

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

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Remote Deposition Upon Oral Examination of
Alex Ybarra
December 5, 2022

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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.

REPORTED BY:
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With the exception of the objection on page 122, Intervenor-Defendants join with the State in their stated objections throughout this transcript.

Alex Ybarra

December 5, 2022

Page 1	Page 2
<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 ALEX YBARRA</p> <hr/> <p>Monday, December 5, 2022 9:00 a.m. to 12:35 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 FOR THE WITNESS and INTERVENOR-DEFENDANTS: 3 ANDREW R. STOKESBARY 4 CHALMERS & ADAMS, LLC 5 1003 Main Street, Suite 5 6 Sumner, Washington 98390 7 DStokesbary@ChalmersAdams.com 8 FOR PLAINTIFFS SOTO PALMER, et al., 9 on behalf of CAMPAIGN LEGAL CENTER: 10 11 SIMONE LEEPER 12 MARK GABER 13 ANNABELLE HARLESS 14 ASEEM MULJI 15 BEN PHILLIPS, Legal Fellow 16 ELLEN BOETTCHER 17 CAMPAIGN LEGAL CENTER 18 1101 14th Street Northwest, Suite 400 19 Washington, DC 20005 20 SLeeper@CampaignLegalCenter.org 21 AHarless@CampaignLegalCenter.org 22 AMulji@CampaignLegalCenter.org 23 BPhillips@CampaignLegalCenter.org 24 25 FOR PLAINTIFFS on behalf of MORFIN LAW FIRM: EDUARDO MORFIN MORFIN LAW FIRM, PLLC 7325 West Deschutes Avenue, Suite A Kennewick, Washington 99336 Eddie@MorfinLawFirm.com FOR DEFENDANT STATE OF WASHINGTON: ANDREW R.W. HUGHES KATE WORTHINGTON Assistant Attorneys General ATTORNEY GENERAL OF WASHINGTON Complex Litigation Division 800 Fifth Avenue, Suite 2000 Seattle, Washington 98104 Andrew.Hughes@ATG.Wa.gov Kate.Worthington@ATG.Wa.gov</p>
Page 3	Page 4
<p>1 EXAMINATION INDEX 2 ALEX YBARRA PAGE 3 By Ms. Leeper 4 4 By Mr. Hughes 120 5 By Mr. Stokesbary 121 6 7 * * * * * 8 9 EXHIBITS 10 NUMBER DESCRIPTION INTRODUCED 11 1 Intervenor-Defendants' Objections 114 12 and Responses to Plaintiffs' First 13 Set of Interrogatories 14 2 Intervenor-Defendants' Objections 114 15 and Responses to Plaintiffs' Second 16 Set of Interrogatories 17 18 19 20 21 22 23 24 25</p>	<p>1 December 5, 2022, Remote Proceedings: 2 PROCEEDINGS: 9:00 a.m. 3 (Discussion off the record.) 4 ALEJANDRO "ALEX" YBARRA, 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 Okay. Good morning, Representative Ybarra. We just 11 met off the record, but for the record my name is 12 Simone Leeper, and I'm counsel for the plaintiffs in the 13 Soto Palmer v. Hobbs case. 14 I'm going to identify some other individuals that 15 you'll see on your Zoom screen now, which is the other 16 attorneys in the room. So obviously you know your 17 Representative Drew Stokesbary. Also online is Kate 18 Worthington for the Secretary of State and Andrew Hughes 19 for the State of Washington. 20 Off video but also joining us are some additional 21 people from the counsel of the plaintiffs' team, and 22 that's Annabelle Harless, Ben Phillips, Mark Gaber, 23 Aseem Mulji, and Ellen Boettcher. So they'll be joining 24 us today but staying off camera. 25 I'd love to go over just some of the ground rules of</p>

1 (Pages 1 to 4)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 5	Page 6
<p>1 a deposition. Before I do I want to ask have you been 2 deposed before? 3 A Yes. 4 Q Okay. So we're going to talk a little bit more 5 about that later, but for now just going into the 6 generalities of things. 7 Jeanne covered this a little bit off the record, but 8 to make things easier for our court reporter today you and 9 I are going to try to avoid talking over each other. So 10 I'm going try to finish my complete question, and then 11 I'll give you an opportunity to give your complete answer 12 without running over one another, to make a clean 13 transcript today. 14 Does that work for you? 15 A Yes, it does. 16 Q Okay. Also to make for a cleaner transcript, if you 17 can give verbal responses. We're used to saying things 18 look uh-uh or um-hmm or nodding or shaking our heads in 19 response to simple questions, but if you could make clear 20 yeses or nos and say everything out loud. 21 Does that make sense? 22 A It does. 23 Q Great. If I ask you a question and you don't 24 understand it, please ask me to clarify and I can rephrase 25 or give you a little bit more understanding; but if I ask</p>	<p>1 you a question and you answer it, I am going to assume 2 that you understood the question. 3 Does that make sense for you? 4 A It does. 5 Q This is going to go hopefully not too long, but it 6 will be a little while. So you may find yourself in need 7 of a break to step out or get a glass of water. If you do 8 find yourself needing a break, we can absolutely take one. 9 I would just request that you not ask to take break 10 while a question is still pending. And if we're right in 11 the middle of a line of connected questions, I might ask 12 if we can finish that line of questioning before we go to 13 a break. 14 Does that work for you? 15 A It does. 16 Q Okay. And Jeanne mentioned earlier that you should 17 take a quick pause after you answer a question just to 18 give her a chance to fully jot it down. And as a note, 19 sometimes during that pause some of the attorneys on the 20 line might object to my question. If they issue an 21 objection that's noted for the record, but you do still 22 have to answer the question that I asked you. 23 Does that make sense to you? 24 A It does. 25 Q Okay. You mentioned earlier that you had been</p>
Page 7	Page 8
<p>1 deposed before. 2 How many times have you been deposed? 3 A One. 4 Q And what case was that for? 5 A I was a school board member in Quincy, Washington, 6 for the school district, and one of the principals that 7 was let go by the school district -- I'm not sure of the 8 exact comment, but complained about her being let go. 9 Q And what was the basis of her complaint? 10 A I think it was why she was let go. 11 Q Okay. And were there any allegations of 12 discrimination in that case? 13 A Not that I remember. 14 Q Okay. And when about was that? 15 A 2019, '18, I think, somewhere around there. 16 Q Okay. Thank you for answering these questions. 17 I'm going to go very high level now. 18 Could you please state and spell your full name for 19 the record? 20 A Sure. It's Alejandro Ybarra. A-L-E-J-A-N-D-R-O. 21 Ybarra is spelled Y-B-A-R-R-A. But I go by Alex because 22 nobody can say Alejandro Ybarra. 23 Q I probably can say Alejandro Ybarra, but I will go 24 ahead and just call you Representative Ybarra or Alex 25 today, if that's what you would prefer.</p>	<p>1 A That's fine. 2 Q Great. For the record what is your race? 3 A I'm Mexican American. 4 Q In today's deposition I'm going to be using the 5 terms Hispanic and Latino interchangeably, and when I 6 refer to White residents I'm going to be referring to 7 White residents who do not identify as Hispanic or Latino. 8 Do you understand those terms? 9 A Yes. 10 Q Also, since this case addresses a specific 11 geographic area I'm going to be using the term 12 Southcentral Washington to encompass the Yakima Valley and 13 Pasco region, as well as Benton, Adams, and Grant 14 counties. 15 Do you understand that term Southcentral Washington? 16 A I do. 17 Q Do you understand that you're under oath today? 18 A Yes. 19 Q Is there any reason why you can't give truthful 20 answers to my questions today? 21 A No. 22 Q Are you taking any medications that might impair 23 your memory? 24 A No. 25 Q And do you have any conditions that might impair</p>

2 (Pages 5 to 8)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 9	Page 10
<p>1 your memory?</p> <p>2 A No.</p> <p>3 Q Part of the oath that you took today was to tell</p> <p>4 the whole truth, which means providing full and complete</p> <p>5 answers to the questions that I ask.</p> <p>6 Do you understand that?</p> <p>7 A Yes.</p> <p>8 Q Sometimes it might happen that to provide a full and</p> <p>9 complete answer to a question, you might have to go back</p> <p>10 and add to a previous answer that you gave if you remember</p> <p>11 something or there's a clarification that comes to mind.</p> <p>12 If that happens you can just go ahead and let me know in</p> <p>13 that moment that you need to add to a previous answer or</p> <p>14 that you want to clarify something, and we'll do that</p> <p>15 right then while it's on the top of your mind.</p> <p>16 Does that make sense?</p> <p>17 A It does.</p> <p>18 Q And is there any reason why you can't give full,</p> <p>19 complete and accurate testimony today?</p> <p>20 A No.</p> <p>21 Q Representative Ybarra, have you ever been party to a</p> <p>22 lawsuit in your personal or official capacity?</p> <p>23 A Yes. We just talked about that deposition or the</p> <p>24 lawsuit.</p> <p>25 Q And other than that Quincy school board case is</p>	<p>1 there any other lawsuit you've been involved in in your</p> <p>2 personal or official capacity?</p> <p>3 A No.</p> <p>4 Q Did you meet in person, by phone, by Zoom or</p> <p>5 otherwise with anyone to prepare for this deposition</p> <p>6 today?</p> <p>7 A Yes.</p> <p>8 Q And who did you meet with?</p> <p>9 A My lawyers.</p> <p>10 Q Okay. So for this next set of questions I'm asking</p> <p>11 you general questions about that meeting, but I'm not</p> <p>12 asking about the content of conversations that you had</p> <p>13 with your attorneys.</p> <p>14 So how many times did you meet with your lawyers?</p> <p>15 A I don't know the exact amount. Three times, four</p> <p>16 times, something like that.</p> <p>17 Q And who was present at those meetings?</p> <p>18 A Representative Stokesbary and another lawyer. I do</p> <p>19 not recall his name.</p> <p>20 Q When about did those meetings occur?</p> <p>21 A I'm trying to recall the dates or close to the</p> <p>22 dates, but probably September, you know, was, I think, the</p> <p>23 first one, somewhere around there.</p> <p>24 Q And have you had any more recent meetings than that?</p> <p>25 A Yes.</p>
Page 11	Page 12
<p>1 Q When was the most recent meeting that you had to</p> <p>2 prepare for this deposition?</p> <p>3 A Last week.</p> <p>4 Q And where was that meeting held?</p> <p>5 A It was a Zoom meeting, so I was at home.</p> <p>6 Q And about how long did it last?</p> <p>7 A Half hour.</p> <p>8 Q And for the other meetings that you had to prepare</p> <p>9 for the deposition, what's your ballpark on how long those</p> <p>10 lasted?</p> <p>11 A An hour.</p> <p>12 Q And you said there were maybe about three or four</p> <p>13 meetings in total?</p> <p>14 A Yes.</p> <p>15 Q Okay. Did you review any documents at the meeting</p> <p>16 with your attorneys?</p> <p>17 A Yes.</p> <p>18 Q Did you take any notes at those meetings?</p> <p>19 A Not that I recall.</p> <p>20 Q You mentioned earlier off the record that you had</p> <p>21 some notes in front of you now. Could you tell me</p> <p>22 everything that you've got in front of you?</p> <p>23 A Yes. Take my time. Only answer what's asked.</p> <p>24 MR. STOKESBARY: Hey, I'm going to</p> <p>25 interject here and just clarify that I'm hoping that</p>	<p>1 Simone's question was along the lines of describing in</p> <p>2 general what they are; but to the extent that she's asking</p> <p>3 specifically what the notes are and those notes involve</p> <p>4 things I've communicated to you, Alex, I'm instructing you</p> <p>5 not to answer that question.</p> <p>6 Q (By Ms. Leeper) So do you just have a sheet in front</p> <p>7 of you with general instructions about answering</p> <p>8 deposition questions?</p> <p>9 A I guess I'm a little confused -- a little bit, but</p> <p>10 yes.</p> <p>11 Q Okay. And do you have any other documents in front</p> <p>12 of you right now?</p> <p>13 A No.</p> <p>14 Q Since we are obviously doing this over Zoom, you</p> <p>15 have your computer in front of you. Are there any windows</p> <p>16 open on your computer?</p> <p>17 A Yes.</p> <p>18 Q Are there any windows open other than the Zoom</p> <p>19 window?</p> <p>20 A Yes.</p> <p>21 Q Okay. I'm going to ask you to go ahead and close</p> <p>22 any other windows, including email or anything like that.</p> <p>23 A Even Fantasy Football?</p> <p>24 Q Even Fantasy Football.</p> <p>25 A Okay.</p>

3 (Pages 9 to 12)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 13	Page 14
<p>1 Q I'm going to do my best not to make this run into</p> <p>2 Monday night football, because I am a Bucs fan. So</p> <p>3 hopefully there shouldn't be any big shifts in your</p> <p>4 fantasy team over the course of this deposition.</p> <p>5 So I will say that for having something in front of</p> <p>6 you for the deposition, I understand the drive to do that,</p> <p>7 to keep instructions from your attorneys at top of mind;</p> <p>8 but I do think that if you're going to have something in</p> <p>9 front of you during this deposition, we would ask that you</p> <p>10 make a copy of it and have your attorney send that to us.</p> <p>11 So if we want to avoid having that, if you could put</p> <p>12 that document away for the duration of this deposition,</p> <p>13 that way we don't have to get into that.</p> <p>14 Does that work for you?</p> <p>15 A Well, they're my reminders, so it doesn't really</p> <p>16 work that well for me.</p> <p>17 Q Yeah.</p> <p>18 MS. LEEPER: Really quick just to Drew. I</p> <p>19 think that's sort of our position. If he's going to have</p> <p>20 something in front of him during the deposition, we</p> <p>21 unfortunately do need to see that.</p> <p>22 So how would you like to instruct your client to</p> <p>23 proceed?</p> <p>24 MR. STOKESBARY: Yeah, Alex, is it possible</p> <p>25 to just close that window, too?</p>	<p>1 THE WITNESS: Yes.</p> <p>2 MR. STOKESBARY: Or if you printed it out,</p> <p>3 just, you know, stick it in a drawer or other room or</p> <p>4 something?</p> <p>5 THE WITNESS: Sure. I will stick it over</p> <p>6 here.</p> <p>7 MS. LEEPER: Okay.</p> <p>8 MR. STOKESBARY: I apologize. Sometimes,</p> <p>9 Alex, we take these little, tiny things for granted as</p> <p>10 lawyers. We do these all the time. This is kind of a</p> <p>11 routine thing.</p> <p>12 I forgot to consciously say, "And also you can't</p> <p>13 have something in front of you." So my apologies for</p> <p>14 that, Alex.</p> <p>15 MS. LEEPER: Yes. And sorry for the</p> <p>16 formality of it. It's just the way it is. But thank you</p> <p>17 for being flexible with that, Representative Ybarra.</p> <p>18 Q (By Ms. Leeper) Okay. So other than the</p> <p>19 conversations that we've talked about already with your</p> <p>20 counsel team, did you discuss this deposition with anyone</p> <p>21 else?</p> <p>22 A No.</p> <p>23 Q So that includes you didn't talk about it with --</p> <p>24 Oh, go ahead. You were about to say something else?</p> <p>25 A I did mention that I was part of this lawsuit to</p>
Page 15	Page 16
<p>1 other people, --</p> <p>2 Q Okay.</p> <p>3 A -- but I did not give any details to it.</p> <p>4 Q And who have you mentioned that you're part of this</p> <p>5 lawsuit to?</p> <p>6 A My brother. I think my family. That's all.</p> <p>7 Q Had you talked about being a part of this lawsuit</p> <p>8 with any commissioners from the 2021 Redistricting</p> <p>9 Commission?</p> <p>10 A From the redistricting?</p> <p>11 Q Yes.</p> <p>12 A No.</p> <p>13 Q How about any staff from that Commission?</p> <p>14 A No.</p> <p>15 Q Any members or representatives of a political party?</p> <p>16 A Yes.</p> <p>17 Q And who was that?</p> <p>18 A Drew Stokesbary.</p> <p>19 Q Anyone else?</p> <p>20 A Not that I recall.</p> <p>21 Q Have you spoken to any other legislators about being</p> <p>22 a part of this lawsuit?</p> <p>23 A Yes.</p> <p>24 Q And who is that?</p> <p>25 A I spoke with Representative Abbarno.</p>	<p>1 Q Anyone else?</p> <p>2 A Not that I recall.</p> <p>3 Q And for your conversation with Representative</p> <p>4 Stokesbary, was that before he was your attorney or after?</p> <p>5 A Before.</p> <p>6 Q And when about did that conversation occur?</p> <p>7 A Like September or so, I think.</p> <p>8 Q And what year September?</p> <p>9 A 2022.</p> <p>10 Q Okay. Did you have any conversations with</p> <p>11 Representative Stokesbary about this matter in 2021?</p> <p>12 A No.</p> <p>13 Q Earlier you said Representative -- I'm sorry, I</p> <p>14 think I missed the name. Could you spell out the other</p> <p>15 representative? I think it was Abbarno.</p> <p>16 A Yeah. I don't know how to spell his name, but I'll</p> <p>17 give it a shot. A-R-R-B-A-N-O, something like that.</p> <p>18 Q And do you know what district he represents?</p> <p>19 A No, I don't. The Chehalis area, I think.</p> <p>20 Q Okay. And what did you talk about with him with</p> <p>21 regard to this case?</p> <p>22 A This was on like Thursday of last week, and I think</p> <p>23 we were talking about what I was doing Monday. Because we</p> <p>24 were discussing -- It was a hydrogen caucus meeting at the</p> <p>25 state -- at the Capitol, and we were discussing if we</p>

4 (Pages 13 to 16)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 17	Page 18
<p>1 could talk about that on Monday. And I said, "Well, I 2 don't know how long this" -- this, what I am doing now -- 3 "is going to go." So I wasn't sure if I could meet with 4 him. 5 Q Got it. And you also mentioned that you had some 6 conversations with Representative Stokesbary about the 7 matter before he was your attorney. 8 What was the content of those discussions with 9 Representative Stokesbary before he was representing you? 10 A I think it was about the lawsuit that came about 11 about the 15th, that somebody had filed -- I was asking 12 some questions to Representative Stokesbary because he was 13 a lawyer. He was not my lawyer, but he was a lawyer that 14 might know what that all means. 15 Q And when you say the lawsuit that came about about 16 the 15th, are you referring to this lawsuit? 17 A I don't know. I just remember reading the Yakima 18 paper, and it talked about -- If I remember correctly, it 19 talked about the lawsuit about District 15. 20 Q And what did you guys talk about with regard to that 21 lawsuit? 22 A I guess I just didn't understand the legal 23 terminology of what that -- what a lawsuit means and what 24 the -- what that entailed; but I figured since it was 25 using a lot of legal terms, I thought I'd ask a lawyer</p>	<p>1 that might know better than I. 2 Q And did Representative Stokesbary sort of explain 3 those terms to you? 4 A Yes. 5 Q Did he express any opinion about the lawsuit? 6 A Not that I remember. 7 Q Did you express any opinion about the lawsuit to 8 him? 9 A Yes. 10 Q And what did you say? 11 A Well, I was -- I think I mentioned that 12 Mattawa/Schwana area, that was new to the 15th. It used 13 to be my district, and I was -- I was wondering why it 14 moved away from the 13th and became part of the 15th, and 15 I didn't know why. 16 Q Did you have any thoughts in favor or against the 17 move of Mattawa out of the 13th District into the 15th 18 District? 19 A I was not in favor. 20 Q And why is that? 21 A Because I've been serving the Mattawa and Schawana 22 area. And also the Wanapum Indians that live in that 23 area, I worked with them. I worked down at -- I used to 24 work for Grant County PUD, and I was stationed down at 25 Wanapum Dam, which is close to those areas, and also</p>
Page 19	Page 20
<p>1 Priest Rapids Dam. 2 So I had offices there, so I knew a lot of the folks 3 that lived there; and I was sad to potentially lose them 4 as my constituents. 5 Q When you talked to Mr. Stokesbary about that did he 6 say anything to you about why Mattawa had been moved? 7 A Not that I recall. 8 Q Did you have conversations with anyone else about 9 Mattawa being moved into LD 15? 10 A Yes. 11 Q Who else? 12 A I don't recall. I just remember a lot of, you know, 13 just conversation about the new maps that came out and 14 just speaking to people in general about what happened to 15 their districts -- what they gained, what they lost, which 16 areas are whose. 17 Q Do you recall speaking with any of the redistricting 18 commissioners about the movement of Mattawa? 19 A Yes. 20 Q And who did you speak to about that? 21 A Paul Graves. 22 Q And what did you tell Paul Graves or discuss with 23 Paul Graves about Mattawa being moved? 24 A I think I said I didn't want them moved out of my 25 district.</p>	<p>1 Q And was that before the final maps were passed? 2 A Yes. 3 Q When abouts would you say that conversation 4 occurred? 5 A You know, I don't recall. I just know it was prior 6 to the final map coming out. 7 Q How did you have that conversation with him? 8 A By phone. I think it was phone or Zoom. I think it 9 was phone. 10 Q Okay. And do you recall if that conversation was 11 occurring before or after commissioners released draft 12 maps on September 21st? 13 A I don't recall. 14 Q What did Paul Graves say to you about your concerns 15 with Mattawa being moved? 16 A Well, the bigger concern for me was I was going to 17 go -- My district might have gone into King County, into 18 North Bend. So that's what I was really concerned about, 19 because that's a big jump. And that's what I would 20 consider a different group of folks because they're King 21 County, and I'm in rural Washington. 22 Q Got it. And so that wouldn't have made sense, you 23 know, for your district; is that right? 24 A Not for me. 25 Q Okay. So I understand that concern, but</p>

5 (Pages 17 to 20)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 21

1 specifically with regard to your conversation with
 2 Commissioner Graves about Mattawa, what did he say about
 3 that?
 4 A I think that he mentioned, "If I give you King
 5 County, then something has to go away from the rest of
 6 your district."
 7 For instance, if he moved me to King County and I
 8 get constituents there, then I potentially could lose
 9 Lincoln County and other portions of my district.
 10 Q Did he say why you had to make this exchange?
 11 A Not clearly. He just said, you know, as the maps
 12 change and move and, you know, as people -- if I go King
 13 County, I have to lose something. And he was basically
 14 just telling me, you know, I have to get rid of some --
 15 not rid of; but if the lines change towards King County,
 16 then something has to be removed, and Mattawa was one of
 17 those areas.
 18 Q And did you express a preference about moving part
 19 of King County into your district versus keeping Mattawa
 20 in your district?
 21 A I expressed my feelings that I do not want to go to
 22 King County.
 23 Q Did you ever discuss the racial composition of
 24 Mattawa during those conversations with Paul Graves?
 25 A Not that I recall.

Page 22

1 Q You had mentioned earlier there's a native
 2 population in Mattawa that you feel you've represented.
 3 Did that come up in the conversation?
 4 A Not that I recall. In fact, just to -- In fact,
 5 they actually live in Yakima County, but they live on the
 6 other side of Priest Rapids Dam, so -- But they all work
 7 for Grant County PUD.
 8 Q Okay. During your conversations with Paul Graves
 9 did the Voting Rights Act ever come up?
 10 A No.
 11 Q How many times would you say you discussed this
 12 Mattawa issue with Paul Graves?
 13 A I wouldn't call it a Mattawa issue. I would call
 14 it -- I would call it a King County issue, but I think
 15 twice.
 16 Q And both of those occurred prior to the passage of
 17 the final maps; is that right?
 18 A I think so. I don't know the exact amount of time,
 19 if it was once or twice that I spoke with him. And I
 20 can't remember --
 21 I know we spoke once before, and I think we spoke
 22 afterwards, that -- When they gave us the final map I
 23 think I had a conversation. I don't -- I do not recall if
 24 I did or not, but I think I talked to him twice.
 25 Q Okay. And were both of those over the phone or by

Page 23

1 Zoom?
 2 A Yes.
 3 Q Was anyone other than you and Paul Graves present
 4 for those conversations?
 5 A Yes.
 6 Q And who was that?
 7 A Representative Tom Dent.
 8 Q And did he have a position on the matter?
 9 A Yes.
 10 Q What was his position?
 11 A He did not want to go to King County.
 12 Q Anything else?
 13 A No. That was pretty much about it for Tom.
 14 Q Did Commissioner Graves respond to him in any way?
 15 A Yes.
 16 Q What was that response?
 17 A Well, he was -- I think his response was, "We're
 18 looking at the whole state, not just the 13th. So we have
 19 to make changes to make sure we have the same amount of
 20 people in District 13 as the 15th and the rest around."
 21 So one -- As we all know, as one district changes
 22 then another one changes as well, so they're all
 23 interrelated. So he was explaining his rationale as to
 24 why the maps looked like they did at that moment.
 25 Q Was Anton Grose ever present for these discussions?

Page 24

1 A Not that I recall.
 2 Q Okay. Did Commissioner Graves ever tell you why
 3 Mattawa ultimately ended up in LD 15, the final map?
 4 A Not that I recall.
 5 Q Do you recall ever asking him?
 6 A Yes. I think his response was King County. "You
 7 get King County, you have to get rid of something."
 8 Q But you and Representative Dent didn't want King
 9 County; correct?
 10 A Correct.
 11 Q Okay. I might go a little bit more into that later,
 12 but I'm going to jump back into talking about your
 13 preparation for this deposition now.
 14 Have you had any written communications with anyone
 15 other than your attorneys to prepare for this deposition?
 16 A No.
 17 Q Did you review any documents in preparation for this
 18 deposition?
 19 A Yes.
 20 Q Which ones?
 21 A I don't -- My screen isn't on, so I don't know the
 22 name of them; but I think the original document -- I don't
 23 know exactly what it's called -- where we're part of the
 24 lawsuit now.
 25 And then -- I don't know what it's called without

6 (Pages 21 to 24)

Soto Palmer, et al. v. Hobbs, et al.
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State: Objection to
 lines 23:9-24 and
 24:2-10: hearsay.
 Neither Rep. Dent
 nor Mr. Graves are
 parties, so these are
 not admissible as
 statements of party-
 opponents. No other
 hearsay exemption
 applies.

