time
6 of what Commissioner Graves's negotiating position was?

7 A Yes.

8 MR. HUGHES: Objection, lack of foundation.

9 Q (By Mr. Mulji) What do you recall about what you
10 were thinking at the time about Commissioner Graves's
11 negotiating position?

12 MS. GOLDMAN: Objection as to form.

13 MR. HUGHES: And lack of foundation.

14 Q (By Mr. Mulji) You can answer.

15 A It was clear to me that Commissioner Graves was
16 drawing a line in the sand that he wanted very specific
17 outcomes when it came to the 14th and 15th, and they were
18 about drawing a map that would appear to comply with the
19 federal VRA but not actually do so.

20 MR. MULJI: I want to mark as Exhibit 11 a
21 document labeled R.

22 (Hall Exhibit No. 11 introduced.)

23 Q Have you had a chance to review this document?

24 A Yeah.

25 Q I'll represent to you this is a screenshot of a

1 Teams chat from November 15th, 11:57 a.m.

2 Do you see that?

3 A Yes.

4 Q And is this the same Teams chat that Ms. O'Neil was
5 using to provide you all updates on what was happening?

6 A Yes.

7 Q You say in the first chat message on the screenshot,
8 anyway, at 11:57 a.m., "This locks in the 10-year-old map
9 that everyone hated."

10 Do you recall what -- or what were you talking about
11 with respect to the 10-year-old map that everyone hated;
12 what does that mean?

13 A The 2011 map that was adopted had a lot of
14 criticism, and there was a broad consensus amongst
15 stakeholders, legislators and others in the space that we,
16 quote, unquote, "lost" the negotiation with the Republican
17 commissioners, that they got a far more favorable map than
18 Democrats in that district.

19 And it also did not draw a performing district in
20 the Yakima region and, in fact, did not even attempt to
21 draw a performing map in the Yakima region.

22 Q And you go on in the next message to ask, "Is the
23 15th majority CVAP and underperforming, or are they not
24 talking about that?"

25 What were you getting at in that question?

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1 A I was trying to determine whether or not they were
2 drawing a 50.1 CVAP map that wouldn't actually perform.

3 Q And it's not indicated here who the blue is, at
4 least on this piece of paper, the darker colored messages
5 on the right-hand side.

6 A It's Ali O'Neil.

7 Q Okay. And how did she answer that question?

8 A That Commissioner Graves was insisting on it.

9 Q And you go on to say, "Yes. Because it will lock us
10 out in the lawsuit."

11 What did you mean by that?

12 A I had had a number of conversations with Dr. Barreto
13 about the implications of subsequent lawsuits were an
14 adopted map to the above 50 percent CVAP, but not perform.

15 And we had also had a conversation with the
16 Redistricting Justice Coalition before everyone moved down
17 to Federal Way where Commissioner Sims asked them how she
18 could be helpful in a lawsuit.

19 So at this point we were talking about, you know,
20 everything that was done on the map, what was the
21 implications on a potential lawsuit since it was clear we
22 weren't going to get a performing district in the Yakima
23 Valley.

24 Q Did you fear that a district that was over
25 50 percent Latino that underperformed would obscure the

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1 fact that it underperforms?

2 A Yes.

3 Q Did you understand the legal requirement to be that
4 the district needs to perform for the Latino community
5 regardless of what the population, exact population
6 numbers are in the majority-minority district?

7 MR. HUGHES: Objection.

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

10 Q (By Mr. Mulji) You can answer.

11 A Yes.

12 Q So these were messages that you -- These were
13 messages you were sending around noon on November 15th.

14 What's your understanding based on the information
15 you were getting that day of what happened after that in
16 the afternoon or evening of November 15th?

17 MS. GOLDMAN: Objection, vague, calls for
18 speculation, lack of foundation.

19 Q (By Mr. Mulji) You can answer if you know.

20 A My recollection is that after these conversations a
21 lot of the discussion that we had around the activity
22 happening down in Federal Way was more focused on meeting
23 the deadline and drawing other districts; that it felt
24 like this was the end of the conversation around
25 compliance with the federal Voting Rights Act in the 14th

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1 and 15th Districts.

2 Q Were you aware of any agreements that were reached
3 by the commissioners prior to the midnight deadline?

4 MR. HUGHES: Objection, vague.

5 A It was communicated to the staff team that the
6 commissioners had agreed upon certain political metrics
7 for most if not all of the Legislative Districts, which
8 included the Yakima districts in the valley.

9 Q (By Mr. Mulji) And what do you mean by agreement on
10 political metrics?

11 A The first thing the commissioners agreed to before
12 drawing any maps was what the partisan breakdown would be
13 of each individual district.

14 Q Okay. So your understanding was that they came to
15 an agreement on that. Did they come to an agreement --

16 Well, and do you know when that was?

17 MS. GOLDMAN: Objection, calls for
18 speculation, and lack of foundation.

19 Q (By Mr. Mulji) You can answer if you know.

20 A I don't remember.

21 MR. MULJI: I'm going to mark as Exhibit 12
22 a document labeled S.

23 MR. HUGHES: Thanks.

24 (Hall Exhibit No. 12 introduced.)

25 Q (By Mr. Mulji) Do you recognize this document to be

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1 a screenshot of the Teams chat that continued between you
2 and Senate Democratic Caucus staff and Ali O'Neil on
3 November 15th?

4 A Yes.

5 Q You can see that these messages on this screenshot
6 start at 8:24 p.m. Does this refresh your recollection
7 about sort of what the deal was -- or when the deal was
8 occurring that evening?

9 A Yes.

10 MS. GOLDMAN: Objection, vague.

11 Q (By Mr. Mulji) How does it refresh your
12 recollection?

13 A Throughout the evening of the 15th we were getting
14 regular updates about whether there was a deal, whether
15 there wasn't a deal, whether somebody was walking away
16 from the table, whether somebody wanted to reach an
17 agreement. It felt like it changed by the hour.

18 Q And do you know -- It sounds like --

19 Ali O'Neil sent a text message at 8:38 a.m. saying
20 we may have a deal in the next 10-15 minutes.

21 Do you know if that was around the time when a deal
22 was ultimately reached, or no?

23 A I don't remember.

24 Q Now, to be clear, the deal that was reached that you
25 know of on partisan metrics, did that include some deal on

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1 where the lines would be drawn?

2 MS. GOLDMAN: Objection, lack of
3 foundation, calls for speculation.

4 A Almost the entire map was talked about in the
5 context of partisan balance, but the other three caucuses
6 did seem to be all proposing similar maps in the 14th and
7 15th.

8 Q (By Mr. Mulji) So was it assumed that that sort
9 of -- that the other caucus -- that the map that was
10 ultimately used for the 15th would be whatever they had
11 previously agreed to prior to the 15th?

12 Does that make sense?

13 MS. GOLDMAN: Objection, vague.

14 Q (By Mr. Mulji) Let me ask it again. When the
15 agreement on partisan metrics was reached on November 15th
16 was it assumed that the 15th District looked the way it
17 was agreed to sometime prior to that?

18 MS. GOLDMAN: Objection, vague, calls for
19 speculation, and lack of foundation.

20 Q (By Mr. Mulji) You can answer if you know.

21 A Yes.

22 Q And how do you know that?

23 A Because the 15th District in its visual form looked
24 a lot like what the House Democratic Caucus had been
25 showing us for several days at that point.

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1 Q Okay. So after this like proposal on the metrics --
2 Well, what else do you know about what the agreement was
3 on partisan metrics? Did it concern every single --

4 What else do you know about what was included in
5 that, in that agreement?

6 MR. HUGHES: Objection, vague.

7 A I simply know that the commissioners, largely
8 Commissioner Sims and Graves, were negotiating over
9 partisan lean and were fixated on a handful of what they
10 considered to be swing or competitive districts.

11 Q (By Mr. Mulji) Do you recall what those swing or
12 competitive districts were?

13 MS. GOLDMAN: Objection, calls for
14 speculation, and lack of foundation.

15 Q (By Mr. Mulji) You can answer if you recall.

16 A The 5th, the 47th, and the 44th.

17 Q What was the significance of those particular
18 districts?

19 MS. GOLDMAN: Objection, lack of
20 foundation, calls for speculation.

21 A They were districts that I think the Republicans
22 felt were prime candidates for flipping from Democratic to
23 Republican; but Commissioner Graves also served as a house
24 member from the 5th, and Commissioner Fain served as the
25 State Senator from the 47th.

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1 The 44th was a district that was important to the
2 House Democratic Caucus because they wanted to shore up
3 one incumbent and draw another one out.

4 Q (By Mr. Mulji) What was the incumbent they wanted to
5 shore up in the -- Was it 47th?

6 A 44th.

7 Q The 44th. What incumbent did the House Democratic
8 Caucus want to shore up in the 44th District?

9 A April Berg.

10 MR. HUGHES: Sorry. Objection, calls for
11 speculation, and lack of foundation.

12 MS. GOLDMAN: Thank you.

13 And I just want to caution you to make sure you give
14 as a chance to object. Thank you.

15 Q (By Mr. Mulji) And I'm sorry, you said that the
16 House Democratic Caucus had another goal in the 44th?

17 A Yes.

18 Q What was that --

19 MR. HUGHES: Same -- Sorry. Same
20 objections. I'm, sorry.

21 Q (By Mr. Mulji) What was that goal?

22 MR. HUGHES: Same objections.

23 A To draw out then Senator Steve Hobbs.

24 Q (By Mr. Mulji) Okay. And I'm sorry. And who was
25 the person that they wanted to draw into that district?

1 MR. HUGHES: Objection, misstates --

2 MS. GOLDMAN: Objection.

3 MR. HUGHES: Sorry. Go ahead.

4 MS. GOLDMAN: Lack of foundation, calls for
5 speculation.

6 MR. HUGHES: And misstates the prior
7 testimony.

8 A The House Democratic Caucus made clear throughout
9 the entire process that they wanted to ensure that
10 Representative April Berg was in a safe seat, and she --
11 She and then Senator Hobbs were both representing that
12 same district.

13 It was my understanding that the House wanted to
14 draw a safer district that would be inclusive of where
15 Representative Berg lived and exclude where Senator Hobbs
16 lived.

17 Q (By Mr. Mulji) Do you know if Commissioner Sims made
18 her motives about the 44th District apparent to
19 Commissioner Graves?

20 MS. GOLDMAN: Objection, calls for
21 speculation, and lack of foundation.

22 A No. I only know that she made quite clear to the
23 Senate Democratic Caucus team that drawing a safe 44th for
24 Representative Berg was a priority.

25 (Court reporter request for clarification.)

