

ALBERTO MACIAS - 12/16/2022

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SUSAN SOTO PALMER, et al.,)
)
)
Plaintiffs,)
)
-vs-) No.
) 3:22-cv-05035-RSL
)
STEVEN HOBBS, in his)
official capacity as)
Secretary of State of)
Washington, and the STATE OF)
WASHINGTON,)
)
Defendants,)
)
And)
)
JOSE TREVINO, ISMAEL G.)
CAMPOS, and State)
Representative ALEX YBARRA,)
)
Intervenor-Defendants.)
)

REMOTE DEPOSITION OF ALBERTO ISAAC MACIAS

Friday, December 16, 2022

9:00 a.m. PST to 9:30 a.m. PST

Witness Location: Seattle, Washington

REPORTED BY:

Connie Recob, CCR, RMR, CRR
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<p>2</p> <p>1 A P P E A R A N C E S - R E M O T E 2 FOR PLAINTIFFS SOTO PALMER, et al., ON BEHALF OF 3 CAMPAIGN LEGAL CENTER:</p> <p>4 ANNABELLE HARLESS 5 BEN PHILLIPS - Legal Fellow 6 CAMPAIGN LEGAL CENTER 7 1101 14th Street Northwest, Suite 400 8 Washington, DC 20005 9 AHarless@CampaignLegalCenter.org 10 BPhillips@CampaignLegalCenter.org</p> <p>11 ON BEHALF OF UCLA VOTING RIGHTS PROJECT:</p> <p>12 SONNI WAKNIN 13 UCLA Voting Rights Project 14 3250 Public Affairs Building 15 Los Angeles, California 90095 16 Sonni@UCLAVRP.org</p> <p>17 FOR DEFENDANT STATE OF WASHINGTON: 18 ANDREW R.W. HUGHES 19 ASSISTANT ATTORNEY GENERAL 20 ATTORNEY GENERAL OF WASHINGTON 21 Complex Litigation Division 22 800 Fifth Avenue, Suite 2000 23 Seattle, Washington 98104 24 Andrew.Hughes@ATG.Wa.gov</p> <p>25 FOR INTERVENOR-DEFENDANTS: 26 BRENNAN BOWEN 27 HOLTZMAN VOGEL 28 Esplanade Tower IV 29 Suite 860 30 2575 East Camelback Road 31 Phoenix, Arizona 85016 32 (540) 341-8808 33 bbowen@holtzmanvogel.com</p>	<p>4</p> <p>1 FRIDAY, DECEMBER 16, 2022; SEATTLE, WASHINGTON 2 9:02 A.M. PST 3 *** 4 5 ALBERTO ISAAC MACIAS, 6 having been sworn/affirmed on oath to tell the truth, 7 the whole truth, and nothing but the truth, testified as 8 follows: 9 10 MR. BOWEN: Before we get going I just want to 11 get on the record. I know I talked with Sonni about 12 this beforehand. In previous depositions we agreed 13 that objection by one preserves it for all. Is 14 everyone still good with that today? 15 MS. WAKNIN: I'm fine with that today. 16 MR. BOWEN: Okay. 17 MR. HUGHES: I think that's a great idea, 18 Brennan. 19 MR. BOWEN: Perfect. All right. Then we will 20 jump on into it. 21 22 E X A M I N A T I O N 23 BY MR. BOWEN: 24 Q. Good morning Mr. Macias. My name is Brennan Bowen. 25 I'm an attorney with Holtzman Vogel. We represent the</p>
<p>3</p> <p>1 EXAMINATION INDEX</p> <p>2 3 EXAMINATION BY: PAGE NO. 4 BY MR. BOWEN 4 5 6 7</p> <p>8 EXHIBIT INDEX</p> <p>9 EXHIBIT NO. DESCRIPTION PAGE NO. 10 Exhibit 1 Screenshot 19 11 12</p> <p>13 WITNESS INSTRUCTED NOT TO ANSWER</p> <p>14 15 (None) 16 17 INFORMATION REQUESTED 18 19 (None) 20 21 22 23 24 25</p>	<p>5</p> <p>1 intervenor defendants in this matter. Thanks for your 2 time today. I know it's a busy time of year and you 3 probably have a lot better things to do than be taking 4 a deposition so I appreciate you being here. My plan 5 is to keep this as short and painless as possible, 6 start off with some general questions about you and 7 your background and then get to some more case specific 8 stuff, and if all goes well, hopefully this doesn't 9 take more than an hour. 10 Could you please state your full name and spell it 11 for the record? 12 A. Of course. My full name is Alberto Isaac Macias. 13 First name is Alberto, A-L-B-E-R-T-O. Middle name is 14 Isaac, I-S-A-A-C. Last name is Macias, M-A-C-I-A-S. 15 Q. And do you prefer Mr. Macias, Alberto? What would you 16 like to be called? 17 A. Alberto is fine. 18 Q. Alberto, all right. Have you ever been deposed before, 19 Alberto? 20 A. I have not, no. 21 Q. Okay. I'm just going to go over a few ground rules 22 then before we get started. I know we have a court 23 reporter here. Is anyone else recording this? Do you 24 have any recording devices on your end? 25 A. No.</p>

