

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

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Remote
Deposition Upon Oral Examination of
Ismael G. Campos
October 13, 2022

Defendant State of Washington, on the eve of the deadline to file this document, and Intervenor-Defendants, with just hours left before the deadline to file this document, provided and adopted extensive edits that substantially expanded on the objections they asserted to these deposition designations. This maneuver deprived Plaintiffs of a meaningful opportunity to respond and therefore deprived the Court of additional substantive responses from the Plaintiffs' perspective.

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REPORTED BY:
LAKESIDE REPORTING
Jeanne M. Gersten, RDR, CCR 2711
(833) 365-3376
Jeanne@LakesideReporting.com
Contact@LakesideReporting.com

Intervenor-Defendants join with the State in their stated objections throughout this transcript.

Ismael G. Campos

October 13, 2022

| Page 1 | Page 2 |
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| <p>UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON</p> <hr/> <p>SUSAN SOTO PALMER, et al.,) Plaintiffs,) v.) STEVEN HOBBS, in his official) capacity as Secretary of State) of Washington, and the STATE OF) WASHINGTON,) No. 3:22-cv-05035-RSL Defendants,) and) JOSE TREVINO, ISMAEL G. CAMPOS,) and State Representative) ALEX YBARRA,) Intervenor-Defendants.)</p> <hr/> <p>REMOTE DEPOSITION UPON ORAL EXAMINATION OF ISMAEL G. CAMPOS</p> <hr/> <p>Thursday, October 13, 2022 9:29 a.m. to 12:29 p.m.</p> <p>REPORTED BY: LAKESIDE REPORTING Jeanne M. Gersten, RDR, CCR 2711 Registered Diplomat Reporter (833) 365-3376 Jeanne@LakesideReporting.com Contact@LakesideReporting.com</p> | <p>1 APPEARANCES: 2 (Via Zoom videoconferencing) 3 FOR THE WITNESS and INTERVENOR-DEFENDANTS: 4 ANDREW R. STOKESBARY 5 CHALMERS & ADAMS, LLC 6 1003-1/2 Main Street, Suite 5 7 Sumner, Washington 98390-1444 8 DStokesbary@ChalmersAdams.com</p> <p>8 FOR PLAINTIFFS SOTO PALMER, et al., 9 on behalf of CAMPAIGN LEGAL CENTER: 10 SIMONE LEEPER 11 ANNABELLE HARLESS 12 ASEEM MULJI 13 BEN PHILLIPS, Legal Fellow 14 CAMPAIGN LEGAL CENTER 15 1101 14th Street Northwest, Suite 400 16 Washington, DC 20005 17 SLeeper@CampaignLegalCenter.org 18 AHarless@CampaignLegalCenter.org 19 AMulji@CampaignLegalCenter.org 20 BPhillips@CampaignLegalCenter.org</p> <p>21 FOR PLAINTIFFS, ON BEHALF OF MALDEF: 22 ERNEST HERRERA 23 DEYLIN THRIFT-VIVEROS 24 Mexican American Legal Defense and Educational 25 Fund (MALDEF) 634 South Spring Street, 11th Floor Los Angeles, California 90014 EHerrera@MALDEF.org DThrift-Viveros@MALDEF.org</p> <p>21 FOR PLAINTIFFS, on behalf of MORFIN LAW FIRM: 22 EDUARDO MORFIN 23 MORFIN LAW FIRM, PLLC 24 7325 West Deschutes Avenue, Suite A 25 Kennewick, Washington 99336 Eddie@MorfinLawFirm.com (Continued on next page)</p> |
| Page 3 | Page 4 |
| <p>1 APPEARANCES, continued: 2 3 FOR DEFENDANT STATE OF WASHINGTON: 4 ANDREW R.W. HUGHES 5 KARL SMITH 6 Assistant Attorneys General 7 ATTORNEY GENERAL OF WASHINGTON 8 Complex Litigation Division 9 800 Fifth Avenue, Suite 2000 10 Seattle, Washington 98104 11 Andrew.Hughes@ATG.Wa.gov 12 Karl.Smith@ATG.Wa.gov 13 14 ***** 15 16 EXAMINATION INDEX 17 ISMAEL G. CAMPOS PAGE 18 By Ms. Leeper 4 19 By Mr. Stokesbary 92 20 21 ***** 22 EXHIBITS 23 (None offered) 24 25</p> | <p>1 October 13, 2022, Remote Proceedings: 2 PROCEEDINGS: 9:29 a.m. 3 (Discussion off the record.) 4 ISMAEL G. CAMPOS, 5 having been sworn/affirmed on oath to tell the truth, the 6 whole truth, and nothing but the truth, testified as 7 follows: 8 EXAMINATION 9 BY MS. LEEPER: 10 Q Good morning, Mr. Campos. My name is Simone Leeper, 11 and I am one of the attorneys that is representing the 12 plaintiffs in this case. I want to sort of introduce for 13 you the other counsel that are on the phone with us. 14 So there's going to be Karl Smith, who represents 15 the Secretary of State, but he will not be speaking during 16 today's deposition. There's Andrew Hughes, who represents 17 the State of Washington. And, of course, you know your 18 attorney, Mr. Stokesbary. 19 There's also on the line a number of other attorneys 20 representing the plaintiffs, but they're not going to be 21 speaking with you today. It's just going to be a 22 conversation between the two of us. 23 I want to go over just a couple of ground rules 24 about how this deposition is going to go and how we can 25 make everyone's life easier, especially Jeanne's in the</p> |

1 (Pages 1 to 4)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 5 | Page 6 |
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| <p>1 process; but before I do that, have you ever been deposed 2 before? 3 A No, ma'am. 4 Q Okay. Thanks for letting me know that. 5 So one of the things that's going to make Jeanne's 6 life easier is if we do not talk over one another. And 7 she covered this a bit off the record, but just to 8 reiterate, if I can get my full question out, and then 9 I'll be sure to make sure that I let you get your full 10 answer out; and if we try our best not to overlap with one 11 another, that will just make for a much cleaner record and 12 make Jeanne's life a little bit easier. 13 Something else is that this is obviously going to be 14 a written transcript, so we need to keep our responses 15 verbal. So I know it's an inclination I have to nod or 16 shake my head, or to say things like uh-uh or um-hmm to 17 answer a question. That's not very clear on the record; 18 so if you could keep it to yes or no answers and keep 19 everything out loud, that will be sure that we record your 20 full testimony. 21 Do you understand that? 22 A Yes, I do. I'm sorry. I have a fly flying around 23 here. 24 Q Don't worry, if you have to swat a fly, I promise I 25 won't let it break up our momentum.</p> | <p>1 Something else just to keep in mind is that if you 2 don't understand any of the questions that I ask you today 3 at any point in time, that's okay. You should just ask me 4 for clarification about the question, and I can rephrase 5 it or explain it again. But if you do answer a question 6 that I ask, I'm going to assume that you understood the 7 question and are able to answer it. 8 Does that make sense to you? 9 A Yes. Yes. 10 Q Okay. This is hopefully not going to be too, too 11 long today; but if at any point you find yourself needing 12 to take a break to go to the restroom or get a drink of 13 water, or if you're just a little bit tired, that's 14 totally okay. 15 All I would ask is that you don't ask to take a 16 break when a question is still pending, and just maybe 17 give me a little bit of notice, and we'll be sure that we 18 take a break at a time that works for you and we get 19 through the line of questioning we're in. 20 Does that make sense? 21 A Um-hmm; yes. 22 Q Okay. And then one last thing is that the way 23 depositions work is that some of the attorneys present 24 might object to the form of some of the questions that I 25 ask. If that happens, that objection is going to be noted</p> |
| Page 7 | Page 8 |
| <p>1 for the record, but you still must answer the question 2 that I asked. 3 Does that make sense to you? 4 A Yes. Yes. 5 Q Okay. All right. Mr. Campos, could you please 6 state and spell your full name for the record? 7 A Ismael G. Campos. I-S-M-A-E-L, G, Campos, 8 C-A-M-P-O-S. 9 Q And it seems you broke up a little bit. Could you 10 say your middle initial again one more time? 11 A That's G like in George, Gonzalez. 12 Q Okay. Great. Thank you. 13 And is there anything in particular that you prefer 14 I call you today during the deposition? 15 A Mel is good. 16 Q Okay. Great. Thanks, Mel. You can call me Simone. 17 So what is your address? 18 A 9008 West Rio Grande, Kennewick, Washington. 19 Q And also for the record what is your race? 20 A My what? 21 Q Your race. 22 A My rate? 23 Q Race, like ethnicity. 24 A Oh, race. Okay. I'm Mexican. 25 Q All right.</p> | <p>1 A I'm sorry, I was hearing a T at the end. 2 Q I'll be sure to enunciate. 3 So in today's deposition I'm going to be using the 4 terms Hispanic and Latino interchangeably, and when I 5 refer to white residents I'm going to be referring to 6 white residents who do not identify as Hispanic or Latino. 7 Do you understand that? 8 A Um-hmm; yes. 9 Q Mel, do you understand that you're under oath today? 10 A Yes, I do. 11 Q Is there any reason why you can't give truthful 12 answers to my questions? 13 A No reason. 14 Q Are you taking any medications that might impair 15 your memory? 16 A No. 17 Q And do you have any conditions that might impair 18 your memory? 19 A No. 20 Q Okay. So part of the oath that you took today was 21 to tell the whole truth, and so what that means in the 22 context of this deposition is that you need to provide 23 full and complete answers to the questions that I ask. 24 Do you understand that? 25 A Yes.</p> |

2 (Pages 5 to 8)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 9 | Page 10 |
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| <p>1 Q Sometimes it might happen that later on in the</p> <p>2 deposition you might remember some additional details or</p> <p>3 clarification to an answer that you gave to a previous</p> <p>4 question that I had. If that happens, you should say so</p> <p>5 at the time and let me know that you want to add to or</p> <p>6 clarify a previous answer that you gave, and we'll go</p> <p>7 ahead and do that right then when it's still fresh on your</p> <p>8 mind.</p> <p>9 Does that work for you?</p> <p>10 A Yes.</p> <p>11 Q Okay. And finally, is there any reason why you</p> <p>12 cannot give full, complete and accurate testimony today?</p> <p>13 A Nope.</p> <p>14 Q Mel, have you ever been a party to a lawsuit?</p> <p>15 A No.</p> <p>16 Q Okay. So I want to talk a little bit about how you</p> <p>17 prepared for this deposition today. Did you meet with</p> <p>18 anyone in person, by phone, by Zoom, or in any other way</p> <p>19 to prepare for this deposition?</p> <p>20 A Nope.</p> <p>21 Q I'm going to ask you this and be very clear, I'm not</p> <p>22 asking about the content of any of your conversations, but</p> <p>23 did you have any meetings with an attorney to prepare for</p> <p>24 this deposition?</p> <p>25 A Other than with Drew the other day as far as making</p> | <p>1 sure that I'm not apprehensive or anything like that, you</p> <p>2 know, that was it.</p> <p>3 Q Okay. And how many times did you meet with Drew --</p> <p>4 and that's Drew Stokesbary, your attorney -- to prepare</p> <p>5 for this deposition?</p> <p>6 A Just that one time, yeah.</p> <p>7 Q Okay. And was anyone other than yourself and Drew</p> <p>8 present for that meeting?</p> <p>9 A I can't remember what his name was, but there was</p> <p>10 another person there.</p> <p>11 Q And was that an attorney or someone who wasn't an</p> <p>12 attorney?</p> <p>13 A I think it was an attorney, yes.</p> <p>14 Q Okay. About how long did that meeting last?</p> <p>15 A Fifteen, 20 minutes.</p> <p>16 Q Did you review any documents during that meeting?</p> <p>17 A No.</p> <p>18 Q Did you take any notes during the meeting?</p> <p>19 A No.</p> <p>20 Q Other than your attorneys, did you discuss this</p> <p>21 deposition with anyone else?</p> <p>22 A Nope.</p> <p>23 Q You didn't discuss it with any commissioners from</p> <p>24 the Redistricting Commission?</p> <p>25 A No. I didn't talk to anybody, no.</p> |
| Page 11 | Page 12 |
| <p>1 Q How about any of the commission staff?</p> <p>2 A No.</p> <p>3 Q Any members or representatives of a political party?</p> <p>4 A Nope.</p> <p>5 MR. STOKESBARY: Objection as to form,</p> <p>6 vague.</p> <p>7 Q (By Ms. Leeper) Did you discuss this deposition with</p> <p>8 any legislators?</p> <p>9 A No.</p> <p>10 Q Mel, are you familiar with an individual named</p> <p>11 Paul Campos?</p> <p>12 A Oh, yes, ma'am. He's my brother.</p> <p>13 Q And your brother was employed by the Senate</p> <p>14 Republican Caucus working on the 2021 redistricting</p> <p>15 process; is that right?</p> <p>16 MR. STOKESBARY: Objection --</p> <p>17 A Yes.</p> <p>18 MR. STOKESBARY: -- as to form.</p> <p>19 Q (By Ms. Leeper) I'm sorry, your answer got cut off,</p> <p>20 Mel. What was your answer?</p> <p>21 A No. Sorry. What was the question? I'm sorry, it</p> <p>22 was jumping around.</p> <p>23 Q Yeah, of course. The question was whether your</p> <p>24 brother was employed by the Senate Republican Caucus</p> <p>25 working for the 2021 redistricting process.</p> | <p>1 A Yes.</p> <p>2 Q Okay. Did you discuss this deposition with your</p> <p>3 brother?</p> <p>4 A No, other than -- Well, no.</p> <p>5 Q You said "other than." What was that that you were</p> <p>6 thinking there?</p> <p>7 A When this process started they were asking for</p> <p>8 documentation, or I forget what the wording was, but</p> <p>9 communications or whatever; and in that I got -- I said,</p> <p>10 "Hey, Paul, did we ever discuss the redistricting process</p> <p>11 that you're in, and as far as the 15th District? And did</p> <p>12 we send anything?" And he said, "No, we haven't discussed</p> <p>13 it."</p> <p>14 Other than the political conversation we had with</p> <p>15 politics, we never remembered or recalled any</p> <p>16 communications per this redistricting issue.</p> <p>17 Q Okay. So I want to dive into sort of some subparts</p> <p>18 there just to get some clarification.</p> <p>19 Who was asking for that documentation?</p> <p>20 A I'm thinking Drew.</p> <p>21 Q Okay. And you said that you spoke with Paul about</p> <p>22 how you guys hadn't talked about redistricting outside of</p> <p>23 I think you said the political parts of it.</p> <p>24 What did you mean by that?</p> <p>25 A Oh. We're Republicans, and we discuss politics.</p> |

3 (Pages 9 to 12)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 13 | Page 14 |
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| <p>1 Q Okay. And did you talk about that sort of in the</p> <p>2 context of redistricting?</p> <p>3 A No, no, no. Just politics in general. That's what</p> <p>4 we do. We're Republicans. We discuss everything from --</p> <p>5 just stuff.</p> <p>6 Q Okay. And did you ever talk about politics in the</p> <p>7 context of Legislative District 15?</p> <p>8 A No. Well, --</p> <p>9 Q And did you --</p> <p>10 A Hold on.</p> <p>11 Q Sorry. Please continue.</p> <p>12 A Other than the fact that I was considering running</p> <p>13 there, and I asked what his opinion would be; but as far</p> <p>14 as the redistricting itself, no. I'm sorry.</p> <p>15 Q Okay. I'll probably ask you some more questions</p> <p>16 about that later on, but right now just a few more</p> <p>17 questions on this point.</p> <p>18 Did you ever have discussions with your brother</p> <p>19 about how redistricting might impact sort of Republicans</p> <p>20 in Washington?</p> <p>21 A No.</p> <p>22 Q Okay. Is there anyone else that you spoke with</p> <p>23 about this deposition?</p> <p>24 A Nope.</p> <p>25 Q Have you had any written communications with anyone</p> | <p>1 besides your counsel to prepare for this deposition?</p> <p>2 A Nope.</p> <p>3 Q Did you review any documents in preparation for this</p> <p>4 deposition?</p> <p>5 A Just the document that Drew sent me as far as the --</p> <p>6 What's it called? The -- I don't know what the document</p> <p>7 is called. The -- Where it explains what the plaintiffs</p> <p>8 are doing and this stuff, and that I'm the intervenor and</p> <p>9 yada yada.</p> <p>10 Q Okay. Was that to your knowledge like a legal</p> <p>11 filing in this case?</p> <p>12 A What's that?</p> <p>13 Q Was that a legal filing in this case that you</p> <p>14 reviewed?</p> <p>15 A Yeah, I'm assuming. Yeah.</p> <p>16 Q Okay. Did you receive a copy of that document from</p> <p>17 Mr. Stokesbary?</p> <p>18 A Yes.</p> <p>19 Q And do you have that document with you today?</p> <p>20 A Well, it's on my screen behind your -- that -- this</p> <p>21 Zoom meeting.</p> <p>22 Q Okay. So on that note, what do you have open on</p> <p>23 your browser right now?</p> <p>24 A Actually, I think it's where Drew sent me the phone</p> <p>25 for this. Actually, I don't have it up.</p> |
| Page 15 | Page 16 |
| <p>1 Q Okay. And is there anything else, any other windows</p> <p>2 visible for you right now?</p> <p>3 A My calendar, Zoom meeting, my email, and then that's</p> <p>4 it.</p> <p>5 Q Okay. And any papers in front of you?</p> <p>6 A No. It's just a lot of stuff.</p> <p>7 Q Okay. So just for the purposes of while we're in</p> <p>8 this deposition, it's sort of a closed room. So if you</p> <p>9 could go ahead and close your email; and if you have like</p> <p>10 a Mac and you're able to see your texts and things coming</p> <p>11 up on your screen, if you could go ahead and close that</p> <p>12 out, too, that would be appreciated.</p> <p>13 A Close my email is what you're asking?</p> <p>14 Q Yes, please.</p> <p>15 A If I hit the post-attendee Zoom, would that kick you</p> <p>16 guys out?</p> <p>17 Q No, it won't. If that's your web browser that's</p> <p>18 open and it says post-attendee Zoom, it's sort of like --</p> <p>19 There's a blue button in the middle usually. If you can X</p> <p>20 out of that, there's no problem there.</p> <p>21 A Microsoft Home, if I X out of that it won't kick you</p> <p>22 out?</p> <p>23 Q It will not.</p> <p>24 A All right. It's the computer screen with clouds.</p> <p>25 Q Okay. Great. It's just us now. Thank you very</p> | <p>1 much for doing that. I appreciate it.</p> <p>2 So even if not in preparation for this deposition,</p> <p>3 have you reviewed any documents filed in this case?</p> <p>4 A No.</p> <p>5 Q Have you reviewed the Complaint in the case?</p> <p>6 A I don't know the document that Drew sent me to, you</p> <p>7 know, explain that I'm an intervenor and that kind of</p> <p>8 thing. I don't know what, if that's a Complaint or not.</p> <p>9 Q Okay. So besides the meeting that we already</p> <p>10 discussed with Drew, what else did you do to prepare for</p> <p>11 this deposition?</p> <p>12 A Prayed. That was it. Nothing.</p> <p>13 Q Okay. It's never bad to have God on your side.</p> <p>14 A There you go.</p> <p>15 Q About how long in total do you think that you spent</p> <p>16 preparing for this deposition?</p> <p>17 A Fifteen minutes reading that document, 20.</p> <p>18 Q Okay. So earlier we touched on the fact that your</p> <p>19 brother, Paul Campos, was a staffer for the House</p> <p>20 Republican Caucus during the 2021 redistricting process;</p> <p>21 correct?</p> <p>22 A Yes.</p> <p>23 Q Have you ever discussed anything related to this</p> <p>24 case with him?</p> <p>25 A Nope.</p> |

4 (Pages 13 to 16)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 17 | Page 18 |
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| <p>1 Q Did you speak with your brother regarding the 2021</p> <p>2 redistricting process in Washington state?</p> <p>3 A No.</p> <p>4 Q What do you know about your brother's work related</p> <p>5 to redistricting in Washington?</p> <p>6 A Only that he is the Republican side of</p> <p>7 redistricting.</p> <p>8 Q Do you know anything about what he does in the</p> <p>9 context of his job?</p> <p>10 A I mean, he's a -- What's it called? Ops manager or</p> <p>11 something like that at the capitol, or -- I forget what</p> <p>12 his title is, but I know he works there. And he gives us</p> <p>13 tours, and I think he runs errands for the senators, I</p> <p>14 think, stuff like that.</p> <p>15 Oh, he manages the office, where the offices go for</p> <p>16 the senators. He has to do with the Historic Society</p> <p>17 because I guess you can bring back and forth old stuff</p> <p>18 from years ago from the historic room and put it outside</p> <p>19 for people to see. I'm sorry. I mean, that's --</p> <p>20 Q No, don't be sorry at all.</p> <p>21 Is there anything specifically as it relates to</p> <p>22 redistricting that you know about --</p> <p>23 A Oh.</p> <p>24 Q -- the sort of job duties that your brother has?</p> <p>25 A No.</p> | <p>1 Q Do you know Jim Honeyford?</p> <p>2 A Jim?</p> <p>3 Q Yes.</p> <p>4 A Yeah, I -- Yes.</p> <p>5 Q How do you know him?</p> <p>6 A He was a senator from Yakima. Years ago we met at a</p> <p>7 coffee shop for discussing -- oh, I can't remember what.</p> <p>8 I met him at different meetings with the representatives</p> <p>9 and politicians there in Yakima, just off and on meetings,</p> <p>10 situations like that.</p> <p>11 Q And when you met with him was that in your personal</p> <p>12 capacity or in connection with some group that you're a</p> <p>13 part of?</p> <p>14 A Well, I'm part of -- was part of the Yakima/Morelia</p> <p>15 Sister City organization there in Yakima, and we'd go --</p> <p>16 (Court reporter request for clarification.)</p> <p>17 A Morelia, sister city.</p> <p>18 Q And could you spell that for Jeanne? She is, I</p> <p>19 think, certified only in English, and that sounds like it</p> <p>20 might be a Spanish word.</p> <p>21 A Morelia is the capitol of Michoacán, M-O-R-E-L-I-A.</p> <p>22 THE REPORTER: Thank you.</p> <p>23 Q Thanks, Mel.</p> <p>24 And you were explaining sort of what that group</p> <p>25 entails. Could you let me know?</p> |
| Page 19 | Page 20 |
| <p>1 A Well, we establish cultural connections, business</p> <p>2 connections with the capitol in Morelia, in Michoacán</p> <p>3 there, Morelia. The organization donated several fire</p> <p>4 engine trucks. We've donated wheelchairs. And me and my</p> <p>5 wife ended up going down there to Morelia to visit their</p> <p>6 facilities there.</p> <p>7 The mayor and council people have come to Yakima,</p> <p>8 and we toured them Yakima. We toured the capitol there,</p> <p>9 and Paul gave us a tour of the whole capitol. And for</p> <p>10 that occasion, since Paul is my brother, we mentioned that</p> <p>11 we were coming by, and they -- What's it called? The</p> <p>12 people that came over, the committee that came over were</p> <p>13 really impressed that the Mexican flag was at the same</p> <p>14 height as the American flag, and they were pretty</p> <p>15 impressed with that.</p> <p>16 You know, most of the times other flags are below</p> <p>17 the U.S., but this time they were equal there. They</p> <p>18 thought it was cool and took pictures of it and all, but</p> <p>19 anyway. But yeah, that's what we did.</p> <p>20 Q Okay. And so that was when you were meeting with</p> <p>21 Senator Honeyford, it was sort of about that, I guess sort</p> <p>22 of a sister city program?</p> <p>23 A Yeah. When we were there I went there, yeah, and</p> <p>24 just, you know, encouraged him to join our -- not join,</p> <p>25 but be aware of our meetings. And, of course, the</p> | <p>1 meetings that I went to with the other senators, I went</p> <p>2 there as an interested party, as a Republican, just kind</p> <p>3 of support.</p> <p>4 Q And did Senator Honeyford start coming to those</p> <p>5 meetings?</p> <p>6 A He was there at that meeting. Well, not to our</p> <p>7 Morelia Sister City meetings at all. I went there, you</p> <p>8 know, representing not only myself but the organization.</p> <p>9 Q Okay. Have you ever met with Senator Honeyford</p> <p>10 about anything else?</p> <p>11 A Nope.</p> <p>12 Q Have you ever discussed anything related to this</p> <p>13 lawsuit with Jim Honeyford?</p> <p>14 A Oh, not at all. I haven't talked to Jim in two</p> <p>15 years, three years. I don't know.</p> <p>16 Q Have you discussed -- Have you ever discussed</p> <p>17 redistricting with him?</p> <p>18 A No, not at all.</p> <p>19 Q Did you know that Senator Honeyford was retiring?</p> <p>20 A Yes.</p> <p>21 Q And how did you find that out?</p> <p>22 A I didn't know he was retiring. I know he retired.</p> <p>23 Q Okay. And when did you find out that he was</p> <p>24 retiring?</p> <p>25 A I knew he retired after he announced it.</p> |