1 THE WITNESS: Was a priority. Sorry.

2 Q (By Mr. Mulji) Were you aware of any offers made by
3 Commissioner Graves to Commissioner Sims to trade a
4 VRA-compliant district in the 15th for something else?

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

7 MR. HUGHES: And vague.

8 Q (By Mr. Mulji) Answer if you know.

9 A Yes.

10 Q What do you know about -- What is the offer?

11 A Ali O'Neil forwarded an email to our staff team that
12 was an email communication between Commissioner Graves and
13 Commissioner Sims where he effectively asked Commissioner
14 Sims to name her price for a VRA-compliant district.

15 Q And do you know if Commissioner Sims did so?

16 MS. GOLDMAN: Objection, calls for
17 speculation, and lack of foundation, and vague.

18 Q (By Mr. Mulji) You can answer.

19 A I don't know.

20 Q And what was -- Did Commissioner Graves suggest what
21 a fair price might be?

22 MS. GOLDMAN: Objection, calls for
23 speculation, and lack of foundation. And object as to
24 form.

25 A Not in that email.

1 Q (By Mr. Mulji) Did you ever learn what
2 Commissioner Graves had considered a fair price as the
3 negotiations continued?

4 MR. HUGHES: Objection, calls for
5 speculation, lack of foundation.

6 A I was told it was part of the discussions, but I
7 never saw an actual offer.

8 Q (By Mr. Mulji) Okay. I want to -- So --
9 Okay. So to get back to where we were. We were --
10 There was this disagreement on the partisan metrics
11 concerning a handful of districts you said.

12 What happened after that agreement was reached, as
13 far as your understanding?

14 A After there was agreement several staff persons were
15 tasked with drawing maps that would reflect those partisan
16 leanings. The task was actually somewhat difficult
17 because drawing a map based on partisan metrics means that
18 you have to ignore things like city boundaries and other
19 geographic features. So it ended up being a pretty
20 time-intensive process.

21 Q Was it understood that every caucus staff or every
22 commissioner's team would go off and draw maps to try to
23 meet -- match these -- this partisan criteria that were
24 agreed to?

25 MS. GOLDMAN: Objection, vague, calls for

1 speculation, and lack of foundation.

2 A I knew that at least one other staff team was doing
3 this, but I wasn't -- It was not clear to me how many were
4 doing it.

5 Q (By Mr. Mulji) Which staff team?

6 A I believe the House Democratic Caucus.

7 Q Okay. So at least after you reached this deal,
8 after the commissioners reached this deal, your team went
9 off to draw maps, and the House team went off to draw maps
10 is what you understand happened?

11 A Yes.

12 Q Okay. And did you -- Did your team end up drawing a
13 map that was proposed to the other commissioners during
14 this time?

15 A Yes, I believe so.

16 Q When was that map proposed, and to whom? Or I guess
17 to whom was that map proposed? Let's start with that
18 question.

19 A After midnight the map was completed. I do not know
20 who communicated it as an offer and to whom it was
21 offered.

22 Q Okay. And did that map include what you believed to
23 be a compliant Legislative District 14 or 15?

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion.

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1 A No, it did not include one.

2 Q (By Mr. Mulji) So the map -- The map that your team
3 proposed did not include a district that you believed
4 complied with the Voting Rights Act in the Yakima Valley?

5 MS. GOLDMAN: Objection, asked and
6 answered, and calls for a legal conclusion.

7 A Correct.

8 Q (By Mr. Mulji) Why did you -- Why did your team
9 propose a map that that you believe didn't include a
10 VRA-compliant district?

11 A We weren't negotiating at that point. At that point
12 we were told what was happening, and the team was directed
13 to draw a map.

14 Q And you were directed to draw a map by whom?

15 A Oh, I wasn't directed to draw a map.

16 Q Your team was directed to draw this map by whom?

17 A I don't know who actually made the call at that
18 point.

19 MR. MULJI: I want to mark -- Well, I want
20 to mark as Exhibit 13 a document labeled W.

21 THE WITNESS: Thank you.

22 MR. HUGHES: Thank you.

23 (Hall Exhibit No. 13 introduced.)

24 Q (By Mr. Mulji) Have you had a chance to take a look?

25 A Yes.

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1 Q Do you recognize this to be two screenshots of Teams
2 messages that the Senate Democratic Caucus staff was using
3 to communicate during November 15th?

4 A Yes.

5 Q And these chats start at 11:23 p.m.; correct?

6 A Yes.

7 Q By this time, 11:23 -- Well, there's a message
8 from -- and I'll represent to you that that is Ali
9 O'Neil -- that says, "We are reconciling the two maps."
10 What did -- What do you -- What do you understand
11 that to mean?

12 A I believe this is discussing separate maps generated
13 by staff from the House Democratic Caucus and Senate
14 Democratic Caucus prior to the midnight deadline.

15 Q Okay. And she goes on to share in the next message
16 at 11:24 p.m. House Dems version of the map, and there's a
17 Dave's Redistricting link.

18 Do you see that?

19 A Yes.

20 Q And it's, "Copy of Copy of 11/14 7:30 o.m. Merged D
21 Map - LD." That's the title of the map. Do you see that?

22 A Yes.

23 Q Did you understand this map to be sort of the House
24 Democratic Caucus's version of the map, their proposal
25 that they were going to make?

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1 What is this map? Let's start there.

2 A This map is the House staff's efforts to draw a map
3 based on the partisan numbers that had been agreed upon.

4 So because you can draw a million different maps
5 based on partisan breakdown of districts, the Senate
6 Democratic Caucus team and the House Democratic Caucus
7 team each drew their own version and then sought to
8 reconcile the two.

9 Q I see. She asks you all to flag issues with this
10 map; correct?

11 MR. HUGHES: Objection, misstates the
12 document.

13 A Yes.

14 Q (By Mr. Mulji) At 11:26 you respond, "Non-performing
15 15th." What did you mean by that?

16 A That this 15th LD, like prior versions that I had
17 seen in preceding days, did not perform for Latino voters.

18 MR. MULJI: I want to mark as Exhibit 14 a
19 document labeled W. Oh, no, I'm sorry, U.

20 MS. GOLDMAN: And while that's being handed
21 over could we look for an opportunity to stretch our legs
22 in the next --

23 MR. MULJI: Oh, yes.

24 MS. GOLDMAN: -- couple minutes?

25 MR. MULJI: Yes.

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1 MS. GOLDMAN: Not that this isn't really
2 fascinating, but I think it would help us make sure we're
3 all awake.

4 MR. MULJI: Yes. Late afternoon. Sorry.

5 MS. GOLDMAN: Thank you.

6 MR. MULJI: Yes.

7 (Hall Exhibit No. 14 introduced.)

8 Q (By Mr. Mulji) Have you had a chance to review --

9 A Yes.

10 Q -- this exhibit?

11 Okay. Do you recognize this to be another set of
12 screenshots of the Teams chat you were participating in
13 with the Senate Democratic Caucus staff on November 15th?

14 A Yes.

15 Q On the first page of this, or I guess the first
16 screenshot of this exhibit on the left side of page 1 I'll
17 represent to you that Ali O'Neil shares another Dave's
18 Redistricting link at 10:49, and in a message after that
19 also at 10:49 she says, "R's leg map," followed by a
20 message that says, "Need to go through and identify
21 issues."

22 What is this map?

23 A I believe this is the Republican legislative map
24 that reflects the partisan breakdown that was agreed to by
25 the commissioners.

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1 Q Do you know who proposed this map?

2 A No.

3 Q You only know that it was a Republican commissioner?

4 Or both, I suppose.

5 A I think it was both, but I don't know because I
6 wasn't there.

7 Q Okay. In any event, you were asked to sort of go
8 through and identify issues; correct?

9 A Yes.

10 Q I believe -- You and others on the Senate Democratic
11 Caucus staff go on to list out issues you see with the
12 map; correct?

13 A Yes.

14 Q And at some point at 11:07 -- and this is on the
15 third page of the exhibit, the screenshot on the left --
16 at 11:07 you say, "Matt, can you send me a map with the
17 member locations?"

18 What did you -- What were you asking for there?

19 A I was asking for Matt Bridges to produce a version
20 of the Republican proposal that was shared up thread but
21 that had our members' locations so that we could know
22 which of our members would be displaced by this map.

23 Q Okay. And on the last page of this exhibit, the
24 very last page, you say at 11:09, "Heavily Latino
25 precincts in Yakima proper split!"

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1 What did you -- What were you referring to there in
2 that message?

3 A That the Republican proposal divided the heavily
4 Latino precincts in the City of Yakima between the 14th
5 and 15th Legislative Districts.

6 Q And do you recall anything more about which
7 precincts were split at this point?

8 A I don't remember, no.

9 Q Okay. Do you remember this map? Do you remember
10 looking at this map, I should say.

11 A Yes.

12 MR. MULJI: Okay. I think this is a good
13 time for a break.

14 (Discussion off the record.)

15 (Break 2:47 p.m. to 2:55 p.m.)

16 MR. MULJI: I want to mark as Exhibit 15 a
17 document labeled Y.

18 MR. HUGHES: Do you have another copy for
19 me?

20 Q (By Mr. Mulji) So page 1 has holes at the top.

21 A I'm sorry. Which is at the top?

22 Q If you have the three-hole punch at the top, that's
23 page 1.

24 A Got it. Okay.

25 MR. HUGHES: Is this a continuation of 13?

1 (Hall Exhibit No. 15 introduced.)

2 Q (By Mr. Mulji) Do you recognize this to be a
3 continuation of the Teams chat of the Senate Democratic
4 Caucus team on November 15th and maybe going into
5 November 16th?

6 A Yes.

7 Q Okay. I want to -- At 11:38 p.m. you asked, "If we
8 can do a Q&A, can we ask the Rs about the Yakima Valley?"
9 What were you asking there?

10 A Throughout what I believe was described as a rolling
11 meeting the commissioners were coming on camera at
12 certain intervals, and they were supposed to be apprising
13 the public of what they were negotiating over; and so they
14 were having these stilted conversations about their
15 positions on different elements of the map.

16 And I was suggesting that if we continue with this
17 exercise and if we have actual back-and-forth dialogue on
18 camera, that one of the Democratic commissioners ask the
19 Republican appointed commissioners about the Yakima
20 Valley.

21 Q Were you watching these public meetings as they were
22 happening?

23 A Yes.

24 Q Did the commissioners apprise the public about what
25 was happening during -- in the negotiations?

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1 A I wouldn't characterize it that way.

2 Q How would you characterize it?

3 A They were coming on camera because they were facing
4 pretty significant pressure from news organizations that
5 they were conducting their business in private, so they
6 would come on camera to have the pretense of a meeting and
7 then go back off camera.