Alex Ybarra

December 5, 2022

<p style="text-align: right;">Page 25</p> <p>1 looking at the document.</p> <p>2 Q Were they all sort of legal filings in this case?</p> <p>3 A Yes.</p> <p>4 Q Did you review any draft maps or maps in preparation</p> <p>5 for this deposition?</p> <p>6 A No.</p> <p>7 Q How about any communications that you've had or</p> <p>8 anything like that?</p> <p>9 A Communications, I'm not sure what you mean.</p> <p>10 Q Like copies of emails or text messages, things like</p> <p>11 that.</p> <p>12 A No.</p> <p>13 Q So those were specifically questions about in</p> <p>14 preparation for this deposition; but even if not in</p> <p>15 preparation for this deposition but just in general, have</p> <p>16 you reviewed any other documents filed in this case?</p> <p>17 A No.</p> <p>18 Q Have you seen --</p> <p>19 A I --</p> <p>20 Q Oh, go ahead.</p> <p>21 A I guess -- I guess I would tell you as the documents</p> <p>22 came in front of me, as when I first got on there was some</p> <p>23 documents that were sent to me that we were going to file;</p> <p>24 and I was asked to review those, so those were some</p> <p>25 documents that I looked at.</p>	<p style="text-align: right;">Page 26</p> <p>1 Q Okay. And were those sort of responses to questions</p> <p>2 that had been asked of parties and things like that?</p> <p>3 A Yes.</p> <p>4 Q Have you reviewed the Plaintiffs' Complaint in this</p> <p>5 case?</p> <p>6 A I think at the beginning, that first document.</p> <p>7 Q How about the Plaintiffs' Motion for Preliminary</p> <p>8 Injunction?</p> <p>9 A I don't know what that is, so I don't know.</p> <p>10 Q I don't blame you.</p> <p>11 Besides any meetings that we've already discussed,</p> <p>12 what else did you do to prepare for this deposition?</p> <p>13 A Nothing.</p> <p>14 Q How long in total do you think that you've spent</p> <p>15 preparing for this deposition?</p> <p>16 A One hour.</p> <p>17 Q And is that including the meeting time with your</p> <p>18 attorneys?</p> <p>19 A Yes.</p> <p>20 Q You talked earlier about some of the conversations</p> <p>21 that you've had about this lawsuit, and I just want to ask</p> <p>22 about a few more categories of people that you might have</p> <p>23 discussed it with, just to prompt your memory in case</p> <p>24 something else comes up.</p> <p>25 Have you discussed this lawsuit with any legislative</p>
<p style="text-align: right;">Page 27</p> <p>1 staff?</p> <p>2 A Yes.</p> <p>3 Q And who is that?</p> <p>4 A My legislative assistant.</p> <p>5 Q And what did you discuss about this case with your</p> <p>6 legislative assistant?</p> <p>7 A Well, we were talking about my schedule today, and</p> <p>8 we were discussing -- You know, she was mentioning we have</p> <p>9 other meetings. How long is this, whatever it is? And I</p> <p>10 said, "It's a deposition. I don't know how long it's</p> <p>11 going to last."</p> <p>12 So we were discussing the schedule for today and</p> <p>13 what we can leave on my calendar and what we can't leave</p> <p>14 on my calendar.</p> <p>15 Q Have you --</p> <p>16 A So I told her what we were -- what the deposition</p> <p>17 was about.</p> <p>18 Q Have you had any substantive conversations about</p> <p>19 this lawsuit with any legislative staff?</p> <p>20 A Not that I recall.</p> <p>21 Q Have you ever discussed this lawsuit with Tom Dent?</p> <p>22 A Yes.</p> <p>23 Q And how many times have you talked about this with</p> <p>24 him?</p> <p>25 A Once or twice.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q And what method of communication did you use, Zoom</p> <p>2 or in person, texting?</p> <p>3 A Both. Not texting, I don't think. We don't text</p> <p>4 much. In person. It was probably in person because I see</p> <p>5 him often in meetings.</p> <p>6 Q Have you had any emails with him about this lawsuit?</p> <p>7 A Not that I recall.</p> <p>8 Q Other than Representative Dent, was anyone else</p> <p>9 present for those conversations?</p> <p>10 A Not that I recall.</p> <p>11 Q How long would you say those conversations lasted?</p> <p>12 A About the lawsuit, five minutes.</p> <p>13 Q And what did you all discuss about the lawsuit?</p> <p>14 A What was the lawsuit about.</p> <p>15 Q And what did you say it was about?</p> <p>16 A Redistricting of the 13th and the 15th.</p> <p>17 Q Did Representative Dent have any opinions?</p> <p>18 A Yes. He didn't want to go to King County.</p> <p>19 Q And did you share any other opinions with him about</p> <p>20 the case?</p> <p>21 A Yes. I did not want to lose Lincoln County.</p> <p>22 Q And that was in the conversation about this lawsuit;</p> <p>23 is that correct?</p> <p>24 A I think we -- Mostly we discussed gaining King</p> <p>25 County and losing Lincoln County. We didn't discuss much</p>

Pls response:
Not hearsay
as opposing
party
statement;
803 exception
as present
sense
impression;
then-existing
mental
condition

7 (Pages 25 to 28)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 29	Page 30
<p>1 about Mattawa and that area because there wasn't -- It</p> <p>2 wasn't a big deal. We were more concerned about</p> <p>3 Lincoln and King -- going to King County and losing</p> <p>4 Lincoln.</p> <p>5 And Mattawa -- and all the other lines were just</p> <p>6 kind of here and there.</p> <p>7 Q And did you have any sense in that discussion or</p> <p>8 discuss how this lawsuit might impact your district?</p> <p>9 A No.</p> <p>10 Q Did Representative Dent have any thoughts about</p> <p>11 that?</p> <p>12 A Not that I recall.</p> <p>13 Q Did you talk about this lawsuit with any other</p> <p>14 representatives?</p> <p>15 A I think I mentioned that I'm part of this lawsuit.</p> <p>16 Q And with whom have you mentioned that?</p> <p>17 A I don't recall exactly who I mentioned it to; but</p> <p>18 because it was an issue that was happening for the 14th,</p> <p>19 the 15th, the 13th, and so there was a general discussion</p> <p>20 about, you know, "What did you gain? What did you lose?"</p> <p>21 What portions of the districts are you taking over, and</p> <p>22 what I'm taking over."</p> <p>23 And I'd get introduced to the new constituents in my</p> <p>24 area. For instance, I got a lot more of Yakima. So I</p> <p>25 didn't know the Yakima folks, so I was talking to the</p>	<p>1 representatives that represent those folks now and trying</p> <p>2 to see if -- you know, just trying to figure out what</p> <p>3 those folks need or may need in the future, and then --</p> <p>4 Yeah, so --</p> <p>5 Q Do you recall what you were told about what the</p> <p>6 folks in Yakima might need?</p> <p>7 A Well, I was just mostly worried about the district</p> <p>8 I'm taking over or the areas I'm taking over in Yakima,</p> <p>9 and just general stuff like, you know, do they need a new</p> <p>10 park? Do they have access to highways? Do they have</p> <p>11 issues with transportation? Do they have busing? The</p> <p>12 school districts. You know, what are they like? Things</p> <p>13 like that.</p> <p>14 Q And who did you talk to about that area?</p> <p>15 A I think I talked to Representative Chris Corry.</p> <p>16 Q Anyone else?</p> <p>17 A Not that I recall.</p> <p>18 The other representatives were not running. So the</p> <p>19 15th has new legislators in there; and so they were going</p> <p>20 away, so I didn't get a chance to talk to those folks. It</p> <p>21 didn't come up in the conversation because they were no</p> <p>22 longer going to be there.</p> <p>23 Q So you've mentioned a couple of times that you</p> <p>24 didn't want King County to be a part of your district.</p> <p>25 A (Nodded.)</p>
Page 31	Page 32
<p>1 Q Why is that?</p> <p>2 A Because my district at the -- Well, prior to this</p> <p>3 redistricting was rural Central Washington, and King</p> <p>4 County is not. It's a whole different type of folks out</p> <p>5 there.</p> <p>6 Q And why -- Please go ahead.</p> <p>7 A Because they're Western Washington folks, and</p> <p>8 they're not -- Most of them aren't farmers. Farmers or</p> <p>9 orchardists or farmworkers or -- You know, they -- You</p> <p>10 know, that's -- They're just -- You know, just not Eastern</p> <p>11 Washington rural folks, so --</p> <p>12 Q And why is it significant that they're not rural</p> <p>13 farmer/orchard types?</p> <p>14 A Because I think the things that I deal with as a</p> <p>15 representative in this district and I have, you know,</p> <p>16 prior to the redistricting, it had to do with farms and</p> <p>17 water, ag and energy, and King County doesn't deal in</p> <p>18 those issues.</p> <p>19 Like, you know, they don't have the same issues that</p> <p>20 we have, so that it opens up a whole new set of issues</p> <p>21 that I'm not -- I don't know what the issues are over</p> <p>22 there because I don't represent that area.</p> <p>23 I was pretty sure they don't have -- They would not</p> <p>24 have any wheat farms, they wouldn't have any corn fields;</p> <p>25 and they wouldn't have any orchards, and they wouldn't</p>	<p>1 have any grapes. So I knew if I moved to King County it</p> <p>2 would -- I would have to find out what those issues are in</p> <p>3 the King County area.</p> <p>4 Q And are you now having to do that?</p> <p>5 A No.</p> <p>6 Q Why not?</p> <p>7 A Because I never got King County. I went -- They --</p> <p>8 Lincoln County basically went away. Mattawa went</p> <p>9 away, but I gained a much larger part of Yakima County.</p> <p>10 Q Did you feel that the part of Lincoln that you lost</p> <p>11 had those sort of rural issues at the forefront?</p> <p>12 A Yes.</p> <p>13 Q How about Mattawa?</p> <p>14 A Yes.</p> <p>15 Q Do you feel that the parts you gained in Yakima have</p> <p>16 those rural issues at the forefront?</p> <p>17 A Yes.</p> <p>18 Q Okay.</p> <p>19 A Because we didn't get the City of Yakima or the City</p> <p>20 of Selah, which would have urban type issues. I now have</p> <p>21 rural Yakima County, parts of rural Yakima County.</p> <p>22 Q Okay. Switching gears a little bit, how did you</p> <p>23 come to be involved in this case, Representative Ybarra?</p> <p>24 A Well, I think it started when I asked</p> <p>25 Representative Stokesbary about what the lawsuit is about,</p>

8 (Pages 29 to 32)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

State: Object to lines 33:11-22: hearsay. Rep. Ybarra is describing a newspaper article. The Yakima Herald-Tribune (or whatever newspaper he read) is not a party to this case, and its articles are not present sense impressions or statements of then-existing mental conditions.

Pls response: Not hearsay as opposing party statement; 803 exception as present sense impression; then-existing mental condition

Page 33

1 and he explained the legal terminology of the lawsuit.
 2 And then I think I was asking more questions. When
 3 I found out a little bit more about the lawsuit I was
 4 asking him, you know, what -- I didn't understand what the
 5 lawsuit was, the original lawsuit was. I didn't
 6 understand what they were -- what the lawsuit was about.
 7 So I was trying to get more and more information, just
 8 because obviously it affected parts of my district. It
 9 affects my district, you know, because I got more of
 10 Yakima, and I got --
 11 You know, it didn't make a lot of sense for me
 12 because I live in Grant County. Mattawa, Schwana are part
 13 of "King" County. So I was trying to figure out why the
 14 redistricting folks would redistrict those guys out, and
 15 the lawsuit was kind of explaining -- Well, it seemed to
 16 me that the lawsuit was explaining that they wanted more
 17 Hispanics in the 15th.
 18 Q And so that's your understanding of why, for
 19 example, Mattawa was moved where it was; is that right?
 20 A I think that's what the newspaper said in Yakima.
 21 Q Is that your understanding as well?
 22 A I think so.
 23 Q And what are your thoughts on that?
 24 A I -- I guess my thoughts, I did not want to lose the
 25 folks of Mattawa and Schwana. I didn't want to lose those

Page 34

1 folks because I've been working -- I worked with -- I used
 2 to work with them, and I've been their representative for
 3 the last four years. So I didn't want to lose them, so --
 4 Q What outcome in this case do you think would solve
 5 your problems with the map?
 6 A I -- I don't -- I don't know. I don't know what is
 7 going to come out of this thing, so I don't know what
 8 the -- I don't know.
 9 Q So you mentioned that this whole thing kicked off
 10 when you approached Representative Stokesbary to ask some
 11 questions.
 12 Did someone recommend that you reach out to
 13 Representative Stokesbary?
 14 A No.
 15 Q What made you want to reach out to him?
 16 A Because I know he's a lawyer, and we've worked
 17 together for a couple years.
 18 Q And who first brought up the idea of you actually
 19 becoming a party in the case?
 20 A I think it was Representative Stokesbary.
 21 Q And how did that conversation go?
 22 MR. STOKESBARY: I'm just going to
 23 interject here and say that we object to the extent that
 24 this question asks for privileged communications between
 25 myself and Alex.

Page 35

1 So Alex, you can go ahead and talk about
 2 conversations we had before you agreed to be intervenor
 3 and before we signed an engagement letter, but I'm going
 4 to instruct you not to talk about conversations we had
 5 once you became a client of mine.
 6 THE WITNESS: (Nodded.)
 7 Q (By Ms. Leeper) Yes, so let me very clearly phrase
 8 my question. Before you became Representative
 9 Stokesbary's client but when you were having discussions
 10 about redistricting in this area, how did that
 11 conversation go?
 12 A I think he was explaining to me what the original
 13 lawsuit was and that some folks -- and I don't know who he
 14 was talking about, but he didn't agree, or the folks he
 15 represented -- I don't know -- but basically that they
 16 didn't agree with the lawsuit that was first put in by
 17 whoever put it in.
 18 Q Why did you decide to intervene in this lawsuit?
 19 A Why?
 20 Q Yes.
 21 A I -- I think it was unfair to the -- some of the
 22 folks that were redistricted out of my district.
 23 Q And what folks were those?
 24 A And if I remember correctly, in the newspaper
 25 article it said that -- something to the effect that

Page 36

1 the -- that they were trying to get more Hispanics, more
 2 Hispanic representation in Yakima County. And I said, "I
 3 represent Yakima County, parts of it." Maybe not all of
 4 it, but a piece of it.
 5 And so I was kind of not -- I was just thinking that
 6 I represent -- I'm a Hispanic. I'm Mexican American,
 7 Hispanic, whatever you want to call me; but I am one of
 8 those, and I represent folks in Yakima County -- in
 9 Yakima, parts of Yakima County, no matter the color.
 10 So I'm a Hispanic representative in Yakima, so why
 11 do you have a lawsuit that says that there's not enough
 12 Hispanic representation in Yakima County?
 13 Q Do you think that it's significant that you are a
 14 Mexican American representing other Mexican Americans?
 15 A No.
 16 Q Why not?
 17 A Personally, I just feel that if I have -- if I vote
 18 in a representative, no matter the color, no matter where
 19 they come from, no matter their religion, that they should
 20 represent everybody in their district, their constituents
 21 the same; and it shouldn't matter if I'm Hispanic or not.
 22 It helps sometimes with some of the issues.
 23 Q How so?
 24 A I know the language and the culture because that's
 25 what I am, and so I see the issues from a Hispanic lens

9 (Pages 33 to 36)

Alex Ybarra

December 5, 2022

<p style="text-align: right;">Page 37</p> <p>1 because that's what I am; and that sometimes makes a 2 difference. 3 Q How does it make a difference? 4 A Well, I get it. I get what they're talking about. 5 For instance, if, you know, the flour that's coming 6 in is a little bit different than the week before, then 7 they start making tortillas like my mom would and they 8 don't taste the same, then I'm going to say, "What the 9 heck is going on?" And I would understand because I eat 10 tortillas all the time, and something is wrong with the 11 flour. 12 But not a lot of Caucasians make their own tortillas 13 at home like my mom, and so they wouldn't have those types 14 of issues -- but I would. That's an example. 15 Q Are there any other examples you can think of where 16 having that language connection or that lens, as you put 17 it, has made a difference for you? 18 A I'm trying to think of an example. You know, I'm a 19 ranking on the education committee, and so there's always 20 issues. There's issues, especially in my district where 21 we have a lot of -- a large population of Hispanics in my 22 district, so I -- 23 For instance, in my school district, Quincy, there's 24 87 percent Hispanic; and so with Hispanics, if there's an 25 issue with some sort of race issues or anything or any</p>	<p style="text-align: right;">Page 38</p> <p>1 Hispanic issues -- and I went to Quincy High School. I 2 grew up here, so I understand where they come from. 3 So yeah, there's sometimes some issues with that -- 4 bilingual teaching, dual language, teachers of color, 5 teachers like the kids. And we don't have that many, so I 6 try to support that -- 7 Q Why do -- 8 A -- because I know how much it would help. 9 Q Why do you think that it would help to have more 10 teachers of color that are representative of the school 11 population? 12 A One, because the kids will have an example of that 13 they can make it, and they don't have to be farmworkers. 14 Two is many times Hispanic teachers will speak the 15 language, and I was an English as a second language 16 person, so I didn't really speak English until I was in 17 the third, fourth grade. 18 And I knew if I had a teacher that spoke my 19 language, then I would have excelled in school when I was 20 younger; but I did not excel until probably fourth or 21 fifth grade. And so I knew for me personally that if I 22 had a teacher who spoke Spanish, I would have done much 23 better in school in those early years. 24 Q And so obviously those were issues when you were 25 growing up.</p>
<p style="text-align: right;">Page 39</p> <p>1 A Yes. 2 Q Do those needs continue currently in your district? 3 A Yes. 4 Q How much would you say they're still prevalent? 5 A It depends on the school district. In my school 6 district -- 7 Hang on. I've got to turn off my phone really 8 quick. Hang on. 9 Q Thank you. 10 A Sorry about that. That's my second phone. I had 11 the other one muted, but not that one. 12 Q No worries. Thanks. 13 A So can you repeat the question, please? 14 Q Yes. I think you were telling me a bit about the 15 prevalence of the need for English as a Second Language 16 learning and things like that in different school 17 districts. 18 A Yes. Yes, it depends on the school district. 19 So in Quincy where we have 87 percent Hispanic, 20 Let's say in Lincoln County Davenport has maybe a 21 population of one or two, maybe ten students that speak 22 Spanish, so they won't have a huge need. But I have a 23 need here in Quincy because we have 87 percent Hispanic, 24 so the needs is -- It depends on the school district in 25 the area.</p>	<p style="text-align: right;">Page 40</p> <p>1 Q Is Mattawa one of those school districts where that 2 would be a prevalent issue? 3 A It is. 4 Q Do other Latino communities in the Southcentral 5 Washington area face similar issues regarding English 6 language learning? 7 A Yes. 8 Q Could you tell me a little bit about that in the 9 general area as well? 10 A Sure. It's basically what I just mentioned before. 11 You know, the kids, if they don't speak the English 12 language, then they struggle. 13 And so, you know, as a legislator my job is to try 14 to get more Spanish-speaking kids -- and again, in my 15 area -- into the schools so that the kids can excel as 16 much as possible. 17 Q You mentioned earlier farmworkers in relation to 18 this and the importance of having educators that are 19 Latino or Hispanic so that kids see that they can pursue 20 another profession other than farm working. 21 Are the majority of farmworkers Latino in the area? 22 A Yes. 23 Q Do they have any particular needs? 24 A Yes. 25 Q And what are those?</p>

10 (Pages 37 to 40)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 41	Page 42
<p>1 A Housing, health care, transportation, education.</p> <p>2 Q Is your lens as a Mexican American helpful in</p> <p>3 working with farmworkers on those issues?</p> <p>4 A I think so.</p> <p>5 Q How about your ability to speak Spanish?</p> <p>6 A Helpful at times.</p> <p>7 Q And how is it helpful?</p> <p>8 A Well, they -- If they have concerns and they bring</p> <p>9 them to me, they can say it in their language and not need</p> <p>10 a translator, and I can understand what they're saying.</p> <p>11 Q Okay. I keep getting off track because I keep</p> <p>12 having interesting conversations with you, but we're back</p> <p>13 to sort of talking about how you first got involved in</p> <p>14 this case.</p> <p>15 Did anyone in particular encourage you to intervene</p> <p>16 in this case?</p> <p>17 A No.</p> <p>18 Q Did you have any conversations with James or Jim</p> <p>19 Troyer about becoming involved in the case?</p> <p>20 A No.</p> <p>21 Q Have you had any conversations with Jim Troyer about</p> <p>22 this lawsuit?</p> <p>23 A Not that I recall.</p> <p>24 Q How about redistricting in general?</p> <p>25 A With Jim --</p>	<p>1 Q Yes.</p> <p>2 A -- Troyer? Not that I recall.</p> <p>3 Q Have you ever had any conversations about</p> <p>4 redistricting in Washington with Adam Kincaid?</p> <p>5 A Not -- I don't know who that is.</p> <p>6 Q How about Adam Foltz?</p> <p>7 A I don't know that person.</p> <p>8 Q You haven't talked to him then?</p> <p>9 A I -- I don't know who he is.</p> <p>10 Q You mentioned earlier that you were familiar with</p> <p>11 Representative Stokesbary prior to this case; is that</p> <p>12 right?</p> <p>13 A Yes.</p> <p>14 Q And how do you know him?</p> <p>15 A We are in the same caucus. He's a State Legislator,</p> <p>16 so we work together in the State Legislature.</p> <p>17 Q Are you familiar with an individual named José</p> <p>18 Trevino?</p> <p>19 A Well, I know more than a couple José Trevinos, but</p> <p>20 the one that's associated with this case is, I think, the</p> <p>21 mayor of Granger.</p> <p>22 Q And how do you know him?</p> <p>23 A Because he's mayor of Granger, and I do some work --</p> <p>24 The radio station in Granger is very popular in the</p> <p>25 Hispanic communities, and they're always trying to support</p>
Page 43	Page 44
<p>1 issues in the area. And so they'll call me every once in</p> <p>2 a while, and because that radio station is in Granger</p> <p>3 José is sometimes part of the discussions of the things</p> <p>4 they're trying -- the radio station is trying to do.</p> <p>5 Q Is than KDNA?</p> <p>6 A I think so.</p> <p>7 Q Is that Spanish language radio?</p> <p>8 A Yes.</p> <p>9 Q And what sorts of issues have you worked with them</p> <p>10 on?</p> <p>11 A I don't know their associations, but I know that</p> <p>12 they've asked me to support certain things that they're</p> <p>13 working on for their communities. And so sometimes I'll</p> <p>14 say yeah, if you want me to go to a meeting or do this or</p> <p>15 do that to show support, since I'm a State Legislator.</p> <p>16 Q And what sorts of things have you shown support for</p> <p>17 with them?</p> <p>18 A Let me see. One of the things that they're trying</p> <p>19 to do is what's called LEAP, L-E-A-P. I don't know what</p> <p>20 the acronym, what the acronyms are, but basically it's an</p> <p>21 education -- a nonprofit education group that helps Latino</p> <p>22 students in the high schools, helps them succeed.</p> <p>23 Q Is there anything else you remember being involved</p> <p>24 in with them?</p> <p>25 A Yes. I think they were working on a gang-related --</p>	<p>1 I don't know if it was a bill or a proviso. They were</p> <p>2 looking for funding for the prevention of gangs in Central</p> <p>3 Washington, and many of the gangs in Central Washington</p> <p>4 are Hispanic, mostly Hispanic members.</p> <p>5 Q And so is that an issue that you would identify as</p> <p>6 particularly impacting the Hispanic community?</p> <p>7 A I would say it's an issue in the Hispanic community.</p> <p>8 Q So it sounds like with Mayor Trevino that he's come</p> <p>9 up or maybe been at some of these events.</p> <p>10 Prior to the filing of this lawsuit had you had</p> <p>11 discussions directly with Mr. Trevino?</p> <p>12 A I think we met at a couple events before and talked</p> <p>13 to him on the phone a couple times.</p> <p>14 Q Did you ever discuss redistricting with him prior to</p> <p>15 the filing of this lawsuit?</p> <p>16 A I don't recall, but maybe. I just don't recall.</p> <p>17 Q Would those discussions have happened in person or</p> <p>18 maybe via email or text?</p> <p>19 A Probably we might have talked on the phone. I don't</p> <p>20 think I've ever been on a Zoom meeting with him, which is</p> <p>21 why I say it was probably a phone call, if we did at all.</p> <p>22 I just don't recall if I did talk to him.</p> <p>23 And it was -- I think it was mostly with this</p> <p>24 lawsuit if I would have called him, but I don't recall if</p> <p>25 I did or not.</p>

11 (Pages 41 to 44)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 45	Page 46
<p>1 Q Are you familiar with an individual named Ismael 2 Campos? 3 A I think I've met him before, but I don't know 4 exactly who he is. 5 Q When you say you think you've met him before, what 6 is your best recollection of that? 7 A His name sounds familiar. I think I've heard of his 8 name, so that's why I think I might have met him 9 somewhere; but I don't recall. I don't know what he does 10 or anything. 11 Q Okay. And do you ever recall having conversations 12 about redistricting with him? 13 A I don't ever remember talking to him. 14 Q Okay. Do you know any of the plaintiffs in this 15 lawsuit? And there's quite few of them, so I'm happy to 16 go down the list. 17 A Yeah, go down the list, because I don't know what 18 plaintiff -- You know, I don't know if Hobbs is -- 19 Secretary of State Hobbs, if he's a plaintiff. 20 Q He's a defendant. 21 A Okay. 22 Q So I'll go ahead and ask. Do you know Susan Soto 23 Palmer? 24 A No. 25 Q How about Alberto Isaac Macias?</p>	<p>1 A Not that I recall. 2 Q Fabiola Lopez? 3 A Not that I recall. 4 Q Caty Padilla? 5 A Nope. 6 Q Evangelina Aguilar? She also goes by Benji. 7 A She sounds familiar. Does she like work in Yakima 8 or -- I won't ask you any questions. You ask the 9 questions. I forgot my notes. 10 Q Benji Aguilar ran for office in LD 15. Do you know 11 if maybe you had contact with her in regards to that? 12 A No. 13 Q Do you know Lizette Parra? 14 A Not that I recall. 15 Q How about Heliodora Morfin? 16 A Doesn't sound familiar. 17 Q Are you familiar with an individual named Benancio 18 Garcia? 19 A I think he's the guy that was running for 20 Representative Newhouse's position, U.S. Congressman this 21 year. I -- I saw him at a debate. 22 Q Did you have any conversations with him? 23 A I did. 24 Q What did you all talk about? 25 A I just met him and just said, "You did fine during</p>
Page 47	Page 48
<p>1 the debate." 2 Q Did you support his candidacy? 3 A No. 4 Q Have you ever discussed redistricting with 5 Mr. Garcia? 6 A No. I just met him that one time and said hello. 7 Q Did you discuss this lawsuit with him? 8 A No. We just said hello. 9 Q Are you familiar with the Garcia v. Hobbs case? 10 A That's this one; right? 11 Q This one is Soto Palmer v. Hobbs. The Garcia v. 12 Hobbs case, maybe you don't know it by name, but are you 13 familiar with a case challenging LD 15 as a racial 14 gerrymander? 15 A I'm -- Yes. I know there's another lawsuit out 16 there. I don't know what it's called, but I know there's 17 another lawsuit. 18 Q And what do you know about that case? 19 A Not -- not much. I don't know -- I think this 20 lawsuit and that lawsuit I get mixed up as to what they're 21 about, so -- 22 Q And what's your understanding of what that lawsuit 23 is about? 24 A I don't know. I don't know, to tell you the truth, 25 so --</p>	<p>1 Q And what's your understanding of what this lawsuit 2 is about? 3 A I think this lawsuit is about that the folks that 4 filed the -- filed the lawsuit want more Hispanics in the 5 15th so they can -- Yeah, more Hispanics in the 15th, and 6 I don't want to move my lines and lose more of my district 7 if that's the case. 8 Q Have you ever discussed anything related to the 9 Garcia v. Hobbs case with Mr. Stokesbary? 10 MR. STOKESBARY: Again, Alex, to the extent 11 this question is asking you to talk about our privileged 12 communications, I'm going to instruct you not to answer 13 that, and for that reason object on the basis of 14 attorney-client privilege. 15 Q (By Ms. Leeper) Prior to Mr. Stokesbary's 16 representation of you did you ever discuss the Garcia v. 17 Hobbs case with him? 18 A Not that I recall. 19 Q Have you ever discussed that case with Jim Troyer? 20 A No. 21 Q How about anyone else? 22 A No. It was more that what's kind of happening for 23 me is like I knew there was a lawsuit, but then somebody 24 would mention, "You mean you're talking about something 25 else?" And I'm going, "There's another one?" It was</p>

12 (Pages 45 to 48)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 49

1 more like, "There's another lawsuit that does the same
2 thing, or what's the difference?"
3 And I don't remember what -- I don't recall what
4 they had told me what the difference is, other than they
5 were sort of similar.
6 Q Is there any reason that you would be unavailable
7 the weeks of May 1st and May 8th of 2023?
8 A I don't know what -- My calendar is down. Nothing
9 is open. So I would have to look to see if I'm available
10 or not.
11 Q Are you aware of any sort of big vacations you have
12 planned for the beginning of May next year?
13 A No.
14 MS. LEEPER: So I think this might actually
15 be a good time for us to take maybe a ten-minute break.
16 We've been going for a bit over an hour.
17 Does that work for you?
18 THE WITNESS: It does.
19 MS. LEEPER: Great. Let's hop off the
20 record.
21 THE WITNESS: Okay.
22 (Discussion off the record.)
23 (Break 10:10 a.m. to 10:19 a.m.)
24 MS. LEEPER: Let's get back on the record.
25 Q (By Ms. Leeper) Representative Ybarra, what do you

Page 51

1 A They're similar to where I live, very similar --
2 farm country, lots of Hispanics in the school districts,
3 similar issues.
4 Q Have you had any conversations with other
5 legislators about the Latino community in those areas?
6 A Concerning this matter, or anything?
7 Q Let's start in general, anything.
8 A Yes.
9 Q Who have you had those discussions with?
10 A Pretty much all the representatives and senators in
11 Central Washington.
12 Q How about zooming in on specifically talking about
13 how the Latino community in those areas would be impacted
14 by redistricting, have you had conversations about that
15 with any legislators?
16 A No, other than -- I'm trying to think if I talked to
17 anybody about it, but not that I recall about the question
18 you asked.
19 How would it affect the Hispanic community, is that
20 what you said?
21 Q Yeah.
22 A Not that I recall.
23 Q How about more generally, are you having any
24 recollection about discussions in those -- about those
25 areas?

Page 50

1 understand your role to be in this lawsuit?
2 A Explaining my position on the matter.
3 Q And what is your position on the map?
4 A My position is I'm -- I represent parts of Yakima
5 County, and those parts -- and I'm a Hispanic legislator,
6 and I don't understand what the lawsuit is trying to do if
7 I'm already a Hispanic legislator.
8 And I know other elected officials who are Hispanic
9 that represent Yakima County as well, and we just all seem
10 to be dismissed by this lawsuit, that we're not Hispanic
11 legislators or elected officials.
12 Q So is your position that you would like the map to
13 stay the way that it is right now?
14 A I'm fine with it.
15 Q Do you have any reason to believe that race was the
16 predominant factor in the drawing of Legislative District
17 15?
18 A Yes, I think so.
19 Q And what makes you think that?
20 A Because they grabbed Othello, Mattawa, Yakima, Selah
21 that have really high levels of Hispanic population.
22 Q Do you know anything in particular about the
23 Hispanic population in those areas?
24 A Yes.
25 Q What do you know about those groups?

Page 52

1 A Yes.
2 Q Could you explain more about that?
3 A Sure. Again, I think I mentioned earlier that I
4 talked to Representative Corry about the areas that I now
5 have in the 13th that he represented in the 15th, and
6 discussed some of the issues that were -- that I might
7 wind up having to look at in support or help with in the
8 future.
9 Q Do you understand your role as a party in this
10 lawsuit to have changed at all since you first became
11 involved as an intervenor?
12 A State that again, please.
13 Q Yeah. Do you understand your role in this lawsuit
14 to have changed at all since you first became involved as
15 an intervenor in the case?
16 A No.
17 Q Representative Ybarra, let's talk a little bit about
18 your educational and work background.
19 Where did you go to high school?
20 A Quincy High School, Quincy, Washington -- the
21 Jackrabbits.
22 Q And were you born and raised in Quincy?
23 A I was.
24 Q And you still live in Quincy; right?
25 A I do.

State:
Objection to
50:15-51:3 -
lack of
foundation.
Rep. Ybarra
was not
involved in
the
Commission
process, and
has no
foundation to
testify about
the
Commissione
rs'
decisionmaki
ng.