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<p>6</p> <p>1 Q. Okay. And also just for the record, I know we have a</p> <p>2 stenographer here. Normally when we are talking to</p> <p>3 each other, we would do things like nod our head and</p> <p>4 shake our head and stuff like that, but they're not</p> <p>5 going to be able to get that on the record, so even if</p> <p>6 it's just a short yes or no, could you answer all the</p> <p>7 questions with a verbal response?</p> <p>8 A. Of course.</p> <p>9 Q. Okay. Perfect. And I know that Zoom has a mute</p> <p>10 function but I'd ask that during the deposition you</p> <p>11 don't use that unless we're taking a break.</p> <p>12 Is that okay?</p> <p>13 A. Yeah, that's fine.</p> <p>14 Q. Okay. Thank you. And also, if you need a break at any</p> <p>15 point in time, just let me know. Like I said, I don't</p> <p>16 intend this to go long, but if you need to, I</p> <p>17 understand.</p> <p>18 Is there anyone else in the room with you who's not</p> <p>19 on camera?</p> <p>20 A. No, there is not.</p> <p>21 Q. Okay. Will you let me know if anybody else enters the</p> <p>22 room?</p> <p>23 A. Of course.</p> <p>24 Q. Perfect. Do you have any applications open on your</p> <p>25 computer that someone could use to communicate with you</p>	<p>8</p> <p>1 Q. Okay. If your attorney objects or if anybody objects,</p> <p>2 those are for later proceedings. Unless your attorney</p> <p>3 specifically instructs you not to answer my questions,</p> <p>4 I'm going to ask that you still answer them, okay?</p> <p>5 A. Yes.</p> <p>6 Q. All right. If you need to take a break at any time, I</p> <p>7 think I already said that, just let me know.</p> <p>8 And finally, are you on any medications that could</p> <p>9 affect your ability to fully and truthfully answer or</p> <p>10 is there any other reason that you might not be able to</p> <p>11 fully and truthfully answer questions today?</p> <p>12 A. No, not today.</p> <p>13 Q. Okay. Other than conversations with attorneys, did you</p> <p>14 do anything to prepare for today's deposition?</p> <p>15 A. I did touch up on the court case itself and also looked</p> <p>16 into representatives for both my county and neighboring</p> <p>17 counties.</p> <p>18 Q. Okay. When you say "touch up on the court case," what</p> <p>19 did you look at?</p> <p>20 A. We looked -- correction. I looked into proper</p> <p>21 deposition procedure as well as the main focus of the</p> <p>22 trial.</p> <p>23 Q. Okay. And what do you understand the main focus of the</p> <p>24 trial to be?</p> <p>25 A. From my understanding the trial is encompassed around</p>