8 Q During the pretense of a meeting was there any Q&A
9 among commissioners?

10 MR. HUGHES: Object to form.

11 A No. My recollection would be that each one of them
12 would sort of basically say, "We're making good progress,"
13 and then sort of talk vaguely about a particular area of
14 the map.

15 Q (By Mr. Mulji) Was there any discussion of the
16 district in the Yakima Valley?

17 A Not that I remember.

18 Q Did this Q&A that you suggested -- Well, do you know
19 if any of the Democratic commissioners asked a question
20 about the Yakima Valley during this meeting? Or I guess
21 this series of meetings.

22 A I don't remember.

23 Q Okay. I guess I don't have any questions
24 specifically about this necessarily, but can you just tell
25 me how the vote happened as far as you understand it?

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1 MS. GOLDMAN: Objection, calls for
2 speculation, and lack of foundation.

3 Q (By Mr. Mulji) You can answer.

4 MR. HUGHES: And vague.

5 MS. GOLDMAN: And vague. I'm sorry, did
6 you say that?

7 MR. HUGHES: I did, yeah.

8 MS. GOLDMAN: I agree.

9 Q (By Mr. Mulji) I'll ask the question a little bit
10 more specifically.

11 Was there a vote by the Commission before midnight?

12 MS. GOLDMAN: Objection, calls for
13 speculation, lack of foundation.

14 Q (By Mr. Mulji) You can answer if you know.

15 MR. HUGHES: Also -- sorry -- I'm going to
16 object that that calls for a legal conclusion.

17 A The commissioners voted on something. I'm not sure
18 that the actual vote was recorded until after 12:01.

19 Q (By Mr. Mulji) You say they voted on something.
20 What is that something?

21 MS. GOLDMAN: Objection, calls for
22 speculation, lack of foundation.

23 MR. HUGHES: And calls for a legal
24 conclusion.

25 Q (By Mr. Mulji) You can answer.

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1 A It was a couple of things, none of which were a map.

2 They had the responsibility to fill out a resolution
3 and to send certain -- transmit certain files to I believe
4 it was the secretary of the Senate and the House chief
5 clerk, but it was nothing resembling a finalized map.

6 Q Were you aware of what the Commission's obligations
7 were regarding transmittal of an approved map?

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

10 A Yes.

11 Q (By Mr. Mulji) And what were they?

12 MS. GOLDMAN: Same objection.

13 Q (By Mr. Mulji) You can answer.

14 A To transmit a map before midnight.

15 Q And what did that look -- Documentation-wise what
16 was that supposed to entail?

17 MS. GOLDMAN: Same objection.

18 A We had looked at what was transmitted ten years
19 prior. There was a document with a legal description.
20 There was an actual map. There was a resolution. There
21 were accompanying files. Most of those things were not
22 transmitted in the official communication from the
23 Commission to the Legislature.

24 Q (By Mr. Mulji) Were any of those things transmitted
25 before midnight?

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1 MS. GOLDMAN: Objection, calls for
2 speculation, and lack of foundation.

3 A I recall that the vote finished shortly after
4 midnight and that an email communication was sent to the
5 Legislature shortly thereafter, sometime between 12:00
6 midnight and 1:00 a.m., but several of those documents
7 were empty.

8 Q What do you mean by that?

9 A They sent incomplete documents. In addition to not
10 transmitting a map, they sent incomplete documents.

11 Q And sent incomplete documents in their sort of
12 official transmittal to -- Sent to whom?

13 Who were these sent to?

14 A The Commission was responsible for transmitting all
15 of these documents to the Legislature. They did not
16 transmit all the required documents, and some of the
17 documents that they did transmit were incomplete.

18 Q Okay. Is it typical in a meeting of the Commission
19 for materials to be shared prior to the meeting that
20 pertain to the meeting that the Commission is going to
21 have?

22 MS. GOLDMAN: Objection, vague, calls for
23 speculation, and lack of foundation.

24 A Can you rephrase the question?

25 Q (By Mr. Mulji) I'm talking about like public notice

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1 requirements for public meetings. Are you familiar with
2 the notice requirements for public meetings in Washington
3 state?

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

6 A Yes.

7 Q (By Mr. Mulji) Did this meeting on November 15th
8 where the vote happened, did it comply with the notice
9 requirements of the OPMA, as far as you know?

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

12 A I'm not aware of any of the activities occurring
13 prior to 12:00 midnight happening inconsistent with the
14 requirements of the OPMA.

15 Q (By Mr. Mulji) Did the vote happen during a public
16 meeting? Were they -- What did that look like to you?
17 Were you watching the vote as it happened?

18 MS. GOLDMAN: Objection, compound times
19 three, calls for speculation, and lack of foundation.

20 MR. HUGHES: And calls for a legal
21 conclusion.

22 Q (By Mr. Mulji) I'll ask the last question that I
23 asked in my three-part question.

24 What did the vote look like as you were watching it?

25 A It was -- They came off -- There's basically a

1 screen on the broadcast that says, you know, meeting not
2 in session. They came off that. They came on screen.
3 The commissioners were all present, and they quickly made
4 the motion to adopt the proposal. They voted, and then
5 they went off screen.

6 Q Did anyone describe the proposal during that flash
7 of a public meeting?

8 MR. HUGHES: Object to form.

9 A No.

10 Q (By Mr. Mulji) Were you aware of what the proposal
11 was that was being voted on as you were watching?

12 A No.

13 Q On the second Teams chat message here at 11:49
14 Ali O'Neil says, "Now they're pushing us to vote without
15 maps." And you go on to say, "Like are we transmitting --
16 yes, we're most of the way there?" At 11:49, followed by
17 a couple of messages in all caps, "NO! DO NOT DO THIS!"

18 What was going on at 11:49 that you were sending
19 all-caps messages?

20 A That was in response to the comments from Ali O'Neil
21 regarding the desire of the Speaker to have the Commission
22 transmit the resolution by midnight, even if there weren't
23 maps, as well as the fact that someone was pushing
24 Commissioner Walkinshaw to vote without maps. I was
25 telling Ali that this should not be done.

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1 Q A couple followups. First you said the Speaker was
2 pushing for transmittal.

3 The Speaker, who is that?

4 A So at the bottom of the column it says, "The Speaker
5 wants to have the Commission transmit the resolution by
6 midnight."

7 Q Oh, I see. And who is the Speaker?

8 A That would be Speaker Laurie Jenkins.

9 Q Okay. Okay. And you said that someone was pushing
10 Commissioner Walkinshaw to vote yes on that; is that
11 right?

12 A Ali says, "Now they're pushing us to vote without
13 maps." So I assumed that that was in reference to other
14 commissioners and staff pushing Commissioner Walkinshaw to
15 vote without maps.

16 Q Okay. I see. Thank you.

17 And you watched the public meeting; right?

18 A Yes.

19 Q Do you know how Commissioner Walkinshaw voted?

20 A Yes.

21 Q How did he vote?

22 A He voted to adopt the map.

23 Q Or is it more accurate to say the proposal or
24 whatever it was that was voted on?

25 MR. HUGHES: Objection, leading.

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1 A He voted in favor of something.

2 Q (By Mr. Mulji) Did you speak to Commissioner
3 Walkinshaw prior to the vote on November 15th?

4 MS. GOLDMAN: Objection, vague.

5 A Can you reask the question?

6 Q (By Mr. Mulji) Yes. Did you speak -- Did you and
7 Commissioner Walkinshaw have a conversation on
8 November 15th before midnight?

9 A No.

10 Q Did you speak to anyone else who did have a
11 conversation with him that day prior to midnight?

12 A Yes.

13 Q Who was that?

14 A Senate Majority Leader Andy Billig, State Senator
15 Jamie Pedersen, Ali O'Neil.

16 Q What did "Governor" Billig tell you, if anything,
17 about his conversation with Commissioner Walkinshaw that
18 day?

19 A The Senate Majority Leader said that he had talked
20 with Commissioner Walkinshaw. I don't recall going into
21 details.

22 Q What about Jamie Pedersen?

23 A I believe he had a conversation with Commissioner
24 Walkinshaw around what the options were available to him.
25 This would have been not at 11:59 but maybe an hour or two

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1 earlier.

2 Q What do you mean by options that were available to
3 him?

4 A Voting yes, voting no, making a speech, not making a
5 speech. You know, different rationales for not -- for
6 voting or not voting for the map.

7 Q Did Jamie Pedersen express to you his view on what
8 Commissioner Walkinshaw should do?

9 A I don't recall.

10 Q Did he tell you what he told Commissioner
11 Walkinshaw?

12 A I don't recall.

13 Q And what about Ali O'Neil, did you talk to her about
14 her conversation with Brady prior to the vote?

15 A Yes, but she told me about it after the fact.

16 Q What did she tell you after the fact about that
17 conversation?

18 A That she gave him a bunch of reasons to either not
19 vote or vote no, and he didn't take any of them.

20 Q I want to ask you about something on this, on this
21 was it Exhibit 15? The last chat.

22 MS. GOLDMAN: Sixteen?

23 MR. MULJI: Yes. Oh, I'm sorry, no.
24 Fifteen.

25 MS. GOLDMAN: Fifteen.

1 MR. MULJI: Exhibit 15.

2 MS. GOLDMAN: Okay.

3 Q (By Mr. Mulji) The fourth screenshot, which is on
4 the second page on the right side. I guess you're looking
5 at it. But it's the chat, the screenshot that starts at
6 11:52 and then 12:00 a.m. on November 16th.

7 Ali O'Neil says, "Yes. It's a vote on the
8 agreement. We are still reconciling the maps," at 12:01.

9 Do you see that?

10 A Yes.

11 Q And you ask, "Is that Tera's view or the
12 commissioner's view" at 12:12 a.m. See that?

13 A Yes.

14 Q What did you mean by this question?

15 A It was unclear to me whether the Commission was
16 acting on guidance from their attorney from the Attorney
17 General's Office in taking a vote on a map that didn't
18 exist.

19 Q You say at 12:15 in this chat thread that, quote,
20 "I've been asked to chase that down tomorrow," end quote.

21 What did you mean by that?

22 A By this point I think we were all trying to figure
23 out what happened, and I think I had been delegated by
24 either senior staff or members of Senate Democratic
25 leadership to figure out legally what the heck had just

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1 happened.

2 Q Did you end up doing that?

3 A I tried.

4 Q What do you mean you tried?

5 A I think it was very unclear what had transpired and
6 whether it was legal for quite some time after the
7 deadline had passed.

8 Q Now, there was an OPMA lawsuit filed against the
9 Commission; correct?

10 A There were two.

11 Q There were two. Can you -- Briefly, what were the
12 two lawsuits about?

13 A I believe they covered the same claim, which is that
14 the Commission violated the Open Public Meetings Act in
15 how it adopted a plan after the November 15th deadline.

