

# **Deposition of Benancio Garcia III**

**Garcia III v. Hobbs, et ano. / Palmer v. Hobbs, et al.**

**February 3, 2023**



**206.287.9066 | 800.846.6989**

1325 Fourth Avenue, Suite 1840, Seattle, Washington 98101

[www.buellrealtime.com](http://www.buellrealtime.com)

email: [info@buellrealtime.com](mailto:info@buellrealtime.com)



Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BENANCIO GARCIA III, )  
)  
Plaintiff, )  
v. ) No. 3:22-cv-5152-RSL

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

and )

SUSAN SOTO PALMER, et al., )  
)  
Plaintiffs, )  
v. ) No. 3:22-cv-5035

SECRETARY OF STATE STEVEN )  
HOBBS, in his official )  
capacity as Secretary of State )  
of Washington, et al. )  
)  
Defendants. )

VIDEOCONFERENCE DEPOSITION UPON ORAL EXAMINATION OF

BENANCIO GARCIA III

Tacoma, Washington

(All participants appeared via videoconference.)

DATE TAKEN: FEBRUARY 3, 2023

REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

Page 3

1 APPEARANCES (Continuing)  
2 FOR PLAINTIFFS IN CASE NO. 3:22-cv-5035:  
3 SONNI WAKNIN  
4 UCLA Voting Rights Project  
5 3250 Public Affairs Building  
6 Los Angeles, CA 90095  
7 310.400.6019  
8 Sonni@uclavrp.org

9 FOR DEFENDANTS IN CASE NOS. 3:22-cv-5152-RSL and  
10 3:22-cv-5035:

11 ANDREW HUGHES  
12 ERICA R. FRANKLIN  
13 Assistant Attorney General  
14 Complex Litigation Division  
15 800 Fifth Avenue  
16 Suite 2000  
17 Seattle, WA 98104  
18 206.464.7744  
19 andrew.hughes@atg.wa.gov  
20 erica.franklin@atg.wa.gov

21 \* \* \* \* \*

Page 2

1 APPEARANCES  
2 FOR PLAINTIFF IN CASE NO. 3:22-cv-5152-RSL and  
3 INTERVENOR DEFENDANTS IN CASE NO 3:22-cv-5035:

4 ANDREW R. STOKESBARY  
5 Chalmers, Adams, Backer & Kaufman, LLC  
6 1003 1/2 Main Street  
7 Suite 5  
8 Sumner, WA 98390-1444  
9 206.207.3920  
10 dstokesbary@chalmersadams.com

11 FOR PLAINTIFFS IN CASE NO. 3:22-cv-5035:

12 MARK P. GABER  
13 ASEEM MULJI  
14 BEN PHILLIPS  
15 Campaign Legal Center  
16 1101 14th Street NW  
17 Suite 400  
18 Washington, DC 20005  
19 202.736.2200  
20 mgaber@campaignlegal.org  
21 ANNABELLE HARLESS  
22 Campaign Legal Center  
23 55 W. Monroe Street  
24 Suite 1925  
25 Chicago, IL 60603  
aharless@campaignlegal.org

ERNEST HERRERA  
Mexican American Legal Defense and  
Educational Fund  
643 South Spring Street  
11th Floor  
Los Angeles, CA 90014  
213.629.2512  
eherrera@maldef.org  
EDUARDO MORFIN  
Morfin Law Firm  
732 North Center Parkway  
Kennewick, WA 99336-8100  
509.380.9999  
Eddie@MorfinLawFirm.com

Page 4

# DEPOSITION OF BENANCIO GARCIA III EXAMINATION INDEX

EXAMINATION BY:	PAGE
Mr. Hughes	5
Mr. Gaber	50
Mr. Hughes	105
Mr. Stokesbary	106

EXHIBIT INDEX	PAGE
EXHIBITS FOR IDENTIFICATION	
(No exhibits marked for identification.)	

1 (Pages 1 to 4)

Page 5

TACOMA, WASHINGTON; FEBRUARY 3, 2023

9:09 a.m.

-o0o-

BENANCIO GARCIA III, witness herein, having been  
first duly sworn on oath,  
was examined and testified  
as follows:

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

BY MR. HUGHES:

**Q. Good morning, Mr. Garcia. I know we met just very briefly off the record, but I'm Andrew Hughes. I represent State of Washington in this matter.**

**Do you mind just stating your name for the record, please?**

A. Yes. Benancio Garcia III.

**Q. And what's your address, for the record?**

A. Physical address?

**Q. Yes, please.**

A. 311 Birch Avenue, Grandview, Washington 98930.

**Q. And that's in Yakima County?**

A. Yes, it is.

**Q. Have you recently moved?**

A. Yes. It's still in Yakima County because I had a house fire. So I moved five times during that transition.

Page 7

didn't -- I felt he didn't honor the deal, and then we ended up settling for --

**Q. That was auto bodywork?**

A. Yeah, auto bodywork.

**Q. And about how long was -- go ahead. Sorry.**

A. Oh, I can't recall exactly how long ago, but I was with the military at the time, and it was after I had just returned from Iraq.

**Q. Okay.**

A. And --

**Q. I'd like to go over -- go ahead. Sorry.**

A. -- the second time was, I took a -- a deposition done, and it was a private matter, and I settled the case.

**Q. And about how long ago was that?**

A. I'm sorry. I'm trying to recall. Maybe 2013, '15, somewhere.

**Q. Okay. So it sounds like you've done this before, and probably know the rules, but I do want to just go over a few quick, you know, guidelines that will hopefully make this go as smoothly as possible.**

**You understand this is being recorded by a court reporter, so we need verbal answers.**

**That make sense?**

A. Yes.

Page 6

**Q. Gosh. What was your most recent permanent address?**

A. Oh, my goodness. I want to say -- I believe -- 822 Olmstead Road, Grandview, Washington 98930.

**Q. Okay. And I guess what I'm trying to ask is, what was the address of the house that burned down?**

A. Oh, 311 Birch Avenue. It didn't completely burn down, but quite a bit of fire damage was done.

**Q. Gosh. I'm sorry to hear that.**

A. Thank you.

**Q. And that's all in the legislative district -- let me -- strike that.**

**You live in Legislative District 13 -- 15?**

A. 15.

**Q. 15. And you've lived there during the course of this moving because of the house fire?**

A. Yes.

**Q. Okay. Mr. Garcia, have you ever been deposed before?**

A. Yes.

**Q. Can you tell me about that?**

A. I was de- -- I was deposed many years ago when I was with the military because of a business transaction where I needed to get bodywork done, and we had agreed upon a certain price, and we didn't -- he

Page 8

**Q. So no nodding, no shaking the head, etc.**

**And because there's a court reporter taking everything down, we can't talk over each other.**

**Understood?**

A. Yes.

**Q. So I'll try and wait until you're done speaking to ask my next question, and vice versa.**

**Does that work?**

A. Yes.

**Q. And you also understand that you're under oath here?**

A. Yes.

**Q. If I ask you a question and you don't understand it, can you please ask me to clarify that?**

A. Yes.

**Q. Okay. I just want to be sure that you understand the questions I'm asking, and that your answers actually go to the questions that I'm asking. Okay?**

A. Yes.

**Q. I don't anticipate we'll be here all that long, but if you do need a break at any time, you should feel free to ask for one. I'd just ask that, if there's a question pending, you answer that question before taking a break. Okay?**

2 (Pages 5 to 8)

Page 9

1 A. Yes.

2 **Q. Now, Mr. Garcia, is there any reason you can't**  
 3 **give full, accurate, and truthful testimony here today?**

4 A. No.

5 **Q. You're not sick or taking any medications or**  
 6 **anything like that, that affect your memory or your**  
 7 **cognitive function?**

8 A. No.

9 **Q. Okay. Your attorney might at some point object**  
 10 **to my questions. Those objections are mostly just for**  
 11 **the record. So unless Mr. Stokesbary tells you not to**  
 12 **answer, you still need to answer my question.**

13 Does that make sense?

14 A. Yes.

15 **Q. Okay. Mr. Garcia, what did you do to prepare**  
 16 **today for this deposition?**

17 A. I didn't prepare for this deposition.

18 **Q. You didn't have any meetings with Counsel?**

19 A. Well, we spoke about -- a little bit about me  
 20 showing up, and not so much showing up, but doing a  
 21 Zoom. But I was already here, so I really didn't have  
 22 much to say.

23 Most of my information came in, was through the  
 24 subpoena. So that's why I planned to be here and didn't  
 25 have a laptop and expected to be here at this location

Page 10

1 that I feel awkward about.

2 **Q. Understood. I do apologize for that.**

3 **Did you speak with anyone besides**  
 4 **Mr. Stokesbary about this deposition?**

5 A. Yes. The attorney that's right here that I'm  
 6 using the office for because we were both confused.

7 **Q. Fair.**

8 **Did you review any documents in preparation for**  
 9 **this deposition?**

10 A. Other than what my attorney, Drew Stokesbary,  
 11 had -- we'd written in the Complaint versus Steve Hobbs.

12 **Q. Fair enough.**

13 **Mr. Garcia, what do you do for a living right**  
 14 **now?**

15 A. I'm retired military.

16 **Q. Okay. And what did you do before you retired**  
 17 **from the military? No. That was a -- that was a**  
 18 **foolish question.**

19 **How long were you in the military, Mr. Garcia?**

20 A. I was in the military from -- active duty  
 21 part -- 2003 to 2008.

22 **Q. And what did you do after you retired from the**  
 23 **military in 2008?**

24 A. I worked for a nonprofit, then worked for the  
 25 federal government.

Page 11

1 **Q. And do you still work for the federal**  
 2 **government?**

3 A. No.

4 **Q. When did you stop working for the federal**  
 5 **government?**

6 A. In April of 2019.

7 **Q. So now you're just enjoying retirement?**

8 A. I ran for U.S. Congress. That's why I left the  
 9 federal government.

10 **Q. And what party did you run -- well, let me back**  
 11 **up.**

12 **Which congressional district did you run from?**

13 A. 4th Congressional District.

14 **Q. That's federal congress; correct?**

15 A. Correct.

16 **Q. And what party did you run as?**

17 A. Republican.

18 **Q. And why did you choose to run for congress,**  
 19 **Mr. Garcia?**

20 A. Because I believe in protecting our  
 21 constitution as it was written, and I've served in  
 22 combat to protect those rights, and I truly believe in  
 23 the American dream.

24 And I believe, in my life history, being Ebony  
 25 Senate rep in college, being part of LULAC, being part

Page 12

1 of the Republican National Hispanic Assembly, I believe  
 2 that we should all have fair representation according to  
 3 our laws.

4 **Q. And what does that mean, "fair representation**  
 5 **according to our laws"?**

6 A. Fair representation meaning to me, like in our  
 7 4th Congressional District, we are largely a  
 8 Latino-based district, and it would only make sense that  
 9 leadership qualities in the sense of the district  
 10 population, that you would see a fair number of Latino  
 11 representation. But whether it's on the other side of  
 12 the mountains, if it's the Vietnamese district, or  
 13 Russian district, you would see fair representation.

14 **Q. Okay. And why did you feel like you were the**  
 15 **right person to represent the people in the 4th**  
 16 **Congressional District?**

17 A. I grew up there. I was born there. I  
 18 understand our culture there. We're a rural area. I've  
 19 been able to make a difference in approximately 1,000  
 20 households being homeowners when I worked for the  
 21 federal government.

22 So there are over 1,000 people, families, that  
 23 don't know I'm the reason why they're a homeowner. I've  
 24 done many, many non- -- hours, like with AmeriCorps.  
 25 I've worked in Granger High School. I am 51 years old,

3 (Pages 9 to 12)

Page 13

1 and I have -- I always believe in a life of service.  
 2 And so my heart leads me to my desires, and that is to  
 3 make a difference for our community and our country, and  
 4 that's what I've been able to do in my -- my 51 years.

5 **Q. That sounds fantastic.**

6 **You mentioned -- I didn't get the name of it,**  
 7 **sorry, the Republican Hispanic -- some organization you**  
 8 **were part of?**

9 A. Yes. The Republican National Hispanic  
 10 Assembly.

11 **Q. And what is the Republican National -- oh, go**  
 12 **ahead. Sorry.**

13 A. I'm sorry. It was founded in 1967, and it was  
 14 to get more of the Latino population organized to help  
 15 them get registered to vote. And I truly believe it  
 16 doesn't matter which party it is, that registration for  
 17 every American is truly important. That's why I fought  
 18 for the rights for us to be free.

19 **Q. And you also mentioned being a member of LULAC.**  
 20 **What's LULAC?**

21 A. Yes, Legal United Latin American Citizens. I  
 22 was the secretary when it was founded, I want to say, in  
 23 2026 in Granger, Washington.

24 **Q. And why did you choose to be a part of LULAC?**

25 A. There are many unregistered voters, and I

Page 14

1 wanted to be part of a Latino organization that has a  
 2 good history, and also be part of getting people  
 3 registered to vote. I strongly believe that our voting  
 4 rights are so critical to each American.

5 **Q. I think you touched on this a bit earlier, but**  
 6 **why is it important, in your view, that people be**  
 7 **represented by someone who shares their -- their life**  
 8 **experiences or understands their culture?**

9 MR. STOKESBARY: Objection as to form.

10 A. Well --

11 BY MR. HUGHES:

12 **Q. You can answer.**

13 A. Could you repeat the question one more time?

14 **Q. Yeah. I said -- I think you touched on this**  
 15 **earlier, but why is it so important that people be**  
 16 **represented by a representative who understands their**  
 17 **culture and shares their life experiences?**

18 A. I think it's important that when you share  
 19 cultural experiences, that you relate to them why it's  
 20 so important to vote. It's just having something in  
 21 common.

22 **Q. Mr. Garcia, how did you get involved in this**  
 23 **lawsuit?**

24 A. I got involved in this lawsuit by a phone call  
 25 from someone I'd known in the political realms and also

Page 15

1 the fact of what was being stated on the redistricting  
 2 lines, you know, so it caught my attention. The Yakima  
 3 Herald one, and then another friend.

4 But when I realized the redistricting lines  
 5 were not of my personal -- I believe are based on  
 6 illegal gerrymandering and based on race, and I don't  
 7 agree with that.

8 **Q. Who was it who called you?**

9 A. I didn't know her very well. I met her at a --  
 10 a -- gosh. I'm trying to remember her name right now.  
 11 I -- I can't recall her name at this point. But I met  
 12 her at a political event with both parties. So it was  
 13 both parties event, both Democrats and Republicans in, I  
 14 want to say, the Bellevue area. So -- and what was  
 15 written, like I said, in the Yakima Herald.

16 **Q. So this person called you out of the blue,**  
 17 **looking for a plaintiff for this lawsuit; is that right?**

18 A. Well --

19 MR. STOKESBARY: Objection as to form.

20 BY MR. HUGHES:

21 **Q. You can answer, Mr. Garcia.**

22 A. You know, I must have made an impression.  
 23 That's all I can say because I had only met her once.  
 24 So I can't even say a friend, only because I -- I met  
 25 her once, so, you know...

Page 16

1 **Q. I just want to be clear. Yes, this person**  
 2 **called you, recruiting a plaintiff for this lawsuit?**

3 A. Let me know about the situation, which was, you  
 4 know -- let me know about the situation and it may be  
 5 something I may want to be involved in. I'm trying to  
 6 recall the whole -- the conversation. It's been a  
 7 little while.

8 **Q. Do you recall what organization this person was**  
 9 **with?**

10 A. Actually, she had ran for the state position  
 11 for OSPI. I'm just forgetting her name.

12 **Q. Was it Maia Espinoza?**

13 A. That's correct.

14 **Q. So Ms. Espinoza reached out to you about**  
 15 **potentially serving as a -- a plaintiff in this lawsuit?**

16 A. Well, no. She didn't say personally, but she  
 17 said that I may be interested, and she didn't have much  
 18 details, but we had talked a little bit because I was  
 19 interested in her brochure that she had also.

20 **Q. What about her brochure?**

21 A. It was about getting people to vote.

22 **Q. And about when did Ms. Espinoza call you?**

23 A. I can't recall. It's been a little while.

24 **Q. Did you follow the redistricting process as it**  
 25 **was happening?**

4 (Pages 13 to 16)

Page 17

1 A. I do.  
 2 **Q. Sorry. You do, or you did?**  
 3 A. No, I do.  
 4 **Q. So did you ever submit any comments to the**  
 5 **Redistricting Commission about any maps?**  
 6 MR. STOKESBARY: Objection as to form.  
 7 BY MR. HUGHES:  
 8 **Q. When Mr. Stokesbary says objection as to form,**  
 9 **you can still answer the question, Mr. Garcia.**  
 10 MR. STOKESBARY: Yeah. Sorry for the  
 11 confusion. The only time you don't need to answer, I  
 12 will make it very clear, and it will be when it involves  
 13 attorney-client privileged communication between us, but  
 14 otherwise I'll just say it for the record, and then you  
 15 can go ahead and answer anyway.  
 16 THE WITNESS: Thank you. Thank you, sir.  
 17 BY MR. HUGHES:  
 18 **Q. So let me back up and re-ask the question in**  
 19 **light of that interruption -- "interruption." I use the**  
 20 **term not pejoratively at all.**  
 21 **Mr. Garcia, did you ever submit any comments to**  
 22 **the Redistricting Commission?**  
 23 A. I don't know if I -- I don't recall if I did  
 24 submit comments. I know I have made comments about it.  
 25 **Q. To whom did you make comments about it?**

Page 18

1 A. As I ran for congress. So I may give a speech  
 2 here and there.  
 3 **Q. I hear you. I'm asking about the period during**  
 4 **which the Redistricting Commission was doing their work,**  
 5 **so from about March of 2021 to November 15th of 2021.**  
 6 **Does that make sense?**  
 7 A. Yes. You would see it filed in my Complaint  
 8 with my lawyer.  
 9 **Q. So during the time in which the Redistricting**  
 10 **Commission was drafting the current legislative plan,**  
 11 **did you ever submit any comments through their website**  
 12 **or through email or anything like that?**  
 13 A. That I recall, no.  
 14 **Q. Did you ever propose any redistricting plans?**  
 15 A. I did not --  
 16 MR. STOKESBARY: Sorry. Same objection as  
 17 to form.  
 18 A. What you would see is my objections on the  
 19 Complaint that was filed.  
 20 BY MR. HUGHES:  
 21 **Q. Did you ever attend any meetings of the**  
 22 **Redistricting Commission?**  
 23 A. No.  
 24 **Q. During the time that the commission was doing**  
 25 **its work, what was your impression of the work they were**

Page 19

1 **doing, if any?**  
 2 A. From the Complaint that was sent, I was not  
 3 very pleased whatsoever.  
 4 **Q. What do you mean, "from the Complaint that was**  
 5 **sent"?**  
 6 A. That I filed, the lawsuit that I filed. It  
 7 also was attached, the redistricting zones that had  
 8 occurred throughout the process of the voting.  
 9 **Q. Mr. Garcia, did someone send you a Complaint**  
 10 **before you agreed to be a plaintiff in this lawsuit?**  
 11 A. No.  
 12 **Q. Okay. So you didn't see a Complaint until you**  
 13 **had agreed to be a plaintiff?**  
 14 A. I had already -- so repeat that again.  
 15 **Q. You did not see a Complaint in this matter**  
 16 **until you had agreed to become a plaintiff?**  
 17 A. Not from -- no, no.  
 18 **Q. You started saying "not from." Is there more**  
 19 **to --**  
 20 A. No, no. I'm sorry. I had -- I had not -- like  
 21 from -- the Complaint right now, why I am doing this  
 22 deposition, I was unaware of any other cases. So I  
 23 mean -- any other Complaints that were legal, you know,  
 24 brought against Steve Hobbs.  
 25 **Q. I guess I'm asking a different question.**

Page 20

1 **Did you see a copy of the Draft Complaint that**  
 2 **was filed in this matter before you agreed to become a**  
 3 **plaintiff in this matter?**  
 4 A. I saw a copy, yes, I did, of my Complaint, but  
 5 not of the one that we're doing the deposition on.  
 6 **Q. So to be clear, this deposition that I'm taking**  
 7 **right now is in the matter of Garcia v. Hobbs.**  
 8 **Do you understand that?**  
 9 A. Okay. No. I thought it was under the matter  
 10 of Susan Soto Palmer.  
 11 **Q. That's why typically an attorney would start a**  
 12 **deposition by showing you the dep notice, but, you know,**  
 13 **I play by my own rules.**  
 14 **So okay. Knowing now that we are --**  
 15 A. That's -- that's why I'm confused, when I'm  
 16 talking my Complaint, I know what my Complaint is, but I  
 17 have not seen anyone else's Complaint. I'm sorry.  
 18 **Q. Understood. No, no need to apologize.**  
 19 **So did you see the Complaint in the case that**  
 20 **became Garcia v. Hobbs before you agreed to become a**  
 21 **plaintiff?**  
 22 A. I seen -- I seen the Complaint first, yes.  
 23 **Q. And who sent you that Complaint?**  
 24 A. That was my lawyer.  
 25 **Q. Mr. Stokesbary?**

5 (Pages 17 to 20)



Page 21

1 A. Yes.  
 2 **Q. Okay. When do you first recall seeing the**  
 3 **final maps proposed by the Redistricting Commission?**  
 4 A. You know, the final maps, once my Complaint was  
 5 put in, there was still quite a bit of -- as you can see  
 6 in the Yakima Herald, still a lot of issues on  
 7 determining when those maps were going to be completely  
 8 adjudicated through the State. So that, you know,  
 9 through the -- my election process, it -- it wasn't  
 10 until much later. My Complaint came first.  
 11 **Q. Had you seen the final maps then before you**  
 12 **filed your Complaint?**  
 13 A. They -- the -- the final maps that were  
 14 proposed, they -- they -- you know, I had seen the final  
 15 maps, I guess, would be yes.  
 16 **Q. So you had seen the final maps before you filed**  
 17 **your Complaint; is that -- I'm understanding?**  
 18 A. Yes. Because there was -- the representative  
 19 for 15th District was no longer going to be running at  
 20 that time, or moving to a new location.  
 21 **Q. And when do you recall seeing the final maps**  
 22 **for the first time?**  
 23 A. I want to say, oh, my goodness, in the summer  
 24 last year.  
 25 **Q. So the summer of 2022 was the first time you**

Page 22

1 **saw the final maps?**  
 2 A. Yeah. The final maps, yeah.  
 3 **Q. What was your impression of those maps when you**  
 4 **saw them?**  
 5 A. I was not -- I was not pleased.  
 6 **Q. And why not?**  
 7 A. Because it was based on racial gerrymandering  
 8 on the legal district, in my opinion.  
 9 **Q. And what was the basis for your opinion?**  
 10 A. According to the other maps I had seen, it was  
 11 just based on racial gerrymandering, illegal  
 12 gerrymandering.  
 13 **Q. What makes you think the maps were racially**  
 14 **gerrymandered?**  
 15 A. They were drawn up very --  
 16 MR. STOKESBARY: Sorry. Objection to the  
 17 extent that calls for a legal conclusion.  
 18 BY MR. HUGHES:  
 19 **Q. You can answer.**  
 20 A. Well, let me -- give me one moment.  
 21 The maps cross over from re- -- recalling three  
 22 different counties. There is no particular freeway  
 23 boundary that's on there. They were very unusual than  
 24 any other map. Also the large population that was drawn  
 25 was basically Hispanic, and they didn't make sense to

Page 23

1 me.  
 2 **Q. Mr. Garcia, I think I saw you open a binder or**  
 3 **flipping a binder while you answered that question.**  
 4 **What do you have in front of you right now?**  
 5 A. My Complaint.  
 6 **Q. Anything else?**  
 7 A. No.  
 8 **Q. Okay.**  
 9 A. My Complaint.  
 10 **Q. Fair. So --**  
 11 A. Oh, the subpoenas. The subpoenas. Because I  
 12 needed to know the location. So I just have the  
 13 subpoenas and my Complaint and my legal letter of  
 14 agreement with my attorney. That is all I have.  
 15 **Q. Understood.**  
 16 **So what about the shape of the district, the**  
 17 **lack of a freeway boundary, the things you just**  
 18 **mentioned, what about that indicated to you that this**  
 19 **was a racially gerrymandered district?**  
 20 A. Well --  
 21 MR. STOKESBARY: Objection to the extent  
 22 that calls for a legal conclusion.  
 23 A. Well, I have seen many maps in my lifetime.  
 24 I've done many home loans for the federal government.  
 25 I've been trained for community facilities for the

Page 24

1 federal government. So I have to understand boundaries.  
 2 And sometimes, for whatever decision, congress can waive  
 3 this or that for that particular city to allow loans to  
 4 be done.  
 5 And to my familiarity of growing up here and my  
 6 work experience, it didn't make sense to me, other than  
 7 illegal racial gerrymandering, and that's just been my  
 8 lifetime experience of working ten-plus years for the  
 9 federal government and understanding community  
 10 facilities.  
 11 And I've had to be familiarized with SEPA, NEPA  
 12 environmental protection acts, also understanding  
 13 endangered species list, understanding local, federal  
 14 laws, and state laws on how they apply.  
 15 And when you have that type of experience, when  
 16 something looks wrong, and to me, racial gerrymandering  
 17 is in this presence, in my opinion.  
 18 BY MR. HUGHES:  
 19 **Q. Do you have an understanding -- you just**  
 20 **mentioned several laws there.**  
 21 **Do you have an understanding, even a lay**  
 22 **understanding, of any of the laws governing**  
 23 **redistricting in this state?**  
 24 A. I'm going to say no in -- in this state, other  
 25 than what I've read in Yakima Herald or -- or other

6 (Pages 21 to 24)

Page 25

1 things, you know. So no.

2 **Q. And what have you read in the Yakima Herald or**  
3 **other places that you just mentioned?**

4 A. I'm trying to recall, but obviously districts  
5 or where you're going to go ahead and meet with people  
6 are important to know, and the change of potential  
7 represent- -- representation is critical to know.

8 And in this case, it seemed to be a very  
9 drastic change, and I can say that with LULAC, bringing  
10 up the Perry case in my Complaint seemed to fit that  
11 description.

12 **Q. What specifically about the map do you -- looks**  
13 **wrong to you? And when I -- when I say that, what I**  
14 **mean is, are there any specific geographical quirks or**  
15 **anything like that, that you think is only explicable by**  
16 **race?**

17 A. Going through three counties is a little  
18 different, and not really, like I said, you know,  
19 hitting any particular landmark such as the Highway 82  
20 or other things and drastically changing it, to me  
21 that's -- there was a lot of racial gerrymandering that  
22 occurred, personally, in my opinion.

23 **Q. Drastically changing it from what?**

24 A. To -- to making sure that -- that leadership  
25 changed in -- in fair elections.

Page 26

1 **Q. Mr. Garcia, I think I just heard you say that**  
2 **the legislative district was drastically changed. And**  
3 **what I'm asking is, drastically changed from what?**

4 A. Well, there's no land- -- particular landmark  
5 in that case, or highway, like I said, 82. Look, most  
6 of the district was in Yakima County, most of that  
7 district on 15th, and it drastically changed to three  
8 other counties. And it's very unusual.

9 And you can look at the Complaint. I mean, you  
10 don't have to agree with it, but, you know, you can see  
11 in the Complaint why -- you know, how it's drastically  
12 changed. It's kind of hard to describe sometimes, but,  
13 you know, it is there for everyone to see.

