

In The Matter Of:
Kootenai County Republican v.
Gookin

Brent F. Regan - Confidential
June 25, 2024
Case No. CV28-23-6601

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Page 1

1
2 IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT
3 OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF KOOTENAI
4
5 KOOTENAI COUNTY REPUBLICAN)
6 CENTRAL COMMITTEE, a)
7 political action committee,) Case No. CV28-23-6601
8 Plaintiff,)
9 vs.)
10 DAN GOOKIN, in his individual) CONFIDENTIAL TRANSCRIPT
11 capacity,)
12 Defendant.)
13 _____)
14
15
16 REMOTE 30(b)(6) DEPOSITION OF
17 KOOTENAI COUNTY REPUBLICAN CENTRAL COMMITTEE,
18 TESTIMONY OF BRENT F. REGAN
19 TAKEN JUNE 25, 2024
20
21
22 REPORTED REMOTELY BY:
23 JAHNENE ADMIRE, CSR No. 760, RPR
24 Notary Public
25

Page 2

1 THE REMOTE 30(b)(6) DEPOSITION OF KOOTENAI
2 COUNTY REPUBLICAN CENTRAL COMMITTEE, TESTIMONY OF BRENT
3 F. REGAN was taken on behalf of the Defendant via remote
4 videoconference, commencing at 10:03 a.m., PST, on
5 June 25, 2024, before Jahnene Admire, Certified
6 Shorthand Reporter and Notary Public within and for the
7 State of Idaho, in the above-entitled matter.
8 APPEARANCES:
9 For Plaintiff:
10 (Present remotely)
11 Dhillon Law Group, Inc.
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18 (Present remotely)
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24 bds@eidaholaw.com
25 (Appearances continued.)

Page 3

1 For Defendant:
2 (Present remotely)
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4 BY MICHAEL L. HAMAN
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6 Coeur d'Alene, Idaho 83816-2155
7 (208) 667-6287
8 mlhaman.law@gmail.com
9
10 ALSO PRESENT REMOTELY: Dan Gookin
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Page 4

1 I N D E X
2 TESTIMONY OF BRENT F. REGAN PAGE
3 Examination by Mr. Haman 6
4 Examination by Mr. Franklin-Murdock 122
5
6 E X H I B I T S
7 NO. DESCRIPTION PAGE
8 (No Exhibits Marked.)
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Page 5

1 **THE COURT REPORTER:** The attorneys
 2 participating in this proceeding acknowledge that I am
 3 not physically present in the proceeding room and that I
 4 will be reporting this proceeding remotely. They
 5 further acknowledge that the witness will be sworn in
 6 remotely by me and that the testimony will have the same
 7 force and effect under the rules as an in-person
 8 deposition. The parties and their counsel consent to
 9 this arrangement and waive any objections to this manner
 10 of reporting.
 11 Please indicate your agreement by stating your
 12 name and your agreement on the record. Also, if there
 13 is anyone present in the room with you not on video,
 14 please so indicate.
 15 **MR. HAMAN:** Mike Haman for the defendant. No
 16 one's in the room with me. I agree.
 17 **MR. FRANKLIN-MURDOCK:** Jesse Franklin-Murdock,
 18 Dhillon Law Group, for the plaintiff. No one's in the
 19 room with me, and I agree.
 20 **THE WITNESS:** Brent Regan, and no one's in the
 21 room with me.
 22 **MR. SMITH:** Bryan Smith, local counsel for
 23 plaintiff. And no one's here with me. Nobody wants to
 24 be with me.
 25 ///

Page 6

1 BRENT F. REGAN,
 2 first duly sworn to tell the truth relating to said
 3 cause, testified remotely as follows:
 4 **EXAMINATION**
 5 **QUESTIONS BY MR. HAMAN:**
 6 Q. Good morning. Can you please state your full
 7 name for the court reporter.
 8 **A. Brent Ford Regan.**
 9 Q. And your date of birth, please.
 10 **A. 7/4/58.**
 11 Q. And, Mr. Regan, I just want to confirm that
 12 you are the designated speaking agent for the plaintiff,
 13 the Kootenai County Republican Central Committee, in
 14 this deposition; is that correct?
 15 **A. Yes.**
 16 Q. And just so I have a clear record, what is
 17 your position with KCRCC?
 18 **A. I'm the chairman.**
 19 Q. And you're familiar with the scope of this
 20 deposition, which are the claims in the complaint by the
 21 KCRCC against Dan Gookin; correct?
 22 **A. Yes.**
 23 Q. Just briefly, what is your -- just a little
 24 background of you, even though this deposition is of the
 25 party; did you go to high school?