16 Q What was the outcome of those lawsuits?

17 MS. GOLDMAN: Objection, calls for
18 speculation, and lack of foundation.

19 MR. HUGHES: Objection, calls for a legal
20 conclusion.

21 MR. MULJI: Scratch that.

22 Q (By Mr. Mulji) Let me ask you a different question.
23 Did you follow the course of these lawsuits as they were
24 progressing in court?

25 A Yes.

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1 Q Were you deposed? You weren't deposed in that case;
2 correct?

3 A No.

4 Q Yes. And what do you understand was the outcome of
5 those cases?

6 MR. HUGHES: Objection, calls for a legal
7 conclusion.

8 A The commissioners were required to pay attorneys'
9 fees, undergo some training on the Open Public Meetings
10 Act, but the map was left in place.

11 MR. MULJI: Okay. I want to mark as
12 Exhibit 16 a document labeled ZA, and I will also mark as
13 Exhibit 17 a document marked ZB or labeled ZB.

14 MR. HUGHES: This is 16?

15 MR. MULJI: Yes.

16 THE WITNESS: Thank you.

17 MS. GOLDMAN: Thank you.

18 (Hall Exhibits No. 16 and 17 introduced.)

19 Q (By Mr. Mulji) Okay. We've passed around
20 Exhibits 16 and 17, and I believe they're coming in the
21 chat.

22 Have you seen Exhibit 16 before? That's the email.

23 A Yes.

24 Q What is it?

25 A It is a briefing email that I sent to Senators

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1 Pedersen and Billig upon the release of the settlement
2 agreement in the lawsuit.

3 Q And that was in the Open Public Meetings Act
4 lawsuits we were talking about earlier?

5 A Yes.

6 Q You attach to this document a Consent Decree and
7 Settlement or Consent Decree and Final Judgment in those
8 cases; is that right?

9 A Yes.

10 Q Do you recognize Exhibit 17 to be that document?

11 MR. HUGHES: I'm going to object to form
12 only as far as this is not a signed document.

13 A Yes.

14 Q (By Mr. Mulji) And it isn't signed; correct?

15 A The document in front of me is not signed on the
16 last page.

17 Q Where did you -- Where did you get this document,
18 the Exhibit 17?

19 MS. GOLDMAN: You just handed it to him.

20 MR. MULJI: Thank you, Counsel.

21 Q (By Mr. Mulji) Where did you obtain the copy of the
22 Consent Decree and Final Judgment that you shared by email
23 with Senators Pedersen and Billig?

24 A I don't remember.

25 Q Okay. I think maybe the -- Maybe the first

1 paragraph of your email clarifies, but I'm not sure, which
2 is why I'm asking.

3 It says, "The terms of the Consent Decree and
4 Settlement were not made public during the meeting, as the
5 document was not finalized at the time of the meeting
6 (this may sound familiar), but were leaked to the press
7 afterward, attached above."

8 Is this the leaked copy of the Consent Decree and
9 Judgment?

10 A Yes.

11 Q And have you reviewed the Consent Decree and
12 Judgment? Not now, but at some point in time?

13 A Yes.

14 Q When you sent this to the Commissioner -- or I'm
15 sorry, to Senators Pedersen and Billig, did you feel that
16 the Findings of Fact in this Consent Decree were accurate?

17 Do you have a recollection of a position on the
18 accuracy of this?

19 MS. GOLDMAN: Objection to the degree it
20 calls for a legal conclusion.

21 A Could you be more specific?

22 Q (By Mr. Mulji) Yeah. Did you have a position at
23 the time when you shared it on whether the facts about
24 what happened are accurate in this Consent Decree and
25 Judgment?

1 MR. HUGHES: Objection, compound.

2 MS. GOLDMAN: And calls for speculation,
3 and lack of foundation.

4 Q (By Mr. Mulji) You can answer.

5 A Yes.

6 Q I want to go back -- and I'm sorry for skipping
7 around. I want to go back to the public meeting or
8 meetings that were occurring on November 15th leading to
9 the vote of the commissioners.

10 Was there any opportunity for public comment during
11 those Zoom meetings?

12 A Not that I remember.

13 Q Do you remember any member of the public providing
14 public comment during those meetings?

15 A No.

16 Q What did the Commission do generally to solicit
17 feedback from the public on the redistricting process or
18 the proposed plans?

19 MR. HUGHES: Objection, vague and compound.

20 A Can you restate the question?

21 Q (By Mr. Mulji) Yes. What did the Commission do
22 generally to solicit feedback from the public on
23 redistricting, redistricting of the Legislative Districts?

24 MR. HUGHES: Objection, vague.

25 A It developed an outreach plan in the early stages of

1 2021. It held a number of what were effectively virtual
2 town halls with constituents from each region of the
3 state, and it held open public comment at a number of its
4 regularly scheduled meetings.

5 Q (By Mr. Mulji) How did the Commission incorporate
6 public comments into map proposals? Or actually how did
7 the Senate Democratic Caucus team do that?

8 MS. GOLDMAN: Objection, calls for
9 speculation, and lack of foundation.

10 A We developed a number of documents where we made
11 notes of specific requests made by members of the public,
12 and we also marked how frequently those requests were
13 made.

14 And in several instances where there was
15 overwhelming public testimony for or against something
16 that was not reflected in our most recent map proposal,
17 that would be adjusted.

18 Q (By Mr. Mulji) What was the thrust of the public
19 commentary about the Legislative Districts in the Yakima
20 Valley area?

21 MS. GOLDMAN: Objection, vague.

22 MR. HUGHES: And assumes facts not in
23 evidence.

24 A The testimony in public comment generally was in
25 favor of drawing a performance district in the Yakima

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1 Valley so that Latinos could elect a candidate of choice.

2 It reflected that a similar change had been made in
3 Yakima City Council Districts in the preceding years. And
4 there was also a direct request by members of the public
5 to comply with the federal Voting Rights Act or, as they
6 would put it, draw a VRA district.

7 Q (By Mr. Mulji) Is it your understanding that when we
8 say Latino voters' candidates of choice that we're talking
9 about the ethnic background of the candidates themselves?

10 MS. GOLDMAN: Objection, vague.

11 Q (By Mr. Mulji) Do you understand the question?

12 A I understand the question.

13 No.

14 Q Okay. So a candidate that is the candidate of
15 choice of the Latino community or Latino voters, that can
16 be a candidate of any racial or ethnic group; correct?

17 A Yes.

18 Q Okay. I think -- Oh, actually, I'm sorry. One more
19 thing.

20 Were you involved at all in the selection of the
21 Chair of the Commission?

22 A I provided advice and feedback to Commissioner
23 Walkinshaw, largely through Ali O'Neil, as different ideas
24 were floated, but the commissioners zeroed in on the
25 individual who was chosen to chair the Commission pretty

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1 early on.

2 Q Was that Ms. Augustine, Sarah Augustine?

3 A Yes.

4 Q What do you think about -- What was in your view
5 Ms. Augustine's role in the redistricting process?

6 A What's the role of the Chair, or what did she view
7 her role as?

8 Q How did she perform her role, as far as you saw it?

9 MS. GOLDMAN: Objection, vague, calls for
10 speculation, and lack of foundation.

11 A She was pretty hands on and wanted to establish a
12 significant role for herself in the process and wanted to
13 be seen as an equal to the other four voting -- to the
14 four voting commissioners.

15 Q (By Mr. Mulji) Did the commissioner -- or I'm
16 sorry. Did Commissioner Augustine preside over public
17 meetings of the Commission?

18 A Yes.

19 Q Did Commissioner Augustine set the agendas for these
20 meetings?

21 MS. GOLDMAN: Objection, calls for
22 speculation, and lack of foundation.

23 A Yes.

24 Q (By Mr. Mulji) Does that include the final meeting
25 on November 15th --

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1 MS. GOLDMAN: Same objection.

2 Q (By Mr. Mulji) -- when maps were adopted?

3 MS. GOLDMAN: Same objection.

4 A I don't know.

5 MR. MULJI: Okay. I think that's it. I
6 think I'm done with my questioning. Thank you.

7 MR. HUGHES: All right. Adam, do you want
8 a break, or do you want to just get right into it?

9 THE WITNESS: Are we doing two more rounds
10 of questions or one?

11 MR. HUGHES: Two, but you can take as many
12 breaks as you want whenever you want.

13 THE WITNESS: Five minutes?

14 MR. HUGHES: Of course. Can we go off the
15 record?

16 (Break 3:26 p.m. to 3:33 p.m.)

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

18 BY MR. HUGHES:

19 Q So Adam, to start, we know each other socially;
20 correct?

21 A Yes.

22 Q And over the past month or so have we had occasion
23 to remark upon the fact that you're being deposed in this
24 case?

25 A Yes.

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1 Q We never discussed the content of your deposition;
2 right?

3 A Correct.

4 Q I haven't shared any of my questions with you, have
5 I?

6 A No.

7 Q Okay. With that out of the way --

8 As far as you recall, when did the issue of a
9 majority Hispanic district in the Yakima Valley first
10 arise for you?

11 A When I accepted my current job with the caucus in
12 November of 2013 I assumed the portfolio over voting
13 rights and elections, which meant that I had occasion to
14 have a number of conversations with colleagues, with
15 legislators, with stakeholders about redistricting; and
16 one of the things that came up from that past cycle was
17 how the districts were drawn in the Yakima Valley in 2011.

18 Q So you have known since long before Dr. Barreto's
19 report in this case that there may be a need to create a
20 majority Hispanic district in the Yakima Valley?

21 A Yes.

22 Q And let me -- Let me clarify that last question.
23 When I say a majority Hispanic district I meant a majority
24 Hispanic CVAP district.

25 Does that change your answer?

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1 A No.

2 Q And going forward I'm going to try to say majority
3 Hispanic CVAP district, but if I slip, understand that I'm
4 always talking about CVAP here. Okay?

5 Do we agree on that?

6 A Yes.

7 Q Okay. Perfect.

8 You've talked about a lot of things today that have
9 gone into that conclusion about the need to create a
10 majority Hispanic CVAP district in the Yakima Valley, but
11 just for the clarity of the record I want to try and put
12 them all in sort of one place.

13 So can you briefly list out the things or the
14 communications that went into your thinking about the need
15 to create a majority Hispanic CVAP district in the Yakima
16 Valley?

17 MS. GOLDMAN: Objection, vague.

18 A Can you restate that question? Specifically the
19 timing of that.

20 Q (By Mr. Hughes) Yeah. So from when you first took
21 this job -- Well, strike that.

22 I'm trying to get a sense of what you based your
23 belief on that the Commission would need to create a
24 majority Hispanic CVAP district in the Yakima Valley. So
25 can you walk me through the things that went into your

1 conclusion there?