Foundation
exists based
on Repre-
sentative
Ybarra's
conversations
regarding the
redistricting
process and
his personal
and profes-
sional
experience
representing,
campaigning,
and living in
the Othello,
Mattawa,
Yakima, and
Selah areas

13 (Pages 49 to 52)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 53	Page 54
<p>1 Q Have you lived anywhere else --</p> <p>2 A Yes.</p> <p>3 Q -- in Washington?</p> <p>4 A Yes.</p> <p>5 Q Whereabouts?</p> <p>6 A When I was going to school I lived in Spokane as</p> <p>7 well as Ellensburg. When I graduated from college I lived</p> <p>8 in Kirkland, Washington, and then moved to outside Duvall,</p> <p>9 Washington, and then to Snoqualmie Ridge, and then moved</p> <p>10 back home to Quincy.</p> <p>11 Q And how long about would you say you were out of</p> <p>12 Quincy in your life?</p> <p>13 A Fifteen years.</p> <p>14 Q And I know this is an impolite question, but how old</p> <p>15 are you?</p> <p>16 A Sixty-one.</p> <p>17 Q Where did you go to college?</p> <p>18 A I graduated from Central.</p> <p>19 Q And what do you have a degree in?</p> <p>20 A Mathematics.</p> <p>21 Q Do you have any postgraduate degrees?</p> <p>22 A I do. I've got an MBA, University of Phoenix.</p> <p>23 Q And what industries have you worked in since you</p> <p>24 graduated college?</p> <p>25 A My first company -- The company I first worked with,</p>	<p>1 Rocket Research Company in Redmond, Washington, I worked</p> <p>2 there for about 15 or so years. It was aerospace. We --</p> <p>3 Mostly space. We made rocket engines for spacecraft and</p> <p>4 satellites and worked on space shuttles and B-1 Bombers</p> <p>5 and F-16s and -- You know, our engines were on every --</p> <p>6 every spacecraft that went to different planets, so --</p> <p>7 Q Very cool.</p> <p>8 A It was cool.</p> <p>9 And then I moved back home to Quincy and worked for</p> <p>10 Grant County PUD for the next 16 or 17 years.</p> <p>11 Q And what is PUD short for?</p> <p>12 A Public Utility District. It's a utility, like a</p> <p>13 utility.</p> <p>14 Q Okay. What is your current job?</p> <p>15 A I work part-time. Well, my current job is a State</p> <p>16 Legislator, and I also have a part-time job working for a</p> <p>17 company called the Center for -- Gosh, Center for</p> <p>18 Sustainable Infrastructure --</p> <p>19 Q And what do you --</p> <p>20 A -- in Olympia.</p> <p>21 Q And what do you do there?</p> <p>22 A They wanted a presence in Eastern Washington since</p> <p>23 they're located in Olympia, and so I -- We help them find</p> <p>24 folks that they can potentially help.</p> <p>25 And they basically do wastewater, water treatment</p>
Page 55	Page 56
<p>1 plants, ag symbiosis, industrial symbiosis work.</p> <p>2 Q You've been appointed to public office or positions;</p> <p>3 right?</p> <p>4 A I was appointed my first year, yes.</p> <p>5 Q And that's your first year in which role?</p> <p>6 A As a State Legislator.</p> <p>7 Q And what was that appointment process?</p> <p>8 A The legislator that was -- that left the seat,</p> <p>9 they -- It had to be filled, and so there was some folks</p> <p>10 that put their names in the hat; and we went through, you</p> <p>11 know, the process of meeting with a lot of folks in</p> <p>12 different counties that we would represent. And then we</p> <p>13 were voted on, and I got lucky enough to be voted in.</p> <p>14 Q And when was that?</p> <p>15 A 2018, the last quarter of 2018 and the beginning of</p> <p>16 2019.</p> <p>17 Q And then you had to run to stay in that position; is</p> <p>18 that right?</p> <p>19 A Yes.</p> <p>20 Q Do you think it was helpful to have been appointed</p> <p>21 when you were running for office?</p> <p>22 A Yes.</p> <p>23 Q How so?</p> <p>24 A People -- More people knew my name.</p> <p>25 Q And that name recognition helped you in your</p>	<p>1 campaign?</p> <p>2 A Yes. I think it helps all incumbents.</p> <p>3 Q Have you run for any other elected offices?</p> <p>4 A Yes.</p> <p>5 Q What are those?</p> <p>6 A The Quincy school board. I was a school board</p> <p>7 director for nine years.</p> <p>8 Q So for nine years. How many different times did you</p> <p>9 run for that position?</p> <p>10 A Oh, gosh. Two to three times. I think three times,</p> <p>11 maybe four times. I don't recall off the top of my head.</p> <p>12 Q Were you opposed in those races?</p> <p>13 A No.</p> <p>14 Q How about when you ran in 2019 for LD 15, were you</p> <p>15 opposed?</p> <p>16 A Yes.</p> <p>17 Q Who was your opponent?</p> <p>18 A Oh, gosh, good question. He was the Democratic</p> <p>19 party chair in Kittitas County. I don't recall his name</p> <p>20 off the top of my head. If I do recall it, I'll mention</p> <p>21 it.</p> <p>22 I could look it up, but you said not to, so --</p> <p>23 Q No, don't worry. If you can't remember it, no</p> <p>24 sweat. Thanks.</p> <p>25 When you were running for Quincy school board did</p>

14 (Pages 53 to 56)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 57	Page 58
<p>1 you in any of your races receive endorsements?</p> <p>2 A No.</p> <p>3 Q How about when you were running for LD 15? Excuse</p> <p>4 me, 13.</p> <p>5 A Thirteen?</p> <p>6 Q Yes.</p> <p>7 A Yes.</p> <p>8 Q What endorsements have you received?</p> <p>9 A Well, there's -- I don't recall because there's like</p> <p>10 ten or 12 that we get yearly, so -- And they change from</p> <p>11 year to year.</p> <p>12 Q Have you received endorsements from other</p> <p>13 legislators?</p> <p>14 A Maybe that first race because I was running against</p> <p>15 somebody, but I don't recall who would have done it; but I</p> <p>16 think I did from other legislators.</p> <p>17 Q Okay. How about since then, have you been opposed?</p> <p>18 A No.</p> <p>19 Q Have you received any endorsements from Latino</p> <p>20 community groups?</p> <p>21 A Not -- not that I recall.</p> <p>22 Q Have you sought any endorsements from Latino</p> <p>23 community groups?</p> <p>24 A No.</p> <p>25 Q You mentioned earlier that you've done some work</p>	<p>1 with KDNA. When you were running for office have you made</p> <p>2 any appearances on KDNA in connection with your campaign?</p> <p>3 A No, not -- not connected with the campaign.</p> <p>4 Q Okay. How about any other Spanish language radio or</p> <p>5 TV?</p> <p>6 A Yes. I went down to Tri-Cities, Kennewick. There's</p> <p>7 a Spanish-speaking radio down there.</p> <p>8 Q Okay.</p> <p>9 A So I was on -- interviewed a couple times down</p> <p>10 there.</p> <p>11 Q Have you when you're running for office in general</p> <p>12 sought endorsements from any groups?</p> <p>13 A No. I guess the way it kind of works is a little</p> <p>14 bit not like that, I guess. I guess if I wanted an</p> <p>15 endorsement or somebody's support, sometimes there's --</p> <p>16 We'll get questionnaires that we fill out to see if they</p> <p>17 want to support us or not. And sometimes they just show</p> <p>18 up in the mail and say, "We endorse you," so --</p> <p>19 But I've never gone out and asked for endorsements</p> <p>20 to the best that I recall.</p> <p>21 Q And why is that?</p> <p>22 A Because the first time I ran against somebody I</p> <p>23 didn't know how the process worked, so I didn't know to do</p> <p>24 that. And then after that I've always ran unopposed, so</p> <p>25 never really needed to seek out endorsements.</p>
Page 59	Page 60
<p>1 Q If you're running opposed, how would that change</p> <p>2 your approach to how you run for office?</p> <p>3 A I would be putting more signs out, so -- and</p> <p>4 probably making more appearances, so --</p> <p>5 Q Would it change the cost of your campaign at all?</p> <p>6 A I don't know.</p> <p>7 Q Okay. Are you a part of any community groups or</p> <p>8 societies?</p> <p>9 A Rotary in Quincy.</p> <p>10 Q Anything else?</p> <p>11 A No. I think that's about it, so -- Yeah.</p> <p>12 Q What do you know about the demographics of</p> <p>13 Southcentral Washington?</p> <p>14 A Lots of Hispanics, not a lot of Blacks, not a lot of</p> <p>15 other races.</p> <p>16 And you're -- And again, to make sure I know the</p> <p>17 definition of Southcentral Washington, Grant County,</p> <p>18 Yakima County. Not Kittitas County; right?</p> <p>19 Q Not Kittitas, but yes to Pasco, Benton.</p> <p>20 A Oh, Tri-Cities. So the Tri-Cities up through Yakima</p> <p>21 County and Grant County?</p> <p>22 Q Yes, sir.</p> <p>23 A Okay. Demographics, most -- probably I'd say</p> <p>24 40 percent Hispanic, maybe 30 percent. I don't know what</p> <p>25 the number is across that area. Mostly everybody else is</p>	<p>1 Caucasian. Yeah, so --</p> <p>2 Q So I'm going to break it down into its subparts.</p> <p>3 A Sure.</p> <p>4 Q So do you know how much of the population in Yakima</p> <p>5 County is Latino?</p> <p>6 A Not off the top of my head. Fifty? I'm guessing.</p> <p>7 Q How about Pasco?</p> <p>8 A I don't know. I really don't, to tell you the</p> <p>9 truth. I think it's just generally about 40 percent in</p> <p>10 those areas.</p> <p>11 Q What about Benton County?</p> <p>12 A So Benton, what towns are in Benton County?</p> <p>13 Q You're exposing the fact that I am not from</p> <p>14 Washington, Representative Ybarra.</p> <p>15 A Okay. Well, and the reason I ask is because I know</p> <p>16 the cities, so if it's -- Let's say if it's Pasco I know</p> <p>17 there's a lot more Hispanics there than there is in</p> <p>18 Kennewick.</p> <p>19 But Benton County, I -- I still don't know which</p> <p>20 towns are there, and so that's why I'm kind of not -- I'm</p> <p>21 not not trying to answer your question.</p> <p>22 Q No worries at all.</p> <p>23 How about Franklin County?</p> <p>24 A Same deal. It's Franklin is Tri-Cities, I think,</p> <p>25 but I don't know for sure. But if Franklin -- if Franklin</p>

15 (Pages 57 to 60)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 61	Page 62
<p>1 is -- I think it's Pasco, I think, but I don't know for 2 sure. 3 So I better not answer that one because I just don't 4 know. 5 Q What about Adams County? 6 A Oh, Adams County -- Yeah. So I think Othello is in 7 Grant or Adams; but Othello is right next to Adams, but 8 mostly Adams is -- to the best of my knowledge is wheat 9 country, so not a lot of Hispanics out there. Mostly 10 Caucasian out there. 11 Other than the closer you get to Othello, the more 12 Hispanics you're going to get in there. That's what the 13 "Democrats" -- the demographics look like, I think. 14 Q And what about Grant County? 15 A Grant County, I think we're probably about, I think, 16 40 percent Hispanic -- maybe not that much 35, 30, and the 17 rest Caucasian. 18 Q Okay. So I'm going to zoom in. You mentioned that 19 sort of the cities are what you know; and you might have 20 already answered some of these, but I'm just going to ask 21 about some specific cities. 22 So what do you know about the Latino population in 23 Pasco, the city? 24 A Yeah, there's a lot of them there. There's 35, 25 40 percent, I'm guessing.</p>	<p>1 Q How about Kennewick? 2 A Less in Kennewick, less Hispanics. I mean 3 proportionately. So like Pasco -- I don't think Pasco is 4 as big as Kennewick, so Kennewick has -- I think it has 5 more people and so there's a lot -- There's less Hispanics 6 in Kennewick, to the best of my knowledge. 7 Q And lastly, what about Richland? 8 A Richland, probably the least amount of Hispanics in 9 Richland compared to those other cities of the 10 Tri-Cities -- I think. 11 Q Okay. So we've been talking about sort of 12 population of Latinos in general. Do you know anything 13 specific about the voting age population in Southcentral 14 Washington? 15 A For everybody? 16 Q In general. 17 A In general? Well, older folks vote more than 18 younger folks. 19 Q And what about specifically the voting age 20 population of the Latino community in Southcentral 21 Washington? 22 A Not a lot of Hispanics vote, a very small 23 percentage. 24 Q And is that in comparison to White voters, you're 25 saying?</p>
Page 63	Page 64
<p>1 A Yes. Well, like White or Black, or whatever. We 2 just -- Hispanics just don't do a lot of voting, and 3 because most of them were brought up because they were 4 migrant workers. 5 And so if you're in Quincy, work here for three 6 months and then you leave to Idaho, work there for three 7 months, and then you go somewhere else for three months, 8 most migrant workers don't care who the mayor is and who 9 the city council person is because they're not there long 10 enough to care. They care about having their home, having 11 a job, feeding their kids, a good school for the kids and 12 stuff like that. 13 So they're not really worried about elections, so 14 because of that they have never really been brought up to 15 be voters in a particular area. 16 Q Is there anything else that you are aware of that 17 might contribute to lower voter turnout among Latinos? 18 A Just lack of knowledge of the candidates, who the 19 candidates are. 20 Q And is there any reason why they would have that 21 lack of knowledge? 22 A Because they don't know who they are. 23 Q Okay. 24 A Can I give you an example? 25 Q Please do.</p>	<p>1 A I went to my mom's house. She said, "Alex, I don't 2 know how to fill out my ballot." 3 I said, "Okay, Mom, so let's look at the mayor of 4 Quincy." She goes, "Well, I don't know those guys." And 5 I said, "Well, you know who that guy is." She goes, "No." 6 I said, "Well, you know Mr. Worley who used to -- you and 7 Dad used to know really well, this is his son." And she 8 would say, "Oh, I'll vote for him." And I said, "Okay." 9 And she said, "Who's this other guy?" And I said, 10 "That's So-and-So." And I would explain who these people 11 are, and then she would have knowledge of these people; 12 and she could make up her own mind as to who she voted 13 for. I just needed to explain to her who these folks 14 were. 15 Q Do you think that language access plays any role in 16 a lower voter turnout among Latinos? 17 A Language access? A little bit. 18 Q How so? 19 A Well, if the voter pamphlets are all in English, 20 then Hispanics, the Spanish-speaking people that don't 21 know how to read in English can't read them. 22 Yeah, so I mean just in general, just a lack of 23 language, so -- 24 Q Okay. So that was a discussion about voting age 25 population. We've got one more term, which is</p>

16 (Pages 61 to 64)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 65	Page 66
<p>1 specifically citizen voting age population.</p> <p>2 A Okay.</p> <p>3 Q What do you know about the population, the citizen</p> <p>4 voting age population of Latinos in Southcentral</p> <p>5 Washington?</p> <p>6 A Citizen voting age. So I would -- Citizen. So</p> <p>7 you're not talking about the undocumented; right?</p> <p>8 Q That correct.</p> <p>9 A Is that -- You're trying to make sure that you don't</p> <p>10 count those guys in?</p> <p>11 Yeah. Well, no undocumented will vote, so then the</p> <p>12 population goes down. I would say of all the Hispanics in</p> <p>13 Central Washington that you defined, I'd say a good 25</p> <p>14 percent -- and nobody is ever going to know -- are</p> <p>15 probably undocumented, maybe more, maybe 40 percent.</p> <p>16 So that's another reason why we have low voter</p> <p>17 turnout in the Hispanic population because 30, 40 percent</p> <p>18 of the Hispanics may be undocumented -- are probably</p> <p>19 undocumented, and so they won't ever vote, so --</p> <p>20 Q Are you aware of how the demographics in</p> <p>21 Southcentral Washington have shifted in the last decade?</p> <p>22 A I don't think they've shifted much. I think there</p> <p>23 may be more Hispanics here.</p> <p>24 Q And what's your basis for that information?</p> <p>25 A Because I go through town, and there's just more</p>	<p>1 Brown people around. So pretty much in all the towns, and</p> <p>2 mostly it's due to crops. It's due to orchards.</p> <p>3 In Quincy we have -- in the old days we had row</p> <p>4 crops, and you only need farmworkers in row crops for</p> <p>5 three or four months out of the year. But as orchards</p> <p>6 have crept into my -- in different areas, like Grant</p> <p>7 County, Yakima County, as well as grapes, they need</p> <p>8 year-around labor; and because of that Hispanics tend to</p> <p>9 stay in the communities where they're working rather than</p> <p>10 move on to the next place that has jobs available.</p> <p>11 Q So you mentioned earlier that there's a history of</p> <p>12 sort of the migrant population being more transient and</p> <p>13 moving, you know, three months in this place, three months</p> <p>14 in that place.</p> <p>15 Is it your understanding that that then now is</p> <p>16 decreasing and that there's more Latino farmworkers that</p> <p>17 are staying for longer periods in the region?</p> <p>18 A No, I would say that there's still a migrant</p> <p>19 population, a large one, that do exactly what used to</p> <p>20 happen in the past. There's just more work.</p> <p>21 Q Okay.</p> <p>22 A There's more orchards, more grapes, more row crops.</p> <p>23 There's more farms, so --</p> <p>24 Q Got it. Do you have any knowledge about the voting</p> <p>25 patterns of Latino voters in the state of Washington?</p>
Page 67	Page 68
<p>1 A Not really. Not really because we just don't vote a</p> <p>2 lot, Hispanics in general.</p> <p>3 Q How about specifically do you have any knowledge of</p> <p>4 the voting patterns of Latino voters in Southcentral</p> <p>5 Washington?</p> <p>6 A I can tell you mostly about Grant, and I think in</p> <p>7 Grant Hispanics probably vote conservatively, for</p> <p>8 conservative leaders. Because I'd say a large population</p> <p>9 of Hispanics around here are conservative, so they'll vote</p> <p>10 for conservative candidates.</p> <p>11 Q And what are you basing your understanding of that</p> <p>12 on?</p> <p>13 A Because who wins.</p> <p>14 Q Do you have any knowledge about the voting patterns</p> <p>15 of Latino voters in other parts of Southcentral</p> <p>16 Washington, like maybe more in the Yakima City area?</p> <p>17 A Well, that's -- Not really, because they redid their</p> <p>18 districting in the city limits for the county, so it's</p> <p>19 what used to be a regular election is no longer a regular</p> <p>20 election because of the way they do it now.</p> <p>21 They've been changing it over the last it seems like</p> <p>22 ten years or 15 years because there was a lawsuit that</p> <p>23 happened, I think; and they had to redistrict, and then</p> <p>24 the people that live in the district vote in that</p> <p>25 district. And I think prior to that it was the whole town</p>	<p>1 votes or the whole city votes for everybody in all the</p> <p>2 districts, so it was a little bit different.</p> <p>3 So the patterns kind of changed because of that in</p> <p>4 the Yakima area.</p> <p>5 Q So what else do you know about sort of that lawsuit</p> <p>6 and those changes in the Yakima City area?</p> <p>7 A Pretty much what I just stated, so --</p> <p>8 Q Are you aware of any other -- any shifts in the</p> <p>9 Yakima County Commission elections?</p> <p>10 A I'm not. And I don't know if that lawsuit was for</p> <p>11 the entire Yakima County or just the City of Yakima, so</p> <p>12 that's why I'm not that familiar if things have changed or</p> <p>13 not.</p> <p>14 Q Okay. And do you know what the basis of that</p> <p>15 lawsuit was?</p> <p>16 A According to the papers that I read, it had to do</p> <p>17 with not a lot of Latinos were getting elected to office</p> <p>18 in Yakima, and it was because of the way the voting was</p> <p>19 done.</p> <p>20 Again, there was like four or five precincts -- or I</p> <p>21 don't know how many. And then the way the end vote</p> <p>22 changed, it would -- the people that live in a particular</p> <p>23 district would be the only ones that would vote for that</p> <p>24 particular person in that particular area, so --</p> <p>25 So I think that's what the outcome was, so -- That</p>

17 (Pages 65 to 68)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

<p style="text-align: right;">Page 69</p> <p>1 was -- I don't know -- 10, 20 years ago, something like 2 that. 3 Q Do you have any thoughts about the outcome of that 4 lawsuit? 5 A No. I think -- I think everybody -- Everybody's 6 areas where they vote and stuff is very particular to your 7 area, your county, your city. 8 And so I, you know, don't know enough about Yakima 9 and don't live down there to, you know, weigh in there 10 just because it's not my community. 11 Q Um-hmm. 12 A At least it wasn't before I was an elected official. 13 Q Would you say that the Latinos in Grant County have 14 common interests with the Latinos down in Yakima? 15 A Yes. 16 Q What would you say those are? 17 A Well, food, culture, language. The types of jobs we 18 have, mostly manual labor. They're from -- Most of them 19 are from the same country, Mexico -- most of them, or 20 Texas. So yeah, lots of things in common. 21 Q And would you say that those commonalities among the 22 Latino community exist in all of Southcentral Washington 23 as I've defined it? 24 A Yes. 25 Q Okay. So that would include the Latinos in Pasco</p>	<p style="text-align: right;">Page 70</p> <p>1 and Yakima? 2 A Yes. 3 Q Have you studied any election returns in 4 Southcentral Washington to see the voting patterns of 5 Latino voters? 6 A Yes. 7 Q What election returns have you looked at? 8 A One that had Alex Ybarra on it, and I wanted to know 9 how many Latino people voted for me. I wanted to know, 10 you know, who was voting for me and who wasn't. 11 Q And how did you get access to that information? 12 A Went to the county courthouse. The Assessor's 13 Office has those on record, and so I asked for those 14 records. 15 Yeah, I think it was Assessor's, yeah -- Assessor's 16 Office? Yeah. Or Auditor's? Yeah, whoever does the 17 elections in the county courthouse, that's where I went. 18 Q And to your understanding those election results 19 were broken down by race? 20 A Well, they broke -- Okay. So I'm a statistician, 21 data analyst, so I get the Excel spreadsheets of everybody 22 that voted. I saw who voted. I broke it up by precinct, 23 and then I -- Because I really well -- I'm really good at 24 Excel, I looked up anybody that had a Spanish surname. I 25 presumed that they were Latino, and just looked to see who</p>
<p style="text-align: right;">Page 71</p> <p>1 voted and who didn't vote. 2 Q Okay. And so you broke it down by precinct and 3 looked at sort of the more Latino precincts and looked at 4 how they voted. 5 Is that how you did it? 6 A Well, not the precincts. The actual voters, no 7 matter where they lived. 8 Q Okay. And what was sort of the results that you 9 observed from doing this Excel calculation? 10 A Most of them didn't vote. Like a good -- We had 11 maybe 25 percent vote, maybe. 12 Q Have you talked with anyone about voting patterns of 13 Latino voters in Southcentral Washington? 14 A Yeah, because, you know, just in general, just 15 because Yakima has been a big issue, you know, in the area 16 about how -- you know, the claim that Latinos aren't 17 getting represented in Yakima, that's a big issue for 18 Central Washington. 19 Q And who have you talked about that with? 20 A Just in general everybody. I talked to my mom about 21 it. I talked to my dad about it, brothers, other Latino 22 leaders. You know, friends of mine that, you know, we 23 discussed -- you know, just general discussions about, you 24 know, what's going on down in Yakima. 25 Q How about other state legislators?</p>	<p style="text-align: right;">Page 72</p> <p>1 A Yeah, I think I generally discussed it to like our 2 caucus and just basically just say Latinos just don't vote 3 for these particular reasons, and -- But it depends where 4 you're sitting as to whether they're going to vote a 5 certain way, and I just give them my opinions. 6 Q And what are your opinions? 7 A That Hispanics don't vote. 8 Q Do you have any opinions about if Latino people when 9 they do vote vote a particular way? 10 A I think -- I think Latino voters, like any other 11 voters they're going to vote for who they know, who they 12 like in most cases. 13 For instance, we had a mayor's race in Quincy, and 14 there was a Latino in the mayor's race. And there was a 15 little backlash from the Hispanics that said, "Well, he 16 didn't make it to the primary. There was two Caucasians 17 that won." And I said, "Well, it's because nobody likes 18 that guy. Nobody likes that Latino that was on the -- 19 that was on the ballot, and so nobody voted for him 20 because nobody liked him." I mean, just in general. 21 And so it wasn't an -- It wasn't an issue. It was 22 just that, a likeable thing. And again, in small 23 communities like mine it's easy to know who people are, 24 and just in general people will like them or not like them 25 in small communities.</p>

18 (Pages 69 to 72)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 73	Page 74
<p>1 In larger communities it's a lot different, but in</p> <p>2 my smaller communities that's kind of how it is, so --</p> <p>3 Q Do you have any opinion about when Latino people do</p> <p>4 vote, if they tend to vote to prefer one party over</p> <p>5 another party?</p> <p>6 A It depends on the community. Again, I think in the</p> <p>7 larger cities and stuff that maybe -- it might be like</p> <p>8 that; but I know in my community when people know each</p> <p>9 other we're going to vote for the people we like, and it</p> <p>10 doesn't matter the party -- Latino voters as well.</p> <p>11 And I think in the bigger cities where there's --</p> <p>12 there isn't this, "I know Jim," or, "I know Bob, or Suzy.</p> <p>13 I'm going to vote for them because they're my friends; and</p> <p>14 we talk to our friends, and they vote that way."</p> <p>15 I think it's a lot different types of elections that</p> <p>16 happen in bigger cities.</p> <p>17 Q Okay. And so you say that you've viewed your race</p> <p>18 broken down. You did that calculation yourself for your</p> <p>19 elections, --</p> <p>20 A Yes.</p> <p>21 Q -- looking at how they would break down by race</p> <p>22 using Spanish surname.</p> <p>23 Have you seen analyses like that for any other</p> <p>24 elections happening in LD 13?</p> <p>25 A No, because I haven't looked. You know, and again I</p>	<p>1 haven't looked because I only did that one race that I was</p> <p>2 running against one person. That's the only race I've</p> <p>3 had, so I haven't gone into the depth that I did for my</p> <p>4 original race --</p> <p>5 Q And that was --</p> <p>6 A -- where I had somebody against me.</p> <p>7 Q And that was the 2019 race; is that right?</p> <p>8 A Yes. November, 2019.</p> <p>9 Q Have you seen any election returns broken down by</p> <p>10 race for any other districts?</p> <p>11 A Yes. I don't recall any of the details of them, but</p> <p>12 yes, I have.</p> <p>13 Q Which districts were those?</p> <p>14 A Well, they've got, you know, certain people,</p> <p>15 databases have different versions of them. So if you want</p> <p>16 to look in King County, there's folks that do that kind of</p> <p>17 analysis and stuff.</p> <p>18 But I kind of looked at my district and my counties</p> <p>19 where I represent folks, and then looked at those and</p> <p>20 looked at the patterns to make sure I understood where I</p> <p>21 needed to put my signs and who I needed to talk to to make</p> <p>22 sure I get it -- I was like, you know, to come in.</p> <p>23 Q Have you looked at any election returns broken down</p> <p>24 by race for LD 15?</p> <p>25 A I did because when the -- when the lawsuit came out,</p>
Page 75	Page 76
<p>1 then people started printing -- I think even in the</p> <p>2 newspaper, if I'm not mistaken, they started printing</p> <p>3 about in LD 15 how many Latino voters there were, how many</p> <p>4 were voting, where they lived and those kind of things.</p> <p>5 So I saw just a general -- a general representation of</p> <p>6 what the numbers looked like.</p> <p>7 Q And those are sort of representations you're saying</p> <p>8 you saw in news articles?</p> <p>9 A If I remember correctly, yes.</p> <p>10 Q Okay. Do you know what ecological regression is?</p> <p>11 A No.</p> <p>12 Q How about ecological inference?</p> <p>13 A Nope.</p> <p>14 Q Have you studied any opinion polls focused on Latino</p> <p>15 voters in Southcentral Washington or Washington more</p> <p>16 broadly?</p> <p>17 A Not that I recall.</p> <p>18 Q Do you know what the term racially polarized voting</p> <p>19 means?</p> <p>20 A No.</p> <p>21 Q Have you ever viewed election results broken down to</p> <p>22 show the preferences of White voters?</p> <p>23 A Just generally Democrat, Republican.</p> <p>24 Q And what have you learned about that?</p> <p>25 A Not so much Whites, but more just in general across</p>	<p>1 the board how many Democrats vote -- or what the</p> <p>2 Democratic votes look like and what the Republican -- you</p> <p>3 know, the differences between those two.</p> <p>4 And what I learned is that the more conservative</p> <p>5 folks that run for office usually win in Central</p> <p>6 Washington.</p> <p>7 Q Do you have any knowledge about whether Latino</p> <p>8 voters and White voters tend to prefer the same candidates</p> <p>9 or different candidates for state legislative races in</p> <p>10 Southcentral Washington?</p> <p>11 A I -- I don't -- I don't think there's a</p> <p>12 difference -- I think it's just a likability thing. I</p> <p>13 think a lot of folks --</p> <p>14 For instance, I'll give you an example. Bruce</p> <p>15 Chandler, I'm sure everybody loves Bruce, and he gets</p> <p>16 voted in every year; and he's a great guy, so I think</p> <p>17 people know that. They vote for Bruce.</p> <p>18 And I don't think -- I think -- I'd like to hope</p> <p>19 that the best candidate wins.</p> <p>20 Q And are you basing that opinion on any sorts of</p> <p>21 facts or data?</p> <p>22 A Well, I got elected, and I'm Hispanic. And I live</p> <p>23 in this area, and I'm conservative. And I think I got</p> <p>24 voted in because I'm conservative, even though I'm</p> <p>25 Hispanic, so --</p>

19 (Pages 73 to 76)

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 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