5 (Pages 17 to 20)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 21 | Page 22 |
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| <p>1 Q Okay. So did you find out from the announcement?</p> <p>2 A That he had retired, yes.</p> <p>3 Q And what do you recall --</p> <p>4 A Not before.</p> <p>5 Q -- hearing about it?</p> <p>6 A I heard after, after he retired that he -- Senator</p> <p>7 Honeyford retired and -- Yeah.</p> <p>8 Q Okay. Do you know Nicki Torres?</p> <p>9 A Yes, I do.</p> <p>10 Q How do you know her?</p> <p>11 A Well, she lived in Pasco, and she was president of</p> <p>12 the Chamber. I forget what the title is, the Latino or</p> <p>13 Hispanic Chamber. And so I'd go to the meetings, and</p> <p>14 she'd be there. And we know her, as far as</p> <p>15 professionally, like the luncheons and the Hispanic</p> <p>16 Chamber meetings and stuff like that.</p> <p>17 Q And have you ever discussed anything related to</p> <p>18 redistricting with Nicki Torres?</p> <p>19 A Oh, no. I haven't talked to her since before COVID.</p> <p>20 Q How about this lawsuit then?</p> <p>21 A No.</p> <p>22 Q Are you aware of Nicki Torres's political</p> <p>23 affiliation?</p> <p>24 A No. No. Yeah.</p> <p>25 Q Did you have a thought there?</p> | <p>1 A No. No. It's just the fact that she was on the</p> <p>2 Chamber. I don't know what affiliation she was, whether</p> <p>3 she was Democrat or Republican, I guess, kind of thing,</p> <p>4 but yeah, no.</p> <p>5 Q Okay. I just want to jump back a bit. So we were</p> <p>6 talking about the sister cities program; and I wanted to</p> <p>7 sort of ask you, I guess it seems like you think that work</p> <p>8 is important since you're involved in it, and I just</p> <p>9 wanted to know why.</p> <p>10 A Which program?</p> <p>11 Q The sister cities program with Morelia.</p> <p>12 A Oh, okay. Yeah. What about it?</p> <p>13 Q I guess why do you think it's important, if you do?</p> <p>14 A Oh, just because I like their -- what would you call</p> <p>15 it -- their mission of establishing connections --</p> <p>16 business, cultural, educational connections between Sister</p> <p>17 City Morelia and Yakima. I think it's a great</p> <p>18 opportunity, and if we can help, you know, more power to</p> <p>19 the organization.</p> <p>20 Q Okay, Mel, I just want to ask you some questions now</p> <p>21 focusing in a bit on this case.</p> <p>22 How did you come to be involved in this case?</p> <p>23 A Well, the -- I got talking to Jim Troyer about</p> <p>24 possibly running for office, and then in the conversation</p> <p>25 mentioned that this redistricting issue had come up with</p> |
| Page 23 | Page 24 |
| <p>1 the redistricting being -- what's the right word --</p> <p>2 racially redrawn, and if I'd like to be a part of this. I</p> <p>3 guess you want to call it a lawsuit.</p> <p>4 And because I'm Republican and I thought that it's a</p> <p>5 legitimate position, I said yes.</p> <p>6 Q Okay. So a couple of questions about that. You</p> <p>7 said that the redistricting issue was sort of about the</p> <p>8 map being racially redrawn.</p> <p>9 What do you understand racially redrawn to mean?</p> <p>10 A Just that it was redrawn to the effect that it was</p> <p>11 redrawn based on the population of the Hispanic community.</p> <p>12 Q Okay. And how would you identify that as being</p> <p>13 connected to the redistricting issue that's at the center</p> <p>14 of this case?</p> <p>15 MR. STOKESBARY: Objection, calls for a</p> <p>16 legal conclusion.</p> <p>17 Q (By Ms. Leeper) You can answer, Mel.</p> <p>18 A I'm sorry. Let me hang up. I'm getting a call over</p> <p>19 here. Let me -- It's beeping here. It's a client.</p> <p>20 I'm sorry. Ask the question again.</p> <p>21 Q Yes. How would you see that issue of the map being</p> <p>22 racially -- Actually, let me break this question down into</p> <p>23 parts.</p> <p>24 When you say that the map was racially redrawn, who</p> <p>25 are you referring to doing that drawing?</p> | <p>1 A Oh, I don't know. Whoever the powers would be that</p> <p>2 redrew the district.</p> <p>3 Q Am I understanding you to say that the redistricting</p> <p>4 issue that you saw at the center of this case was the way</p> <p>5 that those lines had been drawn?</p> <p>6 A Right.</p> <p>7 Q Okay. So you said that sort of because you're</p> <p>8 Republican and you thought that it was a legitimate</p> <p>9 position, you decided to jump in.</p> <p>10 In your words how would you encapsulate that</p> <p>11 legitimate position?</p> <p>12 A Because it's assumed that Latinos vote Democrat, if</p> <p>13 you overweight the Latino community in that district,</p> <p>14 you're -- what's the right word -- loading the district in</p> <p>15 a Democrat position based on the fact that it's Latinos.</p> <p>16 And so anyways, that to me is kind of like a racial</p> <p>17 weighting.</p> <p>18 Q Okay. So I'll get back into later we might have a</p> <p>19 discussion about sort of how Latinos vote and things that</p> <p>20 might dig into a little bit more of your views on that</p> <p>21 issue, but for now I just want to go back to specifically</p> <p>22 talking about sort of the origins of coming into this</p> <p>23 lawsuit.</p> <p>24 You said that you spoke with I believe it was</p> <p>25 Jim Troyer about running for office; is that correct?</p> |

6 (Pages 21 to 24)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 25 | Page 26 |
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| <p>1 A Correct.</p> <p>2 Q And who is Jim Troyer?</p> <p>3 A I don't know exactly his position, but he's -- every</p> <p>4 now and then will call me to ask me for possible electable</p> <p>5 Hispanic candidates.</p> <p>6 Q Okay. And do you know if Mr. Troyer is an employee</p> <p>7 of the state Republican party?</p> <p>8 A I don't know if he's an employee of the party. I</p> <p>9 don't know.</p> <p>10 Q Is he to your understanding affiliated with the</p> <p>11 Republican party?</p> <p>12 A Oh, yes.</p> <p>13 Q And do you know if he's an elected official?</p> <p>14 A He is not an elected official as far as I know.</p> <p>15 Q How long have you been in contact with Mr. Troyer?</p> <p>16 A Oh, gosh. I don't know. It's been years. I want</p> <p>17 to say probably six years maybe, five, six years, maybe</p> <p>18 longer.</p> <p>19 Q Okay. And you --</p> <p>20 A He will call me every now and then. I'm sorry. Go</p> <p>21 ahead.</p> <p>22 Q No, please continue.</p> <p>23 A Yeah, he just calls me now and then, again to ask me</p> <p>24 for electable candidates.</p> <p>25 Q And can you remember any of the names of electable</p> | <p>1 candidates that you provided to him?</p> <p>2 A Saul Martinez would be one. Oh, gosh. I think in</p> <p>3 Sunnyside, I think -- I want to say his name is Almeida.</p> <p>4 Raul Almeida I think is his first name. Yeah, I don't</p> <p>5 remember. I'm trying to think of others.</p> <p>6 Angel Garza from Othello. Yeah.</p> <p>7 Q And when you've spoken with Mr. Troyer, has he been</p> <p>8 seeking electable candidates for any particular political</p> <p>9 offices?</p> <p>10 A No, no, just electable for -- to have in his book of</p> <p>11 reference, I guess, for positions that may be coming up in</p> <p>12 the different districts here in our area.</p> <p>13 Q And has he ever spoken to you about sort of</p> <p>14 specifically looking for electoral candidates who might be</p> <p>15 from the Hispanic community?</p> <p>16 A Yeah.</p> <p>17 Q And is that mainly what he's been asking? Those are</p> <p>18 the sorts of candidates that he has been talking to you</p> <p>19 about?</p> <p>20 A Ask the question again. You were kind of mumbled.</p> <p>21 Q Yeah. Has he mainly come to you to ask for Hispanic</p> <p>22 electable candidates?</p> <p>23 A Yes.</p> <p>24 Q Have you had any conversations about why those are</p> <p>25 the candidates he has been seeking?</p> |
| Page 27 | Page 28 |
| <p>1 A Probably more because I might have gotten in touch</p> <p>2 with him because I think Latinos should be more prominent</p> <p>3 in the political scene, and I think, you know, Latinos</p> <p>4 should be elected.</p> <p>5 Q Can I ask why?</p> <p>6 A Well, because we're a significant portion of the</p> <p>7 community here, and I think we should have more</p> <p>8 representation.</p> <p>9 Q And why is that representation important?</p> <p>10 A Well, because everybody needs representation in</p> <p>11 the -- in the offices.</p> <p>12 Q And having the representation for the Latino</p> <p>13 community of specifically Latinos in office, would you say</p> <p>14 that is important?</p> <p>15 A Well, yes.</p> <p>16 Q Why is having Latinos in office representing Latinos</p> <p>17 important in particular? Why would Latinos, if you think</p> <p>18 so, be well suited to that role?</p> <p>19 A Well, for one I think the Republican party values</p> <p>20 mirror our values, you know, as much.</p> <p>21 Q So do you think that Latinos are more likely to</p> <p>22 share values with other Latinos?</p> <p>23 A Yes.</p> <p>24 Q What are some of the main values that you would say</p> <p>25 Latinos have?</p> | <p>1 A In general we are pro life, pro normal marriage.</p> <p>2 Q And sort of what's the basis for your understanding</p> <p>3 of those issues as the issues of Latino voters?</p> <p>4 A Say again? What's the issue?</p> <p>5 Q What's the basis of your understanding or belief</p> <p>6 that those are the main issues that Latino voters care</p> <p>7 about?</p> <p>8 A Well, I mean, I wouldn't necessarily say that</p> <p>9 they're the main issues because Latinos are very business</p> <p>10 oriented, so -- and I think the Republican party mirrors</p> <p>11 the importance of businesses. And added to that, the fact</p> <p>12 that the values of Latinos are generally conservative.</p> <p>13 Q Okay. And just to be clear, I'm asking sort of the</p> <p>14 basis of your understanding. I'm talking sort of about if</p> <p>15 this is coming from surveys or if it's coming from</p> <p>16 conversations you've had, or from looking at data.</p> <p>17 So with that understanding, I'm going to ask again</p> <p>18 sort of what's the basis of your belief that those are</p> <p>19 important issues to the Latino community?</p> <p>20 A The most important factor is the fact that I'm</p> <p>21 Latino. I mean, I don't need surveys to understand my</p> <p>22 community. And most of us are Catholic or evangelical,</p> <p>23 and those are pretty important values that mirror pro</p> <p>24 life, you know, pro marriage.</p> <p>25 And so I don't necessarily base it on any surveys,</p> |

7 (Pages 25 to 28)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

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| <p style="text-align: right;">Page 29</p> <p>1 other than the fact that I've been Latino all my life, and</p> <p>2 most of my association has been with the Latino community.</p> <p>3 Church, I'm a devout churchgoer. Based on that.</p> <p>4 Q Okay. So sort of your lived experience and the</p> <p>5 religious values that you hold is the basis.</p> <p>6 Is that a good summation?</p> <p>7 A Yeah.</p> <p>8 Q Okay.</p> <p>9 A Yes. Sorry.</p> <p>10 Q Don't worry. Yeah is okay. As long as it's not a</p> <p>11 nod, yeah is perfectly fine. You don't -- I'm not going</p> <p>12 to police the formality of the affirmative.</p> <p>13 Okay. So I'm going to loop back a little bit and</p> <p>14 talk about your first becoming involved in this case. You</p> <p>15 said that it was originally brought up to you by</p> <p>16 Jim Troyer when you were just having a discussion with him</p> <p>17 about running for office; is that correct?</p> <p>18 A Correct.</p> <p>19 Q And what office were you discussing running for?</p> <p>20 A The -- Senator Jim's office.</p> <p>21 Q And would that be Legislative District 15?</p> <p>22 A Yes, but add to that the fact that running here in</p> <p>23 my 8th district, also.</p> <p>24 Q And what Legislative District are you in?</p> <p>25 A Eighth, as far as I know.</p> | <p style="text-align: right;">Page 30</p> <p>1 Q And when did that conversation happen with Jim</p> <p>2 Troyer?</p> <p>3 A Oh, jeez. Well, this conversation started I'm going</p> <p>4 to say probably last November as far as, you know, when it</p> <p>5 first came up.</p> <p>6 Q And is that the first time that you'd spoken with</p> <p>7 Mr. Troyer about running for office in LD 15?</p> <p>8 A No. In the past bunch of years the idea of running</p> <p>9 for office has been mentioned, you know, me and my wife</p> <p>10 and so on.</p> <p>11 Q And apart from discussions between you and your</p> <p>12 wife, who else has mentioned the idea of you running for</p> <p>13 office in LD 15?</p> <p>14 A I don't know that me and my wife discussed running</p> <p>15 for office in 15, just in general running for office in</p> <p>16 the past years, you know.</p> <p>17 I've always thought that she's very likeable and</p> <p>18 outgoing, and she's pretty well known in the community.</p> <p>19 So I've always thought she would be. She's never been</p> <p>20 receptive to the idea, anyway, but yeah.</p> <p>21 Q Well, outside of the specific district, is the</p> <p>22 office that you discussed running for, that you discussed</p> <p>23 your wife running for, has that pretty much always been a</p> <p>24 legislative office, or have there been other offices?</p> <p>25 A Any office, yeah.</p> |
| <p style="text-align: right;">Page 31</p> <p>1 Q Local office?</p> <p>2 A Just running in general. I'm sorry.</p> <p>3 Q Any particular offices that you guys have talked</p> <p>4 about?</p> <p>5 A No. No, just running for office.</p> <p>6 Actually, Sharon Brown, Senator Sharon Brown, you</p> <p>7 know, we -- Her and my wife kind of got to be not good</p> <p>8 friends but, you know, friends via Facebook and stuff.</p> <p>9 And years ago Senator Sharon suggested Gracie kind of --</p> <p>10 what's the word when you follow the person around at</p> <p>11 work -- shadow, I think.</p> <p>12 Yeah, but Gracie was never receptive to that. She</p> <p>13 said, "Mel, I don't want to run." Okay. So anyway.</p> <p>14 Q Okay. And Senator Sharon Brown, do you know what</p> <p>15 district she represents or represented?</p> <p>16 A I want to say the 8th, I think. We've lived in</p> <p>17 Pasco, Kennewick and Richland, so whatever district she</p> <p>18 was representing. We got to know her fairly well -- not</p> <p>19 fairly well, you know, just got to know her.</p> <p>20 Q Okay. And so you've mentioned Jim Troyer and</p> <p>21 Sharon Brown. Who else have you spoken with about you</p> <p>22 running for office?</p> <p>23 A Oh, friends at work. I mean, a couple of them are</p> <p>24 Democrats, and they've told me would never vote for me.</p> <p>25 We're good friends, but anyway.</p> | <p style="text-align: right;">Page 32</p> <p>1 Q I'm sure you appreciate the honesty.</p> <p>2 Have you ever spoken with your brother about running</p> <p>3 for office?</p> <p>4 A Yeah. I mean, I'm sure I have.</p> <p>5 Q Has he ever expressed to you any particular office</p> <p>6 that he thinks you'd be good to run for?</p> <p>7 A Oh, no, not as far as specifics, but he says, "Hey,</p> <p>8 Mel," -- You know, I've always felt a little not --</p> <p>9 underqualified, I guess, for running for senator or, you</p> <p>10 know, representative, and he goes, "Mel, you're probably</p> <p>11 overqualified."</p> <p>12 But anyways, just generally stuff like that.</p> <p>13 Q Okay. And so we've talked about it sort of in</p> <p>14 general terms, but I want to go back to the conversation</p> <p>15 that you had with Jim Troyer.</p> <p>16 What specifically did you discuss about running?</p> <p>17 And I think that conversation you said was LD 15.</p> <p>18 A Well, in our discussions I've always felt that</p> <p>19 Gracie, my wife, would make a better candidate. And so</p> <p>20 he's asking me for, you know, candidates and stuff.</p> <p>21 And he's always kind of suggested that I could run,</p> <p>22 and so in that conversation back in November, whenever it</p> <p>23 was, I go, "Well, how do you feel about myself?" And</p> <p>24 Gracie didn't want to. And he said, "I'm not calling you</p> <p>25 just because. I think that you would be a great</p> |

8 (Pages 29 to 32)

Soto Palmer, et al. v. Hobbs, et al.
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Ismael G. Campos

October 13, 2022

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| <p style="text-align: right;">Page 33</p> <p>1 candidate." So that was the gist of it all, I guess.</p> <p>2 Q And if you don't mind me asking, what is your wife's</p> <p>3 race?</p> <p>4 A My wife's what?</p> <p>5 Q Race.</p> <p>6 A Race? Mexican. I mean Latino or Hispanic.</p> <p>7 Jalapeño is pretty good, too.</p> <p>8 Q There's a lot of terms, I know. Yeah, I know. I</p> <p>9 prefer Latino, but my mom prefers Hispanic. It's like a</p> <p>10 very personal thing, I know.</p> <p>11 A Yes, either one. And, of course, I'm proud to be</p> <p>12 Mexican, so I'm definitely comfortable being called a</p> <p>13 Mexican.</p> <p>14 Q I love that.</p> <p>15 Okay. Did you suggest any other candidates to</p> <p>16 Jim Troyer for LD 15?</p> <p>17 A Yes. Angel Garza. I think I suggested -- I want to</p> <p>18 say his first name is Raul Almeida. I think Hector Garza</p> <p>19 from Wapato, if I remember.</p> <p>20 Oh, gosh. I might have suggested my brothers</p> <p>21 because they're down there in Yakima, but neither of them</p> <p>22 are interested in it. But that's all I can remember,</p> <p>23 really. I don't remember.</p> <p>24 Q Okay. And you said that you live in LD 8; correct?</p> <p>25 A I'm sorry?</p> | <p style="text-align: right;">Page 34</p> <p>1 Q You mentioned that you live in Legislative District</p> <p>2 8; is that correct?</p> <p>3 A Yes. Yes.</p> <p>4 Q And was that one of the reasons why you couldn't run</p> <p>5 in Legislative District 15?</p> <p>6 A Right. Yeah. And I looked into the possibility of</p> <p>7 moving over in time so that, you know, it wouldn't be an</p> <p>8 issue into the 15th District, by in the end because of</p> <p>9 my -- I inherited a ranch in Mexico, and so in the end we</p> <p>10 concluded that I was going to be spending the winters over</p> <p>11 there. And so that's when the legislature is in session,</p> <p>12 so I kind of thought well, maybe that's not such a good</p> <p>13 idea.</p> <p>14 Q Okay. And if the lines were to be redrawn at some</p> <p>15 point in time, in a decade or something like that, and you</p> <p>16 were to be placed in Legislative District 15 instead of</p> <p>17 Legislative District 8, do you think that that would lead</p> <p>18 to any sort of harm to you?</p> <p>19 A Well, if the Latino community is just generally</p> <p>20 thought to vote Democrat and I'm running as a Republican,</p> <p>21 then yeah. I mean, I would think that that would affect</p> <p>22 me.</p> <p>23 Q Okay. So that's the way it would affect you might</p> <p>24 be in the partisan lean of a particular district; is that</p> <p>25 correct?</p> |
| <p style="text-align: right;">Page 35</p> <p>1 A Correct. Yeah.</p> <p>2 Q And do you think that a district that might have</p> <p>3 sort of a larger quantity of Latinos in it might be less</p> <p>4 likely to elect a Republican?</p> <p>5 A Oh, I don't know. Again, I get back to the idea</p> <p>6 that Republicans are conservative. Most Hispanics are</p> <p>7 conservative, and I think that -- I quote President Reagan</p> <p>8 where he would say, "Most Latinos are Republican. They</p> <p>9 just aren't aware of it yet," so --</p> <p>10 So I think hopefully I would have the character and</p> <p>11 the ability to convince them that we are a conservative</p> <p>12 party.</p> <p>13 Q But so the potential harm that would come, though,</p> <p>14 would be because of the potential partisan differences in</p> <p>15 that district; is that correct?</p> <p>16 A Correct. Yeah.</p> <p>17 Q Have you ever spoken with Jim Troyer when you talked</p> <p>18 about running for Legislative District 15, did you talk</p> <p>19 about what running for that district might entail?</p> <p>20 A Oh, yes. Yeah.</p> <p>21 Q And what did that discussion include?</p> <p>22 A Well, my biggest concern was how much out-of-pocket</p> <p>23 money it would take, and he would say it just depends on</p> <p>24 if I can raise enough campaign funds to pay for the</p> <p>25 campaign, so --</p> | <p style="text-align: right;">Page 36</p> <p>1 Q Did you raise the --</p> <p>2 A Time. Time, also, as far as campaigning, in</p> <p>3 which -- Again, because of my personal commitment to spend</p> <p>4 more time at Grandpa's ranch, that might affect</p> <p>5 campaigning, raising campaign funds.</p> <p>6 Q And did you have any discussion about sort of how</p> <p>7 much money is typically needed to launch a campaign?</p> <p>8 A He -- Yeah. He said it could entail nothing, again</p> <p>9 because I would raise the funds for it. And there have</p> <p>10 been candidates that have put money out of their pockets,</p> <p>11 so --</p> <p>12 Q And whether it comes from your pocket or from a</p> <p>13 funder, you know, raising money, did he say sort of how</p> <p>14 much these things tend to cost?</p> <p>15 A I don't remember a specific amount.</p> <p>16 Q Do you recall like a ballpark?</p> <p>17 A Somehow a hundred thousand rings a bell, but again,</p> <p>18 I don't know.</p> <p>19 Q Okay. Besides fundraising, what else did you</p> <p>20 discuss that running for office might entail?</p> <p>21 A The time. The time, again. Also the fact that --</p> <p>22 Of course, I didn't care because I think I'm a pretty open</p> <p>23 book -- the fact that it could get -- what's the right</p> <p>24 word? Where the people dig up dirt and stuff like that,</p> <p>25 which that to me was a lesser concern, but yeah.</p> |

State:
Objection to
lines
36:12-18:
hearsay.
The out-of-
court
declarant is
James
Troyer, who
is not a
party-
opponent in
this case.

Pls response:
Not hearsay as
opposing party
statement

9 (Pages 33 to 36)

Soto Palmer, et al. v. Hobbs, et al.
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October 13, 2022

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| <p style="text-align: right;">Page 37</p> <p>1 Q Do you see the financial cost of campaigns as a</p> <p>2 barrier for people running for office?</p> <p>3 A Well, in my case -- Well, yeah. I mean, I think --</p> <p>4 I think if it takes out-of-pocket expense, then yeah, it</p> <p>5 could be a hindrance for people.</p> <p>6 Q Um-hmm. Do you think that that might be one factor</p> <p>7 that leads to less Latinos running for office?</p> <p>8 MR. STOKESBARY: Objection, calls for</p> <p>9 speculation.</p> <p>10 A Oh, I don't know.</p> <p>11 Q (By Ms. Leeper) Okay. Were you familiar --</p> <p>12 Actually, did you talk with your brother at all about the</p> <p>13 decision to become an intervenor in this case?</p> <p>14 A Yes. And he said, "If you're going to do that, we</p> <p>15 should probably not discuss anything from" -- you know,</p> <p>16 "about this."</p> <p>17 Q Outside of the content of redistricting, but just in</p> <p>18 general about the concept of being an intervenor, did your</p> <p>19 brother encourage you to be an intervenor in the case when</p> <p>20 you discussed it with him?</p> <p>21 A Oh, no, not at all. No.</p> <p>22 Q Did he express any kind of opinion about whether or</p> <p>23 not you should intervene in the case?</p> <p>24 A No, not at all.</p> <p>25 Q Did he discuss with you anything about the general</p> | <p style="text-align: right;">Page 38</p> <p>1 concept of what he thought about having intervenors in</p> <p>2 this case?</p> <p>3 A I don't think he even knew what an intervenor was,</p> <p>4 but he said if I was going to be involved in any -- he</p> <p>5 didn't say -- in any things to do with redistricting and</p> <p>6 that, because he does that, we probably shouldn't discuss</p> <p>7 anything about it.</p> <p>8 Q Okay. Why didn't you ultimately run for LD 15?</p> <p>9 A Why would I ultimately run?</p> <p>10 Q Why did you not ultimately run this cycle?</p> <p>11 A Oh, because of my commitments to my Grandpa's ranch,</p> <p>12 spending more time in Mexico. Especially during the</p> <p>13 session portion of it because again, I have been and would</p> <p>14 like to continue to spend the winters down there, which</p> <p>15 includes January, February, which is when Olympia is in</p> <p>16 session, so --</p> <p>17 Q Did you have any discussions with anyone about Nicki</p> <p>18 Torres running for LD 15?</p> <p>19 A No.</p> <p>20 Q Did Jim Troyer ever ask you about Nicki Torres?</p> <p>21 A Yes, he might have. And I think because one of</p> <p>22 the -- In our discussions as far as candidates, Nicki</p> <p>23 hadn't come up. And so I was surprised that when she did</p> <p>24 decide to run that she ran, because I didn't think she was</p> <p>25 a Republican; but I never really had gotten to know her</p> |
| <p style="text-align: right;">Page 39</p> <p>1 well enough to make that assumption, I guess is the right</p> <p>2 word.</p> <p>3 Q I guess why did you think that she wasn't a</p> <p>4 Republican?</p> <p>5 A Well, again, because most of the political -- and I</p> <p>6 shouldn't say political. The assumption that being</p> <p>7 involved in the Hispanic Chamber and the leanings towards</p> <p>8 the Chamber just seemed to be liberal.</p> <p>9 Q And is there -- Was there anything else that</p> <p>10 surprised you about Nicki Torres running?</p> <p>11 A No, just surprised that -- again, that it was on the</p> <p>12 Republican side, which, you know, I was pleasantly</p> <p>13 surprised. I mean, I'm glad. I mean, I think she's a</p> <p>14 great lady from what I know of her, and I think she'll</p> <p>15 make a great candidate.</p> <p>16 Q And did Jim Troyer tell you sort of how Nicki Torres</p> <p>17 came to run? He didn't get the name from you.</p> <p>18 Did he tell you anything about sort of how she had</p> <p>19 come into the mix?</p> <p>20 A No.</p> <p>21 Q Okay. Were you familiar with Drew Stokesbary prior</p> <p>22 to this case?</p> <p>23 A No. I gotta make sure that was his last name, but</p> <p>24 yes.</p> <p>25 Q Yeah.</p> | <p style="text-align: right;">Page 40</p> <p>1 A Not at all.</p> <p>2 Q How did you first come into contact with</p> <p>3 Mr. Stokesbary?</p> <p>4 A I think Drew called me because of being named as an</p> <p>5 intervenor.</p> <p>6 THE WITNESS: Am I correct, Drew?</p> <p>7 A I don't remember.</p> <p>8 Q Oh, so just for your purposes, so that you know that</p> <p>9 Drew is not being rude. For purposes of the deposition</p> <p>10 Drew can issue objections, but sort of can't --</p> <p>11 A Oh.</p> <p>12 Q -- enter the conversation. So he's not being rude.</p> <p>13 He's just respecting the platform we're in.</p> <p>14 MR. STOKESBARY: Thanks, Simone.</p> <p>15 A Okay. Sorry.</p> <p>16 Q (By Ms. Leeper) No problem.</p> <p>17 A Sorry.</p> <p>18 Q It's all very formal and silly sometimes. So I just</p> <p>19 thought I'd let you know.</p> <p>20 A Yeah.</p> <p>21 Q Okay.</p> <p>22 A I just -- I just don't remember how we came in</p> <p>23 contact.</p> <p>24 Q Okay. And do you recall how Mr. Stokesbary got your</p> <p>25 phone number? Did he tell you?</p> |

