

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, et al.,

Defendants.

JOSE TREVINO, et al.

Intervenor-Defendants.

NO. 3:22-cv-05035-RSL

DECLARATION OF NICHOLAS  
PHARRIS IN SUPPORT OF DEFENDANT  
SECRETARY OF STATE STEVEN  
HOBBS'S RESPONSE TO PLAINTIFFS'  
BRIEF IN SUPPORT OF REMEDIAL  
PROPOSALS

I, Nicholas Pharris, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am currently employed as the Support Lead for the VoteWA/TotalAddress election management system in the Elections Division of the Office of the Secretary of State, a position I have held since 2019.

2. In 2011 and 2012, I worked for the Washington State Redistricting Commission as a GIS and data analyst.

3. I served as Washington's designated Redistricting Data Liaison for the 2020 Census.

1           5.       Following the adoption of the 2021 Redistricting Commission's final plan, I  
2 worked with county election administrators to review the proposed redistricting changes and  
3 identify technical fixes to district lines necessary for effective election administration.

4           6.       I have reviewed and analyzed the block assignment and geojson files of Plaintiffs'  
5 remedial proposals, which Plaintiffs made available on December 1, 2023.

6           7.       As part of my review of Plaintiffs' remedial maps, I identified the counties  
7 affected by each proposal. Plaintiffs' Remedial Proposal 1 affects the following counties:  
8 Adams, Benton, Chelan, Clark, Douglas, Franklin, Grant, King, Klickitat, Lewis, Pierce,  
9 Thurston, and Yakima. Plaintiffs' Remedial Proposal 2 affects the following counties: Adams,  
10 Benton, Clark, Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Plaintiffs'  
11 Remedial Proposal 3 affects the following counties: Adams, Benton, Chelan, Clark, Douglas,  
12 Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Plaintiffs' Remedial Proposal 4  
13 affects the following counties: Adams, Benton, Clark, Franklin, Grant, King, Klickitat, Pierce,  
14 Thurston, and Yakima. Plaintiffs' Remedial Proposal 5 affects the following counties: Benton,  
15 Klickitat, and Yakima.

16           8.       As part of my review of Plaintiffs' proposed remedial maps, I also identified  
17 positions for which incumbents would be displaced (i.e., under which the incumbent would no  
18 longer live in the district that the incumbent currently represents). I made this determination  
19 using the same method that the Office of the Secretary of State uses to determine a candidate's  
20 eligibility to hold office, which relies on the candidate or officeholder's residential address in  
21 the voter registration database.

22           9.       Plaintiffs' Remedial Proposal 1 would have the following impacts on incumbent  
23 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current  
24 LD 12 Senator would reside in LD 7; the current LD 14 Senator and Representative, Position 1  
25 would reside in LD 15; the current LD 14 Representative, Position 2 would reside in LD 17; the  
26

1 current LD 15 Senator would reside in LD 16; and the current LD 31 Senator and Representative,  
 2 Position 1 would reside in LD 5.

3 10. Plaintiffs' Remedial Proposal 2 would have the following impacts on incumbent  
 4 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current  
 5 LD 14 Senator and Representative, Position 1 would reside in LD 15; the current LD 14  
 6 Representative, Position 2 would reside in LD 17; and the current LD 15 Senator would reside  
 7 in LD 16.

8 11. Plaintiffs' Remedial Proposal 3 would have the following impacts on incumbent  
 9 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current  
 10 LD 12 Senator would reside in LD 7; the current LD 14 Senator and Representative, Position 1  
 11 would reside in LD 15; the current LD 14 Representative, Position 2 would reside in LD 17; the  
 12 current LD 15 Senator would reside in LD 16; and the current LD 31 Senator would reside in  
 13 LD 5.

14 12. Plaintiffs' Remedial Proposal 4 would have the following impacts on incumbent  
 15 officeholders: The current LD 8 Representative, Position 1 would reside in LD 16; the current  
 16 LD 14 Senator and Representative, Position 1 would reside in LD 15; the current LD 14  
 17 Representative, Position 2 would reside in LD 17; and the current LD 15 Senator would reside  
 18 in LD 16.

19 13. Plaintiffs' Remedial Proposal 5 would have the following impacts on incumbent  
 20 officeholders: The current LD 14 Representative, Position 1 would reside in LD 13; the current  
 21 LD 14 Representative, Position 2 would reside in LD 16; and the current LD 15 Representatives,  
 22 Positions 1 and 2, would reside in LD 14.

1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States that the foregoing is true and correct.

3 SIGNED this 21st day of December 2023, at Olympia, Washington.

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5  
6 NICHOLAS PHARRIS  
VoteWA Support Lead

**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 22nd day of December 2023, at Olympia, Washington.

*s/ Leena Vanderwood*  
Leena Vanderwood  
*Paralegal*  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 753-6200  
Leena.Vanderwood@atg.wa.gov