<p style="text-align: right;">Page 77</p> <p>1 Q Okay. Could you tell me what you know about the</p> <p>2 process of redistricting in general?</p> <p>3 A Just in general, there's a law or -- a law out there</p> <p>4 that says you shall get two Republicans, two Democrats are</p> <p>5 part of the team. They're going to hire a chairman or</p> <p>6 chairwoman to run the group.</p> <p>7 And then these four folks get some staff to help</p> <p>8 them draw the lines. They get software, and then they</p> <p>9 start drawing the lines to make sure they have the same</p> <p>10 amount of people in each district.</p> <p>11 Q Do you know anything in particular about the process</p> <p>12 of redistricting state legislative districts in the state</p> <p>13 of Washington?</p> <p>14 A Can you clarify --</p> <p>15 Q Yeah.</p> <p>16 A -- your question?</p> <p>17 Q So you sort of told me what you know about</p> <p>18 redistricting in general, but do you have any more</p> <p>19 specific information about the process of redistricting</p> <p>20 specifically Washington's state legislative districts?</p> <p>21 A Well, I can tell you that there's some -- some</p> <p>22 requirements about what the redistricting team has to do</p> <p>23 is to make sure that, you know, the folks that live in a</p> <p>24 particular area are kind of -- you know, stay together,</p> <p>25 you know, for instance. At least that they try to do</p>	<p style="text-align: right;">Page 78</p> <p>1 that.</p> <p>2 They try to make sure if there's any physical</p> <p>3 barriers, like the Cascade mountains, you don't want to</p> <p>4 cross them because it's kind of hard to do, or things like</p> <p>5 that. And they want to -- I think they have to be --</p> <p>6 Every district has to be continuous. It can't be broken</p> <p>7 up in pieces.</p> <p>8 So those are kind of the general rules that they</p> <p>9 have out there.</p> <p>10 Q And what's informing your understanding of state</p> <p>11 legislative redistricting in Washington?</p> <p>12 A Because I think I -- I think there was a -- Somebody</p> <p>13 gave me a paper or something, if I remember right, and</p> <p>14 said, "How does it work?" And this is how it works, like</p> <p>15 a two-pager.</p> <p>16 Q And was that during the 2021 redistricting process?</p> <p>17 A Yes.</p> <p>18 Q What do you know about the Federal Voting Rights</p> <p>19 Act?</p> <p>20 A Not much.</p> <p>21 Q What little do you know?</p> <p>22 A The vote has to be fair, and fair depends on where</p> <p>23 you're sitting. So if you're in Yakima, it's going to be</p> <p>24 different than it would be in Quincy, so --</p> <p>25 Q You currently live in Legislative District 13; is</p>
<p style="text-align: right;">Page 79</p> <p>1 that correct?</p> <p>2 A I do.</p> <p>3 Q And prior to the 2021 redistricting you lived in</p> <p>4 Legislative District 13 as well; is that right?</p> <p>5 A State that again.</p> <p>6 Q And you also lived in Legislative District 13 prior</p> <p>7 to the most recent round of redistricting; correct?</p> <p>8 A Yes.</p> <p>9 Q And as we've discussed, you currently represent</p> <p>10 LD 13 in the Washington legislature; correct?</p> <p>11 A Yes.</p> <p>12 Q Do you have any objections to the configuration of</p> <p>13 LD 13 that resulted from the 2021 redistricting process?</p> <p>14 A I wouldn't call them objections, but I want Mattawa</p> <p>15 back and Schwana. They -- I live in Grant County. They</p> <p>16 live in Grant County. Our utilities are Grant County PUD.</p> <p>17 They live in -- They go to the Mattawa or the Waluke</p> <p>18 School District, which is my -- As a school board member I</p> <p>19 represent the Waluke School District. So they're a Grant</p> <p>20 County community, not a Yakima County community.</p> <p>21 And so being in the 15th, I think they're -- You</p> <p>22 know, they may not get the representation that they may</p> <p>23 receive if they were -- have representation from the 13th.</p> <p>24 Q And do you see LD 13 as representing Grant</p> <p>25 communities more so than Yakima communities?</p>	<p style="text-align: right;">Page 80</p> <p>1 A To some extent, yes.</p> <p>2 Q What part of your district would you prefer to lose</p> <p>3 to gain back Mattawa and Schwana?</p> <p>4 A Yakima -- Yakima areas.</p> <p>5 Q And why is that?</p> <p>6 A Because they're close. They're -- Because Yakima is</p> <p>7 farther way from where my district is. It's the way far</p> <p>8 south part of my district, my new district.</p> <p>9 And so there's a piece right in the middle of my</p> <p>10 district that is much closer to the center of the</p> <p>11 District 13 than some of those Yakima areas.</p> <p>12 Q Do you believe that you would be harmed if the</p> <p>13 configuration of LD 15 was to be changed right now?</p> <p>14 A Would I be harmed?</p> <p>15 Q Yes.</p> <p>16 A Yeah. Yeah, I think so.</p> <p>17 Q How so?</p> <p>18 A Well, I'm already starting to go to the new areas</p> <p>19 that I represent and speaking with those constituents and,</p> <p>20 you know, figuring out what their issues are and trying to</p> <p>21 help them.</p> <p>22 Session is coming up in January, and so there's a</p> <p>23 lot of work to be done to support all my new communities</p> <p>24 that I represent. And so all that work that I've been</p> <p>25 putting in and the rest of the legislators of the 13th</p>

20 (Pages 77 to 80)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

<p style="text-align: right;">Page 81</p> <p>1 have put in to try to support those areas, it's not going 2 to happen.</p> <p>3 And so I think my constituents that I lose and then 4 gain from Mattawa, I've lost all that homework. You know, 5 for instance, I haven't -- I spoke to some of the folks in 6 the Mattawa area to see if things are going good with 7 their new legislators and make sure that they don't get, 8 you know, lost in the shuffle with the new legislators 9 that are going to represent them. So I'm kind of looking 10 out for those guys just because I don't want them to -- 11 because of the changes I don't want them to suffer because 12 of it.</p> <p>13 And again, I think because I now represent more of 14 Yakima that the work I've been putting in to support those 15 guys, because of redistricting they may lose as well -- 16 lots of folks.</p> <p>17 Q So do you understand yourself to be involved in this 18 lawsuit as an intervenor to defend against further changes 19 to the map?</p> <p>20 A I guess I would tell you my -- I think my role as an 21 intervenor is to explain that I represent everybody, and I 22 represent anybody that -- Wherever that map is, I'm going 23 to represent them, no matter the color. If they're 24 Hispanic or not Hispanic, I'm going to represent them. I 25 just want to make sure that nobody is harmed. That's all.</p>	<p style="text-align: right;">Page 82</p> <p>1 If this intervention comes in, I just don't want 2 anybody harmed. That's my whole goal.</p> <p>3 Q And so you don't understand yourself to be suing the 4 state to seek further changes to the map; is that correct?</p> <p>5 MR. STOKESBARY: Objection, misstates the 6 testimony.</p> <p>7 Q (By Ms. Leeper) You can answer.</p> <p>8 A I -- So you guys lost me there.</p> <p>9 Q Yeah, I'll ask it again.</p> <p>10 So do you understand yourself to be suing the state 11 to seek further changes to the map?</p> <p>12 A I'm thinking about it. Good question. I'm trying 13 to figure it out.</p> <p>14 I guess I -- You know, coming into this thing I 15 didn't think that was -- I just never thought of that. So 16 I guess that's the best I can do for you.</p> <p>17 Q Yeah, I guess my question is do you see yourself or 18 understand yourself to be suing the state?</p> <p>19 A No, so -- I guess not.</p> <p>20 Q And have you -- So you see yourself as just having 21 intervened as a defendant to keep further harmful changes 22 from happening to the map; is that correct?</p> <p>23 A I think my role is to explain -- explain that as a 24 Hispanic legislator I represent whoever is in my district, 25 and I'm here as a Hispanic legislator that can support the</p>
<p style="text-align: right;">Page 83</p> <p>1 Hispanic community.</p> <p>2 And I want to make sure that whoever is going to be 3 listening to this trial knows that the folks in my 4 districts have a legislator that is going to support them. 5 I just happen to be a Hispanic legislator that doesn't 6 work those communities, no matter what those lines look 7 like.</p> <p>8 But I want to make sure that the folks in Yakima 9 area know and understand that I'm a Hispanic legislator, 10 because I think that's what they're looking for. I think 11 that the folks that sued don't think they're getting any 12 representation from Hispanic elected officials. Well, I'm 13 a Hispanic elected official that supports anybody in those 14 districts, including all the Hispanics.</p> <p>15 And so I just want to make sure that they understand 16 that I represent those folks, no matter the color. But I 17 am a Hispanic legislator that can do some good because I 18 am Hispanic, and I represent Yakima County and all the 19 folks that are in those lines. So that's what I want the 20 state to know, or whoever is going to read this or be the 21 trial judge, or whoever.</p> <p>22 Q So you're sort of here to just give voice to the 23 fact that you view that Latino representation already 24 exists?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 Q And you don't think that there needs to be any 2 changes made to the map to make that happen?</p> <p>3 A I -- I think it's up to whoever is going to draw the 4 map. I will represent anybody in my district. No matter 5 the lines, I will represent anybody in my district.</p> <p>6 And again, I will have a keen understanding of the 7 Hispanic population, wherever those lines are.</p> <p>8 Q But you personally are not really taking a position 9 on whether this map needs to change; is that right?</p> <p>10 A Yeah, I guess I don't have a position, but I will 11 represent all Hispanics that live in my district and 12 everybody else in that district.</p> <p>13 Q Do you think that you would be harmed if the 14 numbering of LD 15 was changed to LD 14?</p> <p>15 A The numbering?</p> <p>16 Q Yeah.</p> <p>17 A Like from -- You mean just change the numbers, like 18 call LD 14 the 15th?</p> <p>19 Q Yes.</p> <p>20 A It doesn't matter --</p> <p>21 Q Okay.</p> <p>22 A -- to me.</p> <p>23 Q Did you ever testify at any of the public hearings 24 held by the 2021 Washington Redistricting Commission?</p> <p>25 A Not that I recall.</p>

21 (Pages 81 to 84)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 85	Page 86
<p>1 Q Did you ever submit any written testimony to the</p> <p>2 2021 Washington Redistricting Commission?</p> <p>3 A Not that I recall. I think I listened in to one of</p> <p>4 their meetings, but I don't recall because it was a long</p> <p>5 time ago, so -- I know I listened in to one of them.</p> <p>6 Q You mentioned earlier that you spoke with</p> <p>7 Commissioner Graves, Paul Graves, during the 2021</p> <p>8 redistricting process; is that right?</p> <p>9 A Yes, it is.</p> <p>10 Q Did you ever speak with Commissioner Joe Fain?</p> <p>11 A No. I don't think so.</p> <p>12 Q Okay. How about Brady Walkinshaw?</p> <p>13 A No.</p> <p>14 Q Commissioner April Sims?</p> <p>15 A No.</p> <p>16 Q And what about the Chair of the Commission,</p> <p>17 Sarah Augustine?</p> <p>18 A No. I have spoken to her prior to her becoming</p> <p>19 Chair. I think I had met her one time, once or twice,</p> <p>20 like a year or two before.</p> <p>21 Q But you didn't speak with her during the 2021</p> <p>22 redistricting process?</p> <p>23 A No.</p> <p>24 Q How many times would you say you spoke with Paul</p> <p>25 Graves during the 2021 redistricting process?</p>	<p>1 A Two or three times.</p> <p>2 Q And when would you ballpark that those</p> <p>3 communications happened?</p> <p>4 A Prior to the preliminary map. I think I texted him</p> <p>5 or I sent him an email because one of my constituents in</p> <p>6 that -- So the 12th and the 13th obviously butt up against</p> <p>7 each other, and the line on the 12th has the new Quincy</p> <p>8 high school in the 12th. The rest of all of Quincy,</p> <p>9 except for the high school, is in the 13th.</p> <p>10 So I called Paul and said, "Paul, can you make those</p> <p>11 changes? Can you put the high school in the 13th?</p> <p>12 Because the high school is in the 12th, and I would</p> <p>13 prefer, if possible, if you can move the high school into</p> <p>14 the 13th with the rest of the town." So --</p> <p>15 And that was the first conversation I had with him.</p> <p>16 Q And was that change done in the final map?</p> <p>17 A It was. I was very happy about that one.</p> <p>18 Q And you mentioned earlier that that might have been</p> <p>19 by email or text. Did you communicate with Commissioner</p> <p>20 Graves by email and text otherwise?</p> <p>21 A I think I sent you guys that stuff, and I think -- I</p> <p>22 know -- I think he might have sent us an email that said,</p> <p>23 "I want to have a discussion with you guys." And it was</p> <p>24 Representative Dent and I because I think he was going</p> <p>25 over the preliminary maps that were going out and telling</p>
Page 87	Page 88
<p>1 us that we might get King County.</p> <p>2 So I think there was some texts or communication. I</p> <p>3 think I sent that to you, whatever I could find on my</p> <p>4 phone, and email. That I think -- I think that's what we</p> <p>5 did is just let's set up a meeting at these times.</p> <p>6 Q And that meeting happened then by phone or Zoom; is</p> <p>7 that right?</p> <p>8 A Yeah. I think it was by phone, if I remember right,</p> <p>9 but I don't recall off the top of my head.</p> <p>10 Q Okay. And so would you say that you had two or</p> <p>11 three sort of phone or Zoom calls with Commissioner Graves</p> <p>12 over the course of the process of redistricting?</p> <p>13 A Yes. We had the Quincy high school was one call,</p> <p>14 and then the call with Representative Dent was -- which</p> <p>15 was the first map that came out, the preliminary map.</p> <p>16 And then I think after the -- after the -- Right</p> <p>17 before the last maps or right after the last maps came out</p> <p>18 I think we had a discussion about what happened -- I</p> <p>19 think, so --</p> <p>20 Q Did you ever discuss with Commissioner Graves the</p> <p>21 configuration of Legislative Districts 14 or 15?</p> <p>22 A Yes. We discussed -- I discussed Mattawa and</p> <p>23 Schwana, that area, and said, "Why did we lose that?"</p> <p>24 Q And you also --</p> <p>25 A Why we could --</p>	<p>1 Q Go ahead, please.</p> <p>2 A Why we could potentially lose those areas.</p> <p>3 Q And the answer that he gave you was that you would</p> <p>4 be losing those areas because you were gaining part of</p> <p>5 King County; correct?</p> <p>6 A Yes. And losing Lincoln. So we were discussing --</p> <p>7 Because I didn't want to lose Lincoln, and I didn't want</p> <p>8 to lose Mattawa; but he -- The preliminary maps were</p> <p>9 saying District 13 would go to King County, and so it was</p> <p>10 like, "Oh, man, I don't want to lose Lincoln. I don't</p> <p>11 want to lose Mattawa and Schwana."</p> <p>12 Q And you ultimately did not have LD 13 go into King</p> <p>13 County; correct?</p> <p>14 A Correct.</p> <p>15 Q But you did lose Mattawa and Schwana?</p> <p>16 A Yes.</p> <p>17 Q And why was that?</p> <p>18 A Well, when we lost Lincoln, that's about 25,000</p> <p>19 people, so they had to give me 25,000 people --</p> <p>20 approximate numbers.</p> <p>21 So because I lost Lincoln, Lincoln was going to go</p> <p>22 to the 7th. So I lost Lincoln, which is 25 -- I think it</p> <p>23 was like 25,000 voters or so, and so they had -- The</p> <p>24 Redistricting Commission had to come up with 25,000 people</p> <p>25 to give me in the 13th. And so they said okay, you've got</p>

22 (Pages 85 to 88)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 89

1 Mattawa, Schwana, Yakima County or King County. And so
2 then they had to make a decision at their level.

3 This is my understanding of what they were doing.
4 They had to come up with 25,000 people, and where were
5 they going to -- those 25,000 people going to come from?
6 Where would they -- How were they going to get
7 redistricted into the 13th? And so they came up with what
8 they came up with. They didn't give me King County, but
9 they gave me much more of Yakima.

10 Q But you did ultimately lose Mattawa and Schwana?

11 A Yes.

12 Q Do you know how big about Mattawa and Schwana are in
13 terms of population?

14 A It's not huge. I think it's like 6,000, maybe, if
15 that. So it's not tons of people.

16 Q So you needed 25K because you lost part of Lincoln?

17 A I lost all of Lincoln.

18 Q You lost all of Lincoln?

19 A (Nodded.)

20 Q Do you know why they didn't make up 6,000 of that
21 25,000 by allowing you to keep Mattawa and Schwana?

22 A No, I don't know why they did that, other than after
23 the fact I was told they need more Hispanics in the 15th.

24 Q And who told you that?

25 A Who told me? Oh, when the lawsuit came out. When

Page 90

1 the lawsuit came out it was like, "So what exactly did
2 they do, or why did they do it?" And they kind of
3 explained it in the newspaper. They kind of explained
4 that.

5 Well, at least the newspaper said that the
6 redistricting commissioners wanted a large Hispanic
7 population, voting population in the 15th. In order to
8 get that they had to go to communities that had a large
9 Hispanic population, which was Wanapum, Schwana, Othello,
10 which is very far away from Yakima County, so --

11 Q Do the parts of Yakima County that you were given
12 have a large Latino population?

13 A I'm not quite sure, but east -- So I've got like
14 East Valley, east of Yakima, the City of Yakima, that
15 does. And I got Naches, so there's a lot of Hispanics out
16 there as well.

17 But not -- I don't think the -- But not tons because
18 that's why they took Mattawa and Schwana, because they had
19 lots of Hispanics in those cities; and I think the areas I
20 was given have less Hispanics in those areas. Because
21 they wanted the 15th -- According to the newspaper, they
22 wanted more Hispanics in the 15th.

23 Q Did Paul Graves ever talk with you about you losing
24 Mattawa and Schwana in part because of the large Latino
25 population there?

Page 91

1 A Not that I recall. It was mostly -- The discussion
2 we had was mostly about King County.

3 We didn't want King County. We didn't want to go
4 over the mountains, so -- Because it's a two-hour drive,
5 two and-a-half-hour drive from where I live, and I sit in
6 the middle of the district.

7 Q Yeah.

8 A So two hours that way, and two hours towards
9 Spokane, it's a long ways. So that would be really
10 difficult to get to meetings and things like that in those
11 areas.

12 Q And how long --

13 A Lots of miles apart.

14 Q How long of a drive about is it to the part of
15 Yakima that you got in your district?

16 A An hour and a half, which is much closer than two
17 and a half hours, so --

18 Q For sure. Okay.

19 A And again, that's just driving time if there's no
20 snow, no mountain passes, those kinds of things. So that
21 was another issue for us, how are you going to get over
22 the mountains all winter long when the pass always closes?
23 So --

24 Q Did you speak with any legislative caucus staffers
25 working on the 2021 redistricting process?

Page 92

1 A Well, there's only a couple people; right?

2 Q Yeah. I can give you some names, if that --

3 A Yeah, why don't you give me some names, just so I --

4 Q Yeah. Did you speak with Anton Grose about
5 redistricting?

6 A You know, I don't know if he was on that phone call
7 with Paul Graves, the preliminary one. He might have been
8 there, but I -- Paul was doing all the talking, so that's
9 what I recall is just Paul there.

10 I don't know if Anton was -- I don't recall him
11 being there. I don't remember if he -- I don't recall if
12 he was on the phone call or not.

13 Q Did you ever speak with Paul Campos about
14 redistricting?

15 A I don't think I know who that is, so no.

16 Q Did you at any point in the 2021 redistricting
17 process review draft maps from any of the redistricting
18 commissioners?

19 A Yes.

20 Q Which commissioners provided you with draft maps to
21 review?

22 A I don't think the commissioners gave them to me. I
23 think they came -- There was a website you could go to and
24 grab the maps.

25 Q And which maps did you view?

23 (Pages 89 to 92)

Soto Palmer, et al. v. Hobbs, et al.
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State: Objection to lines 89:10-90:22: hearsay. Rep. Ybarra is recounting what he read in the newspaper and in Plaintiffs' complaint. Again, the Yakima Herald-Tribune is not a party, and while Plaintiffs' are, they are not party-opponents. Nor do newspaper articles or Plaintiffs' complaint qualify as present sense impressions or statements of then-existing mental conditions.

Pls response: Not hearsay as opposing party statement; 803 exception as present sense impression; then-existing mental condition

State: Lines 90:23-91:6 are designated conditionally if the State's objections to the preceding lines are overruled.

Alex Ybarra

December 5, 2022

Page 93	Page 94
<p>1 A The whole state of Washington. I created my own</p> <p>2 map. I grabbed their -- They have software to manipulate</p> <p>3 the maps, and so I started --</p> <p>4 I'm a data analyst, and so I get a kick out of</p> <p>5 moving maps around and moving populations around. So I</p> <p>6 just started, you know, saying this, how I would do my own</p> <p>7 maps and how I would want things, and see if it would work</p> <p>8 for every district, if that makes sense. Yeah.</p> <p>9 Q Yeah, we're all mapping nerds here, so I do know</p> <p>10 what you're talking about.</p> <p>11 A Okay.</p> <p>12 Q How many draft maps would you say that you created?</p> <p>13 A Well, I betcha I spent 200 hours working on the</p> <p>14 maps -- 200 hours, yes.</p> <p>15 Q Did you --</p> <p>16 A Precinct by precinct, numbers by numbers. Ten</p> <p>17 people in a precinct, I'd move them over and change this</p> <p>18 to change that, so yeah.</p> <p>19 Q Did you share your draft maps with anyone?</p> <p>20 A Yes.</p> <p>21 Q Who?</p> <p>22 A Senator Warnick in the 13th and Representative Dent.</p> <p>23 I don't think I sent them to them; but we had a Zoom</p> <p>24 meeting where we looked at the maps, and I said, "This is</p> <p>25 how it works."</p>	<p>1 We had an in-person one, too. I grabbed a map that</p> <p>2 came from the redistricting website, and I said, "This is</p> <p>3 what I did. This is what I think, how it could work for</p> <p>4 us." So maybe -- You know, that's what I did, so --</p> <p>5 Q Did you ever share those maps with Commissioner</p> <p>6 Graves?</p> <p>7 A Not that I recall.</p> <p>8 Q Did you when talking with Commissioner Graves use</p> <p>9 those maps as a touch point to request how you would want</p> <p>10 your district to look?</p> <p>11 A I don't recall that at all because I think that he</p> <p>12 gave us a preliminary. When the preliminary maps came</p> <p>13 out, then that's when I jumped in and said, "Oh, my gosh,</p> <p>14 I'm going to get King County. There's no way I want</p> <p>15 King County."</p> <p>16 So I was preparing to talk to Paul Graves about how</p> <p>17 I would configure to -- configure things so I don't go to</p> <p>18 King County. So my whole goal was I don't want King</p> <p>19 County. How do I keep myself on this side of the</p> <p>20 Cascades.</p> <p>21 And so I was working with the maps, and so I could</p> <p>22 talk to Paul and say, "Paul, I've got a solution for you."</p> <p>23 Q Do you recall what software you used to make those</p> <p>24 maps?</p> <p>25 A It was off the website from the redistricting thing.</p>
Page 95	Page 96
<p>1 And I couldn't move -- I could move it by precinct, so</p> <p>2 every little map, it was all by precinct. So I could just</p> <p>3 move the precincts.</p> <p>4 And I don't know what the software was called, but I</p> <p>5 think it came from the redistricting website, so --</p> <p>6 Q And do you still have copies of those maps that you</p> <p>7 created?</p> <p>8 A I don't know because I think they saved to the</p> <p>9 website, if I'm -- This is a while back; right? So I</p> <p>10 think you could save the maps, I think on the website, but</p> <p>11 I don't think I saved them to my computer systems or</p> <p>12 anything.</p> <p>13 Q Do you recall if you had to make an account or</p> <p>14 anything like that to save the maps?</p> <p>15 A I think I might have, yeah.</p> <p>16 Q Do you recall what email you would have used to make</p> <p>17 that account?</p> <p>18 A No. I've got two. I had my personal, and I've got</p> <p>19 my Leg. So I don't recall which one it was.</p> <p>20 Q And what --</p> <p>21 A I don't recall.</p> <p>22 Q What is your personal email address? I promise I</p> <p>23 won't be signing you up for any subscriptions.</p> <p>24 A Okay. It's QuincyROO@Yahoo.com.</p> <p>25 Q Thank you.</p>	<p>1 What did Representative Dent think about the map</p> <p>2 that you created?</p> <p>3 A I think he liked them because it -- The maps I</p> <p>4 created didn't have King County in our district, so</p> <p>5 anything to stop that from happening he was liking.</p> <p>6 Q And how about Senator Warnick?</p> <p>7 A About the same.</p> <p>8 Q Did the map you created keep Mattawa and Schwana in</p> <p>9 your district?</p> <p>10 A It depended on the map.</p> <p>11 Q Did most of the maps that you created include</p> <p>12 Mattawa and Schwana?</p> <p>13 A If I recall, yes.</p> <p>14 And I also got Othello in there sometimes, and</p> <p>15 sometimes I didn't. Again, just playing with the numbers.</p> <p>16 Everything was going around. You know, if you've played</p> <p>17 with the maps, you know what I'm talking about.</p> <p>18 Q Do you recall if you ever grabbed the portion of</p> <p>19 Yakima that ultimately ended up in your map as part of</p> <p>20 that draft map?</p> <p>21 A Yes. Yes, because I had to make the numbers fit,</p> <p>22 so -- Yeah. So yeah, definitely did.</p> <p>23 I didn't go down East Valley, but I did go through</p> <p>24 the Naches area and started grabbing folks from there when</p> <p>25 I'm playing with the maps, but yeah.</p>

24 (Pages 93 to 96)

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

December 5, 2022

<p style="text-align: right;">Page 97</p> <p>1 Q Was that your preferred configuration?</p> <p>2 A Well, my preferred configuration was keeping Lincoln</p> <p>3 County and keeping what I had, but that wasn't going to</p> <p>4 work because the 7th had a really small population. The</p> <p>5 7th District, which is up north up above Spokane, needed a</p> <p>6 lot -- They needed like 20,000 people because their</p> <p>7 population hadn't grown, and everybody else's had.</p> <p>8 So where were the people going to come from? And so</p> <p>9 that -- So it kind of just -- That's kind of where the rub</p> <p>10 was across the state, at least on the Eastern Washington</p> <p>11 side.</p> <p>12 Q So you're creating maps for statewide to try to make</p> <p>13 everything add up; is that right?</p> <p>14 A Mostly Eastern Washington.</p> <p>15 Q And is it correct to say that you were paying</p> <p>16 particular attention LD 13, your district?</p> <p>17 A Yes, but mostly Eastern Washington.</p> <p>18 Q And so would you say that you paid particular</p> <p>19 attention to LD 15 or LD 14?</p> <p>20 A I paid attention to all the districts in Eastern</p> <p>21 Washington because when you're manipulating the 7th it</p> <p>22 messes up the 4th and the 3rd and the 16th and the 14th</p> <p>23 and the 15th and the 13th.</p> <p>24 So when you move one district it jumbles everything</p> <p>25 together, so a big puzzle. And so you have to be aware of</p>	<p style="text-align: right;">Page 98</p> <p>1 every single district because they all get affected no</p> <p>2 matter the change, so --</p> <p>3 Q So we've talked about the maps that you've made and</p> <p>4 that you drafted and were playing with and shared with</p> <p>5 others. Other than the maps that were publicly available</p> <p>6 on the website, did any commissioners -- or in particular</p> <p>7 I think it would have been Commissioner Graves -- ever</p> <p>8 share draft maps with you to look at?</p> <p>9 A Not that I recall. I think it might -- They might</p> <p>10 have been on a Zoom meeting or something, or -- But I</p> <p>11 don't -- I think he --</p> <p>12 I think that the Commission had published a</p> <p>13 preliminary map, I think. And I think that was the first</p> <p>14 time I think I saw the preliminary map -- I think. Again,</p> <p>15 this is a while back, so I'm trying to remember. I</p> <p>16 thought they published the preliminary map, so -- or they</p> <p>17 sent it or -- I don't know. Somehow we got it.</p> <p>18 And I think it was during the discussions the</p> <p>19 preliminary maps came out, and they were having folks come</p> <p>20 online for two or three hours. And they would ask</p> <p>21 questions about each one, and then people would talk</p> <p>22 about, you know, we need to keep Mattawa, or we need to</p> <p>23 keep Quincy; or we need to keep Spokane, or we need to</p> <p>24 keep -- and people were just coming.</p> <p>25 And I think that's when those preliminary maps came</p>
<p style="text-align: right;">Page 99</p> <p>1 out. So that's when I -- I'm pretty sure that's when I</p> <p>2 first saw them.</p> <p>3 Q Do you recall any conversations that you have not</p> <p>4 yet mentioned that you had during the 2021 legislative</p> <p>5 redistricting process related to the configuration of</p> <p>6 Legislative Districts 14 or 15?</p> <p>7 A No. I mean, just in general. I mean, you know,</p> <p>8 who's going to -- Am I going to keep Yakima County? You</p> <p>9 know, people in Yakima County, it's going to get bigger or</p> <p>10 smaller. You know, who is going to get Othello? Who is</p> <p>11 going to get --</p> <p>12 At the beginning I just never thought that Mattawa</p> <p>13 would be leaving me. I would not have it. I just</p> <p>14 assumed -- You know, I just thought I was going to -- It</p> <p>15 wasn't going to be an issue, and then all of a sudden it</p> <p>16 was, so --</p> <p>17 Q Why did you make the assumption early on that there</p> <p>18 was no question that you would be keeping Mattawa?</p> <p>19 A Because it's in Grant County. It's in Grant County.</p> <p>20 It was just -- It's like in the center of the district,</p> <p>21 and it was like -- It's only 30 miles away from where I</p> <p>22 live, and so -- and I live in, you know, the center of the</p> <p>23 district and stuff. So I just said, "Oh, yeah, I'm not</p> <p>24 going to lose that."</p> <p>25 And it has no -- There's a big barrier between</p>	<p style="text-align: right;">Page 100</p> <p>1 Mattawa and Yakima, which is one, the Columbia River. And</p> <p>2 then in order to get from Mattawa to Yakima it's an hour,</p> <p>3 hour and a half drive. So I said, "They're not going to</p> <p>4 pick up Mattawa. Nobody is going to want to go from</p> <p>5 Yakima, where they represent, all the way around just to</p> <p>6 go to Mattawa for the 5,000 there."</p> <p>7 It makes a lot more sense for Alex Ybarra and</p> <p>8 Tom Dent and Senator Warnick to go 30 miles to go to</p> <p>9 Mattawa -- much more sense, as -- right, as you're</p> <p>10 driving.</p> <p>11 Q Um-hmm.</p> <p>12 A And so there's a big barrier between Mattawa and the</p> <p>13 Yakima County areas, so --</p> <p>14 And if you're not familiar with it, there's a firing</p> <p>15 range. There's an Army firing range right there. So</p> <p>16 you've got the Columbia River, a major firing range. So</p> <p>17 nobody lives there for 30 miles, 40 miles.</p> <p>18 And again, there's no roads to go from Mattawa to</p> <p>19 Yakima from there. You have to go all the way around. So</p> <p>20 it makes no sense for -- Well, it didn't make any sense</p> <p>21 for me to think I would lose that.</p> <p>22 Q So you do view obviously, it seems, Mattawa as</p> <p>23 having sort of a community connection with your district;</p> <p>24 is that right?</p> <p>25 A Yes.</p>