<p>7</p> <p>1 during this deposition?</p> <p>2 A. No.</p> <p>3 Q. Okay. And do you have any like phones, tablets,</p> <p>4 anything like that within eyesight that someone could</p> <p>5 use to communicate with you?</p> <p>6 A. No.</p> <p>7 Q. Okay. Because we're on Zoom, I'm going to take extra</p> <p>8 care not to talk over you. I ask that you would do the</p> <p>9 same for me. Maybe we can give each other just a</p> <p>10 couple-second pause in between questions and answers.</p> <p>11 That way it just keeps the record clean and makes</p> <p>12 everything easy and will also allow to the extent your</p> <p>13 attorneys or anybody else has objections, they can get</p> <p>14 those on the record.</p> <p>15 Does that work?</p> <p>16 A. Yes, indeed.</p> <p>17 Q. Okay. You understand that you are under oath today?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And that oath has the same effect as though you</p> <p>20 were testifying in court. If any of my questions are</p> <p>21 unclear, just let me know. I'll rephrase them. If you</p> <p>22 start to answer them, I'm just going to assume that you</p> <p>23 understood the question.</p> <p>24 Does that work?</p> <p>25 A. Yes.</p>	<p>9</p> <p>1 the redistricting of District 15 and how it inhibits</p> <p>2 Latino voting rights.</p> <p>3 Q. Okay. Did you speak with anyone besides your lawyers</p> <p>4 about preparing for the deposition?</p> <p>5 A. I have not, no.</p> <p>6 Q. Okay. We'll get just to some more case specific stuff</p> <p>7 in a minute, but we'll start with a little bit of</p> <p>8 general background.</p> <p>9 Could you walk me through some of the places that</p> <p>10 you have lived in the last ten years or so?</p> <p>11 A. Of course. So I've lived in Yakima, Washington my</p> <p>12 entire life. I am currently in Seattle for a few</p> <p>13 months to do -- well, attend university.</p> <p>14 Q. Okay. What degree program are you working on?</p> <p>15 A. Psychology.</p> <p>16 Q. All right. And when did you -- when did you start that</p> <p>17 program or I guess, strike that.</p> <p>18 When did you move to Seattle?</p> <p>19 A. I apologize. That's a bit confusing due to COVID. I</p> <p>20 came to Seattle about three years ago; however, due to</p> <p>21 COVID I did move back to Yakima and it wasn't until</p> <p>22 about six months ago that I came back.</p> <p>23 Q. Okay. Where would you say that you reside more? More</p> <p>24 Seattle? More Yakima?</p> <p>25 A. I consider Yakima my location of residence.</p>

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<p>10</p> <p>1 Q. Okay. What's your address in Yakima?</p> <p>2 A. Of course. It is 1517 Cherry Avenue, Yakima,</p> <p>3 Washington.</p> <p>4 Q. Okay. And when you're staying in Seattle, what's your</p> <p>5 address?</p> <p>6 A. It is 9527 Interlake Avenue north.</p> <p>7 Q. Okay. And I know you said you're in college right now.</p> <p>8 Is this first degree, second degree you're working on</p> <p>9 in college?</p> <p>10 A. It's my first bachelor's degree.</p> <p>11 Q. Okay. Very exciting. And before that did you have any</p> <p>12 other vocational training?</p> <p>13 A. No, I did not.</p> <p>14 Q. Okay. Where did you go to high school?</p> <p>15 A. I went to AC Davis.</p> <p>16 Q. And where is that located?</p> <p>17 A. It is located in Yakima. Excuse me. It is located in</p> <p>18 Yakima though I do not know the address.</p> <p>19 Q. Okay. No worries, just approximate works.</p> <p>20 Did you do any kind of work in between finishing up</p> <p>21 high school and heading to college?</p> <p>22 A. No, I did not.</p> <p>23 Q. Do you have any work experience while you're in high</p> <p>24 school or college?</p> <p>25 A. In high school, I was a tutor at my high school and in</p>	<p>12</p> <p>1 Q. Okay. Switching more towards the redistricting</p> <p>2 commission, when did you first become aware of its</p> <p>3 existence?</p> <p>4 A. I cannot tell you exact time since it's been going on</p> <p>5 for a while, but definitely sometime in 2021, yeah.