Page 7

1 **A. I'm sorry, say it again.**
 2 Q. Did you go to high school?
 3 **A. Yes.**
 4 Q. And did you graduate?
 5 **A. Yes.**
 6 Q. And where did you graduate from?
 7 **A. It was Burlingame High School.**
 8 Q. Say that again.
 9 **A. Burlingame.**
 10 Q. Where's that at?
 11 **A. Burlingame, California.**
 12 Q. So would that have been '76?
 13 **A. '75.**
 14 Q. And did you go to college following that?
 15 **A. Yes.**
 16 Q. And where did you go?
 17 **A. College of San Mateo.**
 18 Q. Did you receive a degree?
 19 **A. Yes.**
 20 Q. In what?
 21 **A. Electronics engineering.**
 22 Q. And would that have been in 1980?
 23 **A. 1978.**
 24 Q. Okay. And any other institutes of higher
 25 learning?

Page 8

1 **A. No.**
 2 Q. Were you in the military?
 3 **A. No.**
 4 Q. Have you held public office before?
 5 **A. Yes.**
 6 Q. Can you tell me about that the number of times
 7 and when?
 8 **A. It was approximately 2013. I was a school**
 9 **board trustee for the Coeur d'Alene School District 271.**
 10 Q. And how long did you have that position?
 11 **A. Six months.**
 12 Q. And that's the only elected position of --
 13 publicly-elected position?
 14 **A. Yes.**
 15 Q. And then turning to the plaintiff, the KCRCC,
 16 just for the record, what is the Kootenai County
 17 Republican Central Committee? In other words, what is
 18 its function?
 19 **A. The function is defined in law and also the**
 20 **State party rules. It's -- your question's a little**
 21 **vague. Can you be more specific?**
 22 Q. Is it a PAC?
 23 **A. Yes, it is.**
 24 Q. Okay. And what purpose does it serve?
 25 **A. Our mission statement is on the website.**

Page 9

1 Q. Can you tell me, to the best of your
2 knowledge, what it serves?
3 A. **It's to implement the Republican Party**
4 **platform as public policy.**
5 Q. And how do you -- when I say "you," unless I
6 say otherwise, I'm referring to the KCRCC -- how do you
7 go about achieving that goal?
8 A. **Through finding and promoting and electing --**
9 **helping to get elected candidates for office.**
10 Q. And that's part of the rating and vetting
11 process?
12 A. **That is part of it.**
13 Q. And when did you become a member of the KCR-
14 -- you being -- you personally become a member of the
15 KCRCC?
16 A. **I believe it was 2014.**
17 Q. What positions have you personally held in the
18 -- so tell me, sort of walk me through from 2014 to the
19 present your titles.
20 A. **I'm a precinct committeeman and also the**
21 **chairman.**
22 Q. And were you a precinct committeeman in 2014,
23 or did you just become a member and then become a
24 precinct committeeman? In other words, how does this
25 work?

Page 10

1 A. **How does the -- I'm sorry.**
2 Q. Can I -- for example, can anyone become a
3 member of KCRCC?
4 A. **No.**
5 Q. Who decides who becomes a member and who
6 doesn't?
7 A. **The voters in a particular precinct will elect**
8 **a precinct committeeman during the primary election.**
9 Q. Okay. So the precinct committeemen are the
10 members, or precinct committeewomen, as well?
11 A. **Correct. That's defined by State law.**
12 Q. Okay. So there are no people -- there's no --
13 again, I'm naive about this, so that's why I'm learning
14 from you. So the KCRCC is composed of -- its membership
15 is -- each member is a precinct committeeperson?
16 A. **Yes. And with the exception that the body,**
17 **the committee, can elect other people to fill vacancies**
18 **and to fill positions in the Central Committee.**
19 Q. Okay. And so that's where I was going to go
20 next. Well, let me finish this. So you were elected as
21 precinct committeeperson in 2014?
22 A. **Correct.**
23 Q. And for what precinct?
24 A. **At the time it was 61, but after redistricting**
25 **it's 205.**