14 **Q. No, understood. I'm just trying to get a sense**  
15 **of your understanding of the Complaint because this is**  
16 **your lawsuit ultimately.**

17 A. Uh-huh. It is.

18 **Q. Mr. Garcia, do you know any of the**  
19 **redistricting commissioners?**

20 A. Do I know any of the redistricting  
21 commissioners? No, not -- not really. I mean, the ones  
22 that determined -- I think there was seven of them.

23 **Q. Well, let me go to -- do you know Joe Fain?**

24 A. Not -- no.

25 **Q. Do you know Paul Graves?**

Page 27

1 A. I have contacted him once before, twice before,  
2 yes.

3 **Q. How do you know Paul Graves?**

4 A. Paul Graves. I was given a number that speaks  
5 to Paul Graves on redistricting, and we had discussed it  
6 for a few minutes on the redistricting.

7 **Q. And what did you discuss?**

8 A. I could say that we agreed that -- that the  
9 redistricting seemed to be racial gerrymandering.

10 **Q. Can you -- do you remember anything else about**  
11 **that discussion?**

12 A. No. It was very brief. It was very brief. I  
13 mean, I don't recall everything. I don't recall the  
14 conversation -- all the conversation. I'm just letting  
15 you -- I don't recall the -- but it was a brief  
16 conversation.

17 **Q. Was it a phone call? In person? Zoom?**

18 A. No, it was a phone call. Yeah, no, it was a  
19 phone call.

20 **Q. And about when was that conversation?**

21 A. I want to say the winter -- early winter 2022,  
22 possibly.

23 **Q. So approximately January, February 2022?**

24 A. It could be. You know, I -- I've had a lot of  
25 phone calls, so I apologize.

Page 28

1 **Q. Sure.**

2 A. Running for congress, I've spoken to a lot of  
3 politicians on both ends.

4 **Q. I can't even imagine.**

5 A. So I know it was a brief conversation. And I  
6 don't recall everything on that conversation, so I  
7 apologize.

8 **Q. To your memory, who was it that first**  
9 **suggested, in this phone call, that LD 15 was racial**  
10 **gerrymandering? Was it you or Mr. Graves?**

11 A. I don't recall.

12 **Q. You recall, though, that you both agreed with**  
13 **that?**

14 A. I do -- I do recall that, yes, the sentiments  
15 were there. I mean, we didn't flat-out agree, but I had  
16 looked more into -- into things at that point.

17 **Q. You didn't flat-out agree. What does that**  
18 **mean?**

19 A. In other words, he didn't say clearly, oh, I  
20 agree that this -- you know. But we were -- we were  
21 talking in that perspective.

22 **Q. Do you remember what he did say?**

23 A. No, I don't.

24 **Q. And you said you were given a number to speak**  
25 **with Mr. Graves. Who gave you the number?**

7 (Pages 25 to 28)



Page 29

1 A. That would have been Maia.

2 Q. Maia Espinoza?

3 A. That's correct.

4 Q. Okay. Would that have been in the first call  
5 with her?

6 A. I would assume so.

7 Q. How many phone calls did you have with  
8 Ms. Espinoza?

9 A. I had a few because I wanted to get pamphlets  
10 and talk about the pamphlets to hand out to people to  
11 register to vote, what their rights are, civics. It was  
12 a civics pamphlet.

13 Q. So you had a few conversations in which --  
14 strike that.

15 Did you have a few conversations in which this  
16 litigation was discussed, or the possibility of --

17 A. With her -- say that again?

18 Q. Yeah. Did you have multiple conversations with  
19 Ms. Espinoza in which you talked about a potential  
20 racial gerrymandering lawsuit?

21 A. No. No. We spoke about me wanting to see  
22 about the civics, getting pamphlets, and we also spoke  
23 about speaking to Paul. But, you know, that -- some of  
24 the challenges to try to get a number of pamphlets, they  
25 cost quite a -- you know, they cost money.

Page 30

1 And unfortunately, I wasn't able to get my --  
2 you know, get as many as I would have wanted to pass out  
3 to people to vote, so -- we -- we live -- I haven't  
4 spoken to her too much. It's been a long time.

5 Q. So let me try and get the order of events here.

6 A. Uh-huh.

7 Q. So the first time this came up for you, a  
8 potential racial gerrymandering lawsuit, was when Maia  
9 Espinoza called you; correct?

10 A. I had -- I had contacted her before, before the  
11 civics pamphlets.

12 Q. About a potential gerrymandering claim?

13 A. No, no, no, no, no. I had contacted her  
14 before, and she had been pretty politically busy.  
15 But --

16 Q. Understood.

17 A. You know, we got to talking about that during  
18 one of the phone conversations.

19 Q. So, Mr. Garcia, again, what I'm trying to do  
20 here is just connect the dots in how you got to become a  
21 plaintiff in this lawsuit.

22 So I'm just asking about that for now. So the  
23 first thing that happened was Maia Espinoza called you;  
24 correct?

25 A. Correct.

Page 31

1 Q. And she put you in touch with Paul Graves;  
2 correct?

3 A. Yes.

4 Q. What happened after you talked to Paul Graves?

5 A. I contacted -- I -- I went ahead and started  
6 looking more into the redistricting. And so, you know,  
7 it's, like I said, a change in leadership, from Jeremie  
8 Dupree [sic], who was the 15th District congress -- I  
9 mean, representative there, and I know Jeremie because  
10 he's also military.

11 So I had a lot of concerns. And the fact that  
12 the newspaper had stated that he would have to move if  
13 he were going to go ahead and stay the representative  
14 for the next election.

15 So I had looked -- I had been looking into what  
16 was happening on 15th District, not only as my  
17 representative, but I know Jeremie very -- I know  
18 Jeremie. We served on the board together with the  
19 Yakima County Veterans Coalition. And so, you know, I  
20 was concerned about why these things were happening, you  
21 know.

22 Q. Understood.

23 And, Mr. Garcia, when you say Jeremie Dupree,  
24 do you mean Jeremie Dufault?

25 A. Dufault. I'm sorry. Jeremie Dufault. Sorry.

Page 32

1 Q. No worries.

2 When you said that you started looking into  
3 this after you spoke with Paul Graves, what did you do  
4 besides speaking with Mr. Dufault?

5 A. Actually, I didn't speak with Mr. Dufault. I  
6 know him because we -- like I said, we served on boards  
7 together.

8 Q. Okay.

9 A. And I was concerned because I believe he's a  
10 very good representative. Might not agree with  
11 everything, but certainly a representative that I think  
12 has good intentions.

13 Q. Okay. So, Mr. Garcia, you were upset that  
14 the --

15 A. I wasn't upset. I was concerned.

16 Q. Fair. You were concerned that the redrawn  
17 LD 15 districted out Jeremie Dufault?

18 A. Yes.

19 Q. And is that part of why you were considering  
20 bringing this lawsuit?

21 A. The reason I brought this lawsuit, after  
22 looking at things, and thinking about it, is, I do  
23 believe it is based on racial gerrymandering. That is  
24 the reason.

25 Regardless if it was Jeremie that would maybe

8 (Pages 29 to 32)

Page 33

1 lose the election, whoever it may be, I'm more concerned  
2 about the right thing happening than anything else.  
3 That is what I am concerned about.

4 And that is just my opinion, that it is -- this  
5 redistricting is very different than any other in the  
6 past, and that it's based on racial gerrymandering. And  
7 it is not something that's not too hard to believe. You  
8 know, you could research -- you know, I mean, the  
9 Complaint that we put on was an example of LULAC.

10 **Q. So after you spoke with Mr. Graves, you said**  
11 **you looked into matters, or I don't remember the exact**  
12 **language, but what did you do after you spoke with**  
13 **Mr. Graves, specifically, in consideration of bringing**  
14 **this lawsuit?**

15 A. Let me think about that. I believe I spoke to  
16 my attorney.

17 **Q. Did Mr. Graves give you Mr. Stokesbary's**  
18 **contact information?**

19 A. You know, I don't recall that, if he did.

20 **Q. Do you recall how you decided on -- or first**  
21 **reached out to Mr. Stokesbary?**

22 A. You know, I don't recall exactly how I ended up  
23 getting to speaking to my attorney. And like I said,  
24 you know, I had had a house fire. I made a lot of  
25 political phone calls.

Page 34

1 I was concerned about, you know, civil rights  
2 and many other things. And so to be honest, at this  
3 moment, I can't say I recall how I got to Drew's number.  
4 But it wouldn't surprise me if I found it in research or  
5 maybe, you know, somebody had made a suggestion as I was  
6 doing political points, talking about why I'm running  
7 and whatnot. So to be honest, I can't exactly say I  
8 recall how I got to Drew's number.

9 **Q. Did you know Mr. Stokesbary before he was your**  
10 **lawyer?**

11 A. No.

12 **Q. Did you know who he was?**

13 A. I had heard of him because, when you're run- --  
14 being -- challenging for U.S. Congress, other people  
15 have heard about him and wanted his endorsement. So,  
16 you know, I had known of him somewhat. But I couldn't  
17 quite put a picture -- a name to, you know, a face.

18 **Q. Had you read his Wikipedia page?**

19 A. No, actually, I hadn't. So I apologize.

20 **Q. So just to -- no need to apologize for that.**

21 **Just to connect the dots fully then, so Maia**  
22 **Espinoza called you, suggested you call Paul Graves.**  
23 **You talked to Paul Graves. And then the next person you**  
24 **talked to about this was Drew Stokesbary? Is there**  
25 **anyone else you spoke to in consideration of bringing**

Page 35

1 **this lawsuit, or in considering bringing this lawsuit?**

2 **Did you freeze, or am I frozen?**

3 MR. STOKESBARY: I think he might have  
4 frozen.

5 Benancio, are you there?

6 MR. HUGHES: Could we go off the record for  
7 a second?

8 (Pause in proceedings.)

9 BY MR. HUGHES:

10 **Q. So let me just re-ask the question, Mr. Garcia,**  
11 **before you froze.**

12 **So based on what you told me, it sounds like**  
13 **what happened was, Maia Espinoza called you, suggested**  
14 **you call Paul Graves. You then called Paul Graves, and**  
15 **the next person you talked to about this lawsuit was**  
16 **Drew Stokesbary. Is that right?**

17 A. Could very well be. Could very well be. Like  
18 I said, you know, I can't exactly recall because I was  
19 talking to a lot of people, paying attention to what was  
20 going on, and concerned about the re- -- the illegal  
21 racial gerrymandering redistricting that occurred.

22 **Q. Is there anyone else you spoke to about**  
23 **potentially bringing this lawsuit?**

24 A. You know what? I -- I did bring it up at times  
25 when I was campaigning, that I was the only candidate

Page 36

1 that's currently running that is fighting the  
2 redistricting, yes. So there were many people,  
3 obviously, that -- that heard me say that.

4 **Q. Aside from some public statements, have you**  
5 **spoken with anyone in the Republican Party about this**  
6 **lawsuit?**

7 A. Well, a lot of those people were Republicans  
8 that I spoke to when I said those things.

9 **Q. Right. So I'm asking, aside from public**  
10 **statements, did you ever speak with any Republican**  
11 **officials, or, you know, Republican --**

12 A. Well --

13 **Q. -- staffers --**

14 A. -- to many -- I mean, look, as far as when I'm  
15 out there in the 4th District, you know, if it was  
16 Benton County Republican Party or whatnot, during the  
17 vetting system, I would have made it clear that I am the  
18 only candidate that's running -- and it was a general --  
19 it didn't get into detail or anything, but it was in  
20 generality of why I feel that I want to defend this.

21 So I mean, I spoke to a lot of people.

22 **Q. Do you know -- sorry.**

23 A. I spoke to a lot of people. A lot of people,  
24 you know, whether they be PCOs or whether they be  
25 chairmen at meetings and whatnot, I did bring it up,

9 (Pages 33 to 36)

Page 37

1 yes.

2 **Q. Do you know Jim Troyer?**

3 A. No. I know a lot of people, but there's a lot  
4 of people you meet. And to be honest, I probably don't  
5 know him personally, but I might have ran into him as I  
6 was campaigning. So I apologize.

7 **Q. Fair.**

8 **So, Mr. Garcia, I was asking you about the**  
9 **commissioners and whether you'd spoken with any of them,**  
10 **and I got about halfway through. So I want to return to**  
11 **that.**

12 **Have you ever spoken -- do you know April Sims?**

13 A. Not that I am aware of.

14 **Q. Do you know Brady Piñero Walkinshaw?**

15 A. Not that I'm aware of. I'm recalling the  
16 Yakima Herald's pictures of the commissioners on that,  
17 and how they weren't able to meet the deadline that is  
18 the RCW in order to go ahead and finalize the -- the  
19 adjudication of the commission, of that district.

20 So I know they had certainly surfaced the time  
21 limit in which the law gives them, and their pictures  
22 were put out. So putting a face to a name, you know, on  
23 any of them, I really couldn't. But did I read about  
24 it? Yes.

25 **Q. But you never spoke with either Ms. Sims or**

Page 38

1 **Mr. Walkinshaw?**

2 A. You know, I can't say I haven't, but Sims  
3 sounds familiar. So Sims sounds familiar, but not --  
4 not that I can recall. I mean, like I said, in passing,  
5 because I also came up to this side of the mountains  
6 often and spoke to a lot of people. So...

7 **Q. And for the record, this side of the mountains,**  
8 **you're referring to the western side of the mountains**  
9 **right now?**

10 A. Yes, the western side. Yes, yes, the western  
11 side.

12 **Q. Do you know Sarah Augustine?**

13 A. Not -- not that I recall.

14 **Q. Okay. Do you know Jose Trevino?**

15 A. I do.

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

17 A. I've known Mr. Trevino for a number of years.  
18 He was --

19 **Q. How -- go ahead.**

20 A. Sorry.

21 **Q. Go ahead.**

22 A. Oh, he is from Sunnyside. I grew up in  
23 Sunnyside. I know he was a police officer at one time.  
24 And so I've known him a number of years, and he's also  
25 the mayor of Granger.

Page 39

1 **Q. Have you ever discussed redistricting with**  
2 **Mr. Trevino?**

3 A. No.

4 **Q. Have you ever talked to him about any lawsuits?**

5 A. In regards to this?

6 **Q. Yeah.**

7 A. No. The last time I -- I actually -- I -- I --  
8 yeah. I had dinner with Mr. Trevino and his wife. This  
9 was at the Olive Garden about five years ago or so. But  
10 I do know Jose.

11 **Q. That was the last time you met with him,**  
12 **though?**

13 A. That I -- I would say met with him, but maybe  
14 also at something at KDNA, which is in dis- -- where  
15 he's the mayor at in Granger. You know, with maybe  
16 LULAC or something like that, you know.

17 **Q. What's KDNA?**

18 A. That's the radio -- Latino radio station.

19 **Q. Okay.**

20 A. Yeah.

21 **Q. Do you know Alex Ybarra?**

22 A. I've met him, yes.

23 **Q. And how do you know Mr. Ybarra?**

24 A. The first time I knew about him was at the  
25 event that Mr. Honeyford had mentioned, I believe that

Page 40

1 was in Bellevue, where I met Maia. It was both -- it  
2 was an open party event, so, you know, you had a lot of  
3 Democrats, you had a lot of Republicans who were there,  
4 and he was a guest speaker. And I heard him speak, and  
5 I thought it was very nice.

6 **Q. And you met him after he spoke?**

7 A. I did. I shook hands with him. I was -- I was  
8 very pleased to know that he was from the Ephrata area.  
9 He's also state representative. And to hear his story  
10 from others working in the fields to -- you know, his  
11 parents, I could relate to that. And working for NASA,  
12 and then coming back home to want to make a difference  
13 in his community.

14 **Q. Have you ever discussed redistricting with**  
15 **Representative Ybarra?**

16 A. No.

17 **Q. Do you know Ismael Campos?**

18 A. I believe so, yes. Campos family, yes.

19 **Q. How do you know Mr. Campos?**

20 A. If it's the same one I'm thinking about, he  
21 used to be law enforcement.

22 **Q. I believe he also goes by Mel Campos, if**  
23 **that --**

24 A. I'm sorry. Say again?

25 **Q. I believe he also goes by Mel Campos, if that**

10 (Pages 37 to 40)

Page 41

1 **changes anything for you.**

2 A. I could be mixing him up with one of his  
3 brothers, so I apologize if I am. There's a large  
4 family, and -- you know, so I -- I am -- I'm sure I know  
5 who you're talking about. He was former law enforcement  
6 out of Wapato.

7 **Q. Have you ever discussed redistricting with**  
8 **Mr. Campos?**

9 A. No.

10 **Q. Do you know his brother Pablo, or Paul, Campos?**

11 A. I know a few of his brothers, but the names  
12 sometimes skip me, so...

13 **Q. I hear you.**

14 MR HUGHES: This would be a good time for me  
15 to take a break, if it works for everyone else.

16 Do you want to take a break now?

17 THE WITNESS: That would be fine with me.

18 (Recess from 10:00 a.m. to 10:07 a.m.)

19 E X A M I N A T I O N (Continuing)

20 BY MR. HUGHES:

21 **Q. Mr. Garcia, welcome back.**

22 A. Thank you.

23 **Q. Do you believe that you were harmed by the**  
24 **current boundaries of LD 15?**

25 A. Yes.

Page 42

1 **Q. And how?**

2 A. Due to the fact it's illegal gerry- -- racial  
3 gerrymandering, that's how I'm harmed.

4 **Q. Okay. Can you say more about that?**

5 A. You know, I -- being part of LULAC, like I told  
6 you, the United Latin American Citizens, we had gotten a  
7 chapter there. I was familiar with at least knowing  
8 that LULAC, which is the oldest Hispanic organization in  
9 the country, had felt the same -- had the same feelings  
10 I did when, you know, at that time they taken Perry,  
11 Governor Perry, on a civil litigation -- civil  
12 litigation, and defended the rights of American voters.  
13 So I feel the same way in this case.

14 **Q. In this -- oh, sorry. Go ahead.**

15 A. I just feel the same way.

16 **Q. What's your goal in this lawsuit?**

17 A. The goal is to have it adjudicated to determine  
18 to the people that, you know, if I'm right or wrong on  
19 my beliefs, that this was done illegal ger- -- racial  
20 gerrymandering, at least I did my due diligence, and  
21 like I -- me protecting my country in combat, to me  
22 protecting my rights -- voting rights.

23 **Q. Do you want to change the map?**

24 A. Yes.

25 **Q. How?**

Page 43

1 A. I want to change the map to where I feel that  
2 it was probably -- its original, the way it originally  
3 was, as I -- you know, as a voter. So hopefully it goes  
4 back, but that will be up to the court system to decide  
5 whether I'm right or wrong.

6 **Q. So, Mr. Garcia, is your goal in this lawsuit**  
7 **then to have the map set back to the -- the map that was**  
8 **in effect from 2012 to whenever this new map came into**  
9 **effect?**

10 A. Well, the goal in my lawsuit is to determine  
11 whether I am right in my beliefs that this was made  
12 illegally through racial gerrymandering for a decision  
13 to be made amongst my peers for the courts. That is my  
14 goal. Because I strongly believe in protecting our  
15 freedoms.

16 **Q. And if you are right, if the Court finds you**  
17 **are right, what do you want to happen?**

18 A. Well, that we go through -- if the courts  
19 have -- findings are that I am correct, then we go  
20 through the process again to determine the map.

21 **Q. Understood.**

22 **Is there any -- never mind.**

23 **Mr. Garcia, do you know Nikki Torres?**

24 A. I do know her, yes.

25 **Q. How do you know her?**

Page 44

1 A. Well, running through the campaign. So you  
2 meet a lot of people, you know. So I met her in  
3 Tri-Cities when I was campaigning, at a parade.

4 **Q. And Ms. Torres is your state senator now?**

5 A. Yes.

6 **Q. Okay. So I will do her the honor of calling**  
7 **her Senator Torres then.**

8 A. Okay.

9 **Q. Do you like Senator Torres?**

10 A. Well, she was fine to me, so we met. I don't  
11 know her personally, but she seemed like a nice person,  
12 so...

13 **Q. Well, I won't ask you how you voted because I**  
14 **think that's probably private, but do you like having**  
15 **Senator Torres as your state rep- -- state senator?**

16 A. You know, Ms. Torres, I am fine with. She  
17 seems nice.

18 **Q. Do you want Ms. Torres to keep representing**  
19 **you?**

20 A. Well, I will say no.

21 **Q. Why is that?**

22 A. Because I believe the redistricting was illegal  
23 gerrymandering. It's not on the individual themselves.  
24 It is the fact that I believe it was racially illegally  
25 gerrymandered. That's my problem.

11 (Pages 41 to 44)



Page 45

1 It's got nothing to do with any personal  
2 representative, has nothing to do with the fact if  
3 Jeremie Dufault is no longer so much the representative.  
4 It's the fact that, in my core beliefs, I strongly  
5 believe in following our constitution, and I -- and I  
6 strongly believe in defending those rights. So it's got  
7 nothing to do personally with anyone.

8 **Q. Understood.**

9 I want to switch gears just a little bit. You  
10 said you're aware of the Soto Palmer v. Hobbs case;  
11 correct?

12 A. Yes. When I got served the papers, and I mean  
13 by that is, I just read where I had to be, so I -- you  
14 know, so that's what I mean.

15 **Q. Do you have any understanding of what the**  
16 **Soto Palmer v. Hobbs case is about?**

17 A. No.

18 **Q. You haven't read any news articles about it?**

19 A. No.

20 **Q. Okay. I asked you earlier about Jose Trevino,**  
21 **Alex Ybarra, and Ismael Campos, and you recall that**  
22 **discussion?**

23 A. Yes, I do.

24 **Q. Are you aware that Messrs. Trevino, Ybarra, and**  
25 **Trevino have intervened as defendants in the Soto Palmer**

Page 46

1 **litigation?**

2 A. I'm aware in the sense that I was served the  
3 paperwork, but I -- I didn't look into -- I mean, I --  
4 all I looked at basically is where I had to be, and the  
5 time of the deposition was going to be. I didn't look  
6 into anything more than that.

7 **Q. So you said you were not aware of the**  
8 **Soto Palmer litigation until you got your subpoena;**  
9 **correct?**

10 A. That's correct.

11 **Q. And when did you get your subpoena?**

12 A. Last week.

13 **Q. Okay. So the last week of January?**

14 A. Yes.

15 **Q. Did you ever agree that you would dismiss your**  
16 **lawsuit if Messrs. Trevino, Ybarra, and Campos were**  
17 **allowed to bring racial gerrymandering claims in the**  
18 **Soto Palmer case?**

19 MR. STOKESBARY: I'm going to object to the  
20 extent this calls for attorney-client communication, and  
21 instruct you not to answer that question, Ben.

22 MR. HUGHES: I'm going to have to push back  
23 on that, Drew. I don't know how him making a decision  
24 about whether he would dismiss his lawsuit is  
25 necessarily attorney-client privileged. It's a yes or

Page 47

1 no question.

2 MR. STOKESBARY: Well, I -- Andrew, I  
3 thought the question said, did you discuss with your  
4 lawyer. That sort of is the -- the --

5 MR. HUGHES: No. No. Let me do the  
6 question again. I apologize if I misspoke.

7 BY MR. HUGHES:

8 **Q. Mr. Garcia, did you ever agree that you would**  
9 **dismiss your lawsuit if Messrs. Trevino, Ybarra, and**  
10 **Campos were allowed to bring racial gerrymandering**  
11 **claims in Soto Palmer v. Hobbs?**

12 A. No.

13 **Q. Okay. I'm going to show you --**

14 A. I --

15 **Q. Oh, go ahead. Sorry.**

16 A. No. I brought this lawsuit on the fact that --  
17 that I believe that there was racial gerrymandering  
18 occurring, and that I would see this all the way  
19 through.

20 **Q. That's important to you, that you -- you are**  
21 **going to see this lawsuit all the way through?**

22 A. As important as it was for me to run for U.S.  
23 Congress because I believe I will do what is the best  
24 interests of 4th District. It's as important to me that  
25 when I signed on to this lawsuit, that I would see to

Page 48

1 the end what would occur. There's no wavering on my  
2 completion of this.

3 **Q. Understood.**

4 I'm going to show you a document real quick.  
5 Let me make sure I have the right one before I share my  
6 screen.

7 A. I'm sorry. I only have cell phone, and my  
8 glasses are having difficulty viewing the document.

9 **Q. Okay. Do you see a document on the screen**  
10 **right now?**

11 A. Yes, I do. Well, it went off the screen.

12 **Q. My Zoom quit unexpectedly. Let me try this one**  
13 **more time.**

14 **Okay. Can you see a document on my screen,**  
15 **Mr. Garcia?**

16 A. Yes, I do.

17 **Q. Are you able to read it?**

18 A. Yes. The defendants, Jose, Ismael, and Alex  
19 Ybarra.

20 **Q. And you see it says, "Intervenor Defendants'**  
21 **Opposition to Plaintiffs' Motion to Bifurcate and**  
22 **Transfer, Strike, and/or Dismiss Intervenor's**  
23 **Crossclaim"?**

24 A. I do see that.

25 **Q. Have you ever seen this document before?**

12 (Pages 45 to 48)



Page 49

1 A. I saw this document. It was served when I got  
2 my subpoena.

3 Q. This particular document was served with your  
4 subpoena?

5 A. Let me see. It might not be. Not that  
6 particular document, no.

7 Q. Okay. So you've never seen this document  
8 before then?

9 A. No.

10 Q. Okay. I want to scroll down to Page 4. Do you  
11 see -- well, let me -- hang on. Let me -- do you see  
12 here -- this is actually Page 7 -- that this is signed  
13 by Andrew Stokesbary?

14 A. Correct.

15 Q. That's your lawyer in this case?

16 A. That's correct.

17 Q. And it says here that Mr. Stokesbary also  
18 represents intervenor defendants?

19 A. Yes.

20 Q. So you understand that he represents the  
21 intervenor defendants in the Soto Palmer case?

22 A. Well, obviously he put it in writing, yes, that  
23 he is.

24 Q. Okay. So I want to look at Page 4 then of this  
25 document.

Page 50

1 A. Uh-huh.

2 Q. And it says -- do you see where I'm  
3 highlighting? "Intervenors' counsel represents that  
4 Garcia will be voluntarily dismissed once it is clear  
5 that this Court will allow Intervenors' Fourth Amendment  
6 Crossclaim to proceed in this case"?

7 Do you see that?

8 A. Could you highlight that again?

9 Q. Uh-huh.

10 A. I'm trying to read it. I'm sorry. It's off a  
11 cell phone and -- that is new news to me.

12 Q. You never agreed to this?

13 A. I will never agree to not be part -- I agreed  
14 that I would finish this all the way through to --

15 Q. So this representation was made without your  
16 authorization then?

17 A. Yes.

18 MR. HUGHES: Okay. That's all I have. I'll  
19 stop screen sharing. And, Mark, the witness is yours.

20 MR. GABER: Thank you.

21 EXAMINATION

22 BY MR. GABER:

23 Q. Mr. Garcia, it's nice to meet you. My name is  
24 Mark Gaber. I represent the plaintiffs in the  
25 Soto Palmer case, and so we sent you the subpoena. And

Page 51

1 I just want to, again, apologize for the  
2 misunderstanding that you were under the impression you  
3 needed to travel from your home. You could have done  
4 this today from any computer anywhere.

5 So I do thank you for traveling, and hope at  
6 least you've had a nice visit. And I believe you're in  
7 Tacoma; is that right?

8 A. Yes.

9 Q. And so I just want to -- I'll try not to repeat  
10 anything that Mr. Hughes asked you, but it's always hard  
11 when there's two people taking a deposition like this,  
12 so if I do repeat anything, I apologize.