25 (Pages 97 to 100)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 101	Page 102
<p>1 Q And not having a community connection with where it</p> <p>2 was added; is that also right?</p> <p>3 A Yes.</p> <p>4 Q Do you know Jim Honeyford?</p> <p>5 A Senator Honeyford, yes.</p> <p>6 Q How do you know him?</p> <p>7 A He's a senator, so we work with him.</p> <p>8 Q Have you ever discussed this lawsuit with him?</p> <p>9 A Not that I recall.</p> <p>10 Q Have you ever discussed the legislative</p> <p>11 redistricting of LD 15 with him?</p> <p>12 A Not that I recall.</p> <p>13 Q When did you learn that Senator Honeyford would be</p> <p>14 retiring?</p> <p>15 A When he announced.</p> <p>16 Q Do you know Nikki Torres?</p> <p>17 A I do.</p> <p>18 Q How do you know her?</p> <p>19 A She used to be the Hispanic Chamber president in the</p> <p>20 Tri-Cities, so she was a fairly known Hispanic person.</p> <p>21 Q And did you work with her in that capacity?</p> <p>22 A No. I just saw her at events. I met her a</p> <p>23 couple -- I met her, and we had conversations.</p> <p>24 Q Prior to her running were you aware of the partisan</p> <p>25 affiliations of Nikki Torres?</p>	<p>1 A No.</p> <p>2 Q Did you have any guesses about her partisan</p> <p>3 affiliations or assumptions?</p> <p>4 A No.</p> <p>5 Q Have you ever discussed --</p> <p>6 A I didn't.</p> <p>7 Q Oh, please go ahead.</p> <p>8 A No, I'm good. I'm fine.</p> <p>9 Q Have you ever discussed this lawsuit with Nikki</p> <p>10 Torres?</p> <p>11 A I think I might have mentioned to her that I was a</p> <p>12 part of it.</p> <p>13 Q And when do you think you mentioned that to her?</p> <p>14 A Within the last month or so.</p> <p>15 Q Is there anything that she said to you about her</p> <p>16 thoughts on the lawsuit?</p> <p>17 A No. No. We just kind of -- I said I'm just part of</p> <p>18 it because I'm an intervenor, or whatever we call those,</p> <p>19 and just said so I -- You know, "It's going to come up to</p> <p>20 trial, and things could change for you and me," something</p> <p>21 like that.</p> <p>22 Q And what did she say?</p> <p>23 A She said, "Yeah, I kind of" -- You know, "That's</p> <p>24 what people are saying," something like that.</p> <p>25 And again, it was more of the discussion was about</p>
Page 103	Page 104
<p>1 if the lawsuit goes through, and depending on how it comes</p> <p>2 out, you know, we -- our lines may change, so --</p> <p>3 Q Did she share any thoughts on how she would or</p> <p>4 wouldn't prefer the lines to change?</p> <p>5 A No.</p> <p>6 Q Did you talk about the Mattawa and Schwana issue</p> <p>7 with her?</p> <p>8 A A little bit, but --</p> <p>9 Q What did you guys talk about with that?</p> <p>10 A Well, she was running for office, so it wasn't</p> <p>11 during the discussions of the redistricting. It was when</p> <p>12 she was running for office, the lines were kind of set for</p> <p>13 the election.</p> <p>14 So I discussed with her about Mattawa. So I want</p> <p>15 her to take care of the folks I was -- my constituents in</p> <p>16 Mattawa and Schwana. So I said, "Look, it looks like if</p> <p>17 you win, you're going to be taking care of these guys.</p> <p>18 Let me tell you about what they're all about, what they</p> <p>19 need. You know, what great people they are," those kind</p> <p>20 of things.</p> <p>21 Q Other than that did you have any more discussions</p> <p>22 with Nikki Torres about the legislative redistricting of</p> <p>23 LD 15?</p> <p>24 A Not that I recall.</p> <p>25 Q When you had that conversation with her about</p>	<p>1 Mattawa and sort of its people and its needs, what did you</p> <p>2 tell her about the needs of Mattawa?</p> <p>3 A Well, there's like the two populations there. You've</p> <p>4 got the -- you know, just the towns, but you also have the</p> <p>5 Wanapum Indians that they have, you know, their culture as</p> <p>6 well and how it intertwines with Mattawa and the school</p> <p>7 districts.</p> <p>8 And so we talked about the school district. You</p> <p>9 know, some of the things that they have there, some of the</p> <p>10 issues that they have. Talked about Mattawa. Talked</p> <p>11 about Grant County PUD because it manages a lot of land</p> <p>12 and all the, you know, the fish and things like that that</p> <p>13 are -- Because they sit right on the Columbia River.</p> <p>14 And so we discussed all the issues that I knew about</p> <p>15 that she would probably need to be aware of.</p> <p>16 Q Did you ever discuss the redistricting of LDs 14 or</p> <p>17 15 with Jim Troyer?</p> <p>18 A Not that I recall.</p> <p>19 Q Did you ever speak with Jim Troyer about Jim</p> <p>20 Honeyford's retirement?</p> <p>21 A Just in general.</p> <p>22 Q What was sort of the general contours of that</p> <p>23 conversation?</p> <p>24 A Well, probably for the last 25 years people were</p> <p>25 asking Jim Honeyford when he's going to retire. So then</p>

26 (Pages 101 to 104)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 105	Page 106
<p>1 it was like is he going to retire? You know, it was</p> <p>2 always a (shrugged). You never know, so --</p> <p>3 Q Did you ever talk with Jim Troyer about who might be</p> <p>4 a good candidate to replace Senator Honeyford in LD 15?</p> <p>5 A Yes.</p> <p>6 Q How many times would you say you've talked with him</p> <p>7 about that?</p> <p>8 A Two or three times.</p> <p>9 Q And when did those two or three conversations occur?</p> <p>10 A Probably after redistricting sometime. You know,</p> <p>11 when people were starting to sign up, put their names in</p> <p>12 the hat for election. So prior to -- It was -- Well, I</p> <p>13 take that back. It was prior to when people could sign up</p> <p>14 to run for election.</p> <p>15 Q And it was for this most recent election?</p> <p>16 A Yes.</p> <p>17 Q Did you speak about any particular potential</p> <p>18 candidates?</p> <p>19 A Many of them. Many.</p> <p>20 Q Whose names do you remember?</p> <p>21 A Nikki Torres. The guy that won in the 15th, the</p> <p>22 representative. I -- I can't remember his name. The one</p> <p>23 that -- the guy that won.</p> <p>24 Let's see. Other Hispanic leaders in Yakima County,</p> <p>25 because they were -- We were trying to find some good</p>	<p>1 candidates to run in the -- in those areas. And for me I</p> <p>2 wanted more Hispanic leadership, more Hispanic</p> <p>3 representation.</p> <p>4 Q Is there --</p> <p>5 A I knew the community, the Hispanic community. So</p> <p>6 those are the people I was mentioning more than others,</p> <p>7 because I know that community, so --</p> <p>8 Q Why did you --</p> <p>9 A And I live there.</p> <p>10 Q Why did you want more Hispanic representation?</p> <p>11 A Well, I don't think it was Hispanic representation.</p> <p>12 I think it was people that I knew. And the people that I</p> <p>13 usually know and run around with -- or not run around</p> <p>14 with. But the things I get invited to, there's a lot of</p> <p>15 Hispanic leaders out there in Yakima, the Tri-Cities,</p> <p>16 Quincy, that people know little about; and so I was trying</p> <p>17 to --</p> <p>18 And it wasn't that they were Hispanic leaders. It's</p> <p>19 that they're not well known. And so I knew that they</p> <p>20 would -- They could potentially be good legislators, and</p> <p>21 they just happened to be Hispanic. And so people usually</p> <p>22 don't hear about those folks, so I was bringing those</p> <p>23 folks out to the forefront and saying, "These guys will be</p> <p>24 good." And because they --</p> <p>25 That's a lot of the meetings I go to are with</p>
Page 107	Page 108
<p>1 Hispanic organizations. I knew those people, so -- And I</p> <p>2 sort of also knew that if you're not, you know, going to</p> <p>3 the Hispanic Chamber in the Tri-Cities or Yakima, you</p> <p>4 don't know those people. And so I was just -- I just knew</p> <p>5 those people would be good to -- might be good</p> <p>6 legislators, yeah.</p> <p>7 Q Was Jim Troyer particularly interested in finding a</p> <p>8 good Hispanic candidate to run for Senate in LD 15?</p> <p>9 A I don't -- I can't read what Jim was looking for.</p> <p>10 He just asked if I knew folks. You know, because he</p> <p>11 was -- folks in Central Washington. Because he knew I</p> <p>12 was -- He knew -- Well, he didn't know, but he knew I was</p> <p>13 going to the Chamber, the Hispanic Chamber meetings and,</p> <p>14 you know, on Spanish radio and all the Spanish radios in</p> <p>15 the Tri-Cities and in Yakima, Moses Lake.</p> <p>16 So he knew I was -- You know, those are the types of</p> <p>17 people I probably would bring up to him.</p> <p>18 Q And did he tell you why he was coming to you for</p> <p>19 recommendations of good candidates?</p> <p>20 A Well, he actually didn't come to me. It was other</p> <p>21 people that came to me. Somebody got called by somebody</p> <p>22 that got called, and then they said, "Hey, I hear you</p> <p>23 might know some good folks in Central Washington." And so</p> <p>24 then it was like, "Okay. Like what are you looking for?</p> <p>25 For what position, where?"</p>	<p>1 Because I know a lot of people in Central</p> <p>2 Washington, so --</p> <p>3 Q And do you recall who told you to reach out to</p> <p>4 Jim Troyer to give him these recommendations?</p> <p>5 A No. No. I just ran into Jim one time, I think in</p> <p>6 the Legislature. You know, there's lot of legislative</p> <p>7 meetings that happen, and we got to talking about the</p> <p>8 election and things like that -- and off campus,</p> <p>9 obviously, so -- but discussing campaign things.</p> <p>10 And so it's going to be brought up and say who are</p> <p>11 the candidates that might be running, and so then names</p> <p>12 start popping up here and there, so -- And we're talking</p> <p>13 like, you know, a hundred people; right? A hundred people</p> <p>14 that their names pop up.</p> <p>15 Q Did you speak with him about whether Nikki Torres</p> <p>16 would be a good candidate in LD 15?</p> <p>17 A Yeah, I think so. I think we discussed that I did</p> <p>18 like her. I think that she would be a good leader.</p> <p>19 Q Did you have any preferences of the names that you</p> <p>20 gave him? Did you have anyone that you were rooting for</p> <p>21 in particular?</p> <p>22 A Yeah, and it wasn't Nikki.</p> <p>23 Q Who was it?</p> <p>24 A It was Mike Gonzalez.</p> <p>25 Q And why did you want Mike Gonzalez to be the person</p>

27 (Pages 105 to 108)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 109	Page 110
<p>1 who would fill that role?</p> <p>2 A Because I knew Mike. I knew Mike a lot more than I</p> <p>3 knew Nikki, and I thought he would do a great job.</p> <p>4 Q Was the individual you were talking about earlier</p> <p>5 who ended up running in LD 15 for the representative</p> <p>6 position, was that Bryan Sandlin?</p> <p>7 A It -- Yes. Yes, it's Bryan.</p> <p>8 Q And did you have an opinion as to whether</p> <p>9 Bryan Sandlin should run for the Senator post or if</p> <p>10 Nikki Torres should run for the Senator post?</p> <p>11 A No.</p> <p>12 MS. LEEPER: Okay. I think this might be</p> <p>13 another good opportunity for us to go off the record and</p> <p>14 take a bit of a break.</p> <p>15 THE WITNESS: Okay.</p> <p>16 (Break 11:52 a.m. to 12:12 p.m.)</p> <p>17 (Discussion off the record.)</p> <p>18 MS. LEEPER: All right. Let's go back on</p> <p>19 the record. Hopefully that wasn't, otherwise we're going</p> <p>20 to be giving away Fantasy Football information.</p> <p>21 Q (By Ms. Leeper) Representative Ybarra, I just have</p> <p>22 a few more questions for you today. I'm wondering if you</p> <p>23 have seen a legal claim in this case that was filed in</p> <p>24 your name in early November.</p> <p>25 A A legal claim? Yeah, I think that's what my lawyer</p>	<p>1 sent me to get on this interview -- intervention, or</p> <p>2 whatever we call this thing.</p> <p>3 Q Yeah. So I'll explain to you, obviously there's</p> <p>4 lots of legal jargon here; and so we use these words, like</p> <p>5 everyone knows what they mean.</p> <p>6 So basically a claim is something you file with the</p> <p>7 court where you make sort of an affirmative argument about</p> <p>8 something. So not just defending something, but you're</p> <p>9 actually making an affirmative argument on your own</p> <p>10 behalf.</p> <p>11 A Oh. Yes. Yes, I think so.</p> <p>12 Q Have you seen a crossclaim that was filed by your</p> <p>13 counsel in early November?</p> <p>14 A Yes. Yes.</p> <p>15 Q Okay. And what's your understanding of that</p> <p>16 crossclaim?</p> <p>17 A That the -- That the -- That the lines that were</p> <p>18 drawn were drawn for -- were not appropriate, were not --</p> <p>19 It was done because they wanted more Hispanics in the</p> <p>20 15th, and that was not proper per the laws.</p> <p>21 It should be just again, according to the</p> <p>22 redistricting laws and things like that and everything</p> <p>23 else, it should be done to where people live and the areas</p> <p>24 that they are -- Their areas are the same, but what was</p> <p>25 really -- what I think was done was more that a set of</p>
Page 111	Page 112
<p>1 redistricting commissioners really wanted a bunch of</p> <p>2 Hispanics in the 15th, like tons and tons, and they didn't</p> <p>3 get it. And because they didn't get it, you know,</p> <p>4 they're -- That's why the lawsuit was there.</p> <p>5 But I think that the point of the -- of that is that</p> <p>6 it shouldn't be done because of -- It shouldn't be done</p> <p>7 because of race. It should be done because of who the</p> <p>8 voters are and where they are. It shouldn't be done for</p> <p>9 race purposes.</p> <p>10 Q And what outcome are you hoping will come from that</p> <p>11 claim?</p> <p>12 A Well, the outcome, I just -- I think that the lines</p> <p>13 are fine. You know, now that I look at them, now that I'm</p> <p>14 in them, they look fine to me.</p> <p>15 So I don't -- I don't want the 15th to be -- Because</p> <p>16 I think that if they start -- if we -- If the lines change</p> <p>17 to put more Hispanics in, then I don't -- I think that</p> <p>18 takes away from, you know, how an election should happen.</p> <p>19 I don't want elections to be done because of all the</p> <p>20 Blacks live in one area, so you're going to, you know,</p> <p>21 draw the map around Blacks or Whites or Jews or Caucasians</p> <p>22 or women, or whatever it might be. I think it should be</p> <p>23 wherever you live, these are the lines; and whoever lives</p> <p>24 there lives there, and they shouldn't move them around.</p> <p>25 Q And so do you want to see the maps stay the way that</p>	<p>1 it is right now?</p> <p>2 A It would be fine with me, now that I know what the</p> <p>3 lines are and I've been talking to constituents. I'm okay</p> <p>4 with them.</p> <p>5 I mean, do I want Wanapum -- Do I want Wanapum back?</p> <p>6 Or not Wanapum, but do I want Mattawa back? Sure. Do I</p> <p>7 want Lincoln back? Sure. Is that going to happen?</p> <p>8 Probably not, so --</p> <p>9 Q Okay. Were you asked to conduct any searches in</p> <p>10 connection with requests for information or productions of</p> <p>11 documents related to this lawsuit?</p> <p>12 A Yes.</p> <p>13 Q How were you asked to conduct those searches?</p> <p>14 A How? I think I was emailed a request to do that.</p> <p>15 Q And so not going into sort of the communications</p> <p>16 that you had with your attorney, but specifically asking</p> <p>17 how you were asked to conduct the search. So using search</p> <p>18 terms, or --</p> <p>19 A Oh.</p> <p>20 Q -- just scrolling through your phone? Like what</p> <p>21 method were you asked to use?</p> <p>22 A Yeah, pretty much what you just mentioned is, you</p> <p>23 know, do a search for, you know, Paul Graves. Do a search</p> <p>24 for redistricting, if I see any emails. And then also on</p> <p>25 my phone, see if there's any texts to particular people</p>

28 (Pages 109 to 112)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 113	Page 114
<p>1 that might be involved in this situation, see if</p> <p>2 there's -- yeah, any texts or anything or -- anything that</p> <p>3 had to do with redistricting or people involved with</p> <p>4 redistricting, and see if there's any messages that might</p> <p>5 apply.</p> <p>6 As well as I was asked to search for my legislative</p> <p>7 emails, and so I think that happened. So that happened,</p> <p>8 both.</p> <p>9 Q Did you ever use any messaging platforms, such as</p> <p>10 like Signal or WhatsApp?</p> <p>11 A No, I don't think so. I don't know what those are.</p> <p>12 Q Did you ever message over Microsoft Teams or</p> <p>13 anything like that?</p> <p>14 A No.</p> <p>15 Q Did you conduct a search of your personal email?</p> <p>16 A Yes.</p> <p>17 Q Have you deleted any emails or electronic</p> <p>18 communications that you made or received relating to 2021</p> <p>19 redistricting?</p> <p>20 A Not that I recall.</p> <p>21 Q Have you deleted any text messages or maybe</p> <p>22 voicemails that you made or received related to 2021</p> <p>23 redistricting?</p> <p>24 A Not that I recall.</p> <p>25 Q Okay. So I'm going to turn to a few documents, and</p>	<p>1 I will just go ahead and share my screen very quickly and</p> <p>2 drop something in the chat. Give me a moment.</p> <p>3 All right. Oh, great.</p> <p>4 (Ybarra Exhibit No. 1 introduced and displayed.)</p> <p>5 Q All right. Can you see my screen?</p> <p>6 A Yes. Kind of small, but I can read it.</p> <p>7 Q Okay. Let me zoom in a little bit so it's easier</p> <p>8 for you. Have you seen this document before? And if you</p> <p>9 want I can go ahead and scroll down as you ask me to.</p> <p>10 A Yes, I think I -- Yes.</p> <p>11 Q Okay.</p> <p>12 A This is the one where we decide we want to get in as</p> <p>13 intervenor?</p> <p>14 Q No, I'll give you a second to review it so you can</p> <p>15 look at it and answer the questions.</p> <p>16 A Okay. Oh, I've got to wear glasses now, so --</p> <p>17 Yeah, I think I've seen them. They all look the</p> <p>18 same to me, so just with that said.</p> <p>19 Oh, maybe not this one, maybe. Oh, I don't -- It</p> <p>20 doesn't look familiar.</p> <p>21 Q Okay. And I'm going to go ahead and show you one</p> <p>22 more document.</p> <p>23 A Okay.</p> <p>24 Q And I'll share my screen here as well.</p> <p>25 (Ybarra Exhibit No. 2 introduced and displayed.)</p>
Page 115	Page 116
<p>1 Q And I'll zoom in and scroll down a little, slowly so</p> <p>2 you can review this as well.</p> <p>3 A So can I ask a question?</p> <p>4 Q Yeah.</p> <p>5 A So I know that there was a request from the</p> <p>6 plaintiffs, I think, and then we answered the questions.</p> <p>7 Q Um-hmm.</p> <p>8 A So I received those. If this is one of those, then</p> <p>9 I did look at those.</p> <p>10 Q Okay. And so when did you first see that document,</p> <p>11 to your recollection?</p> <p>12 A When those first questions came in and we were</p> <p>13 supposed to try to answer them, or -- In September,</p> <p>14 October, somewhere in there. I don't know. Somewhere in</p> <p>15 there.</p> <p>16 Q And how many sets of questions have you reviewed?</p> <p>17 A I'm not sure. I know there was like two sets, I</p> <p>18 think. I received like two documents that said these are</p> <p>19 the questions, and then we would review; and then we would</p> <p>20 help with the answers if need be.</p> <p>21 And then I think there was like two documents that</p> <p>22 came in, maybe three that came in that said here's one set</p> <p>23 of questions or requests for information; and then the</p> <p>24 next document would be here's another set, and then I</p> <p>25 think there was two or three.</p>	<p>1 Q And did you review all of the answers before they</p> <p>2 were sent out, to the best of your recollection?</p> <p>3 A Yes.</p> <p>4 Q Okay. Who's paying for your legal representation in</p> <p>5 this case?</p> <p>6 A Nobody.</p> <p>7 Q So you're not being charged by your attorneys; is</p> <p>8 that right?</p> <p>9 A Correct.</p> <p>10 Q Are you aware of if anyone else is paying for your</p> <p>11 attorneys?</p> <p>12 A I have no idea.</p> <p>13 Q Okay. I'm going to jump back. Earlier we were</p> <p>14 talking about some of the specific geographic areas in the</p> <p>15 Southcentral Washington region, and I was asking about the</p> <p>16 demographics in those areas. And I just wanted to ask you</p> <p>17 about a few more cities and your knowledge of the</p> <p>18 demographics there.</p> <p>19 A Okay.</p> <p>20 Q So what do you know about the demographics of</p> <p>21 Toppenish, Washington?</p> <p>22 A Oh. Lots of indigenous folks and lots of</p> <p>23 Hispanics -- lots and lots.</p> <p>24 Q And do you know anything in particular about the</p> <p>25 Latino community there?</p>

29 (Pages 113 to 116)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022


Page 117	Page 118
<p>1 A Sure. They're a lot like my community.</p> <p>2 Q And what do you mean by that?</p> <p>3 A Lots of Hispanics, lots of farmworkers -- lots and</p> <p>4 lots of farmworkers. Lots of poverty, so --</p> <p>5 Q What do you know about the demographics of Mabton,</p> <p>6 Washington?</p> <p>7 A I'm not that familiar with Mabton, but it's a lot</p> <p>8 like Toppenish, except much smaller. I'm pretty sure</p> <p>9 Mabton is just a really small, little town, but mostly</p> <p>10 Hispanics, I think.</p> <p>11 Q And what do you know about the demographics of</p> <p>12 Wapato?</p> <p>13 A A lot like Toppenish, except probably a little less</p> <p>14 poverty, but there's -- And when I say a little less</p> <p>15 poverty, it's probably instead of 90 percent poverty in</p> <p>16 Toppenish, you're 80 percent poverty in that town.</p> <p>17 Q Okay.</p> <p>18 A But similar demographics, except I think the</p> <p>19 indigenous folks -- I think there's a lot more indigenous</p> <p>20 folks in Toppenish than there are in Mabton and Wapato,</p> <p>21 but I'm not totally sure.</p> <p>22 Q Okay. I think I have maybe one more question for</p> <p>23 you, which is that if the outcome of this lawsuit would</p> <p>24 result in changes to LD 13 that would result in the</p> <p>25 reincorporation of Mattawa into LD 13, would you be harmed</p>	<p>1 by that change?</p> <p>2 A Yeah, to some extent, just because I've been working</p> <p>3 with the new folks in the new district lines, and there's</p> <p>4 a lot of work I've been putting in to, you know, try to</p> <p>5 learn how to support those folks and learn. So all that</p> <p>6 work will go by the wayside. I can share it with whoever</p> <p>7 will take over those areas, but -- You know, I've been</p> <p>8 doing a lot of work over there trying to, you know,</p> <p>9 understand what their issues are.</p> <p>10 So yeah, I'll be harmed.</p> <p>11 Q Would you view --</p> <p>12 A Not a lot, but, you know, --</p> <p>13 Q Would you view the reincorporation of Mattawa into</p> <p>14 LD 13 as a net positive or a net negative?</p> <p>15 A You know, I'd have to -- I haven't again been down</p> <p>16 there since redistricting as much as I was before, so I</p> <p>17 don't know what -- if there are additional issues that</p> <p>18 they may have down there; but I think it --</p> <p>19 I think I would do -- Because I'm closer to them and</p> <p>20 they're in my geographic area, I think it would be a</p> <p>21 positive, in my opinion, because I've been working with</p> <p>22 those folks. So I think it would be a positive.</p> <p>23 MS. LEEPER: Okay. That is all the</p> <p>24 questions that -- Actually, I'm just going to take a</p> <p>25 second. Let's take a quick five-minute -- or actually</p>
Page 119	Page 120
<p>1 like a three-minute break, and come back at 12:30 so I can</p> <p>2 review my notes; and then I think I should be letting you</p> <p>3 go, but I want to take a second.</p> <p>4 THE WITNESS: Sure.</p> <p>5 MS. LEEPER: See you in a moment.</p> <p>6 (Break 12:27 p.m. to 12:31 p.m.)</p> <p>7 (Discussion off the record.)</p> <p>8 MS. LEEPER: Okay. Let's hop back on the</p> <p>9 record.</p> <p>10 Q (By Ms. Leeper) Representative Ybarra, thank you for</p> <p>11 your time today. Just one or two more quick questions for</p> <p>12 you.</p> <p>13 During the breaks of the deposition today did you</p> <p>14 speak with anyone?</p> <p>15 A Yeah, in the breakout room.</p> <p>16 Q And when you say the breakout room -- and I'm not</p> <p>17 asking about the content of the conversation, but did you</p> <p>18 speak with your attorney during our breaks today?</p> <p>19 A Yes.</p> <p>20 Q Okay. And anyone else?</p> <p>21 A No.</p> <p>22 MS. LEEPER: Okay. That is all from me.</p> <p>23 Thank you again, Representative Ybarra, for your time</p> <p>24 today. We really appreciate it.</p> <p>25 Now the State has an opportunity if they want to ask</p>	<p>1 any questions of you, and I'll leave it to them.</p> <p>2 THE WITNESS: And before you go farther, so</p> <p>3 when you say the State, the Attorney General's Office; is</p> <p>4 that who that is?</p> <p>5 MS. LEEPER: Yes. That is Andrew Hughes.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MS. LEEPER: Yes.</p> <p>8 THE WITNESS: Okay.</p> <p>9 E X A M I N A T I O N</p> <p>10 BY MR. HUGHES:</p> <p>11 Q Good afternoon, Representative Ybarra. My name is</p> <p>12 Andrew Hughes. I'm an Assistant Attorney General in the</p> <p>13 State Attorney General's Office.</p> <p>14 How are you doing?</p> <p>15 A Good. Just saw your boss yesterday and the day</p> <p>16 before.</p> <p>17 Q Oh, yeah? How is he doing?</p> <p>18 A Good. Good. We were up at Suncadia.</p> <p>19 Q Oh, nice. Nice. He must have forgotten to invite</p> <p>20 me.</p> <p>21 MR. STOKESBARY: I think I got neglected to</p> <p>22 be invited to that as well, actually.</p> <p>23 MR. HUGHES: We're not gonna get on that</p> <p>24 list.</p> <p>25 Q (By Mr. Hughes) Representative Ybarra, before the</p>

30 (Pages 117 to 120)

Soto Palmer, et al. v. Hobbs, et al.
 LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

<p style="text-align: right;">Page 121</p> <p>1 redistricting plan became official the Legislature had to</p> <p>2 vote on it; correct?</p> <p>3 A Yes. I think to make it official.</p> <p>4 Q And you voted in favor of the plan; correct?</p> <p>5 A Yes.</p> <p>6 Q And can I assume that you stand by that vote?</p> <p>7 A Yes.</p> <p>8 Q So do you understand the map that you voted on to be</p> <p>9 an illegal racial gerrymander?</p> <p>10 A No.</p> <p>11 MR. HUGHES: Okay. That's all I have.</p> <p>12 Thank you very much.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MR. STOKESBARY: And then Andrew, if you're</p> <p>15 done -- Oh, Kate. Well, it's not my place to ask her, but</p> <p>16 if Kate doesn't have any questions from the Secretary of</p> <p>17 State's office, then I just had about two questions for</p> <p>18 Alex.</p> <p>19 Oh, she says in the chat, "None from me."</p> <p>20 EXAMINATION</p> <p>21 BY MR. STOKESBARY:</p> <p>22 Q So Alex, I just want to ask you two quick and</p> <p>23 related questions.</p> <p>24 You know, obviously we've talked about how you</p> <p>25 represent the 13th Legislative District. A number of your</p>	<p style="text-align: right;">Page 122</p> <p>1 constituents are Hispanic or Latino.</p> <p>2 Do you believe that you are responsive to the needs</p> <p>3 of your Hispanic and Latino constituents?</p> <p>4 A The answer is yes. I -- Everybody in my</p> <p>5 constituency, in my district, if they send me an email,</p> <p>6 the day they send it I send them a response. And</p> <p>7 sometimes the response is, "I'll get back to you" because</p> <p>8 I don't know the answer.</p> <p>9 But every single constituent that I have in my</p> <p>10 district always gets a response -- no matter the color, no</p> <p>11 matter the surname.</p> <p>12 Q And then you've been in the Legislature for four or</p> <p>13 five years now, so you've had a chance to work with your</p> <p>14 colleagues in the House and Senate who represent other</p> <p>15 districts in Southcentral Washington, like the 13th, 14th,</p> <p>16 15th and 8th Districts.</p> <p>17 From your experience do you think that those</p> <p>18 representatives and senators are responsive to the needs</p> <p>19 of the Hispanic and Latino constituents that they</p> <p>20 represent?</p> <p>21 MS. LEEPER: I'm just going to object that</p> <p>22 this calls for speculation.</p> <p>23 Q (By Mr. Stokesbary) Based on what you've observed,</p> <p>24 Alex, --</p> <p>25 MS. LEEPER: You can go ahead and answer.</p>
<p style="text-align: right;">Page 123</p> <p>1 Q (By Mr. Stokesbary) Alex, based on what you've</p> <p>2 observed, would you characterize your colleagues in</p> <p>3 Southcentral Washington as being responsive to the needs</p> <p>4 of Hispanics and Latinos in the areas they represent?</p> <p>5 A Yes, and they probably respond with more vigor than</p> <p>6 I do. They are usually the ones that if there's something</p> <p>7 they don't understand from a Hispanic standpoint, they</p> <p>8 sometimes ask me about certain things. And they're</p> <p>9 very --</p> <p>10 They really care about the Hispanic community, and</p> <p>11 they are very responsive, because I hear from them when</p> <p>12 they ask me questions about certain things that are</p> <p>13 happening that they may not understand because they're not</p> <p>14 Hispanic.</p> <p>15 MR. HUGHES: I didn't want to cut off the</p> <p>16 witness there, but I did want to add a foundation</p> <p>17 objection.</p> <p>18 MR. STOKESBARY: Okay.</p> <p>19 That's all I've got for you, Alex.</p> <p>20 THE WITNESS: Okay. Was I supposed to</p> <p>21 respond to Andrew? I'm not sure what --</p> <p>22 MR. STOKESBARY: No, that's -- It's okay.</p> <p>23 THE WITNESS: Okay.</p> <p>24 (Deposition concluded at 12:39 p.m.)</p> <p>25 (Signature reserved.)</p>	<p style="text-align: right;">Page 124</p> <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</p> <p>10th day of December, 2022.</p> <p><i>Jeanne M. Gersten</i></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> 

Pls. Objection
to 122:12
-123:14: calls
for specu-
lation and
lack of
foundation

31 (Pages 121 to 124)