10 (Pages 37 to 40)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 41 | Page 42 |
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| <p>1 A I don't remember.</p> <p>2 Q Okay. And so to your knowledge did anyone refer</p> <p>3 Mr. Stokesbary to you?</p> <p>4 A I don't know how the process works. I don't</p> <p>5 remember.</p> <p>6 Q Okay. And other than the conversation that you've</p> <p>7 mentioned with Jim Troyer, did you have any discussions</p> <p>8 with anyone where they mentioned that they might refer you</p> <p>9 to be an intervenor in this case?</p> <p>10 A No.</p> <p>11 Q Okay. Have you ever discussed --</p> <p>12 A I don't recall. That I recall, I haven't talked to</p> <p>13 anybody about this, about anything.</p> <p>14 Q Okay. Have you ever discussed anything related to</p> <p>15 the Garcia v. Hobbs case with Mr. Stokesbary?</p> <p>16 MR. STOKESBARY: Objection, attorney-client</p> <p>17 privilege.</p> <p>18 Mel, I'm going to instruct you not to answer that</p> <p>19 question because it inquires about our communications with</p> <p>20 each other.</p> <p>21 THE WITNESS: Oh, okay.</p> <p>22 MS. LEEPER: We can go ahead and move on.</p> <p>23 Q (By Ms. Leeper) One clarifying question I just want</p> <p>24 to ask for purposes of the record. Jim Troyer, his full</p> <p>25 name is James Troyer; is that correct?</p> | <p>1 A I don't know. I'm assuming it could be. I just</p> <p>2 know him as Jim.</p> <p>3 Q But you just know him as Jim?</p> <p>4 A Yeah.</p> <p>5 Q Got it.</p> <p>6 Okay. Are you familiar with an individual named</p> <p>7 José Trevino?</p> <p>8 A I know he's the representative, I think, in Quincy.</p> <p>9 Q Okay.</p> <p>10 A I -- There's two others. There's two others that</p> <p>11 are involved in this; and one is a representative in</p> <p>12 Quincy, and the other is a resident in Yakima, I think. I</p> <p>13 didn't read the specifics of it.</p> <p>14 Q Okay. And the other individual, would that be</p> <p>15 Alex Ybarra?</p> <p>16 A Yeah, I think. I'm pretty sure, yes, that's the</p> <p>17 name.</p> <p>18 Q Do you personally know Mr. Trevino?</p> <p>19 A No.</p> <p>20 Q And how about --</p> <p>21 A Okay. He might have been at one of the previous</p> <p>22 Republican meetings, like in Yakima and, you know, in the</p> <p>23 years past. I haven't had any Republican meetings or</p> <p>24 dinners or anything like that since pre COVID.</p> <p>25 Q Okay. But you don't recall sort of having a</p> |
| Page 43 | Page 44 |
| <p>1 personal acquaintanceship with Mr. Trevino?</p> <p>2 A No.</p> <p>3 Q How about with Alex Ybarra?</p> <p>4 A No.</p> <p>5 Q Okay. So I'm going to ask if you know any of the</p> <p>6 plaintiffs in the lawsuit; and I'm going to assume that</p> <p>7 you don't know their names by heart, so I'll just go down</p> <p>8 the list and ask.</p> <p>9 Do you know Susan Soto Palmer?</p> <p>10 A No.</p> <p>11 Q How about Alberto Isaac Macias?</p> <p>12 A No.</p> <p>13 Q Faviola Lopez?</p> <p>14 A No.</p> <p>15 Q Caty Padilla?</p> <p>16 A No.</p> <p>17 Q Evangelina Aguilar? She goes by Benji.</p> <p>18 A No.</p> <p>19 Q Lizette Parra?</p> <p>20 A No.</p> <p>21 Q How about Heliodora Morfin?</p> <p>22 A I didn't hear the name, but it doesn't sound -- Say</p> <p>23 the name again. It doesn't --</p> <p>24 Q Heliodora Morfin.</p> <p>25 A No.</p> | <p>1 Q And have you heard of an organization called the</p> <p>2 Southcentral Coalition of People of Color for</p> <p>3 Redistricting?</p> <p>4 A No.</p> <p>5 Q Okay. Mel, I know this is a bit far in advance, but</p> <p>6 it's when our trial is scheduled, which is why I'm asking</p> <p>7 you this. Is there any reason that you can think of that</p> <p>8 you would be unavailable the weeks of May 1st and May 8h,</p> <p>9 2023?</p> <p>10 A Only if I got delayed at the ranch in Mexico, you</p> <p>11 know. As far as I know, we have been there May up to</p> <p>12 June, you know, some of our trips. So no, and I couldn't</p> <p>13 tell that far in advance, but I'm hoping that I can be</p> <p>14 back by March/April timeframe.</p> <p>15 Q Okay. But there's a potential that you might be at</p> <p>16 your -- was it grandfather's ranch in Mexico?</p> <p>17 A Yes.</p> <p>18 Q Okay. Now, I have some more questions for you, but</p> <p>19 I'm wondering if now might be a good time for a quick</p> <p>20 break.</p> <p>21 MS. LEEPER: Could we go off the record,</p> <p>22 Jeanne.</p> <p>23 (Discussion off the record.)</p> <p>24 (Break 10:29 a.m. to 10:42 a.m.)</p> <p>25 MS. LEEPER: Okay. Let's go back on the</p> |

11 (Pages 41 to 44)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 45 | Page 46 |
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| <p>1 record.</p> <p>2 Q (By Ms. Leeper) Okay. We are back on the record</p> <p>3 now, and so we're going to get back into it. I have a few</p> <p>4 more questions for you about sort of specific individuals.</p> <p>5 Do you know Benancio Garcia, III?</p> <p>6 A I didn't hear the first name, but I don't know.</p> <p>7 Q Okay. I'll say it one more time just to be sure,</p> <p>8 Benancio Garcia.</p> <p>9 A No.</p> <p>10 Q Okay. And do you know anything about the Garcia v.</p> <p>11 Hobbs case challenging Legislative District 15?</p> <p>12 A I don't know the names, but I'm assuming they're on</p> <p>13 the paperwork that Drew or paper -- whatever email that</p> <p>14 Drew sent me as far as the Complaint, or whatever it is.</p> <p>15 Q Okay. And that is, just to be clear, this case is</p> <p>16 the Soto Palmer v. Hobbs case. That's a separate case.</p> <p>17 That's Garcia v. Hobbs.</p> <p>18 A Oh.</p> <p>19 Q So are you familiar with that?</p> <p>20 A Not that I'm aware of, no. Again, I'm not --</p> <p>21 Q Okay.</p> <p>22 A -- a person that details that kind of -- or pays</p> <p>23 attention to the detail very much. So yeah, I don't know.</p> <p>24 Q Okay. And I will just ask it one more way that</p> <p>25 might, you know, sort of help shed some light without</p> | <p>1 using all the names.</p> <p>2 Are you familiar with a case that's separate from</p> <p>3 this case that is challenging Legislative District 15 as</p> <p>4 being a racial gerrymander?</p> <p>5 A I want to say in the conversations with I want to</p> <p>6 say Drew, something about a case in -- Oh, no, and it</p> <p>7 might have been in an email, this one here, where --</p> <p>8 MR. STOKESBARY: Hey, Mel -- Mel, I'm just</p> <p>9 going to jump in and say that I've got to instruct you not</p> <p>10 to talk about any conversations you've had with me or</p> <p>11 emails you've exchanged with me, --</p> <p>12 THE WITNESS: Oh.</p> <p>13 MR. STOKESBARY: -- on the basis of</p> <p>14 attorney-client privilege.</p> <p>15 THE WITNESS: Okay.</p> <p>16 Q (By Ms. Leeper) Yeah. And so basically I'm asking</p> <p>17 about the knowledge that you have, not about the specific</p> <p>18 content of any conversations you've had with your</p> <p>19 attorney, but sort of the knowledge that you do have</p> <p>20 about that case, which is challenging Legislative</p> <p>21 District 15 as a racial gerrymander.</p> <p>22 So what knowledge do you have about that?</p> <p>23 A About 15?</p> <p>24 Q About the case that is challenging that district as</p> <p>25 a racial gerrymander.</p> |
| Page 47 | Page 48 |
| <p>1 A Louisiana or Mississippi or something is challenging</p> <p>2 in court that may have an effect on this case, that maybe</p> <p>3 this case could be a midpoint, I guess is basically the</p> <p>4 gist of what I'm getting from that.</p> <p>5 Q Okay. And is that sort of about the challenging of</p> <p>6 Section 2 of the Voting Rights Act; is that right?</p> <p>7 A Again, I don't know the details. Sorry.</p> <p>8 Q Okay. And just again, not asking about the content</p> <p>9 of the conversation, but when have you talked with</p> <p>10 Mr. Stokesbary about that case?</p> <p>11 A Again, I don't know necessarily that it was Drew.</p> <p>12 Q Or one of your attorneys.</p> <p>13 A Yeah. Yeah. It was in the process of being asked</p> <p>14 whether I wanted to do this because in the end it may be</p> <p>15 not even come to fruition if that case is decided by the</p> <p>16 court, whatever court that is, whether it's the Supreme</p> <p>17 Court, or whatever.</p> <p>18 Q Okay. And was anyone else other than one of your</p> <p>19 attorneys present for that conversation?</p> <p>20 A Oh, no. No, I --</p> <p>21 Q Okay. And how many --</p> <p>22 A Again, I don't -- Yeah, I don't even know that --</p> <p>23 I can't remember who told me about that, honestly. I</p> <p>24 mean, I don't remember.</p> <p>25 Q Okay. All right. We're going to bring you back to</p> | <p>1 basics, Mel. We're going to talk a little bit about your</p> <p>2 educational and work background.</p> <p>3 Where did you go to high school?</p> <p>4 A White Swan High School, on the Reservation.</p> <p>5 Q And did you --</p> <p>6 A Yakama Reservation.</p> <p>7 Q Did you live in that area, you know, the whole time</p> <p>8 you were growing up?</p> <p>9 A Pretty much, yeah. I was born in '56 in Mexico. Dad</p> <p>10 brought us to Washington around about '58. I graduated</p> <p>11 from White Swan and then lived there until I was about 24,</p> <p>12 off and on, because I went to college in California for a</p> <p>13 while, came back.</p> <p>14 So yeah, that's where I was raised.</p> <p>15 Q Okay. I think that you just said this, but where</p> <p>16 did you go to college?</p> <p>17 A I went to college at Bethany Bible College in</p> <p>18 California for a year and a half. Oh, gosh. '79 and '80,</p> <p>19 I think. Sorry.</p> <p>20 Q Okay. And what did you study while you were in</p> <p>21 college?</p> <p>22 A Well, I was going to take the basics to end up with</p> <p>23 a counseling degree, but I ran out of money and had to</p> <p>24 come home with a tail between my legs. Sorry.</p> <p>25 Q I don't think there's anything to be -- have the</p> |

12 (Pages 45 to 48)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 49 | Page 50 |
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| <p>1 tail between your legs about that, nothing to be ashamed 2 of there. That's just life. 3 Do you have any other degrees? 4 A I have a technical degree from Columbia Basin 5 College that got me the job -- Well, I got the job working 6 out in Hanford, and through one of their programs they 7 paid for my schooling at CBC to become an AP Health 8 Physics. 9 Q That's great. And can you explain to me what that 10 position is that you were talking about working in there? 11 A Monitoring radiation, make sure that people don't 12 overexpose themselves and contamination doesn't leave the 13 area. Survey people, make sure they're clean, not 14 contaminated. Make sure the step-off end where they're 15 coming out of the radiological zone stays clean so that 16 contamination doesn't migrate out of there. 17 I'd also go into areas where the facilities were 18 closed down because of Chernobyl. The ramifications of 19 that accident shut a lot of the Hanford nuclear plants 20 down, and they hadn't been entered for years. And so I'd 21 go in there and survey -- with masks and everything, 22 survey it, make sure that what levels of protective 23 clothing to wear and whether respirators should be worn, 24 how long they can stay there, depending on the level of 25 radiation and that kind of thing.</p> | <p>1 And I'd write a survey. That survey would go on to 2 be implemented and to state times and protective clothing 3 to wear in that area. 4 Q And how long did you work in that industry? 5 A Oh, gosh. Well, my boy was born in 1990. That's 6 when I started working at the -- what was called WPPSS 7 back then, Energy Northwest these days. In 1990 started 8 as a laborer, went to school, and then went out to the 9 Hanford area. 10 '95, I think. I'm not sure of the date, the year. 11 But then I worked there until I retired in 2011, I think. 12 Q And so are you currently employed? 13 A I'm self-employed. I'm a financial advisor. 14 Q Okay. And is that in a business that you own, or 15 sort of what organization are you a financial advisor 16 with? 17 A Okay. I'm a financial advisor with Johnson Prentis 18 Investments, or an -- I forget exactly what the tier is, 19 but we are under the umbrella, I guess so to speak, of 20 Royal Alliance. 21 Q Okay. And when did you start that job? 22 A Well, this with Royal Alliance, I switched over from 23 LpL. Actually, I'm going to graduate here next week, so 24 90 -- 90 days ago. 25 Q Okay. Congratulations!</p> |
| Page 51 | Page 52 |
| <p>1 A Thank you. 2 Q Between sort of leaving and retiring from your 3 previous job -- and forgive me, with the nuclear industry 4 and the radioactive industry and things like that, in 2011 5 and when you started this job, what did you do in between 6 there? 7 A Well, I was unemployed for about six months. And I 8 shouldn't say unemployed -- retired for about six months. 9 And so my wife would come home expecting me to have dinner 10 and the dishes washed and clothing, so I thought no, I 11 need to go back and work on something. 12 So to become productive and stay awake and stay 13 alert I started working as a financial advisor. Back then 14 it was RBC, Royal Bank of Canada. And then two years 15 later, two or three years later I went to work with 16 Waddell & Reed. Waddell & Reed got bought out by LpL. I 17 don't -- didn't like the LpL system, so I moved over with 18 a partner that I've known for years. 19 Q Okay. So you mentioned earlier one group that 20 you're pretty active in. Are there any other community 21 groups or societies that you are a part of? 22 A No, other than, of course, my church. No. No, not 23 outside of that. 24 Q Okay. Have you ever worked for any political 25 campaigns?</p> | <p>1 A I don't know if you call it worked. I did volunteer 2 work for a phone bank years ago. 3 Q Okay. And what campaign was that for? 4 A I think I called for -- Again, this is years ago 5 that I did this. I want to say Doc Hastings, and the 6 candidate's name was Honeycutt, I think. Not Honeycutt -- 7 Was Honeycutt one of the representatives? He didn't get 8 elected, but I helped in his campaign. 9 I can't remember what his name was. I'm sorry. I 10 want to say Honeycutt, but that sounds like an official 11 that was elected, and it wasn't him. It was -- Oh, I 12 can't remember what his name was. I'm sorry. 13 Q Do you recall was that Rod Honeycutt? 14 A Was he elected? 15 Q He was running for Congress. I know that much. I'm 16 actually not sure whether or not he was elected. 17 A If he didn't get elected, I'm sorry, but he's the 18 one that I did phone calls for. 19 Q Okay. 20 A I just remember -- 21 Q Do you recall the office that the individual was 22 running for? 23 A Oh, gosh, no. I do remember -- and it probably 24 wasn't necessarily local because I remember the bus was 25 coming in from Spokane, ended up here in Tri-Cities pretty</p> |

13 (Pages 49 to 52)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 53 | Page 54 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 late, like 11:00 or 12:00. And so we were out there in 2 the dark at the Safeway parking lot just rah-rahing. 3 Q Okay. And you mentioned Doc Hastings. What was he 4 running for? 5 A Oh, the position he's always had, or -- Yeah. 6 Newhouse took his place, so I was campaigning for -- on 7 the phone bank calling, using the phone, supporting. 8 Q Okay. And other than those two that you've 9 mentioned, have you ever volunteered for any other 10 political campaigns, either national or state or local? 11 A No, although I do remember having posters, and I 12 might have helped in the phone bank for President Bush, 13 the second one. 14 Q Okay. I think we covered this earlier, but just to 15 be sure. Have you ever run for any elected office? 16 A No. 17 Q And have you ever spoken with Jim Honeyford about 18 running for elected office? 19 A No, not that I remember. I mean yeah, no. 20 Q Okay. So you mentioned earlier that you live in 21 Kennewick; correct? 22 A Correct. 23 Q How long have you lived in Kennewick? 24 A Oh, gosh. A year, two years. 25 Q Okay. And how long have you lived in Benton County</p> | <p>1 in general? 2 A Oh, gosh. I can't remember when I moved from Pasco 3 to Kennewick the first time. I want to say Benton County, 4 Benton, Franklin, Tri-Cities -- there's three of them 5 here, three cities; and Franklin I think is on the other 6 side of the river. 7 Don't quote me on this. I'm not sure. Maybe ten 8 years. 9 Q Okay. Have you lived in any other counties in 10 Southcentral Washington? 11 A I mean, my life or -- I mean, I was raised in 12 Yakima, so I lived in Yakima County. 13 Years ago when I was still single I was in 14 Moses Lake for a while. I think that might be Grant 15 County. I think that's -- Oh, no, Brewster. I was in 16 Brewster for about a year or two. I have no idea what 17 county Brewster is, so -- 18 Gee, I can't remember. I'm sorry. I'm 65. I've 19 lived in a few places. 20 Q There is no need to apologize. 21 Okay. So I just want to sort of put a definition 22 out there just for purposes of these questions. I'm going 23 to be asking about the region, and so what do you 24 understand me to mean when I say Southcentral Washington? 25 A I haven't really thought about it. I was kind of</p> |
| Page 55 | Page 56 |
| <p>1 thinking southeastern. 2 Southcentral I guess would probably be -- I guess I 3 hadn't thought about it. I've never really thought about 4 Southcentral. I always thought Eastern Washington and 5 Western Washington, and we're in the Southeast. 6 So I guess Southcentral might have been Ellensburg, 7 I guess. 8 Q Okay. So just so we're on the same page, for the 9 purposes of this deposition when I use the term 10 Southcentral Washington I mean it to encompass the Yakima 11 Valley and Pasco region, as well as Benton, Adams and 12 Grant Counties, as well as Franklin in the mix as well. 13 So do you understand that term now? 14 A Oh, definitely. So what's Southeastern? 15 Walla Walla I guess is over there. 16 Q You know, I can't know for sure. 17 A I'm sorry. 18 Q All I know is what I've got here and sort of the 19 terms we're going to use. I'm sure there's a million 20 different ways we could break down Washington and define 21 it out, -- 22 A Yeah. 23 Q -- but as long as we're on the same page. 24 A Yeah, I'm in Southcentral, I guess. 25 Q Okay. So what do you know about the demographics of</p> | <p>1 Southcentral Washington? 2 A Well, in general if I understand it correctly, we're 3 over 50 percent of the population, we being the 4 Latino/Hispanic community. 5 Q Okay. And do you know over 50 percent, is that the 6 closest approximation that you know? 7 A Yeah. I don't -- I don't know. I would say 8 average. I'm not -- I'm sure Sunnyside is -- Oh, gosh. 9 It's a higher percentage. 10 Pasco is I want to say 60, I think. I don't 11 remember, but -- 12 Q Okay. 13 A You know, I'm guessing it's over 50 percent, I would 14 think. I'm assuming. I don't know. 15 Q So I'm going to go through a pretty long list of 16 cities and counties and ask you what you know about the 17 demographics of each, and so let's get into that. 18 So do you know how much of the population in Yakima 19 County is Latino? 20 A No. Again, I would probably think maybe 40. I 21 would think. I think it's lower in Yakima proper area. I 22 would think -- I'm assuming. 23 MR. HUGHES: Simone, my apologies for 24 jumping in here, but could I just get a standing objection 25 for this line of questioning, lack of foundation?</p> |

14 (Pages 53 to 56)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 57 | Page 58 |
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| <p>1 MS. LEEPER: Got it.</p> <p>2 MR. HUGHES: Thanks so much.</p> <p>3 Q (By Ms. Leeper) Do you know how much of the</p> <p>4 population in Pasco is Latino?</p> <p>5 A I want to say again in Pasco maybe 60 percent. I'm</p> <p>6 not sure. I know it's pretty high. Sixty percent would</p> <p>7 be my guess.</p> <p>8 Q How about the City of Yakima?</p> <p>9 A I want to say I think it's -- I don't think it's</p> <p>10 that high, but I want to say it's 40 percent, maybe --</p> <p>11 maybe.</p> <p>12 Q How about Toppenish?</p> <p>13 A These are all guesses; right?</p> <p>14 Q Yeah. I guess my question is whether you know. So</p> <p>15 if you don't know the answer, you can tell me that as</p> <p>16 well; but if you have a sense of it, you can also tell me,</p> <p>17 "My sense is," and, you know, I'll know that you're not</p> <p>18 basing it on the census.</p> <p>19 A Okay. Let's start with that. I don't know, but I</p> <p>20 have a sense what it would be on these cities.</p> <p>21 Q Okay. And when you say you have a sense of it, what</p> <p>22 are you basing that on?</p> <p>23 A Well, the fact that I live here -- there. I mean,</p> <p>24 yeah.</p> <p>25 Q Okay. So do you know how much of the population in</p> | <p>1 Toppenish is Latino?</p> <p>2 A It's probably I would think around 50 percent or</p> <p>3 less maybe, maybe more. I grew up there, but, you know,</p> <p>4 I'm not aware of it. Again, I'm guessing.</p> <p>5 Q How about Mabton?</p> <p>6 A Mabton might be pretty high. I'm thinking -- and</p> <p>7 again, I don't know; but if I were to guess, I would say</p> <p>8 60.</p> <p>9 Q Okay. How about Sunnyside?</p> <p>10 A Sunnyside I understand is pretty high. Again, from</p> <p>11 my meetings with the community there, the sister city and</p> <p>12 meeting people there and stuff. It might be as high as 70</p> <p>13 I would think.</p> <p>14 Q What about Wapato?</p> <p>15 A It should be probably pretty high. Again, I would</p> <p>16 think 60 percent or higher, and then Wapato -- and</p> <p>17 Toppenish, actually being on the Reservation or near the</p> <p>18 Reservation, that might be higher as far as the non-white</p> <p>19 population.</p> <p>20 Q What about the Latino population of Benton County?</p> <p>21 A Oh, as a whole? Gosh. I don't think it's as high</p> <p>22 as Franklin, so I would think 40 or 50 percent. Again, I</p> <p>23 don't know, but I'm kind of guessing because there's a lot</p> <p>24 of us here, a lot of Latinos, Hispanics.</p> <p>25 Q So you mentioned Benton not quite as high as</p> |
| Page 59 | Page 60 |
| <p>1 Franklin. What's your understanding of how much of the</p> <p>2 population in Franklin is Latino?</p> <p>3 A I don't know, but we're talking that being such an</p> <p>4 agricultural side of the land here, it might be over 60.</p> <p>5 I mean, I'm thinking Othello and that whole area there,</p> <p>6 it's probably pretty high.</p> <p>7 Q All right. We've got two more.</p> <p>8 What do you know about the Latino population in</p> <p>9 Adams County?</p> <p>10 A Oh, okay. Where is Adams County? I don't remember.</p> <p>11 I don't know.</p> <p>12 Q If you don't know and you don't have any sense of</p> <p>13 it, that's okay.</p> <p>14 Okay. And then finally, what about Grant County?</p> <p>15 A Grant County is Moses Lake; is that correct? I</p> <p>16 don't know.</p> <p>17 Q Okay.</p> <p>18 A I'm guessing now where it is.</p> <p>19 I'm pretty aware again of Franklin because I lived</p> <p>20 in Pasco, and Benton because I lived here in Benton</p> <p>21 County. And, of course, Yakima because I have family</p> <p>22 there and grew up there and everything else; but outside</p> <p>23 of that, the boundaries I'm not too sure of.</p> <p>24 Q Okay. Do you know how much of the voting age</p> <p>25 population in Southcentral Washington is Latino?</p> | <p>1 A No.</p> <p>2 Q And how about the citizen voting age population?</p> <p>3 A No, I wouldn't venture to guess.</p> <p>4 Q Are you aware of whether the demographics in</p> <p>5 Southcentral Washington have shifted in the last decade?</p> <p>6 MR. STOKESBARY: Objection.</p> <p>7 A Well, I think --</p> <p>8 THE WITNESS: Okay. Sorry.</p> <p>9 Q (By Ms. Leeper) You can go ahead and answer.</p> <p>10 A It's shifted to the -- There would be more Latinos,</p> <p>11 Hispanics, Mexicans, however you want to phrase it, yeah.</p> <p>12 Q And what is your basis for that understanding that</p> <p>13 there's an increasing Latino population?</p> <p>14 A Oh, gee. The fact that I live here and the</p> <p>15 businesses that have sprung up, and I'm assuming probably</p> <p>16 articles I've read.</p> <p>17 You know, it's pretty prevalent, the fact that we've</p> <p>18 grown. Everything from people coming in from California,</p> <p>19 and of course the migrant workers here. I mean, we've got</p> <p>20 the apples and all the field work and, you know, farm</p> <p>21 labor required. It's a given.</p> <p>22 Q So I think you just touched on this, but I do want</p> <p>23 to ask it directly. Do you have a sense of what has led</p> <p>24 to the increase in Latino population?</p> <p>25 A Well, the labor work, employment that's necessary.</p> |

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response:
Foundation
exists based
on Campos'
personal
knowledge
explained at
60:12-21

15 (Pages 57 to 60)

Soto Palmer, et al. v. Hobbs, et al.
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Ismael G. Campos