13 So I just wanted to clarify. I know you said  
14 that you've moved a couple times. Where do you  
15 currently reside?

16 A. 311 Birch Avenue, Grandview, Washington 98930.

17 Q. And is that your home that had the fire?

18 A. Yes.

19 Q. Has the -- have the fire damage been  
20 remediated?

21 A. About 90 percent, somewhere around there.

22 Q. And do you intend to remain a resident there?

23 A. Yes.

24 Q. Now, you mentioned that you had a conversation  
25 with Paul Graves.

Page 52

1 Had you known Paul before that conversation?

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

3 Q. And what do you know about Mr. Graves'  
4 involvement as -- or his work as a commissioner, as a  
5 redistricting commissioner?

6 A. Other than he's a commissioner, that's --  
7 that's it. I mean, there wasn't much discussion.

8 Q. Did you know that Mr. Graves and his staff were  
9 responsible for drawing District 15 in the adopted plan?

10 A. I am aware of that.

11 Q. Did it strike you as unusual that he was  
12 contacting you to discuss that the plan he had drawn was  
13 a racial gerrymander?

14 A. Well, he didn't contact me. I contacted him.

15 Q. Your understanding was that he was expecting  
16 your phone call; is that right?

17 A. Well, I don't know if he was expecting my phone  
18 call. It's been a little while, so I can't recall the  
19 whole thing. I know that Maia had given me his number.

20 Q. Okay.

21 A. So it's been a little while, so I apologize for  
22 that.

23 Q. But he had a conversation with you, and you  
24 took away from it that he was sympathetic to what you  
25 were expressing, that you thought there was a problem

13 (Pages 49 to 52)

Page 53

1 that District 15 was a racial gerrymander; is that -- am  
2 I understanding that correctly?

3 A. Yes.

4 Q. And at the time, did you talk with him about  
5 the fact that he was heavily involved in drawing  
6 District 15?

7 A. Well, obviously he was heavily involved in  
8 drawing, but I know that the committee certainly did not  
9 go into complete agreement. There was a lot of issues  
10 on that for -- and you could look at the newspaper and  
11 you could see that they had passed the deadline, which  
12 was state law, in which they were supposed to  
13 adjudicate, to where it actually went to the courts.

14 Q. Are you aware that Mr. Graves has testified in  
15 this litigation that he was involved in lighting the  
16 fire for your lawsuit?

17 MR. HUGHES: Object. Misstates the  
18 evidence, misstates Mr. Graves' testimony.

19 A. I'm sorry. Say again? I didn't hear that  
20 question.

21 BY MR. GABER:

22 Q. Are you aware that Mr. Graves has testified  
23 that he helped light the fire for your lawsuit?

24 MR. HUGHES: Objection. Misstates  
25 Mr. Graves' testimony.

Page 54

1 A. No, I didn't know Mr. Graves had taken, you  
2 know -- had done a deposition. The same thing that, you  
3 know -- for example, a misunderstanding, being here in  
4 Tacoma today, when I didn't have to be here. So, you  
5 know, obviously there's not much communication until the  
6 last minute. So...

7 BY MR. GABER:

8 Q. But do you understand that Mr. Graves,  
9 nevertheless, thinks that the plan is not, in fact, a  
10 racial gerrymander?

11 A. He has a right to his own opinion. So I -- I  
12 don't know what -- what he -- what he -- what he said  
13 under his deposition.

14 Q. Was it your impression, from your phone call  
15 with him, that he wanted you to file a lawsuit?

16 A. I -- I won't say that that was the impression,  
17 that he -- that he wanted me to file. But I was under  
18 the impression that he wasn't content with the  
19 redistricting. That was just my -- from -- from -- you  
20 know, we spoke probably about five minutes or so.

21 Q. Do you know why Ms. Espinoza asked you to call  
22 him?

23 MR. STOKESBARY: Objection as to form.

24 A. Could you repeat that question again?

25 ///

Page 55

1 BY MR. GABER:

2 Q. Yeah. Do you know why Ms. Espinoza suggested  
3 that you call Mr. Graves?

4 A. I believe that -- that she was concerned about  
5 the redistricting.

6 Q. What was the purpose of calling Mr. Graves? I  
7 mean, you had a five-minute conversation with him.  
8 Did -- do you under- -- do you have any understanding as  
9 to what was to come of that conversation?

10 A. You know what? No. Because she was -- Maia  
11 was very brief about it, and I mean very brief. And  
12 like I said, you know, I thought the initial  
13 conversation was going to be about the -- the books,  
14 pamphlets that she had for civics that I was interested  
15 in, because I called her, but I knew she was busy  
16 because she had ran for state representative for OSPI,  
17 public school -- office of school instructions. So, you  
18 know, I knew that. I was hoping she would give me a  
19 call back, and I was hoping to get a box of those  
20 pamphlets, you know.

21 Q. And I don't remember if you were asked this, so  
22 I apologize if I'm repeating something.

23 How did you first get in touch with  
24 Mr. Stokesbary? Did you call him or did he contact you?

25 A. No, I think it would have been -- I think --

Page 56

1 well, I shouldn't say "I think," but I probably called  
2 him, but I don't remember the mechanism of how because,  
3 you know -- or who gave me the number or whatever the  
4 case was. That, I don't recall.

5 I mean, I spoke to a lot of people. I'm very  
6 passionate about civil rights. And, you know, I had so  
7 many things going on other than a political -- running  
8 for congress, you know, dealing with moving five  
9 locations, basically, during this whole process. So I  
10 had a lot of things happening at one time. So I  
11 can't --

12 Q. And just to clarify on the conversation with  
13 Mr. Graves, was that after the map was already in place,  
14 after the State Supreme Court had said, okay, that's the  
15 map?

16 A. No. That -- that was before, you know, before  
17 it went to -- way before.

18 Q. Okay.

19 A. My -- yeah, that was way before. We're talking  
20 in the wintertime.

21 Q. And --

22 A. And so --

23 Q. Go ahead.

24 A. Sorry.

25 Q. Winter of -- so just to put a -- be more

14 (Pages 53 to 56)

Page 57

1 specific, what -- generally what month and year?

2 A. Before my Complaint was filed. It was months  
3 before that.

4 Q. Would that have been in 2021 or 2022?

5 A. The Complaint was filed --

6 Q. I think the Complaint was in the springtime of  
7 2021, March maybe?

8 A. Oh, it would have been in the wintertime.

9 Yeah. It was before the Complaint.

10 Q. But it was -- am I correct that it was after  
11 the November time period of 2021 when the commission  
12 approved the map, or approved the concept of the map?

13 A. Probably. I would say yes, yeah.

14 Q. Okay. Who are all of your attorneys in this  
15 case?

16 A. You know, be honest, I just know Drew has been  
17 my primary contact. And I met one of the -- well,  
18 didn't meet, but over the phone spoke with my attorney,  
19 and I apologize for not knowing his name offhand, but my  
20 glasses are a little fuzzy. I should have gone with my  
21 old-school glasses. So I can't read what's in front of  
22 me right now.

23 Q. Okay.

24 A. I should just take them off. So I apologize.

25 Q. So do you know how many attorneys you have in

Page 59

1 Q. Does Dallin Holt ring a bell?

2 A. Yes.

3 Q. Okay. Is that one of the -- is that who you  
4 spoke to?

5 A. I believe so, yes.

6 Q. And do you understand that he has associates

7 who are -- that work with him as well? Is that right?

8 A. That is correct.

9 Q. And they became your attorneys, as you  
10 understand it, yesterday; is that right?

11 A. That, and Drew remains my attorney, yes.

12 Q. Now, you talked a little bit with Mr. Hughes  
13 about this, but do you understand that your attorneys  
14 also represent three individuals who have intervened as  
15 defendants in the Soto Palmer lawsuit?

16 A. Yes. That was news to me that -- that --  
17 about -- about that, that -- at this point. Yes, this  
18 was just brought up. Yes.

19 Q. And when you say that was news to you, you mean  
20 during Mr. Hughes' questions of you, that's when you  
21 first learned that your attorneys also represented  
22 intervenor defendants in the Soto Palmer lawsuit?

23 A. Yes. That's also news to me.

24 Q. Are you aware of the relief that -- or the  
25 outcome that the intervenor defendants, who your counsel

Page 58

1 this case?

2 A. No.

3 Q. At some point have there been attorneys other  
4 than Mr. Stokesbary who represent you?

5 A. Yes. I spoke with my attorney yesterday.

6 Q. Okay. And how did that come to be?

7 A. I believe it was through Drew. So my primary  
8 attorney had given me notice, I believe, that another  
9 attorney would be talking to me specifically.

10 Q. But you don't -- you can't recall their names?

11 A. I've got it on my phone, but I'm using that  
12 right now for --

13 Q. Sure. And I don't want to -- it isn't a trick  
14 question. Is it the law firm of Holtzman Vogel?

15 A. It -- you know, I don't want to say yes or no  
16 because I just got his name basically yesterday. I  
17 believe it was yesterday or day before.

18 Q. Okay.

19 A. I'm just not -- I'm not sure of his name, and I  
20 apologize because I'm sure he's on here, so my sincere  
21 apologies. I can't use my cell phone to -- to take a  
22 look at his name, and my glasses, they're brand-new, and  
23 I just realized right now that I can't use them to read.

24 Q. They're useless to you.

25 A. Yeah. They're useless to me, so --

Page 60

1 represent in the Soto Palmer lawsuit, are you aware of  
2 the -- what they are asking the Court to do in the  
3 litigation?

4 A. I wasn't aware until it was brought up to me  
5 today that if the case were to move forward, that the  
6 intervening defendants -- or intervening Jose, Alex, and  
7 Mr. Campos would be the ones moving forward on the case  
8 and I would be withdrawn from the case. Is that  
9 correct?

10 Q. Well, that was the representation that was made  
11 by your counsel to the Court, so that is correct.

12 How does that make you feel?

13 A. I got to be honest. I made it clear that, if I  
14 started this, I was going to finish to the end, and I am  
15 not pleased.

16 Q. And you're not pleased to be learning that for  
17 the first time in this deposition; is that right?

18 A. Absolutely correct.

19 Q. Are you aware that the intervenor defendants,  
20 in particular Mr. Ybarra and Mr. Trevino, have testified  
21 in depositions in this litigation that it's their desire  
22 that the map remain unchanged?

23 A. I was unaware of that.

24 Q. The first time you're learning that is when I  
25 just told you that in my question?

15 (Pages 57 to 60)

Page 61

1 A. Yes.

2 Q. And are you aware -- or strike that.

3 Now, I understand, from your conversation with  
4 Mr. Hughes, that -- am I right that you -- you want the  
5 map to be changed?

6 A. That is correct, what I stated, yes.

7 Q. And so this is the first time you're learning  
8 that your attorneys are both representing intervenors in  
9 the Soto Palmer case, asking that the map not be  
10 changed, and also representing you at the same time,  
11 where you want the map to be changed?

12 A. Yes.

13 Q. Do you see a problem with that?

14 A. Yes, I do.

15 Q. And what is that?

16 A. There are conflicting reasons why the Complaint  
17 was filed on initially why I filed it and to know that,  
18 if this case were to be moved forward, the intervening  
19 witnesses, or defendants, however you want to --  
20 plaintiffs, would go ahead and see the Complaint in a  
21 different light, opposite to what was initially filed,  
22 and that I would not see this to fruition, to completion  
23 of adjudication.

24 Q. So the problem is both that -- that your  
25 counsel was saying they would dismiss your lawsuit

Page 62

1 without your authorization --

2 A. Uh-huh.

3 Q. -- but also it's a problem that they have  
4 clients whose interests are opposite to yours; is that  
5 correct?

6 A. That's correct.

7 Q. And I assume it was your expectation that your  
8 counsel would be representing your point of view  
9 exclusively; correct?

10 A. That is correct, and under our legal  
11 representation agreement.

12 Q. And so your -- your written agreement with your  
13 counsel provides that they will represent your interests  
14 and your desires, and not be in conflict with that?

15 A. At free cost through the duration of this  
16 Complaint.

17 Q. And you agree with the statement I made as  
18 well?

19 MR. STOKESBARY: Hey, I'm sorry, Mark. I  
20 couldn't find my mute button in time, but I'm going to  
21 object to the extent you are asking about privileged  
22 communications between me and Mr. Garcia. And, Ben, I'm  
23 going to ask you -- no, it's okay. I'm going to ask you  
24 not to answer questions about our engagement agreement.

25 THE WITNESS: Hello?

Page 63

1 MR. GABER: Yeah. I'm sorry. I'm just  
2 taking a moment to think.

3 THE WITNESS: I didn't know if something  
4 went wrong again, so I apologize.

5 MR. GABER: No, your side's working good.

6 THE WITNESS: Am I able to get a copy of  
7 this deposition very soon?

8 MR. GABER: The one that you're taking right  
9 now?

10 THE WITNESS: Yes.

11 MR. GABER: Yeah, you'll get a copy, and  
12 your counsel will be able to order a rush copy too, if  
13 you'd like, which would be quicker than the normal  
14 course.

15 THE WITNESS: Okay.

16 BY MR. GABER:

17 Q. So have you talked to Mr. Ybarra at all about  
18 the -- what he would like to have happen to the map or  
19 anything about the redistricting plan?

20 A. No.

21 Q. And what about Mr. Trevino?

22 A. No.

23 Q. And Ismael Campos?

24 A. No.

25 Q. And just so I understand, did you speak to

Page 64

1 anyone at the Holtzman Vogel law firm, other than Dallin  
2 Holt?

3 A. Not that I'm aware of. I don't think so.

4 Q. Did you speak with Mr. Jason Torchinsky?

5 A. I don't think so. I mean, like I said, I --  
6 the communication was -- you know, there's -- no, not  
7 that I'm aware of.

8 Q. And what about Phil Gordon?

9 A. No.

10 Q. And, Mr. Garcia, do you have a copy of your  
11 engagement letter there with you for today's deposition?

12 A. The subpoena?

13 Q. No. Your -- your retainer agreement with your  
14 lawyer.

15 A. Oh, do I have a copy of my -- my retainer  
16 agreement? Yes, I do.

17 Q. And that's -- that's there with you for today's  
18 deposition?

19 A. The agreement for legal representation? Yes.

20 Q. Yes.

21 A. Yes.

22 MR. STOKESBARY: Yeah, again, I'm going to  
23 object to the extent this calls for privileged  
24 attorney-client communication and, Mr. Garcia, ask you  
25 not to discuss our engagement agreement.

16 (Pages 61 to 64)

Page 65

1 BY MR. GABER:

2 Q. And my question, Mr. Garcia, is just that it's  
3 there with you. You brought it with you to the  
4 deposition; is that right?

5 MR. STOKESBARY: You can answer that  
6 question, Ben.

7 A. Oh, yes.

8 BY MR. GABER:

9 Q. And have you reviewed that during the course of  
10 the deposition?

11 A. No. Because my glasses -- and I apologize. I  
12 just got these from the VA, so I assume they were --  
13 there wasn't a problem with them, but --

14 Q. My uncle has had the same problem with his VA  
15 glasses, so I understand.

16 A. I'm having a little bit of problem.  
17 Everything's a little fuzzy on the reading.

18 Q. Mr. Garcia, are you aware that Mr. Stokesbary  
19 serves in the legislature?

20 A. That, I didn't know, no.

21 Q. You did not know that?

22 A. No, I did not know that.

23 Q. So I gather you're not aware that he voted in  
24 favor of the plan that you are challenging?

25 A. No, I was unaware of that.

Page 67

1 Q. But as you sit here today, I gather you're  
2 pretty concerned about the situation?

3 A. Yes.

4 Q. Okay. I want to shift gears a little bit and  
5 talk a little bit about your experience running as a  
6 candidate in the area and your campaign and your  
7 familiarity with the area, if that's okay with you.

8 So you ran for congress in 2022; is that right?

9 A. That is correct.

10 Q. And was that your first time running for  
11 office?

12 A. Yes.

13 Q. And how did you decide to get involved in that  
14 race?

15 A. I had helped a candidate, a fellow Republican,  
16 in 2016, and we got to the primary, and I felt that  
17 representation was -- was not there in -- in all  
18 manners.

19 And I wanted to reach out to as many people as  
20 possible, and to put my -- the reason why I felt I was  
21 the best candidate to go ahead and represent the 4th  
22 Congressional District.

23 So I got an idea from, like I said, another  
24 candidate who was involved in the race quite a bit, and  
25 seeing how the process went, so I could learn, if I were

Page 66

1 Q. How does that make you feel?

2 MR. STOKESBARY: Sorry. Once again, slow on  
3 the mute button, but objection that it misstates the  
4 evidence.

5 BY MR. GABER:

6 Q. And you can go ahead and answer.

7 A. Not very good.

8 Q. And you cut out a little bit. Not -- did you  
9 say not very good?

10 A. Not very good.

11 Q. Why is that?

12 A. The Complaint that was filed, I would assume  
13 that my attorney would be in line of -- of my support.

14 Q. And to make it clear, this is the first time  
15 you're learning that there was a vote taken in the  
16 legislature, that Mr. Stokesbary is a legislator, and  
17 that he voted in favor of the plan; is that right?

18 A. That's correct. This is the first time I've  
19 heard of it.

20 Q. Given some of the things you've learned today  
21 for the first time regarding your counsel and their  
22 representation in the other parallel lawsuit, do you  
23 have any plans for how you want to proceed in this case?

24 A. I'll have to refer to my legal counsel and talk  
25 to him after.

Page 68

1 going to run, how to go about it and not just put my two  
2 feet in there and pray for the best, you know.

3 Q. And this was a campaign against the incumbent  
4 Republican, is it Dan Newhouse?

5 A. That is correct.

6 Q. And how many Republican candidates were running  
7 in that race?

8 A. There were a number of Republican candidates,  
9 about five, including myself.

10 Q. And were -- you're Latino; is that right?

11 A. That is correct.

12 Q. And were the --

13 A. Well, I'm of Seminole-Negro descent and Latino.

14 Q. Were the other Republican candidates in that  
15 primary white?

16 A. Yes, that is true.

17 Q. All of them?

18 A. Yes.

19 Q. Now, I spent some time reviewing some of your  
20 campaign materials and some of the videos and whatnot.

21 A. I hope you didn't find it offensive. Sorry. I  
22 just had to put that in there, so I apologize.

23 Q. No, I -- I did not, and I enjoyed it.

24 One of the videos was -- you conducted it in  
25 Spanish, and said something along the lines of that you

17 (Pages 65 to 68)



Page 69

1 were the only candidate who was running for all the  
2 people, including for the Latino people.

3 Do you recall that?

4 A. Yes.

5 Q. What did you mean by that?

6 A. We are a fairly large minority district. The  
7 state -- we're the second largest state population.  
8 Latinos is second largest state population. We are  
9 40 -- approximately 40 percent of the -- of the  
10 population in the 4th Congressional District.

11 None of our representatives that have been  
12 house reps truly understand the need to reach out to all  
13 the people, understand -- you know, for example, when do  
14 you ever see any of the house reps ever go to a  
15 taqueria, you know? Mingle within the -- their -- their  
16 people that they're supposed to represent, you know?

17 For me, there is a disconnection. Although  
18 things have gotten much better. I mean, I was Ebony  
19 Senate rep in college. I was part of LULAC, part of the  
20 Republican National Hispanic Assembly.

21 My desire is that all people vote, whatever  
22 that may be, but that they register to vote and that  
23 they vote. But our -- it's my personal belief that our  
24 representatives really don't understand the overall --  
25 the people in their district, and they don't reach out

Page 71

1 Senate rep in college. I was part of LULAC, part of the  
2 Republican National Hispanic Assembly.

3 "My desire is that all people vote, whatever  
4 that may be, but that they register to vote and that  
5 they vote. But our -- it's my personal belief that our  
6 representatives really don't understand the overall --  
7 the people in their district, and they don't reach out  
8 to them. And that's missing. And so --"

9 E X A M I N A T I O N (Continuing)

10 BY MR. GABER:

11 Q. So we're waiting at the edge of our seats,  
12 Mr. Garcia, to find out what followed "and so."

13 A. And so that is one of the reasons why I decided  
14 to run for U.S. Congress. I've got the experience.  
15 I've done over a thousand loans for folks to be  
16 homeowners in this state, with the federal government,  
17 the GRH program. I've done AmeriCorps. I've worked in  
18 the school districts. I'm 51, so I do have a prior work  
19 background.

20 And I feel that there is a disconnect, but I  
21 believe that that can be changed, and that's with a  
22 sincere person who -- who has made a difference in --  
23 whether it be for my country or whether it be in my  
24 community. I have showed lifelong of making a  
25 difference.

Page 70

1 to them. And that's missing. And so --

2 MR. GABER: He may have frozen again. Last  
3 time he worked it out and got himself back on, so maybe  
4 we take a -- go off the record for a moment.

5 (Recess from 10:52 a.m. to 11:06 a.m.)

6 MR. GABER: So I guess back on the record.  
7 Cindy, are you able to read back -- I know we cut out as  
8 Mr. Garcia was answering the last question. Cindy, are  
9 you able to read back my question and his answer, as far  
10 as he got?

11 THE COURT REPORTER: "Question: What did  
12 you mean by that?

13 "Answer: We are a fairly large minority  
14 district. The state -- we're the second largest state  
15 population, Latinos is second largest state population.  
16 We are 40 -- approximately 40 percent of the -- of the  
17 population in the 4th Congressional District.

18 "None of our representatives that have been  
19 house reps truly understand the need to reach out to all  
20 the people, understand -- you know, for example, when do  
21 you ever see any of the house reps ever go to a  
22 taqueria, you know? Mingle within the -- their -- their  
23 people that they're supposed to represent, you know?

24 "For me, there is a disconnection. Although  
25 things have gotten much better. I mean, I was Ebony

Page 72

1 Q. And is it your -- from living and from working  
2 and from running as a candidate, I gather it was your  
3 impression that there -- there's a lack of attentiveness  
4 to the Latino community from our politicians?

5 MR. STOKESBARY: Objection to the extent  
6 that calls for a legal conclusion.

7 A. I think, in all perspective of our -- most of  
8 our representation, they no longer represent the average  
9 person or that of the lower class.

10 BY MR. GABER:

11 Q. And so is it your experience that, in  
12 particular, Latino voters in South Central Washington  
13 oftentimes have a lower socioeconomic status than their  
14 white counterparts?

15 MR. STOKESBARY: Objection. Calls for  
16 speculation.

17 A. I can't answer that in that sense to know -- to  
18 have the experience that I could say that, you know, a  
19 large -- the -- the -- you know, economically they're in  
20 lower class zones; in other words, their income is not  
21 as high for all people.

22 You know, you can take a look at Toppenish  
23 School District. You could take a look at some of the  
24 Yakima school districts. There's much poverty across  
25 the board.

18 (Pages 69 to 72)

Page 73

1 BY MR. GABER:

2 **Q. And is that the case in the Pasco area as well?**

3 A. Tri-Cities tends to do better, but I can't say  
4 that that is, because I wouldn't know, but I can say in  
5 Yakima, Lower Valley, free school lunch, you know. You  
6 can see a lot of that and that purpose, but I can't say  
7 I would -- I could say, you know, Tri-Cities itself.

8 **Q. Okay. But the -- the Yakima and the Lower**  
9 **Valley, the Latino communities would share that in**  
10 **common?**

11 A. Yeah, most would have that in common in that  
12 demographic area.

13 **Q. And you were speaking in particular about how**  
14 **you would be the only candidate in your primary race who**  
15 **would be able to represent the Latino people.**

16 **Was it your impression that the candidates you**  
17 **were running against were not really campaigning for**  
18 **Latino votes in the primary?**

19 A. No. What I'm trying to say is that I want more  
20 participation, and it's time for -- to try to get  
21 everybody registered, which is, you know, a large Latino  
22 population. You know, you want to see Latino  
23 representation in leadership positions, but you want to  
24 make sure that you do it through a fair process under  
25 our constitution.

Page 74

1 So you're representing everyone. I want to  
2 make that clear. You're representing everyone, and --  
3 and you're doing what's in the best interest of your  
4 district, you know, or 4th Congressional District, I  
5 should say. So you're representing everybody.

6 What I want to see is more inclusion across the  
7 board, you know, and that's why, when I went out there  
8 to try to register voters, I didn't care who you are. I  
9 want you to register, please. It's that important.

10 **Q. I agree with that. I get that.**

11 **Is it your impression that, in particular,**  
12 **there's lower voter registration among Latino voters in**  
13 **Yakima County than is the case with the proportion of**  
14 **white voters who are registered to vote?**

15 A. It's been proven in the past, and you can look  
16 at some of the news articles that Yakima Herald has put  
17 out, that, you know, even though there's a large  
18 representation in the Latino population, that when it  
19 comes time to vote, unfortunately, there hasn't been  
20 large numbers in being able to vote for whatever  
21 candidate.

22 **Q. Right. So that's lower voter turnout among**  
23 **Latino voters in Yakima area, as well as lower voter --**

24 A. Lower turnout in overall aspects.

25 **Q. Okay.**

Page 75

1 A. Yeah, in the 4th District.

2 **Q. Now, I read a newspaper article about a**  
3 **controversy surrounding telephone messages that**  
4 **supporters of yours wanted to be put out by the State**  
5 **Republican Party, and there was an article where you**  
6 **were criticizing the party for its actions there.**

7 **Do you recall that?**

8 A. That's correct. Absolutely. That's correct.

9 **Q. And one of the things that you alleged was that**  
10 **the State Republican Party was trying to suppress Latino**  
11 **voters in the primary.**

12 **Do you recall that?**

13 A. Absolutely. That is correct.

14 **Q. Can you just talk a little bit, explain that --**  
15 **that event and -- and what --**

16 A. I will. First of all, I was one of five  
17 Latinos in the nation to get supported out of Latino  
18 StrikeForce out of Texas. Now, the RNC was involved to  
19 help use the -- the phone bank system of the Republican  
20 Party.

21 Now, we created our message, both in Spanish  
22 and English, and we had approval to do this. And so for  
23 every registered 4th District Latino Republican, we put  
24 on that phone bank.

25 Now, this phone bank system was to help us to

Page 76

1 get our vote out. And so the message was changed,  
2 re- -- an RNC member who worked with the Washington  
3 State Republican Party, with Caleb, who's the chairman  
4 of the Washington State Republican Party and his  
5 staffing, we had to get approval to use that, and we  
6 finally did.

7 It was greatly delayed, for about three months.  
8 Not only was it delayed, but when we got the messaging  
9 out there for the voicemail, we had done over 10,000  
10 plus phone calls.

11 And they switched the voicemail message. And  
12 so it looked like Washington State Republican Party, a  
13 general message, instead of saying, vote for Benancio  
14 Garcia, 4th Congressional District candidate, and here's  
15 the reason why.

16 Now, the only reason we found out about that  
17 was because an RNC member quit. Gave me a phone call,  
18 said, Ben, I quit because the Washington Republican  
19 Party switched your voicemail. That is suppressing the  
20 Latino vote.

21 Then there is the second aspect of things,  
22 number two. They had funds -- Washington State  
23 Republican Party had funds to hire two supervisors, one  
24 in Yakima and one in Wenatchee, to register Republican  
25 Latinos. They hired nobody.

19 (Pages 73 to 76)

Page 77

1 Me being the only Latino representative, it  
2 would have favored. Dan Newhouse would no longer be  
3 your congressional victor. It probably would have been  
4 Culp. But they greatly affected this election, the  
5 outcome, and suppressed the Latino vote.