</p> <p>6 Q. Okay. Did you attend any of the commission's public</p> <p>7 meetings?</p> <p>8 A. I did not, no.</p> <p>9 Q. Okay. And did you, like, submit anything to the</p> <p>10 commission, either, like, comments or concerns?</p> <p>11 A. I did not, no.</p> <p>12 Q. Okay. What are your thoughts generally about the</p> <p>13 redistricting process in Washington as you understand</p> <p>14 it?</p> <p>15 A. If I may clarify, do you mean the process that the --</p> <p>16 we went through for the 2021 redistricting?</p> <p>17 Q. Yes.</p> <p>18 A. Okay. From my understanding from what I've read at</p> <p>19 least, the way the redistricting worked is</p> <p>20 professionals have come to redistrict the districts,</p> <p>21 more specifically District 15, to have a majority</p> <p>22 Latino voting age population based on the census</p> <p>23 itself.</p> <p>24 Q. Okay. And you said from what you've read. What did</p> <p>25 you read?</p>
<p>11</p> <p>1 college I am currently working at a tamarillo.</p> <p>2 Q. And I'm unfamiliar with the term. What is that?</p> <p>3 A. My apologies. It is simply a small tamale shop.</p> <p>4 Q. Oh, it's a good time of year for tamales.</p> <p>5 Would you -- have you ever had any work experience</p> <p>6 or volunteer experience in any sort of political</p> <p>7 activity?</p> <p>8 A. I have done some canvassing for Yakima city council</p> <p>9 candidates but that is all.</p> <p>10 Q. Okay. And when did you do that?</p> <p>11 A. I did them, I believe, in both 2016 and 2020.</p> <p>12 Q. Okay. And was it for any specific candidates or just</p> <p>13 for the city council as a whole?</p> <p>14 A. I did it for specific candidates.</p> <p>15 Q. Okay. Do you recall were they Republicans or Democrats</p> <p>16 or both?</p> <p>17 A. They were both Democrats.</p> <p>18 Q. Okay. And how do you identify -- strike that.</p> <p>19 What do you identify your race as being?</p> <p>20 A. When considering the options in the census itself, I</p> <p>21 always put other.</p> <p>22 Q. Okay. What about your ethnicity? How do you identify</p> <p>23 that?</p> <p>24 A. In terms of ethnicity, I consider myself Latino</p> <p>25 Hispanic.</p>	<p>13</p> <p>1 A. I've read both -- I've read Google articles as well as</p> <p>2 verbal communication.</p> <p>3 Q. Okay. What verbal communication, just like talking</p> <p>4 with friends or --</p> <p>5 A. No, speaking to attorneys.</p> <p>6 Q. Okay. Do you recall how many commissioners were on the</p> <p>7 commission?</p> <p>8 A. Can I clarify? Who is considered a commissioner? Just</p> <p>9 to ensure I don't mix up different individuals.</p> <p>10 Q. Commissioners would be those elected or appointed to</p> <p>11 sit on the redistricting commission who are responsible</p> <p>12 for drawing the maps and ultimately propose the final</p> <p>13 maps.</p> <p>14 A. Okay. Perfect. Thank you. I do not know.</p> <p>15 Q. Okay. So you couldn't say how many were Republican and</p> <p>16 how many were demo accurate?</p> <p>17 A. No.</p> <p>18 Q. Okay. Would you happen to recall how many nonpartisan</p> <p>19 chair members might have been on the commission?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did you review the final map that the commission</p> <p>22 passed?</p> <p>23 A. I have, yes.</p> <p>24 Q. Okay. When did you first review this map?</p> <p>25 A. I reviewed it during the time in which I was</p>