2 A I think that there were two issues for myself and
3 the members of my team. The first was whether we were
4 required to draw a map under the Federal Act, and the
5 second was what the public testimony was reflecting in
6 terms of the wishes of state and local advocates and local
7 community members with regards to how the boundaries were
8 drawn in the Yakima Valley.

9 Q Okay. And as for the first part of that, whether
10 you would need to create a majority Hispanic CVAP district
11 in the Yakima Valley, was that conclusion informed by your
12 reading, your understanding of the Montes v. Yakima case?

13 A Yes.

14 Q Was it informed by any other case law that you read?

15 A Yes.

16 Q Which cases, if you remember?

17 A In the run-up to the redistricting process before we
18 had appointed a commissioner I was doing a general review
19 of voting rights. There's a slide deck on the Department
20 of Justice's website which is like an intro to Voting
21 Rights Act requirements in redistricting, as well as
22 review of the major cases that have been handed down by
23 the U.S. Supreme Court since the 1970s.

24 Q And you mentioned that a case called Glatt v. Pasco;
25 do you recall that? I can ask it a different way.

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1 You mentioned a VRA case involving the City of
2 Pasco; correct?

3 A A state VRA, or was it -- No, it was a federal case.
4 Yes.

5 Q And did the fact that there was a VRA litigation
6 involving the City of Pasco factor into your conclusion
7 about the need to create a majority Hispanic CVAP district
8 in the Yakima Valley?

9 MS. GOLDMAN: Objection to the degree it
10 calls for a legal conclusion.

11 A I was aware of the lawsuit. It was not clear to me
12 at the time the implications it would have for specific
13 districts being drawn in the Yakima Valley.

14 Q (By Mr. Hughes) You mentioned speaking with Yurij
15 Rudensky at the Brennan Center. Did your conversations
16 with Mr. Rudensky inform your conclusion about the need to
17 create a majority Hispanic CVAP district in the Yakima
18 Valley?

19 MS. GOLDMAN: Objection to the degree it
20 calls for a legal conclusion.

21 A Yurij stressed to me that the important
22 consideration was whether or not the district performed,
23 not whether it was majority CVAP.

24 Q (By Mr. Hughes) Nonetheless, did communications with
25 Yurij Rudensky inform your understanding of the VRA

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1 requirements as applied to the Yakima Valley?

2 MS. GOLDMAN: Same objection.

3 A Yes.

4 Q (By Mr. Hughes) Did Dr. Barreto's analysis in this
5 case inform your understanding about the need to create a
6 majority Hispanic CVAP district in the Yakima Valley?

7 MS. GOLDMAN: Same objection.

8 A Yes.

9 Q (By Mr. Hughes) Did communications with Abha Khanna
10 inform your understanding about the need to create a
11 majority Hispanic CVAP district in the Yakima Valley?

12 MS. GOLDMAN: Same objection.

13 A Yes.

14 Q (By Mr. Hughes) Aside from the communications that
15 we just discussed, was there anything else as you sit here
16 today that you can recall informing your conclusion about
17 the need to create a majority Hispanic CVAP district in
18 the Yakima Valley?

19 MS. GOLDMAN: Same objection.

20 A Yes. I had at least one and probably closer to
21 three or four conversations with Noah Purcell about
22 compliance with the federal Voting Rights Act between
23 November, 2013 and January, 2021.

24 Q (By Mr. Hughes) Anything else?

25 A I would say -- Did we already talk about sort of my

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1 own independent research and review of case law?

2 Q I believe you made reference to that, yeah.

3 A I think that's it then.

4 Q And you communicated that to Commissioner
5 Walkinshaw, your view of what the VRA required here?

6 A Yes.

7 Q You mentioned that you conveyed that understanding
8 many times; do you recall that?

9 A Yes.

10 Q Did you convey that understanding to any other
11 commissioners?

12 A Yes.

13 Q Which other commissioners?

14 A April Sims.

15 Q Did you ever speak -- Strike that.

16 Did you convey that understanding to Commissioner
17 Graves?

18 A Not directly. I don't know what Commissioner
19 Walkinshaw said to Commissioner Graves.

20 Q Did you convey that understanding to Commissioner
21 Fain?

22 A Again, not directly. And I don't know what
23 Commissioner Walkinshaw said to Commissioner Fain about
24 what I had provided.

25 Q Did you ever speak to Commissioner Graves throughout

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1 this process?

2 A No.

3 Q Did you ever speak to Commissioner Fain throughout
4 this process?

5 A No.

6 Q The commission was tasked with drawing both
7 legislative and congressional maps; correct?

8 A Yes.

9 Q And is it fair to say that early in the process the
10 commissioners agreed that Commissioners Walkinshaw and
11 Fain were primarily responsible for the congressional
12 maps?

13 A No.

14 Q What's wrong about that?

15 A Staff continued to work on legislative proposals up
16 until the final day or days of the redistricting process
17 prior to the deadline. We were not privy to any
18 conversations or deals the commissioners had made with
19 regard to who draws what when.

20 And we were under the impression that as staff we
21 were still working to staff Commissioner Walkinshaw with
22 regard to the legislative proposals. It was only until
23 after the deadline that I discovered that there had been
24 more formal decisions to divide the workload.

25 Q So there was a decision to divide the workload;

1 correct?

2 A That --

3 MS. GOLDMAN: Objection, calls for
4 speculation, and lack of foundation.

5 Q (By Mr. Hughes) Sorry. I'm just trying to
6 understand the testimony you just gave.

7 Was there a decision, whether you learned about it
8 after the fact or before the fact, to divide the workload
9 among the commissioners?

10 MS. GOLDMAN: Same objection.

11 A I've read court materials and coverage after the
12 deadline that reflects a division of labor that was not
13 reflected in the work the staff was doing.

14 Q (By Mr. Hughes) Understood. Do you have any
15 reason -- Strike that.

16 And what was the division of labor that you read
17 about after the fact?

18 A That the legislative map drawing would be done by
19 Commissioners Sims and Graves, and that Commissioners Fain
20 and Walkinshaw would work on the congressional map.

21 Q Okay. So at least based on this after-the-fact
22 reporting you developed an understanding that
23 Commissioner Walkinshaw was primarily responsible for the
24 congressional maps?

25 MS. GOLDMAN: Objection, calls for

1 speculation, and lack of foundation.

2 A That's what I read.

3 Q (By Mr. Hughes) Okay. I'd like to take a look at
4 Exhibit 1 pretty quickly. And I'd like to point you to
5 the fourth bullet point, and in particular the very last
6 sentence, the fourth bullet point.

7 Do you recall Aseem asking you about this this
8 morning?

9 A Yes.

10 Q And you write here, "Since Latino voter turnout in
11 the region has been historically low, these proposal give
12 the appearance of meeting this requirements but actually
13 fails to provide" -- and I'm not going to read the rest of
14 it. I want to focus on the first part of that, "Since
15 Latino voter turnout in the region has been historically
16 low."

17 My understanding is that voter turnout is lower
18 across the board in midterm elections.

19 Is that your understanding?

20 A That's not what I'm referring to in this email.

21 Q Right, but that's what I'm asking you. Is voter
22 turnout lower across the board in midterm elections?

23 A It can vary, but yes, on the whole that's true.

24 Q But it's your understanding that Hispanic voter
25 turnout declines more sharply in midterm elections than

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1 does White turnout?

2 A Yes.

3 Q And what research did you do on this question?

4 A This is evidenced in voter turnout rates between the
5 two Senate seats that are up in alternate cycles, one
6 being up in midterms, one being up in the presidential
7 election.

8 It's based on house races and relative turnout for
9 those same seats in a midterm election versus a general --
10 general election. It's based on incredibly low turnout
11 amongst Latino voters in municipal elections. And I
12 believe all of these things have been addressed in past
13 research that's been done both within the state of
14 Washington and nationally in identifying challenges with
15 regards to Latino turnout in elections.

16 Q So when you're talking about comparing election
17 turnout are you looking at Secretary of State data to make
18 that conclusion?

19 A That's one of the places I looked, yes.

20 Q So let's start there. Does Secretary of State data
21 distinguish voter turnout by race or ethnicity?

22 A No, I believe it does it by precinct.

23 Q Okay. So you're making inferences based on
24 precincts; is that what you're saying?

25 A Yes.

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1 Q And is this in sort of a formalized fashion, or is
2 this, for lack of a better term, sort of back of the
3 envelope inferencing?

4 A I believe that research has been done that's -- Let
5 me start over.

6 There's been research done on this subject. This
7 isn't -- These comments aren't based on my own review of
8 the Secretary of State's website.

9 Q Okay. When you say there's been research on this
10 subject, is this research focused on the Yakima Valley, to
11 the best of your knowledge?

12 A Yes.

13 Q And can you point me to where this research is?

14 A I would direct you to Dr. Matt Barreto who has
15 written about this, both in his tenure at the University
16 of Washington and UCLA, as well as the turnout figures for
17 the 14th and 15th Legislative Districts that are available
18 on the Secretary of State's website.

19 Q Did you share any of this research with Commissioner
20 Walkinshaw?

21 A I summarized it for him.

22 Q Okay. Is there a communication somewhere in your
23 email that we can see you summarizing this research for
24 him?

25 A I don't know.

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1 Q Okay. You mentioned that you were relying on CVAP
2 data from the 2019 American Community Survey; correct?

3 MS. GOLDMAN: Objection, misstates the
4 testimony.

5 A Yeah, I don't remember whether it was CVAP 2020 or
6 CVAP 2019.

7 Q (By Mr. Hughes) Understood. As -- Well, I can -- We
8 can solve this problem, I think.

9 Is it your understanding that the map that was voted
10 on was 50.0 something percent Hispanic CVAP in LD 15?

11 A Yes.

12 Q Okay. So I'm going to pull up a map here for you.
13 It's going to take just a minute. And let me share screen
14 with you, if I can.

15 (Map displayed.)

16 Q All right. Are you looking at the map right now,
17 Adam?

18 A Yes.

19 Q Okay. And I am going to come over to the right side
20 here, and I'm going to do some magic. I'm going to turn on
21 CVAP 2019. I'm going to turn on CVAP 2020.

22 Okay. And I'm holding the cursor over 15. Do you
23 see that?

24 A Yes.

25 Q What is the citizen VAP 2019 for LD 15 for this?

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1 Let me ask a better question. What is the 2019
2 Hispanic CVAP for this district?

3 A 50.0.

4 Q And what is the 2022 Hispanic CVAP for this
5 district?

6 MS. GOLDMAN: 2022?

7 Q (By Mr. Hughes) Sorry. 2020 Hispanic CVAP for this
8 district.

9 A 51.5.

10 Q Does that refresh your recollection as to which year
11 CVAP you were looking at when you were evaluating these
12 districts?