6 **Q. And was it your sense that that was sort of a**  
7 **coordinated effort in the State Republican Party, to**  
8 **suppress the Latino vote in the area?**

9 A. What I will say is this: They say it was a  
10 mistake. There's no mistakes in a congressional race  
11 like this. We have a third party out of Texas that told  
12 them there was no misunderstanding to -- and --  
13 misunderstanding about this.

14 As a matter of fact, you know, you probably  
15 didn't see this, since you did your research on me. Did  
16 you see the fact that I saved somebody's life in a --

17 **Q. I did --**

18 A. -- mass shooting? You know?

19 **Q. I did see that, and that was extraordinarily**  
20 **impressive.**

21 A. You know, I thank God that I was there at the  
22 right place, right time. My -- my thing is like it was.  
23 I didn't change. I believe in seeing all people's  
24 rights. I believe strongly in the civil rights.

25 That's why I was Ebony Senate rep in college.

Page 78

1 And I feel -- and it doesn't matter which party it is.  
2 I will do the right thing. For our voice not to be  
3 heard and what I feel is suppression, we can disagree  
4 upon this, and I welcome a lawsuit, you know.

5 We did not get fair representation in this 4th  
6 Congressional District race. And it's not on the  
7 candidate. This was done -- they can say, well, Ben,  
8 you know you need to pay for that.

9 At no point in time, especially since I was  
10 supported by a third party who is well connected to the  
11 RNC, was that ever brought up. Why didn't you ask me,  
12 we can't do this, instead of having my volunteers phone  
13 bank, and instead of having my voice message out, it was  
14 for the Washington State Republican Party. Not  
15 acceptable.

16 **Q. And is it the case that you didn't find out**  
17 **about this until after this had -- the decision had been**  
18 **made not to use your message?**

19 A. It was before. It was before the decision. I  
20 found out during the campaign process, but, you know,  
21 those are -- are strong challenges when you've already  
22 committed so many hours and so much in volunteers to  
23 have to overcome. You can't take that time back.

24 **Q. Right.**

25 A. The impact has already been done.

Page 79

1 **Q. You said the RNC member told you he was**  
2 **quitting because of this; is that right?**

3 A. That's my understanding.

4 **Q. And that was because of the suppression of the**  
5 **Latino vote in your race?**

6 A. Because of what happened in my race, yes,  
7 that's correct.

8 **Q. Has anything been done to rectify the situation**  
9 **with the State Republican Party?**

10 A. What I -- what I do want to do is go ahead,  
11 after I'm completely settled in in my home and -- and  
12 take care of other personal matters, I will go ahead and  
13 then write a letter to the RNC, write a letter to the  
14 state chairman, and write a letter to the 4th District  
15 chairmen, chairpersons, and let them know about what has  
16 occurred, what has happened.

17 This isn't just my word. You know, to be  
18 supported, one in five in the nation, Latinos, that's a  
19 privilege, and to know that the phone bank system does  
20 work because they have a history of getting winning  
21 candidates.

22 So I will be putting that out there, and I will  
23 leave it in the hands of the Republican Party on what  
24 they want to do, but I will certainly entertain the fact  
25 that I may take legal aspects on this in some manner

Page 80

1 because what occurred is not acceptable. And I am a  
2 fighter, you know. And if it's wrong, I will fight it.

3 **Q. Did you hear from Latino voters who were upset**  
4 **that this had happened in your race?**

5 A. A lot of people were upset. I gave a speech  
6 about it in Ellensburg -- not Ellensburg. I gave a  
7 speech about it -- oh, gosh, what district? I gave a  
8 speech about it, and some of the candidates had  
9 questions, you know, like what are you talking about  
10 exactly here? You know.

11 And this, like I said, was later on toward --  
12 you know, toward the end, where, you know, you had to  
13 make it clear how the facts have occurred. And the  
14 people were upset, you know.

15 And what was wonderful is, you know, to see  
16 some of the candidates say, what exactly are we talking  
17 about here, whether it was Culp's people or whether it  
18 was Sessler's people, you know, or it was people in  
19 general that were there asking questions, you know, "Are  
20 you saying this happened?"

21 I go, "Absolutely, and this is why."

22 And it's just not my word. You don't give us  
23 access to your phone bank system -- because they, like  
24 the Democrat Party can go ahead and say, hey, let me  
25 see -- look at your -- look at your phone system, you

20 (Pages 77 to 80)

Page 81

1 know? Let me see what you got out there, you know.  
 2 Obviously I had access to it. Obviously we  
 3 created within our district the phone bank system and  
 4 those phone numbers. And it was to go ahead and give  
 5 knowledge that I am running.

6 And the goal was to get minimal to 50,000 phone  
 7 calls, you know, which in a midyear election can turn  
 8 toward -- favorable toward you. So...

9 **Q. Did you, like, communicate with people about**  
 10 **this issue? Did you send text messages or email with**  
 11 **people about your concerns about the --**

12 A. I -- I did send emails probably to some of the  
 13 newspapers, you know. And really they didn't have, you  
 14 know -- I shouldn't say I personally did, but some of --  
 15 of the folks that my staff had, you know.

16 Because we're concerned. You know, we're --  
 17 we're concerned, one, how our volunteers were used.  
 18 We're concerned about the communications and lack of, to  
 19 not be given notice that our voicemail was not done, and  
 20 this is through the Washington State Republican Party.  
 21 When did this change occur? Why did it occur?

22 Couldn't get an answer really clearly, as -- if  
 23 you saw the newspaper, it was quite ambiguous, you know.  
 24 But the bottom line is, you got your hand caught in the  
 25 cookie jar. You didn't expect me to ever know about it,

Page 82

1 but I found out.

2 And that was because someone was being honest  
 3 and decided to leave their RNC, and it just changed his  
 4 life, you know, in all honesty. He's not returned back  
 5 to politics.

6 **Q. Who is the RNC member who left?**

7 A. Manice (phonetic) Perry. I would spell it  
 8 correctly for you, but I'd have to get off-line.

9 **Q. No, you're -- we don't expect you to try to use**  
 10 **your phone in your current circumstance.**

11 A. Yeah, I'm in my car right now. I didn't think  
 12 this would ever be happening. Wow.

13 **Q. We definitely appreciate it.**

14 **Have you spoken or are you aware of any other**  
 15 **Republican Latino candidates who have faced similar --**  
 16 **or, you know, the same type of problem with the State**  
 17 **Republican Party?**

18 A. Well, I will say I was told about a situation  
 19 in King County, and that was through Sea Chan, who  
 20 happened to run for the 4th Congressional District, I  
 21 think it's the 4th, in King County.

22 And so he has a -- he has a good knowledge base  
 23 of -- of what occurred to a candidate who was Asian, you  
 24 know. So, you know, we had quite a long discussion on  
 25 things.

Page 83

1 We want to fix things. We're both military.  
 2 We want to fix things. We believe in this country.  
 3 We -- we, you know, put our lives out there for it. I  
 4 wear the scars on my body for it, you know.

5 To give up a federal position because things  
 6 are broken, you don't take lightly a career and throw it  
 7 away. You know, I'm not here to be liked. I'm here to  
 8 fight for the right thing, and that's why I'm here.

9 **Q. Now, Mr. Hughes asked you a bit about Senator**  
 10 **Torres, and I gathered from your answer and sort of your**  
 11 **expression that she might not -- you might not align**  
 12 **politically. Am I right about that?**

13 A. Right. But it's not -- it's not necessarily,  
 14 you know -- irregardless of who the candidate is, I  
 15 believe the district was illegally designated, done, and  
 16 at the time my lawyer did too.

17 And so, you know, I base it on my Complaint.  
 18 It don't matter who the representative is, irregardless.  
 19 I want this to go all the way through to determine  
 20 whether or not -- if I'm wrong, then I am. If I'm  
 21 right, then I am. But I want the right thing to happen.

22 **Q. So my question is less about the -- like**  
 23 **setting aside the district, and then just talk about**  
 24 **Senator Torres in terms of, you know, her political**  
 25 **beliefs and yours.**

Page 84

1 **Is that -- is she someone who you would choose**  
 2 **to be your representative in the state legislature?**

3 A. You know, I believe I voted for her. I think I  
 4 did. I think she is a Republican. I believe I voted  
 5 for her. I spoke to her just a bit, not -- I mean, I  
 6 shook her hand. That was about it.

7 We were busy at the event, so -- yeah, I -- I  
 8 fine line item went through all the candidates, you  
 9 know, and, you know, I -- I try to vote for who I think  
 10 is the best option, you know.

11 I am Republican, but there are reasons for  
 12 that. But I have a history of voting both ways. You  
 13 know, I am conservative, but I want to see the people  
 14 that -- that are conservative and that I think will do  
 15 the best job. And if they did a good job on both ends,  
 16 I wouldn't be here today.

17 **Q. Do you know how long Senator Torres has**  
 18 **identified as a Republican?**

19 A. You know, I didn't even know who she was.  
 20 Probably as long as she had that meeting with Jim  
 21 Honeyford.

22 **Q. Are you aware of views in the community that**  
 23 **she might not -- her ideology may not, in fact, be**  
 24 **Republican, but that she was run as such?**

25 A. You know, I didn't -- to be honest, I didn't

21 (Pages 81 to 84)



Page 85

1 stay focused on her, for a number of reasons, but on  
2 other people, because I -- I was very busy running my  
3 race, trying to make meetings, and running in -- up and  
4 down what is our largest congressional district in the  
5 state.

6 **Q. And am I right that --**

7 A. Yakima County's pretty large.

8 **Q. Am I right that Senator Torres was the only**  
9 **Republican candidate available for you to vote for, for**  
10 **that race?**

11 A. She was. Yeah, she was the only one. Now,  
12 that's after Senator Honeyford -- State Senator  
13 Honeyford had decided that he wasn't going to run again,  
14 after the fact. But that's politics for you.

15 **Q. Now, you mentioned that you had sent some**  
16 **emails, or you -- you or your staff had sent some emails**  
17 **to some newspapers about the controversy with the State**  
18 **Republican Party.**

19 **Did you text people about that, as well?**

20 A. Did I what?

21 **Q. Did you send text messages on your phone to**  
22 **discuss that issue with friends, colleagues, anyone?**

23 A. I did with the Latino StrikeForce because they  
24 were the ones that endorsed me. The moment I found out  
25 was -- like I said, I was shocked that this would occur,

Page 86

1 you know. We're talking a U.S. congressional race.

2 We're not talking -- even if it's a  
3 misunderstanding, whatever race it may be, the  
4 volunteers that put their time in, the support you got,  
5 you know, it affects things, you know. So yeah.

6 **Q. Now, you received two subpoenas; is that right?**

7 A. I'm sorry.

8 **Q. So you're here talking to us today, or talking**  
9 **to me, at least, because you received a subpoena to**  
10 **testify; is that right?**

11 A. Yes. There's another one, I think on Monday or  
12 Tuesday, via Zoom.

13 **Q. So that -- okay. So let me just -- how -- did**  
14 **you -- so you received two subpoenas; right? One was**  
15 **for your deposition testimony and one was for documents.**

16 **Do you understand that?**

17 A. Right. Right. And -- and the documents, I  
18 need time to get that because I still ain't moved in my  
19 house. So I have a lot of things packed away in  
20 storages. And, you know, I don't even have a printer  
21 right now. I need to go buy ink for it, but after --  
22 you know, what I'm saying is -- because -- we barely  
23 made it in time to move into our home.

24 **Q. Sure. Sure. And then --**

25 A. We got construction going on still. So it's --

Page 87

1 you know, we're glad to be home. We've moved five  
2 times. A little exhausted, you know, putting my family  
3 through, you know, with what occurred with the house  
4 fire, and still having to meet the requirements to get  
5 it all fixed. It's almost there.

6 And, you know, the documents, as far as  
7 basically talking to a couple of reporters, you know,  
8 there was one news article that I'm aware of that they  
9 put it out there, and basically they were like, "Garcia  
10 was angry," you know.

11 Well, not so much angry in the sense that  
12 you're displeased with the fact that this can occur and  
13 you want fair play. And I believe -- I don't cheat, you  
14 know. That's not who I am.

15 And I believe in the American dream, and I  
16 believe that we -- you know, that the framers of this  
17 country created the greatest -- second greatest document  
18 in the world. The first is the holy scriptures. Second  
19 is our constitution.

20 **Q. And so it sounds to me, at least with respect**  
21 **to the -- to your -- the 4th District Republican primary**  
22 **and the -- your experience with the effort to suppress**  
23 **the Latino vote there, that that's an example of an**  
24 **unequal electoral opportunity for Latino voters in the**  
25 **area; is that right?**

Page 88

1 **MR. STOKESBARY: Objection --**

2 A. Yes.

3 **MR. STOKESBARY: -- as to form.**

4 A. Sorry.

5 **BY MR. GABER:**

6 **Q. Go ahead, Mr. Garcia.**

7 A. I agree. I agree. I think the head of  
8 Washington State Republican Party has its challenges.

9 **Q. And that -- those challenges are negatively**  
10 **affecting the Latino voters where you live; is that**  
11 **right?**

12 A. I agree.

13 **Q. Now, I understand that -- when did you -- when**  
14 **did you see the -- the copy of the subpoenas for the**  
15 **first time?**

16 A. I think it was Tuesday, last Tuesday, I  
17 believe. It was served around 7:00 in the evening, I  
18 think.

19 **Q. So you saw those when the process server came**  
20 **to the house; is that right?**

21 A. Yes. The person serving me the documents,  
22 yeah.

23 **Q. So you didn't get those ahead of time from your**  
24 **counsel?**

25 A. No.

22 (Pages 85 to 88)



Page 89

1 Q. Well, I can tell you your counsel's had them  
2 for two weeks, and I understand the need for more time,  
3 particularly given the circumstance with the fire at  
4 your house.

5 I would, you know, request that we -- and would  
6 you be agreeable to maybe sit with us again if we have  
7 any questions based on what's in those documents?

8 A. I would. There were some text messages that  
9 were sent, and, you know, I made -- we made some phone  
10 calls to -- to the fact, you know, and it was basically  
11 one reporter that basically, you know -- and it was just  
12 a phone call.

13 So -- they were trying to understand how this  
14 was suppressing the vote, you know, or they wanted a  
15 complete, you know -- like, who's the one that did it?  
16 Well, you know -- evidence on that.

17 And I'm like, wait a minute. We've got a video  
18 on the training. We've got an email that -- from the  
19 Latino StrikeForce. We had access to their phone  
20 banking system.

21 We created our own district in the sense of all  
22 registered Latino voters, Republican voters. 10,000  
23 phone calls were made and the voicemail was switched.  
24 You don't have access to all that, and not have their  
25 permission for it, and there's no misunderstanding of

Page 91

1 verbally given me the -- why he quit, but -- in his text  
2 message, it was a little different, that they removed  
3 the Spanish version, you know, on the text message.

4 So, you know, we both were pretty disheartened  
5 in -- in what we want to see in leadership. How could  
6 you not let the Latino StrikeForce know? How can you  
7 not let the RNC member know? How can you not let my  
8 staff or myself know? That's a big, big mistake. Out  
9 of respect of me running for congress, how can you not  
10 let any of these organizations know?

11 Q. And so the Spanish language part was removed as  
12 well?

13 A. Yes.

14 Q. And just to clarify, the -- you know, I know  
15 you're -- the Congressional District 4 is larger than --

16 A. It's the largest.

17 Q. Yeah.

18 A. It's the largest in the state.

19 Q. But it covers all of Yakima County; is that  
20 right?

21 A. Yes.

22 Q. And then it also includes Benton County and  
23 Grant County; is that right?

24 A. Yeah. All the way from the Canadian border,  
25 from Okanogan, basically almost central, almost Central

Page 90

1 why we're doing it.

2 So, you know, it's just not acceptable. If  
3 they wanted to say no because maybe they have a  
4 candidate dog in the fight, that they would hopefully  
5 let you know, then just say no.

6 But I know -- I have a hard time trusting  
7 politicians, and I have a hard time trusting lawyers,  
8 you know. Just being honest. And -- so, you know, I  
9 guess I'm the little guy fighting for the big dream, but  
10 I -- I believe that I will be where I need to be in a  
11 little while because I'm a big fighter.

12 Q. Well, I have no doubt about that. With respect  
13 to the -- sorry. Back to the text messages. It sounds  
14 like there's some texts that you exchanged with the  
15 Latino Task Force people; is that --

16 A. StrikeForce.

17 Q. StrikeForce?

18 A. Latino StrikeForce out of Texas.

19 Q. Okay.

20 A. Yes, there is, you know.

21 Q. Okay.

22 A. Yes, there is.

23 Q. And you still have all of those?

24 A. I should have the texts because, like I said, I  
25 was on the phone the moment I found out, and Manice had

Page 92

1 Washington, down to the Columbia. Klickitat, Benton,  
2 Franklin, Adams, Grant, Okanogan, Yakima. At one point  
3 it was parts of Walla Walla, a little tiny part, you  
4 know.

5 Q. And so Pasco is in the district as well; right?

6 A. Absolutely.

7 Q. And Othello and Adams County?

8 A. Yes.

9 Q. And then all of -- all of Yakima. Mattawa's in  
10 the district?

11 A. Yes.

12 Q. So there's quite a bit of overlap between  
13 District 15 in the legislative map and District 4 for  
14 the congressional plan?

15 A. Yeah.

16 Q. Now, I understand that you need time to look  
17 for the documents. Have you looked through them at all  
18 in response to the subpoena --

19 A. No.

20 Q. -- for today?

21 A. No, no.

22 Q. Okay.

23 A. And to be honest, I wasn't sure what -- what  
24 you would want from me in documents, or how the  
25 question -- you know, the -- seriously? She just banged

23 (Pages 89 to 92)

Page 93

1 my car. Sorry. Anyways, I'm sorry. What was the  
2 question again?

3 **Q. I think I had asked whether you had looked**  
4 **at -- looked for the documents before today.**

5 A. No. I mean, well, I didn't simply because I  
6 wasn't sure what was going to be asked of me, you know,  
7 and having so much boxed up and five moves, I would have  
8 to find out where to look, you know.

9 **Q. But you have your phone and, you know, that --**

10 A. Yes.

11 **Q. -- would have the text messages and whatnot,**  
12 **and your email you have access to now; right? We could**  
13 **start with the electronic communications --**

14 A. Yeah, my -- right. But my email for the  
15 congressional race is getting to the point to where I  
16 need to get ready to pay for another year, so I don't  
17 know if I'm going to, you know, at this point because  
18 it's just an email. But still it's a little bit of  
19 money out of the pocket, you know.

20 **Q. So it probably makes sense to start there and**  
21 **collect those so that you get them before you have to**  
22 **pay to host that again, so that --**

23 A. Right. And I hope to get to them by next week,  
24 you know. Like I said, I don't got my computer up yet.  
25 We still have some work to be done in the house. But I

Page 94

1 will be getting -- I can get to them.

2 **Q. Okay.**

3 A. You know, and I think basically everything was  
4 just done by phone conversation, other than a few texts,  
5 which had to do with the Latino StrikeForce and had to  
6 do with Per- -- Manice in regards to that.

7 **Q. So I want to -- I know this is difficult for**  
8 **you because you're in your car on the phone, but I'm**  
9 **going to share my screen and see if you can see it.**  
10 **Just one moment.**

11 **So before I do that, so the complaint you had**  
12 **about -- setting aside your thought that it's a racial**  
13 **gerrymander, District 15 --**

14 A. Okay.

15 **Q. -- your geographic complaint, as I understand**  
16 **it, is it's stretching, you know, from Yakima County**  
17 **further over toward Franklin County? Is that --**

18 A. Yes. And again, I'm seeing a little fuzzy on  
19 the reading thing, you know, because the glasses I  
20 thought that were supposed to be my prescription aren't  
21 quite -- they're -- they're not -- I'm going to have to  
22 send them back.

23 **Q. So I've pulled up a map on the screen. Can you**  
24 **see that?**

25 A. Yeah, I can see the red and -- and the lines,

Page 95

1 but I -- I -- I'm having trouble distinguishing the  
2 lines a little bit. I apologize.

3 **Q. No, no worries. So I can kind of explain it to**  
4 **you a little bit. You see the red is in the southern**  
5 **half of Yakima County? Can you see that?**

6 A. Umm --

7 **Q. Maybe -- maybe even pull the phone a little bit**  
8 **closer to you.**

9 A. Well, I'm -- yeah, I mean, I'm sorry. It's --  
10 okay. Go ahead. I'm sorry. I'm just...

11 **Q. So do you see where the red area is situated on**  
12 **the map, in -- primarily in Yakima County?**

13 A. Yeah. I see. I see the red.

14 **Q. Now, if the district looked something like**  
15 **this, would this resolve your geographic concerns?**

16 MR. STOKESBARY: Objection as to form.

17 A. I -- you know, I got to apologize. I really  
18 can't answer that. I'm having -- I'm just having a lot  
19 of issues reading. I mean, I can't even read the -- the  
20 subpoena and stuff, so I -- I really apologize for that.  
21 I didn't think I -- these glasses -- set of glasses I  
22 brought would -- well, I thought they were meant for me.  
23 Apparently...

24 BY MR. GABER:

25 **Q. Okay. So you can't --**

Page 96

1 A. I'm sorry.

2 **Q. -- see where the red is on the map?**

3 A. No, I -- I see the red, but I'm having trouble  
4 with the lines distinguishing. They're fuzzy.

5 **Q. Okay.**

6 A. I mean, I'm seeing everything fuzzy, and so I  
7 apologize.

8 **Q. Okay. Well, we don't need to keep testing your**  
9 **eyes.**

10 A. Yeah. Sorry.

11 **Q. Did you -- now, earlier we talked about how**  
12 **this is the first time, you know, when I told you, and**  
13 **Mr. Hughes mentioned it as well, about the intervenors**  
14 **and their opposite relief that they want.**

15 **I gather you haven't signed any sort of**  
16 **conflict waiver?**

17 A. No.

18 **Q. And so no -- no conflict waiver --**

19 MR. STOKESBARY: Hold on. Hold on, Mark.  
20 I'm going to object to this question to the extent it  
21 calls for privileged attorney-client communications,  
22 and, Ben, ask you not to discuss any conversations  
23 between us.

24 THE WITNESS: Sorry.

25 MR. HUGHES: I don't think the question

24 (Pages 93 to 96)

Page 97

1 whether there was a conflict waiver is privileged, Drew.  
2 BY MR. GABER:

3 **Q. Yeah. And so, Mr. Garcia, I'm not asking you**  
4 **for any conversations with your attorneys. My question**  
5 **is simply, have you signed any sort of written conflict**  
6 **waiver with your attorneys and with the -- with the**  
7 **parties in the other case?**

8 MR. STOKESBARY: Again, I would say that  
9 things he's signed that exist between me and him are --  
10 are the definition of privilege.

11 MR. HUGHES: Well, a conflict waiver goes to  
12 the -- the outer bounds of the privilege relationship;  
13 right? So if there is -- if there is a conflict waiver,  
14 I would think that would be -- well, just sort of  
15 freestyling here, I guess. I wouldn't say the existence  
16 of a conflict waiver falls within the privilege, but --

17 MR. GABER: I think we have the answer on  
18 the record.

19 BY MR. GABER:

20 **Q. How many times during the course -- since**  
21 **you've filed the lawsuit, how frequently have you spoken**  
22 **with Mr. Stokesbary?**

23 A. Since the filing of the lawsuit, so when the  
24 Complaint was filed, after that? Is that what you mean?

25 **Q. Correct.**

Page 98

1 A. I think it was two more times last week, like  
2 Thursday or Friday or -- or Monday. For sure Monday.  
3 It was late last week.

4 **Q. And so that -- between the filing of the**  
5 **lawsuit and the spring of 2022, the next time you spoke**  
6 **with your attorney was last week?**

7 A. Yeah.

8 **Q. And did you call him --**

9 A. After I --

10 **Q. -- or -- I didn't mean to interrupt. Go ahead.**

11 A. No, I -- I had -- he returned my call.

12 **Q. So you reached out to him last week?**

13 A. Yeah. Yeah, I did.

14 **Q. Was that after you'd received the subpoena from**  
15 **the process server?**

16 A. Yes.

17 **Q. Did anyone tell you how to attend today's**  
18 **deposition?**

19 MR. STOKESBARY: Again, to the extent this  
20 calls for attorney-client communication, I'm going to  
21 instruct you not to answer this, Ben.

22 MR. GABER: I don't think I'm asking for  
23 legal advice. I'm asking if he was told where to show  
24 up today.

25 Does your objection stand to that question?

Page 99

1 MR. STOKESBARY: Yes. I'm going to object  
2 to all of your requests regarding my communication with  
3 my client.

4 BY MR. GABER:

5 **Q. Mr. Garcia, do you understand that you're the**  
6 **holder of the privilege?**

7 A. Yes.

8 **Q. And do you understand that you have the power**  
9 **to determine whether you want to assert that privilege**  
10 **or not?**

11 A. Yes, I -- I will assert the privilege. I'm  
12 going to do what's in my best interest and why I filed  
13 this lawsuit.

14 **Q. And -- but for the record, you were under the**  
15 **understanding that you were required to show up in**  
16 **Tacoma this morning; is that -- is that fair?**

17 A. Well, after -- I had already -- once I got the  
18 subpoena, I had already made the decision I was coming  
19 to Tacoma. I have family up here. I thought, honestly,  
20 I was going to be in a legal office, probably, you know,  
21 under -- not -- not in front of -- oh, my goodness.  
22 Certainly not in front of the coffee shop, Starbucks, or  
23 whatnot.

24 So I had already made the decision that I would  
25 drive up here because it did give me the place,

Page 100

1 location, and it did give me the time and date that I  
2 was supposed to be there, so I had already made those  
3 plans once I had received it.

4 And I understood, under the second subpoena,  
5 that it was requiring documents, but I was going to  
6 request a stay for that because -- simply because I just  
7 got stuff boxed up and the situation of moving five  
8 times, it's going to take me about a month and a half to  
9 get everything all straightened out, you know, for my  
10 family and myself, you know. We still got stuff,  
11 clothing that's boxed here, still got to report all our  
12 property that was damaged. So yeah.

13 MR. GABER: Okay. I'd like to take just a  
14 five-minute break if that's okay with you. I realize --  
15 and I don't want to make -- we're just about done, and I  
16 don't want to make you sit in your car like this for  
17 longer than you need to.

18 So on behalf of our -- you know, the plaintiffs  
19 in this -- the case that you're not involved in, I want  
20 to thank you for traveling and for going out of your way  
21 today, and for dealing with less than ideal  
22 circumstances. And, you know, I'm sorry that you didn't  
23 know that that wasn't necessary.

24 But let's take a five-minute break and  
25 hopefully we can wrap up pretty soon after that.

25 (Pages 97 to 100)

Page 101

1 Mr. Hughes might have some more questions as well, but I  
2 think -- I think we won't take up too much more of your  
3 time.

4 THE WITNESS: Thank you.

5 (Recess from 11:54 a.m. to 12:01 p.m.)

6 E X A M I N A T I O N (Continuing)

7 BY MR. GABER:

8 Q. Just a couple more questions for you,  
9 Mr. Garcia.

10 I want to ask a little bit about if you have  
11 experience with how the Republican Party operates in  
12 terms of recruiting and getting candidates to run for  
13 the state legislature in the Yakima County area.

14 Do you -- what are your observations about how  
15 that process works? Is it sort of a top-down effort to  
16 kind of get a slate of candidates?

17 MR. HUGHES: Object to form.

18 MR. STOKESBARY: Yeah, objection as to form.

19 BY MR. GABER:

20 Q. And you can answer.

21 A. Oh, okay. Well, you know, pre-COVID, I would  
22 say that there was a lot of -- you know, whether it be  
23 PCOs, or whether it be top-down, say, hey, you know, we  
24 need to continue to reach out to people, to be a more --  
25 more involved.