Soto Palmer, et al. v. Hobbs, et al.
LAKESIDE REPORTING (833) 365-3376

Alex Ybarra

December 5, 2022

Page 125	
1	CHANGE/SIGNATURE SHEET
2	I, the undersigned, ALEX YBARRA, hereby certify
3	that I have read the foregoing deposition and that, to the
4	best of my knowledge, said deposition is true and
5	accurate, with the exception of the following corrections
6	listed below:
7	PAGE LINE CHANGE REASON
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	Signature Date
20	Witness: Alex Ybarra
21	Soto Palmer, et al. v. Hobbs, et al.
22	USDC Western District of Washington at Seattle
23	Cause No. 3:22-cv-05035-RSL
24	Date: December 5, 2022
25	Reported by: Jeanne M. Gersten, RDR, CCR No. 2711
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	Contact@LakesideReporting.com

Alex Ybarra

December 5, 2022

Page 126

A	110:7,9	analyses 73:23	appointment	Aseem 2:9 4:23
A-L-E-J-A-N-...	afternoon	analysis 74:17	55:7	asked 6:22
7:20	120:11	analyst 70:21	appreciate	11:23 25:24
A-R-R-B-A-N-...	ag 31:17 55:1	93:4	119:24	26:2 32:24
16:17	age 62:13,19	and-a-half-hour	approach 59:2	43:12 51:18
a.m 1:20 4:2	64:24 65:1,4,6	91:5	approached	58:19 70:13
49:23,23	ago 69:1 85:5	Andrew 2:3,20	34:10	107:10 112:9
109:16	agree 35:14,16	4:18 120:5,12	appropriate	112:13,17,21
Abbarno 15:25	agreed 35:2	121:14 123:21	110:18	113:6
16:15	Aguilar 46:6,10	Andrew.Hugh...	approximate	asking 10:10,12
ability 41:5	AHarless@Ca...	2:23	88:20	12:2 17:11
abouts 20:3	2:12	Annabelle 2:8	April 85:14	24:5 33:2,4
absolutely 6:8	ahead 7:24 9:12	4:22	124:23	48:11 104:25
access 30:10	12:21 14:24	annexed 124:6	area 8:11 16:19	112:16 116:15
64:15,17 70:11	25:20 31:6	announced	18:12,22,23	119:17
account 95:13	35:1 45:22	101:15	29:1,24 30:14	asks 34:24
95:17	88:1 102:7	answer 5:11 6:1	31:22 32:3	Assessor's 70:12
accurate 9:19	114:1,9,21	6:17,22 9:9,10	35:10 39:25	70:15,15
125:3	122:25	9:13 11:23	40:5,9,15,21	assistant 2:21
acronym 43:20	al 1:6 2:6 125:20	12:5 48:12	43:1 59:25	27:4,6 120:12
acronyms 43:20	125:20	60:21 61:3	63:15 67:16	associated 42:20
Act 22:9 78:19	Alberto 45:25	82:7 88:3	68:4,6,24 69:7	associations
action 124:12,13	Alejandro 4:4	114:15 115:13	71:15 76:23	43:11
actual 71:6	7:20,22,23	122:4,8,25	77:24 81:6	assume 6:1
Adam 42:4,6	Alex 1:14,18 3:2	answered 61:20	83:9 87:23	121:6
Adams 2:3 8:13	4:4 7:21,24	115:6	96:24 111:20	assumed 99:14
61:5,6,7,7,8	12:4 13:24	answering 7:16	118:20	assumption
add 9:10,13	14:9,14 34:25	12:7	areas 18:25	99:17
97:13 123:16	35:1 48:10	answers 8:20	19:16 21:17	assumptions
added 101:2	64:1 70:8	9:5 115:20	30:8 50:23	102:3
additional 4:20	100:7 121:18	116:1 124:16	51:5,13,25	attention 97:16
118:17	121:22 122:24	Anton 23:25	52:4 60:10	97:19,20
address 95:22	123:1,19 125:2	92:4,10	66:6 69:6 80:4	attorney 2:21
addresses 8:10	125:20	anybody 51:17	80:11,18 81:1	13:10 16:4
administer	allegations 7:11	70:24 81:22	88:2,4 90:19	17:7 112:16
124:5	allowing 89:21	82:2 83:13	90:20 91:11	119:18 120:3
Administrative	American 8:3	84:4,5	100:13 106:1	120:12,13
124:18	36:6,14 41:2	apart 91:13	110:23,24	124:12,13
aerospace 54:2	Americans	apologies 14:13	116:14,16	attorney-client
affect 51:19	36:14	apologize 14:8	118:7 123:4	48:14
affiliations	amount 10:15	appearances	argument 110:7	attorneys 2:21
101:25 102:3	22:18 23:19	58:2 59:4	110:9	4:16 6:19
affirmations	62:8 77:10	apply 113:5	Army 100:15	10:13 11:16
124:5	AMulji@Cam...	appointed 55:2	article 35:25	13:7 24:15
affirmative	2:13	55:4,20	articles 75:8	26:18 116:7,11

Auditor's 70:16	basis 7:9 48:13	111:20,21	C 2:1 124:1,1	case 4:13 7:4,12
Augustine 85:17	65:24 68:14	blame 26:10	calculation 71:9	8:10 9:25
authorized	becoming 34:19	board 7:5 9:25	73:18	16:21 25:2,16
124:4	41:19 85:18	56:6,6,25 76:1	calendar 27:13	26:5,23 27:5
available 49:9	beginning 26:6	79:18	27:14 49:8	28:20 32:23
66:10 98:5	49:12 55:15	Bob 73:12	call 7:24 22:13	34:4,19 41:14
Avenue 2:17,22	99:12	Boettcher 2:10	22:13,14 36:7	41:16,19 42:11
avoid 5:9 13:11	behalf 2:6,15	4:23	43:1 44:21	42:20 47:9,12
aware 49:11	110:10	Bombers 54:4	79:14 84:18	47:13,18 48:7
63:16 65:20	believe 50:15	born 52:22	87:13,14 92:6	48:9,17,19
68:8 97:25	80:12 122:2	boss 120:15	92:12 102:18	52:15 109:23
101:24 104:15	Ben 2:9 4:22	BPhillips@Ca...	110:2	116:5
116:10	Benancio 46:17	2:13	called 24:23,25	cases 72:12
<hr/>	Bend 20:18	Brady 85:12	43:19 44:24	categories 26:22
B	Benji 46:6,10	break 6:7,8,9,13	47:16 54:17	Caty 46:4
B 3:9	Benton 8:13	49:15,23 60:2	86:10 95:4	Caucasian 60:1
B-1 54:4	59:19 60:11,12	73:21 109:14	107:21,22	61:10,17
back 9:9 24:12	60:12,19	109:16 119:1,6	calls 87:11	Caucasians
41:12 49:24	best 13:1 45:6	breakout 119:15	122:22	37:12 72:16
53:10 54:9	58:20 61:8	119:16	camera 4:24	111:21
79:15 80:3	62:6 76:19	breaks 119:13	campaign 2:6,10	caucus 16:24
95:9 98:15	82:16 116:2	119:18	56:1 58:2,3	42:15 72:2
105:13 109:18	125:3	bring 41:8	59:5 108:9	91:24
112:5,6,7	betcha 93:13	107:17	Campos 1:13	Cause 125:21
116:13 119:1,8	better 18:1	bringing 106:22	45:2 92:13	CCR 1:22
122:7	38:23 61:3	broadly 75:16	campus 108:8	124:22,23
background	big 13:3 20:19	broke 70:20,22	candidacy 47:2	125:23
52:18	29:2 49:11	71:2	candidate 76:19	center 2:6,10
backlash 72:15	62:4 71:15,17	broken 70:19	105:4 107:8	54:17,17 80:10
ballot 64:2	89:12 97:25	73:18 74:9,23	108:16	99:20,22
72:19	99:25 100:12	75:21 78:6	candidates	Center.org 2:12
ballpark 11:9	bigger 20:16	brother 15:6	63:18,19 67:10	2:13
86:2	73:11,16 99:9	brothers 71:21	76:8,9 105:18	Central 31:3
barrier 99:25	bilingual 38:4	brought 34:18	106:1 107:19	44:2,3 51:11
100:12	bill 44:1	63:3,14 108:10	108:11	53:18 65:13
barriers 78:3	bit 5:4,7,25 12:9	Brown 66:1	capacity 1:9	71:18 76:5
based 122:23	24:11 32:22	Bruce 76:14,15	9:22 10:2	107:11,23
123:1	33:3 37:6	76:17	101:21	108:1
basically 21:13	39:14 40:8	Bryan 109:6,7,9	Capitol 16:25	certain 43:12
32:8 35:15	49:16 52:17	Bucs 13:2	care 41:1 63:8	72:5 74:14
40:10 43:20	58:14 64:17	bunch 111:1	63:10,10	123:8,12
54:25 72:2	68:2 103:8	busing 30:11	103:15,17	Certified 124:4
110:6	109:14 114:7	butt 86:6	123:10	certify 124:5,7,9
basing 67:11	Black 63:1	<hr/>	Cascade 78:3	124:11,14,15
76:20	Blacks 59:14	C	Cascades 94:20	125:2

Alex Ybarra

December 5, 2022

Page 128

chair 56:19 85:16,19	citizen 65:1,3,6 65:6	107:20 111:10 119:1	73:2 79:25,25 80:23 83:6 90:8	99:5
chairman 77:5	city 32:19,19	comes 9:11	community 44:6	configure 94:17 94:17
chairwoman 77:6	61:23 63:9 67:16,18 68:1	26:24 82:1 103:1	44:7 51:5,13 51:19 57:20,23 59:7 62:20 69:10,22 73:6 73:8 79:20,20 83:1 100:23 101:1 106:5,5 106:7 116:25 117:1 123:10	confused 12:9 Congressman 46:20
challenging 47:13	68:6,11 69:7 90:14	coming 20:6 37:5 80:22 82:14 98:24 107:18	company 53:25 53:25 54:1,17	connected 6:11 58:3
CHALMERS 2:3	claim 71:16 109:23,25 110:6 111:11	comment 7:8	complaint 7:9 26:4	connection 37:16 58:2 100:23 101:1 112:10
Chamber 101:19 107:3 107:13,13	clarification 9:11	Commission 15:9,13 68:9 84:24 85:2,16 88:24 98:12	complete 5:10 5:11 9:4,9,19	consciously 14:12
chance 6:18 30:20 122:13	clarify 5:24 9:14 11:25 77:14	Commissioner 21:2 23:14 24:2 85:7,10 85:14 86:19 87:11,20 94:5 94:8 98:7	complex 2:22	conservative 67:8,9,10 76:4 76:23,24
Chandler 76:15	clean 5:12	commissioners 15:8 19:18 20:11 90:6 92:18,20,22 98:6 111:1	composition 21:23	conservatively 67:7
change 21:12,15 57:10 59:1,5 84:9,17 86:16 93:17,18 98:2 102:20 103:2,4 111:16 118:1 125:5	cleaner 5:16 clear 5:19 clearly 21:11 35:7	common 69:14 69:20	computer 12:15 12:16 95:11	consider 20:20
CHANGE/SL... 125:1	client 13:22 35:5 35:9	commonalities 69:21	concern 20:16 20:25	constituency 122:5
changed 52:10 52:14 68:3,12 68:22 80:13 84:14	close 10:21 12:21 13:25 18:25 80:6	committee 37:19	concerned 20:18 29:2	constituents 19:4 21:8 29:23 36:20 80:19 81:3 86:5 103:15 112:3 122:1,3 122:19
changes 23:19 23:21,22 68:6 81:11,18 82:4 82:11,21 84:2 86:11 117:24	closer 61:11 80:10 91:16 118:19	common 69:14 69:20	Concerning 51:6	contact 46:11
changing 67:21	Code 124:18	communicate 86:19	concerns 20:14 41:8	Contact@Lak... 1:24 125:25
characterize 123:2	colleagues 122:14 123:2	communicated 12:4	concluded 123:24	content 10:12 17:8 119:17
charged 116:7	college 53:7,17 53:24	communication 28:1 87:2	conditions 8:25	continue 39:2
chat 114:2 121:19	color 36:9,18 38:4,10 81:23 83:16 122:10	communicatio... 24:14 25:7,9 34:24 48:12 86:3 112:15 113:18	conduct 112:9 112:13,17 113:15 124:10	continuous 78:6
Chehalis 16:19	Columbia 100:1 100:16 104:13	communities 40:4 42:25 43:13 66:9 72:23,25 73:1	configuration 79:12 80:13 87:21 97:1,2	contours 104:22
Chris 30:15	come 22:3,9 30:21 32:23 34:7 36:19 38:2 44:8 74:22 88:24 89:4,5 97:8 98:19 102:19			contribute 63:17
cities 60:16 61:19,21 62:9 73:7,11,16 90:19 116:17				conversation 16:3,6 19:13 20:3,7,10 21:1 22:3,23 28:22 30:21 34:21

35:11 86:15 103:25 104:23 119:17 conversations 10:12 14:19 16:10 17:6 19:8 21:24 22:8 23:4 26:20 27:18 28:9,11 35:2,4 41:12,18,21 42:3 45:11 46:22 51:4,14 99:3 101:23 105:9 cool 54:7,8 copies 25:10 95:6 copy 13:10 corn 31:24 correct 24:9,10 28:23 65:8 79:1,7,10 82:4 82:22 88:5,13 88:14 97:15 116:9 121:2,4 124:16 corrections 125:3 correctly 17:18 35:24 75:9 Corry 30:15 52:4 cost 59:5 council 63:9 counsel 4:12,21 14:20 110:13 124:12,13,17 count 65:10 counties 8:14 55:12 74:18 country 51:2 61:9 69:19 county 18:24 20:17,21 21:5	21:7,9,13,15 21:19,22 22:5 22:7,14 23:11 24:6,7,9 28:18 28:21,25,25 29:3 30:24 31:4,17 32:1,3 32:7,8,9,21,21 33:12,13 36:2 36:3,8,9,12 39:20 50:5,9 54:10 56:19 59:17,18,18,21 59:21 60:5,11 60:12,19,23 61:5,6,14,15 66:7,7 67:18 68:9,11 69:7 69:13 70:12,17 74:16 79:15,16 79:16,20,20 83:18 87:1 88:5,9,13 89:1 89:1,8 90:10 90:11 91:2,3 94:14,15,18,19 96:4 97:3 99:8 99:9,19,19 100:13 104:11 105:24 124:3 couple 30:23 34:17 42:19 44:12,13 58:9 92:1 101:23 course 13:4 87:12 court 1:4 5:8 110:7 124:4 courthouse 70:12,17 covered 5:7 created 93:1,12 95:7 96:2,4,8 96:11 creating 97:12	creeped 66:6 crops 66:2,4,4 66:22 cross 78:4 crossclaim 110:12,16 culture 36:24 69:17 104:5 current 54:14 54:15 currently 39:2 78:25 79:9 cut 123:15 <hr/> D dad 64:7 71:21 Dam 18:25 19:1 22:6 data 70:21 76:21 93:4 databases 74:15 Date 125:18,22 dates 10:21,22 Davenport 39:20 day 120:15 122:6 124:20 days 66:3 DC 2:11 deal 29:2 31:14 31:17 60:24 debate 46:21 47:1 decade 65:21 December 1:20 4:1 124:20 125:22 decide 35:18 114:12 decision 89:2 decreasing 66:16 defend 81:18 defendant 2:19 45:20 82:21	Defendants 1:11 defending 110:8 defined 65:13 69:23 definitely 96:22 definition 59:17 degree 53:19 degrees 53:21 deleted 113:17 113:21 Democrat 75:23 Democratic 56:18 76:2 Democrats 61:13 76:1 77:4 demographics 59:12,23 61:13 65:20 116:16 116:18,20 117:5,11,18 Dent 23:7 24:8 27:21 28:8,17 29:10 86:24 87:14 93:22 96:1 100:8 depended 96:10 depending 103:1 depends 39:5,18 39:24 72:3 73:6 78:22 deposed 5:2 7:1 7:2 deposition 1:17 5:1 8:4 9:23 10:5 11:2,9 12:8 13:4,6,9 13:12,20 14:20 24:13,15,18 25:5,14,15 26:12,15 27:10 27:16 119:13 123:24 124:6,8 124:10,11,15	125:2,3 depth 74:3 Deschutes 2:17 describing 12:1 DESCRIPTI... 3:10 details 15:3 74:11 difference 37:2 37:3,17 49:2,4 76:12 differences 76:3 different 20:20 31:4 37:6 39:16 54:6 55:12 56:8 66:6 68:2 73:1 73:15 74:15 76:9 78:24 difficult 91:10 Diplomate 1:23 124:22 direction 124:7 directly 44:11 director 56:7 discrimination 7:12 discuss 14:20 19:22 21:23 27:5 28:13,25 29:8 44:14 47:7 48:16 87:20 104:16 discussed 22:11 26:11,23,25 27:21 28:24 47:4 48:8,19 52:6 71:23 72:1 79:9 87:22,22 101:8 101:10 102:5,9 103:14 104:14 108:17 discussing 16:24 16:25 27:8,12
---	--	--	--	---

88:6 108:9 discussion 4:3 29:7,19 49:22 64:24 86:23 87:18 91:1 102:25 109:17 119:7 discussions 17:8 23:25 35:9 43:3 44:11,17 51:9,24 71:23 98:18 103:11 103:21 dismissed 50:10 displayed 114:4 114:25 district 1:4,4 7:6 7:7 16:18 17:19 18:13,17 18:18 19:25 20:17,23 21:6 21:9,19,20 23:20,21 29:8 30:7,24 31:2 31:15 33:8,9 35:22 36:20 37:20,22,23 39:2,5,6,18,24 48:6 50:16 54:12 67:24,25 68:23 74:18 77:10 78:6,25 79:4,6,18,19 80:2,7,8,8,10 80:11 82:24 84:4,5,11,12 88:9 91:6,15 93:8 94:10 96:4,9 97:5,16 97:24 98:1 99:20,23 100:23 104:8 118:3 121:25 122:5,10 125:21	districting 67:18 districts 19:15 29:21 30:12 39:17 40:1 51:2 68:2 74:10,13 77:12 77:20 83:4,14 87:21 97:20 99:6 104:7 122:15,16 Division 2:22 document 13:12 24:22 25:1 26:6 114:8,22 115:10,24 documents 11:15 12:11 24:17 25:16,21 25:23,25 112:11 113:25 115:18,21 doing 12:14 16:23 17:2 71:9 89:3 92:8 118:8 120:14 120:17 draft 20:11 25:4 92:17,20 93:12 93:19 96:20 98:8 drafted 98:4 draw 77:8 84:3 111:21 drawer 14:3 drawing 50:16 77:9 drawn 110:18 110:18 Drew 4:17 13:18 15:18 drive 13:6 91:4 91:5,14 100:3 driving 91:19 100:10 drop 114:2	DStokesbary... 2:5 dual 38:4 due 66:2,2 duly 124:14 duration 13:12 Duvall 53:8 <hr/> E E 2:1,1 3:9 4:8 120:9 121:20 124:1,1 earlier 6:16,25 11:20 16:13 22:1 26:20 40:17 42:10 52:3 57:25 66:11 85:6 86:18 109:4 116:13 early 38:23 99:17 109:24 110:13 easier 5:8 114:7 east 90:13,14,14 96:23 Eastern 31:10 54:22 97:10,14 97:17,20 easy 72:23 eat 37:9 ecological 75:10 75:12 Eddie@Morfi... 2:18 education 37:19 41:1 43:21,21 educational 52:18 educators 40:18 EDUARDO 2:16 effect 35:25 effective 124:23 elected 50:8,11	56:3 68:17 69:12 76:22 83:12,13 election 67:19 67:20 70:3,7 70:18 74:9,23 75:21 103:13 105:12,14,15 108:8 111:18 elections 63:13 68:9 70:17 73:15,19,24 111:19 electronic 113:17 Ellen 2:10 4:23 Ellensburg 53:7 else's 97:7 email 12:22 44:18 86:5,19 86:20,22 87:4 95:16,22 113:15 122:5 emailed 112:14 emails 25:10 28:6 112:24 113:7,17 employee 124:12,12 encompass 8:12 encourage 41:15 ended 24:3 96:19 109:5 endorse 58:18 endorsement 58:15 endorsements 57:1,8,12,19 57:22 58:12,19 58:25 energy 31:17 engagement 35:3 engines 54:3,5 English 38:15	38:16 39:15 40:5,11 64:19 64:21 entailed 17:24 entire 68:11 especially 37:20 et 1:6 2:6 125:20 125:20 Evangelina 46:6 events 44:9,12 101:22 everybody 36:20 59:25 62:15 68:1 69:5 70:21 71:20 76:15 81:21 84:12 97:7 122:4 Everybody's 69:5 exact 7:8 10:15 22:18 exactly 24:23 29:17 45:4 66:19 90:1 examination 1:17 3:1 124:10,14,17 examined 124:7 example 33:19 37:14,18 38:12 63:24 76:14 examples 37:15 excel 38:20 40:15 70:21,24 71:9 excelled 38:19 exception 125:3 exceptions 124:17 exchange 21:10 Excuse 57:3 Exhibit 114:4,25 exist 69:22 exists 83:24
---	---	--	---	---

experience 122:17 explain 18:2 52:2 64:10,13 81:21 82:23,23 110:3 explained 33:1 90:3,3 explaining 23:23 33:15,16 35:12 50:2 exposing 60:13 express 18:5,7 21:18 expressed 21:21 extent 12:2 34:23 48:10 80:1 118:2 <hr/> F <hr/> F 124:1 F-16s 54:5 Fabiola 46:2 face 40:5 fact 22:4,4 60:13 83:23 89:23 factor 50:16 facts 76:21 Fain 85:10 fair 78:22,22 fairly 101:20 familiar 42:10 42:17 45:1,7 46:7,16,17 47:9,13 68:12 100:14 114:20 117:7 family 15:6 fan 13:2 fantasy 12:23,24 13:4 109:20 far 80:7 90:10 farm 40:20 51:2 farmer/orchard 31:13	farmers 31:8,8 farms 31:16,24 66:23 farmworkers 31:9 38:13 40:17,21 41:3 66:4,16 117:3 117:4 farther 80:7 120:2 favor 18:16,19 121:4 Federal 78:18 feeding 63:11 feel 22:2 32:10 32:15 36:17 feelings 21:21 Fellow 2:9 fields 31:24 Fifteen 53:13 fifth 2:22 38:21 Fifty 60:6 figure 30:2 33:13 82:13 figured 17:24 figuring 80:20 file 25:23 110:6 filed 17:11 25:16 48:4,4 109:23 110:12 filing 44:10,15 filings 25:2 fill 58:16 64:2 109:1 filled 55:9 final 20:1,6 22:17,22 24:3 86:16 financially 124:13 find 6:6,8 32:2 54:23 87:3 105:25 finding 107:7 fine 8:1 46:25	50:14 102:8 111:13,14 112:2 finish 5:10 6:12 firing 100:14,15 100:16 FIRM 2:15,16 first 3:11 10:23 25:22 26:6 34:18 35:16 41:13 52:10,14 53:25,25 55:4 55:5 57:14 58:22 86:15 87:15 98:13 99:2 115:10,12 fish 104:12 fit 96:21 five 28:12 68:20 122:13 five-minute 118:25 flexible 14:17 flour 37:5,11 focused 75:14 folks 19:2 20:20 29:25 30:1,3,6 30:20 31:4,7 31:11 33:14,25 34:1 35:13,14 35:22,23 36:8 48:3 54:24 55:9,11 62:17 62:18 64:13 74:16,19 76:5 76:13 77:7,23 81:5,16 83:3,8 83:11,16,19 96:24 98:19 103:15 106:22 106:23 107:10 107:11,23 116:22 117:19 117:20 118:3,5 118:22	following 125:3 follows 4:7 Foltz 42:6 food 69:17 football 12:23 12:24 13:2 109:20 forefront 32:11 32:16 106:23 foregoing 124:6 124:17 125:2 forgot 14:12 46:9 forgotten 120:19 form 124:7 formality 14:16 format 124:18 found 33:3 foundation 123:16 four 10:15 11:12 34:3 56:11 66:5 68:20 77:7 122:12 fourth 38:17,20 Franklin 60:23 60:24,25,25 friends 71:22 73:13,14 front 11:21,22 12:6,11,15 13:5,9,20 14:13 25:22 full 7:18 9:4,8 9:18 124:16 fully 6:18 funding 44:2 further 81:18 82:4,11,21 124:7,9,11,14 124:15 future 30:3 52:8 <hr/> G <hr/> G 1:13	Gaber 2:8 4:22 gain 29:20 80:3 81:4 gained 19:15 32:9,15 gaining 28:24 88:4 gang-related 43:25 gangs 44:2,3 Garcia 46:18 47:5,9,11 48:9 48:16 gears 32:22 general 2:21,21 10:11 12:2,7 19:14 25:15 29:19 30:9 40:9 41:24 51:7 58:11 62:12,16,17 64:22 67:2 71:14,20,23 72:20,24 75:5 75:5,25 77:2,3 77:18 78:8 99:7 104:21,22 120:12 General's 120:3 120:13 generalities 5:6 generally 51:23 60:9 72:1 75:23 geographic 8:11 116:14 118:20 gerrymander 47:14 121:9 Gersten 1:22 124:22 125:23 getting 41:11 68:17 71:17 83:11 give 5:11,11,17 5:25 6:18 8:19
---	--	--	---	---

9:18 15:3 16:17 21:4 63:24 72:5 76:14 83:22 88:19,25 89:8 92:2,3 108:4 114:2,14 given 90:11,20 124:8 giving 109:20 glass 6:7 glasses 114:16 go 4:25 6:5,12 7:7,8,10,17,21 7:23 9:9,12 12:21 14:24 17:3 20:17 21:5,12,21 23:11 24:11 25:20 28:18 31:6 34:21 35:1,11 43:14 45:16,17,22 52:19 53:17 63:7 65:25 79:17 80:18 88:1,9,12,21 90:8 91:3 92:23 94:17 96:23,23 100:4 100:6,8,8,18 100:19 102:7 106:25 109:13 109:18 114:1,9 114:21 118:6 119:3 120:2 122:25 goal 82:2 94:18 goes 46:6 64:4,5 65:12 103:1 going 4:14 5:4,5 5:9,10 6:1,5 7:17 8:4,6,11 11:24 12:21 13:1,8,19 17:3	20:16 24:12 25:23 27:11 29:3 30:19,22 34:7,22 35:3 37:8,9 48:12 48:25 49:16 53:6 60:2 61:12,18,20 65:14 71:24 72:4,11 73:9 73:13 77:5 78:23 81:1,6,9 81:22,24 83:2 83:4,20 84:3 86:24,25 88:21 89:5,5,6 91:21 94:14 96:16 97:3,8 99:8,8,9 99:10,11,14,15 99:24 100:3,4 102:19 103:17 104:25 105:1 107:2,13 108:10 109:19 111:20 112:7 112:15 113:25 114:21 116:13 118:24 122:21 gonna 120:23 Gonzalez 108:24 108:25 good 4:10 49:15 56:18 63:11 65:13 70:23 71:10 81:6 82:12 83:17 102:8 105:4,25 106:20,24 107:5,5,8,19 107:23 108:16 108:18 109:13 120:11,15,18 120:18 gosh 54:17 56:10,18 94:13	grab 92:24 grabbed 50:20 93:2 94:1 96:18 grabbing 96:24 grade 38:17,21 graduated 53:7 53:18,24 Granger 42:21 42:23,24 43:2 Grant 8:13 18:24 22:7 33:12 54:10 59:17,21 61:7 61:14,15 66:6 67:6,7 69:13 79:15,16,16,19 79:24 99:19,19 104:11 granted 14:9 grapes 32:1 66:7 66:22 Graves 19:21,22 19:23 20:14 21:2,24 22:8 22:12 23:3,14 24:2 85:7,7,25 86:20 87:11,20 90:23 92:7 94:6,8,16 98:7 112:23 great 5:23 8:2 49:19 76:16 103:19 109:3 114:3 grew 38:2 Grose 23:25 92:4 ground 4:25 group 20:20 43:21 77:6 groups 50:25 57:20,23 58:12 59:7 growing 38:25	grown 97:7 guess 12:9 17:22 25:21,21 33:24 58:13,14,14 81:20 82:14,16 82:17,19 84:10 guesses 102:2 guessing 60:6 61:25 guideline 124:18 guy 46:19 64:5,9 72:18 76:16 105:21,23 guys 17:20 33:14 64:4 65:10 81:10,15 82:8 86:21,23 103:9,17 106:23 <hr/> H H 3:9 half 11:7 91:16 91:17 100:3 hand 124:19 Hang 39:7,8 happen 9:8 66:20 73:16 81:2 83:5 84:2 108:7 111:18 112:7 happened 19:14 44:17 67:23 86:3 87:6,18 106:21 113:7,7 happening 29:18 48:22 73:24 82:22 96:5 123:13 happens 9:12 happy 45:15 86:17 hard 78:4 Harless 2:8 4:22 harmed 80:12	80:14 81:25 82:2 84:13 117:25 118:10 harmful 82:21 hat 55:10 105:12 head 56:11,20 60:6 87:9 heads 5:18 health 41:1 hear 106:22 107:22 123:11 heard 45:7 hearings 84:23 heck 37:9 held 11:4 84:24 Heliodora 46:15 hello 47:6,8 help 38:8,9 52:7 54:23,24 77:7 80:21 115:20 helped 55:25 helpful 41:2,6,7 55:20 helps 36:22 43:21,22 56:2 hereunto 124:19 Hey 11:24 107:22 high 7:17 38:1 43:22 50:21 52:19,20 86:8 86:9,11,12,13 87:13 highways 30:10 hire 77:5 Hispanic 8:5,7 36:2,6,7,10,12 36:21,25 37:24 38:1,14 39:19 39:23 40:19 42:25 44:4,4,6 44:7 50:5,7,8 50:10,21,23 51:19 59:24 61:16 65:17
--	--	--	---	--