October 13, 2022

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| <p style="text-align: right;">Page 61</p> <p>1 And, of course, California being so expensive, I'm aware</p> <p>2 of at least two people that have sold their properties in</p> <p>3 California -- Latinos, Hispanic, that sold their</p> <p>4 properties in California and moved over here.</p> <p>5 Q Okay. Do you agree that members of the Latino</p> <p>6 community have historically experienced discrimination in</p> <p>7 Southcentral Washington?</p> <p>8 MR. STOKESBARY: Objection as to form.</p> <p>9 Q (By Ms. Leeper) You can answer.</p> <p>10 A Okay. I don't know if you necessarily want to call</p> <p>11 it discrimination. I mean, as far as how are you trying</p> <p>12 to -- What would be an example, I mean?</p> <p>13 Q I guess I'll ask you how would you define</p> <p>14 discrimination?</p> <p>15 A Being denied something based on race. If we're</p> <p>16 looking at race discrimination, you know, Hispanics or</p> <p>17 whatever.</p> <p>18 Q So with your understanding of the meaning of</p> <p>19 discrimination, do you agree that members of the Latino</p> <p>20 community have historically faced discrimination in</p> <p>21 Southcentral Washington?</p> <p>22 MR. STOKESBARY: Objection as to form.</p> <p>23 Q (By Ms. Leeper) You can answer.</p> <p>24 A I don't -- I don't think so.</p> <p>25 My experience as far as discrimination goes in the</p> | <p style="text-align: right;">Page 62</p> <p>1 workforce here is I don't think it exists in the sense</p> <p>2 that we're not -- You know, we're not going to give you</p> <p>3 this job based on your race. Most of the time it was</p> <p>4 pretty acceptable.</p> <p>5 Q Would you define prejudice differently than you</p> <p>6 would define discrimination?</p> <p>7 A I don't know necessarily prejudice. I think</p> <p>8 profiling is a different -- would be a different word, and</p> <p>9 I do that myself. I mean, you know, just profile people</p> <p>10 based on the fact that, you know, they're Mexican and, you</p> <p>11 know, most likely Catholic. I mean, you know, that kind</p> <p>12 of -- I don't know if you want to call it prejudice, but</p> <p>13 yeah.</p> <p>14 Q What kind of profiling do you think that the Latino</p> <p>15 community in Southcentral Washington has faced?</p> <p>16 A Just that, that kind of -- Again, my experience in</p> <p>17 working in the farms, the farmers were great to us. You</p> <p>18 know, the non -- the white farmers. You know, I've got no</p> <p>19 complaints. I loved my -- my farmer bosses.</p> <p>20 And school, I think the biggest thing that I can</p> <p>21 remember from high school as far as discrimination, if you</p> <p>22 want to call it, was the fact that I would take my</p> <p>23 homemade these days they're called ricos -- we called them</p> <p>24 tacos -- you know, to school, and they'd make fun of us --</p> <p>25 you know, at school, kid stuff.</p> |
| <p style="text-align: right;">Page 63</p> <p>1 At work I don't think I was ever denied a position</p> <p>2 necessarily because of my race or anything like that. So</p> <p>3 I don't -- I don't see anything like that. I don't know.</p> <p>4 Q Okay. Just a few more questions. One is so you</p> <p>5 mentioned sort of just, you know, I guess bullying based</p> <p>6 on sort of race-based stuff at school.</p> <p>7 Did you experience teachers intervening to stop</p> <p>8 that?</p> <p>9 A Oh, jeez. I don't remember. I don't -- I don't</p> <p>10 remember.</p> <p>11 Q Okay. And you mentioned your farm owner bosses. In</p> <p>12 what capacity have you done that work?</p> <p>13 A I was a ranch hand, tractor driver, drive truck, you</p> <p>14 know, change the water lines in the morning before school,</p> <p>15 water lines after school. You know, hoed the beets and</p> <p>16 thinned the mint and just the regular farmwork for the</p> <p>17 farmer.</p> <p>18 Q Okay. And what age sort of did you do that kind of</p> <p>19 work?</p> <p>20 A Oh, gee. Probably since I was -- the day I was</p> <p>21 born, except -- of course, I was born in '56.</p> <p>22 I would say probably -- oh, gee, I remember Dad</p> <p>23 coming picking us up after school in 6th, 7th grade to go</p> <p>24 do hoe beets in the afternoon. And then, of course,</p> <p>25 through high school I'd again go change water lines for</p> | <p style="text-align: right;">Page 64</p> <p>1 the farmers in the mornings, and then after school I</p> <p>2 worked -- I worked for them. I was their ranch hand.</p> <p>3 Q Okay. And have you ever personally experienced any</p> <p>4 instances besides the one we sort of discussed at school</p> <p>5 of, I guess, sort of negative stereotyping or making fun,</p> <p>6 either in person or online, based on the fact that you are</p> <p>7 Mexican?</p> <p>8 A No. No, not from -- I mean, we kid ourselves, you</p> <p>9 know, but -- Yeah, no. Other than that, no, not from</p> <p>10 other people that were non-Latinos.</p> <p>11 Q Okay. Do you have any knowledge about the voting</p> <p>12 patterns of Latino voters in the state of Washington?</p> <p>13 A No.</p> <p>14 Q Do you have any knowledge about the voting patterns</p> <p>15 of Latino voters specifically in Southcentral Washington?</p> <p>16 A No.</p> <p>17 Q Do you have any knowledge about the voting patterns</p> <p>18 of white voters in Southcentral Washington?</p> <p>19 A Well, I'm kind of assuming because of the fact that</p> <p>20 Republicans, you know, tend to win here that that would be</p> <p>21 the pattern. I guess on the reverse, the other side --</p> <p>22 and I don't know the percentage of Latino/Hispanic voters,</p> <p>23 but I think that might make a difference. I mean, I don't</p> <p>24 know.</p> <p>25 Q Okay. So just to be clear, what you're saying is</p> |

16 (Pages 61 to 64)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

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| <p style="text-align: right;">Page 65</p> <p>1 that based on the results of the elections you see where</p> <p>2 Republicans tend to win and the white voters make up a</p> <p>3 majority, you are assuming that then the white voters are</p> <p>4 voting for Republicans; is that correct?</p> <p>5 A That's kind of the assumption, that Latinos are not</p> <p>6 necessarily voting. And again, I don't know their</p> <p>7 patterns, but the assumption is Latinos mostly vote</p> <p>8 Democrat and so, you know, that's what I would think.</p> <p>9 Q Okay. And you say the assumption is. Where have</p> <p>10 you heard that assumption, or where are you getting that</p> <p>11 assumption from?</p> <p>12 A Oh, when I was involved in the -- There's an</p> <p>13 organization that just popped up. I used to be a member</p> <p>14 of the -- oh, gosh, what is it? It's an acronym.</p> <p>15 National Hispanic Republican Conference or Mission, or</p> <p>16 something like that. And we would have --</p> <p>17 We would have booths. We would have booths at the</p> <p>18 park, the baseball park and stuff like that. And it was</p> <p>19 pretty noticeable that Latinos were not Democrats,</p> <p>20 everything from saying the party of the rich and that kind</p> <p>21 of thing. I mean, personal I guess you would call it</p> <p>22 experience, or whatever.</p> <p>23 Q Okay. So I think my question was a little bit</p> <p>24 different than what you answered there. So that's sort of</p> <p>25 your experience of meeting Latinos who might be</p> | <p style="text-align: right;">Page 66</p> <p>1 Republican.</p> <p>2 My question is about this overarching assumption</p> <p>3 that you've referred to that Latinos tend to vote</p> <p>4 Democrat, and so I guess my question is where are you</p> <p>5 getting that assumption from?</p> <p>6 A Oh, just regular TV media. And, of course, at those</p> <p>7 booths the interest or the -- I guess the non-interest in</p> <p>8 the comments from passersby, my own experience, the fact</p> <p>9 that for some reason it's assumed that the Republican is a</p> <p>10 party of the rich, so to speak.</p> <p>11 Q And so in conversations with Latinos at that booth</p> <p>12 they were saying that they thought that the Republican</p> <p>13 party was a party of the rich.</p> <p>14 Is that what you're saying?</p> <p>15 A Yeah, pretty much. I mean, yeah, just the fact that</p> <p>16 passers go -- and again, I don't know if they were</p> <p>17 Democrat or not, just their assumption that, you know,</p> <p>18 they have of the Republican party is probably the same</p> <p>19 assumption that I have of the Democratic party, so --</p> <p>20 Q Okay. Thank you for that clarification.</p> <p>21 Have you ever reviewed any election returns with</p> <p>22 voting patterns broken down by race for Washington state</p> <p>23 legislative races?</p> <p>24 A No.</p> <p>25 Q Have you ever reviewed any election returns with</p> |
| <p style="text-align: right;">Page 67</p> <p>1 voting patterns broken down by race for Washington state</p> <p>2 legislative races specifically in Southcentral Washington?</p> <p>3 A No.</p> <p>4 Q Have you reviewed or conducted any statistical</p> <p>5 analysis to determine the breakdown of votes by race for</p> <p>6 seats in the state legislature?</p> <p>7 A No.</p> <p>8 Q Have you studied any opinion polls focused on Latino</p> <p>9 voters in Southcentral Washington?</p> <p>10 A No.</p> <p>11 Q How about the state of Washington more broadly?</p> <p>12 A No.</p> <p>13 Q Do you know what the term racially polarized voting</p> <p>14 means?</p> <p>15 A No, but --</p> <p>16 MR. STOKESBARY: Objection.</p> <p>17 A Okay.</p> <p>18 Q (By Ms. Leeper) You can go ahead and answer.</p> <p>19 A Yeah, I don't. I'm kind of guessing because of the</p> <p>20 term, but -- you know, polarizing the races. I mean, I</p> <p>21 don't know.</p> <p>22 Q Okay. And do you have any knowledge about whether</p> <p>23 Latino voters and white voters prefer the same candidates</p> <p>24 or different candidates for state legislative races in</p> <p>25 Southcentral Washington?</p> | <p style="text-align: right;">Page 68</p> <p>1 A Okay. Repeat -- I mean, repeat the question. Kind</p> <p>2 of like --</p> <p>3 Q It's a long one. I'll go through it again one more</p> <p>4 time.</p> <p>5 Do you have any knowledge about whether Latino</p> <p>6 voters and white voters prefer the same candidates or</p> <p>7 different candidates for state legislative races in</p> <p>8 Southcentral Washington?</p> <p>9 A Again, I don't know. I don't quite understand the</p> <p>10 question. Can you ask me like if you're asking me the</p> <p>11 question? I'm sorry.</p> <p>12 Q Absolutely. No worries. I'll just go ahead and</p> <p>13 rephrase. It's a long one. There were a lot of</p> <p>14 prepositional phrases there.</p> <p>15 So I guess I'm basically asking specifically whether</p> <p>16 you have any knowledge specifically about the preferences</p> <p>17 of white and Latino voters when they're voting for state</p> <p>18 legislative races in Southcentral Washington.</p> <p>19 A Yeah, no, I don't have any knowledge of that. I</p> <p>20 think I want to understand the question, that if I'm</p> <p>21 voting for a candidate, --</p> <p>22 Q Um-hmm.</p> <p>23 A -- whether I care if he's white or not. Is that --</p> <p>24 Q Oh, not quite. So I think I'm not --</p> <p>25 I'm asking specifically about like as a group</p> |

17 (Pages 65 to 68)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 69 | Page 70 |
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| <p>1 whether white voters and the group Latino voters tend to</p> <p>2 in these state legislative races in Southcentral</p> <p>3 Washington vote for the same candidates or different</p> <p>4 candidates.</p> <p>5 A No, I don't have any knowledge of it, but I would</p> <p>6 assume that if there is a Hispanic who is having to vote</p> <p>7 between a Hispanic conservative and a white conservative,</p> <p>8 I'm kind of assuming because of the familiarity would vote</p> <p>9 for a Hispanic.</p> <p>10 Q Can you tell me a little bit more? Do you mean by</p> <p>11 the familiarity that a Hispanic voter might feel with a</p> <p>12 Hispanic candidate?</p> <p>13 A Oh, in the sense of the cultural, I would assume the</p> <p>14 relationship that a -- if I'm Mexican and he's Mexican and</p> <p>15 he's conservative, then there would be more connection, so</p> <p>16 to speak.</p> <p>17 You know, again, depending on the policies that the</p> <p>18 guy is campaigning on, all given the same, I would assume</p> <p>19 he'd probably vote Latino. I mean, I'm just kind of</p> <p>20 generalizing that.</p> <p>21 Q Okay. Thank you.</p> <p>22 So could you tell me what you know about the process</p> <p>23 of redistricting in general?</p> <p>24 A Oh, gosh. In general, every ten years they do the</p> <p>25 census, and depending on how much of the population</p> | <p>1 changed in a particular area, they might redistrict.</p> <p>2 That's basically about the extent of it all.</p> <p>3 Q Okay. And what do you know about the process of</p> <p>4 redistricting state legislative districts in the state of</p> <p>5 Washington?</p> <p>6 A The same thing, I would assume. If there's</p> <p>7 population changes, there might be movement of the</p> <p>8 district.</p> <p>9 Q Okay. And do you have any additional information</p> <p>10 that you know about the process of how that redistricting</p> <p>11 occurs?</p> <p>12 A No. I haven't really delved into that. I suppose I</p> <p>13 should have asked Paul, but never did.</p> <p>14 Q Mel, what do you know about the Federal Voting</p> <p>15 Rights Act?</p> <p>16 A Oh, gosh. Without a refresher I have no --</p> <p>17 MR. STOKESBARY: Objection as to form.</p> <p>18 Sorry, Mel. Objection as to form.</p> <p>19 Q (By Ms. Leeper) And you can go ahead and answer.</p> <p>20 A Yeah, without a refresher in what is it, civic law</p> <p>21 or whatever it's called, I don't -- I don't remember.</p> <p>22 Q Okay. You mentioned earlier that you currently live</p> <p>23 in Legislative District 8; is that right?</p> <p>24 A Correct.</p> <p>25 Q Do you feel any particular connection to Legislative</p> |
| Page 71 | Page 72 |
| <p>1 District 8?</p> <p>2 A Any particular what connection?</p> <p>3 Q Connection to that, the community of Legislative</p> <p>4 District 8.</p> <p>5 A No, other than the fact that with Senator Sharon we</p> <p>6 were pretty well acquainted with.</p> <p>7 In Benton County -- and I don't know if it's the</p> <p>8 same district, or -- Jerome Delvin was a good, you know,</p> <p>9 fairly good friend because of our intercommunity meetings</p> <p>10 and stuff.</p> <p>11 Oh, gosh. Years ago Shirley Hankins was pretty</p> <p>12 popular with us, and I want to say that was when I lived</p> <p>13 in Pasco, in Franklin County. Oh, gosh. That -- You</p> <p>14 know, other than that, the fact that I lived in those</p> <p>15 cities and towns, no particular connection.</p> <p>16 Q Okay. And you mentioned three, I think, different</p> <p>17 elected officials. Are any of those people still in</p> <p>18 office? And I can go through them one by one.</p> <p>19 A Well, Shirley --</p> <p>20 Q I think --</p> <p>21 A Yeah, Shirley Hankins isn't --</p> <p>22 Q -- I got their names.</p> <p>23 A -- isn't there anymore from what I -- Excuse me, but</p> <p>24 I don't even know if she's alive. She's pretty old.</p> <p>25 Jerome Delvin is -- I want to say is now a</p> | <p>1 commissioner, I think.</p> <p>2 Of course, I don't know if Sharon Brown is still</p> <p>3 there or not. We haven't talked to her in quite a while.</p> <p>4 She might still be a senator.</p> <p>5 Yeah. Who else did I mention?</p> <p>6 Q You also mentioned Sharon.</p> <p>7 A Yeah, Sharon Brown. Yeah. Yeah, I don't --</p> <p>8 Q I think --</p> <p>9 A -- know if she's -- Go ahead.</p> <p>10 Q No, please go ahead. I apologize.</p> <p>11 A Yeah, I don't know if she's running or is still a</p> <p>12 senator. I know she was thinking of running for judge,</p> <p>13 and she might have run for judge. I don't know if she got</p> <p>14 the judge position and was elected or if she is still a</p> <p>15 senator. I haven't kept up.</p> <p>16 Q What interest do you have in the boundaries of the</p> <p>17 current Legislative District 15?</p> <p>18 A Well, other than the fact that they might be</p> <p>19 racially redrawn, but the district is not that important.</p> <p>20 I mean, so long as it's fair and equitable, I mean.</p> <p>21 Q Okay. And I'm going to ask it again and ask about</p> <p>22 sort of your personal interest. So do you have any</p> <p>23 personal interest in boundaries of Legislative District</p> <p>24 15?</p> <p>25 A No, not personal, other than when I was thinking of</p> |

18 (Pages 69 to 72)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

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| <p style="text-align: right;">Page 73</p> <p>1 running; but other than that, yeah, no.</p> <p>2 Q Okay. As far as you know, is the current</p> <p>3 Legislative District 15 majority Latino by citizen voting</p> <p>4 age population?</p> <p>5 A Oh, I don't know. The -- Okay. The current one or</p> <p>6 the redrawn one? I guess actually I don't know of either,</p> <p>7 so --</p> <p>8 Q So I do want to be -- I'll just be clear in this</p> <p>9 point. When we talk about Legislative District 15 and the</p> <p>10 current version, I'm referring to the version that was</p> <p>11 approved by the legislature at the beginning of this year,</p> <p>12 2022, so just so you know how to understand that term.</p> <p>13 A (Nodded.)</p> <p>14 Q And so what is your understanding of the current</p> <p>15 partisan leaning of the Legislative District 15 that was</p> <p>16 approved at the beginning of 2022?</p> <p>17 A My understanding of this new district, of why I'm</p> <p>18 involved in this is that it was redrawn based on racial</p> <p>19 population, Latino, and so that's the extent of it.</p> <p>20 Q Okay. And do you have any understanding of the</p> <p>21 partisan lean of that district?</p> <p>22 A Well, that would be -- I mean, if I'm -- If I</p> <p>23 understand the question, it is now, supposedly because</p> <p>24 it's a majority Latino, would be leaning Democrat.</p> <p>25 Q Okay. Did you ever testify at any of the public</p> | <p style="text-align: right;">Page 74</p> <p>1 hearings that were held by the 2021 Washington</p> <p>2 Redistricting Commission?</p> <p>3 A No, I've never testified in anything.</p> <p>4 Q Did you ever submit any written testimony to the</p> <p>5 2021 Washington Redistricting Commission?</p> <p>6 A No.</p> <p>7 Q Why not? Why did you not submit either kind of</p> <p>8 testimony?</p> <p>9 A I really didn't have a part of this. And again,</p> <p>10 because as an intervenor, you know, I can do this.</p> <p>11 Q Were you aware that there were public hearings being</p> <p>12 held by the 2021 Washington Redistricting Commission?</p> <p>13 A Not that I'm aware of, no. There might have been a</p> <p>14 media reporting or something, but I didn't pay attention</p> <p>15 to that. I don't know.</p> <p>16 Q Okay. I'll go back one different way to see if we</p> <p>17 can get to it, so --</p> <p>18 A Okay.</p> <p>19 Q -- we'll give it a fresh try here. Does that work</p> <p>20 for you?</p> <p>21 A Sure. Go ahead.</p> <p>22 Q Okay. Putting aside the race of the candidates that</p> <p>23 are running, as far as you know do white voters as a group</p> <p>24 tend to vote for and prefer the same candidates as Latino</p> <p>25 voters as a group?</p> |
| <p style="text-align: right;">Page 75</p> <p>1 A Within their own party or, you know, policies, or</p> <p>2 however you phrase it, values.</p> <p>3 Q Yeah, so thanks for setting aside the party issue.</p> <p>4 We're really focusing on the group that matters that we're</p> <p>5 talking about is white voters and Latino voters, and we're</p> <p>6 talking across parties, just in general. When they sit</p> <p>7 down in a general election and vote, you know, in the</p> <p>8 ballot box.</p> <p>9 So again, putting aside the race of the candidates,</p> <p>10 as far as you know do white voters tend to prefer the same</p> <p>11 candidates or different candidates than Latino voters as a</p> <p>12 group do?</p> <p>13 A Again, I think I would say depending on their --</p> <p>14 more or less their values, not necessarily their race.</p> <p>15 So, you know, would I vote for a Hispanic liberal?</p> <p>16 Probably not. It goes against my values. I would</p> <p>17 assume -- I would hope -- that most races, most people</p> <p>18 would vote their values and not necessarily the race. So</p> <p>19 I'm not aware of anybody that doesn't do that.</p> <p>20 MS. LEEPER: Okay. And I just -- Could we</p> <p>21 go off the record for a quick moment?</p> <p>22 (Discussion off the record.)</p> <p>23 (Zoom technical difficulty, connection lost by Court</p> <p>Reporter.)</p> <p>24</p> <p>25 (Break 11:30 a.m. to 11:34 a.m.)</p> | <p style="text-align: right;">Page 76</p> <p>1</p> <p>2 MS. LEEPER: Okay. Thank you. Let's go</p> <p>3 back on the record.</p> <p>4 Q (By Ms. Leeper) Okay. Mel, I want us to take a look</p> <p>5 at just a few documents in this case. So procedure-wise</p> <p>6 what I'm going to do is I'm going to drop it into the chat</p> <p>7 box so that all the attorneys that are here have a chance</p> <p>8 to look at it, but I'm also going to be screen sharing the</p> <p>9 document.</p> <p>10 So if you just want to go ahead and look at the</p> <p>11 screen, you should be able to see it just fine. So</p> <p>12 everyone should have that first one.</p> <p>13 A Do I click on it, or what -- what happens?</p> <p>14 (Document displayed.)</p> <p>15 Q Well, can you see that okay?</p> <p>16 A Okay. Yeah, I see it.</p> <p>17 Q Okay. Great. Then let's go ahead and do this. All</p> <p>18 right. So I'm going to go ahead and just scroll down to</p> <p>19 give you a chance to look at the document, and you can get</p> <p>20 a sense of it.</p> <p>21 And if you do want to open it in your own browser</p> <p>22 and scroll at your own time, you should feel free to do</p> <p>23 that as well.</p> <p>24 A My phone clicked in again, but I'm plugged in.</p> <p>25 Q Okay. Mr. Campos, have you had a chance to review</p> |

19 (Pages 73 to 76)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 77 | Page 78 |
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| <p>1 that document?</p> <p>2 A Yes. Is that --</p> <p>3 Q And have you --</p> <p>4 A Is that --</p> <p>5 Q Have you --</p> <p>6 A Is that the one where -- I'm sorry. Is that the one</p> <p>7 that's relating to this? Yeah, I see it.</p> <p>8 Q Yeah. So I guess my question to you is have you</p> <p>9 seen this document before?</p> <p>10 A Yes. I'm thinking yes.</p> <p>11 Q And what do you understand it to be?</p> <p>12 A The response to the lawsuit of this issue.</p> <p>13 Q Okay. So I'm going to represent to you that this</p> <p>14 is, as you see in the caption here, Plaintiffs' First Set</p> <p>15 of Requests for Production to the Intervenor Defendants.</p> <p>16 That's you.</p> <p>17 When did you first see this document?</p> <p>18 A I don't remember.</p> <p>19 Q Do you have an estimate?</p> <p>20 A Well, since -- I'm assuming this is part of the two</p> <p>21 documents or whatever that -- I think there's two of them.</p> <p>22 It might be the same one. I don't know. The -- When</p> <p>23 they -- I became or selected to volunteer to be part of</p> <p>24 this lawsuit, that this was sent to me.</p> <p>25 Q Okay. Did you conduct any searches to find any</p> | <p>1 documents or communications in your possession that might</p> <p>2 be responsive to these requests?</p> <p>3 A Yes. This is where it's asking me for documents</p> <p>4 from the Redistricting Commission and documents -- Yeah.</p> <p>5 Yeah, I did a search for that.</p> <p>6 Q How did you conduct that search?</p> <p>7 A Memory.</p> <p>8 Q Did you use any search terms through -- to do that</p> <p>9 search?</p> <p>10 A No. Again, I'm not very tech savvy as far as</p> <p>11 computers go. So I just -- From memory, anybody from the</p> <p>12 commission that might have sent me something. It would</p> <p>13 have been my brother Paul, and I go, "Hey, Paul" -- I</p> <p>14 think I called him or texted him -- and said, "Have you</p> <p>15 ever sent me any documents? Because these people are</p> <p>16 requesting it."</p> <p>17 And he goes, "No, I have no documents. We never</p> <p>18 sent anything like that."</p> <p>19 Okay. And then when I was a part of that is when he</p> <p>20 mentioned, "We probably shouldn't discuss this anymore if</p> <p>21 you're a part of that." Okay.</p> <p>22 Q Okay. And did you search through any texts on your</p> <p>23 phone to find any communications that might be relevant?</p> <p>24 A Well, yeah. Yeah. With Jim, Paul. I think that's</p> <p>25 it. Other than that, there was no document or</p> |
| Page 79 | Page 80 |
| <p>1 communication, other than the request if I wanted to be a</p> <p>2 part of this.</p> <p>3 Q And you say you looked through your communications</p> <p>4 with Jim and Paul. How did you look through your text</p> <p>5 messages?</p> <p>6 A Just scrolling.</p> <p>7 Q Okay. And did you find any texts that you thought</p> <p>8 might be relevant?</p> <p>9 A No.</p> <p>10 Q How about your email, did you search through your</p> <p>11 email to find anything that might be relevant?</p> <p>12 A Yeah. Yeah. I mean, as far back as I could go, and</p> <p>13 up until whenever this issue came up, there was no --</p> <p>14 there was nothing there.</p> <p>15 Q Okay. And you say "whenever this issue came up."</p> <p>16 Did you search through when you became involved in</p> <p>17 the lawsuit?</p> <p>18 A Well, I probably went further than that, just</p> <p>19 because I -- Personal satisfaction. I want to say -- When</p> <p>20 did this come up? And I want to say that I went back to</p> <p>21 maybe -- oh, gosh, before January, February when we</p> <p>22 started talking about candidates with Jim and stuff like</p> <p>23 that, and I didn't find anything.</p> <p>24 Q Did you go back as far as January of 2021?</p> <p>25 A No. Well, I mean, maybe. I don't know. I just</p> | <p>1 went back as far as when any communications might have</p> <p>2 come up from this.</p> <p>3 Q But you didn't conduct any word searches; is that</p> <p>4 correct?</p> <p>5 A No.</p> <p>6 Q Did your attorneys provide you with any search terms</p> <p>7 that you should use to conduct this search?</p> <p>8 MR. STOKESBARY: I'm going to --</p> <p>9 Q (By Ms. Leeper) And I'm not asking what those terms</p> <p>10 are. I'm just asking if they were provided.</p> <p>11 MR. STOKESBARY: I'm still going to object</p> <p>12 on the basis of attorney-client privilege and instruct you</p> <p>13 not to answer that question, Mel.</p> <p>14 Q (By Ms. Leeper) Okay. Did you end up producing any</p> <p>15 documents or text messages to your counsel?</p> <p>16 A No.</p> <p>17 Q Okay. I'm going to exit out of this document.</p> <p>18 A Okay.</p> <p>19 Q I'm going to send another one. I think what might</p> <p>20 be easiest is if you can open the chat there, do you see</p> <p>21 where I sent it?</p> <p>22 A I didn't see anything. Something came up and went</p> <p>23 away.</p> <p>24 Q Okay. So at the bottom of your screen do you see</p> <p>25 where it says chat?</p> |

20 (Pages 77 to 80)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

Page 82

1 documents that would be responsive to these requests?
2 A No, I haven't found any documents for anything --
3 anybody.
4 Q When did you do the search that we were talking
5 about earlier where you looked through your text messages
6 and email?
7 A When it was first requested of me. I don't remember
8 the date. I'd have to go back to the emails.
9 Q Okay. Do you have a ballpark estimate? Would you
10 say that was in the first half of the year or after the
11 summer?
12 A Oh, gosh. It can't be too long ago. I want to say
13 two or three months ago, maybe.
14 Q Okay. I'm going to stop the share of this document.
15 You mentioned that you had texted with your brother
16 about whether or not you had any relevant communications
17 or texts with him.
18 Do you still have those text messages?
19 A I don't know. Maybe. Probably. I don't think I've
20 deleted anything of his. I can --
21 Q Okay.
22 A I'd have to go back and look to see if I do have it.
23 Q Okay. And what texting platform do you use to text?
24 Is that just your standard one on your phone, like
25 iMessage?