Page 102

1 After COVID, so much has changed in people  
2 feeling safe and people wanting to participate, you  
3 know. So much has changed after that. And like I said,  
4 I was involved in a congressional race where I was  
5 helping my friend try to get elected in -- in 2015,  
6 2016. And it's just so different nowadays.

7 Give me a moment. I need to plug this in.

8 Q. Sure.

9 A. All right. Hopefully it holds. Shoot. I'm  
10 going to have to go sideways. I apologize for --  
11 because I got a low battery.

12 Q. There won't be much more.

13 A. Okay. And so there -- you know, as far as  
14 recruiting, I think, you know, it's just been a struggle  
15 in -- in getting people to show up to meetings as a  
16 whole.

17 And really, you know, people are trying to  
18 find -- how do we get more -- more of the community to  
19 get involved in not just our party, but involved in  
20 politics as a whole.

21 You know, you have an event. The numbers  
22 aren't what they used to be. So more than anything,  
23 COVID's had its effect in the way our lives are, more  
24 than anything.

25 That has nothing do with the parties so much.

Page 103

1 It just has greatly affected people -- you know, more  
2 concerned about their health, fearful of things. You  
3 know, things aren't quite as normal as they used to be  
4 before the COVID pandemic. So it's a challenge across  
5 the board.

6 Q. Who is paying for your lawyers in this case?

7 A. I don't know.

8 Q. Is it your understanding that someone or some  
9 entity is --

10 A. Yes. Some -- someone or some entity is, yes.

11 Q. Do you know if that's a national organization  
12 or a Washington State-based organization?

13 A. I don't know.

14 Q. Is that information that you would want to  
15 know, to know, you know, where the money's coming from  
16 for your lawsuit?

17 MR. STOKESBARY: Objection as to form.

18 A. Sorry. I'm trying to keep this charged.

19 BY MR. GABER:

20 Q. My question was, is that information that, you  
21 know, you would kind of want to know, to know where the  
22 money that's funding the -- your counsel is coming from?

23 A. I will discuss that with my lawyer. I do --  
24 you know, on that.

25 Q. And I asked you whether you'd spoken to

Page 104

1 Mr. Stokesbary, or how many times since when the  
2 Complaint was filed and today, and you mentioned, I  
3 think, that you had spoken on the phone last week twice,  
4 and that's it.

5 Has there been any emails or letters that  
6 you've received in the mail in that time?

7 A. Prior to that, I believe there was a letter --  
8 I believe there was an email sent, but --

9 Q. When, about, would that have been?

10 A. Maybe six months ago, maybe five months, six  
11 months.

12 Q. So other than that, you've not heard anything  
13 from Counsel in at least six months' time?

14 A. No.

15 Q. How do you know that someone is paying for your  
16 attorneys?

17 MR. STOKESBARY: Objection as to form.

18 BY MR. GABER:

19 Q. And you can answer.

20 A. I can't -- I don't know.

21 Q. You just have an awareness that there is money  
22 being spent?

23 A. I don't know.

24 MR. GABER: I have no further questions at  
25 this time. Mr. Hughes may have a couple additional.

26 (Pages 101 to 104)

Page 105

1 I'm not sure.  
 2 MR. HUGHES: I do, yeah. Just a couple.  
 3 FURTHER EXAMINATION  
 4 BY MR. HUGHES:  
 5 Q. Mr. Garcia, do you know who Dr. Mark Owens is?  
 6 A. No.  
 7 Q. So you've never seen his expert report in your  
 8 case?  
 9 A. The which report?  
 10 MR. STOKESBARY: Objection. Misstates the  
 11 record.  
 12 BY MR. HUGHES:  
 13 Q. You've never an expert report from Dr. Mark  
 14 Owens?  
 15 A. I didn't even know who he was.  
 16 Q. You don't know that -- you didn't know that  
 17 he's been put forward as an expert in your case?  
 18 MR. STOKESBARY: Objection. Misstates the  
 19 record.  
 20 BY MR. HUGHES:  
 21 Q. You can answer.  
 22 A. No, I didn't know. Sorry.  
 23 Q. And you've never paid a bill of his?  
 24 A. No.  
 25 Q. Do you know when trial is scheduled for this

Page 107

1 Q. So you intend to vote in the 15th District --  
 2 15th Legislative District in future elections?  
 3 A. Yes.  
 4 Q. So in your other answers today, you have tried  
 5 to answer all the questions to the best -- best of your  
 6 knowledge; right?  
 7 A. True, yes.  
 8 Q. But is it -- is it impossible for you to be  
 9 100 percent sure regarding things that happened months  
 10 ago?  
 11 MR. GABER: Object to the form.  
 12 THE COURT REPORTER: I didn't hear the  
 13 answer. I got the objection.  
 14 A. Yes.  
 15 MR. STOKESBARY: Okay. Those are the only  
 16 questions I have.  
 17 MR. GABER: I have nothing further. I just  
 18 want to thank you, Mr. Garcia, again, and apologize for  
 19 the circumstances that you find yourself in.  
 20 THE WITNESS: Thank you.  
 21 (Deposition concluded at 12:11 p.m.)  
 22 (Reading and signing was requested  
 23 pursuant to FRCP Rule 30(e).)  
 24 -o0o-  
 25

Page 106

1 case?  
 2 A. No.  
 3 Q. No one's told you that?  
 4 A. No.  
 5 MR. HUGHES: I think that's all I have.  
 6 Thank you.  
 7 MR. STOKESBARY: I -- can I ask just a  
 8 couple questions?  
 9 MR. HUGHES: Of course.  
 10 EXAMINATION  
 11 BY MR. STOKESBARY:  
 12 Q. Hey, Ben. Just a few questions for you.  
 13 A. Yeah.  
 14 Q. Did you vote in the 2022 primary and general  
 15 elections?  
 16 A. Yes.  
 17 Q. Do you intend to vote in future elections?  
 18 A. Yes.  
 19 Q. And let me back up.  
 20 So you currently live in the 15th District;  
 21 right?  
 22 A. Yes.  
 23 Q. And you intend to stay there, as far as you  
 24 know?  
 25 A. Yes.

Page 108

1 CERTIFICATE  
 2  
 3 STATE OF WASHINGTON  
 4 COUNTY OF PIERCE  
 5  
 6 I, Cindy M. Koch, a Certified Court Reporter in  
 7 and for the State of Washington, do hereby certify that  
 8 the foregoing transcript of the deposition of Benancio  
 9 Garcia III, having been duly sworn, on February 3, 2023,  
 10 is true and accurate to the best of my knowledge, skill  
 11 and ability.  
 12 Reading and signing was requested pursuant to  
 13 FRCP Rule 30(e).  
 14 IN WITNESS WHEREOF, I have hereunto set my hand  
 15 and seal this 6th day of February, 2023.  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

*Cindy M. Koch*  
 CINDY M. KOCH, CCR, RPR, CRR #2357

My commission expires:  
 JUNE 9, 2026



27 (Pages 105 to 108)



A				
<b>a.m</b> 5:2 41:18,18 70:5,5 101:5	50:13 <b>agreement</b> 23:14 53:9 62:11,12,24 64:13,16,19,25	72:17 81:22 83:10 95:18 97:17 98:21 101:20 104:19 105:21 107:5,13	93:3,6 103:25 <b>asking</b> 8:17,18 18:3 19:25 26:3 30:22 36:9 37:8 60:2 61:9 62:21 80:19 97:3 98:22,23	65:23 82:14 84:22 87:8 <b>awareness</b> 104:21 <b>awkward</b> 10:1
<b>ability</b> 108:11	<b>aharless@campa...</b>	<b>answered</b> 23:3		
<b>able</b> 12:19 13:4 30:1 37:17 48:17 63:6,12 70:7,9 73:15 74:20	2:16 <b>ahead</b> 7:5,11 13:12 17:15 25:5 31:5 31:13 37:18 38:19 38:21 42:14 47:15 56:23 61:20 66:6 67:21 79:10,12 80:24 81:4 88:6 88:23 95:10 98:10	<b>answering</b> 70:8 <b>answers</b> 7:23 8:18 107:4	<b>aspect</b> 76:21 <b>aspects</b> 74:24 79:25 <b>Assembly</b> 12:1 13:10 69:20 71:2 <b>assert</b> 99:9,11 <b>Assistant</b> 3:9 <b>associates</b> 59:6 <b>assume</b> 29:6 62:7 65:12 66:12	
<b>Absolutely</b> 60:18 75:8,13 80:21 92:6	<b>ain't</b> 86:18	<b>anticipate</b> 8:21 <b>anyway</b> 17:15 <b>Anyways</b> 93:1 <b>apologies</b> 58:21 <b>apologize</b> 10:2 20:18 27:25 28:7 34:19,20 37:6 41:3 47:6 51:1,12 52:21 55:22 57:19 57:24 58:20 63:4 65:11 68:22 95:2 95:17,20 96:7 102:10 107:18	<b>attached</b> 19:7 <b>attend</b> 18:21 98:17 <b>attention</b> 15:2 35:19 <b>attentiveness</b> 72:3 <b>attorney</b> 3:9 9:9 10:5,10 20:11 23:14 33:16,23 57:18 58:5,8,9 59:11 66:13 98:6	<b>back</b> 11:10 17:18 40:12 41:21 43:4 43:7 46:22 55:19 70:3,6,7,9 78:23 82:4 90:13 94:22 106:19 <b>Backer</b> 2:4 <b>background</b> 71:19 <b>banged</b> 92:25 <b>bank</b> 75:19,24,25 78:13 79:19 80:23 81:3 <b>banking</b> 89:20 <b>barely</b> 86:22 <b>base</b> 82:22 83:17 <b>based</b> 15:5,6 22:7 22:11 32:23 33:6 35:12 89:7 <b>basically</b> 22:25 46:4 56:9 58:16 87:7,9 89:10,11 91:25 94:3 <b>basis</b> 22:9 <b>battery</b> 102:11 <b>behalf</b> 100:18 <b>bel-</b> 6:3 <b>belief</b> 69:23 71:5 <b>beliefs</b> 42:19 43:11 45:4 83:25 <b>believe</b> 11:20,22,24 12:1 13:1,15 14:3 15:5 32:9,23 33:7 33:15 39:25 40:18 40:22,25 41:23 43:14 44:22,24 45:5,6 47:17,23 51:6 55:4 58:7,8 58:17 59:5 71:21 77:23,24 83:2,15 84:3,4 87:13,15
<b>acceptable</b> 78:15 80:1 90:2	<b>al</b> 1:12,17 <b>Alex</b> 39:21 45:21 48:18 60:6 <b>align</b> 83:11 <b>alleged</b> 75:9 <b>allow</b> 24:3 50:5 <b>allowed</b> 46:17 47:10 <b>ambiguous</b> 81:23 <b>Amendment</b> 50:5 <b>American</b> 2:18 11:23 13:17,21 14:4 42:6,12 87:15 <b>AmeriCorps</b> 12:24 71:17 <b>and/or</b> 48:22 <b>Andrew</b> 2:3 3:8 5:11 47:2 49:13 <b>andrew.hughes...</b> 3:12 <b>Angeles</b> 2:20 3:4 <b>angry</b> 87:10,11 <b>ANNABELLE</b> 2:14 <b>answer</b> 8:24 9:12 9:12 14:12 15:21 17:9,11,15 22:19 46:21 62:24 65:5 66:6 70:9,13	<b>answered</b> 23:3 <b>answering</b> 70:8 <b>answers</b> 7:23 8:18 107:4 <b>anticipate</b> 8:21 <b>anyway</b> 17:15 <b>Anyways</b> 93:1 <b>apologies</b> 58:21 <b>apologize</b> 10:2 20:18 27:25 28:7 34:19,20 37:6 41:3 47:6 51:1,12 52:21 55:22 57:19 57:24 58:20 63:4 65:11 68:22 95:2 95:17,20 96:7 102:10 107:18 <b>Apparently</b> 95:23 <b>appeared</b> 1:23 <b>apply</b> 24:14 <b>appreciate</b> 82:13 <b>approval</b> 75:22 76:5 <b>approved</b> 57:12,12 <b>approximately</b> 12:19 27:23 69:9 70:16 <b>April</b> 11:6 37:12 <b>area</b> 12:18 15:14 40:8 67:6,7 73:2 73:12 74:23 77:8 87:25 95:11 101:13 <b>article</b> 75:2,5 87:8 <b>articles</b> 45:18 74:16 <b>ASEEM</b> 2:9 <b>Asian</b> 82:23 <b>aside</b> 36:4,9 83:23 94:12 <b>asked</b> 45:20 51:10 54:21 55:21 83:9	<b>aspect</b> 76:21 <b>aspects</b> 74:24 79:25 <b>Assembly</b> 12:1 13:10 69:20 71:2 <b>assert</b> 99:9,11 <b>Assistant</b> 3:9 <b>associates</b> 59:6 <b>assume</b> 29:6 62:7 65:12 66:12 <b>attached</b> 19:7 <b>attend</b> 18:21 98:17 <b>attention</b> 15:2 35:19 <b>attentiveness</b> 72:3 <b>attorney</b> 3:9 9:9 10:5,10 20:11 23:14 33:16,23 57:18 58:5,8,9 59:11 66:13 98:6 <b>attorney-client</b> 17:13 46:20,25 64:24 96:21 98:20 <b>attorneys</b> 57:14,25 58:3 59:9,13,21 61:8 97:4,6 104:16 <b>Augustine</b> 38:12 <b>authorization</b> 50:16 62:1 <b>auto</b> 7:3,4 <b>available</b> 85:9 <b>Avenue</b> 3:10 5:19 6:7 51:16 <b>average</b> 72:8 <b>aware</b> 37:13,15 45:10,24 46:2,7 52:2,10 53:14,22 59:24 60:1,4,19 61:2 64:3,7 65:18	<b>back</b> 11:10 17:18 40:12 41:21 43:4 43:7 46:22 55:19 70:3,6,7,9 78:23 82:4 90:13 94:22 106:19 <b>Backer</b> 2:4 <b>background</b> 71:19 <b>banged</b> 92:25 <b>bank</b> 75:19,24,25 78:13 79:19 80:23 81:3 <b>banking</b> 89:20 <b>barely</b> 86:22 <b>base</b> 82:22 83:17 <b>based</b> 15:5,6 22:7 22:11 32:23 33:6 35:12 89:7 <b>basically</b> 22:25 46:4 56:9 58:16 87:7,9 89:10,11 91:25 94:3 <b>basis</b> 22:9 <b>battery</b> 102:11 <b>behalf</b> 100:18 <b>bel-</b> 6:3 <b>belief</b> 69:23 71:5 <b>beliefs</b> 42:19 43:11 45:4 83:25 <b>believe</b> 11:20,22,24 12:1 13:1,15 14:3 15:5 32:9,23 33:7 33:15 39:25 40:18 40:22,25 41:23 43:14 44:22,24 45:5,6 47:17,23 51:6 55:4 58:7,8 58:17 59:5 71:21 77:23,24 83:2,15 84:3,4 87:13,15

87:16 88:17 90:10 104:7,8 <b>bell</b> 59:1 <b>Bellevue</b> 15:14 40:1 <b>Ben</b> 2:10 46:21 62:22 65:6 76:18 78:7 96:22 98:21 106:12 <b>Benancio</b> 1:4,20 4:1 5:4,15 35:5 76:13 108:8 <b>Benton</b> 36:16 91:22 92:1 <b>best</b> 47:23 67:21 68:2 74:3 84:10 84:15 99:12 107:5 107:5 108:10 <b>better</b> 69:18 70:25 73:3 <b>Bifurcate</b> 48:21 <b>big</b> 90:9,11 91:8,8 <b>bill</b> 105:23 <b>binder</b> 23:2,3 <b>Birch</b> 5:19 6:7 51:16 <b>bit</b> 6:8 9:19 14:5 16:18 21:5 45:9 59:12 65:16 66:8 67:4,5,24 75:14 83:9 84:5 92:12 93:18 95:2,4,7 101:10 <b>blue</b> 15:16 <b>board</b> 31:18 72:25 74:7 103:5 <b>boards</b> 32:6 <b>body</b> 83:4 <b>bodywork</b> 6:24 7:3 7:4 <b>books</b> 55:13 <b>border</b> 91:24 <b>born</b> 12:17 <b>bottom</b> 81:24 <b>boundaries</b> 24:1 41:24	<b>boundary</b> 22:23 23:17 <b>bounds</b> 97:12 <b>box</b> 55:19 <b>boxed</b> 93:7 100:7 100:11 <b>Brady</b> 37:14 <b>brand-new</b> 58:22 <b>break</b> 8:22,25 41:15,16 100:14 100:24 <b>brief</b> 27:12,12,15 28:5 55:11,11 <b>briefly</b> 5:11 <b>bring</b> 35:24 36:25 46:17 47:10 <b>bringing</b> 25:9 32:20 33:13 34:25 35:1,23 <b>brochure</b> 16:19,20 <b>broken</b> 83:6 <b>brother</b> 41:10 <b>brothers</b> 41:3,11 <b>brought</b> 19:24 32:21 47:16 59:18 60:4 65:3 78:11 95:22 <b>Building</b> 3:4 <b>burn</b> 6:8 <b>burned</b> 6:6 <b>business</b> 6:23 <b>busy</b> 30:14 55:15 84:7 85:2 <b>button</b> 62:20 66:3 <b>buy</b> 86:21 <hr/> <b>C</b> <hr/> <b>C</b> 2:1 3:1 108:1,1 <b>CA</b> 2:20 3:4 <b>Caleb</b> 76:3 <b>call</b> 14:24 16:22 27:17,18,19 28:9 29:4 34:22 35:14 52:16,18 54:14,21 55:3,19,24 76:17 89:12 98:8,11	<b>called</b> 15:8,16 16:2 30:9,23 34:22 35:13,14 55:15 56:1 <b>calling</b> 44:6 55:6 <b>calls</b> 22:17 23:22 27:25 29:7 33:25 46:20 64:23 72:6 72:15 76:10 81:7 89:10,23 96:21 98:20 <b>campaign</b> 2:10,14 44:1 67:6 68:3,20 78:20 <b>campaigning</b> 35:25 37:6 44:3 73:17 <b>Campos</b> 40:17,18 40:19,22,25 41:8 41:10 45:21 46:16 47:10 60:7 63:23 <b>Canadian</b> 91:24 <b>candidate</b> 35:25 36:18 67:6,15,21 67:24 69:1 72:2 73:14 74:21 76:14 78:7 82:23 83:14 85:9 90:4 <b>candidates</b> 68:6,8 68:14 73:16 79:21 80:8,16 82:15 84:8 101:12,16 <b>capacity</b> 1:8,16 <b>car</b> 82:11 93:1 94:8 100:16 <b>care</b> 74:8 79:12 <b>career</b> 83:6 <b>case</b> 2:2,2,8 3:2,7 7:14 20:19 25:8 25:10 26:5 42:13 45:10,16 46:18 49:15,21 50:6,25 56:4 57:15 58:1 60:5,7,8 61:9,18 66:23 73:2 74:13 78:16 97:7 100:19	103:6 105:8,17 106:1 <b>cases</b> 19:22 <b>caught</b> 15:2 81:24 <b>CCR</b> 1:25 108:20 <b>cell</b> 48:7 50:11 58:21 <b>Center</b> 2:10,14,23 <b>central</b> 72:12 91:25 91:25 <b>certain</b> 6:25 <b>certainly</b> 32:11 37:20 53:8 79:24 99:22 <b>Certified</b> 108:6 <b>certify</b> 108:7 <b>chairman</b> 76:3 79:14 <b>chairmen</b> 36:25 79:15 <b>chairpersons</b> 79:15 <b>challenge</b> 103:4 <b>challenges</b> 29:24 78:21 88:8,9 <b>challenging</b> 34:14 65:24 <b>Chalmers</b> 2:4 <b>Chan</b> 82:19 <b>change</b> 25:6,9 31:7 42:23 43:1 77:23 81:21 <b>changed</b> 25:25 26:2 26:3,7,12 61:5,10 61:11 71:21 76:1 82:3 102:1,3 <b>changes</b> 41:1 <b>changing</b> 25:20,23 <b>chapter</b> 42:7 <b>charged</b> 103:18 <b>cheat</b> 87:13 <b>Chicago</b> 2:16 <b>choose</b> 11:18 13:24 84:1 <b>Cindy</b> 1:25 70:7,8 108:6,20	<b>circumstance</b> 82:10 89:3 <b>circumstances</b> 100:22 107:19 <b>Citizens</b> 13:21 42:6 <b>city</b> 24:3 <b>civics</b> 29:11,12,22 30:11 55:14 <b>civil</b> 34:1 42:11,11 56:6 77:24 <b>claim</b> 30:12 <b>claims</b> 46:17 47:11 <b>clarify</b> 8:14 51:13 56:12 91:14 <b>class</b> 72:9,20 <b>clear</b> 16:1 17:12 20:6 36:17 50:4 60:13 66:14 74:2 80:13 <b>clearly</b> 28:19 81:22 <b>client</b> 99:3 <b>clients</b> 62:4 <b>closer</b> 95:8 <b>clothing</b> 100:11 <b>Coalition</b> 31:19 <b>coffee</b> 99:22 <b>cognitive</b> 9:7 <b>colleagues</b> 85:22 <b>collect</b> 93:21 <b>college</b> 11:25 69:19 71:1 77:25 <b>Columbia</b> 92:1 <b>combat</b> 11:22 42:21 <b>come</b> 55:9 58:6 <b>comes</b> 74:19 <b>coming</b> 40:12 99:18 103:15,22 <b>comments</b> 17:4,21 17:24,24,25 18:11 <b>commission</b> 17:5 17:22 18:4,10,22 18:24 21:3 37:19 57:11 108:22 <b>commissioner</b> 52:4
--	--	---	--	--

52:5,6 <b>commissioners</b> 26:19,21 37:9,16 <b>committed</b> 78:22 <b>committee</b> 53:8 <b>common</b> 14:21 73:10,11 <b>communicate</b> 81:9 <b>communication</b> 17:13 46:20 54:5 64:6,24 98:20 99:2 <b>communications</b> 62:22 81:18 93:13 96:21 <b>communities</b> 73:9 <b>community</b> 13:3 23:25 24:9 40:13 71:24 72:4 84:22 102:18 <b>complaint</b> 10:11 18:7,19 19:2,4,9 19:12,15,21 20:1 20:4,16,16,17,19 20:22,23 21:4,10 21:12,17 23:5,9 23:13 25:10 26:9 26:11,15 33:9 57:2,5,6,9 61:16 61:20 62:16 66:12 83:17 94:11,15 97:24 104:2 <b>Complaints</b> 19:23 <b>complete</b> 53:9 89:15 <b>completely</b> 6:7 21:7 79:11 <b>completion</b> 48:2 61:22 <b>Complex</b> 3:10 <b>computer</b> 51:4 93:24 <b>concept</b> 57:12 <b>concerned</b> 31:20 32:9,15,16 33:1,3	34:1 35:20 55:4 67:2 81:16,17,18 103:2 <b>concerns</b> 31:11 81:11 95:15 <b>concluded</b> 107:21 <b>conclusion</b> 22:17 23:22 72:6 <b>conducted</b> 68:24 <b>conflict</b> 62:14 96:16,18 97:1,5 97:11,13,16 <b>conflicting</b> 61:16 <b>confused</b> 10:6 20:15 <b>confusion</b> 17:11 <b>congress</b> 11:8,14,18 18:1 24:2 28:2 31:8 34:14 47:23 56:8 67:8 71:14 91:9 <b>congressional</b> 11:12,13 12:7,16 67:22 69:10 70:17 74:4 76:14 77:3 77:10 78:6 82:20 85:4 86:1 91:15 92:14 93:15 102:4 <b>connect</b> 30:20 34:21 <b>connected</b> 78:10 <b>conservative</b> 84:13 84:14 <b>consideration</b> 33:13 34:25 <b>considering</b> 32:19 35:1 <b>constitution</b> 11:21 45:5 73:25 87:19 <b>construction</b> 86:25 <b>contact</b> 33:18 52:14 55:24 57:17 <b>contacted</b> 27:1 30:10,13 31:5 52:14	<b>contacting</b> 52:12 <b>content</b> 54:18 <b>continue</b> 101:24 <b>Continuing</b> 3:1 41:19 71:9 101:6 <b>controversy</b> 75:3 85:17 <b>conversation</b> 16:6 27:14,14,16,20 28:5,6 51:24 52:1 52:23 55:7,9,13 56:12 61:3 94:4 <b>conversations</b> 29:13,15,18 30:18 96:22 97:4 <b>cookie</b> 81:25 <b>coordinated</b> 77:7 <b>copy</b> 20:1,4 63:6,11 63:12 64:10,15 88:14 <b>core</b> 45:4 <b>correct</b> 11:14,15 16:13 29:3 30:9 30:24,25 31:2 43:19 45:11 46:9 46:10 49:14,16 57:10 59:8 60:9 60:11,18 61:6 62:5,6,9,10 66:18 67:9 68:5,11 75:8 75:8,13 79:7 97:25 <b>correctly</b> 53:2 82:8 <b>cost</b> 29:25,25 62:15 <b>counsel</b> 9:18 50:3 59:25 60:11 61:25 62:8,13 63:12 66:21,24 88:24 103:22 104:13 <b>counsel's</b> 89:1 <b>counterparts</b> 72:14 <b>counties</b> 22:22 25:17 26:8 <b>country</b> 13:3 42:9 42:21 71:23 83:2	87:17 <b>County</b> 5:20,23 26:6 31:19 36:16 74:13 82:19,21 91:19,22,23 92:7 94:16,17 95:5,12 101:13 108:4 <b>County's</b> 85:7 <b>couple</b> 51:14 87:7 101:8 104:25 105:2 106:8 <b>course</b> 6:15 63:14 65:9 97:20 106:9 <b>court</b> 1:1 7:23 8:2 43:4,16 50:5 56:14 60:2,11 70:11 107:12 108:6 <b>courts</b> 43:13,18 53:13 <b>covers</b> 91:19 <b>COVID</b> 102:1 103:4 <b>COVID's</b> 102:23 <b>created</b> 75:21 81:3 87:17 89:21 <b>critical</b> 14:4 25:7 <b>criticizing</b> 75:6 <b>cross</b> 22:21 <b>Crossclaim</b> 48:23 50:6 <b>CRR</b> 1:25 108:20 <b>Culp</b> 77:4 <b>Culp's</b> 80:17 <b>cultural</b> 14:19 <b>culture</b> 12:18 14:8 14:17 <b>current</b> 18:10 41:24 82:10 <b>currently</b> 36:1 51:15 106:20 <b>cut</b> 66:8 70:7 <hr/> <b>D</b> <hr/> <b>Dallin</b> 59:1 64:1 <b>damage</b> 6:8 51:19	<b>damaged</b> 100:12 <b>Dan</b> 68:4 77:2 <b>date</b> 1:24 100:1 <b>day</b> 58:17 108:15 <b>DC</b> 2:12 <b>de-</b> 6:22 <b>deadline</b> 37:17 53:11 <b>deal</b> 7:1 <b>dealing</b> 56:8 100:21 <b>decide</b> 43:4 67:13 <b>decided</b> 33:20 71:13 82:3 85:13 <b>decision</b> 24:2 43:12 46:23 78:17,19 99:18,24 <b>defend</b> 36:20 <b>defendants</b> 1:10,18 2:2 3:7 45:25 48:18 49:18,21 59:15,22,25 60:6 60:19 61:19 <b>Defendants'</b> 48:20 <b>defended</b> 42:12 <b>defending</b> 45:6 <b>Defense</b> 2:18 <b>definitely</b> 82:13 <b>definition</b> 97:10 <b>delayed</b> 76:7,8 <b>Democrat</b> 80:24 <b>Democrats</b> 15:13 40:3 <b>demographic</b> 73:12 <b>dep</b> 20:12 <b>deposed</b> 6:18,22 <b>deposition</b> 1:19 4:1 7:13 9:16,17 10:4 10:9 19:22 20:5,6 20:12 46:5 51:11 54:2,13 60:17 63:7 64:11,18 65:4,10 86:15 98:18 107:21 108:8 <b>depositions</b> 60:21
--	---	---	--	---