Page 11

1 Q. Okay. And then at some point in time did you
2 become a member of a committee within the KCRCC?
3 A. **Well, as chairman, I am a member of every**
4 **standing committee.**
5 Q. Okay. And when did you become chairman?
6 A. **2014.**
7 Q. Okay. And when you say "chairman," is there
8 -- is that the title is chairman, or is it executive
9 chairman or just chairman?
10 A. **Chairman. It's defined in our bylaws.**
11 Q. So I'm sort of doing a little box chart. And
12 so the KCRCC is -- has an Executive Committee?
13 A. **Yes, it does.**
14 Q. Okay. And the Executive Committee includes
15 yourself as the chairman?
16 A. **Yes, it does.**
17 Q. And I assume the Executive Committee has other
18 individuals, like a secretary and whatnot?
19 A. **Correct.**
20 Q. Okay. And then are there -- what's -- what
21 committees report to the Executive Committee?
22 A. **None of them.**
23 Q. Well -- okay. What other committees are there
24 within the KCRCC? I think you mentioned Central
25 Committee?

Page 12

1 A. **Correct. Hang on.**
2 **MR. FRANKLIN-MURDOCK:** Frank, you can just
3 answer based on what you know sitting here today.
4 **THE WITNESS:** Okay. Well, there's -- under
5 our bylaws there's the Budget Committee, Recruitment
6 Committee, Rating and Vetting Committee, Campaign
7 Committee, Legislative Committee, Parade and Events
8 Committee, the Fair Committee, and the Lincoln Day
9 Committee. And all those report directly to the general
10 assembly.
11 Q. (BY MR. HAMAN) And are you on each of those
12 committees, as well?
13 A. **As chairman, yes.**
14 Q. Okay.
15 A. **I'm not chairman of those committees, but as**
16 **the chairman as a member of each committee.**
17 Q. And what was it that you were looking at just
18 now to help answer that question?
19 A. **Our bylaws.**
20 Q. Are the bylaws posted on the website?
21 A. **I'm not sure if they're posted on the website,**
22 **but they are posted on the Idaho GOP website.**
23 Q. And so your -- maybe help me understand your
24 duties as a chairman. It sounds like your duties
25 include overseeing the Executive Committee?

Page 13

1 A. "Oversight" is probably the wrong word.
 2 Q. What would you use?
 3 THE COURT REPORTER: I'm sorry, say that
 4 again.
 5 THE WITNESS: "Oversight" is probably the
 6 wrong word.
 7 Q. (BY MR. HAMAN) What word would you use?
 8 A. The chairman has specific duties; they run the
 9 meeting.
 10 Q. The duties of the chairman defined in the
 11 bylaws?
 12 A. Correct.
 13 Q. And the duties of -- the members of each, I'm
 14 going to call it a subcommittee, Budget, Recruitment,
 15 Rating and Vetting, et cetera, those are also defined in
 16 the bylaws?
 17 A. Correct.
 18 Q. That shortcuts quite a bit, then.
 19 What are the duties of a precinct
 20 committeeperson?
 21 A. The precinct committeeperson's
 22 responsibilities, they're the interface between the
 23 members -- the Republican voters and their precinct and
 24 the Central Committee.
 25 Q. And in their capacity, do they make proposals

Page 14

1 that advance the goals of the KCRCC?
 2 A. They can.
 3 Q. And those proposals are made at public
 4 meetings?
 5 A. They are.
 6 Q. And during, for example, let's say a
 7 resolution is proposed, the members can criticize,
 8 advocate, or oppose a resolution; correct?
 9 A. Yes.
 10 Q. And there are minutes kept of these meetings?
 11 A. Yes.
 12 Q. What is the purpose of the Legal Defense Fund?
 13 A. The Legal Defense Fund was set up to provide
 14 legal defense and be our legal arm of the committee.
 15 Q. Does that include prosecuting claims?
 16 A. Yes.
 17 Q. Such as this matter?
 18 A. Correct.
 19 Q. Has the KCRCC prosecuted a claim before this
 20 matter?
 21 A. No.
 22 Q. So this is the first time the KCC -- KCRCC has
 23 been a plaintiff in a civil suit?
 24 A. Yes. Well, during my term.
 25 Q. Okay. Fair. Thank you.