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<p>14</p> <p>1 considering joining the trial that we are in today.</p> <p>2 Q. Okay. And how did you -- strike that.</p> <p>3 You said you were considering joining. What had</p> <p>4 you considering joining?</p> <p>5 A. I was told about this case by a family friend.</p> <p>6 Q. Okay. And that's how you came to be involved in the</p> <p>7 case then?</p> <p>8 A. Yes, indeed.</p> <p>9 Q. Is that family friend an attorney?</p> <p>10 A. No.</p> <p>11 Q. Okay. When you first looked at the final map the</p> <p>12 commission proposed, what were your thoughts on it?</p> <p>13 A. For me, the most important part of this entire trial is</p> <p>14 District 15. I currently do not reside in District 15</p> <p>15 and as I was thinking about it, I came to realize that</p> <p>16 I don't feel it's right that myself as well as my</p> <p>17 fellow community members aren't able to be represented</p> <p>18 by the people that we want to represent and vote for</p> <p>19 the people that we want to vote for.</p> <p>20 Q. Okay. And to your understanding, how does the map as</p> <p>21 it's currently drawn prevent you from being represented</p> <p>22 by the people you want to represent you?</p> <p>23 A. I personally am currently in District 14 and District</p> <p>24 15 had candidates I personally supported greatly and</p> <p>25 wanted to vote for. However -- I apologize. However,</p>	<p>16</p> <p>1 Hispanic citizen voting age population.</p> <p>2 Do you know what that percentage is?</p> <p>3 A. If I recall, it is 50.2 percent.</p> <p>4 Q. Okay. And did you agree with that percentage?</p> <p>5 MS. WAKNIN: Objection to form.</p> <p>6 BY MR. BOWEN:</p> <p>7 Q. You can go ahead and answer.</p> <p>8 A. On the surface level, I would definitely agree with it;</p> <p>9 however, once proper investigation or understanding of</p> <p>10 the situation, I don't feel that I agree with it.</p> <p>11 Q. What -- what proper investigation and understanding are</p> <p>12 you referring to?</p> <p>13 A. Online research that I have done.</p> <p>14 Q. Okay. What -- I guess, what number do you feel would</p> <p>15 be better in your opinion?</p> <p>16 MS. WAKNIN: Objection to form.</p> <p>17 BY MR. BOWEN:</p> <p>18 Q. You can answer.</p> <p>19 A. I feel that a better number would potentially be</p> <p>20 55 percent if not focusing on changing the</p> <p>21 redistricting to not -- focusing on changing the</p> <p>22 redistricting not so that it has a higher percentage,</p> <p>23 if not a higher turn back rate for voting.</p> <p>24 Q. What do you mean by "turn back rate for voting"?</p> <p>25 A. I'm referring to the amount of Latinos that are</p>
<p>15</p> <p>1 due to the fact that I wasn't in District 15, I wasn't</p> <p>2 able to vote for them nor did I have the chance to</p> <p>3 truly understand their campaigns.</p> <p>4 Q. And what about the way the maps were drawn prevented</p> <p>5 you from understanding their campaigns?</p> <p>6 A. It wasn't quite the maps being redrawn if not the fact</p> <p>7 that I was focusing on those who I could vote for.</p> <p>8 Q. Okay. Were there maps proposed by any of the other</p> <p>9 commissioners during the redistricting process that you</p> <p>10 would have preferred over the final map?</p> <p>11 A. I did not do research on that.</p> <p>12 Q. Okay. So had you reviewed any of the initially</p> <p>13 proposed maps by any of the commissioners before the</p> <p>14 final map was passed?</p> <p>15 A. No.</p> <p>16 Q. Okay. Do you know -- I know you mentioned voting age</p> <p>17 population and specifically I think the Hispanic voting</p> <p>18 age population of Legislative District 15 earlier.