<b>descent</b> 68:13	6:13 11:12,13	90:9	<b>Ellensburg</b> 80:6,6	<b>exactly</b> 7:6 33:22
<b>describe</b> 26:12	12:7,8,9,12,13,16	<b>Drew</b> 10:10 34:24	<b>else's</b> 20:17	34:7 35:18 80:10
<b>description</b> 25:11	21:19 22:8 23:16	35:16 46:23 57:16	<b>email</b> 18:12 81:10	80:16
<b>designated</b> 83:15	23:19 26:2,6,7	58:7 59:11 97:1	89:18 93:12,14,18	<b>EXAMINATION</b>
<b>desire</b> 60:21 69:21	31:8,16 36:15	<b>Drew's</b> 34:3,8	104:8	1:19 4:2,3
71:3	37:19 47:24 52:9	<b>drive</b> 99:25	<b>emails</b> 81:12 85:16	<b>examined</b> 5:6
<b>desires</b> 13:2 62:14	53:1,6 67:22 69:6	<b>dstokesbary@ch...</b>	85:16 104:5	<b>example</b> 33:9 54:3
<b>detail</b> 36:19	69:10,25 70:14,17	2:6	<b>endangered</b> 24:13	69:13 70:20 87:23
<b>details</b> 16:18	71:7 72:23 74:4,4	<b>due</b> 42:2,20	<b>ended</b> 7:2 33:22	<b>exchanged</b> 90:14
<b>determine</b> 42:17	75:1,23 76:14	<b>Dufault</b> 31:24,25	<b>endorsed</b> 85:24	<b>exclusively</b> 62:9
43:10,20 83:19	78:6 79:14 80:7	31:25 32:4,5,17	<b>endorsement</b> 34:15	<b>exhausted</b> 87:2
99:9	81:3 82:20 83:15	45:3	<b>ends</b> 28:3 84:15	<b>EXHIBIT</b> 4:9
<b>determined</b> 26:22	83:23 85:4 87:21	<b>duly</b> 5:5 108:9	<b>enforcement</b> 40:21	<b>exhibits</b> 4:10,11
<b>determining</b> 21:7	89:21 91:15 92:5	<b>Dupree</b> 31:8,23	41:5	<b>exist</b> 97:9
<b>difference</b> 12:19	92:10,13,13 94:13	<b>duration</b> 62:15	<b>engagement</b> 62:24	<b>existence</b> 97:15
13:3 40:12 71:22	95:14 106:20	<b>duty</b> 10:20	64:11,25	<b>expect</b> 81:25 82:9
71:25	107:1,2		<b>English</b> 75:22	<b>expectation</b> 62:7
<b>different</b> 19:25	<b>districted</b> 32:17	<b>E</b>	<b>enjoyed</b> 68:23	<b>expected</b> 9:25
22:22 25:18 33:5	<b>districts</b> 25:4 71:18	<b>E</b> 2:1,1 3:1,1 5:8	<b>enjoying</b> 11:7	<b>expecting</b> 52:15,17
61:21 91:2 102:6	72:24	41:19 50:21 71:9	<b>entertain</b> 79:24	<b>experience</b> 24:6,8
<b>difficult</b> 94:7	<b>Division</b> 3:10	101:6 105:3,3	<b>entity</b> 103:9,10	24:15 67:5 71:14
<b>difficulty</b> 48:8	<b>document</b> 48:4,8,9	106:10 108:1,1	<b>environmental</b>	72:11,18 87:22
<b>diligence</b> 42:20	48:14,25 49:1,3,6	<b>earlier</b> 14:5,15	24:12	101:11
<b>dinner</b> 39:8	49:7,25 87:17	45:20 96:11	<b>Ephrata</b> 40:8	<b>experiences</b> 14:8,17
<b>dis-</b> 39:14	<b>documents</b> 10:8	<b>early</b> 27:21	<b>ERICA</b> 3:9	14:19
<b>disagree</b> 78:3	86:15,17 87:6	<b>Ebony</b> 11:24 69:18	<b>erica.franklin@a...</b>	<b>expert</b> 105:7,13,17
<b>disconnect</b> 71:20	88:21 89:7 92:17	70:25 77:25	3:13	<b>expires</b> 108:22
<b>disconnection</b>	92:24 93:4 100:5	<b>economically</b> 72:19	<b>ERNEST</b> 2:17	<b>explain</b> 75:14 95:3
69:17 70:24	<b>dog</b> 90:4	<b>Eddie@MorfinL...</b>	<b>especially</b> 78:9	<b>explicable</b> 25:15
<b>discuss</b> 27:7 47:3	<b>doing</b> 9:20 18:4,24	2:24	<b>Espinoza</b> 16:12,14	<b>expressing</b> 52:25
52:12 64:25 85:22	19:1,21 20:5 34:6	<b>edge</b> 71:11	16:22 29:2,8,19	<b>expression</b> 83:11
96:22 103:23	74:3 90:1	<b>Educational</b> 2:18	30:9,23 34:22	<b>extent</b> 22:17 23:21
<b>discussed</b> 27:5	<b>dots</b> 30:20 34:21	<b>EDUARDO</b> 2:22	35:13 54:21 55:2	46:20 62:21 64:23
29:16 39:1 40:14	<b>doubt</b> 90:12	<b>effect</b> 43:8,9 102:23	<b>et</b> 1:12,17	72:5 96:20 98:19
41:7	<b>Dr</b> 105:5,13	<b>effort</b> 77:7 87:22	<b>evening</b> 88:17	<b>extraordinarily</b>
<b>discussion</b> 27:11	<b>Draft</b> 20:1	101:15	<b>event</b> 15:12,13	77:19
45:22 52:7 82:24	<b>drafting</b> 18:10	<b>eherrera@malde...</b>	39:25 40:2 75:15	<b>eyes</b> 96:9
<b>disheartened</b> 91:4	<b>drastic</b> 25:9	2:21	84:7 102:21	
<b>dismiss</b> 46:15,24	<b>drastically</b> 25:20	<b>either</b> 37:25	<b>events</b> 30:5	<b>F</b>
47:9 48:22 61:25	25:23 26:2,3,7,11	<b>elected</b> 102:5	<b>everybody</b> 73:21	<b>F</b> 105:3 108:1
<b>dismissed</b> 50:4	<b>drawing</b> 52:9 53:5	<b>election</b> 21:9 31:14	74:5	<b>face</b> 34:17 37:22
<b>displeased</b> 87:12	53:8	33:1 77:4 81:7	<b>Everything's</b> 65:17	<b>faced</b> 82:15
<b>distinguishing</b> 95:1	<b>drawn</b> 22:15,24	<b>elections</b> 25:25	<b>evidence</b> 53:18	<b>facilities</b> 23:25
96:4	52:12	106:15,17 107:2	66:4 89:16	24:10
<b>district</b> 1:1,2 6:11	<b>dream</b> 11:23 87:15	<b>electoral</b> 87:24	<b>exact</b> 33:11	<b>fact</b> 15:1 31:11
		<b>electronic</b> 93:13		42:2 44:24 45:2,4



47:16 53:5 54:9 77:14,16 79:24 84:23 85:14 87:12 89:10 <b>facts</b> 80:13 <b>Fain</b> 26:23 <b>fair</b> 10:7,12 12:2,4 12:6,10,13 23:10 25:25 32:16 37:7 73:24 78:5 87:13 99:16 <b>fairly</b> 69:6 70:13 <b>falls</b> 97:16 <b>familiar</b> 38:3,3 42:7 <b>familiarity</b> 24:5 67:7 <b>familiarized</b> 24:11 <b>families</b> 12:22 <b>family</b> 40:18 41:4 87:2 99:19 100:10 <b>fantastic</b> 13:5 <b>far</b> 36:14 70:9 87:6 102:13 106:23 <b>favor</b> 65:24 66:17 <b>favorable</b> 81:8 <b>favor</b> 77:2 <b>fearful</b> 103:2 <b>February</b> 1:24 5:1 27:23 108:9,15 <b>federal</b> 10:25 11:1 11:4,9,14 12:21 23:24 24:1,9,13 71:16 83:5 <b>feel</b> 8:22 10:1 12:14 36:20 42:13,15 43:1 60:12 66:1 71:20 78:1,3 <b>feeling</b> 102:2 <b>feelings</b> 42:9 <b>feet</b> 68:2 <b>fellow</b> 67:15 <b>felt</b> 7:1 42:9 67:16 67:20 <b>fields</b> 40:10	<b>Fifth</b> 3:10 <b>fight</b> 80:2 83:8 90:4 <b>fighter</b> 80:2 90:11 <b>fighting</b> 36:1 90:9 <b>file</b> 54:15,17 <b>filed</b> 18:7,19 19:6,6 20:2 21:12,16 57:2,5 61:17,17 61:21 66:12 97:21 97:24 99:12 104:2 <b>filing</b> 97:23 98:4 <b>final</b> 21:3,4,11,13 21:14,16,21 22:1 22:2 <b>finalize</b> 37:18 <b>finally</b> 76:6 <b>find</b> 62:20 68:21 71:12 78:16 93:8 102:18 107:19 <b>findings</b> 43:19 <b>finds</b> 43:16 <b>fine</b> 41:17 44:10,16 84:8 <b>finish</b> 50:14 60:14 <b>fire</b> 5:24 6:8,16 33:24 51:17,19 53:16,23 87:4 89:3 <b>firm</b> 2:22 58:14 64:1 <b>first</b> 5:5 20:22 21:2 21:10,22,25 28:8 29:4 30:7,23 33:20 39:24 55:23 59:21 60:17,24 61:7 66:14,18,21 67:10 75:16 87:18 88:15 96:12 <b>fit</b> 25:10 <b>five</b> 5:24 39:9 54:20 56:8 68:9 75:16 79:18 87:1 93:7 100:7 104:10 <b>five-minute</b> 55:7 100:14,24	<b>fix</b> 83:1,2 <b>fixed</b> 87:5 <b>flat-out</b> 28:15,17 <b>flipping</b> 23:3 <b>Floor</b> 2:19 <b>focused</b> 85:1 <b>folks</b> 71:15 81:15 <b>follow</b> 16:24 <b>followed</b> 71:12 <b>following</b> 45:5 <b>follows</b> 5:7 <b>foolish</b> 10:18 <b>Force</b> 90:15 <b>foregoing</b> 108:8 <b>forgetting</b> 16:11 <b>form</b> 14:9 15:19 17:6,8 18:17 54:23 88:3 95:16 101:17,18 103:17 104:17 107:11 <b>former</b> 41:5 <b>forward</b> 60:5,7 61:18 105:17 <b>fought</b> 13:17 <b>found</b> 34:4 76:16 78:20 82:1 85:24 90:25 <b>founded</b> 13:13,22 <b>Fourth</b> 50:5 <b>framers</b> 87:16 <b>Franklin</b> 3:9 92:2 94:17 <b>FRCP</b> 107:23 108:13 <b>free</b> 8:23 13:18 62:15 73:5 <b>freedoms</b> 43:15 <b>freestyling</b> 97:15 <b>freeway</b> 22:22 23:17 <b>freeze</b> 35:2 <b>frequently</b> 97:21 <b>Friday</b> 98:2 <b>friend</b> 15:3,24 102:5	<b>friends</b> 85:22 <b>front</b> 23:4 57:21 99:21,22 <b>froze</b> 35:11 <b>frozen</b> 35:2,4 70:2 <b>fruition</b> 61:22 <b>full</b> 9:3 <b>fully</b> 34:21 <b>function</b> 9:7 <b>Fund</b> 2:18 <b>funding</b> 103:22 <b>funds</b> 76:22,23 <b>further</b> 94:17 104:24 107:17 <b>future</b> 106:17 107:2 <b>fuzzy</b> 57:20 65:17 94:18 96:4,6 <hr/> <b>G</b> <hr/> <b>Gaber</b> 2:9 4:5 50:20,22,24 53:21 54:7 55:1 63:1,5,8 63:11,16 65:1,8 66:5 70:2,6 71:10 72:10 73:1 88:5 95:24 97:2,17,19 98:22 99:4 100:13 101:7,19 103:19 104:18,24 107:11 107:17 <b>Garcia</b> 1:4,20 4:1 5:4,10,15 6:18 9:2 9:15 10:13,19 11:19 14:22 15:21 17:9,21 19:9 20:7 20:20 23:2 26:1 26:18 30:19 31:23 32:13 35:10 37:8 41:21 43:6,23 47:8 48:15 50:4 50:23 62:22 64:10 64:24 65:2,18 70:8 71:12 76:14 87:9 88:6 97:3 99:5 101:9 105:5	107:18 108:9 <b>Garden</b> 39:9 <b>gather</b> 65:23 67:1 72:2 96:15 <b>gathered</b> 83:10 <b>gears</b> 45:9 67:4 <b>general</b> 3:9 36:18 76:13 80:19 106:14 <b>generality</b> 36:20 <b>generally</b> 57:1 <b>geographic</b> 94:15 95:15 <b>geographical</b> 25:14 <b>ger-</b> 42:19 <b>gerry-</b> 42:2 <b>gerrymander</b> 52:13 53:1 54:10 94:13 <b>gerrymandered</b> 22:14 23:19 44:25 <b>gerrymandering</b> 15:6 22:7,11,12 24:7,16 25:21 27:9 28:10 29:20 30:8,12 32:23 33:6 35:21 42:3 42:20 43:12 44:23 46:17 47:10,17 <b>getting</b> 14:2 16:21 29:22 33:23 79:20 93:15 94:1 101:12 102:15 <b>give</b> 9:3 18:1 22:20 33:17 55:18 80:22 81:4 83:5 99:25 100:1 102:7 <b>given</b> 27:4 28:24 52:19 58:8 66:20 81:19 89:3 91:1 <b>gives</b> 37:21 <b>glad</b> 87:1 <b>glasses</b> 48:8 57:20 57:21 58:22 65:11 65:15 94:19 95:21 95:21
---	---	--	---	---



<p><b>go</b> 7:5,11,11,20,21 8:18 13:11 17:15 25:5 26:23 31:13 35:6 37:18 38:19 38:21 42:14 43:18 43:19 47:15 53:9 56:23 61:20 66:6 67:21 68:1 69:14 70:4,21 79:10,12 80:21,24 81:4 83:19 86:21 88:6 95:10 98:10 102:10 <b>goal</b> 42:16,17 43:6 43:10,14 81:6 <b>God</b> 77:21 <b>goes</b> 40:22,25 43:3 97:11 <b>going</b> 21:7,19 24:24 25:5,17 31:13 35:20 46:5,19,22 47:13,21 48:4 55:13 56:7 60:14 62:20,23,23 64:22 68:1 85:13 86:25 93:6,17 94:9,21 96:20 98:20 99:1 99:12,20 100:5,8 100:20 102:10 <b>good</b> 5:10 14:2 32:10,12 41:14 63:5 66:7,9,10 82:22 84:15 <b>goodness</b> 6:3 21:23 99:21 <b>Gordon</b> 64:8 <b>gosh</b> 6:1,9 15:10 80:7 <b>gotten</b> 42:6 69:18 70:25 <b>governing</b> 24:22 <b>government</b> 10:25 11:2,5,9 12:21 23:24 24:1,9 71:16</p>	<p><b>Governor</b> 42:11 <b>Grandview</b> 5:19 6:4 51:16 <b>Granger</b> 12:25 13:23 38:25 39:15 <b>Grant</b> 91:23 92:2 <b>Graves</b> 26:25 27:3 27:4,5 28:10,25 31:1,4 32:3 33:10 33:13,17 34:22,23 35:14,14 51:25 52:8 53:14,22 54:1,8 55:3,6 56:13 <b>Graves'</b> 52:3 53:18 53:25 <b>greatest</b> 87:17,17 <b>greatly</b> 76:7 77:4 103:1 <b>grew</b> 12:17 38:22 <b>GRH</b> 71:17 <b>growing</b> 24:5 <b>guess</b> 6:5 19:25 21:15 70:6 90:9 97:15 <b>guest</b> 40:4 <b>guidelines</b> 7:20 <b>guy</b> 90:9</p> <hr/> <p style="text-align: center;"><b>H</b></p> <hr/> <p><b>H</b> 105:3 <b>half</b> 95:5 100:8 <b>halfway</b> 37:10 <b>hand</b> 29:10 81:24 84:6 108:14 <b>hands</b> 40:7 79:23 <b>hang</b> 49:11 <b>happen</b> 43:17 63:18 83:21 <b>happened</b> 30:23 31:4 35:13 79:6 79:16 80:4,20 82:20 107:9 <b>happening</b> 16:25 31:16,20 33:2 56:10 82:12</p>	<p><b>hard</b> 26:12 33:7 51:10 90:6,7 <b>HARLESS</b> 2:14 <b>harmed</b> 41:23 42:3 <b>head</b> 8:1 88:7 <b>health</b> 103:2 <b>hear</b> 6:9 18:3 40:9 41:13 53:19 80:3 107:12 <b>heard</b> 26:1 34:13 34:15 36:3 40:4 66:19 78:3 104:12 <b>heart</b> 13:2 <b>heavily</b> 53:5,7 <b>Hello</b> 62:25 <b>help</b> 13:14 75:19,25 <b>helped</b> 53:23 67:15 <b>helping</b> 102:5 <b>Herald</b> 15:3,15 21:6 24:25 25:2 74:16 <b>Herald's</b> 37:16 <b>hereunto</b> 108:14 <b>HERRERA</b> 2:17 <b>hey</b> 62:19 80:24 101:23 106:12 <b>high</b> 12:25 72:21 <b>highlight</b> 50:8 <b>highlighting</b> 50:3 <b>highway</b> 25:19 26:5 <b>hire</b> 76:23 <b>hired</b> 76:25 <b>Hispanic</b> 12:1 13:7 13:9 22:25 42:8 69:20 71:2 <b>history</b> 11:24 14:2 79:20 84:12 <b>hitting</b> 25:19 <b>Hobbs</b> 1:7,16 10:11 19:24 20:7,20 45:10,16 47:11 <b>Hold</b> 96:19,19 <b>holder</b> 99:6 <b>holds</b> 102:9 <b>Holt</b> 59:1 64:2</p>	<p><b>Holtzman</b> 58:14 64:1 <b>holy</b> 87:18 <b>home</b> 23:24 40:12 51:3,17 79:11 86:23 87:1 <b>homeowner</b> 12:23 <b>homeowners</b> 12:20 71:16 <b>honest</b> 34:2,7 37:4 57:16 60:13 82:2 84:25 90:8 92:23 <b>honestly</b> 99:19 <b>honesty</b> 82:4 <b>Honeyford</b> 39:25 84:21 85:12,13 <b>honor</b> 7:1 44:6 <b>hope</b> 51:5 68:21 93:23 <b>hopefully</b> 7:21 43:3 90:4 100:25 102:9 <b>hoping</b> 55:18,19 <b>host</b> 93:22 <b>hours</b> 12:24 78:22 <b>house</b> 5:24 6:6,16 33:24 69:12,14 70:19,21 86:19 87:3 88:20 89:4 93:25 <b>households</b> 12:20 <b>Hughes</b> 3:8 4:4,6 5:9,11 14:11 15:20 17:7,17 18:20 22:18 24:18 35:6,9 41:14,20 46:22 47:5,7 50:18 51:10 53:17 53:24 59:12 61:4 83:9 96:13,25 97:11 101:1,17 104:25 105:2,4,12 105:20 106:5,9 <b>Hughes'</b> 59:20</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/> <p><b>idea</b> 67:23</p>	<p><b>ideal</b> 100:21 <b>identification</b> 4:10 4:11 <b>identified</b> 84:18 <b>ideology</b> 84:23 <b>III</b> 1:4,20 4:1 5:4 5:15 108:9 <b>IL</b> 2:16 <b>illegal</b> 15:6 22:11 24:7 35:20 42:2 42:19 44:22 <b>illegally</b> 43:12 44:24 83:15 <b>imagine</b> 28:4 <b>impact</b> 78:25 <b>important</b> 13:17 14:6,15,18,20 25:6 47:20,22,24 74:9 <b>impossible</b> 107:8 <b>impression</b> 15:22 18:25 22:3 51:2 54:14,16,18 72:3 73:16 74:11 <b>impressive</b> 77:20 <b>includes</b> 91:22 <b>including</b> 68:9 69:2 <b>inclusion</b> 74:6 <b>income</b> 72:20 <b>incumbent</b> 68:3 <b>INDEX</b> 4:2,9 <b>indicated</b> 23:18 <b>individual</b> 44:23 <b>individuals</b> 59:14 <b>information</b> 9:23 33:18 103:14,20 <b>initial</b> 55:12 <b>initially</b> 61:17,21 <b>ink</b> 86:21 <b>instruct</b> 46:21 98:21 <b>instructions</b> 55:17 <b>intend</b> 51:22 106:17,23 107:1 <b>intentions</b> 32:12</p>
--	---	---	---	---

<b>interest</b> 74:3 99:12	<b>Joe</b> 26:23	57:16,25 58:15	<b>Koch</b> 1:25 108:6,20	32:20,21 33:14
<b>interested</b> 16:17,19	<b>Jose</b> 38:14 39:10	61:17 63:3 64:6		35:1,1,15,23 36:6
55:14	45:20 48:18 60:6	65:20,21,22 68:2	<b>L</b>	42:16 43:6,10
<b>interests</b> 47:24 62:4	<b>JUNE</b> 108:23	69:13,15,16 70:7	<b>lack</b> 23:17 72:3	46:16,24 47:9,16
62:13		70:20,22,23 72:17	81:18	47:21,25 53:16,23
<b>interrupt</b> 98:10	<b>K</b>	72:18,19,22 73:4	<b>land-</b> 26:4	54:15 59:15,22
<b>interruption</b> 17:19	<b>Kaufman</b> 2:4	73:5,7,21,22 74:4	<b>landmark</b> 25:19	60:1 61:25 66:22
17:19	<b>KDNA</b> 39:14,17	74:7,17 77:14,18	26:4	78:4 97:21,23
<b>intervened</b> 45:25	<b>keep</b> 44:18 96:8	77:21 78:4,8,20	<b>language</b> 33:12	98:5 99:13 103:16
59:14	103:18	79:15,17,19 80:2	91:11	<b>lawsuits</b> 39:4
<b>intervening</b> 60:6,6	<b>Kennewick</b> 2:23	80:9,10,12,12,14	<b>laptop</b> 9:25	<b>lawyer</b> 18:8 20:24
61:18	<b>kind</b> 26:12 95:3	80:15,18,19 81:1	<b>large</b> 22:24 41:3	34:10 47:4 49:15
<b>intervenor</b> 2:2	101:16 103:21	81:1,7,13,14,15	69:6 70:13 72:19	64:14 83:16
48:20 49:18,21	<b>King</b> 82:19,21	81:16,23,25 82:4	73:21 74:17,20	103:23
59:22,25 60:19	<b>Klickitat</b> 92:1	82:16,24,24 83:3	85:7	<b>lawyers</b> 90:7 103:6
<b>intervenors</b> 61:8	<b>knew</b> 39:24 55:15	83:4,7,14,17,24	<b>largely</b> 12:7	<b>lay</b> 24:21
96:13	55:18	84:3,9,9,10,13,17	<b>larger</b> 91:15	<b>LD</b> 28:9 32:17
<b>Intervenors'</b> 48:22	<b>know</b> 5:10 7:19,20	84:19,19,25 86:1	<b>largest</b> 69:7,8 70:14	41:24
50:3,5	12:23 15:2,9,22	86:5,5,20,22 87:1	70:15 85:4 91:16	<b>leadership</b> 12:9
<b>involved</b> 14:22,24	15:25 16:3,4,4	87:2,3,6,7,10,14	91:18	25:24 31:7 73:23
16:5 53:5,7,15	17:23,24 19:23	87:16 89:5,9,10	<b>late</b> 98:3	91:5
67:13,24 75:18	20:12,16 21:4,8	89:11,14,15,16	<b>Latin</b> 13:21 42:6	<b>leads</b> 13:2
100:19 101:25	21:14 23:12 25:1	90:2,5,6,8,8,20	<b>Latino</b> 12:10 13:14	<b>learn</b> 67:25
102:4,19,19	25:6,7,18 26:10	91:3,4,6,7,8,10,14	14:1 39:18 68:10	<b>learned</b> 59:21
<b>involvement</b> 52:4	26:11,13,18,20,23	91:14 92:4,25	68:13 69:2 72:4	66:20
<b>involves</b> 17:12	26:25 27:3,24	93:6,8,9,17,17,19	72:12 73:9,15,18	<b>learning</b> 60:16,24
<b>Iraq</b> 7:8	28:5,20 29:23,25	93:24 94:3,7,16	73:21,22 74:12,18	61:7 66:15
<b>irregardless</b> 32:25	30:2,17 31:6,9,17	94:19 95:17 96:12	74:23 75:10,17,23	<b>leave</b> 79:23 82:3
83:14,18	31:17,19,21 32:6	99:20 100:9,10,18	76:20 77:1,5,8	<b>left</b> 11:8 82:6
<b>Ismael</b> 40:17 45:21	33:8,8,19,22,24	100:22,23 101:21	79:5 80:3 82:15	<b>legal</b> 2:10,14,18
48:18 63:23	34:1,5,9,12,16,17	101:22,23 102:3	85:23 87:23,24	13:21 19:23 22:8
<b>issue</b> 81:10 85:22	35:18,24 36:11,15	102:13,14,17,21	88:10 89:19,22	22:17 23:13,22
<b>issues</b> 21:6 53:9	36:22,24 37:2,3,5	103:1,3,7,11,13	90:15,18 91:6	62:10 64:19 66:24
95:19	37:12,14,20,22	103:15,15,15,21	94:5	72:6 79:25 98:23
<b>item</b> 84:8	38:2,12,14,16,23	103:21,21,24	<b>Latino-based</b> 12:8	99:20
	39:10,15,16,21,23	104:15,20,23	<b>Latinos</b> 69:8 70:15	<b>legislative</b> 6:11,13
<b>J</b>	40:2,8,10,17,19	105:5,15,16,16,22	75:17 76:25 79:18	18:10 26:2 92:13
<b>January</b> 27:23	41:4,4,10,11 42:5	105:25 106:24	<b>law</b> 2:22 37:21	107:2
46:13	42:10,18 43:3,23	<b>knowing</b> 20:14	40:21 41:5 53:12	<b>legislator</b> 66:16
<b>jar</b> 81:25	43:24,25 44:2,11	42:7 57:19	58:14 64:1	<b>legislature</b> 65:19
<b>Jason</b> 64:4	44:16 45:14 46:23	<b>knowledge</b> 81:5	<b>laws</b> 12:3,5 24:14	66:16 84:2 101:13
<b>Jeremie</b> 31:7,9,17	51:13 52:3,8,17	82:22 107:6	24:14,20,22	<b>let's</b> 100:24
31:18,23,24,25	52:19 53:8 54:1,2	108:10	<b>lawsuit</b> 14:23,24	<b>letter</b> 23:13 64:11
32:17,25 45:3	54:3,5,12,20,21	<b>known</b> 14:25 34:16	15:17 16:2,15	79:13,13,14 104:7
<b>Jim</b> 37:2 84:20	55:2,10,12,18,20	38:17,24 52:1	19:6,10 26:16	<b>letters</b> 104:5
<b>job</b> 84:15,15	56:3,6,8,16 57:16		29:20 30:8,21	