Page 84

1 I just want to make sure that's there.
2 Q Have you ever had any communications with Anton
3 Grose?
4 A I have no idea who that might be.
5 Q How about Evan Ridley?
6 A No.
7 Q Okay. I'm going to turn to just a few more
8 documents now.
9 (Document displayed.)
10 Q Can you see that?
11 A Yes.
12 Q All right. I'll scroll down, and I'm going to go
13 down again to the questions.
14 Okay. Have you had a chance to review the document?
15 A Yeah. I mean, it looks familiar. I haven't
16 reviewed it lately. I don't think this is -- Yeah.
17 Q So my question related to that, have you seen this
18 document before?
19 A It looks very familiar, yeah. I think I remember
20 those questions and answers.
21 Q Do you remember providing any answers to the
22 questions in this document?
23 A I remember agreeing to the answers. I think that's
24 the document, yeah.
25 O Okay. Mr. Campos, who is paying for your legal

Ismael G. Campos

October 13, 2022

| Page 85 | Page 86 |
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| <p>1 representation in this case?</p> <p>2 MR. STOKESBARY: Objection.</p> <p>3 Q (By Ms. Leeper) You can answer.</p> <p>4 A Okay. I don't know.</p> <p>5 Q Has anyone told you who is paying for the attorneys</p> <p>6 in this case?</p> <p>7 A Not that I recall. If they did, I didn't pay</p> <p>8 attention because it wasn't coming out of my pocket. So</p> <p>9 yeah, I guess it doesn't -- Yeah, I don't know.</p> <p>10 Q So to be clear, --</p> <p>11 A To my knowledge, --</p> <p>12 Q Excuse me. Sorry for talking over you for a moment.</p> <p>13 So just to be clear, are you paying for your legal</p> <p>14 representation in this case?</p> <p>15 A No.</p> <p>16 Q Okay. I'm going to bring up one more, maybe two</p> <p>17 more documents.</p> <p>18 (Document displayed.)</p> <p>19 Q I'll give you a chance to look at this.</p> <p>20 Mel, have you had a chance to review this?</p> <p>21 A Yeah. Again, it's the requests for information; is</p> <p>22 that right? I'm assuming.</p> <p>23 Q Yes. Do you remember seeing this document before?</p> <p>24 A Oh, I'm assuming it's in the documentation that I've</p> <p>25 been receiving for this process.</p> | <p>1 Q Do you remember when you first saw this document?</p> <p>2 A Oh, no, I -- I -- No.</p> <p>3 Q Did you provide any answers to the questions in this</p> <p>4 document?</p> <p>5 A I'm assuming it's the questions where do I concur or</p> <p>6 agree with them, and yeah. I mean, I agreed.</p> <p>7 Q Okay. I'm going to open one last document for you.</p> <p>8 (Document displayed.)</p> <p>9 MR. STOKESBARY: Hey, Simone, I just -- The</p> <p>10 documents so far have been numbered one, two, three, five,</p> <p>11 six. I'm just confirming that I didn't -- there wasn't a</p> <p>12 four shared on the screen that I didn't notice I hadn't</p> <p>13 downloaded.</p> <p>14 MS. LEEPER: There is no four.</p> <p>15 MR. STOKESBARY: Okay.</p> <p>16 MS. LEEPER: It's going to live in my</p> <p>17 computer forever.</p> <p>18 MR. STOKESBARY: Okay. Sorry to interrupt.</p> <p>19 MS. LEEPER: Thank you. And I'm not</p> <p>20 marking these as exhibits, so just so you know.</p> <p>21 MR. STOKESBARY: Okay. Thanks.</p> <p>22 Q (By Ms. Leeper) Okay. Mr. Campos, Mel, have you had</p> <p>23 an opportunity to review this document?</p> <p>24 A Yeah, I'm assuming again it's part of the process,</p> <p>25 and I think I remember responding either I agree or I have</p> |
| Page 87 | Page 88 |
| <p>1 nothing to add, or something like that to these responses.</p> <p>2 Q Okay. So I'm going to switch gears just for a quick</p> <p>3 second and ask you, you've talked about communications</p> <p>4 that you might have had over text or email with people,</p> <p>5 including Jim Troyer, about running or considering running</p> <p>6 in Legislative District 15; is that correct?</p> <p>7 A Right.</p> <p>8 Q And do you still have those emails about running or</p> <p>9 potentially thinking about running in Legislative District</p> <p>10 15?</p> <p>11 A I don't necessarily know that there's emails. I</p> <p>12 know that I talked with Jim about the possibility about</p> <p>13 it. You know, I'd have to go back and look.</p> <p>14 I was looking specifically for, you know, this issue</p> <p>15 as far as my communications with Jim. I wasn't looking</p> <p>16 for our normal requests for candidates and, you know,</p> <p>17 whether I was going to run or not or that kind of thing,</p> <p>18 reasons why I'm not running, stuff like that.</p> <p>19 Q Okay. And you said you're not sure if there's</p> <p>20 emails. Might there -- Do you know if there are text</p> <p>21 messages about that discussion?</p> <p>22 A Well, that's what I meant. I don't think I've ever</p> <p>23 emailed Jim that I remember. I meant the text messages.</p> <p>24 Q Okay. So you do have texts about that topic with</p> <p>25 Jim?</p> | <p>1 A No, I don't know that I do. I mean, what I'm saying</p> <p>2 is I looked for emails because of again, that request for</p> <p>3 whatever, a request for emails, you know, on this topic;</p> <p>4 and so I didn't find anything that I remember.</p> <p>5 And again, as far as the running for the position, I</p> <p>6 didn't think that was relevant to this, so I, you know,</p> <p>7 probably just scrolled right past.</p> <p>8 Q Got it. Okay.</p> <p>9 MS. LEEPER: Well, if we could go off the</p> <p>10 record and take maybe a five-minute break, coming back at</p> <p>11 12:05, does that work for everyone?</p> <p>12 MR. STOKESBARY: Yeah, that's fine with me.</p> <p>13 Mel, is that okay with you?</p> <p>14 THE WITNESS: Yeah. Yeah, I'm okay.</p> <p>15 MS. LEEPER: Okay. I'll see you all</p> <p>16 shortly.</p> <p>17 (Break 11:58 a.m. to 12:06 p.m.)</p> <p>18 MS. LEEPER: Okay. I think we're ready to</p> <p>19 go back on the record.</p> <p>20 Q (By Ms. Leeper) Just a few more questions for you,</p> <p>21 Mel, and then we --</p> <p>22 A Okay.</p> <p>23 Q -- will be wrapping up from my end of things.</p> <p>24 I just wanted to be clear about precisely what kind</p> <p>25 of a search you conducted for any responsive</p> |

22 (Pages 85 to 88)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

1 communications or documents for our requests.
2 So breaking it down into pieces, you mentioned that
3 for communications with your brother, Paul Campos, you had
4 texted or called him to ask whether or not there were any
5 relevant communications that you would have had; is that
6 correct?
7 A Yes.
8 Q And he responded that there were not any relevant
9 communications; is that right?
10 A Yeah.
11 Q Outside of that did you actually go through text
12 messages with your brother to look for those
13 communications?
14 A Yeah. That's why I called him and asked him, "Hey,
15 did we ever discuss this? Because I'm becoming part of
16 this." And so I mean, I went through and searched, didn't
17 find anything; but just to make sure I'm covering it
18 because it seemed pretty important, so I said, "Hey, Paul,
19 did we ever discuss this, or did you send me any paperwork
20 concerning this?" And he goes pretty much, "No, I don't
21 discuss, you know, the interworkings of my position," or
22 something along that line, but no. "And if you're going
23 to be a part of this, best that we not discuss that any
24 further." And I'm like, "Okay."
25 Q Okay. And when you say you searched through the

1 text messages, was that just your scroll search?
2 A Right. Yeah, as far back as I could go.
3 Q And you had said that you did not think that that
4 scroll search went back through, you know, the beginning
5 of 2021; correct?
6 A No, it was since I got involved with this. Maybe
7 before when -- Again, like with Jim, just to make sure
8 that, you know, I didn't know then this thing started, so
9 just go back further and make sure I'm covered for this
10 timeframe.
11 Q Okay. And you --
12 A That goes back to --
13 Q And talking about Jim, did you do the same scroll
14 search for your texts with Jim Troyer?
15 A Yeah.
16 Q And that was also going back to the beginning of
17 your involvement in this matter; is that correct?
18 A Yeah, probably even before just to, you know, my own
19 comfort level.
20 Q But not all the way back to January of 2021?
21 A I didn't think it was necessary, but yeah. As far
22 as I know, I didn't. There's not that many text messages.
23 It's not like we text messaged, you know, once a month or
24 whatever.
25 I mean, I scrolled, but even once a month is

1 probably too much for text messages between me and Paul
2 and -- you know, or me and Jim, so --
3 Q Okay.

4 MS. LEEPER: I think that's the end of the
5 questions that I have for you, Mel. Thank you for your
6 time today and for answering all of my questions.

7 I do want to before I give up my time sort of make
8 like a comment on the record, Drew, that I feel it's
9 pretty clear that Mel hasn't conducted a full search and a
10 thorough search responsive to our document requests and,
11 you know, Requests for Production, and so I was wondering
12 if you would commit on the record to working with him to
13 conduct that thorough and full search.

14 MR. STOKESBARY: I'm not sure I share your
15 contention, Simone. I mean, it sounds like he conducted a
16 search of his -- It sounds like he conducted more than
17 what was necessary.

18 It sounds like with respect to communications with
19 his brother Paul he did a search on his own, and then he
20 followed up with another conversation just to verify that
21 he wasn't missing something. So I'm not sure I share your
22 contention; but that said, we will be glad to make sure
23 that we have fully complied with any Requests for
24 Production.

25 MS. LEEPER: Yeah, I'll just follow up for

1 the record that I think it's pretty clear that the search
2 only went back to the beginning of this year, maybe a few
3 months prior, and the Requests for Production are for
4 communications throughout the entire period of
5 redistricting; and so that would require a more thorough
6 search, both of the text messages and also of the emails,
7 any other form of communication that Mel was using during
8 that time period.

9 That's it from us. I don't know, Andrew, if the
10 state has any questions.

11 Thank you again for your time, Mel.

12 THE WITNESS: You're welcome.

13 MR. HUGHES: Nothing from the state. Thank
14 you.

15 Nothing from the state. Thanks.

16 Thank you, Mr. Campos.

17 THE WITNESS: You're very welcome. Glad to
18 help.

19 MS. LEEPER: Thank you.

20 MR. STOKESBARY: Mel, I would like to ask
21 you just a couple of questions, if that's okay.

22 THE WITNESS: Definitely.

23 EXAMINATION

24 BY MR. STOKESBARY:

25 Q So just kind of three general questions a little --

Ismael G. Campos

October 13, 2022

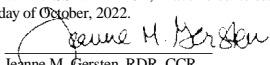

| Page 93 | Page 94 |
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| <p>1 they've got a few subparts.</p> <p>2 Earlier on Simone was asking you about, you know,</p> <p>3 you growing up in the area where you've lived, and you</p> <p>4 mentioned that you've lived in various parts of Central</p> <p>5 and Southeast Washington; do you remember that?</p> <p>6 A Yes.</p> <p>7 Q And you live in Kennewick now; correct?</p> <p>8 A Correct.</p> <p>9 Q And Kennewick is part of the Tri-Cities. Does it</p> <p>10 feel --</p> <p>11 A Yes.</p> <p>12 Q -- like the Tri-Cities are kind of a single</p> <p>13 community?</p> <p>14 A Well, definitely. You know, it's why they call it</p> <p>15 Tri-Cities, yes.</p> <p>16 Q What about Yakima, does it feel like Pasco or</p> <p>17 Kennewick or Richland is part of the same community as</p> <p>18 Yakima?</p> <p>19 A I don't think so, not as close as the Tri-Cities,</p> <p>20 although I mean, I have a strong relationship with again,</p> <p>21 the Yakima sister city. My family lives in Yakima. But</p> <p>22 no, they're pretty much separate communities.</p> <p>23 Q Okay. And what about the Yakama Reservation? You</p> <p>24 mentioned that you went to White Swan High School.</p> <p>25 Does the Tri-Cities, do they feel like they're part</p> | <p>1 of the same community as the Yakama Reservation?</p> <p>2 A Probably not. The Yakama Reservation, it has</p> <p>3 stronger ties with Yakima, the City of Yakima, and not so</p> <p>4 much with the Tri-Cities.</p> <p>5 Q Okay. Thanks, Mel. Moving on.</p> <p>6 This is always hard for me as the white guy, so I</p> <p>7 want to be respectful of the terms that you prefer, Mel.</p> <p>8 You identified yourself as Mexican.</p> <p>9 Fair to say that's a subset of Hispanic or Latino,</p> <p>10 so you would also consider yourself Hispanic or Latino;</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q And you said that you're also a Republican?</p> <p>14 A Correct.</p> <p>15 Q Do you know many other folks in your community that</p> <p>16 are Republicans who are also Hispanic or Latino?</p> <p>17 A Yes.</p> <p>18 Q So you mentioned a few times about, you know, this</p> <p>19 presumption perhaps in the media that Hispanics tend to be</p> <p>20 Democrats. In your own experience do you agree with that</p> <p>21 assumption?</p> <p>22 A Yeah. Yes. I'm sorry.</p> <p>23 Q Okay. Oh, I'm sorry?</p> <p>24 A Yes.</p> <p>25 Q Do you have any sense whether Hispanics or Latinos</p> |
| Page 95 | Page 96 |
| <p>1 in your area are becoming more Democrat overall or more</p> <p>2 Republican overall, or if it's kind of fixed?</p> <p>3 A I think the trend is switching to Republican.</p> <p>4 Conservative, I should say.</p> <p>5 Q Okay. And then a last little set of questions.</p> <p>6 Earlier in response to something Simone asked you talked</p> <p>7 about talking with Jim Troyer looking for Hispanic</p> <p>8 candidates for office, and you said that you want more</p> <p>9 Hispanics elected so there's more representation. I want</p> <p>10 to ask a followup question about that.</p> <p>11 If you're filling out your own ballot and there was</p> <p>12 two candidates that were on the ballot, one was a Latino</p> <p>13 or Hispanic who was a Democrat, and the other is a white</p> <p>14 non-Hispanic who was a Republican or conservative, without</p> <p>15 knowing anything else which of those two are you more</p> <p>16 likely to choose to vote for?</p> <p>17 A Definitely the conservative.</p> <p>18 Q Do you --</p> <p>19 MS. LEEPER: I'm sorry. Just really</p> <p>20 quickly -- Mel beat me to it -- I was unmuting to object</p> <p>21 to form.</p> <p>22 Q (By Mr. Stokesbary) And Mel, it's okay if you don't</p> <p>23 know this, but do you have any sense whether other folks</p> <p>24 in your area, you know, from your church or your family,</p> <p>25 your neighbors, do they engage in that same kind of</p> | <p>1 analysis as you do when it comes to those kinds of</p> <p>2 choices?</p> <p>3 MS. LEEPER: I'm going to object to form</p> <p>4 again.</p> <p>5 A Again -- Sorry.</p> <p>6 (Court reporter request to repeat answer.)</p> <p>7 A Oh, okay. So yeah, I would hope that they would</p> <p>8 vote their values.</p> <p>9 MR. STOKESBARY: Okay. That's all I have</p> <p>10 for you, Mel. Thanks so much.</p> <p>11 THE WITNESS: Thank you.</p> <p>12 MS. LEEPER: Okay. I think that is all. I</p> <p>13 think we can just hop off the record; is that right,</p> <p>14 Jeanne?</p> <p>15 (Discussion re reviewing transcript.)</p> <p>16 (Deposition concluded at 12:29 p.m.)</p> <p>17 (Signature reserved.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |

24 (Pages 93 to 96)

Soto Palmer, et al. v. Hobbs, et al.
 Lakeside Reporting (833) 365-3376

Ismael G. Campos

October 13, 2022

| Page 97 | Page 98 |
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| <p>1 CERTIFICATE</p> <p>2 STATE OF WASHINGTON)</p> <p>3) SS</p> <p>4 County of King)</p> <p>5 I, the undersigned Washington Certified Court</p> <p>6 Reporter, pursuant to RCW 5.28.010 authorized to</p> <p>7 administer oaths and affirmations in and for the State of</p> <p>8 Washington, do hereby certify:</p> <p>9 That the annexed and foregoing deposition of the</p> <p>10 witness named herein was taken stenographically before me</p> <p>11 and reduced to typewritten form under my direction.</p> <p>12 I further certify that the witness examined will be</p> <p>13 given an opportunity to review and sign their deposition</p> <p>14 after the same is transcribed, unless indicated in the</p> <p>15 record that the parties and witness waived the signing.</p> <p>16 I further certify that all objections made at the</p> <p>17 time of said examination to my qualifications or the</p> <p>18 manner of taking the deposition or to the conduct of any</p> <p>19 party have been noted by me upon the deposition.</p> <p>20 I further certify that I am not a relative or an</p> <p>21 employee or attorney or counsel of any of the parties to</p> <p>22 said action, or a relative or employee of any such</p> <p>23 attorney or counsel, and that I am not financially</p> <p>24 interested in the said action or the outcome thereof.</p> <p>25 I further certify that the witness before examination</p> <p>was by me duly sworn to testify the truth, the whole</p> <p>truth, and nothing but the truth.</p> <p>I further certify that the deposition, as</p> <p>transcribed, is a full, true and correct transcript of the</p> <p>testimony, including questions and answers and all</p> <p>objections, motions and exceptions of counsel made and</p> <p>taken at the time of the foregoing examination and was</p> <p>prepared pursuant to Washington Administrative Code</p> <p>308-14-135, the transcript preparation format guideline.</p> <p>IN WITNESS WHEREOF, I have hereunto set my hand and this</p> <p>23rd day of October, 2022.</p> <p></p> <p>Jeanne M. Gersten, RDR, CCR Registered Diplomat Reporter Washington CCR No. 2711 License effective until April 2, 2023 Residing at Seattle, Washington</p>  | <p>1 CHANGE/SIGNATURE SHEET</p> <p>2 I, the undersigned, ISMAEL G. CAMPOS, hereby</p> <p>3 certify that I have read the foregoing deposition and</p> <p>4 that, to the best of my knowledge, said deposition is true</p> <p>5 and accurate, with the exception of the following</p> <p>6 corrections listed below:</p> <p>7 PAGE LINE CHANGE REASON</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 Signature Date</p> <p>20 Witness: Ismael G. Campos</p> <p>21 Soto Palmer, et al. v. Hobbs, et al.</p> <p>22 USDC Western District of Washington</p> <p>23 Cause No. 3:22-cv-05035-RSL</p> <p>24 Date: October 13, 2022</p> <p>25 Reported by: Jeanne M. Gersten, RDR, CCR No. 2711</p> <p>LAKESIDE REPORTING</p> <p>(833) 365-3376</p> <p>Jeanne@LakesideReporting.com</p> <p>Contact@LakesideReporting.com</p> |

25 (Pages 97 to 98)

Soto Palmer, et al. v. Hobbs, et al.
Lakeside Reporting (833) 365-3376

| A | | | | |
|--------------------------|-------------------------|------------------------|-------------------------|------------------------|
| a.m 1:20 4:2 | 63:18 73:4 | 33:17 | appreciated | 86:24 |
| 44:24,24 75:24 | ago 17:18 18:6 | Angeles 2:19 | 15:12 | assumption 39:1 |
| 75:24 88:17 | 31:9 50:24 | ANNABELLE | apprehensive | 39:6 65:5,7,9 |
| ability 35:11 | 52:2,4 54:13 | 2:9 | 10:1 | 65:10,11 66:2 |
| able 6:7 15:10 | 71:11 82:12,13 | annexed 97:6 | approved 73:11 | 66:5,17,19 |
| 76:11 81:11 | agree 61:5,19 | announced | 73:16 | 94:21 |
| Absolutely | 86:6,25 94:20 | 20:25 | approximation | attention 45:23 |
| 68:12 | agreed 86:6 | announcement | 56:6 | 74:14 85:8 |
| acceptable 62:4 | agreeing 84:23 | 21:1 | April 97:23 | attorney 3:5 |
| accident 49:19 | agricultural | answer 5:10,17 | area 26:12 48:7 | 4:18 9:23 10:4 |
| accurate 9:12 | 59:4 | 6:5,7 7:1 9:3,6 | 49:13 50:3,9 | 10:11,12,13 |
| 98:3 | Aguilar 43:17 | 11:19,20 23:17 | 56:21 59:5 | 46:19 97:12,13 |
| acquaintances... | AHarless@Ca... | 41:18 57:15 | 70:1 93:3 95:1 | attorney-client |
| 43:1 | 2:13 | 60:9 61:9,23 | 95:24 | 41:16 46:14 |
| acquainted 71:6 | ahead 9:7 15:9 | 67:18 70:19 | areas 49:17 | 80:12 |
| acronym 65:14 | 15:11 25:21 | 80:13 85:3 | articles 60:16 | attorneys 3:4 |
| Act 47:6 70:15 | 41:22 60:9 | 96:6 | ASEEM 2:10 | 4:11,19 6:23 |
| action 97:12,13 | 67:18 68:12 | answered 65:24 | ashamed 49:1 | 10:20 47:12,19 |
| active 51:20 | 70:19 72:9,10 | answering 91:6 | aside 74:22 75:3 | 76:7 80:6 85:5 |
| Adams 2:4 | 74:21 76:10,17 | answers 5:18 | 75:9 | authorized 97:4 |
| 55:11 59:9,10 | 76:18 | 8:12,23 84:20 | asked 7:2 13:13 | Avenue 2:23 3:6 |
| add 9:5 29:22 | al 1:6 2:7 98:20 | 84:21,23 86:3 | 47:13 70:13 | average 56:8 |
| 87:1 | 98:20 | 97:16 | 89:14 95:6 | awake 51:12 |
| added 28:11 | Alberto 43:11 | Anton 84:2 | asking 9:22 12:7 | aware 19:25 |
| additional 9:2 | alert 51:13 | anybody 10:25 | 12:19 15:13 | 21:22 35:9 |
| 70:9 | Alex 1:14 42:15 | 41:13 75:19 | 26:17 28:13 | 45:20 58:4 |
| address 7:17 | 43:3 | 78:11 82:3 | 32:20 33:2 | 59:19 60:4 |
| administer 97:5 | alive 71:24 | anymore 71:23 | 44:6 46:16 | 61:1 74:11,13 |
| Administrative | Alliance 50:20 | 78:20 | 47:8 54:23 | 75:19 |
| 97:18 | 50:22 | anyway 19:19 | 68:10,15,25 | |
| advance 44:5,13 | Almeida 26:3,4 | 30:20 31:13,25 | 78:3 80:9,10 | B |
| advisor 50:13,15 | 33:18 | anyways 24:16 | 81:23 93:2 | B 3:17 |
| 50:17 51:13 | Amended 81:5 | 32:12 | Assistant 3:4 | back 17:17 22:5 |
| affect 34:21,23 | American 2:17 | AP 49:7 | association 29:2 | 24:18,21 29:13 |
| 36:4 | 19:14 | apart 30:11 | assume 6:6 43:6 | 32:14,22 35:5 |
| affiliated 25:10 | amount 36:15 | apologies 56:23 | 69:6,13,18 | 44:14,25 45:2 |
| affiliation 21:23 | AMulji@Cam... | apologize 54:20 | 70:6 75:17 | 45:3 47:25 |
| 22:2 | 2:13 | 72:10 | assumed 24:12 | 48:13 50:7 |
| affirmations | analysis 67:5 | APPEARAN... | 66:9 | 51:11,13 74:16 |
| 97:5 | 96:1 | 3:1 | assuming 14:15 | 76:3 79:12,20 |
| affirmative | Andrew 2:4 3:3 | apples 60:20 | 42:1 45:12 | 79:24 80:1 |
| 29:12 | 4:16 92:9 | application | 56:14,22 60:15 | 82:8,22 87:13 |
| afternoon 63:24 | Andrew.Hugh... | 83:10 | 64:19 65:3 | 88:10,19 90:2 |
| age 59:24 60:2 | 3:7 | appreciate 16:1 | 69:8 77:20 | 90:4,9,12,16 |
| | Angel 26:6 | 32:1 | 85:22,24 86:5 | 90:20 92:2 |