76:22,25 81:24 81:24 82:24,25 83:1,5,9,12,13 83:17,18 84:7 90:6,9 101:19 101:20 105:24 106:2,2,5,10 106:11,15,18 106:21 107:1,3 107:8,13 122:1 122:3,19 123:7 123:10,14 Hispanics 33:17 36:1 37:21,24 48:4,5 51:2 59:14 60:17 61:9,12 62:2,5 62:8,22 63:2 64:20 65:12,18 65:23 66:8 67:2,7,9 72:7 72:15 83:14 84:11 89:23 90:15,19,20,22 110:19 111:2 111:17 116:23 117:3,10 123:4 history 66:11 Hobbs 1:9 4:13 45:18,19 47:9 47:11,12 48:9 48:17 125:20 home 11:5 37:13 53:10 54:9 63:10 homework 81:4 Honeyford 101:4,5,13 104:25 105:4 Honeyford's 104:20 hop 49:19 119:8 hope 76:18 hopefully 6:5 13:3 109:19	hoping 11:25 111:10 hour 11:7,11 26:16 49:16 91:16 100:2,3 hours 91:8,8,17 93:13,14 98:20 house 64:1 122:14 Housing 41:1 huge 39:22 89:14 Hughes 2:20 3:3 4:18 120:5,10 120:12,23,25 121:11 123:15 hundred 108:13 108:13 hydrogen 16:24 I Idaho 63:6 idea 34:18 116:12 identify 4:14 8:7 44:5 illegal 121:9 impact 29:8 impacted 51:13 impacting 44:6 impair 8:22,25 impolite 53:14 importance 40:18 in-person 94:1 include 69:25 96:11 includes 14:23 including 12:22 26:17 83:14 124:16 incumbents 56:2 INDEX 3:1 Indians 18:22 104:5	indicated 124:8 indigenous 116:22 117:19 117:19 individual 42:17 45:1 46:17 109:4 individuals 4:14 industrial 55:1 industries 53:23 inference 75:12 information 33:7 65:24 70:11 77:19 109:20 112:10 115:23 informing 78:10 Infrastructure 54:18 Injunction 26:8 instance 21:7 29:24 37:5,23 72:13 76:14 77:25 81:5 instruct 13:22 35:4 48:12 instructing 12:4 instructions 12:7 13:7 interchangeably 8:5 interested 107:7 124:13 interesting 41:12 interests 69:14 interject 11:25 34:23 interrelated 23:23 Interrogatories 3:12,14 intertwines 104:6 intervene 35:18	41:15 intervened 82:21 intervenor 35:2 52:11,15 81:18 81:21 102:18 114:13 Intervenor-De... 1:15 2:2 Intervenor-De... 3:11,13 intervention 82:1 110:1 interview 110:1 interviewed 58:9 introduced 3:10 29:23 114:4,25 invite 120:19 invited 106:14 120:22 involve 12:3 involved 10:1 32:23 41:13,19 43:23 52:11,14 81:17 113:1,3 Isaac 45:25 Ismael 1:13 45:1 issue 6:20 22:12 22:13,14 29:18 37:25 40:2 44:5,7 71:15 71:17 72:21 91:21 99:15 103:6 issues 30:11 31:18,19,20,21 32:2,11,16,20 36:22,25 37:14 37:20,20,25 38:1,3,24 40:5 41:3 43:1,9 51:3 52:6 80:20 104:10 104:14 118:9	118:17 J Jackrabbits 52:21 James 41:18 January 80:22 jargon 110:4 Jeanne 1:22 5:7 6:16 124:22 125:23 Jeanne@Lake... 1:24 125:24 Jews 111:21 Jim 41:18,21,25 48:19 73:12 101:4 104:17 104:19,19,25 105:3 107:7,9 108:4,5 job 40:13 54:14 54:15,16 63:11 109:3 jobs 66:10 69:17 Joe 85:10 joining 4:20,23 JOSE 1:13 José 42:17,19 43:3 jot 6:18 judge 83:21 jumbles 97:24 jump 20:19 24:12 116:13 jumped 94:13 K Kate 2:20 4:17 121:15,16 Kate.Worthin... 2:24 KDNA 43:5 58:1,2 keen 84:6 keep 13:7 41:11
---	---	--	--	---

41:11 82:21 89:21 94:19 96:8 98:22,23 98:23,24 99:8 keeping 21:19 97:2,3 99:18 Kennewick 2:17 58:6 60:18 62:1,2,4,4,6 kick 93:4 kicked 34:9 kids 38:5,12 40:11,14,15,19 63:11,11 Kincaid 42:4 kind 14:10 29:6 33:15 36:5 48:22 58:13 60:20 68:3 73:2 74:16,18 75:4 77:24 78:4,8 81:9 90:2,3 97:9,9 102:17,23 103:12,19 114:6 kinds 91:20 King 20:17,20 21:4,7,12,15 21:19,22 22:14 23:11 24:6,7,8 28:18,24 29:3 29:3 30:24 31:3,17 32:1,3 32:7 33:13 74:16 87:1 88:5,9,12 89:1 89:8 91:2,3 94:14,15,18,18 96:4 124:3 Kirkland 53:8 Kittitas 56:19 59:18,19 knew 19:2 32:1 38:18,21 48:23	55:24 104:14 106:5,12,19 107:1,2,4,10 107:11,12,12 107:16 109:2,2 109:3 know 4:16 9:12 10:15,22 14:3 16:16,18 17:2 17:14,17 18:1 18:15 19:12 20:5,5,23 21:11,12,14 22:18,21 23:21 24:21,23,25 26:9,9 27:8,10 29:20,25 30:2 30:9,12 31:9 31:10,10,15,19 31:21 33:4,9 33:11 34:6,6,7 34:8,16 35:13 35:15 36:24 37:5,18 38:8 40:11,13 42:5 42:7,9,14,19 42:22 43:11,11 43:19 44:1 45:3,9,14,17 45:18,18,22 46:10,13 47:12 47:15,16,16,18 47:19,24,24 49:8 50:8,22 50:25 53:14 54:5 55:11 58:23,23 59:6 59:12,16,24 60:4,8,15,16 60:19,25 61:1 61:4,19,22 62:12 63:22 64:2,4,5,6,7,21 65:3,14 66:13 68:5,10,14,21	69:1,8,8,9 70:8 70:9,10 71:14 71:15,16,22,22 71:23,24 72:11 72:23 73:8,8 73:12,12,25 74:14,22 75:10 75:18 76:3,17 77:1,11,17,23 77:24,25 78:18 78:21 79:22 80:20 81:4,8 82:14 83:9,20 85:5 86:22 89:12,20,22 92:6,6,10,15 93:6,9 94:4 95:4,8 96:16 96:17 98:17,22 99:7,9,10,14 99:22 101:4,6 101:16,18 102:19,23 103:2,19 104:4 104:5,9,12 105:1,2,10 106:7,13,16 107:2,4,10,12 107:14,16,23 108:1,6,13 111:3,13,18,20 112:2,23,23 113:11 115:5 115:14,17 116:20,24 117:5,11 118:4 118:7,8,12,15 118:17 121:24 122:8 knowledge 61:8 62:6 63:18,21 64:11 66:24 67:3,14 76:7 116:17 125:3 known 101:20	106:19 knows 83:3 110:5 <hr/> L <hr/> L-E-A-P 43:19 labor 66:8 69:18 lack 63:18,21 64:22 Lake 107:15 LAKESIDE 1:22 125:23 land 104:11 language 36:24 37:16 38:4,15 38:15,19 39:15 40:6,12 41:9 43:7 58:4 64:15,17,23 69:17 large 37:21 66:19 67:8 90:6,8,12,24 larger 32:9 73:1 73:7 lasted 11:10 28:11 lastly 62:7 Latino 8:5,7 40:4,19,21 43:21 51:5,13 57:19,22 60:5 61:22 62:20 66:16,25 67:4 67:15 69:22 70:5,9,25 71:3 71:13,21 72:8 72:10,14,18 73:3,10 75:3 75:14 76:7 83:23 90:12,24 116:25 122:1,3 122:19 Latinos 62:12 63:17 64:16	65:4 68:17 69:13,14,25 71:16 72:2 123:4 law 2:15,16 77:3 77:3 laws 110:20,22 lawsuit 9:22,24 10:1 14:25 15:5,7,22 17:10,15,16,19 17:21,23 18:5 18:7 24:24 26:21,25 27:19 27:21 28:6,12 28:13,14,22 29:8,13,15 32:25 33:1,3,5 33:5,6,15,16 35:13,16,18 36:11 41:22 44:10,15,24 45:15 47:7,15 47:17,20,20,22 48:1,3,4,23 49:1 50:1,6,10 52:10,13 67:22 68:5,10,15 69:4 74:25 81:18 89:25 90:1 101:8 102:9,16 103:1 111:4 112:11 117:23 lawyer 10:18 17:13,13,13,25 34:16 109:25 lawyers 10:9,14 14:10 LD 19:9 24:3 46:10 47:13 56:14 57:3 73:24 74:24 75:3 79:10,13 79:24 80:13
--	--	--	--	---

84:14,14,18 88:12 97:16,19 97:19 101:11 103:23 105:4 107:8 108:16 109:5 117:24 117:25 118:14 LDs 104:16 leader 108:18 leaders 67:8 71:22 105:24 106:15,18 leadership 106:2 LEAP 43:19 learn 101:13 118:5,5 learned 75:24 76:4 learning 39:16 40:6 leave 27:13,13 63:6 120:1 leaving 99:13 Leeper 2:7 3:3 4:9,12 12:6 13:18 14:7,15 14:18 35:7 48:15 49:14,19 49:24,25 82:7 109:12,18,21 118:23 119:5,8 119:10,22 120:5,7 122:21 122:25 left 55:8 Leg 95:19 legal 2:6,9,10 17:22,25 25:2 33:1 109:23,25 110:4 116:4 legislative 26:25 27:4,6,19 50:16 76:9 77:12,20 78:11 78:25 79:4,6	87:21 91:24 99:4,6 101:10 103:22 108:6 113:6 121:25 legislator 40:13 42:15 43:15 50:5,7 54:16 55:6,8 82:24 82:25 83:4,5,9 83:17 legislators 15:21 30:19 50:11 51:5,15 57:13 57:16 71:25 80:25 81:7,8 106:20 107:6 legislature 42:16 79:10 108:6 121:1 122:12 lens 36:25 37:16 41:2 let's 39:20 49:19 49:24 51:7 52:17 60:16 64:3 87:5 105:24 109:18 118:25 119:8 letter 35:3 letting 119:2 level 7:17 89:2 levels 50:21 License 124:23 life 53:12 likability 76:12 likeable 72:22 liked 72:20 96:3 likes 72:17,18 liking 96:5 limits 67:18 Lincoln 21:9 28:21,25 29:3 29:4 32:8,10 39:20 88:6,7 88:10,18,21,21 88:22 89:16,17	89:18 97:2 112:7 line 6:11,12,20 86:7 125:5 lines 12:1 21:15 29:5 48:6 77:8 77:9 83:6,19 84:5,7 103:2,4 103:12 110:17 111:12,16,23 112:3 118:3 list 45:16,17 120:24 listed 125:4 listened 85:3,5 listening 83:3 Litigation 2:22 little 5:4,7,25 6:6 12:9,9 14:9 24:11 32:22 33:3 37:6 40:8 52:17 58:13 64:17 68:2 72:15 78:21 95:2 103:8 106:16 114:7 115:1 117:9,13 117:14 live 18:22 22:5,5 33:12 51:1 52:24 67:24 68:22 69:9 76:22 77:23 78:25 79:15,16 79:17 84:11 91:5 99:22,22 106:9 110:23 111:20,23 lived 19:3 53:1,6 53:7 71:7 75:4 79:3,6 lives 100:17 111:23,24 Lizette 46:13 LLC 2:3	located 54:23 long 6:5 11:6,9 17:2 26:14 27:9,10 28:11 53:11 63:9 85:4 91:9,12 91:14,22 longer 30:22 66:17 67:19 look 5:18 49:9 52:7 56:22 61:13 64:3 74:16 76:2 83:6 94:10 98:8 103:16 111:13,14 114:15,17,20 115:9 looked 23:24 25:25 70:7,24 70:25 71:3,3 73:25 74:1,18 74:19,20,23 75:6 93:24 looking 23:18 25:1 44:2 73:21 81:9 83:10 107:9,24 looks 103:16 Lopez 46:2 lose 19:3 21:8,13 28:21 29:20 33:24,25 34:3 48:6 80:2 81:3 81:15 87:23 88:2,7,8,10,11 88:15 89:10 99:24 100:21 losing 28:25 29:3 88:4,6 90:23 lost 19:15 32:10 81:4,8 82:8 88:18,21,22 89:16,17,18	lot 17:25 19:2,12 29:24 33:11 37:12,21 55:11 59:14,14 60:17 61:9,24 62:5 62:22 63:2 67:2 68:17 73:1,15 76:13 80:23 90:15 97:6 100:7 104:11 106:14 106:25 108:1,6 109:2 117:1,7 117:13,19 118:4,8,12 lots 51:2 59:14 69:20 81:16 90:19 91:13 110:4 116:22 116:22,23,23 117:3,3,3,4,4 loud 5:20 love 4:25 loves 76:15 low 65:16 lower 63:17 64:16 lucky 55:13 <hr/> M M 1:22 4:8 120:9 121:20 124:22 125:23 Mabton 117:5,7 117:9,20 Macias 45:25 mail 58:18 Main 2:4 major 100:16 majority 40:21 making 37:7 59:4 110:9 man 88:10 manages 104:11 manipulate 93:2
--	---	---	---	---

manipulating 97:21	89:12,21 90:18 90:24 96:8,12 98:22 99:12,18	91:10 106:25 107:13 108:7	66:12,18 Mike 108:24,25 109:2,2	53:8,9 54:9 movement 19:18
manner 124:10	100:1,2,4,6,9 100:12,18,22	member 7:5 79:18	miles 91:13 99:21 100:8,17	moving 21:18 66:13 93:5,5
manual 69:18	103:6,14,16 104:1,2,6,10	members 15:15 44:4	100:17	Mulji 2:9 4:23
map 20:6 22:22 24:3 34:5 50:3 50:12 81:19,22 82:4,11,22 84:2,4,9 86:4 86:16 87:15,15 93:2 94:1 95:2 96:1,8,10,19 96:20 98:13,14 98:16 111:21 121:8	112:6 117:25 118:13 Mattawa/Sch... 18:12 matter 16:11 17:7 23:8 36:9 36:18,18,19,21 50:2 51:6 71:7 73:10 81:23 83:6,16 84:4 84:20 98:2 122:10,11 mayor 42:21,23 44:8 63:8 64:3 mayor's 72:13 72:14 MBA 53:22 mean 25:9 48:24 62:2 64:22 72:20 84:17 99:7,7 110:5 112:5 117:2 means 9:4 17:14 17:23 75:19	memory 8:23 9:1 26:23 mention 14:25 48:24 56:20 mentioned 6:16 6:25 11:20 15:4 17:5 18:11 21:4 22:1 29:15,16 29:17 30:23 34:9 40:10,17 42:10 52:3 57:25 61:18 66:11 85:6 86:18 99:4 102:11,13 112:22 mentioning 27:8 106:6 message 113:12 messages 25:10 113:4,21 messaging 113:9 messes 97:22 met 4:11 44:12 45:3,5,8 46:25 47:6 85:19 101:22,23 method 28:1 112:21 Mexican 8:3 36:6,14,14 41:2 Mexico 69:19 Microsoft 113:12 middle 6:11 80:9 91:6 migrant 63:4,8	mind 9:11,15 13:7 64:12 mine 35:5 71:22 72:23 minutes 28:12 missed 16:14 misstates 82:5 mistaken 75:2 mixed 47:20 mom 37:7,13 64:3 71:20 mom's 64:1 moment 9:13 23:24 114:2 119:5 Monday 1:20 13:2 16:23 17:1 month 102:14 months 63:6,7,7 66:5,13,13 Morfin 2:15,16 2:16 46:15 morning 4:10 Moses 107:15 Motion 26:7 motions 124:17 mountain 91:20 mountains 78:3 91:4,22 move 18:17 21:12 48:6 66:10 86:13 93:17 95:1,1,3 97:24 111:24 moved 18:14 19:6,9,23,24 20:15 21:7 32:1 33:19	muted 39:11 <hr/> N N 2:1 4:8,8 120:9,9 121:20 121:20 Naches 90:15 96:24 name 4:11 7:18 10:19 16:14,16 24:22 45:7,8 47:12 55:24,25 56:19 105:22 109:24 120:11 named 42:17 45:1 46:17 124:6 names 55:10 92:2,3 105:11 105:20 108:11 108:14,19 native 22:1 need 6:6 9:13 13:21 30:3,3,6 30:9 39:15,22 39:23 41:9 66:4,7 89:23 98:22,22,23,23 103:19 104:15 115:20 needed 58:25 64:13 74:21,21 89:16 97:5,6 needing 6:8 needs 39:2,24 40:23 84:1,9 104:1,2 122:2 122:18 123:3 negative 118:14 neglected

Alex Ybarra

December 5, 2022

Page 137

120:21 nerds 93:9 net 118:14,14 never 32:7 58:19 58:25 63:14 82:15 99:12 105:2 new 18:12 19:13 29:23 30:9,19 31:20 80:8,18 80:23 81:7,8 86:7 118:3,3 Newhouse's 46:20 news 75:8 newspaper 33:20 35:24 75:2 90:3,5,21 nice 120:19,19 night 13:2 Nikki 101:16,25 102:9 103:22 105:21 108:15 108:22 109:3 109:10 nine 56:7,8 Nodded 30:25 35:6 89:19 nodding 5:18 nonprofit 43:21 Nope 46:5 75:13 north 20:18 97:5 Northwest 2:11 nos 5:20 note 6:18 noted 6:21 124:11 notes 11:18,21 12:3,3 46:9 119:2 November 74:8 109:24 110:13 number 3:10 59:25 121:25 numbering	84:14,15 numbers 75:6 84:17 88:20 93:16,16 96:15 96:21 <hr/> O O 4:8 120:9 121:20 oath 4:5 8:17 9:3 oaths 124:5 object 6:20 34:23 48:13 122:21 objection 6:21 82:5 123:17 objections 3:11 3:13 79:12,14 124:9,17 observed 71:9 122:23 123:2 obviously 4:16 12:14 33:8 38:24 86:6 100:22 108:9 110:3 121:24 occur 10:20 16:6 105:9 occurred 20:4 22:16 occurring 20:11 October 115:14 office 46:10 55:2 55:21 58:1,11 59:2 68:17 70:13,16 76:5 103:10,12 120:3,13 121:17 offices 19:2 56:3 official 1:9 9:22 10:2 69:12 83:13 121:1,3 officials 50:8,11 83:12	Oh 14:24 25:20 56:10,18 59:20 61:6 64:8 88:10 89:25 94:13 99:23 102:7 110:11 112:19 114:3 114:16,19,19 116:22 120:17 120:19 121:15 121:19 okay 4:10 5:4,16 6:16,25 7:11 7:14,16 10:10 11:15 12:11,21 12:25 14:7,18 15:2 16:10,20 20:10,25 22:8 22:25 24:2,11 26:1 32:18,22 41:11 45:11,14 45:21 49:21 54:14 57:17 58:4,8 59:7,23 60:15 61:18 62:11 63:23 64:3,8,24 65:2 66:21 68:14 69:25 70:20 71:2,8 73:17 75:10 77:1 84:21 85:12 87:10 88:25 91:18 93:11 95:24 107:24 109:12,15 110:15 112:3,9 113:25 114:7 114:11,16,21 114:23 115:10 116:4,13,19 117:17,22 118:23 119:8 119:20,22 120:6,8 121:11	121:13 123:18 123:20,22,23 old 53:14 66:3 older 62:17 Olympia 54:20 54:23 once 22:19,21 27:25 35:5 43:1 85:19 ones 24:20 68:23 123:6 online 4:17 98:20 open 12:16,18 49:9 opens 31:20 opinion 18:5,7 73:3 75:14 76:20 109:8 118:21 opinions 28:17 28:19 72:5,6,8 opponent 56:17 opportunity 5:11 109:13 119:25 124:8 opposed 56:12 56:15 57:17 59:1 ORAL 1:17 orchardists 31:9 orchards 31:25 66:2,5,22 order 90:7 100:2 organizations 107:1 original 24:22 33:5 35:12 74:4 Othello 50:20 61:6,7,11 90:9 96:14 99:10 outcome 34:4 68:25 69:3 111:10,12	117:23 124:13 outside 53:8 <hr/> P P 2:1,1 p.m 1:20 109:16 119:6,6 123:24 Padilla 46:4 PAGE 3:2 125:5 paid 97:18,20 Palmer 1:6 2:6 4:13 45:23 47:11 125:20 pamphlets 64:19 paper 17:18 78:13 papers 68:16 park 30:10 Parra 46:13 part 9:3 14:25 15:4,7,22 18:14 21:18 24:23 29:15 30:24 32:9,10 33:12 43:3 59:7 77:5 80:2 80:8 88:4 89:16 90:24 91:14 96:19 102:12,17 part-time 54:15 54:16 particular 40:23 41:15 50:22 63:15 68:22,24 68:24 69:6 72:3,9 77:11 77:24 97:16,18 98:6 105:17 108:21 112:25 116:24 particularly 44:6 107:7 parties 26:2 124:9,12
---	---	---	---	--

partisan 101:24 102:2	88:24 89:4,5 89:15 92:1	piece 36:4 80:9 pieces 78:7	populations 93:5 104:3	98:13,14,16,19 98:25
parts 32:15,21 33:8 36:3,9 50:4,5 67:15 90:11	93:17 97:6,8 98:21,24 99:9 102:24 103:19 104:1,24	place 66:10,13 66:14 121:15 plaintiff 45:18 45:19	portion 96:18 portions 21:9 29:21 position 13:19 23:8,10 46:20 50:2,3,4,12 55:17 56:9 84:8,10 107:25 109:6	preparation 24:13,17 25:4 25:14,15 124:18
party 9:21 15:15 34:19 52:9 56:19 73:4,5 73:10 124:11	105:11,13 106:6,12,12,16 106:21 107:1,4 107:5,17,21 108:1,13,13 110:23 112:25 113:3	plaintiffs 1:7 2:6 2:15 4:12 45:14 115:6 plaintiffs' 3:11 3:13 4:21 26:4 26:7	positions 55:2 positive 118:14 118:21,22 possible 13:24 40:16 86:13 post 109:9,10 postgraduate 53:21 potential 105:17 potentially 19:3 21:8 54:24 88:2 106:20 poverty 117:4 117:14,15,15 117:16	prepare 10:5 11:2,8 24:15 26:12 prepared 124:18 preparing 26:15 94:16
Pasco 8:13 59:19 60:7,16 61:1,23 62:3,3 69:25	percent 37:24 39:19,23 59:24 59:24 60:9 61:16,25 65:14 65:15,17 71:11 117:15,16	plan 121:1,4 planets 54:6 planned 49:12 plants 55:1 platforms 113:9 played 96:16 playing 96:15,25 98:4	positions 55:2 positive 118:14 118:21,22 possible 13:24 40:16 86:13 post 109:9,10 postgraduate 53:21 potential 105:17 potentially 19:3 21:8 54:24 88:2 106:20 poverty 117:4 117:14,15,15 117:16	presence 54:22 present 10:17 23:3,25 28:9 president 101:19 presumed 70:25 pretty 23:13 31:23 51:10 66:1 68:7 99:1 112:22 117:8
pass 91:22 passage 22:16 passed 20:1 passes 91:20 patterns 66:25 67:4,14 68:3 70:4 71:12 74:20	percentage 62:23 periods 66:17 person 10:4 28:2 28:4,4 38:16 42:7 44:17 63:9 68:24 74:2 101:20 108:25	plan 121:1,4 planets 54:6 planned 49:12 plants 55:1 platforms 113:9 played 96:16 playing 96:15,25 98:4 plays 64:15 please 5:24 7:18 31:6 39:13 52:12 63:25 88:1 102:7 PLLC 2:16 point 92:16 94:9 111:5	positions 55:2 positive 118:14 118:21,22 possible 13:24 40:16 86:13 post 109:9,10 postgraduate 53:21 potential 105:17 potentially 19:3 21:8 54:24 88:2 106:20 poverty 117:4 117:14,15,15 117:16	prevalence 39:15 prevalent 39:4 40:2
Paul 19:21,22,23 20:14 21:24 22:8,12 23:3 85:7,24 86:10 86:10 90:23 92:7,8,9,13 94:16,22,22 112:23	personal 9:22 10:2 95:18,22 113:15 personally 36:17 38:21 84:8 Phillips 2:9 4:22 Phoenix 53:22 phone 10:4 20:8 20:8,9 22:25 39:7,10 44:13 44:19,21 87:4 87:6,8,11 92:6 92:12 112:20 112:25	polarized 75:18 political 15:15 polls 75:14 pop 108:14 popping 108:12 popular 42:24 population 22:2 37:21 38:11 39:21 50:21,23 60:4 61:22 62:12,13,20 64:25 65:1,3,4 65:12,17 66:12 66:19 67:8 84:7 89:13 90:7,7,9,12,25 97:4,7	precinct 70:22 71:2 93:16,16 93:17 95:1,2 precincts 68:20 71:3,6 95:3 predominant 50:16 prefer 7:25 73:4 76:8 80:2 86:13 103:4 preference 21:18 preferences 75:22 108:19 preferred 97:1,2 preliminary 26:7 86:4,25 87:15 88:8 92:7 94:12,12	prevention 44:2 previous 9:10,13 Priest 19:1 22:6 primary 72:16 principals 7:6 printed 14:2 printing 75:1,2 prior 20:5 22:16 31:2,16 42:11 44:10,14 48:15 67:25 79:3,6 85:18 86:4 101:24 105:12 105:13 privilege 48:14 privileged 34:24 48:11 probably 7:23 10:22 28:4
pause 6:17,19 paying 97:15 116:4,10 pending 6:10 people 4:21 15:1 19:14 21:12 23:20 26:22 55:24,24 62:5 64:10,11,20 66:1 67:24 68:22 70:9 72:8,23,24 73:3,8,9 74:14 75:1 76:17 77:10 88:19,19	percentage 62:23 periods 66:17 person 10:4 28:2 28:4,4 38:16 42:7 44:17 63:9 68:24 74:2 101:20 108:25 personal 9:22 10:2 95:18,22 113:15 personally 36:17 38:21 84:8 Phillips 2:9 4:22 Phoenix 53:22 phone 10:4 20:8 20:8,9 22:25 39:7,10 44:13 44:19,21 87:4 87:6,8,11 92:6 92:12 112:20 112:25 phrase 35:7 physical 78:2 pick 100:4	piece 36:4 80:9 pieces 78:7 place 66:10,13 66:14 121:15 plaintiff 45:18 45:19 plaintiffs 1:7 2:6 2:15 4:12 45:14 115:6 plaintiffs' 3:11 3:13 4:21 26:4 26:7 plan 121:1,4 planets 54:6 planned 49:12 plants 55:1 platforms 113:9 played 96:16 playing 96:15,25 98:4 plays 64:15 please 5:24 7:18 31:6 39:13 52:12 63:25 88:1 102:7 PLLC 2:16 point 92:16 94:9 111:5 polarized 75:18 political 15:15 polls 75:14 pop 108:14 popping 108:12 popular 42:24 population 22:2 37:21 38:11 39:21 50:21,23 60:4 61:22 62:12,13,20 64:25 65:1,3,4 65:12,17 66:12 66:19 67:8 84:7 89:13 90:7,7,9,12,25 97:4,7	populations 93:5 104:3 portion 96:18 portions 21:9 29:21 position 13:19 23:8,10 46:20 50:2,3,4,12 55:17 56:9 84:8,10 107:25 109:6 positions 55:2 positive 118:14 118:21,22 possible 13:24 40:16 86:13 post 109:9,10 postgraduate 53:21 potential 105:17 potentially 19:3 21:8 54:24 88:2 106:20 poverty 117:4 117:14,15,15 117:16 precinct 70:22 71:2 93:16,16 93:17 95:1,2 precincts 68:20 71:3,6 95:3 predominant 50:16 prefer 7:25 73:4 76:8 80:2 86:13 103:4 preference 21:18 preferences 75:22 108:19 preferred 97:1,2 preliminary 26:7 86:4,25 87:15 88:8 92:7 94:12,12	preparation 24:13,17 25:4 25:14,15 124:18 prepare 10:5 11:2,8 24:15 26:12 prepared 124:18 preparing 26:15 94:16 presence 54:22 present 10:17 23:3,25 28:9 president 101:19 presumed 70:25 pretty 23:13 31:23 51:10 66:1 68:7 99:1 112:22 117:8 prevalence 39:15 prevalent 39:4 40:2 prevention 44:2 previous 9:10,13 Priest 19:1 22:6 primary 72:16 principals 7:6 printed 14:2 printing 75:1,2 prior 20:5 22:16 31:2,16 42:11 44:10,14 48:15 67:25 79:3,6 85:18 86:4 101:24 105:12 105:13 privilege 48:14 privileged 34:24 48:11 probably 7:23 10:22 28:4