</p> <p>19 Do you know what that percentage is?</p> <p>20 MS. WAKNIN: Objection. Form.</p> <p>21 THE WITNESS: If I recall--</p> <p>22 MR. BOWEN: I'll rephrase.</p> <p>23 BY MR. BOWEN:</p> <p>24 Q. Okay. We were talking about LD15 and the way the final</p> <p>25 map was drawn and it had a particular percentage of</p>	<p>17</p> <p>1 actually voting in the elections.</p> <p>2 Q. Okay. And do you have any experience in drawing</p> <p>3 legislative maps or redistricting?</p> <p>4 A. I do not, no.</p> <p>5 Q. Okay. In your amended complaint you guys bring two</p> <p>6 different claims. Could you just tell me about those</p> <p>7 from your own perspective?</p> <p>8 A. The two claims, if I recall correctly, one of which is</p> <p>9 that there was intent in the way in which the</p> <p>10 districting was drawn in order to reduce Latino</p> <p>11 population, I suppose, voice. The second is the</p> <p>12 ways -- the way in which the current map is drawn</p> <p>13 reduces Latino voter power.</p> <p>14 Q. Okay. And just for the record, are you reading off of</p> <p>15 anything right now or as you think, is it just</p> <p>16 sometimes you're talking through it to yourself?</p> <p>17 A. Yeah, I'm talking through it to myself. I apologize.</p> <p>18 Q. No apologies necessary. We all think different ways.</p> <p>19 I just wanted to make sure.</p> <p>20 I guess, in your own words maybe, can you tell me</p> <p>21 what you think this case is about?</p> <p>22 A. This case is about the fact that the 2021 redistricting</p> <p>23 of District 15 is meant to, on a surface level, make it</p> <p>24 seem that Latino voters have more power in District 15.</p> <p>25 However, upon further investigation, it's notable that</p>

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<p>18</p> <p>1 this redistricting doesn't really give Latino voters</p> <p>2 more power and if not reduce -- reduce it by separating</p> <p>3 them into different districts.</p> <p>4 Q. Okay. Did you vote in this past election, the 2020 mid</p> <p>5 terms a couple weeks ago?</p> <p>6 A. I did, yes.</p> <p>7 Q. Okay. And when you voted, what district were you</p> <p>8 voting in?</p> <p>9 A. I was voting in District 14.</p> <p>10 Q. Okay. But you said that you think Latinos in District</p> <p>11 15 are not able to elect candidates of their choice; is</p> <p>12 that correct?</p> <p>13 A. I must have misspoken. I mean that myself as a person</p> <p>14 from District 14 am not able to vote for candidates</p> <p>15 that I wish to vote for.</p> <p>16 Q. Okay. I apologize for the pause. I'm just thinking of</p> <p>17 how to frame this question.</p> <p>18 Is it your opinion that the way the map is drawn</p> <p>19 affects only District 14 or affects both District 14</p> <p>20 and 15?</p> <p>21 MS. WAKNIN: Objection. Form.</p> <p>22 BY MR. BOWEN:</p> <p>23 Q. I'll ask. Is it your opinion that the map as drawn</p> <p>24 affects District 14?</p> <p>25 A. I believe so.</p>	<p>20</p> <p>1 to open this up and then attempt to screen share.</p> <p>2 BY MR. BOWEN:</p> <p>3 Q. Okay. Is that sharing the image that I dropped in the</p> <p>4 chat?</p> <p>5 A. Yes, it is.</p> <p>6 Q. Okay. And Alberto, could you confirm for me it says</p> <p>7 this is the Secretary of State's website?</p> <p>8 A. Yes, it does.</p> <p>9 Q. Okay. And this is Legislative District 15, correct?</p> <p>10 A. Yes, indeed.</p> <p>11 Q. And it would have been for November 8th, 2022, general</p> <p>12 election, the most recent general election?</p> <p>13 A. That is correct.</p> <p>14 Q. Okay. And going down to the state senate race right</p> <p>15 here, there should be two candidates. Is that what</p> <p>16 you're seeing?</p> <p>17 A. Yes, indeed.</p> <p>18 Q. And one of those candidates you already mentioned Nikki</p> <p>19 Torres, right?</p> <p>20 A. Yes.</p> <p>21 Q. And the other one I'm seeing Lindsey Keesling. Is that</p> <p>22 who you're seeing as well?</p> <p>23 A. That is correct.</p> <p>24 Q. Okay. And who won that race?</p> <p>25 A. The person who won the race is Nikki Torres.</p>