| | | | | |
|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| background 48:2 | 59:20 71:7 | broken 66:22 67:1 | 44:1 50:6 52:4 62:23,23 70:21 | case 4:12 14:11 14:13 16:3,5 |
| bad 16:13 | best 5:10 89:23 98:3 | brother 11:12 11:13,24 12:3 | 78:14 83:15 89:4,14 | 16:24 22:21,22 23:14 24:4 |
| ballot 75:8 95:11,12 | Bethany 48:17 better 32:19 | 13:18 16:19 17:1,24 19:10 | calling 32:24 53:7 | 29:14 37:3,13 37:19,23 38:2 |
| ballpark 36:16 82:9 | Bible 48:17 biggest 35:22 62:20 | 32:2 37:12,19 78:13 82:15 | calls 23:15 25:23 37:8 52:18 | 39:22 41:9,15 45:11,15,16,16 |
| bank 51:14 52:2 53:7,12 | bit 5:7,12 6:13 6:17 7:9 9:16 | 83:7,17 89:3 89:12 91:19 | campaign 2:8,11 35:24,25 36:5 | 46:2,3,6,20,24 47:2,3,10,15 |
| barrier 37:2 base 28:25 | 22:5,21 24:20 29:13 44:5 | brother's 17:4 brothers 33:20 | 36:7 52:3,8 campaigning 36:2,5 53:6 | 76:5 85:1,6,14 Catholic 28:22 62:11 |
| baseball 65:18 based 23:11 24:15 29:3 | 48:1 65:23 69:10 blue 15:19 | brought 29:15 48:10 Brown 31:6,6,14 31:21 72:2,7 | 69:18 campaigns 37:1 51:25 53:10 | Catly 43:15 Caucus 11:14,24 16:20 |
| 61:15 62:3,10 63:5 64:6 65:1 73:18 | book 26:10 36:23 booth 66:11 | browser 14:23 15:17 76:21 bullying 63:5 | Campos 1:13,18 3:12 4:4,10 7:5 7:7,7 11:11 | Cause 98:21 CBC 49:7 CCR 1:22 97:22 97:23 98:23 |
| basically 46:16 47:3 68:15 70:2 | booths 65:17,17 66:7 born 48:9 50:5 63:21,21 | bunch 30:8 bus 52:24 Bush 53:12 | 16:19 76:25 84:25 86:22 89:3 92:16 98:2,20 | census 57:18 69:25 center 2:8,11 23:13 24:4 |
| basics 48:1,22 Basin 49:4 | bosses 62:19 63:11 bottom 80:24 81:17 | business 19:1 22:16 28:9 50:14 businesses 28:11 60:15 | Canada 51:14 candidate 32:19 33:1 39:15 68:21 69:12 | Center.org 2:13 2:13 Central 93:4 certainly 83:7 certified 18:19 97:4 |
| basing 57:18,22 basis 28:2,5,14 28:18 29:5 | bought 51:16 boundaries 59:23 72:16,23 | button 15:19 | candidate's 52:6 candidates 25:5 25:24 26:1,8 | certify 97:5,7,9 97:11,14,15 98:2 challenging 45:11 46:3,20 46:24 47:1,5 |
| 46:13 60:12 80:12 beat 95:20 | box 75:8 76:7 boy 50:5 BPhillips@Ca... 2:14 | <hr/> C <hr/> C 2:1 97:1,1 C-A-M-P-O-S 7:8 | 26:14,18,22,25 32:20 33:15 36:10 38:22 67:23,24 68:6 | change 63:14,25 |
| becoming 29:14 89:15 95:1 | break 5:25 6:12 6:16,18 23:22 44:20,24 55:20 | calendar 15:3 California 2:19 48:12,18 60:18 61:1,3,4 | 68:7 69:3,4 74:22,24 75:9 75:11,11 79:22 87:16 95:8,12 | |
| beeping 23:19 beets 63:15,24 beginning 73:11 73:16 90:4,16 92:2 | breakdown 67:5 breaking 89:2 Brewster 54:15 54:16,17 | call 7:14,16 22:14 23:3,18 25:4,20 52:1 61:10 62:12,22 65:21 93:14 | capacity 1:9 18:12 63:12 capitol 17:11 18:21 19:2,8,9 caption 77:14 care 28:6 36:22 68:23 | |
| behalf 2:8,15,21 belief 28:5,18 believe 24:24 bell 36:17 BEN 2:10 | bring 17:17 47:25 85:16 broadly 67:11 broke 7:9 | called 14:6,7 17:10 19:11 33:12 40:4 | | |
| Benancio 45:5,8 Benji 43:17 Benton 53:25 54:3,4 55:11 58:20,25 59:20 | | | | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 98:5 CHANGE/SL... 98:1 changed 70:1 changes 70:7 character 35:10 chat 76:6 80:20 80:25 81:1 Chernobyl 49:18 choices 96:2 choose 95:16 church 29:3 51:22 95:24 churchgoer 29:3 cities 22:6,11 54:5 56:16 57:20 71:15 citizen 60:2 73:3 city 18:15,17 19:22 20:7 22:17 57:8 58:11 93:21 94:3 civic 70:20 clarification 6:4 9:3 12:18 18:16 66:20 clarify 9:6 clarifying 41:23 clean 49:13,15 cleaner 5:11 clear 5:17 9:21 28:13 45:15 64:25 73:8 85:10,13 88:24 91:9 92:1 click 76:13 81:2 81:10 clicked 76:24 client 23:19 close 15:9,11,13 93:19 closed 15:8 49:18 | closest 56:6 clothing 49:23 50:2 51:10 clouds 15:24 Coalition 44:2 Code 97:18 coffee 18:7 college 48:12,16 48:17,17,21 49:5 Color 44:2 Columbia 49:4 come 19:7 22:22 22:25 26:21 35:13 38:23 39:19 40:2 47:15 48:24 51:9 79:20 80:2 comes 36:12 96:1 comfort 90:19 comfortable 33:12 coming 15:10 19:11 20:4 24:22 26:11 28:15,15 49:15 52:25 60:18 63:23 85:8 88:10 comment 91:8 comments 66:8 commission 10:24 11:1 74:2,5,12 78:4 78:12 commissioner 72:1 commissioners 10:23 commit 91:12 commitment 36:3 commitments | 38:11 committee 19:12 communication 79:1 83:9 92:7 communicatio... 12:9,16 13:25 41:19 78:1,23 79:3 80:1 82:16 84:2 87:3,15 89:1,3 89:5,9,13 91:18 92:4 communities 93:22 community 23:11 24:13 26:15 27:7,13 28:19,22 29:2 30:18 34:19 51:20 56:4 58:11 61:6,20 62:15 71:3 93:13,17 94:1 94:15 Complaint 16:5 16:8 45:14 complaints 62:19 complete 8:23 9:12 Complex 3:5 complied 91:23 computer 15:24 86:17 computers 78:11 concept 37:18 38:1 concern 35:22 36:25 concerning 89:20 concluded 34:10 96:16 conclusion | 23:16 concur 86:5 conditions 8:17 conduct 77:25 78:6 80:3,7 81:25 91:13 97:10 conducted 67:4 88:25 91:9,15 91:16 Conference 65:15 confirming 86:11 Congratulatio... 50:25 Congress 52:15 connected 23:13 connection 18:12 69:15 70:25 71:2,3 71:15 75:23 connections 19:1,2 22:15 22:16 conservative 28:12 35:6,7 35:11 69:7,7 69:15 95:4,14 95:17 consider 94:10 considering 13:12 87:5 contact 25:15 40:2,23 Contact@Lak... 1:24 98:25 contaminated 49:14 contamination 49:12,16 content 9:22 37:17 46:18 47:8 contention | 91:15,22 context 8:22 13:2,7 17:9 continue 13:11 25:22 38:14 continued 2:25 3:1 conversation 4:22 12:14 22:24 30:1,3 32:14,17,22 40:12 41:6 47:9,19 91:20 conversations 9:22 26:24 28:16 46:5,10 46:18 66:11 convince 35:11 cool 19:18 copy 14:16 correct 16:21 24:25 25:1 29:17,18 33:24 34:2,25 35:1 35:15,16 40:6 41:25 53:21,22 59:15 65:4 70:24 80:4 81:12 87:6 89:6 90:5,17 93:7,8 94:11 94:12,14 97:16 corrections 98:4 correctly 56:2 cost 36:14 37:1 council 19:7 counsel 4:13 14:1 80:15 97:12,13,17 counseling 48:23 counties 54:9 55:12 56:16 county 53:25 54:3,12,15,17 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-------------------------|-------------------------|--------------------------|------------------------|-------------------------|
| 56:19 58:20 | decided 24:9 | 4:16,24 7:14 | 32:16 36:20 | 14:6,16,19 |
| 59:9,10,14,15 | 47:15 | 8:3,22 9:2,17 | 37:15,25 38:6 | 16:6,17 76:9 |
| 59:21 71:7,13 | decision 37:13 | 9:19,24 10:5 | 78:20 83:19 | 76:14,19 77:1 |
| 97:3 | DEFENDANT | 10:21 11:7 | 89:15,19,21,23 | 77:9,17 78:25 |
| couple 4:23 23:6 | 3:2 | 12:2 13:23 | discussed 12:12 | 80:17 81:4,15 |
| 31:23 92:21 | Defendants 1:11 | 14:1,4 15:8 | 16:10,23 20:12 | 81:18,21 82:14 |
| course 4:17 | 77:15 | 16:2,11,16 | 20:16,16 21:17 | 84:9,14,18,22 |
| 11:23 19:25 | Defense 2:17 | 40:9 55:9 | 30:14,22,22 | 84:24 85:18,23 |
| 33:11 36:22 | define 55:20 | 96:16 97:6,8 | 37:20 41:11,14 | 86:1,4,7,8,23 |
| 51:22 59:21 | 61:13 62:5,6 | 97:10,11,15 | 64:4 | 91:10 |
| 60:19 61:1 | definitely 33:12 | 98:2,3 | discussing 18:7 | documentation |
| 63:21,24 66:6 | 55:14 92:22 | depositions 6:23 | 29:19 | 12:8,19 85:24 |
| 72:2 | 93:14 95:17 | Deschutes 2:23 | discussion 4:3 | documents |
| court 1:4 18:16 | definition 54:21 | detail 45:23 | 24:19 29:16 | 10:16 14:3 |
| 47:2,16,16,17 | definitions | details 9:2 45:22 | 35:21 36:6 | 16:3 76:5 |
| 75:23 96:6 | 81:16 | 47:7 | 44:23 75:22 | 77:21 78:1,3,4 |
| 97:4 | degree 48:23 | determine 67:5 | 87:21 96:15 | 78:15,17 80:15 |
| covered 5:7 | 49:4 | devout 29:3 | discussions | 81:19,23 82:1 |
| 53:14 90:9 | degrees 49:3 | DEYLIN 2:17 | 13:18 30:11 | 82:2 84:8 |
| covering 89:17 | delayed 44:10 | difference 64:23 | 32:18 38:17,22 | 85:17 86:10 |
| COVID 21:19 | delete 83:25 | differences | 41:7 | 89:1 |
| 42:24 | deleted 82:20 | 35:14 | dishes 51:10 | doing 14:8 16:1 |
| cultural 19:1 | 83:16,22 | different 18:8 | displayed 76:14 | 23:25 |
| 22:16 69:13 | delved 70:12 | 26:12 55:20 | 84:9 85:18 | donated 19:3,4 |
| current 72:17 | Delvin 71:8,25 | 62:8,8 65:24 | 86:8 | double 81:2 |
| 73:2,5,10,14 | Democrat 22:3 | 67:24 68:7 | district 1:4,4 | downloaded |
| currently 50:12 | 24:12,15 34:20 | 69:3 71:16 | 12:11 13:7 | 86:13 |
| 70:22 | 65:8 66:4,17 | 74:16 75:11 | 24:2,13,14 | drawing 23:25 |
| cut 11:19 | 73:24 95:1,13 | differently 62:5 | 29:21,23,24 | drawn 24:5 |
| cycle 38:10 | Democratic | difficulty 75:23 | 30:21 31:15,17 | Drew 9:25 10:3 |
| | 66:19 | dig 24:20 36:24 | 34:1,5,8,16,17 | 10:4,7 12:20 |
| D | Democrats | dinner 51:9 | 34:24 35:2,15 | 14:5,24 16:6 |
| Dad 48:9 63:22 | 31:24 65:19 | dinnings 42:24 | 35:18,19 45:11 | 16:10 39:21 |
| dark 53:2 | 94:20 | Diplomate 1:23 | 46:3,21,24 | 40:4,6,9,10 |
| data 28:16 | demographics | 97:22 | 70:8,23 71:1,4 | 45:13,14 46:6 |
| date 50:10 82:8 | 55:25 56:17 | direction 97:7 | 71:8 72:17,19 | 47:11 91:8 |
| 98:18,22 | 60:4 | directly 60:23 | 72:23 73:3,9 | drink 6:12 |
| day 9:25 63:20 | denied 61:15 | dirt 36:24 | 73:15,17,21 | drive 63:13 |
| 97:20 | 63:1 | discrimination | 87:6,9 98:21 | driver 63:13 |
| days 50:7,24 | depending | 61:6,11,14,16 | districts 26:12 | drop 76:6 |
| 62:23 | 49:24 69:17,25 | 61:19,20,25 | 70:4 | DStokesbary... |
| DC 2:12 | 75:13 | 62:6,21 | dive 12:17 | 2:6 |
| decade 34:15 | depends 35:23 | discuss 10:20,23 | Division 3:5 | DThrift-Viver... |
| 60:5 | deposed 5:1 | 11:7 12:2,10 | Doc 52:5 53:3 | 2:20 |
| decide 38:24 | deposition 1:17 | 12:25 13:4 | document 14:5 | duly 97:14 |

| | | | | |
|--------------------------|--------------------------|-------------------------|-------------------------|-------------------------|
| duties 17:24 | 79:10,11 82:6 | 98:20 | F 97:1 | 63:17 |
| E | 83:10 87:4 | ethnicity 7:23 | Facebook 31:8 | farmers 62:17 |
| E 2:1,1 3:17 4:8 | emailed 87:23 | Evan 84:5 | 83:3 | 62:18 64:1 |
| 92:23 97:1,1 | emails 46:11 | evangelical | faced 61:20 | farms 62:17 |
| earlier 16:18 | 82:8 83:16,25 | 28:22 | 62:15 | farmwork 63:16 |
| 51:19 53:14,20 | 87:8,11,20 | Evangelina | facilities 19:6 | Faviola 43:13 |
| 70:22 82:5 | 88:2,3 92:6 | 43:17 | 49:17 | February 38:15 |
| 93:2 95:6 | employed 11:13 | everybody 27:10 | fact 13:12 16:18 | 79:21 |
| easier 4:25 5:6 | 11:24 50:12 | everyone's 4:25 | 22:1 24:15 | Federal 70:14 |
| 5:12 | employee 25:6,8 | exactly 25:3 | 28:11,20 29:1 | feel 32:23 69:11 |
| easiest 80:20 | 97:12,12 | 50:18 | 29:22 36:21,23 | 70:25 76:22 |
| 81:8 | employment | examination | 57:23 60:14,17 | 91:8 93:10,16 |
| Eastern 55:4 | 60:25 | 1:17 3:11 | 62:10,22 64:6 | 93:25 |
| Eddie@Morfi... | encapsulate | 97:10,14,17 | 64:19 66:8,15 | Fellow 2:10 |
| 2:24 | 24:10 | examined 97:7 | 71:5,14 72:18 | felt 32:8,18 |
| educational 2:17 | encompass | example 61:12 | factor 28:20 | field 60:20 |
| 22:16 48:2 | 55:10 | exception 98:3 | 37:6 | Fifteen 10:15 |
| EDUARDO | encourage 37:19 | exceptions 97:17 | fair 72:20 94:9 | 16:17 |
| 2:22 | encouraged | exchanged | fairly 31:18,19 | Fifth 3:6 |
| effect 23:10 47:2 | 19:24 | 46:11 83:17 | 71:9 | filed 16:3 |
| effective 97:23 | ended 19:5 | Excuse 71:23 | familiar 11:10 | filing 14:11,13 |
| EHerrera@M... | 52:25 | 85:12 | 37:11 39:21 | filling 95:11 |
| 2:19 | Energy 50:7 | exhibits 86:20 | 42:6 45:19 | finally 9:11 |
| Eighth 29:25 | engage 95:25 | exists 62:1 | 46:2 84:15,19 | 59:14 |
| either 33:11 | engine 19:4 | exit 80:17 | familiarity 69:8 | financial 37:1 |
| 53:10 64:6 | English 18:19 | expecting 51:9 | 69:11 | 50:13,15,17 |
| 73:6 74:7 | entail 35:19 36:8 | expense 37:4 | family 59:21 | 51:13 |
| 86:25 | 36:20 | expensive 61:1 | 93:21 95:24 | financially |
| elect 35:4 | entails 18:25 | experience 29:4 | far 9:25 12:11 | 97:13 |
| electable 25:4 | enter 40:12 | 61:25 62:16 | 13:13 14:5 | find 6:11 20:21 |
| 25:24,25 26:8 | entered 49:20 | 63:7 65:22,25 | 21:14 25:14 | 20:23 21:1 |
| 26:10,22 | entire 92:4 | 66:8 94:20 | 29:25 30:4 | 77:25 78:23 |
| elected 25:13,14 | enunciate 8:2 | experienced | 32:7 36:2 | 79:7,11,23 |
| 27:4 52:8,11 | equal 19:17 | 61:6 64:3 | 38:22 44:5,11 | 81:25 88:4 |
| 52:14,16,17 | equitable 72:20 | explain 6:5 16:7 | 44:13 45:14 | 89:17 |
| 53:15,18 71:17 | ERNEST 2:16 | 49:9 | 58:18 61:11,25 | fine 29:11 76:11 |
| 72:14 95:9 | errands 17:13 | explaining | 62:21 73:2 | 88:12 |
| election 66:21 | especially 4:25 | 18:24 | 74:23 75:10 | fire 19:3 |
| 66:25 75:7 | 38:12 | explains 14:7 | 78:10 79:12,24 | FIRM 2:21,22 |
| elections 65:1 | establish 19:1 | express 37:22 | 80:1 86:10 | first 26:4 29:14 |
| electoral 26:14 | establishing | expressed 32:5 | 87:15 88:5 | 30:5,6 33:18 |
| Ellensburg 55:6 | 22:15 | extent 70:2 | 90:2,21 | 40:2 45:6 54:3 |
| email 15:3,9,13 | estimate 77:19 | 73:19 | farm 60:20 | 76:12 77:14,17 |
| 45:13 46:7 | 82:9 | F | 63:11 | 82:7,10 86:1 |
| | et 1:6 2:7 98:20 | | farmer 62:19 | five 25:17 86:10 |