13 A Yes.

14 Q And what is that refreshed recollection? Which year
15 were you looking at?

16 A I believe we were looking at 2019.

17 Q Okay. And as of 2021 when the commissioners were
18 working on these maps, were you aware that the 2019
19 CVAP -- 2019 ACS survey undercounted Hispanic CVAP?

20 A I -- If that's in reference to 2020 census data, I
21 don't believe that I was aware of that at the time. I
22 believe I saw a reporting of that later.

23 Q Let's pull out Exhibit 5. Do you still have that?
24 It's the Barreto report, if that helps.

25 And you said you read this report; correct?

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1 A Yes.

2 Q Can I ask you to go to slide 37? And do you see
3 slide 37 is titled, "Evaluating Different Maps"?

4 A Yes.

5 Q And do you see the second column is Latino CVAP '19?

6 A Yes.

7 Q And the third column is Latino CVAP now?

8 A Yes.

9 Q And do you see the Latino CVAP now column is about
10 one and a half to two and a half points higher in general
11 than the Latino CVAP '19?

12 A Yes.

13 Q So fair to say that Matt Barreto had concluded and
14 was communicating that Latino CVAP now was higher than the
15 2019 ACS CVAP you were looking at?

16 A I don't know that, actually.

17 Q Why not?

18 A The -- Any -- There were no CVAP numbers available
19 in Dave's Redistricting App for the duration of the time
20 that we were drawing the first round map that this is
21 referring to.

22 So while I don't dispute any of the figures in this
23 chart, I would just caution against making any conclusions
24 based on the CVAP numbers on the maps that we drew without
25 that information.

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1 Q Understood. I think my question is a little bit
2 different, though.

3 Matt Barreto here is saying that current CVAP, at
4 least as of the time of this report, is higher than the
5 '19 Hispanic CVAP; correct?

6 A Yes.

7 Q And this is information that was communicated to the
8 commissioners; correct?

9 A Which commissioners?

10 Q To commissioners who saw this report; correct?

11 MS. GOLDMAN: Objection, vague.

12 A Yes, this information was shared with Commissioner
13 Walkinshaw and Commissioner Sims.

14 Q (By Mr. Hughes) And this report was also shared with
15 Commissioners Fain and Graves; correct?

16 A I don't know that.

17 Q All right. Well, we need to solve that riddle here.
18 Thinking back to the map that we just looked at, do
19 you recall that the 2020 CVAP was 51.5 percent?

20 A Yes.

21 Q So the CVAP was about one and a half points higher
22 in 2020 than the 2019 numbers?

23 A Yes.

24 Q Okay. You talked a lot about whether the VRA -- and
25 when I say you talked a lot, this morning and early

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1 afternoon -- you spoke about whether the VRA required the
2 creation of a district that empowers Hispanic voters to
3 elect their candidates of choice; do you recall that?

4 A Yes.

5 Q Dr. Barreto didn't do any analysis of whether
6 Hispanic-preferred candidates would likely succeed in
7 LD 15 as drawn, did he?

8 A As drawn by who?

9 Q As approved by the Commission.

10 A I don't know.

11 Q You haven't seen any such analysis?

12 A I shared versions of 15th LD maps that were very
13 similar to the final adopted map. I do not know if they
14 were identical or not, but they were shared with him prior
15 to the deadline; and I did receive feedback from him about
16 whether or not they would comply with the federal Voting
17 Rights Act.

18 Q Did you receive feedback from him -- Well, let me
19 ask this differently.

20 Do you know whether he conducted a performance
21 analysis of any of those maps?

22 MS. GOLDMAN: Objection, calls for
23 speculation, and lack of foundation.

24 Q (By Mr. Hughes) Let me ask a better question. Did
25 he share with you any performance analyses of any of those

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1 maps that you sent him?

2 A No. I recall him summarizing his analysis of those
3 maps.

4 Q Did he perform, as far as you know, any
5 reconstituted election analyses of any of those maps?

6 A I don't know.

7 Q Have you seen any of the expert reports in this
8 case?

9 A I'm sorry. Can you restate that question?

10 Q Have you seen any of the expert reports from the
11 experts retained in this case?

12 A I'm not sure I know who all the experts are in this
13 case.

14 Q Should I take that as a no?

15 MS. GOLDMAN: Objection, asked and
16 answered.

17 Q (By Mr. Hughes) Have you seen -- Go ahead.

18 A I'm not sure what you're referring to.

19 Q Have you seen an expert report from Dr. Loren
20 Collingwood filed in this case?

21 A No.

22 Q Have you seen an expert report from Dr. John Alford
23 filed in this case?

24 A No.

25 Q Have you seen an expert report from Dr. Mark Owens

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1 filed in this case?

2 A No.

3 Q So safe to say you don't know what any of the
4 retained experts in this case have concluded about the
5 performance of LD 15?

6 A I'm not aware.

7 Q Okay. Earlier you mentioned that the House
8 Democratic Caucus didn't want to hire Matt Barreto because
9 they didn't want to split the cost; is that correct?

10 A They didn't want to split the cost. I'm not sure
11 that that was the reason why they didn't want to hire him.

12 Q That was what your testimony was, that they didn't
13 want to hire him because they didn't want to split the
14 cost; correct?

15 MS. GOLDMAN: Objection, asked and
16 answered.

17 MR. MULJI: Object to form.

18 MS. GOLDMAN: Argumentative.

19 A The conversation I had with my counterparts over in
20 the House was about whether or not they wanted to split
21 the cost of hiring Matt Barreto.

22 Q (By Mr. Hughes) Do you remember what Dr. Barreto
23 ultimately charged the Senate Democratic Caucus?

24 A I wasn't responsible for that. I have what's in my
25 emails, which is what he quoted my boss, Paulette Avalos,

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1 --

2 Q And what was that --

3 A -- for his costs.

4 Q Sorry. What was that, if you recall?

5 A I believe it was \$75,000.

6 Q And I'll represent that's my recollection as well.

7 That's a pretty significant cost; correct?

8 MR. MULJI: Object to form.

9 MS. GOLDMAN: Join.

10 A I don't know what the going rate is for VRA
11 analysis.

12 Q (By Mr. Hughes) Could you hire a new staffer for
13 \$75,000?

14 MR. MULJI: Object to form.

15 MS. GOLDMAN: Objection, calls for
16 speculation, and lack of foundation. And vague.

17 A I don't know what it costs to hire a new person in
18 the Senate.

19 Q (By Mr. Hughes) And for those \$75,000 you got a
20 slide deck and a few email consultations from Dr. Barreto;
21 is that right?

22 MR. MULJI: Objection, misstates prior
23 testimony, and object to form.

24 A Can you restate the question?

25 Q (By Mr. Hughes) And for those \$75,000 you got a

1 slide deck, maybe a few phone calls -- to be fair,
2 Aseem -- and a couple of email consultations with
3 Dr. Barreto?

4 MR. MULJI: Same objection, and
5 argumentative.

6 MS. GOLDMAN: And asked and answered.

7 A We believe that he performed the terms of his
8 contract.

9 Q (By Mr. Hughes) Whether they shared the cost or not,
10 the House Democratic Caucus did receive the benefit of
11 Dr. Barreto's analysis at essentially the same time as the
12 Senate Democratic Caucus; correct?

13 A Yes.

14 Q Did you ever provide Dr. Barreto any nonpublic
15 information about the committee's -- Strike that.

16 Did you ever provide Dr. Barreto any nonpublic
17 information about the Commission's negotiations?

18 MR. MULJI: Object to form.

19 A I shared with him the updates on negotiations to
20 receive his analysis of potential map proposals.

21 Q (By Mr. Hughes) And were those updates publicly
22 known information, or was that information that you had by
23 virtue of your position?

24 MS. GOLDMAN: Objection, compound.

25 A I was sharing them on behalf of the Senate

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1 Democratic Caucus and the Commissioner.

2 Q (By Mr. Hughes) Understood. Was that publicly known
3 information that you were sharing with Dr. Barreto?

4 A No.

5 Q Did you share with Dr. Barreto maps that had not
6 been publicly released?

7 A Yes.

8 Q Did you share with Dr. Barreto any other information
9 that had not been publicly released?

10 A I don't know. Can you restate the question?

11 Q Did you share with Dr. Barreto any other public
12 information that had not been publicly released?

13 MR. MULJI: Object to form.

14 MR. HUGHES: Did I screw that question up?

15 MR. MULJI: Yes.

16 MR. HUGHES: Okay. I appreciate your
17 honesty.

18 Q (By Mr. Hughes) Other than maps and information
19 about negotiations did you share with Dr. Barreto any
20 other information that had not been publicly released?

21 A I don't know.

22 Q Dr. Barreto works for the UCLA Voting Rights
23 Project; correct?

24 A Yes.

25 Q Did you discuss whether information that you shared

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1 with Dr. Barreto could be used in a potential lawsuit
2 brought by the UCLA Voting Rights Project?

3 A Yes.

4 Q And how did those discussions go?

5 A When first meeting with Dr. Barreto we discussed
6 that he had been in contact with individuals from
7 Washington state, and said that if we proceeded in a
8 contract with him that he would effectively create a wall
9 between conversations that he had with them and
10 conversations that he would have with us, with the
11 upstanding that he would not be sharing with them any of
12 the conversations that we had with him.

13 Q Was that important to you in contracting with
14 Dr. Barreto?

15 A Yes.

16 Q You mentioned speaking with Chad Dunn with the UCLA
17 Voting Rights Project; correct?

18 A Yes.

19 Q Did you have a similar agreement with Mr. Dunn?

20 A I don't remember if he's a party to the contract.

21 Q Was Mr. Dunn on a conference -- on a call with you
22 and Dr. Barreto in the day or days immediately prior to
23 the November 15th deadline?

24 A Yes.

25 Q Did you understand that call to be under the code of

1 silence you had or under the screen that you had
2 negotiated with Dr. Barreto?

3 A Can you restate the question?

4 Q I appreciate that. I can do it better, I think, on
5 try two.

6 Did you understand that that conversation with you
7 and Dr. Barreto and Chad Dunn and Commissioner Walkinshaw
8 was subject to the screen that you had negotiated with
9 Dr. Barreto?

10 A Yes.

11 Q So if somewhere you used -- Strike that.

12 Other than -- In the course of that call did you
13 provide Mr. Dunn with any non-public information about the
14 commissioners' negotiations?

15 A I don't recall.

16 Q Did you have any other communications with Mr. Dunn
17 over the course of your work with the UCLA Voting Rights
18 Project?