38:20 44:19,21 59:4,23 61:15 62:8 65:15,18 67:7 104:15,24 105:10 107:17 112:8 117:13 117:15 123:5 problems 34:5 proceed 13:23 Proceedings 4:1 4:2 process 55:7,11 58:23 77:2,11 77:19 78:16 79:13 85:8,22 85:25 87:12 91:25 92:17 99:5 productions 112:10 profession 40:20 promise 95:22 prompt 26:23 proper 110:20 proportionately 62:3 provide 9:8 provided 92:20 providing 9:4 proviso 44:1 public 54:12 55:2 84:23 publicly 98:5 published 98:12 98:16 PUD 18:24 22:7 54:10,11 79:16 104:11 purposes 111:9 pursuant 124:4 124:18 pursue 40:19 put 13:11 35:16 35:17 37:16 55:10 74:21	81:1 86:11 105:11 111:17 putting 59:3 80:25 81:14 118:4 puzzle 97:25 <hr/> Q qualifications 124:10 quarter 55:15 question 5:10,23 6:1,2,10,17,20 6:22 9:9 12:1,5 34:24 35:8 39:13 48:11 51:17 53:14 56:18 60:21 77:16 82:12,17 99:18 115:3 117:22 questioning 6:12 questionnaires 58:16 questions 5:19 6:11 7:16 8:20 9:5 10:10,11 12:8 17:12 25:13 26:1 33:2 34:11 46:8,9 98:21 109:22 114:15 115:6,12,16,19 115:23 118:24 119:11 120:1 121:16,17,23 123:12 124:16 quick 6:17 13:18 39:8 118:25 119:11 121:22 quickly 114:1 Quincy 7:5 9:25 37:23 38:1 39:19,23 52:20	52:20,22,24 53:10,12 54:9 56:6,25 59:9 63:5 64:4 66:3 72:13 78:24 86:7,8 87:13 98:23 106:16 QuincyROO... 95:24 quite 45:15 90:13 <hr/> R R 2:1,3 124:1 R.W 2:20 race 8:2 37:25 50:15 57:14 70:19 72:13,14 73:17,21 74:1 74:2,4,7,10,24 111:7,9 races 56:12 57:1 59:15 76:9 racial 21:23 47:13 121:9 racially 75:18 radio 42:24 43:2 43:4,7 58:4,7 107:14 radios 107:14 raised 52:22 ran 46:10 56:14 58:22,24 108:5 range 100:15,15 100:16 ranking 37:19 Rapids 19:1 22:6 rationale 23:23 RCW 124:4 RDR 1:22 124:22 125:23 reach 34:12,15 108:3 read 64:21,21	68:16 83:20 107:9 114:6 125:2 reading 17:17 really 13:15,18 20:18 38:16 39:7 50:21 58:25 60:8 63:13,14 64:7 67:1,1,17 70:23,23 84:8 91:9 97:4 110:25 111:1 117:9 119:24 123:10 reason 8:19 9:18 48:13 49:6 50:15 60:15 63:20 65:16 125:5 reasons 72:3 recall 10:19,21 11:19 15:20 16:2 19:7,12 19:17 20:5,10 20:13 21:25 22:4,23 24:1,4 24:5 27:20 28:7,10 29:12 29:17 30:5,17 41:23 42:2 44:16,16,22,24 45:9,11 46:1,3 46:14 48:18 49:3 51:17,22 56:11,19,20 57:9,15,21 58:20 74:11 75:17 84:25 85:3,4 87:9 91:1 92:9,10 92:11 94:7,11 94:23 95:13,16 95:19,21 96:13 96:18 98:9	99:3 101:9,12 103:24 104:18 108:3 113:20 113:24 receive 57:1 79:23 received 57:8,12 57:19 113:18 113:22 115:8 115:18 recognition 55:25 recollection 45:6 51:24 115:11 116:2 recommend 34:12 recommendati... 107:19 108:4 record 4:3,11,11 5:7 6:21 7:19 8:2 11:20 49:20,22,24 70:13 109:13 109:17,19 119:7,9 124:9 records 70:14 redid 67:17 redistrict 33:14 67:23 redistricted 35:22 89:7 redistricting 15:8,10 19:17 28:16 31:3,16 33:14 35:10 41:24 42:4 44:14 45:12 47:4 51:14 77:2,12,18,19 77:22 78:11,16 79:3,7,13 81:15 84:24 85:2,8,22,25 87:12 88:24
---	---	--	---	---

90:6 91:25 92:5,14,16,17 94:2,25 95:5 99:5 101:11 103:11,22 104:16 105:10 110:22 111:1 112:24 113:3,4 113:19,23 118:16 121:1 Redmond 54:1 reduced 124:7 refer 8:6 referring 8:6 17:16 regard 16:21 17:20 21:1 regarding 40:5 regards 46:11 region 8:13 66:17 116:15 Registered 1:23 124:22 regression 75:10 regular 67:19,19 reincorporation 117:25 118:13 related 48:8 99:5 112:11 113:22 121:23 relating 113:18 relation 40:17 relative 124:11 124:12 released 20:11 religion 36:19 remember 7:13 9:10 17:17,18 18:6 19:12 22:20 35:24 43:23 45:13 49:3 56:23 75:9 78:13 87:8 92:11 98:15 105:20	105:22 reminders 13:15 Remote 1:17 4:1 removed 21:16 repeat 39:13 rephrase 5:24 replace 105:4 Reported 1:22 125:23 reporter 1:23 5:8 124:4,22 REPORTING 1:22 125:23 represent 30:1 31:22 36:3,6,8 36:20 50:4,9 55:12 74:19 79:9,19 80:19 80:24 81:9,13 81:21,22,23,24 82:24 83:16,18 84:4,5,11 100:5 121:25 122:14,20 123:4 representation 36:2,12 48:16 75:5 79:22,23 83:12,23 106:3 106:10,11 116:4 representations 75:7 representative 1:14 4:10,17 7:24 9:21 10:18 14:17 15:25 16:3,11 16:13,15 17:6 17:9,12 18:2 23:7 24:8 28:8 28:17 29:10 30:15 31:15 32:23,25 34:2 34:10,13,20	35:8 36:10,18 38:10 42:11 46:20 49:25 52:4,17 60:14 86:24 87:14 93:22 96:1 105:22 109:5 109:21 119:10 119:23 120:11 120:25 representatives 15:15 29:14 30:1,18 51:10 122:18 represented 22:2 35:15 52:5 71:17 representing 17:9 36:14 79:24 represents 16:18 Republican 75:23 76:2 Republicans 77:4 request 6:9 94:9 112:14 115:5 requests 112:10 115:23 requirements 77:22 Research 54:1 reserved 123:25 residents 8:6,7 Residing 124:24 respond 23:14 123:5,21 response 5:19 23:16,17 24:6 122:6,7,10 responses 3:11 3:13 5:17 26:1 responsive 122:2,18 123:3 123:11	rest 21:5 23:20 61:17 80:25 86:8,14 result 117:24,24 resulted 79:13 results 70:18 71:8 75:21 retire 104:25 105:1 retirement 104:20 retiring 101:14 returns 70:3,7 74:9,23 review 11:15 24:17 25:4,24 92:17,21 114:14 115:2 115:19 116:1 119:2 124:8 reviewed 25:16 26:4 115:16 Richland 62:7,8 62:9 rid 21:14,15 24:7 Ridge 53:9 right 6:10 9:15 12:12 20:23 22:17 33:19 42:12 47:10 50:13 52:24 55:3,18 59:18 61:7 65:7 74:7 78:13 79:4 80:9,13 84:9 85:8 87:7,8,16 87:17 92:1 95:9 97:13 100:9,15,24 101:2 104:13 108:13 109:18 112:1 114:5 116:8 Rights 22:9	78:18 righty 114:3 River 100:1,16 104:13 roads 100:18 rocket 54:1,3 role 50:1 52:9,13 55:5 64:15 81:20 82:23 109:1 room 4:16 14:3 119:15,16 rooting 108:20 Rotary 59:9 round 79:7 routine 14:11 row 66:3,4,22 rub 97:9 rules 4:25 78:8 run 13:1 55:17 56:3,9 59:2 76:5 77:6 105:14 106:1 106:13,13 107:8 109:9,10 running 5:12 30:18 46:19 55:21 56:25 57:3,14 58:1 58:11 59:1 74:2 101:24 103:10,12 108:11 109:5 rural 20:21 31:3 31:11,12 32:11 32:16,21,21 <hr/> S S 2:1 3:9 sad 19:3 Sandlin 109:6,9 Sarah 85:17 satellites 54:4 save 95:10,14 saved 95:8,11
---	---	---	--	---

saw 46:21 70:22 75:5,8 98:14 99:2 101:22 120:15 saying 5:17 41:10 62:25 75:7 88:9 93:6 102:24 106:23 says 36:11 77:4 121:19 Schawana 18:21 schedule 27:7,12 school 7:5,6,7 9:25 30:12 37:23 38:1,10 38:19,23 39:5 39:5,16,18,24 40:1 51:2 52:19,20 53:6 56:6,6,25 63:11 79:18,18 79:19 86:8,9 86:11,12,13 87:13 104:6,8 schools 40:15 43:22 Schwana 33:12 33:25 79:15 80:3 87:23 88:11,15 89:1 89:10,12,21 90:9,18,24 96:8,12 103:6 103:16 screen 4:15 24:21 114:1,5 114:24 scroll 114:9 115:1 scrolling 112:20 search 112:17 112:17,23,23 113:6,15 searches 112:9 112:13	seat 55:8 Seattle 2:23 124:24 125:21 second 3:13 38:15 39:10,15 114:14 118:25 119:3 Secretary 1:9 4:18 45:19 121:16 see 4:15 13:21 28:4 30:2 36:25 40:19 43:18 49:9 58:16 70:4,25 79:24 81:6 82:17,20 93:7 105:24 111:25 112:24,25 113:1,4 114:5 115:10 119:5 seek 58:25 82:4 82:11 seen 25:18 73:23 74:9 109:23 110:12 114:8 114:17 Selah 32:20 50:20 Senate 107:8 122:14 senator 93:22 96:6 100:8 101:5,7,13 105:4 109:9,10 senators 51:10 122:18 send 13:10 122:5,6,6 sense 5:21 6:3 6:23 9:16 20:22 29:7 33:11 93:8 100:7,9,20,20 sent 25:23 86:5	86:21,22 87:3 93:23 98:17 110:1 116:2 September 10:22 16:7,8 20:12 115:13 serving 18:21 Session 80:22 set 3:12,14 10:10 31:20 87:5 103:12 110:25 115:22,24 124:19 sets 115:16,17 shaking 5:18 share 28:19 93:19 94:5 98:8 103:3 114:1,24 118:6 shared 98:4 sheet 12:6 125:1 shifted 65:21,22 shifts 13:3 68:8 short 54:11 shot 16:17 show 43:15 58:17 75:22 114:21 shown 43:16 shrugged 105:2 shuffle 81:8 shuttles 54:4 side 22:6 94:19 97:11 sign 105:11,13 124:8 Signal 113:10 Signature 123:25 125:18 signed 35:3 significant 31:12 36:13 signing 95:23 124:9 signs 59:3 74:21	similar 40:5 49:5 51:1,1,3 117:18 Simone 2:7 4:12 Simone's 12:1 simple 5:19 Sims 85:14 single 98:1 122:9 sir 59:22 sit 91:5 104:13 sitting 72:4 78:23 situation 113:1 Sixty-one 53:16 SLeeper@Ca... 2:12 slowly 115:1 small 62:22 72:22,25 97:4 114:6 117:9 smaller 73:2 99:10 117:8 Snoqualmie 53:9 snow 91:20 So-and-So 64:10 societies 59:8 software 77:8 93:2 94:23 95:4 solution 94:22 solve 34:4 somebody 17:11 48:23 57:15 58:22 74:6 78:12 107:21 107:21 somebody's 58:15 son 64:7 sorry 14:15 16:13 39:10 sort 13:19 18:2 25:2 26:1	32:11 37:25 41:13 49:5,11 61:19 62:11 66:12 68:5 71:3,8 75:7 77:17 83:22 87:11 100:23 104:1,22 107:2 110:7 112:15 sorts 43:9,16 76:20 Soto 1:6 2:6 4:13 45:22 47:11 125:20 sought 57:22 58:12 sound 46:16 sounds 44:8 45:7 46:7 south 80:8 Southcentral 8:12,15 40:4 59:13,17 62:13 62:20 65:4,21 67:4,15 69:22 70:4 71:13 75:15 76:10 116:15 122:15 123:3 space 54:3,4 spacecraft 54:3 54:6 Spanish 38:22 39:22 41:5 43:7 58:4 70:24 73:22 107:14,14 Spanish-spea... 40:14 58:7 64:20 speak 19:20 38:14,16 39:21 40:11 41:5 85:10,21 91:24 92:4,13 104:19
--	---	--	---	--

Alex Ybarra

December 5, 2022

Page 142

105:17 108:15 119:14,18 speaking 19:14 19:17 80:19 specific 8:10 61:21 62:13 77:19 116:14 specifically 12:3 21:1 25:13 51:12 62:19 65:1 67:3 77:20 112:16 speculation 122:22 spell 7:18 16:14 16:16 spelled 7:21 spent 26:14 93:13 Spokane 53:6 91:9 97:5 98:23 spoke 15:25 22:19,21,21 38:18,22 81:5 85:6,24 spoken 15:21 85:18 spreadsheets 70:21 SS 124:2 staff 15:13 27:1 27:19 77:7 staffers 91:24 stand 121:6 standpoint 123:7 start 37:7 51:7 77:9 108:12 111:16 started 32:24 75:1,2 93:3,6 96:24 starting 80:18 105:11	state 1:9,10,14 2:19 4:18,19 7:18 16:25 23:18 42:15,16 43:15 45:19 52:12 54:15 55:6 66:25 71:25 76:9 77:12,12,20 78:10 79:5 82:4,10,18 83:20 93:1 97:10 119:25 120:3,13 124:2 124:5 State's 121:17 stated 68:7 STATES 1:4 statewide 97:12 station 42:24 43:2,4 stationed 18:24 statistician 70:20 stay 50:13 55:17 66:9 77:24 111:25 staying 4:24 66:17 stenographica... 124:6 step 6:7 STEVEN 1:9 stick 14:3,5 Stokesbary 2:3 3:4 4:17 10:18 11:24 13:24 14:2,8 15:18 16:4,11 17:6,9 17:12 18:2 19:5 32:25 34:10,13,20,22 42:11 48:9,10 82:5 120:21 121:14,21	122:23 123:1 123:18,22 Stokesbary's 35:9 48:15 stop 96:5 Street 2:4,11 struggle 40:12 students 39:21 43:22 studied 70:3 75:14 stuff 30:9 63:12 69:6 73:7 74:17 86:21 99:23 submit 85:1 subparts 60:2 subscriptions 95:23 substantive 27:18 succeed 43:22 sudden 99:15 sued 83:11 suffer 81:11 suing 82:3,10,18 Suite 2:4,11,17 2:22 Sumner 2:4 Suncadia 120:18 support 38:6 42:25 43:12,15 43:16 47:2 52:7 58:15,17 80:23 81:1,14 82:25 83:4 118:5 supports 83:13 supposed 115:13 123:20 sure 7:7,20 14:5 17:3 23:19 25:9 31:23 40:10 52:3	59:16 60:3,25 61:2 65:9 74:20,22 76:15 77:9,23 78:2 81:7,25 83:2,8 83:15 90:13 91:18 99:1 112:6,7 115:17 117:1,8,21 119:4 123:21 surname 70:24 73:22 122:11 Susan 1:6 45:22 Sustainable 54:18 Suzy 73:12 sweat 56:24 Switching 32:22 sworn 124:14 sworn/affirmed 4:5 sybiosis 55:1,1 systems 95:11 <hr/> T <hr/> T 3:9 4:8 120:9 121:20 124:1,1 take 6:8,9,17 11:18,23 14:9 49:15 103:15 105:13 109:14 118:7,24,25 119:3 taken 124:6,17 takes 111:18 talk 5:4 14:23 16:20 17:1,20 29:13 30:14,20 35:1,4 44:22 46:24 48:11 52:17 73:14 74:21 90:23 94:16,22 98:21 103:6,9 105:3 talked 9:23	14:19 15:7 17:18,19 19:5 22:24 26:20 27:23 30:15 42:8 44:12,19 51:16 52:4 71:12,19,20,21 98:3 104:8,10 104:10 105:6 121:24 talking 5:9 16:23 24:12 27:7 29:25 35:14 37:4 41:13 45:13 48:24 51:12 62:11 65:7 92:8 93:10 94:8 96:17 108:7,12 109:4 112:3 116:14 taste 37:8 teacher 38:18,22 teachers 38:4,5 38:10,14 teaching 38:4 team 4:21 13:4 14:20 77:5,22 Teams 113:12 tell 4:5 9:3 11:21 19:22 24:2 25:21 40:8 47:24 60:8 67:6 77:1,21 81:20 103:18 104:2 107:18 telling 21:14 39:14 86:25 ten 39:21 57:10 67:22 93:16 ten-minute 49:15 tend 66:8 73:4 76:8 term 8:11,15
--	---	---	--	--

64:25 75:18 terminology 17:23 33:1 terms 8:5,8 17:25 18:3 89:13 112:18 testified 4:6 testify 84:23 124:14 testimony 9:19 82:6 85:1 124:16 Texas 69:20 text 25:10 28:3 44:18 86:19,20 113:21 texted 86:4 texting 28:2,3 texts 87:2 112:25 113:2 thank 7:16 14:16 39:9 95:25 119:10 119:23 121:12 Thanks 39:12 56:24 theme 64:21 thereof 124:13 thing 14:11 34:7 34:9 49:2 72:22 76:12 82:14 94:25 110:2 things 5:6,8,17 12:4 14:9 25:10 26:2 30:12 31:14 39:16 43:3,12 43:16,18 68:12 69:20 75:4 78:4 81:6 91:10,20 93:7 94:17 102:20 103:20 104:9 104:12 106:14	108:8,9 110:22 123:8,12 think 7:10,15 10:22 13:8,19 15:6 16:7,14 16:15,19,22 17:10 18:11 19:24 20:8,8 21:4 22:14,18 22:21,23,24 23:17 24:6,22 26:6,14 28:3 28:24 29:15 30:15 31:14 32:24 33:2,20 33:22 34:4,20 35:12,21 36:13 37:15,18 38:9 39:14 41:4 42:20 43:6,25 44:12,20,23 45:3,5,7,8 46:19 47:19 48:3 49:14 50:18,19 51:16 52:3 55:20 56:2,10 57:16 59:11 60:9,24 61:1,1,6,13,15 61:15 62:3,4 62:10 64:15 65:22,22 67:6 67:23,25 68:25 69:5,5 70:15 72:1,10,10 73:6,11,15 75:1 76:11,12 76:13,16,18,18 76:23 78:5,12 78:12 79:21 80:16 81:3,13 81:20 82:15,23 83:10,10,11 84:1,3,13 85:3 85:11,19 86:4	86:21,21,22,24 87:2,3,4,4,8,16 87:18,19 88:22 89:14 90:17,19 92:15,22,23 93:23 94:3,11 95:5,8,10,10 95:11,15 96:1 96:3 98:7,9,11 98:12,13,13,14 98:14,18,25 100:21 102:11 102:13 106:11 106:12 108:5 108:17,17,18 109:12,25 110:11,25 111:5,12,16,17 111:22 112:14 113:7,11 114:10,17 115:6,18,21,25 117:10,18,19 117:22 118:18 118:19,20,22 119:2 120:21 121:3 122:17 thinking 36:5 82:12 third 38:17 Thirteen 57:5 thought 17:25 82:15 98:16 99:12,14 109:3 thoughts 18:16 29:10 33:23,24 69:3 102:16 103:3 three 10:15 11:12 56:10,10 63:5,6,7 66:5 66:13,13 86:1 87:11 98:20 105:8,9 115:22 115:25	three-minute 119:1 Thursday 16:22 time 11:23 14:10 22:18 26:17 37:10 47:6 49:15 58:22 85:5,19 91:19 98:14 108:5 119:11,23 124:10,17 times 7:2 10:14 10:15,16 22:11 27:23 30:23 38:14 41:6 44:13 56:8,10 56:10,11 58:9 85:24 86:1 87:5 105:6,8 tiny 14:9 today 4:24 5:8 5:13 7:25 8:17 8:20 9:3,19 10:6 27:7,12 109:22 119:11 119:13,18,24 today's 8:4 told 27:16 30:5 49:4 77:17 89:23,24,25 108:3 Tom 23:7,13 27:21 100:8 tons 89:15 90:17 111:2,2 top 9:15 13:7 56:11,20 60:6 87:9 Toppenish 116:21 117:8 117:13,16,20 Torres 101:16 101:25 102:10 103:22 105:21 108:15 109:10	tortillas 37:7,10 37:12 total 11:13 26:14 totally 117:21 touch 94:9 town 65:25 67:25 86:14 117:9,16 towns 60:12,20 66:1 104:4 track 41:11 transcribed 124:8,16 transcript 5:13 5:16 124:16,18 transient 66:12 translator 41:10 transportation 30:11 41:1 treatment 54:25 Trevino 1:13 42:18 44:8,11 Trevinos 42:19 Tri-Cities 58:6 59:20,20 60:24 62:10 101:20 106:15 107:3 107:15 trial 83:3,21 102:20 Troyer 41:19,21 42:2 48:19 104:17,19 105:3 107:7 108:4 true 124:16 125:3 truth 4:5,6,6 9:4 47:24 60:9 124:14,15,15 truthful 8:19 try 5:9,10 38:6 40:13 77:25 78:2 81:1
---	--	--	---	--

97:12 115:13 118:4 trying 10:21 30:1,2 33:7,13 36:1 37:18 42:25 43:4,4 43:18 50:6 51:16 60:21 65:9 80:20 82:12 98:15 105:25 106:16 118:8 turn 39:7 113:25 turnout 63:17 64:16 65:17 TV 58:5 twice 22:15,19 22:24 27:25 85:19 two 38:14 39:21 56:10 72:16 76:3 77:4,4 85:20 86:1 87:10 91:5,8,8 91:16 95:18 98:20 104:3 105:8,9 115:17 115:18,21,25 119:11 121:17 121:22 two-hour 91:4 two-pager 78:15 type 31:4 32:20 types 31:13 37:13 69:17 73:15 107:16 typewritten 124:7	um-hmm 5:18 69:11 100:11 115:7 unavailable 49:6 undersigned 124:4 125:2 understand 5:24 8:8,15,17 9:6 13:6 17:22 20:25 33:4,6 37:9 38:2 41:10 50:1,6 52:9,13 81:17 82:3,10,18 83:9,15 118:9 121:8 123:7,13 understanding 5:25 33:18,21 47:22 48:1 66:15 67:11 70:18 78:10 84:6 89:3 110:15 understood 6:2 74:20 undocumented 65:7,11,15,18 65:19 unfair 35:21 unfortunately 13:21 UNITED 1:4 University 53:22 unopposed 58:24 urban 32:20 USDC 125:21 use 28:1 94:8 110:4 112:21 113:9 usually 76:5 106:13,21 123:6 utilities 79:16	utility 54:12,12 54:13 <hr/> V <hr/> v 1:8 4:13 47:9 47:11,11 48:9 48:16 125:20 vacations 49:11 Valley 8:12 90:14 96:23 verbal 5:17 versions 74:15 versus 21:19 video 4:20 view 83:23 92:25 100:22 118:11,13 viewed 73:17 75:21 vigor 123:5 voice 83:22 voicemails 113:22 vote 36:17 62:17 62:22 64:8 65:11,19 67:1 67:7,9,24 68:21,23 69:6 71:1,10,11 72:2,4,7,9,9,11 73:4,4,9,13,14 76:1,17 78:22 121:2,6 voted 55:13,13 64:12 70:9,22 70:22 71:1,4 72:19 76:16,24 121:4,8 voter 63:17 64:16,19 65:16 voters 62:24 63:15 66:25 67:4,15 70:5 71:6,13 72:10 72:11 73:10	75:3,15,22 76:8,8 88:23 111:8 votes 68:1,1 76:2 voting 22:9 62:13,19 63:2 64:24 65:1,4,6 66:24 67:4,14 68:18 70:4,10 71:12 75:4,18 78:18 90:7 <hr/> W <hr/> waived 124:9 Walkinshaw 85:12 Waluke 79:17 79:19 Wanapum 18:22,25 90:9 104:5 112:5,5 112:6 want 5:1 9:14 13:11 19:24 21:21 23:11 24:8 26:21 28:18,21 30:24 33:24,25 34:3 34:15 36:7 43:14 48:4,6 58:17 74:15 78:3,5 79:14 81:10,11,25 82:1 83:2,8,15 83:19 86:23 88:7,7,10,11 91:3,3 93:7 94:9,14,18 100:4 103:14 106:10 108:25 111:15,19,25 112:5,5,6,7 114:9,12 119:3 119:25 121:22 123:15,16	wanted 33:16 54:22 58:14 70:8,9 90:6,21 90:22 106:2 110:19 111:1 116:16 Wapato 117:12 117:20 Warnick 93:22 96:6 100:8 Washington 1:4 1:10,10 2:4,11 2:17,19,21,23 4:19 7:5 8:12 8:15 20:21 31:3,7,11 40:5 42:4 44:3,3 51:11 52:20 53:3,8,9 54:1 54:22 59:13,17 60:14 62:14,21 65:5,13,21 66:25 67:5,16 69:22 70:4 71:13,18 75:15 75:15 76:6,10 77:13 78:11 79:10 84:24 85:2 93:1 97:10,14,17,21 107:11,23 108:2 116:15 116:21 117:6 122:15 123:3 124:2,4,5,18 124:23,24 125:21 Washington's 77:20 wasn't 17:3 29:1 29:2 69:12 70:10 72:21,21 97:3 99:15 103:10 106:18 108:22 109:19
--	--	--	--	---

wastewater 54:25	61:8	118:4,6,8	36:12 46:7	95:15 96:22,22
water 6:7 31:17	Whereabouts 53:5	122:13	50:4,9,20	96:25 99:23
54:25	WHEREOF 124:19	worked 18:23	59:18,20 60:4	102:23 107:6
way 13:13 14:16	White 8:6,7	18:23 34:1,16	66:7 67:16	108:17,22
23:14 50:13	62:24 63:1	43:9 53:23,25	68:4,6,9,11,11	109:25 110:3
58:13 67:20	75:22 76:8	54:1,4,9 58:23	68:18 69:8,14	112:22 113:2
68:18,21 72:5	Whites 75:25	workers 63:4,8	70:1 71:15,17	114:17 115:4
72:9 73:14	111:21	working 34:1	71:24 78:23	118:2,10
80:7,7 91:8	win 76:5 103:17	40:20 41:3	79:20,25 80:4	119:15 120:17
94:14 100:5,19	wind 52:7	43:13,25 54:16	80:4,6,11	year 16:8 46:21
111:25	window 12:19	66:9 91:25	81:14 83:8,18	49:12 55:4,5
ways 91:9	13:25	93:13 94:21	89:1,9 90:10	57:11,11 66:5
wayside 118:6	windows 12:15	118:2,21	90:11,14,14	76:16 85:20
we'll 9:14 58:16	12:18,22	works 58:13	91:15 96:19	year-around 66:8
we're 5:4,17	wins 67:13	78:14 93:25	99:8,9 100:1,2	yearly 57:10
6:10 23:17	76:19	Worley 64:6	100:5,13,19	years 34:3,17
24:23 41:12	winter 91:22	worried 30:7	105:24 106:15	38:23 53:13
50:10 61:15	witness 2:2 14:1	63:13	107:3,15	54:2,10 56:7,8
73:9 93:9	14:5 35:6	worries 39:12	Ybarra 1:14,18	67:22,22 69:1
108:12 109:19	49:18,21	60:22	3:2 4:4,10 7:20	104:24 122:13
120:23	109:15 119:4	worry 56:23	7:21,22,23,24	yeses 5:20
we've 14:19	120:2,6,8	Worthington 2:20 4:18	9:21 14:17	yesterday 120:15
26:11 34:16	121:13 123:16	wouldn't 20:22	32:23 49:25	younger 38:20
49:16 62:11	123:20,23	22:13 31:24,25	52:17 60:14	62:18
64:25 79:9	124:6,7,9,14	31:25 37:13	70:8 100:7	
98:3 121:24	124:19 125:20	79:14 103:4	109:21 114:4	
wear 114:16	women 111:22	written 24:14	114:25 119:10	
website 92:23	won 72:17	85:1	119:23 120:11	
94:2,25 95:5,9	105:21,23	wrong 37:10	120:25 125:2	
95:10 98:6	wondering 18:13 109:22		125:20	
week 11:3 16:22	words 110:4		yeah 13:17,24	
37:6	work 5:14 6:14		16:16 30:4	
weeks 49:7	13:14,16 18:24		38:3 43:14	
weigh 69:9	22:6 34:2		45:17 48:5	
went 32:7,8,8	42:16,23 46:7		51:21 52:13	
38:1 54:6	49:17 52:18		59:11 60:1	
55:10 58:6	54:15 55:1		61:6,24 64:22	
64:1 70:12,17	57:25 63:5,6		65:11 69:20	
West 2:17	66:20 78:14		70:15,15,16,16	
Western 1:4	80:23,24 81:14		71:14 72:1	
31:7 125:21	83:6 93:7 94:3		77:15 80:16,16	
WhatsApp 113:10	97:4 101:7,21		82:9,17 84:10	
wheat 31:24			84:16 87:8	
			91:7 92:2,3,4	
			93:8,9,18	

Alex Ybarra

December 5, 2022

Page 146

11:52 109:16	15th 17:11,16	25K 89:16	9
1101 2:11	18:12,14,17	2711 1:22	9:00 1:20 4:2
114 3:11,13	23:20 28:16	124:23 125:23	90 117:15
12 57:10	29:19 30:19	3	98104 2:23
12:12 109:16	33:17 48:5,5	3:22-cv-05035...	98390 2:4
12:27 119:6	52:5 79:21	1:10 125:21	99336 2:17
12:30 119:1	84:18 89:23	30 59:24 61:16	
12:31 119:6	90:7,21,22	65:17 99:21	
12:35 1:20	97:23 105:21	100:8,17	
12:39 123:24	110:20 111:2	308-14-135	
120 3:3	111:15 122:16	124:18	
121 3:4	16 54:10	35 61:16,24	
12th 86:6,7,8,12	16th 97:22	365-3376 1:23	
13 23:20 57:4	17 54:10	125:24	
73:24 78:25	18 7:15	3rd 97:22	
79:4,6,10,13	1st 49:7	4	
79:24 80:11	2	4 3:3	
88:9,12 97:16	2 3:13 114:25	40 59:24 60:9	
117:24,25	124:23	61:16,25 65:15	
118:14	20 69:1	65:17 100:17	
13th 18:14,17	20,000 97:6	400 2:11	
23:18 28:16	200 93:13,14	4th 97:22	
29:19 52:5	2000 2:22	5	
79:23 80:25	20005 2:11	5 1:20 2:4 4:1	
86:6,9,11,14	2018 55:15,15	125:22	
88:25 89:7	2019 7:15 55:16	5,000 100:6	
93:22 97:23	56:14 74:7,8	5.28.010 124:4	
121:25 122:15	2021 15:8 16:11	6	
14 84:14,18	78:16 79:3,13	6,000 89:14,20	
87:21 97:19	84:24 85:2,7	7	
99:6 104:16	85:21,25 91:25	7325 2:17	
14th 2:11 29:18	92:16 99:4	7th 88:22 97:4,5	
97:22 122:15	113:18,22	97:21	
15 17:19 19:9	2022 1:20 4:1	8	
24:3 46:10	16:9 124:20	80 117:16	
47:13 50:17	125:22	800 2:22	
54:2 56:14	2023 49:7	833 1:23 125:24	
57:3 67:22	124:23	87 37:24 39:19	
74:24 75:3	21st 20:12	39:23	
80:13 84:14	25 65:13 71:11	8th 49:7 122:16	
87:21 97:19	88:22 104:24		
99:6 101:11	25,000 88:18,19		
103:23 104:17	88:23,24 89:4		
105:4 107:8	89:5,21		
108:16 109:5			