| | | | | |
|-----------------------------|-----------------------------------|----------------------------------|-------------------------------|-------------------------|
| five-minute 88:10 | friend 71:9 | gerrymander 46:4,21,25 | 6:10,25 8:3,5 | 38:11 |
| fixed 95:2 | friends 31:8,8 31:23,25 | Gersten 1:22 | 9:21 19:5 | Grant 54:14 |
| flag 19:13,14 | front 15:5 | 97:22 98:23 | 28:17 29:11,13 | 55:12 59:14,15 |
| flags 19:16 | fruition 47:15 | getting 23:18 | 30:3 34:10 | great 7:12,16 |
| Floor 2:18 | full 5:8,9,20 7:6 | 47:4 65:10 | 37:14 38:4 | 15:25 22:17 |
| fly 5:22,24 | 8:23 9:12 | 66:5 | 41:18 43:5,6 | 32:25 39:14,15 |
| flying 5:22 | 41:24 91:9,13 | gist 33:1 47:4 | 45:3 46:9 | 49:9 62:17 |
| focused 67:8 | 97:16 | give 6:17 8:11 | 47:25 48:1,22 | 76:17 81:14 |
| focusing 22:21 | fully 91:23 | 9:12 62:2 | 50:23 54:22 | grew 58:3 59:22 |
| 75:4 | fun 62:24 64:5 | 74:19 76:19 | 55:19 56:15 | Grose 84:3 |
| folks 94:15 | Fund 2:18 | 85:19 91:7 | 62:2 72:21 | ground 4:23 |
| 95:23 | funder 36:13 | given 60:21 | 76:6,6,8,18 | group 18:12,24 |
| follow 31:10 | fundraising 36:19 | 69:18 97:8 | 77:13 80:8,11 | 51:19 68:25 |
| 91:25 | funds 35:24 36:5 | gives 17:12 | 80:17,19 81:7 | 69:1 74:23,25 |
| followed 91:20 | 36:9 | glad 39:13 91:22 | 81:14,16 82:14 | 75:4,12 |
| following 98:3 | further 79:18 | 92:17 | 84:7,12 85:16 | groups 51:21 |
| follows 4:7 | 89:24 90:9 | go 4:23,24 6:12 | 86:7,16 87:2 | growing 48:8 |
| followup 95:10 | 97:7,9,11,14 | 9:6 15:9,11 | 87:17 89:22 | 93:3 |
| foregoing 97:6 | 97:15 | 16:14 17:15 | 90:16 96:3 | grown 60:18 |
| 97:17 98:2 | | 18:15 21:13 | Gonzalez 7:11 | guess 17:17 |
| forever 86:17 | G | 24:21 25:20 | good 4:10 7:15 | 19:21 22:3,7 |
| forget 12:8 | G 1:13,18 3:12 | 32:14,23 41:22 | 29:6 31:7,25 | 22:13 23:3 |
| 17:11 21:12 | 4:4 7:7,7,11 | 43:7 44:21,25 | 32:6 33:7 | 26:11 32:9 |
| 50:18 | 98:2,20 | 48:3,16 49:17 | 34:12 44:19 | 33:1 39:1,3 |
| forgive 51:3 | Garcia 41:15 | 49:21 50:1 | 71:8,9 | 47:3 50:19 |
| form 6:24 11:5 | 45:5,8,10,17 | 51:11 56:15 | gosh 25:16 26:2 | 55:2,2,6,7,15 |
| 11:18 61:8,22 | Garza 26:6 | 60:9 63:23,25 | 33:20 48:18 | 55:24 57:7,14 |
| 70:17,18 83:9 | 33:17,18 | 66:16 67:18 | 50:5 52:23 | 58:7 60:3 |
| 92:7 95:21 | gears 87:2 | 68:3,12 70:19 | 53:24 54:2 | 61:13 63:5 |
| 96:3 97:7 | gee 54:18 60:14 | 71:18 72:9,10 | 56:8 58:21 | 64:5,21 65:21 |
| formal 40:18 | 63:20,22 | 74:16,21 75:21 | 65:14 69:24 | 66:4,7 68:15 |
| formality 29:12 | general 3:4,5 | 76:2,10,17,18 | 70:16 71:11,13 | 73:6 77:8 85:9 |
| format 97:18 | 13:3 28:1 | 78:11,13 79:12 | 79:21 82:12 | guesses 57:13 |
| forth 17:17 | 30:15 31:2 | 79:24 82:8,22 | gotta 39:23 | guessing 56:13 |
| found 82:2 | 32:14 37:18,25 | 84:12 87:13 | gotten 27:1 | 58:4,23 59:18 |
| foundation 56:25 | 54:1 56:2 | 88:9,19 89:11 | 38:25 | 67:19 |
| four 86:12,14 | 69:23,24 75:6 | 90:2,9 | Gracie 31:9,12 | guideline 97:18 |
| Franklin 54:4,5 | 75:7 92:25 | God 16:13 | 32:19,24 | guy 69:18 94:6 |
| 55:12 58:22 | generalizing 69:20 | goes 32:10 43:17 | grade 63:23 | guys 12:22 |
| 59:1,2,19 | generally 28:12 | 61:25 75:16 | graduate 50:23 | 15:16 31:3 |
| 71:13 | 32:12 34:19 | 78:17 89:20 | graduated 48:10 | |
| free 76:22 | George 7:11 | 90:12 | Grande 7:18 | H |
| fresh 9:7 74:19 | | going 4:14,20,21 | grandfather's 44:16 | H 3:17 |
| | | 4:24 5:5,13 6:6 | Grandpa's 36:4 | half 48:18 82:10 |
| | | | | hand 63:13 64:2 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 97:19 Hanford 49:6,19 50:9 hang 23:18 Hankins 71:11 71:21 happen 9:1 30:1 happens 6:25 9:4 76:13 hard 94:6 HARLESS 2:9 harm 34:18 35:13 Hastings 52:5 53:3 head 5:16 Health 49:7 hear 43:22 45:6 heard 21:6 44:1 65:10 hearing 8:1 21:5 hearings 74:1,11 heart 43:7 Hector 33:18 height 19:14 held 74:1,12 Heliodora 43:21 43:24 help 22:18 45:25 92:18 helped 52:8 53:12 hereunto 97:19 HERRERA 2:16 Hey 12:10 32:7 46:8 78:13 86:9 89:14,18 high 48:3,4 57:6 57:10 58:6,10 58:12,15,21,25 59:6 62:21 63:25 93:24 higher 56:9 58:16,18 | hindrance 37:5 Hispanic 8:4,6 21:13,15 23:11 25:5 26:15,21 33:6,9 39:7 61:3 65:15 69:6,7,9,11,12 75:15 94:9,10 94:16 95:7,13 Hispanics 35:6 58:24 60:11 61:16 94:19,25 95:9 historic 17:16 17:18 historically 61:6 61:20 hit 15:15 Hobbs 1:9 41:15 45:11,16,17 98:20 hoe 63:24 hoed 63:15 hold 13:10 29:5 home 15:21 48:24 51:9 homemade 62:23 honestly 47:23 honesty 32:1 Honeycutt 52:6 52:6,7,10,13 Honeyford 18:1 19:21 20:4,9 20:13,19 21:7 53:17 hop 96:13 hope 75:17 96:7 hopefully 6:10 35:10 hoping 44:13 House 16:19 Hughes 3:3 4:16 56:23 57:2 92:13 | hundred 36:17 <hr/> I I-S-M-A-E-L 7:7 idea 30:8,12,20 34:13 35:5 54:16 84:4 identified 94:8 identify 8:6 23:12 III 45:5 iMessage 82:25 impact 13:19 impair 8:14,17 implemented 50:2 importance 28:11 important 22:8 22:13 27:9,14 27:17 28:19,20 28:23 72:19 89:18 impressed 19:13 19:15 inclination 5:15 include 35:21 includes 38:15 including 87:5 97:16 increase 60:24 increasing 60:13 INDEX 3:11 indicated 97:8 individual 11:10 42:6,14 52:21 individuals 45:4 industry 50:4 51:3,4 information 70:9 85:21 inherited 34:9 initial 7:10 inquires 41:19 | instances 64:4 instruct 41:18 46:9 80:12 instructions 81:16 interchangeably 8:4 intercommunity 71:9 interest 66:7 72:16,22,23 interested 20:2 33:22 97:13 interrupt 86:18 intervene 37:23 intervening 63:7 intervenor 14:8 16:7 37:13,18 37:19 38:3 40:5 41:9 74:10 77:15 Intervenor-De... 1:15 2:3 intervenors 38:1 interworkings 89:21 introduce 4:12 Investments 50:18 involved 22:8,22 29:14 38:4 39:7 42:11 65:12 73:18 79:16 90:6 involvement 90:17 iPhone 81:6 Isaac 43:11 Ismael 1:13,18 3:12 4:4 7:7 98:2,20 issue 12:16 22:25 23:7,13 23:21 24:4,21 28:4 34:8 | 40:10 75:3 77:12 79:13,15 87:14 issues 28:3,3,6,9 28:19 <hr/> J Jalapeño 33:7 James 41:25 January 38:15 79:21,24 90:20 Jeanne 1:22 18:18 44:22 96:14 97:22 98:23 Jeanne's 4:25 5:5,12 Jeanne@Lake... 1:24 98:24 jeez 30:3 63:9 Jerome 71:8,25 Jim 18:1,2 20:13 20:14 22:23 24:25 25:2 29:16 30:1 31:20 32:15 33:16 35:17 38:20 39:16 41:7,24 42:2,3 53:17 78:24 79:4,22 83:11 83:17 87:5,12 87:15,23,25 90:7,13,14 91:2 95:7 Jim's 29:20 job 17:9,24 49:5 49:5 50:21 51:3,5 62:3 Johnson 50:17 join 19:24,24 JOSE 1:13 José 42:7 judge 72:12,13 72:14 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|---------------------------------------|---------------------------------|----------------------------------------------|----------------------------------------------------|-----------------------------------------------------|
| jump 22:5 24:9 46:9 | 25:3,6,8,9,13 25:14,16 27:3 | 79:25 81:21 82:19 83:14 | 64:12,15 67:8 67:23 68:5,17 | 80:9,14 85:3 86:14,16,19,22 |
| jumping 11:22 56:24 | 27:20 28:24 29:25 30:4,9 | 85:4,9 86:20 87:11,12,13,14 | 69:1,19 73:3 73:19,24 74:24 | 88:9,15,18,20 91:4,25 92:19 |
| June 44:12 | 30:14,16 31:7 31:8,14,18,19 | 87:16,20 88:1 88:3,6 89:21 | 75:5,11 94:9 94:10,16 95:12 | 95:19 96:3,12 legal 2:8,10,11 |
| K | 31:19 32:8,10 32:20 33:8,8 | 90:4,8,8,18,22 90:23 91:2,11 | Latino/Hispanic 56:4 64:22 | 2:17 14:10,13 23:16 84:25 |
| Karl 3:4 4:14 | 33:10 34:7 35:5 36:13,18 | 92:9 93:2,14 94:15,18 95:23 | Latinos 24:12 24:15,19 27:2 | 85:13 legislative 13:7 |
| Karl.Smith@... 3:7 | 37:10,15 38:25 39:12,14 40:8 | 95:24 knowing 95:15 | 27:3,13,16,16 27:17,21,22,25 | 29:21,24 30:24 34:1,5,16,17 |
| keep 5:14,18,18 6:1 81:7 | 40:19 41:4 42:1,2,3,8,18 | knowledge 14:10 41:2 | 28:9,12 35:3,8 37:7 58:24 | 35:18 45:11 46:3,20 66:23 |
| Kennewick 2:23 7:18 31:17 | 42:22 43:5,7,9 44:5,11,11,12 | 46:17,19,22 64:11,14,17 | 60:10 61:3 65:5,7,19,25 | 67:2,24 68:7 68:18 69:2 |
| kept 72:15 | 45:5,6,10,12 45:23,25 47:7 | 67:22 68:5,16 68:19 69:5 | 66:3,11 94:25 launch 36:7 | 70:4,23,25 71:3 72:17,23 |
| kick 15:15,21 | 47:11,22 48:7 52:1,15 55:16 | 85:11 98:3 known 30:18 | law 2:21,22 70:20 | 73:3,9,15 87:6 87:9 |
| kid 62:25 64:8 | 55:16,18,25 56:5,6,7,13,14 | 51:18 | lawsuit 9:14 20:13 21:20 | legislators 11:8 legislature 34:11 |
| kind 16:7 20:2 22:3 24:16 | 56:16,18 57:3 57:6,14,15,17 | L | 23:3 24:23 43:6 77:12,24 | 67:6 73:11 legitimate 23:5 |
| 26:20 31:7,9 | 57:17,19,25 58:3,7,23 59:3 | labor 60:21,25 laborer 50:8 | 79:17 LD 30:7,13 | 24:8,11 legs 48:24 49:1 |
| 32:21 34:12 | 59:8,11,12,16 59:24 60:17,20 | lack 56:25 lady 39:14 | 32:17 33:16,24 38:8,18 | lesser 36:25 let's 44:25 56:17 |
| 37:22 45:22 | 61:10,16 62:2 62:7,9,10,11 | Lake 54:14 59:15 | lead 34:17 leads 37:7 | 57:19 76:2,17 81:7 |
| 49:25 54:25 | 62:11,12,18,18 62:24,25 63:3 | LAKESIDE 1:22 98:23 | lean 34:24 73:21 leaning 73:15,24 | letting 5:4 level 49:24 |
| 58:23 62:11,14 | 63:5,14,15 64:9,20,22,24 | land 59:4 larger 35:3 | leanings 39:7 leave 49:12 | 90:19 levels 49:22 |
| 62:16 63:18 | 65:6,8 66:16 66:17 67:13,20 | late 53:1 lately 84:16 | leaving 51:2 led 60:23 | liberal 39:8 75:15 |
| 64:19 65:5,20 | 67:21 68:9 69:17,22 70:3 | Latino 8:4,6 21:12 24:13 | Leeper 2:9 3:13 4:9,10 11:7,19 | License 97:23 life 4:25 5:6,12 |
| 67:19 68:1 | 70:10,14 71:7 71:8,14,24 | 27:12 28:3,6 28:19,21 29:1 | 23:17 37:11 40:16 41:22,23 | 28:1,24 29:1 49:2 54:11 |
| 69:8,19 74:7 | 72:2,9,11,12 72:13 73:2,5,6 | 29:2 33:6,9 34:19 56:19 | 44:21,25 45:2 46:16 57:1,3 | light 45:25 likeable 30:17 |
| 87:17 88:24 | 73:12 74:10,15 74:23 75:1,7 | 57:4 58:1,20 59:2,8,25 | 60:9 61:9,23 67:18 70:19 | line 4:19 6:19 56:25 89:22 |
| 92:25 93:12 | 75:10,15 77:22 | 60:13,24 61:5 61:19 62:14 | 75:20 76:2,4 | 98:5 |
| 95:2,25 | | | | |
| kinds 96:1 | | | | |
| King 97:3 | | | | |
| knew 20:25 38:3 | | | | |
| know 4:17 5:4 5:15 9:5 10:2 | | | | |
| 14:6 16:6,7,8 | | | | |
| 17:4,8,12,22 | | | | |
| 18:1,5,25 | | | | |
| 19:16,24 20:8 | | | | |
| 20:15,19,22,22 | | | | |
| 21:8,10,14 | | | | |
| 22:2,9,18 24:1 | | | | |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| lines 24:5 34:14 63:14,15,25 list 43:8 56:15 listed 98:4 Litigation 3:5 little 5:12 6:13 6:17 7:9 9:16 24:20 29:13 32:8 48:1 65:23 69:10 92:25 95:5 live 33:24 34:1 48:7 53:20 57:23 60:14 70:22 86:16 93:7 lived 21:11 29:4 31:16 48:11 53:23,25 54:9 54:12,19 59:19 59:20 71:12,14 93:3,4 lives 93:21 Lizette 43:19 LLC 2:4 loading 24:14 local 31:1 52:24 53:10 long 6:11 10:14 16:15 25:15 29:10 49:24 50:4 53:23,25 55:23 56:15 68:3,13 72:20 82:12 longer 25:18 look 76:4,8,10 76:19 79:4 82:22 85:19 87:13 89:12 looked 34:6 79:3 82:5 88:2 looking 26:14 28:16 61:16 87:14,15 95:7 | looks 84:15,19 loop 29:13 Lopez 43:13 Los 2:19 lost 75:23 lot 15:6 33:8 49:19 53:2 58:23,24 68:13 loud 5:19 Louisiana 47:1 love 33:14 loved 62:19 lower 56:21 LpL 50:23 51:16 51:17 luncheons 21:15 <hr/> M <hr/> M 1:22 4:8 92:23 97:22 98:23 M-O-R-E-L-I-A 18:21 ma'am 5:3 11:12 Mabton 58:5,6 Mac 15:10 Macias 43:11 mails 83:22,25 main 2:5 27:24 28:6,9 majority 65:3 73:3,24 making 9:25 64:5 MALDEF 2:15 2:18 manager 17:10 manages 17:15 manner 97:10 map 23:8,21,24 March/April 44:14 marking 86:20 marriage 28:1 28:24 | Martinez 26:2 masks 49:21 matter 90:17 matters 75:4 mayor 19:7 mean 12:24 17:10,19 23:9 28:8,21 31:23 32:4 33:6 34:21 37:3 39:13,13 47:24 53:19 54:11,11 54:24 55:10 57:23 59:5 60:19 61:11,12 62:9,11 64:8 64:23 65:21 66:15 67:20 68:1 69:10,19 72:20,20 73:22 79:12,25 83:7 83:12,19,20 84:15 86:6 88:1 89:16 90:25 91:15 93:20 meaning 61:18 means 8:21 67:14 meant 87:22,23 media 66:6 74:14 94:19 medications 8:14 meet 9:17 10:3 meeting 10:8,14 10:16,18 14:21 15:3 16:9 19:20 20:6 58:12 65:25 meetings 9:23 18:8,9 19:25 20:1,5,7 21:13 21:16 42:22,23 58:11 71:9 | Mel 7:15,16 8:9 9:14 11:10,20 18:23 22:20 23:17 31:13 32:8,10 41:18 44:5 46:8,8 48:1 70:14,18 76:4 80:13 81:18 85:20 86:22 88:13,21 91:5,9 92:7,11 92:20 94:5,7 95:20,22 96:10 member 65:13 members 11:3 61:5,19 memory 8:15,18 78:7,11 mention 72:5 mentioned 19:10 22:25 30:9,12 31:20 34:1 41:7,8 51:19 53:3,9 53:20 58:25 63:5,11 70:22 71:16 72:6 78:20 82:15 89:2 93:4,24 94:18 messaged 90:23 messages 79:5 80:15 82:5,18 87:21,23 89:12 90:1,22 91:1 92:6 Messenger 83:3 83:6 met 18:6,8,11 20:9 Mexican 2:17 7:24 19:13 33:6,12,13 62:10 64:7 69:14,14 94:8 | Mexicans 60:11 Mexico 34:9 38:12 44:10,16 48:9 Michoacán 18:21 19:2 Microsoft 15:21 middle 7:10 15:19 midpoint 47:3 migrant 60:19 migrate 49:16 million 55:19 mind 6:1 9:8 33:2 mint 63:16 minutes 10:15 16:17 mirror 27:20 28:23 mirrors 28:10 missing 91:21 mission 22:15 65:15 Mississippi 47:1 mix 39:19 55:12 mom 33:9 moment 75:21 85:12 momentum 5:25 money 35:23 36:7,10,13 48:23 Monitoring 49:11 month 90:23,25 months 51:7,8 82:13 92:3 Morelia 18:17 18:21 19:2,3,5 20:7 22:11,17 Morfin 2:21,22 2:22 43:21,24 morning 4:10 63:14 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-------------------------|-------------------------|-------------------------|------------------------|------------------------|
| mornings 64:1 | neither 33:21 | oath 4:5 8:9,20 | 37:10,21 38:11 | 47:5,8,18,21 |
| Moses 54:14 | never 12:15 | oaths 97:5 | 40:8,11 41:21 | 47:25 48:15,20 |
| 59:15 | 16:13 30:19 | object 6:24 | 45:18 46:6,12 | 50:14,17,21,25 |
| motions 97:17 | 31:12,24 38:25 | 80:11 95:20 | 47:20 48:18 | 51:19,24 52:3 |
| move 41:22 | 55:3 70:13 | 96:3 | 50:5 52:11,23 | 52:19 53:3,8 |
| moved 51:17 | 74:3 78:17 | objection 6:25 | 53:5,24 54:2 | 53:14,20,25 |
| 54:2 61:4 | new 73:17 | 11:5,16 23:15 | 54:15 55:14 | 54:9,21 55:8 |
| movement 70:7 | Newhouse 53:6 | 37:8 41:16 | 56:8 58:21 | 55:25 56:5,12 |
| moving 34:7 | Nicki 21:8,18,22 | 56:24 60:6 | 59:10 60:14 | 57:19,21,25 |
| 94:5 | 38:17,20,22 | 61:8,22 67:16 | 63:9,20,22 | 58:9 59:10,13 |
| MULJI 2:10 | 39:10,16 | 70:17,18 85:2 | 65:12,14 66:6 | 59:14,17,24 |
| mumbled 26:20 | nod 5:15 29:11 | objections 40:10 | 68:24 69:13,24 | 60:8 61:5,10 |
| | Nodded 73:13 | 97:9,17 | 70:16 71:11,13 | 63:4,11,18 |
| N | non 62:18 | obviously 5:13 | 73:5 79:21 | 64:3,11,25 |
| N 2:1 4:8,8 | non-Hispanic | occasion 19:10 | 81:7,13 82:12 | 65:9,23 66:20 |
| 92:23,23 | 95:14 | occurs 70:11 | 85:24 86:2 | 67:17,22 68:1 |
| name 4:10 7:6 | non-interest | October 1:20 | 94:23 96:7 | 69:21 70:3,9 |
| 10:9 26:3,4 | 66:7 | 4:1 97:20 | okay 5:4 6:3,10 | 70:22 71:16 |
| 33:18 39:17,23 | non-Latinos | 98:22 | 6:14,22 7:5,12 | 72:21 73:2,5 |
| 41:25 42:17 | 64:10 | offered 3:18 | 7:16,24 8:20 | 73:20,25 74:16 |
| 43:22,23 45:6 | non-white 58:18 | office 17:15 | 9:11,16 10:3,7 | 74:18,22 75:20 |
| 52:6,9,12 | Nope 9:13,20 | 22:24 24:25 | 10:14 12:2,17 | 76:2,4,15,16 |
| named 11:10 | 10:22 11:4 | 27:13,16 29:17 | 12:21 13:1,6 | 76:17,25 77:13 |
| 40:4 42:6 97:6 | 13:24 14:2 | 29:19,20 30:7 | 13:15,22 14:10 | 77:25 78:19,21 |
| names 25:25 | 16:25 20:11 | 30:9,13,15,15 | 14:16,22 15:1 | 78:22 79:7,15 |
| 43:7 45:12 | normal 28:1 | 30:22,24,25 | 15:5,7,25 16:9 | 80:14,17,18,24 |
| 46:1 71:22 | 87:16 | 31:1,5,22 32:3 | 16:13,18 19:20 | 81:3,7,14,18 |
| national 53:10 | Northwest 2:11 | 32:5 36:20 | 20:9,23 21:1,8 | 81:21,25 82:9 |
| 65:15 | 50:7 | 37:2,7 52:21 | 22:5,12,20 | 82:14,21,23 |
| near 58:17 | note 14:22 | 53:15,18 71:18 | 23:6,12 24:7 | 83:5,22 84:7 |
| necessarily 28:8 | noted 6:25 97:11 | 95:8 | 24:18 25:6,19 | 84:14,25 85:4 |
| 28:25 47:11 | notes 10:18 | offices 17:15 | 28:13 29:4,8 | 85:16 86:7,15 |
| 52:24 61:10 | notice 6:17 | 26:9 27:11 | 29:10,13 31:13 | 86:18,21,22 |
| 62:7 63:2 65:6 | 86:12 | 30:24 31:3 | 31:14,20 32:13 | 87:2,19,24 |
| 75:14,18 87:11 | noticeable 65:19 | official 1:9 | 33:15,24 34:14 | 88:8,13,14,15 |
| necessary 60:25 | November 30:4 | 25:13,14 52:10 | 34:23 36:19 | 88:18,22 89:24 |
| 90:21 91:17 | 32:22 | officials 71:17 | 37:11 38:8 | 89:25 90:11 |
| need 5:14 8:22 | nuclear 49:19 | oh 7:24 11:12 | 39:21 40:15,21 | 91:3 92:21 |
| 28:21 51:11 | 51:3 | 12:25 17:15,23 | 40:24 41:2,6 | 93:23 94:5,23 |
| 54:20 | number 4:19 | 18:7 20:14 | 41:11,14,21 | 95:5,22 96:7,9 |
| needed 36:7 | 40:25 | 21:19 22:12,14 | 42:6,9,14,21 | 96:12 |
| needing 6:11 | numbered 86:10 | 24:1 25:12,16 | 42:25 43:5 | old 17:17 71:24 |
| needs 27:10 | | 26:2 30:3 | 44:5,15,18,25 | Olympia 38:15 |
| negative 64:5 | O | 31:23 32:7 | 45:2,7,10,15 | once 90:23,25 |
| neighbors 95:25 | O 4:8 92:23 | 33:20 35:5,20 | 45:21,24 46:15 | online 64:6 |

| | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| open 14:22 15:18 36:22 76:21 80:20 86:7 opinion 13:13 37:22 67:8 opportunity 22:18 86:23 97:8 Ops 17:10 ORAL 1:17 organization 18:15 19:3 20:8 22:19 44:1 50:15 65:13 oriented 28:10 originally 29:15 origins 24:22 Othello 26:6 59:5 out-of-pocket 35:22 37:4 outcome 97:13 outgoing 30:18 outside 12:22 17:18 30:21 37:17 51:23 59:22 89:11 overall 95:1,2 overarching 66:2 overexpose 49:12 overlap 5:10 overqualified 32:11 overweight 24:13 owner 63:11 | pad 81:6 Padilla 43:15 page 2:25 3:12 55:8,23 98:5 paid 49:7 Palmer 1:6 2:7 43:9 45:16 98:20 paper 45:13 papers 15:5 paperwork 45:13 89:19 park 65:18,18 parking 53:2 Parra 43:19 part 8:20 18:13 18:14,14 23:2 51:21 74:9 77:20,23 78:19 78:21 79:2 81:17,19 86:24 89:15,23 93:9 93:17,25 particular 7:13 26:8 27:17 31:3 32:5 34:24 70:1,25 71:2,15 parties 75:6 97:9,12 partisan 34:24 35:14 73:15,21 partner 51:18 parts 12:23 23:23 93:4 party 9:14 11:3 20:2 25:7,8,11 27:19 28:10 35:12 65:20 66:10,13,13,18 66:19 75:1,3 97:11 Pasco 21:11 31:17 54:2 55:11 56:10 | 57:4,5 59:20 71:13 93:16 passers 66:16 passersby 66:8 pattern 64:21 patterns 64:12 64:14,17 65:7 66:22 67:1 Paul 11:11 12:10,21 16:19 19:9,10 70:13 78:13,13,24 79:4 89:3,18 91:1,19 pay 35:24 74:14 85:7 paying 84:25 85:5,13 pays 45:22 pending 6:16 people 17:19 19:7,12 36:24 37:2,5 44:2 49:11,13 58:12 60:18 61:2 62:9 64:10 71:17 75:17 78:15 87:4 percent 56:3,5 56:13 57:5,6 57:10 58:2,16 58:22 percentage 56:9 64:22 perfectly 29:11 period 92:4,8 person 9:18 10:10 31:10 45:22 64:6 personal 18:11 33:10 36:3 43:1 65:21 72:22,23,25 79:19 personally 42:18 | 64:3 PHILLIPS 2:10 phone 4:13 9:18 14:24 40:25 52:2,18 53:7,7 53:12 76:24 78:23 82:24 phrase 60:11 75:2 phrases 68:14 Physics 49:8 picking 63:23 pictures 19:18 pieces 89:2 place 53:6 placed 34:16 places 54:19 plaintiffs 1:7 2:7 2:15,21 4:12 4:20 14:7 43:6 Plaintiffs' 77:14 plants 49:19 platform 40:13 82:23 platforms 83:2 pleasantly 39:12 please 7:5 13:11 15:14 25:22 72:10 PLLC 2:22 plugged 76:24 pocket 36:12 85:8 pockets 36:10 point 6:3,11 13:17 34:15 73:9 polarized 67:13 polarizing 67:20 police 29:12 policies 69:17 75:1 political 11:3 12:14,23 21:22 26:8 27:3 39:5 | 39:6 51:24 53:10 politicians 18:9 politics 12:15,25 13:3,6 polls 67:8 popped 65:13 popular 71:12 population 23:11 56:3,18 57:4,25 58:19 58:20 59:2,8 59:25 60:2,13 60:24 69:25 70:7 73:4,19 portion 27:6 38:13 position 23:5 24:9,11,15 25:3 49:10 53:5 63:1 72:14 88:5 89:21 positions 26:11 possession 78:1 possibility 34:6 87:12 possible 25:4 possibly 22:24 post-attendee 15:15,18 posters 53:11 potential 35:13 35:14 44:15 potentially 87:9 power 22:18 powers 24:1 Prayed 16:12 pre 42:24 precisely 88:24 prefer 7:13 33:9 67:23 68:6 74:24 75:10 94:7 preferences |
| P | | | | |
| P 2:1,1 p.m 1:20 88:17 96:16 | | | | |