<p>19</p> <p>1 Q. All right. Is it your opinion the map as drawn affects</p> <p>2 District 15 also in the ways you've described</p> <p>3 previously?</p> <p>4 A. Yes, indeed.</p> <p>5 Q. Okay. Do you happen to know who was running for state</p> <p>6 senate in District 15 this last election cycle?</p> <p>7 A. I recall Nikki Torres although I do not recall the</p> <p>8 other senate recipients.</p> <p>9 Q. Okay. And do you know what party Nikki Torres was?</p> <p>10 A. I do not recall off the top of my head.</p> <p>11 Q. Do you know if she won her race?</p> <p>12 MS. WAKNIN: Objection. Form.</p> <p>13 THE WITNESS: I do not.</p> <p>14 BY MR. BOWEN:</p> <p>15 Q. Okay. I'm going to put an exhibit in the chat. Please</p> <p>16 bear with me while I pull this up. I think I can just</p> <p>17 drop it in.</p> <p>18 (Exhibit No. 1 marked</p> <p>19 for identification.)</p> <p>20 MR. BOWEN: Can you let me know that showed</p> <p>21 up?</p> <p>22 MS. WAKNIN: It does, Brennan. Are you going</p> <p>23 to share screen?</p> <p>24 MR. BOWEN: I just wanted to make sure</p> <p>25 everybody had it and make it easy on Connie. I'm going</p>	<p>21</p> <p>1 Q. Okay. And what political party does she prefer?</p> <p>2 A. She prefers the Republican party.</p> <p>3 Q. Okay. And what -- if you could, what percentage of the</p> <p>4 vote did she get according to this website?</p> <p>5 A. She got 67.68 percent.</p> <p>6 Q. Okay. As someone who previously resided in the Yakima</p> <p>7 area, do you think that she represents the candidate of</p> <p>8 choice for the Latino community?</p> <p>9 MS. WAKNIN: Objection to form.</p> <p>10 MR. HUGHES: I'll also object. That calls for</p> <p>11 a legal conclusion and expert opinion.</p> <p>12 MS. WAKNIN: I'm going to join the objection.</p> <p>13 Calls for expert opinion.</p> <p>14 BY MR. BOWEN:</p> <p>15 Q. Okay. I'll rephrase.</p> <p>16 Just in your lay understanding based on</p> <p>17 communications with friends and family, do you think</p> <p>18 Nikki Torres is a candidate that a lot of Latinos</p> <p>19 preferred in Legislative District 15?</p> <p>20 MR. HUGHES: Objection. Lack of foundation.</p> <p>21 MS. WAKNIN: Objection. Speculation.</p> <p>22 Objection. Lack of foundation.</p> <p>23 BY MR. BOWEN:</p> <p>24 Q. You can go ahead and answer.</p> <p>25 A. I'm not really sure.</p>

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<p style="text-align: right;">22</p> <p>1 Q. I'm going to go ahead and exit screen sharing so please</p> <p>2 just bear with me here. All right.</p> <p>3 Just in wrapping up, Alberto, are there any things</p> <p>4 you wished I had asked as we went through the</p> <p>5 deposition today?</p> <p>6 A. Nothing in particular, no.</p> <p>7 MR. BOWEN: Okay. And does anybody else have</p> <p>8 any questions?</p> <p>9 MS. WAKNIN: None for me.</p> <p>10 MR. HUGHES: Nothing from the state.</p> <p>11 MR. BOWEN: Okay. Then we are going to wrap</p> <p>12 this up. Alberto, I appreciate you taking the time.