<b>letting</b> 27:14	<b>look</b> 26:5,9 36:14	94:6	44:2 50:23 57:18	53:24 66:3 105:10
<b>life</b> 11:24 13:1 14:7	46:3,5 49:24	<b>manner</b> 79:25	87:4	105:18
14:17 77:16 82:4	53:10 58:22 72:22	<b>manners</b> 67:18	<b>meeting</b> 84:20	<b>mistake</b> 77:10 91:8
<b>lifelong</b> 71:24	72:23 74:15 80:25	<b>map</b> 22:24 25:12	<b>meetings</b> 9:18	<b>mistakes</b> 77:10
<b>lifetime</b> 23:23 24:8	80:25 92:16 93:8	42:23 43:1,7,7,8	18:21 36:25 85:3	<b>misunderstanding</b>
<b>light</b> 17:19 53:23	<b>looked</b> 28:16 31:15	43:20 56:13,15	102:15	51:2 54:3 77:12
61:21	33:11 46:4 76:12	57:12,12 60:22	<b>Mel</b> 40:22,25	77:13 86:3 89:25
<b>lighting</b> 53:15	92:17 93:3,4	61:5,9,11 63:18	<b>member</b> 13:19 76:2	<b>mixing</b> 41:2
<b>lightly</b> 83:6	95:14	92:13 94:23 95:12	76:17 79:1 82:6	<b>moment</b> 22:20 34:3
<b>liked</b> 83:7	<b>looking</b> 15:17 31:6	96:2	91:7	63:2 70:4 85:24
<b>limit</b> 37:21	31:15 32:2,22	<b>maps</b> 17:5 21:3,4,7	<b>memory</b> 9:6 28:8	90:25 94:10 102:7
<b>line</b> 66:13 81:24	<b>looks</b> 24:16 25:12	21:11,13,15,16,21	<b>mentioned</b> 13:6,19	<b>Monday</b> 86:11 98:2
84:8	<b>Los</b> 2:20 3:4	22:1,2,3,10,13,21	23:18 24:20 25:3	98:2
<b>lines</b> 15:2,4 68:25	<b>lose</b> 33:1	23:23	39:25 51:24 85:15	<b>money</b> 29:25 93:19
94:25 95:2 96:4	<b>lot</b> 21:6 25:21	<b>March</b> 18:5 57:7	96:13 104:2	103:22 104:21
<b>list</b> 24:13	27:24 28:2 31:11	<b>Mark</b> 2:9 50:19,24	<b>message</b> 75:21 76:1	<b>money's</b> 103:15
<b>litigation</b> 3:10	33:24 35:19 36:7	62:19 96:19 105:5	76:11,13 78:13,18	<b>Monroe</b> 2:15
29:16 42:11,12	36:21,23,23 37:3	105:13	91:2,3	<b>month</b> 57:1 100:8
46:1,8 53:15 60:3	37:3 38:6 40:2,3	<b>marked</b> 4:11	<b>messages</b> 75:3	<b>months</b> 57:2 76:7
60:21	44:2 53:9 56:5,10	<b>mass</b> 77:18	81:10 85:21 89:8	104:10,10,11
<b>little</b> 9:19 16:7,18	73:6 80:5 86:19	<b>materials</b> 68:20	90:13 93:11	107:9
16:23 25:17 45:9	95:18 101:22	<b>Mattawa's</b> 92:9	<b>messaging</b> 76:8	<b>months'</b> 104:13
52:18,21 57:20	<b>low</b> 102:11	<b>matter</b> 5:12 7:13	<b>Messrs</b> 45:24 46:16	<b>Morfin</b> 2:22,22
59:12 65:16,17	<b>lower</b> 72:9,13,20	13:16 19:15 20:2	47:9	<b>morning</b> 5:10
66:8 67:4,5 75:14	73:5,8 74:12,22	20:3,7,9 77:14	<b>met</b> 5:10 15:9,11,23	99:16
87:2 90:9,11 91:2	74:23,24	78:1 83:18	15:24 39:11,13,22	<b>Motion</b> 48:21
92:3 93:18 94:18	<b>LULAC</b> 11:25	<b>matters</b> 33:11	40:1,6 44:2,10	<b>mountains</b> 12:12
95:2,4,7 101:10	13:19,20,24 25:9	79:12	57:17	38:5,7,8
<b>live</b> 6:13 30:3 88:10	33:9 39:16 42:5,8	<b>mayor</b> 38:25 39:15	<b>Mexican</b> 2:18	<b>move</b> 31:12 60:5
106:20	69:19 71:1	<b>mean</b> 12:4 19:4,23	<b>mgaber@campai...</b>	86:23
<b>lived</b> 6:15	<b>lunch</b> 73:5	25:14 26:9,21	2:13	<b>moved</b> 5:22,24
<b>lives</b> 83:3 102:23		27:13 28:15,18	<b>midyear</b> 81:7	51:14 61:18 86:18
<b>living</b> 10:13 72:1	<b>M</b>	31:9,24 33:8	<b>military</b> 6:23 7:7	87:1
<b>LLC</b> 2:4	<b>M</b> 1:25 5:8 41:19	36:14,21 38:4	10:15,17,19,20,23	<b>moves</b> 93:7
<b>loans</b> 23:24 24:3	50:21 71:9 101:6	45:12,14 46:3	31:10 83:1	<b>moving</b> 6:16 21:20
71:15	105:3 106:10	52:7 55:7,11 56:5	<b>mind</b> 5:13 43:22	56:8 60:7 100:7
<b>local</b> 24:13	108:6,20	59:19 64:5 69:5	<b>Mingle</b> 69:15 70:22	<b>MULJI</b> 2:9
<b>location</b> 9:25 21:20	<b>Maia</b> 16:12 29:1,2	69:18 70:12,25	<b>minimal</b> 81:6	<b>multiple</b> 29:18
23:12 100:1	30:8,23 34:21	84:5 93:5 95:9,19	<b>minority</b> 69:6	<b>mute</b> 62:20 66:3
<b>locations</b> 56:9	35:13 40:1 52:19	96:6 97:24 98:10	70:13	
<b>long</b> 7:5,6,15 8:21	55:10	<b>meaning</b> 12:6	<b>minute</b> 54:6 89:17	<b>N</b>
10:19 30:4 82:24	<b>mail</b> 104:6	<b>meant</b> 95:22	<b>minutes</b> 27:6 54:20	<b>N</b> 2:1 3:1 5:8,8
84:17,20	<b>Main</b> 2:4	<b>mechanism</b> 56:2	<b>missing</b> 70:1 71:8	41:19,19 50:21,21
<b>longer</b> 21:19 45:3	<b>making</b> 25:24	<b>medications</b> 9:5	<b>misspoke</b> 47:6	71:9,9 101:6,6
72:8 77:2 100:17	46:23 71:24	<b>meet</b> 25:5 37:4,17	<b>misstates</b> 53:17,18	105:3,3 106:10,10
	<b>Manice</b> 82:7 90:25			<b>name</b> 5:13 13:6

15:10,11 16:11 34:17 37:22 50:23 57:19 58:16,19,22 <b>names</b> 41:11 58:10 <b>NASA</b> 40:11 <b>nation</b> 75:17 79:18 <b>national</b> 12:1 13:9 13:11 69:20 71:2 103:11 <b>necessarily</b> 46:25 83:13 <b>necessary</b> 100:23 <b>need</b> 7:23 8:22 9:12 17:11 20:18 34:20 69:12 70:19 78:8 86:18,21 89:2 90:10 92:16 93:16 96:8 100:17 101:24 102:7 <b>needed</b> 6:24 23:12 51:3 <b>negatively</b> 88:9 <b>NEPA</b> 24:11 <b>never</b> 37:25 43:22 49:7 50:12,13 105:7,13,23 <b>nevertheless</b> 54:9 <b>new</b> 21:20 43:8 50:11 <b>Newhouse</b> 68:4 77:2 <b>news</b> 45:18 50:11 59:16,19,23 74:16 87:8 <b>newspaper</b> 31:12 53:10 75:2 81:23 <b>newspapers</b> 81:13 85:17 <b>nice</b> 40:5 44:11,17 50:23 51:6 <b>Nikki</b> 43:23 <b>nodding</b> 8:1 <b>non-</b> 12:24 <b>nonprofit</b> 10:24 <b>normal</b> 63:13 103:3	<b>North</b> 2:23 <b>NOS</b> 3:7 <b>notice</b> 20:12 58:8 81:19 <b>November</b> 18:5 57:11 <b>nowadays</b> 102:6 <b>number</b> 12:10 27:4 28:24,25 29:24 34:3,8 38:17,24 52:19 56:3 68:8 76:22 85:1 <b>numbers</b> 74:20 81:4 102:21 <b>NW</b> 2:11 <hr/> <b>O</b> <hr/> <b>O</b> 5:8 41:19 50:21 71:9 101:6 105:3 106:10 <b>o0o-</b> 5:3 107:24 <b>oath</b> 5:5 8:10 <b>object</b> 9:9 46:19 53:17 62:21 64:23 96:20 99:1 101:17 107:11 <b>objection</b> 14:9 15:19 17:6,8 18:16 22:16 23:21 53:24 54:23 66:3 72:5,15 88:1 95:16 98:25 101:18 103:17 104:17 105:10,18 107:13 <b>objections</b> 9:10 18:18 <b>observations</b> 101:14 <b>obviously</b> 25:4 36:3 49:22 53:7 54:5 81:2,2 <b>occur</b> 48:1 81:21,21 85:25 87:12 <b>occurred</b> 19:8 25:22 35:21 79:16	80:1,13 82:23 87:3 <b>occurring</b> 47:18 <b>off-line</b> 82:8 <b>offensive</b> 68:21 <b>offhand</b> 57:19 <b>office</b> 10:6 55:17 67:11 99:20 <b>officer</b> 38:23 <b>official</b> 1:7,16 <b>officials</b> 36:11 <b>oftentimes</b> 72:13 <b>oh</b> 6:3,7 7:6 13:11 21:23 23:11 28:19 38:22 42:14 47:15 57:8 64:15 65:7 80:7 99:21 101:21 <b>Okanogan</b> 91:25 92:2 <b>okay</b> 6:5,18 7:9,18 8:16,19,25 9:9,15 10:16 12:14 19:12 20:9,14 21:2 23:8 29:4 32:8,13 38:14 39:19 42:4 44:6,8 45:20 46:13 47:13 48:9 48:14 49:7,10,24 50:18 52:20 56:14 56:18 57:14,23 58:6,18 59:3 62:23 63:15 67:4 67:7 73:8 74:25 86:13 90:19,21 92:22 94:2,14 95:10,25 96:5,8 100:13,14 101:21 102:13 107:15 <b>old</b> 12:25 <b>old-school</b> 57:21 <b>oldest</b> 42:8 <b>Olive</b> 39:9 <b>Olmstead</b> 6:4 <b>once</b> 15:23,25 21:4 27:1 50:4 66:2	99:17 100:3 <b>one's</b> 106:3 <b>ones</b> 26:21 60:7 85:24 <b>open</b> 23:2 40:2 <b>operates</b> 101:11 <b>opinion</b> 22:8,9 24:17 25:22 33:4 54:11 <b>opportunity</b> 87:24 <b>opposite</b> 61:21 62:4 96:14 <b>Opposition</b> 48:21 <b>option</b> 84:10 <b>ORAL</b> 1:19 <b>order</b> 30:5 37:18 63:12 <b>organization</b> 13:7 14:1 16:8 42:8 103:11,12 <b>organizations</b> 91:10 <b>organized</b> 13:14 <b>original</b> 43:2 <b>originally</b> 43:2 <b>OSPI</b> 16:11 55:16 <b>Othello</b> 92:7 <b>outcome</b> 59:25 77:5 <b>outer</b> 97:12 <b>overall</b> 69:24 71:6 74:24 <b>overcome</b> 78:23 <b>overlap</b> 92:12 <b>Owens</b> 105:5,14 <hr/> <b>P</b> <hr/> <b>P</b> 2:1,1,9 3:1,1 <b>p.m</b> 101:5 107:21 <b>Pablo</b> 41:10 <b>packed</b> 86:19 <b>page</b> 4:3,10 34:18 49:10,12,24 <b>paid</b> 105:23 <b>Palmer</b> 1:12 20:10 45:10,16,25 46:8 46:18 47:11 49:21	50:25 59:15,22 60:1 61:9 <b>pamphlet</b> 29:12 <b>pamphlets</b> 29:9,10 29:22,24 30:11 55:14,20 <b>pandemic</b> 103:4 <b>papers</b> 45:12 <b>paperwork</b> 46:3 <b>parade</b> 44:3 <b>parallel</b> 66:22 <b>parents</b> 40:11 <b>Parkway</b> 2:23 <b>part</b> 10:21 11:25,25 13:8,24 14:1,2 32:19 42:5 50:13 69:19,19 71:1,1 91:11 92:3 <b>participants</b> 1:23 <b>participate</b> 102:2 <b>participation</b> 73:20 <b>particular</b> 22:22 24:3 25:19 26:4 49:3,6 60:20 72:12 73:13 74:11 <b>particularly</b> 89:3 <b>parties</b> 15:12,13 97:7 102:25 <b>parts</b> 92:3 <b>party</b> 11:10,16 13:16 36:5,16 40:2 75:5,6,10,20 76:3,4,12,19,23 77:7,11 78:1,10 78:14 79:9,23 80:24 81:20 82:17 85:18 88:8 101:11 102:19 <b>Pasco</b> 73:2 92:5 <b>pass</b> 30:2 <b>passed</b> 53:11 <b>passing</b> 38:4 <b>passionate</b> 56:6 <b>Paul</b> 26:25 27:3,4,5 29:23 31:1,4 32:3
---	--	--	--	---



34:22,23 35:14,14 41:10 51:25 52:1 <b>Pause</b> 35:8 <b>pay</b> 78:8 93:16,22 <b>paying</b> 35:19 103:6 104:15 <b>PCOs</b> 36:24 101:23 <b>peers</b> 43:13 <b>pejoratively</b> 17:20 <b>pending</b> 8:24 <b>people</b> 12:15,22 14:2,6,15 16:21 25:5 29:10 30:3 34:14 35:19 36:2 36:7,21,23,23 37:3,4 38:6 42:18 44:2 51:11 56:5 67:19 69:2,2,13 69:16,21,25 70:20 70:23 71:3,7 72:21 73:15 80:5 80:14,17,18,18 81:9,11 84:13 85:2,19 90:15 101:24 102:1,2,15 102:17 103:1 <b>people's</b> 77:23 <b>Per-</b> 94:6 <b>percent</b> 51:21 69:9 70:16 107:9 <b>period</b> 18:3 57:11 <b>permanent</b> 6:1 <b>permission</b> 89:25 <b>Perry</b> 25:10 42:10 42:11 82:7 <b>person</b> 12:15 15:16 16:1,8 27:17 34:23 35:15 44:11 71:22 72:9 88:21 <b>personal</b> 15:5 45:1 69:23 71:5 79:12 <b>personally</b> 16:16 25:22 37:5 44:11 45:7 81:14 <b>perspective</b> 28:21	72:7 <b>Phil</b> 64:8 <b>PHILLIPS</b> 2:10 <b>phone</b> 14:24 27:17 27:18,19,25 28:9 29:7 30:18 33:25 48:7 50:11 52:16 52:17 54:14 57:18 58:11,21 75:19,24 75:25 76:10,17 78:12 79:19 80:23 80:25 81:3,4,6 82:10 85:21 89:9 89:12,19,23 90:25 93:9 94:4,8 95:7 104:3 <b>phonetic</b> 82:7 <b>Physical</b> 5:17 <b>picture</b> 34:17 <b>pictures</b> 37:16,21 <b>PIERCE</b> 108:4 <b>Piñero</b> 37:14 <b>place</b> 56:13 77:22 99:25 <b>places</b> 25:3 <b>plaintiff</b> 1:5 2:2 15:17 16:2,15 19:10,13,16 20:3 20:21 30:21 <b>plaintiffs</b> 1:13 2:8 3:2 50:24 61:20 100:18 <b>Plaintiffs'</b> 48:21 <b>plan</b> 18:10 52:9,12 54:9 63:19 65:24 66:17 92:14 <b>planned</b> 9:24 <b>plans</b> 18:14 66:23 100:3 <b>play</b> 20:13 87:13 <b>please</b> 5:14,18 8:14 74:9 <b>pleased</b> 19:3 22:5 40:8 60:15,16 <b>plug</b> 102:7	<b>plus</b> 76:10 <b>pocket</b> 93:19 <b>point</b> 9:9 15:11 28:16 58:3 59:17 62:8 78:9 92:2 93:15,17 <b>points</b> 34:6 <b>police</b> 38:23 <b>political</b> 14:25 15:12 33:25 34:6 56:7 83:24 <b>politically</b> 30:14 83:12 <b>politicians</b> 28:3 72:4 90:7 <b>politics</b> 82:5 85:14 102:20 <b>population</b> 12:10 13:14 22:24 69:7 69:8,10 70:15,15 70:17 73:22 74:18 <b>position</b> 16:10 83:5 <b>positions</b> 73:23 <b>possibility</b> 29:16 <b>possible</b> 7:21 67:20 <b>possibly</b> 27:22 <b>potential</b> 25:6 29:19 30:8,12 <b>potentially</b> 16:15 35:23 <b>poverty</b> 72:24 <b>power</b> 99:8 <b>pray</b> 68:2 <b>pre-COVID</b> 101:21 <b>preparation</b> 10:8 <b>prepare</b> 9:15,17 <b>prescription</b> 94:20 <b>presence</b> 24:17 <b>pretty</b> 30:14 67:2 85:7 91:4 100:25 <b>price</b> 6:25 <b>primarily</b> 95:12 <b>primary</b> 57:17 58:7 67:16 68:15 73:14 73:18 75:11 87:21	106:14 <b>printer</b> 86:20 <b>prior</b> 71:18 104:7 <b>private</b> 7:13 44:14 <b>privilege</b> 79:19 97:10,12,16 99:6 99:9,11 <b>privileged</b> 17:13 46:25 62:21 64:23 96:21 97:1 <b>probably</b> 7:19 37:4 43:2 44:14 54:20 56:1 57:13 77:3 77:14 81:12 84:20 93:20 99:20 <b>problem</b> 44:25 52:25 61:13,24 62:3 65:13,14,16 82:16 <b>proceed</b> 50:6 66:23 <b>proceedings</b> 35:8 <b>process</b> 16:24 19:8 21:9 43:20 56:9 67:25 73:24 78:20 88:19 98:15 101:15 <b>program</b> 71:17 <b>Project</b> 3:3 <b>property</b> 100:12 <b>proportion</b> 74:13 <b>propose</b> 18:14 <b>proposed</b> 21:3,14 <b>protect</b> 11:22 <b>protecting</b> 11:20 42:21,22 43:14 <b>protection</b> 24:12 <b>proven</b> 74:15 <b>provides</b> 62:13 <b>public</b> 3:4 36:4,9 55:17 <b>pull</b> 95:7 <b>pulled</b> 94:23 <b>purpose</b> 55:6 73:6 <b>pursuant</b> 107:23 108:12	<b>push</b> 46:22 <b>put</b> 21:5 31:1 33:9 34:17 37:22 49:22 56:25 67:20 68:1 68:22 74:16 75:4 75:23 83:3 86:4 87:9 105:17 <b>putting</b> 37:22 79:22 87:2 <hr/> <b>Q</b> <hr/> <b>qualities</b> 12:9 <b>question</b> 8:7,13,24 8:24 9:12 10:18 14:13 17:9,18 19:25 23:3 35:10 46:21 47:1,3,6 53:20 54:24 58:14 60:25 65:2,6 70:8 70:9,11 83:22 92:25 93:2 96:20 96:25 97:4 98:25 103:20 <b>questions</b> 8:17,18 9:10 59:20 62:24 80:9,19 89:7 101:1,8 104:24 106:8,12 107:5,16 <b>quick</b> 7:20 48:4 <b>quicker</b> 63:13 <b>quirks</b> 25:14 <b>quit</b> 48:12 76:17,18 91:1 <b>quite</b> 6:8 21:5 29:25 34:17 67:24 81:23 82:24 92:12 94:21 103:3 <b>quitting</b> 79:2 <hr/> <b>R</b> <hr/> <b>R</b> 2:1,3 3:1,9 105:3 105:3 108:1 <b>race</b> 15:6 25:16 67:14,24 68:7 73:14 77:10 78:6 79:5,6 80:4 85:3
---	--	---	---	--



85:10 86:1,3 93:15 102:4 <b>racial</b> 22:7,11 24:7 24:16 25:21 27:9 28:9 29:20 30:8 32:23 33:6 35:21 42:2,19 43:12 46:17 47:10,17 52:13 53:1 54:10 94:12 <b>racially</b> 22:13 23:19 44:24 <b>radio</b> 39:18,18 <b>ran</b> 11:8 16:10 18:1 37:5 55:16 67:8 <b>RCW</b> 37:18 <b>re-</b> 22:21 35:20 76:2 <b>re-ask</b> 17:18 35:10 <b>reach</b> 67:19 69:12 69:25 70:19 71:7 101:24 <b>reached</b> 16:14 33:21 98:12 <b>read</b> 24:25 25:2 34:18 37:23 45:13 45:18 48:17 50:10 57:21 58:23 70:7 70:9 75:2 95:19 <b>reading</b> 65:17 94:19 95:19 107:22 108:12 <b>ready</b> 93:16 <b>real</b> 48:4 <b>realize</b> 100:14 <b>realized</b> 15:4 58:23 <b>really</b> 9:21 25:18 26:21 37:23 69:24 71:6 73:17 81:13 81:22 95:17,20 102:17 <b>realms</b> 14:25 <b>reason</b> 9:2 12:23 32:21,24 67:20 76:15,16	<b>reasons</b> 61:16 71:13 84:11 85:1 <b>recall</b> 7:6,16 15:11 16:6,8,23 17:23 18:13 21:2,21 25:4 27:13,13,15 28:6,11,12,14 33:19,20,22 34:3 34:8 35:18 38:4 38:13 45:21 52:18 56:4 58:10 69:3 75:7,12 <b>recalling</b> 22:21 37:15 <b>received</b> 86:6,9,14 98:14 100:3 104:6 <b>Recess</b> 41:18 70:5 101:5 <b>record</b> 5:11,14,16 9:11 17:14 35:6 38:7 70:4,6 97:18 99:14 105:11,19 <b>recorded</b> 7:22 <b>recruiting</b> 16:2 101:12 102:14 <b>rectify</b> 79:8 <b>red</b> 94:25 95:4,11 95:13 96:2,3 <b>redistricting</b> 15:1,4 16:24 17:5,22 18:4,9,14,22 19:7 21:3 24:23 26:19 26:20 27:5,6,9 31:6 33:5 35:21 36:2 39:1 40:14 41:7 44:22 52:5 54:19 55:5 63:19 <b>redrawn</b> 32:16 <b>refer</b> 66:24 <b>referring</b> 38:8 <b>regarding</b> 66:21 99:2 107:9 <b>regards</b> 39:5 94:6 <b>register</b> 29:11 69:22 71:4 74:8,9	76:24 <b>registered</b> 13:15 14:3 73:21 74:14 75:23 89:22 <b>registration</b> 13:16 74:12 <b>relate</b> 14:19 40:11 <b>relationship</b> 97:12 <b>relief</b> 59:24 96:14 <b>remain</b> 51:22 60:22 <b>remains</b> 59:11 <b>remediated</b> 51:20 <b>remember</b> 15:10 27:10 28:22 33:11 55:21 56:2 <b>removed</b> 91:2,11 <b>rep</b> 11:25 69:19 71:1 77:25 <b>rep-</b> 44:15 <b>repeat</b> 14:13 19:14 51:9,12 54:24 <b>repeating</b> 55:22 <b>report</b> 100:11 105:7,9,13 <b>REPORTED</b> 1:25 <b>reporter</b> 7:23 8:2 70:11 89:11 107:12 108:6 <b>reporters</b> 87:7 <b>represent</b> 5:12 12:15 50:24 58:4 59:14 60:1 62:13 67:21 69:16 70:23 72:8 73:15 <b>represent-</b> 25:7 <b>representation</b> 12:2,4,6,11,13 25:7 50:15 60:10 62:11 64:19 66:22 67:17 72:8 73:23 74:18 78:5 <b>representative</b> 14:16 21:18 31:9 31:13,17 32:10,11 40:9,15 45:2,3	55:16 77:1 83:18 84:2 <b>representatives</b> 69:11,24 70:18 71:6 <b>represented</b> 14:7 14:16 59:21 <b>representing</b> 44:18 61:8,10 62:8 74:1 74:2,5 <b>represents</b> 49:18,20 50:3 <b>reps</b> 69:12,14 70:19 70:21 <b>Republican</b> 11:17 12:1 13:7,9,11 36:5,10,11,16 67:15 68:4,6,8,14 69:20 71:2 75:5 75:10,19,23 76:3 76:4,12,18,23,24 77:7 78:14 79:9 79:23 81:20 82:15 82:17 84:4,11,18 84:24 85:9,18 87:21 88:8 89:22 101:11 <b>Republicans</b> 15:13 36:7 40:3 <b>request</b> 89:5 100:6 <b>requested</b> 107:22 108:12 <b>requests</b> 99:2 <b>required</b> 99:15 <b>requirements</b> 87:4 <b>requiring</b> 100:5 <b>research</b> 33:8 34:4 77:15 <b>reside</b> 51:15 <b>resident</b> 51:22 <b>resolve</b> 95:15 <b>respect</b> 87:20 90:12 91:9 <b>response</b> 92:18 <b>responsible</b> 52:9	<b>retainer</b> 64:13,15 <b>retired</b> 10:15,16,22 <b>retirement</b> 11:7 <b>return</b> 37:10 <b>returned</b> 7:8 82:4 98:11 <b>review</b> 10:8 <b>reviewed</b> 65:9 <b>reviewing</b> 68:19 <b>right</b> 10:5,13 12:15 15:10,17 19:21 20:7 23:4 33:2 35:16 36:9 38:9 42:18 43:5,11,16 43:17 48:5,10 51:7 52:16 54:11 57:22 58:12,23 59:7,10 60:17 61:4 63:8 65:4 66:17 67:8 68:10 74:22 77:22,22 78:2,24 79:2 82:11 83:8,12,13 83:21,21 85:6,8 86:6,10,14,17,17 86:21 87:25 88:11 88:20 91:20,23 92:5 93:12,14,23 97:13 102:9 106:21 107:6 <b>rights</b> 3:3 11:22 13:18 14:4 29:11 34:1 42:12,22,22 45:6 56:6 77:24 77:24 <b>ring</b> 59:1 <b>RNC</b> 75:18 76:2,17 78:11 79:1,13 82:3,6 91:7 <b>Road</b> 6:4 <b>RPR</b> 1:25 108:20 <b>Rule</b> 107:23 108:13 <b>rules</b> 7:19 20:13 <b>run</b> 11:10,12,16,18 47:22 68:1 71:14
---	---	---	--	---