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 68:16 prefers 33:9 prejudice 62:5,7 62:12 Prentis 50:17 preparation 14:3 16:2 97:18 prepare 9:19,23 10:4 14:1 16:10 prepared 9:17 97:18 preparing 16:16 prepositional 68:14 present 6:23 10:8 47:19 president 21:11 35:7 53:12 presumption 94:19 pretty 19:14 28:23 30:18,23 33:7 36:22 42:16 48:9 51:20 52:25 56:15 57:6 58:6,10,15 59:6,19 60:17 62:4 65:19 66:15 71:6,11 71:24 89:18,20 91:9 92:1 93:22 prevalent 60:17 previous 9:3,6 42:21 51:3 prior 39:21 92:3 privilege 41:17 46:14 80:12 pro 28:1,1,23,24 probably 13:15 25:17 27:1 30:4 32:10 | 37:15 38:6 52:23 55:2 56:20 58:2,15 59:6 60:15 63:20,22 66:18 69:19 75:16 78:20 79:18 81:19,23 82:19 83:19,20 88:7 90:18 91:1 94:2 problem 15:20 40:16 procedure-wise 76:5 Proceedings 4:1 4:2 process 5:1 11:15,25 12:7 12:10 16:20 17:2 41:4 47:13 69:22 70:3,10 85:25 86:24 producing 80:14 Production 77:15 81:22 91:11,24 92:3 productive 51:12 professionally 21:15 profile 62:9 profiling 62:8 62:14 program 19:22 22:6,10,11 programs 49:6 prominent 27:2 promise 5:24 proper 56:21 properties 61:2 61:4 protective 49:22 50:2 | proud 33:11 provide 8:22 80:6 86:3 provided 26:1 80:10 providing 84:21 public 73:25 74:11 purposes 15:7 40:8,9 41:24 54:22 55:9 pursuant 97:4 97:18 put 17:18 36:10 54:21 putting 74:22 75:9 <hr/> Q <hr/> qualifications 97:10 quantity 35:3 question 5:8,17 6:4,5,7,16 7:1 9:4 11:21,23 23:20,22 26:20 41:19,23 57:14 65:23 66:2,4 68:1,10,11,20 73:23 77:8 80:13 84:17 95:10 questioning 6:19 56:25 questions 6:2,24 8:12,23 13:15 13:17 22:20 23:6 44:18 45:4 54:22 63:4 84:13,20 84:22 86:3,5 88:20 91:5,6 92:10,21,25 95:5 97:16 quick 44:19 | 75:21 87:2 quickly 95:20 Quincy 42:8,12 quite 58:25 68:9 68:24 72:3 quote 35:7 54:7 <hr/> R <hr/> R 2:1,4 97:1 R.W 3:3 race 7:19,21,23 7:24 33:3,5,6 61:15,16 62:3 63:2 66:22 67:1,5 74:22 75:9,14,18 race-based 63:6 races 66:23 67:2 67:20,24 68:7 68:18 69:2 75:17 racial 24:16 46:4,21,25 73:18 racially 23:2,8,9 23:22,24 67:13 72:19 radiation 49:11 49:25 radioactive 51:4 radiological 49:15 rah-rahing 53:2 raise 35:24 36:1 36:9 raised 48:14 54:11 raising 36:5,13 ramifications 49:18 ran 38:24 48:23 ranch 34:9 36:4 38:11 44:10,16 63:13 64:2 rate 7:22 | Raul 26:4 33:18 RBC 51:14 RCW 97:4 RDR 1:22 97:22 98:23 read 42:13 60:16 98:2 reading 16:17 ready 88:18 Reagan 35:7 really 19:13 33:23 38:25 54:25 55:3 70:12 74:9 75:4 95:19 reason 8:11,13 9:11 44:7 66:9 98:5 reasons 34:4 87:18 recall 21:3 36:16 40:24 41:12,12 42:25 52:13,21 85:7 recalled 12:15 receive 14:16 received 83:23 83:25 receiving 85:25 receptive 30:20 31:12 record 4:3 5:7 5:11,17,19 7:1 7:6,19 41:24 44:21,23 45:1 45:2 75:21,22 76:3 88:10,19 91:8,12 92:1 96:13 97:9 redistrict 70:1 redistricting 10:24 11:14,25 12:10,16,22 13:2,14,19 16:20 17:2,5,7 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 17:22 20:17 21:18 22:25 23:1,7,13 24:3 37:17 38:5 44:3 69:23 70:4,10 74:2,5 74:12 78:4 83:18,23 92:5 redrawn 23:2,8 23:9,10,11,24 34:14 72:19 73:6,18 redrew 24:2 reduced 97:7 Reed 51:16,16 refer 8:5 41:2,8 reference 26:11 referred 66:3 referring 8:5 23:25 73:10 refresher 70:16 70:20 regarding 17:1 83:23 region 54:23 55:11 Registered 1:23 97:22 regular 63:16 66:6 reiterate 5:8 related 16:23 17:4 20:12 21:17 41:14 83:18 84:17 relates 17:21 relating 77:7 relationship 69:14 93:20 relative 97:11 97:12 relevant 78:23 79:8,11 81:17 82:16 88:6 89:5,8 | religious 29:5 remember 9:2 10:9 18:7 25:25 26:5 33:19,22,23 36:15 40:7,22 41:1,5 47:23 47:24 52:9,12 52:20,23,24 53:11,19 54:2 54:18 56:11 59:10 62:21 63:9,10,22 70:21 77:18 82:7 84:19,21 84:23 85:23 86:1,25 87:23 88:4 93:5 remembered 12:15 Remote 1:17 4:1 repeat 68:1,1 96:6 rephrase 6:4 68:13 Reported 1:22 98:23 reporter 1:23 18:16,22 75:23 96:6 97:4,22 reporting 1:22 74:14 98:23 represent 77:13 representation 27:8,9,10,12 85:1,14 95:9 representative 1:14 32:10 42:8,11 representatives 11:3 18:8 52:7 represented 31:15 representing 4:11,20 20:8 | 27:16 31:18 represents 4:14 4:16 31:15 Republican 11:14,24 16:20 17:6 20:2 22:3 23:4 24:8 25:7 25:11 27:19 28:10 34:20 35:4,8 38:25 39:4,12 42:22 42:23 65:15 66:1,9,12,18 94:13 95:2,3 95:14 Republicans 12:25 13:4,19 35:6 64:20 65:2,4 94:16 request 18:16 79:1 81:22 88:2,3 96:6 requested 82:7 requesting 78:16 requests 77:15 78:2 82:1 85:21 87:16 89:1 91:10,11 91:23 92:3 require 92:5 required 60:21 Reservation 48:4,6 58:17 58:18 93:23 94:1,2 reserved 96:17 resident 42:12 residents 8:5,6 Residing 97:24 respect 91:18 respectful 94:7 respecting 40:13 respirators 49:23 | responded 89:8 responding 86:25 response 77:12 95:6 responses 5:14 87:1 responsive 78:2 82:1 88:25 91:10 restroom 6:12 results 65:1 retired 20:22,25 21:2,6,7 50:11 51:8 retiring 20:19 20:22,24 51:2 returns 66:21,25 reverse 64:21 review 10:16 14:3 76:25 84:14 85:20 86:23 97:8 reviewed 14:14 16:3,5 66:21 66:25 67:4 84:16 reviewing 96:15 rich 65:20 66:10 66:13 Richland 31:17 93:17 ricos 62:23 Ridley 84:5 right 7:5,25 9:7 11:15 13:16 14:23 15:2,24 23:1 24:6,14 34:6 36:23 39:1 47:6,25 57:13 59:7 70:23 76:18 83:1 84:12 85:22 87:7 88:7 89:9 90:2 | 96:13 Rights 47:6 70:15 rings 36:17 Rio 7:18 river 54:6 Rod 52:13 role 27:18 room 15:8 17:18 Royal 50:20,22 51:14 rude 40:9,12 rules 4:23 run 31:13 32:6 32:21 34:4 38:8,9,10,24 39:17 53:15 72:13 87:17 running 13:12 22:24 24:25 29:17,19,22 30:7,8,12,14 30:15,22,23 31:2,5,22 32:2 32:9,16 34:20 35:18,19 36:20 37:2,7 38:18 39:10 52:15,22 53:4,18 72:11 72:12 73:1 74:23 87:5,5,8 87:9,18 88:5 runs 17:13 <hr/> S <hr/> S 2:1 3:17 Safeway 53:2 satisfaction 79:19 Saul 26:2 savvy 78:10 83:4 saw 24:4 86:1 saying 64:25 65:20 66:12,14 88:1 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| says 15:18 32:7 80:25 scene 27:3 scheduled 44:6 school 48:3,4 50:8 62:20,21 62:24,25 63:6 63:14,15,23,25 64:1,4 93:24 schooling 49:7 screen 14:20 15:11,24 76:8 76:11 80:24 81:8,11 86:12 scroll 76:18,22 81:15,16 84:12 90:1,4,13 scrolled 88:7 90:25 scrolling 79:6 search 78:5,6,8 78:9,22 79:10 79:16 80:6,7 82:4 88:25 90:1,4,14 91:9 91:10,13,16,19 92:1,6 searched 89:16 89:25 searches 77:25 80:3 81:25 seats 67:6 Seattle 3:6 97:24 second 53:13 81:10 87:3 Secretary 1:9 4:15 Section 47:6 see 15:10 17:19 23:21 37:1 63:3 65:1 74:16 76:11,15 76:16 77:7,14 77:17 80:20,22 80:24 81:4,5,6 | 81:11,15 82:22 84:10 88:15 seeing 85:23 seeking 26:8,25 seen 77:9 81:18 84:17 selected 77:23 self-employed 50:13 Senate 11:13,24 senator 18:6 19:21 20:4,9 20:19 21:6 29:20 31:6,9 31:14 32:9 71:5 72:4,12 72:15 senators 17:13 17:16 20:1 send 12:12 80:19 89:19 sense 6:8,20 7:3 57:16,17,20,21 59:12 60:23 62:1 69:13 76:20 94:25 95:23 sent 14:5,24 16:6 45:14 77:24 78:12,15 78:18 80:21 81:4,20 separate 45:16 46:2 93:22 session 34:11 38:13,16 set 77:14 95:5 97:19 setting 75:3 shadow 31:11 shake 5:16 share 27:22 81:8 82:14 91:14,21 shared 86:12 sharing 76:8 | Sharon 31:6,6,9 31:14,21 71:5 72:2,6,7 she'd 21:14 she'll 39:14 shed 45:25 SHEET 98:1 shifted 60:5,10 Shirley 71:11,19 71:21 shop 18:7 shortly 88:16 shut 49:19 side 16:13 17:6 39:12 54:6 59:4 64:21 sign 97:8 Signal 83:3 Signature 96:17 98:18 significant 27:6 signing 97:9 silly 40:18 Simone 2:9 4:10 7:16 40:14 56:23 86:9 91:15 93:2 95:6 single 54:13 93:12 sister 18:15,17 19:22 20:7 22:6,11,16 58:11 93:21 sit 75:6 situations 18:10 six 25:17,17 51:7 51:8 86:11 Sixty 57:6 SLeeper@Ca... 2:12 Smith 3:4 4:14 societies 51:21 Society 17:16 sold 61:2,3 | sorry 5:22 8:1 11:19,21,21 13:11,14 17:19 17:20 23:18,20 25:20 29:9 31:2 33:25 40:15,17 47:7 48:19,24 52:9 52:12,17 54:18 55:17 60:8 68:11 70:18 77:6 85:12 86:18 94:22,23 95:19 96:5 sort 4:12 12:17 13:1,19 15:8 15:18 17:24 18:24 19:21,21 22:7 23:7 24:7 24:19,22 26:13 28:2,13,14,18 29:4 32:13 34:18 35:3 36:6,13 39:16 39:18 40:10 42:25 45:4,25 46:19 47:5 50:15 51:2 54:21 55:18 63:5,6,18 64:4 64:5 65:24 72:22 91:7 sorts 26:18 Soto 1:6 2:7 43:9 45:16 98:20 sound 43:22 sounds 18:19 52:10 91:15,16 91:18 South 2:18 Southcentral 44:2 54:10,24 55:2,4,6,10,24 56:1 59:25 60:5 61:7,21 | 62:15 64:15,18 67:2,9,25 68:8 68:18 69:2 Southeast 55:5 93:5 southeastern 55:1,14 Spanish 18:20 speak 17:1 50:19 66:10 69:16 speaking 4:15 4:21 specific 30:21 36:15 45:4 46:17 specifically 17:21 24:21 26:14 27:13 32:16 64:15 67:2 68:15,16 68:25 87:14 specifics 32:7 42:13 speculation 37:9 spell 7:6 18:18 spend 36:3 38:14 spending 34:10 38:12 spent 16:15 Spokane 52:25 spoke 12:21 13:22 24:24 spoken 26:7,13 30:6 31:21 32:2 35:17 53:17 Spring 2:18 sprung 60:15 SS 97:2 staff 11:1 staffer 16:19 standard 82:24 83:10 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | | | |
|-------------------------|------------------------|------------------------|---------------------------|------------------------|
| standing 56:24 | strong 93:20 | 91:21,22 | 59:3 75:5,6 | 15:25 18:22 |
| start 20:4 50:21 | stronger 94:3 | surprised 38:23 | 79:22 82:4 | 51:1 66:20 |
| 57:19 | studied 67:8 | 39:10,11,13 | 85:12 90:13 | 69:21 76:2 |
| started 12:7 | study 48:20 | survey 49:13,21 | 95:7 | 86:19 91:5 |
| 30:3 50:6,7 | stuff 13:5 14:8 | 49:22 50:1,1 | teachers 63:7 | 92:11,13,16,19 |
| 51:5,13 79:22 | 15:6 17:14,17 | surveys 28:15 | tech 78:10 83:4 | 96:11 |
| 90:8 | 21:16 31:8 | 28:21,25 | technical 49:4 | thanks 5:4 7:16 |
| state 1:9,10,14 | 32:12,20 36:24 | Susan 1:6 43:9 | 75:23 | 18:23 40:14 |
| 3:2 4:15,17 7:6 | 58:12 62:25 | Swan 48:4,11 | tell 4:5 8:21 | 57:2 75:3 |
| 17:2 25:7 50:2 | 63:6 65:18 | 93:24 | 39:16,18 40:25 | 86:21 92:15 |
| 53:10 64:12 | 71:10 79:22 | swat 5:24 | 44:13 57:15,16 | 94:5 96:10 |
| 66:22 67:1,6 | 81:23 87:18 | switch 87:2 | 69:10,22 | thereof 97:13 |
| 67:11,24 68:7 | submit 74:4,7 | switched 50:22 | ten 54:7 69:24 | they'd 62:24 |
| 68:17 69:2 | subparts 12:17 | switching 95:3 | tend 36:14 64:20 | thing 6:22 16:8 |
| 70:4,4 92:10 | 93:1 | sworn 97:14 | 65:2 66:3 69:1 | 22:3 33:10 |
| 92:13,15 97:2 | subset 94:9 | sworn/affirmed | 74:24 75:10 | 49:25 62:20 |
| 97:5 | suggest 33:15 | 4:5 | 94:19 | 65:21 70:6 |
| STATES 1:4 | suggested 31:9 | system 51:17 | term 55:9,13 | 81:8,14 87:17 |
| statistical 67:4 | 32:21 33:17,20 | | 67:13,20 73:12 | 90:8 |
| stay 49:24 51:12 | Suite 2:5,11,23 | T | terms 8:4 32:14 | things 5:5,16 |
| 51:12 | 3:6 | T 3:17 4:8 8:1 | 33:8 55:19 | 15:10 24:19 |
| stays 49:15 | suited 27:18 | 92:23 97:1,1 | 78:8 80:6,9 | 36:14 38:5 |
| stenographica... | summation 29:6 | tacos 62:24 | 94:7 | 51:4 88:23 |
| 97:6 | summer 82:11 | tail 48:24 49:1 | testified 4:6 74:3 | think 10:13 |
| step-off 49:14 | Sumner 2:5 | take 6:12,15,18 | testify 73:25 | 12:23 14:24 |
| stereotyping | Sunnyside 26:3 | 10:18 35:23 | 97:14 | 16:15 17:13,14 |
| 64:5 | 56:8 58:9,10 | 48:22 62:22 | testimony 5:20 | 18:19 22:7,13 |
| STEVEN 1:9 | support 20:3 | 76:4 88:10 | 9:12 74:4,8 | 22:17 26:2,3,4 |
| Stokesbary 2:4 | supporting 53:7 | taken 97:6,17 | 97:16 | 26:5 27:2,3,7 |
| 3:13 4:18 10:4 | suppose 70:12 | takes 37:4 | text 79:4 80:15 | 27:17,19,21 |
| 11:5,16,18 | supposedly | talk 5:6 9:16 | 82:5,18,23 | 28:10 31:11,16 |
| 14:17 23:15 | 73:23 | 10:25 13:1,6 | 83:10,12,14 | 32:17,25 33:17 |
| 37:8 39:21 | Supreme 47:16 | 29:14 35:18 | 87:4,20,23 | 33:18 34:17,21 |
| 40:3,14,24 | sure 5:9,9,19 | 37:12 46:10 | 89:11 90:1,22 | 35:2,7,10 |
| 41:3,15,16 | 6:17 8:2 10:1 | 48:1 73:9 | 90:23 91:1 | 36:22 37:3,4,6 |
| 46:8,13 47:10 | 32:1,4 39:23 | 83:11 | 92:6 | 38:3,21,24 |
| 60:6 61:8,22 | 42:16 45:7 | talked 12:22 | texted 78:14 | 39:3,13,14 |
| 67:16 70:17 | 49:11,13,14,22 | 20:14 21:19 | 82:15 89:4 | 40:4 42:8,12 |
| 80:8,11 85:2 | 50:10 52:16 | 31:3 32:13 | texting 82:23 | 42:16 44:7 |
| 86:9,15,18,21 | 53:15 54:7 | 35:17 41:12 | 83:2 | 48:15,19,25 |
| 88:12 91:14 | 55:16,19 56:8 | 47:9 72:3 87:3 | texts 15:10 | 50:10,11 52:4 |
| 92:20,24 95:22 | 57:6 59:23 | 87:12 95:6 | 78:22 79:7 | 52:6 53:14 |
| 96:9 | 74:21 84:1 | talking 22:6,23 | 82:17 87:24 | 54:5,14,15 |
| stop 63:7 82:14 | 87:19 89:17 | 24:22 26:18 | 90:14 | 56:10,14,20,21 |
| Street 2:5,11,18 | 90:7,9 91:14 | 28:14 49:10 | Thank 7:12 | 56:21,22 57:9 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 57:9 58:2,13 58:16,21,22 60:7,22 61:24 62:1,7,14,20 63:1 64:23 65:8,23 68:20 68:24 71:16,20 72:1,8 75:13 77:21 78:14,24 80:19 81:10,11 82:19 84:16,19 84:23 86:25 87:22 88:6,18 90:3,21 91:4 92:1 93:19 95:3 96:12,13 thinking 12:6,20 55:1 58:6 59:5 72:12,25 77:10 87:9 thinks 32:6 thinned 63:16 Third 81:22 thorough 91:10 91:13 92:5 thought 19:18 21:25 23:4 24:8 30:17,19 34:12,20 38:1 40:19 51:10 54:25 55:3,3,4 66:12 79:7 thousand 36:17 three 20:15 51:15 54:4,5 71:16 82:13 86:10 92:25 THRIFT-VIV... 2:17 Thursday 1:20 tier 50:18 ties 94:3 time 6:3,18 7:10 9:5 10:6 19:17 30:6 34:7,15 | 36:2,2,4,21,21 38:12 44:19 45:7 48:7 54:3 62:3 68:4 76:22 91:6,7 92:8,11 97:10 97:17 timeframe 44:14 90:10 times 10:3 19:16 50:2 94:18 tired 6:13 title 17:12 21:12 titled 81:5 today 4:21 6:2 6:11 7:14 8:9 8:20 9:12,17 14:19 91:6 today's 4:16 8:3 told 31:24 47:23 85:5 topic 87:24 88:3 Toppenish 57:12 58:1,17 Torres 21:8,18 38:18,20 39:10 39:16 Torres's 21:22 total 16:15 totally 6:14 touch 27:1 touched 16:18 60:22 tour 19:9 toured 19:8,8 tours 17:13 towns 71:15 tractor 63:13 transcribed 97:8 97:16 transcript 5:14 96:15 97:16,18 trend 95:3 Trevino 1:13 42:7,18 43:1 | Tri-Cities 52:25 54:4 93:9,12 93:15,19,25 94:4 trial 44:6 trips 44:12 Troyer 22:23 24:25 25:2,6 25:15 26:7 29:16 30:2,7 31:20 32:15 33:16 35:17 38:20 39:16 41:7,24,25 83:11,17 87:5 90:14 95:7 truck 63:13 trucks 19:4 true 97:16 98:3 truth 4:5,6,6 8:21 97:14,15 97:15 truthful 8:11 try 5:10 74:19 trying 26:5 61:11 turn 84:7 TV 66:6 two 4:22 20:14 42:10,10 51:14 51:15 53:8,24 54:16 59:7 61:2 77:20,21 82:13 85:16 86:10 95:12,15 typewritten 97:7 typically 36:7 | 68:22 81:1 83:16 umbrella 50:19 unavailable 44:8 underqualified 32:9 undersigned 97:4 98:2 understand 5:21 6:2 8:7,9,24 23:9 28:21 54:24 55:13 56:2 58:10 68:9,20 73:12 73:23 77:11 understanding 24:3 25:10 28:2,5,14,17 59:1 60:12 61:18 73:14,17 73:20 understood 6:6 unemployed 51:7,8 UNITED 1:4 unmuting 95:20 USDC 98:21 use 55:9,19 78:8 80:7 82:23 83:2 usually 15:19 | venture 60:3 verbal 5:15 verify 91:20 version 73:10,10 videoconferen... 2:2 views 24:20 visible 15:2 visit 19:5 voice 83:22,25 volunteer 52:1 77:23 volunteered 53:9 vote 24:12,19 31:24 34:20 65:7 66:3 69:3 69:6,8,19 74:24 75:7,15 75:18 95:16 96:8 voter 69:11 voters 28:3,6 64:12,15,18,22 65:2,3 67:9,23 67:23 68:6,6 68:17 69:1,1 74:23,25 75:5 75:5,10,11 votes 67:5 voting 47:6 59:24 60:2 64:11,14,17 65:4,6 66:22 67:1,13 68:17 68:21 70:14 73:3 |
| | | U | V | W |
| | | U.S 19:17 uh-uh 5:16 ultimately 38:8 38:9,10 um-hmm 5:16 6:21 8:8 37:6 | v 1:8 41:15 45:10,16,17 98:20 vague 11:6 Valley 55:11 values 27:19,20 27:22,24 28:12 28:23 29:5 75:2,14,16,18 96:8 various 93:4 | Waddell 51:16 51:16 waived 97:9 Walla 55:15,15 want 4:12,23 9:5 9:16 12:17 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 22:5,20 23:3 24:21 25:16 26:3 31:13,16 32:14,24 33:17 41:23 46:5,5 52:5,10 54:3 54:21 56:10 57:5,9,10 60:11,22 61:10 62:12,22 68:20 71:12,25 73:8 76:4,10,21 79:19,20 82:12 84:1 91:7 94:7 95:8,9 wanted 22:6,9 47:14 79:1 88:24 Wapato 33:19 58:14,16 washed 51:10 Washington 1:4 1:10,10 2:5,12 2:23 3:2,5,6 4:17 7:18 13:20 17:2,5 48:10 54:10,24 55:4,5,10,20 56:1 59:25 60:5 61:7,21 62:15 64:12,15 64:18 66:22 67:1,2,9,11,25 68:8,18 69:3 70:5 74:1,5,12 93:5 97:2,4,5 97:18,23,24 98:21 wasn't 10:11 39:3 52:11,24 85:8 86:11 87:15 91:21 water 6:13 63:14,15,25 way 6:22 9:18 | 24:4 34:23 45:24 74:16 90:20 ways 55:20 we'll 6:17 9:6 74:19 we're 6:19 12:25 13:4 15:7 27:6 31:25 40:13 45:3 47:25 48:1 55:5,8,19 55:23 56:2 59:3 61:15 62:2,2 75:4,4,5 88:18 we've 19:4 31:16 32:13 59:7 60:17,19 wear 49:23 50:3 web 15:17 week 50:23 weeks 44:8 weighting 24:17 welcome 92:12 92:17 went 19:23 20:1 20:1,7 48:12 48:17 50:8,8 51:15 79:18,20 80:1,22 89:16 90:4 92:2 93:24 West 2:23 7:18 Western 1:4 55:5 98:21 WhatsApp 83:3 wheelchairs 19:4 WHEREOF 97:19 white 8:5,6 48:4 48:11 62:18 64:18 65:2,3 67:23 68:6,17 68:23 69:1,7 | 74:23 75:5,10 93:24 94:6 95:13 whiteboard 81:6 wife 19:5 30:9 30:12,14,23 31:7 32:19 51:9 wife's 33:2,4 win 64:20 65:2 windows 15:1 winters 34:10 38:14 witness 2:3 40:6 41:21 46:12,15 60:8 88:14 92:12,17,22 96:11 97:6,7,9 97:14,19 98:20 wondering 44:19 91:11 word 18:20 23:1 24:14 31:10 36:24 39:2 62:8 80:3 wording 12:8 words 24:10 work 6:23 9:9 17:4 22:7 31:11,23 48:2 50:4 51:11,15 52:2 60:20,25 63:1,12,19 74:19 88:11 worked 50:11 51:24 52:1 64:2,2 workers 60:19 workforce 62:1 working 11:14 11:25 49:5,10 50:6 51:13 62:17 91:12 works 6:18 17:12 41:4 | worn 49:23 worries 68:12 worry 5:24 29:10 wouldn't 28:8 34:7 60:3 WPPSS 50:6 wrapping 88:23 write 50:1 written 5:14 13:25 74:4 <hr/> X X 3:17 4:8 15:19 15:21 81:9 92:23 <hr/> Y yada 14:9,9 Yakama 48:6 93:23 94:1,2 Yakima 18:6,9 18:15 19:7,8 22:17 33:21 42:12,22 54:12 54:12 55:10 56:18,21 57:8 59:21 93:16,18 93:21,21 94:3 94:3 Yakima/More... 18:14 Ybarra 1:14 42:15 43:3 yeah 10:6 11:23 14:15,15 18:4 19:19,23,23 21:7,24 22:4 22:12 25:23 26:4,6,16,21 29:7,10,11 30:20,25 31:12 32:4 33:8 34:6 34:21 35:1,16 35:20 36:8,25 | 37:3,4 39:25 40:20 42:4,16 45:23 46:16 47:13,13,22 48:9,14 53:5 53:19 55:22,24 56:7 57:14,24 60:11 62:13 64:9 66:15,15 67:19 68:19 70:20 71:21 72:5,7,7,7,11 73:1 75:3 76:16 77:7,8 78:4,5,24,24 79:12,12 81:10 81:13,13 83:4 83:19,21 84:15 84:16,19,24 85:9,9,21 86:6 86:24 88:12,14 88:14 89:10,14 90:2,15,18,21 91:25 94:22 96:7 year 48:18 50:10 53:24 54:16 73:11 82:10 92:2 years 17:18 18:6 20:15,15 25:16 25:17,17 30:8 30:16 31:9 42:23 49:20 51:14,15,18 52:2,4 53:24 54:8,13 69:24 71:11 <hr/> Z zone 49:15 Zoom 2:2 9:18 14:21 15:3,15 15:18 75:23 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Ismael G. Campos

October 13, 2022

Page 116

| | | | | |
|-------------------------|-------------------------|------------------------|--|--|
| 0 | 73:12,16 81:5 | 80 48:18 | | |
| 09 81:5 | 97:20 98:22 | 800 3:6 | | |
| 1 | 2023 44:9 97:23 | 833 1:23 98:24 | | |
| | 23rd 97:20 | 8h 44:8 | | |
| 10:29 44:24 | 24 48:11 | 8th 29:23 31:16 | | |
| 10:42 44:24 | 2711 1:22 97:23 | | | |
| 1003-1/2 2:5 | 98:23 | 9 | | |
| 11:00 53:1 | | 9:29 1:20 4:2 | | |
| 11:30 75:24 | 3 | 90 50:24,24 | | |
| 11:34 75:24 | 3:22-cv-05035... | 90014 2:19 | | |
| 11:58 88:17 | 1:10 98:21 | 9008 7:18 | | |
| 1101 2:11 | 308-14-135 | 92 3:13 | | |
| 11th 2:18 | 97:18 | 95 50:10 | | |
| 12 81:5 | 365-3376 1:23 | 98104 3:6 | | |
| 12:00 53:1 | 98:24 | 98390-1444 2:5 | | |
| 12:05 88:11 | 4 | 99336 2:23 | | |
| 12:06 88:17 | 4 3:13 | | | |
| 12:29 1:20 96:16 | 40 56:20 57:10 | | | |
| 13 1:20 4:1 | 58:22 | | | |
| 98:22 | 400 2:11 | | | |
| 14th 2:11 | 5 | | | |
| 15 13:7 29:21 | 5 2:5 | | | |
| 30:7,13,15 | 5.28.010 97:4 | | | |
| 32:17 33:16 | 50 56:3,5,13 | | | |
| 34:5,16 35:18 | 58:2,22 | | | |
| 38:8,18 45:11 | 56 48:9 63:21 | | | |
| 46:3,21,23 | 58 48:10 | | | |
| 72:17,24 73:3 | 6 | | | |
| 73:9,15 87:6 | 60 56:10 57:5 | | | |
| 87:10 | 58:8,16 59:4 | | | |
| 15th 12:11 34:8 | 634 2:18 | | | |
| 1990 50:5,7 | 65 54:18 | | | |
| 1st 44:8 | 6th 63:23 | | | |
| 2 | 7 | | | |
| 2 47:6 97:23 | 70 58:12 | | | |
| 20 10:15 16:17 | 7325 2:23 | | | |
| 2000 3:6 | 79 48:18 | | | |
| 20005 2:12 | 7th 63:23 | | | |
| 2011 50:11 51:4 | 8 | | | |
| 2021 11:14,25 | 8 33:24 34:2,17 | | | |
| 16:20 17:1 | 70:23 71:1,4 | | | |
| 74:1,5,12 | | | | |
| 79:24 90:5,20 | | | | |
| 2022 1:20 4:1 | | | | |