</p> <p>13 Again, I know it's a fun time of year with a lot more</p> <p>14 enjoyable things to do than be in a deposition, so I</p> <p>15 appreciate you making time for this, and we are going</p> <p>16 to conclude now and go off the record.</p> <p>17 (Signature reserved.)</p> <p>18 (Deposition concluded at 9:30 a.m.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">24</p> <p style="text-align: center;">DEPOSITION ERRATA SHEET</p> <p>1</p> <p>2</p> <p>3 Our Assignment No. 1259</p> <p>4 Case Caption: SOTO PALMER vs. HOBBS, ET AL.</p> <p>5</p> <p>6 DECLARATION UNDER PENALTY OF PERJURY</p> <p>7</p> <p>8 I declare under penalty of perjury</p> <p>9 that I have read the entire transcript of</p> <p>10 my Deposition taken in the captioned matter</p> <p>11 or the same has been read to me, and</p> <p>12 the same is true and accurate, save and</p> <p>13 except for changes and/or corrections, if</p> <p>14 any, as indicated by me on the DEPOSITION</p> <p>15 ERRATA SHEET hereof, with the understanding</p> <p>16 that I offer these changes as if still under oath.</p> <p>17</p> <p>18 Signed on the ____ day of _____, 2022.</p> <p>19</p> <p>20 _____</p> <p>21 ALBERTO MACIAS</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">23</p> <p style="text-align: center;">REPORTER'S CERTIFICATE</p> <p>1</p> <p>2</p> <p>3 I, CONNIE A. RECOB, the undersigned Certified Court</p> <p>4 Reporter, pursuant to RCW 5.28.010 authorized to</p> <p>5 administer oaths and affirmations in and for the State</p> <p>6 of Washington, do hereby certify that the sworn</p> <p>7 testimony and/or proceedings, a transcript of which is</p> <p>8 attached, was given before me at the time and place</p> <p>9 stated therein; that any and/or all witness(es) were</p> <p>10 duly sworn to testify to the truth; that the sworn</p> <p>11 testimony and/or proceedings were by me</p> <p>12 stenographically recorded and transcribed under my</p> <p>13 supervision, to the best of my ability; that the</p> <p>14 foregoing transcript contains a full, true, and</p> <p>15 accurate record of all the sworn testimony and/or</p> <p>16 proceedings given and occurring at the time and place</p> <p>17 stated in the transcript; that a review of which was</p> <p>18 requested; that I am in no way related to any party to</p> <p>19 the matter, nor to any counsel, nor do I have any</p> <p>20 financial interest in the event of the cause.</p> <p>21 WITNESS MY HAND and SIGNATURE this 16th day of</p> <p>22 December, 2022.</p> <p>23 </p> <p>24 CONNIE A. RECOB, RMR, CRR</p> <p>25 Washington Certified Court Reporter, CCR 2631</p> <p>connie@lakesidereporting.com</p>	<p style="text-align: right;">25</p> <p style="text-align: center;">DEPOSITION ERRATA SHEET</p> <p>1</p> <p>2</p> <p>3 Page No. ____ Line No. ____ Change to: _____</p> <p>4 _____</p> <p>5 Reason for change: _____</p> <p>6 Page No. ____ Line No. ____ Change to: _____</p> <p>7 _____</p> <p>8 Reason for change: _____</p> <p>9 Page No. ____ Line No. ____ Change to: _____</p> <p>10 _____</p> <p>11 Reason for change: _____</p> <p>12 Page No. ____ Line No. ____ Change to: _____</p> <p>13 _____</p> <p>14 Reason for change: _____</p> <p>15 Page No. ____ Line No. ____ Change to: _____</p> <p>16 _____</p> <p>17 Reason for change: _____</p> <p>18 Page No. ____ Line No. ____ Change to: _____</p> <p>19 _____</p> <p>20 Reason for change: _____</p> <p>21 Page No. ____ Line No. ____ Change to: _____</p> <p>22 _____</p> <p>23 Reason for change: _____</p> <p>24 SIGNATURE: _____ DATE: _____</p> <p>25 ALBERTO MACIAS</p>

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