19 A I don't remember.

20 Q Did you ever discuss whether information that you
21 shared with Mr. Dunn could be used in a potential lawsuit?

22 MS. GOLDMAN: Objection, asked and
23 answered.

24 A Can you restate the question, please?

25 Q (By Mr. Hughes) Did you ever discuss whether

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1 information that you shared with Mr. Dunn could be used in
2 a potential lawsuit?

3 MS. GOLDMAN: Same objection, asked and
4 answered.

5 A With Mr. Dunn or with someone else?

6 Q (By Mr. Hughes) Either.

7 A Yes.

8 Q Can you tell me about that conversation or
9 conversations?

10 A Shortly after the redistricting deadline on
11 November 16th I conferred with my Chief of Staff Paulette
12 Avalos about waiving the terms of our confidentiality with
13 Matt Barreto, and the decision was made to waive our
14 confidentiality going forward since the deadline had
15 lapsed.

16 Q Did that decision affect the prior exchanges of
17 confidential information or just going forward?

18 A We waived confidentiality with regard to any
19 communications.

20 Q Including past communications, in other words?

21 A Yes.

22 Q And how was that memorialized?

23 A I send Matt an email and copied Paulette Avalos.

24 Q In this call with Mr. Dunn shortly before the
25 November 15th deadline do you recall anything that

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1 Mr. Dunn said in that call?

2 A No.

3 Q Do you recall him advising Commissioner Walkinshaw
4 on how to vote?

5 A No.

6 Q Do you recall him advising Commissioner Walkinshaw
7 on how to negotiate?

8 A It wouldn't surprise me, but I don't remember
9 specifics.

10 Q Why would it not surprise you?

11 A I think that the purpose of that call was for
12 Commissioner Walkinshaw to get their perspective on the
13 requirements under federal law and to talk about VRA
14 compliance, which naturally would impact how he had
15 conversations with his fellow commissioners.

16 Q And then you mentioned November 16th that you and
17 Paulette Avalos decided to waive confidentiality.

18 Is that because -- Well, is that because you were
19 considering the prospect of litigation after
20 November 16th?

21 A That was one of the factors, yeah.

22 Q Let me ask a better question.

23 Following the November 15th deadline were you
24 anticipating likely litigation about the Yakima Valley
25 districts and whether they complied with the VRA?

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1 MR. MULJI: Object to form.

2 A Can you ask the question again?

3 Q (By Mr. Hughes) Following the November 15th -- Well,
4 we don't need that qualifier.

5 Approaching and subsequent to the November 15th
6 deadline were you of the view that litigation was likely
7 about whether the Yakima Valley district or districts
8 complied with the VRA?

9 A It was not clear to me whether there would be
10 litigation once we had passed the November 15th deadline.
11 I didn't think about it in those terms prior to the
12 deadline. I was focused on what map would be adopted by
13 the Commission.

14 Q Subsequent to the deadline, the November 15th
15 deadline, did you have conversations with anyone at the
16 UCLA Voting Rights Project about litigation?

17 A Yes.

18 Q Can you tell me about those conversations?

19 A I had a couple of brief phone calls with
20 Dr. Barreto, just kind of commiserating over what had
21 happened; but we didn't talk about, you know, whether they
22 were going to immediately file, and he didn't ask me for
23 any help with the lawsuit.

24 Q Do you recall about when these conversations were?

25 A It would have been around Thanksgiving.

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1 Q Did you have any other conversations with him?

2 MS. GOLDMAN: Can we just be clear on the
3 year?

4 MR. HUGHES: What's that?

5 MS. GOLDMAN: Can we be clear on the year?

6 Q (By Mr. Hughes) Thanksgiving 2021; correct?

7 A Yes.

8 Q Do you recall any other conversations with anyone at
9 UCLA Voting Rights Project about potential litigation or
10 actual litigation?

11 A At the time I was working with Sonni Waknin on a
12 State Voting Rights Act proposal. It might have come up
13 in passing, but it wasn't something we spent a lot of time
14 talking about.

15 Q Anyone else?

16 A No.

17 Q Okay. And I've been focused on the UCLA Voting
18 Rights Project. I don't want to leave anyone else out.

19 Between the deadline, the November 15th deadline and
20 when you first received a subpoena in this case, have you
21 had communications with anyone else involved in this
22 litigation -- and I can give you names if you need them --
23 about this litigation?

24 MS. GOLDMAN: I think it would be helpful
25 for you to give him names since there is quite a long list

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1 of lawyers. So if you want him to answer about all of
2 those lawyers, please provide them -- Please provide him
3 the names.

4 A Can you clarify the timeline? It's between the
5 deadline on November 15th, 2021 and when I received the
6 subpoena?

7 Q (By Mr. Hughes) The first subpoena you received,
8 yes.

9 A Okay.

10 Q So have you communicated with anyone from Campaign
11 Legal Center about this litigation?

12 A No.

13 Q Have you communicated with anyone from Mexican
14 American Legal Defense and Educational Fund about this
15 litigation?

16 A No.

17 Q Okay. You were asked -- I'm switching gears totally
18 now. You were asked about Wapato and Toppenish and why
19 they weren't included in LD 15. Do you recall that?

20 A This morning's conversation?

21 Q I believe it was this morning. It could have been
22 early afternoon.

23 A Yes.

24 Q Are you aware that both Wapato and Toppenish are
25 part of the Yakama Reservation?

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1 A Yes.

2 Q And the Reservation is in the 14th District;
3 correct?

4 A Yes.

5 Q Does that in your mind help explain why those
6 particular cities are in the 14th with the rest of the
7 Yakama Reservation?

8 A No.

9 Q Why not?

10 A Because you could draw a district that was -- that
11 would allow Latinos to elect the candidate of their choice
12 and include the entirety of the Yakama Reservation in the
13 same LD.

14 Q Okay. But on the narrow question of -- Well, strike
15 that.

16 You could also draw a district that complied with
17 the VRA in your mind that did not include the Yakama
18 Reservation; is that right?

19 MS. GOLDMAN: Objection to the degree it
20 calls for a legal conclusion.

21 A It is my understanding that you could draw a VRA-
22 compliant district that includes parts of the Reservation.
23 I do not know whether you could draw a VRA district that
24 was exclusive of the entire Reservation.

25 Q (By Mr. Hughes) Let's pull up Exhibit 5 again, if

1 you don't mind. You know what, scratch that.

2 You said that you discussed VRA issues with Senators
3 Pedersen and Billig; correct?

4 A Yes.

5 Q Do you know whether they shared your view about
6 whether LD 15 complied with the VRA?

7 MS. GOLDMAN: Objection to the degree it
8 calls for speculation, and lack of foundation, and to the
9 degree it calls for a legal conclusion.

10 MR. HUGHES: And you know what, it's also
11 compound, so I'm going to ask it differently.

12 Q (By Mr. Hughes) Do you know if Senator Pedersen
13 shared your view about whether LD 15 complies with the
14 VRA?

15 MS. GOLDMAN: Same objections.

16 A Our caucus was supportive of a statement put out by
17 Senator Billig in the immediate aftermath that he had
18 concerns that the legislative map did not comply with the
19 federal Voting Rights Act. That comported with my
20 understanding of their position in private.

21 Q (By Mr. Hughes) Their position being Senator
22 Pedersen's position?

23 A Reflecting both of them, yes.

24 Q Okay. So I want to be sure I understand this. In
25 your view as far as you understood it, Senator Pedersen

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1 agreed with you that LD 15 did not comply with the Voting
2 Rights Act?

3 MS. GOLDMAN: Objection, misstates the
4 testimony.

5 A I believe that he reflected the same thing that
6 Senator Billig reflected publicly, which is that they had
7 significant concerns that the map was not compliant with
8 the federal Voting Rights Act.

9 Q (By Mr. Hughes) And I think that makes my next
10 question a foregone conclusion, but is it your
11 understanding that Senator Billig shared your view that
12 LD 15 did not comply with the Voting Rights Act?

13 MS. GOLDMAN: Objection, misstates the
14 testimony.

15 A Again, he publicly stated that he had significant
16 concerns that the map as adopted did not comply with the
17 federal Voting Rights Act.

18 Q (By Mr. Hughes) Okay. Do you know whether Senators
19 Pedersen and Billig voted to approve the maps?

20 A I want to be careful here because I think there's
21 been a lot of confusion around the resolution that passed
22 in the Legislature.

23 Can you ask your question again?

24 MR. HUGHES: Jeanne, do you mind reading
25 the question back?

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1 THE REPORTER: Sure. "Do you know whether
2 Senators" -- Excuse me. "Do you know whether Senators
3 Pedersen and Billig voted to approve the maps?"

4 A They did not believe they were voting to approve the
5 maps. We had several conversations internally during that
6 legislative session about what their vote constituted at
7 the time.

8 Q (By Mr. Hughes) And when you say their vote, do you
9 mean their vote on House Concurrent Resolution 44.07?

10 A Yes.

11 Q Amending -- and I'll just read the title --
12 "Amending the Redistricting Plan for State Legislative and
13 Congressional Districts;" correct?

14 A Yes.

15 Q And as far as you understand it, HCR 44.07 is what
16 made the Legislative Districts that the Commission adopted
17 as amended the law of the state of Washington; correct?

18 A I would not actually characterize it that way.

19 Q How would you characterize it?

20 A The Legislature is granted the opportunity to amend
21 the legislative plan so long as no district changes more
22 than 2 percent. The statute says that the maps shall be
23 finalized after that opportunity, but it can be finalized
24 if they took no vote at all.

25 So we discussed at length whether or not it made

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1 sense to approve a resolution amending the map because of
2 the exact nature of this concern that we would somehow --
3 that the members of the caucus would somehow be seen as
4 approving the map by virtue of their vote.

5 Q And the statute you just referred to, RCW 44.05 --
6 correct?

7 A Yes.

8 Q -- also empowers the Legislature to reconstitute the
9 Redistricting Commission; correct?

10 A Upon a two-thirds vote of both chambers, yes.

11 Q Okay. And that was not the decision that the
12 Legislature made; correct?

13 A Yes.

14 Q Okay. Instead Senators Pedersen and Billig voted to
15 approve an amended version of the map; correct?

16 MR. MULJI: Objection to form.

17 MS. GOLDMAN: Objection, asked and
18 answered, and argumentative.

19 A Again, they believed at the time -- and I believe
20 that a proper reading of the law is -- that they did not
21 approve the map. They amended the map. That is the only
22 constitutional role granted to them in redistricting.

23 Q (By Mr. Hughes) Do you follow Senate elections in
24 Washington state pretty closely?

25 A Yes.

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1 Q If I asked you to -- and I'm not asking you to. If
2 I asked you to could you name every sitting Washington
3 State Senator?