82:20 84:24 85:13 101:12 <b>run-</b> 34:13 <b>running</b> 21:19 28:2 34:6 36:1,18 44:1 56:7 67:5,10 68:6 69:1 72:2 73:17 81:5 85:2,3 91:9 <b>rural</b> 12:18 <b>rush</b> 63:12 <b>Russian</b> 12:13	26:10,13 29:21 47:18,21,25 48:9 48:14,20,24 49:5 49:11,11 50:2,7 53:11 61:13,20,22 69:14 70:21 73:6 73:22 74:6 77:15 77:16,19 80:15,25 81:1 84:13 88:14 91:5 94:9,9,24,25 95:4,5,11,13,13 96:2,3 <b>seeing</b> 21:2,21 67:25 77:23 94:18 96:6 <b>seen</b> 20:17,22,22 21:11,14,16 22:10 23:23 48:25 49:7 105:7 <b>Seminole-Negro</b> 68:13 <b>Senate</b> 11:25 69:19 71:1 77:25 <b>senator</b> 44:4,7,9,15 44:15 83:9,24 84:17 85:8,12,12 <b>send</b> 19:9 81:10,12 85:21 94:22 <b>sense</b> 7:24 9:13 12:8,9 18:6 22:25 24:6 26:14 46:2 72:17 77:6 87:11 89:21 93:20 <b>sent</b> 19:2,5 20:23 50:25 85:15,16 89:9 104:8 <b>sentiments</b> 28:14 <b>SEPA</b> 24:11 <b>seriously</b> 92:25 <b>served</b> 11:21 31:18 32:6 45:12 46:2 49:1,3 88:17 <b>server</b> 88:19 98:15 <b>serves</b> 65:19 <b>service</b> 13:1	<b>serving</b> 16:15 88:21 <b>Sessler's</b> 80:18 <b>set</b> 43:7 95:21 108:14 <b>setting</b> 83:23 94:12 <b>settled</b> 7:14 79:11 <b>settling</b> 7:2 <b>seven</b> 26:22 <b>shaking</b> 8:1 <b>shape</b> 23:16 <b>share</b> 14:18 48:5 73:9 94:9 <b>shares</b> 14:7,17 <b>sharing</b> 50:19 <b>shift</b> 67:4 <b>shocked</b> 85:25 <b>shook</b> 40:7 84:6 <b>Shoot</b> 102:9 <b>shooting</b> 77:18 <b>shop</b> 99:22 <b>show</b> 47:13 48:4 98:23 99:15 102:15 <b>showed</b> 71:24 <b>showing</b> 9:20,20 20:12 <b>sic</b> 31:8 <b>sick</b> 9:5 <b>side</b> 12:11 38:5,7,8 38:10,11 <b>side's</b> 63:5 <b>sideways</b> 102:10 <b>signed</b> 47:25 49:12 96:15 97:5,9 <b>signing</b> 107:22 108:12 <b>similar</b> 82:15 <b>simply</b> 93:5 97:5 100:6 <b>Sims</b> 37:12,25 38:2 38:3 <b>sincere</b> 58:20 71:22 <b>sir</b> 17:16 <b>sit</b> 67:1 89:6 100:16 <b>situated</b> 95:11	<b>situation</b> 16:3,4 67:2 79:8 82:18 100:7 <b>six</b> 104:10,10,13 <b>skill</b> 108:10 <b>skip</b> 41:12 <b>slate</b> 101:16 <b>slow</b> 66:2 <b>smoothly</b> 7:21 <b>socioeconomic</b> 72:13 <b>somebody</b> 34:5 <b>somebody's</b> 77:16 <b>somewhat</b> 34:16 <b>SONNI</b> 3:3 <b>Sonni@uclavrp....</b> 3:5 <b>soon</b> 63:7 100:25 <b>sorry</b> 6:9 7:5,11,16 13:7,12,13 17:2 17:10 18:16 19:20 20:17 22:16 31:25 31:25 36:22 38:20 40:24 42:14 47:15 48:7 50:10 53:19 56:24 62:19 63:1 66:2 68:21 86:7 88:4 90:13 93:1,1 95:9,10 96:1,10 96:24 100:22 103:18 105:22 <b>sort</b> 47:4 77:6 83:10 96:15 97:5 97:14 101:15 <b>Soto</b> 1:12 20:10 45:10,16,25 46:8 46:18 47:11 49:21 50:25 59:15,22 60:1 61:9 <b>sounds</b> 7:18 13:5 35:12 38:3,3 87:20 90:13 <b>South</b> 2:19 72:12 <b>southern</b> 95:4 <b>Spanish</b> 68:25	75:21 91:3,11 <b>speak</b> 10:3 28:24 32:5 36:10 40:4 63:25 64:4 <b>speaker</b> 40:4 <b>speaking</b> 8:6 29:23 32:4 33:23 73:13 <b>speaks</b> 27:4 <b>species</b> 24:13 <b>specific</b> 25:14 57:1 <b>specifically</b> 25:12 33:13 58:9 <b>speculation</b> 72:16 <b>speech</b> 18:1 80:5,7 80:8 <b>spell</b> 82:7 <b>spent</b> 68:19 104:22 <b>spoke</b> 9:19 29:21 29:22 32:3 33:10 33:12,15 34:25 35:22 36:8,21,23 37:25 38:6 40:6 54:20 56:5 57:18 58:5 59:4 84:5 98:5 <b>spoken</b> 28:2 30:4 36:5 37:9,12 82:14 97:21 103:25 104:3 <b>spring</b> 2:19 98:5 <b>springtime</b> 57:6 <b>staff</b> 52:8 81:15 85:16 91:8 <b>staffers</b> 36:13 <b>staffing</b> 76:5 <b>stand</b> 98:25 <b>Starbucks</b> 99:22 <b>start</b> 20:11 93:13 93:20 <b>started</b> 19:18 31:5 32:2 60:14 <b>state</b> 1:8,8,15,16 5:12 16:10 21:8 24:14,23,24 40:9 44:4,15,15 53:12
---	--	---	---	---

55:16 56:14 69:7 69:7,8 70:14,14 70:15 71:16 75:4 75:10 76:3,4,12 76:22 77:7 78:14 79:9,14 81:20 82:16 84:2 85:5 85:12,17 88:8 91:18 101:13 108:3,7 <b>State-based</b> 103:12 <b>stated</b> 15:1 31:12 61:6 <b>statement</b> 62:17 <b>statements</b> 36:4,10 <b>STATES</b> 1:1 <b>stating</b> 5:13 <b>station</b> 39:18 <b>status</b> 72:13 <b>stay</b> 31:13 85:1 100:6 106:23 <b>Steve</b> 10:11 19:24 <b>STEVEN</b> 1:7,15 <b>Stokesbary</b> 2:3 4:7 9:11 10:4,10 14:9 15:19 17:6,8,10 18:16 20:25 22:16 23:21 33:21 34:9 34:24 35:3,16 46:19 47:2 49:13 49:17 54:23 55:24 58:4 62:19 64:22 65:5,18 66:2,16 72:5,15 88:1,3 95:16 96:19 97:8 97:22 98:19 99:1 101:18 103:17 104:1,17 105:10 105:18 106:7,11 107:15 <b>Stokesbary's</b> 33:17 <b>stop</b> 11:4 50:19 <b>storages</b> 86:20 <b>story</b> 40:9 <b>straightened</b> 100:9	<b>Street</b> 2:4,11,15,19 <b>stretching</b> 94:16 <b>strike</b> 6:12 29:14 48:22 52:11 61:2 <b>StrikeForce</b> 75:18 85:23 89:19 90:16 90:17,18 91:6 94:5 <b>strong</b> 78:21 <b>strongly</b> 14:3 43:14 45:4,6 77:24 <b>struggle</b> 102:14 <b>stuff</b> 95:20 100:7 100:10 <b>submit</b> 17:4,21,24 18:11 <b>subpoena</b> 9:24 46:8 46:11 49:2,4 50:25 64:12 86:9 92:18 95:20 98:14 99:18 100:4 <b>subpoenas</b> 23:11 23:11,13 86:6,14 88:14 <b>suggested</b> 28:9 34:22 35:13 55:2 <b>suggestion</b> 34:5 <b>Suite</b> 2:5,11,15 3:11 <b>summer</b> 21:23,25 <b>Sumner</b> 2:5 <b>Sunnyside</b> 38:22,23 <b>supervisors</b> 76:23 <b>support</b> 66:13 86:4 <b>supported</b> 75:17 78:10 79:18 <b>supporters</b> 75:4 <b>supposed</b> 53:12 69:16 70:23 94:20 100:2 <b>suppress</b> 75:10 77:8 87:22 <b>suppressed</b> 77:5 <b>suppressing</b> 76:19 89:14	<b>suppression</b> 78:3 79:4 <b>Supreme</b> 56:14 <b>sure</b> 8:16 25:24 28:1 41:4 48:5 58:13,19,20 73:24 86:24,24 92:23 93:6 98:2 102:8 105:1 107:9 <b>surfaced</b> 37:20 <b>surprise</b> 34:4 <b>surrounding</b> 75:3 <b>Susan</b> 1:12 20:10 <b>switch</b> 45:9 <b>switched</b> 76:11,19 89:23 <b>sworn</b> 5:5 108:9 <b>sympathetic</b> 52:24 <b>system</b> 36:17 43:4 75:19,25 79:19 80:23,25 81:3 89:20 <hr/> <b>T</b> <b>T</b> 5:8 41:19 50:21 71:9 101:6 105:3 105:3 106:10 108:1,1 <b>Tacoma</b> 1:22 5:1 51:7 54:4 99:16 99:19 <b>take</b> 41:15,16 57:24 58:21 70:4 72:22 72:23 78:23 79:12 79:25 83:6 100:8 100:13,24 101:2 <b>taken</b> 1:24 42:10 54:1 66:15 <b>talk</b> 8:3 29:10 53:4 66:24 67:5 75:14 83:23 <b>talked</b> 16:18 29:19 31:4 34:23,24 35:15 39:4 59:12 63:17 96:11 <b>talking</b> 20:16 28:21	30:17 34:6 35:19 41:5 56:19 58:9 80:9,16 86:1,2,8,8 87:7 <b>taqueria</b> 69:15 70:22 <b>Task</b> 90:15 <b>telephone</b> 75:3 <b>tell</b> 6:21 89:1 98:17 <b>tells</b> 9:11 <b>ten-plus</b> 24:8 <b>tends</b> 73:3 <b>term</b> 17:20 <b>terms</b> 83:24 101:12 <b>testified</b> 5:6 53:14 53:22 60:20 <b>testify</b> 86:10 <b>testimony</b> 9:3 53:18,25 86:15 <b>testing</b> 96:8 <b>Texas</b> 75:18 77:11 90:18 <b>text</b> 81:10 85:19,21 89:8 90:13 91:1,3 93:11 <b>texts</b> 90:14,24 94:4 <b>thank</b> 6:10 17:16 17:16 41:22 50:20 51:5 77:21 100:20 101:4 106:6 107:18,20 <b>thing</b> 30:23 33:2 52:19 54:2 77:22 78:2 83:8,21 94:19 <b>things</b> 23:17 25:1 25:20 28:16 31:20 32:22 34:2 36:8 56:7,10 66:20 69:18 70:25 75:9 76:21 82:25 83:1 83:2,5 86:5,19 97:9 103:2,3 107:9 <b>think</b> 14:5,14,18	22:13 23:2 25:15 26:1,22 32:11 33:15 35:3 44:14 55:25,25 56:1 57:6 63:2 64:3,5 72:7 82:11,21 84:3,4,9,14 86:11 88:7,16,18 93:3 94:3 95:21 96:25 97:14,17 98:1,22 101:2,2 102:14 104:3 106:5 <b>thinking</b> 32:22 40:20 <b>thinks</b> 54:9 <b>third</b> 77:11 78:10 <b>thought</b> 20:9 40:5 47:3 52:25 55:12 94:12,20 95:22 99:19 <b>thousand</b> 71:15 <b>three</b> 22:21 25:17 26:7 59:14 76:7 <b>throw</b> 83:6 <b>Thursday</b> 98:2 <b>time</b> 7:7,12 8:22 14:13 17:11 18:9 18:24 21:20,22,25 30:4,7 37:20 38:23 39:7,11,24 41:14 42:10 46:5 48:13 53:4 56:10 57:11 60:17,24 61:7,10 62:20 66:14,18,21 67:10 68:19 70:3 73:20 74:19 77:22 78:9 78:23 83:16 86:4 86:18,23 88:15,23 89:2 90:6,7 92:16 96:12 98:5 100:1 101:3 104:6,13,25 <b>times</b> 5:24 35:24 51:14 87:2 97:20 98:1 100:8 104:1
---	---	--	---	--

<p><b>tiny</b> 92:3</p> <p><b>today</b> 9:3,16 51:4 54:4 60:5 66:20 67:1 84:16 86:8 92:20 93:4 98:24 100:21 104:2 107:4</p> <p><b>today's</b> 64:11,17 98:17</p> <p><b>told</b> 35:12 42:5 60:25 77:11 79:1 82:18 96:12 98:23 106:3</p> <p><b>top-down</b> 101:15 101:23</p> <p><b>Toppenish</b> 72:22</p> <p><b>Torchinsky</b> 64:4</p> <p><b>Torres</b> 43:23 44:4,7 44:9,15,16,18 83:10,24 84:17 85:8</p> <p><b>touch</b> 31:1 55:23</p> <p><b>touched</b> 14:5,14</p> <p><b>trained</b> 23:25</p> <p><b>training</b> 89:18</p> <p><b>transaction</b> 6:24</p> <p><b>transcript</b> 108:8</p> <p><b>Transfer</b> 48:22</p> <p><b>transition</b> 5:25</p> <p><b>travel</b> 51:3</p> <p><b>traveling</b> 51:5 100:20</p> <p><b>Trevino</b> 38:14,16 38:17 39:2,8 45:20,24,25 46:16 47:9 60:20 63:21</p> <p><b>Tri-Cities</b> 44:3 73:3,7</p> <p><b>trial</b> 105:25</p> <p><b>trick</b> 58:13</p> <p><b>tried</b> 107:4</p> <p><b>trouble</b> 95:1 96:3</p> <p><b>Troyer</b> 37:2</p> <p><b>true</b> 68:16 107:7 108:10</p>	<p><b>truly</b> 11:22 13:15 13:17 69:12 70:19</p> <p><b>trusting</b> 90:6,7</p> <p><b>truthful</b> 9:3</p> <p><b>try</b> 8:6 29:24 30:5 48:12 51:9 73:20 74:8 82:9 84:9 102:5</p> <p><b>trying</b> 6:5 7:16 15:10 16:5 25:4 26:14 30:19 50:10 73:19 75:10 85:3 89:13 102:17 103:18</p> <p><b>Tuesday</b> 86:12 88:16,16</p> <p><b>turn</b> 81:7</p> <p><b>turnout</b> 74:22,24</p> <p><b>twice</b> 27:1 104:3</p> <p><b>two</b> 51:11 68:1 76:22,23 86:6,14 89:2 98:1</p> <p><b>type</b> 24:15 82:16</p> <p><b>typically</b> 20:11</p> <hr/> <p style="text-align: center;"><b>U</b></p> <hr/> <p><b>U</b> 105:3</p> <p><b>U.S</b> 11:8 34:14 47:22 71:14 86:1</p> <p><b>UCLA</b> 3:3</p> <p><b>Uh-huh</b> 26:17 30:6 50:1,9 62:2</p> <p><b>ultimately</b> 26:16</p> <p><b>Umm</b> 95:6</p> <p><b>unaware</b> 19:22 60:23 65:25</p> <p><b>unchanged</b> 60:22</p> <p><b>uncle</b> 65:14</p> <p><b>under-</b> 55:8</p> <p><b>understand</b> 7:22 8:10,14,17 12:18 20:8 24:1 49:20 54:8 59:6,10,13 61:3 63:25 65:15 69:12,13,24 70:19 70:20 71:6 86:16</p>	<p>88:13 89:2,13 92:16 94:15 99:5 99:8</p> <p><b>understanding</b> 21:17 24:9,12,13 24:19,21,22 26:15 45:15 52:15 53:2 55:8 79:3 99:15 103:8</p> <p><b>understands</b> 14:8 14:16</p> <p><b>understood</b> 8:4 10:2 20:18 23:15 26:14 30:16 31:22 43:21 45:8 48:3 100:4</p> <p><b>unequal</b> 87:24</p> <p><b>unexpectedly</b> 48:12</p> <p><b>unfortunately</b> 30:1 74:19</p> <p><b>United</b> 1:1 13:21 42:6</p> <p><b>unregistered</b> 13:25</p> <p><b>unusual</b> 22:23 26:8 52:11</p> <p><b>upset</b> 32:13,15 80:3 80:5,14</p> <p><b>use</b> 17:19 58:21,23 75:19 76:5 78:18 82:9</p> <p><b>useless</b> 58:24,25</p> <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <p><b>v</b> 1:6,14 20:7,20 45:10,16 47:11</p> <p><b>VA</b> 65:12,14</p> <p><b>Valley</b> 73:5,9</p> <p><b>verbal</b> 7:23</p> <p><b>verbally</b> 91:1</p> <p><b>versa</b> 8:7</p> <p><b>version</b> 91:3</p> <p><b>versus</b> 10:11</p> <p><b>Veterans</b> 31:19</p> <p><b>vetting</b> 36:17</p> <p><b>vice</b> 8:7</p> <p><b>victor</b> 77:3</p>	<p><b>video</b> 89:17</p> <p><b>videoconference</b> 1:19,23</p> <p><b>videos</b> 68:20,24</p> <p><b>Vietnamese</b> 12:12</p> <p><b>view</b> 14:6 62:8</p> <p><b>viewing</b> 48:8</p> <p><b>views</b> 84:22</p> <p><b>visit</b> 51:6</p> <p><b>Vogel</b> 58:14 64:1</p> <p><b>voice</b> 78:2,13</p> <p><b>voicemail</b> 76:9,11 76:19 81:19 89:23</p> <p><b>voluntarily</b> 50:4</p> <p><b>volunteers</b> 78:12,22 81:17 86:4</p> <p><b>vote</b> 13:15 14:3,20 16:21 29:11 30:3 66:15 69:21,22,23 71:3,4,5 74:14,19 74:20 76:1,13,20 77:5,8 79:5 84:9 85:9 87:23 89:14 106:14,17 107:1</p> <p><b>voted</b> 44:13 65:23 66:17 84:3,4</p> <p><b>voter</b> 43:3 74:12,22 74:23</p> <p><b>voters</b> 13:25 42:12 72:12 74:8,12,14 74:23 75:11 80:3 87:24 88:10 89:22 89:22</p> <p><b>votes</b> 73:18</p> <p><b>voting</b> 3:3 14:3 19:8 42:22 84:12</p> <hr/> <p style="text-align: center;"><b>W</b></p> <hr/> <p><b>W</b> 2:15</p> <p><b>WA</b> 2:5,23 3:11</p> <p><b>wait</b> 8:6 89:17</p> <p><b>waiting</b> 71:11</p> <p><b>waive</b> 24:2</p> <p><b>waiver</b> 96:16,18 97:1,6,11,13,16</p> <p><b>WAKNIN</b> 3:3</p>	<p><b>Walkinshaw</b> 37:14 38:1</p> <p><b>Walla</b> 92:3,3</p> <p><b>want</b> 6:3 7:19 8:16 13:22 15:14 16:1 16:5 21:23 27:21 36:20 37:10 40:12 41:16 42:23 43:1 43:17 44:18 45:9 49:10,24 51:1,9 58:13,15 61:4,11 61:19 66:23 67:4 73:19,22,23 74:1 74:6,9 79:10,24 83:1,2,19,21 84:13 87:13 91:5 92:24 94:7 96:14 99:9 100:15,16,19 101:10 103:14,21 107:18</p> <p><b>wanted</b> 14:1 29:9 30:2 34:15 51:13 54:15,17 67:19 75:4 89:14 90:3</p> <p><b>wanting</b> 29:21 102:2</p> <p><b>Wapato</b> 41:6</p> <p><b>Washington</b> 1:2,8 1:9,17,22 2:12 5:1 5:12,19 6:4 13:23 51:16 72:12 76:2 76:4,12,18,22 78:14 81:20 88:8 92:1 103:12 108:3 108:7</p> <p><b>wasn't</b> 21:9 30:1 32:15 52:7 54:18 60:4 65:13 85:13 92:23 93:6 100:23</p> <p><b>wavering</b> 48:1</p> <p><b>way</b> 42:13,15 43:2 47:18,21 50:14 56:17,19 83:19 91:24 100:20 102:23</p>
--	--	---	---	---



<b>ways</b> 84:12 <b>we'll</b> 8:21 <b>we're</b> 12:18 20:5 56:19 69:7 70:14 71:11 81:16,16,17 81:18 83:1 86:1,2 87:1 90:1 100:15 <b>We've</b> 87:1 89:17 89:18 <b>wear</b> 83:4 <b>website</b> 18:11 <b>week</b> 46:12,13 93:23 98:1,3,6,12 104:3 <b>weeks</b> 89:2 <b>welcome</b> 41:21 78:4 <b>Wenatchee</b> 76:24 <b>went</b> 31:5 48:11 53:13 56:17 63:4 67:25 74:7 84:8 <b>weren't</b> 37:17 <b>western</b> 1:2 38:8,10 38:10 <b>whatnot</b> 34:7 36:16 36:25 68:20 93:11 99:23 <b>whatsoever</b> 19:3 <b>WHEREOF</b> 108:14 <b>white</b> 68:15 72:14 74:14 <b>wife</b> 39:8 <b>Wikipedia</b> 34:18 <b>winning</b> 79:20 <b>winter</b> 27:21,21 56:25 <b>wintertime</b> 56:20 57:8 <b>withdrawn</b> 60:8 <b>witness</b> 5:4 17:16 41:17 50:19 62:25 63:3,6,10,15 96:24 101:4 107:20 108:14 <b>witnesses</b> 61:19	<b>wonderful</b> 80:15 <b>word</b> 79:17 80:22 <b>words</b> 28:19 72:20 <b>work</b> 8:8 11:1 18:4 18:25,25 24:6 52:4 59:7 71:18 79:20 93:25 <b>worked</b> 10:24,24 12:20,25 70:3 71:17 76:2 <b>working</b> 11:4 24:8 40:10,11 63:5 72:1 <b>works</b> 41:15 101:15 <b>world</b> 87:18 <b>worries</b> 32:1 95:3 <b>wouldn't</b> 34:4 73:4 84:16 97:15 <b>Wow</b> 82:12 <b>wrap</b> 100:25 <b>write</b> 79:13,13,14 <b>writing</b> 49:22 <b>written</b> 10:11 11:21 15:15 62:12 97:5 <b>wrong</b> 24:16 25:13 42:18 43:5 63:4 80:2 83:20	60:20 63:17 <b>yeah</b> 7:4 14:14 17:10 22:2,2 27:18 29:18 39:6 39:8,20 55:2 56:19 57:9,13 58:25 63:1,11 64:22 73:11 75:1 82:11 84:7 85:11 86:5 88:22 91:17 91:24 92:15 93:14 94:25 95:9,13 96:10 97:3 98:7 98:13,13 100:12 101:18 105:2 106:13 <b>year</b> 21:24 57:1 93:16 <b>years</b> 6:22 12:25 13:4 24:8 38:17 38:24 39:9 <b>yesterday</b> 58:5,16 58:17 59:10	<b>12:01</b> 101:5 <b>12:11</b> 107:21 <b>13</b> 6:13 <b>14th</b> 2:11 <b>15</b> 6:13,14,15 7:17 28:9 32:17 41:24 52:9 53:1,6 92:13 94:13 <b>15th</b> 18:5 21:19 26:7 31:8,16 106:20 107:1,2 <b>1925</b> 2:15 <b>1967</b> 13:13	<b>311</b> 5:19 6:7 51:16 <b>3250</b> 3:4
				<hr/> <b>4</b> <hr/> <b>4</b> 49:10,24 91:15 92:13 <b>40</b> 69:9,9 70:16,16 <b>400</b> 2:11 <b>4th</b> 11:13 12:7,15 36:15 47:24 67:21 69:10 70:17 74:4 75:1,23 76:14 78:5 79:14 82:20 82:21 87:21
			<hr/> <b>2</b> <hr/> <b>2000</b> 3:11 <b>20005</b> 2:12 <b>2003</b> 10:21 <b>2008</b> 10:21,23 <b>2012</b> 43:8 <b>2013</b> 7:16 <b>2015</b> 102:5 <b>2016</b> 67:16 102:6 <b>2019</b> 11:6 <b>202.736.2200</b> 2:12 <b>2021</b> 18:5,5 57:4,7 57:11 <b>2022</b> 21:25 27:21 27:23 57:4 67:8 98:5 106:14 <b>2023</b> 1:24 5:1 108:9 108:15 <b>2026</b> 13:23 108:23 <b>206.207.3920</b> 2:6 <b>206.464.7744</b> 3:12 <b>213.629.2512</b> 2:20 <b>2357</b> 1:25 108:20	<hr/> <b>5</b> <hr/> <b>5</b> 2:5 4:4 <b>50</b> 4:5 <b>50,000</b> 81:6 <b>509.380.9999</b> 2:24 <b>51</b> 12:25 13:4 71:18 <b>55</b> 2:15
		<hr/> <b>Z</b> <hr/> <b>zones</b> 19:7 72:20 <b>Zoom</b> 9:21 27:17 48:12 86:12		<hr/> <b>6</b> <hr/> <b>60603</b> 2:16 <b>643</b> 2:19 <b>6th</b> 108:15
	<hr/> <b>X</b> <hr/> <b>X</b> 5:8 41:19 50:21 71:9 101:6 105:3 106:10	<hr/> <b>0</b> <hr/> <hr/> <b>1</b> <hr/> <b>1,000</b> 12:19,22 <b>1/2</b> 2:4 <b>10,000</b> 76:9 89:22 <b>10:00</b> 41:18 <b>10:07</b> 41:18 <b>10:52</b> 70:5 <b>100</b> 107:9 <b>1003</b> 2:4 <b>105</b> 4:6 <b>106</b> 4:7 <b>11:06</b> 70:5 <b>11:54</b> 101:5 <b>1101</b> 2:11 <b>11th</b> 2:19		<hr/> <b>7</b> <hr/> <b>7</b> 49:12 <b>7:00</b> 88:17 <b>732</b> 2:23
	<hr/> <b>Y</b> <hr/> <b>Yakima</b> 5:20,23 15:2,15 21:6 24:25 25:2 26:6 31:19 37:16 72:24 73:5,8 74:13,16 74:23 76:24 85:7 91:19 92:2,9 94:16 95:5,12 101:13 <b>Ybarra</b> 39:21,23 40:15 45:21,24 46:16 47:9 48:19			<hr/> <b>8</b> <hr/> <b>800</b> 3:10 <b>82</b> 25:19 26:5 <b>822</b> 6:4
			<hr/> <b>3</b> <hr/> <b>3</b> 1:24 5:1 108:9 <b>3:22-cv-5035</b> 1:14 2:2,8 3:2,7 <b>3:22-cv-5152-RSL</b> 1:6 2:2 3:7 <b>30(e)</b> 107:23 108:13 <b>310.400.6019</b> 3:5	<hr/> <b>9</b> <hr/> <b>9</b> 108:23 <b>9:09</b> 5:2 <b>90</b> 51:21 <b>90014</b> 2:20 <b>90095</b> 3:4 <b>98104</b> 3:11 <b>98390-1444</b> 2:5 <b>98930</b> 5:19 6:4



51:16  
99336-8100 2:23