4 A I'd probably miss a couple.

5 Q Well, good thing I won't ask you to because I
6 wouldn't want that to be public record.

7 Do you know who Nikki Torres is?

8 A Yes.

9 Q Who is Nikki Torres?

10 A Nikki Torres is the Senator-elect from the 15th
11 Legislative District.

12 Q Do you know who Lindsey Keesling is?

13 A No.

14 Q You follow Senate elections pretty closely in the
15 state of Washington; correct?

16 MS. GOLDMAN: Objection, asked and
17 answered.

18 A Yes.

19 Q (By Mr. Hughes) Lindsey Keesling was not someone who
20 rated -- Sorry. That was a bad question. I'll start over
21 again.

22 Notwithstanding your clearly vast knowledge of
23 Senate elections, you didn't know the name of the person
24 who was running against Nikki Torres in LD 15?

25 MS. GOLDMAN: Objection, asked and

1 answered, and argumentative.

2 A This was a write-in candidate; right?

3 Q (By Mr. Hughes) I'm asking you.

4 A I don't -- I don't remember.

5 MS. GOLDMAN: If you know.

6 Q (By Mr. Hughes) So your understanding is that
7 Lindsey Keesling is a write-in candidate?

8 A I was aware that there was a write-in candidate in
9 the 15th Legislative District.

10 Q Is it safe to say that if Lindsey Keesling -- and I
11 mean this with all due respect to Ms. Keesling -- were a
12 serious candidate, you would know who she was?

13 MS. GOLDMAN: Objection, calls for
14 speculation.

15 A I'm going to ask you to restate the question.

16 Q (By Mr. Hughes) Is it fair to say -- and I mean this
17 with all due respect to Ms. Keesling -- that if she were a
18 serious candidate, if she were seriously contending for
19 LD 15, you would know who she was?

20 MS. GOLDMAN: Same objection.

21 A Yes.

22 Q (By Mr. Hughes) Do you believe that Lindsey
23 Keesling was a serious contender for LD 15?

24 MS. GOLDMAN: Objection, calls for
25 speculation, lack of foundation.

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1 A I don't know anything about the woman who ran as a
2 write-in candidate. I believe that any Democrat running
3 in that district was unlikely to succeed in the election.

4 Q (By Mr. Hughes) Do you know whether Ms. Keesling
5 raised any money?

6 A I do not.

7 Q Do you know whether she had Twitter presence?

8 MS. GOLDMAN: Had what?

9 MR. HUGHES: Twitter presence.

10 A I do not.

11 Q (By Mr. Hughes) If someone were a serious candidate,
12 do you expect they would have raised a significant sum of
13 money?

14 A Can you ask that question differently?

15 Q It's all right.

16 MR. HUGHES: I'm going to actually --
17 That's all I have for you.

18 MS. GOLDMAN: Let's take a break.

19 MR. BOWEN: Okay. Five minutes?

20 MS. GOLDMAN: Thank you.

21 (Break 4:19 p.m. to 4:24 p.m.)

22 (Discussion off the record.)

23 MR. BOWEN: I'm going to try to keep this
24 very short. If we are back on the record, I'll get
25 started.

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1 THE REPORTER: Back on the record.

2 MR. BOWEN: All right. Thank you, Jeanne.

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

4 BY MR. BOWEN:

5 Q Okay. Earlier, Mr. Hall, you said that -- and I'm
6 paraphrasing -- that candidates of choice for Latinos
7 could be a candidate of any racial or ethnic group; is
8 that correct?

9 A Yes, that's my understanding.

10 Q Okay. Is it also your understanding that they could
11 be from any political party?

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

14 A I'm going to hesitate to answer that question
15 because I'm not sure. I want to say I don't know because
16 I don't want to misstate the law.

17 MR. BOWEN: Okay. I'm going to drop an
18 exhibit in the chat. I apologize that I'm not here to
19 have handouts for you guys, but it should be very short.
20 So let me know when this comes through.

21 (Hall Exhibit No. 18 introduced.)

22 MR. BOWEN: And if someone can -- once you
23 get it and are able to download it, let me know; and I can
24 screen share as well to make it easier.

25 THE REPORTER: You can save it to the

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1 desktop if you want to.

2 THE WITNESS: Okay. I'm not sure it's
3 going to let me.

4 Does someone else have the ability to screen share?

5 MR. BOWEN: If it's showing up in the chat,
6 I can just screen share and walk through it; and if it's
7 placed in the chat for the record is everybody okay with
8 that?

9 MS. GOLDMAN: Yes.

10 MR. HUGHES: Yes, please.

11 MR. BOWEN: Okay. Perfect.

12 Q (By Mr. Bowen) So right here I'm showing that I'm
13 on the Secretary of State's website. This is a picture of
14 the website. Is that what you're seeing?

15 A Yes.

16 Q Okay. And this is from the November 8, 2020 general
17 election; is that correct? Sorry, 2022. My apologies.

18 A Yes.

19 Q So this would be under the maps that were enacted or
20 the map that was enacted in 2021; correct?

21 A Yes.

22 Q Okay. And this is the result for Legislative
23 District 15. Is that what you're seeing, also?

24 A Yes.

25 Q All right. And this indicates the State Senate race

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1 for Legislative District 15 where I'm dragging my cursor
2 right here. Is that what you're seeing as well?

3 A Yes.

4 Q Okay. And there was some discussion earlier of
5 Nikki Torres and her race for Legislative District 15.

6 Are you seeing that there are currently three
7 candidates here in Legislative District 15?

8 A Sorry. I only see two.

9 Q My apologies. I see Nikki Torres. Do you see that?

10 A Yes.

11 Q Okay. And then Lindsey Keesling?

12 A Yes.

13 Q And then a write-in candidate who received about a
14 quarter of a percent of a vote. Is that what you're
15 seeing?

16 MR. HUGHES: Object to form.

17 A I don't know if that was one person or several, but
18 yes, I see the line for write-in candidates.

19 Q (By Mr. Bowen) Okay. Fair enough.

20 Nikki Torres, what political party does she identify
21 with?

22 MS. GOLDMAN: I'm going to object to the
23 degree it calls for speculation, other than the fact that
24 you're asking him to read to you what you downloaded from
25 the Secretary of State's website.

1 A The screen says prefers Republican party.

2 Q (By Mr. Bowen) Okay. And she won a little over
3 67 percent of the vote; is that correct?

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

6 A That's what this says, yes.

7 Q (By Mr. Bowen) Okay. And based on discussions
8 earlier, the map that was enacted had just over a
9 50 percent Hispanic CVAP; is that correct?

10 MS. GOLDMAN: Objection, misstates the
11 testimony.

12 A Can you restate the question?

13 Q (By Mr. Bowen) Sure. You were discussing just a
14 moment ago with Mr. Hughes that under the map as enacted
15 the Hispanic CVAP according to the census data in 2020 was
16 about 51.5 percent; is that correct?

17 MS. GOLDMAN: Objection, misstates the
18 testimony and evidence.

19 You can answer.

20 A If I understand your question, yes.

21 Q (By Mr. Bowen) Okay. So then in order for
22 Ms. Torres to garner 67 percent of the vote in a district
23 that is composed of roughly 51 percent Hispanic CVAP, she
24 would have to garner a large chunk of the Hispanic vote;
25 is that correct?

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1 MR. MULJI: Object to form.

2 MR. HUGHES: Objection, incomplete
3 hypothetical, and calls for speculation.

4 MS. GOLDMAN: Lack of foundation.

5 A Yeah, I -- I don't know. I don't feel comfortable
6 that I have the expertise to answer that.

7 MR. BOWEN: All right. We'll let it be. I
8 don't have any other questions.

9 Thank you for your time today, Mr. Hall.

10 MS. GOLDMAN: Okay.

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

12 BY MR. MULJI:

13 Q I just have a couple of questions.

14 A Okay.

15 Q Maybe just one, actually. I'm going to share my
16 screen with you. There was some discussion about
17 Lindsey Keesling in the last couple rounds of questioning.

18 You had mentioned that you had heard that she may
19 have been a write-in candidate; is that right?

20 A What I understand is that there was only one
21 declared candidate for the Senate seat at the end of
22 filing week, so that she was not a candidate who filed to
23 run for that seat in May of 2021.

24 Q I see. Okay. And during the primary election do
25 you know if Lindsey Keesling was on the ballot?

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1 MS. GOLDMAN: Objection, calls for
2 speculation, and lack of foundation.

3 A She was not -- She did not file for the Senate race,
4 but I believe she sought to get into the race as a
5 write-in candidate in the August primary.

6 Q Okay. Let me just share my screen real quick.

7 (Website displayed.)

8 Q I'll represent to you that I'm showing you the
9 Secretary of State's website and the results from the
10 August 2nd, 2022 primary. I'm scrolling down to the
11 results from Legislative District 15 State Senate race.

12 Do you see any election results for a named
13 candidate Lindsey Keesling?

14 A No.

15 Q Is it your assumption that perhaps the write-in --
16 that she might have been the write-in candidate?

17 A Yes.

18 MS. GOLDMAN: Objection, calls for
19 speculation, and lack of foundation.

20 Q (By Mr. Mulji) To that point do you know?

21 A That is my understanding is that she was a write-in
22 candidate for -- in the August primary; and the fact that
23 she appeared on the November ballot is likely to mean that
24 she received enough votes as a write-in candidate to
25 appear on the November ballot.

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1 Q That she received in this election -- Well, is it
2 clear how many votes she received from these results?

3 MS. GOLDMAN: And again, I want to object
4 because we are mixing elections here, the primary and
5 general.

6 MR. MULJI: Sure.

7 MR. BOWEN: I would like to join.

8 Q (By Mr. Mulji) In this primary election she doesn't
9 appear -- Her name doesn't appear on this ballot, does it?
10 Or it doesn't appear in the results.

11 A Reading these results, I would conclude that she
12 received between one and 630 votes as a write-in candidate
13 in the August primary.

14 MR. MULJI: Okay. That's all.

15 MS. GOLDMAN: That's it? You're done?

16 MR. MULJI: I'm sorry. That is it. I'm
17 done. Thank you.

18 MS. GOLDMAN: All right. Good evening.
19 We'll reserve signature, Jeanne.

20 (Deposition concluded at 4:32 p.m.)

21 (Signature reserved.)

22

23

24

25

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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 6th day of January, 2023.

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, ADAM HALL, 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: Adam Hall
 Soto Palmer, et al. v. Hobbs, et al.
 21 USDC Western District of Washington
 Cause No. 3:22-cv-05035-RSL
 22 Date: December 19, 2022

23 Reported by: Jeanne M. Gersten, RDR, CCR No. 2711
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