Page 15

1 How is it funded?
 2 A. Donations.
 3 Q. Exclusive?
 4 A. Yes.
 5 Q. And do you keep records of people or
 6 businesses or entities who have donated to the Legal
 7 Defense Fund?
 8 A. Bank records.
 9 Q. And those bank records would include the
 10 identity of the persons and entities; correct?
 11 A. It would be part of the deposit, yes, I
 12 believe so. I'd have to check with the treasurer.
 13 Q. I'm sorry, I didn't mean to --
 14 A. I said I would have to check with the
 15 treasurer.
 16 Q. Who is the treasurer?
 17 A. At the time it was Elaine Price. Currently,
 18 it is Walt Sackman.
 19 Q. "At the time" meaning when this suit was
 20 initiated?
 21 A. Well, prior to May 29th, it was Elaine Price.
 22 After that, when we reorganized, Walt Sackman was
 23 elected treasurer.
 24 Q. And you would have the check with Walt to see
 25 if the records identified the names of businesses or

Page 16

1 entities or people who have donated and the amount of
 2 donations?
 3 A. Correct. Actually, it would have to be with
 4 Elaine. She was the treasurer at the time.
 5 Q. Well, would Walt have access to that
 6 information now?
 7 A. I don't know.
 8 Q. Where are the record kept?
 9 A. The treasurer would have them.
 10 Q. And where does the treasurer keep those
 11 records?
 12 A. I don't know.
 13 Q. Where does the KCRCC meet when it has meetings
 14 with the entire membership?
 15 A. At the County Administration Building,
 16 typically.
 17 Q. Does the KCRCC have its own office, its own
 18 address?
 19 A. Post office box.
 20 Q. So the treasurer would not have a central
 21 location to where he or she could have files and keep
 22 things in storage?
 23 A. KCRCC does have a storage facility, but not an
 24 office.
 25 Q. Where's the storage facility located?

Page 17

1 A. It's in Hayden.
 2 Q. What's the address, if you know?
 3 A. Not off the top of my head.
 4 Q. Is that the only storage facility you're aware
 5 of?
 6 A. Yes.
 7 Q. And has that been the storage facility for at
 8 least the last three, four years?
 9 A. Yes.
 10 Q. Who oversees or manages the Legal Defense
 11 Fund?
 12 A. The Executive Committee.
 13 Q. Hold on. I think there was an objection.
 14 MR. FRANKLIN-MURDOCK: Object to form.
 15 You can answer.
 16 Q. (BY MR. HAMAN) I believe you said the
 17 Executive Committee oversees the Legal Defense Fund?
 18 A. Yes.
 19 Q. Is there a particular person on the Executive
 20 Committee that has oversight of the Legal Defense Fund?
 21 A. No.
 22 Q. So the Executive Committee would -- including
 23 -- is the treasurer on the Executive Committee?
 24 A. Correct.
 25 Q. And so the treasurer would be able to keep

Page 18

1 track of donations that come in and the names of donors?
 2 MR. FRANKLIN-MURDOCK: Object to form.
 3 You can answer.
 4 THE WITNESS: As I said, I would assume so.
 5 Q. (BY MR. HAMAN) Who has access to the funds?
 6 A. The treasurer and --
 7 Q. Anyone else?
 8 THE COURT REPORTER: And who?
 9 THE WITNESS: And myself.
 10 Q. (BY MR. HAMAN) And I apologize. Because of
 11 the nature of doing depositions by Zoom, which has sort
 12 of come about since COVID, sometimes there's overlap.
 13 It's not like we're in person. It can be convenient,
 14 but it also has a little bit of drawback. And so I
 15 apologize if there are times where I'm speaking over
 16 you. I'll try to slow down a little bit.
 17 And I also should have told you before this
 18 deposition started that if you in your capacity as the
 19 speaking agent for the plaintiff does not -- if you do
 20 not know an answer, just say you do not know. That's
 21 perfectly acceptable. But we don't want guesses and
 22 whatnot. If you do know, that's great.
 23 If at any time you need a break for any
 24 reason, just say so, and we'll accommodate that. Okay?
 25 A. Okay.

Page 19

1 Q. I usually try to break every hour, especially
 2 in the mornings because people need to use restrooms,
 3 court reporter needs to rest her hands.
 4 And if at any time I ask a question that does
 5 not come through clearly because of either the
 6 connection or you don't understand where I'm going with
 7 it, just say so, and I'll rephrase it or tell you where
 8 I'm going. I'm pretty transparent. Okay?
 9 A. Okay.
 10 Q. Have you been deposed before in any capacity?
 11 A. Yes.
 12 Q. How many times?
 13 A. I think twice.
 14 Q. And the first time, when was that?
 15 A. Probably in the 1980s.
 16 Q. Did that have anything to do with political
 17 affiliations or anything like that?
 18 A. No.
 19 Q. Okay. When was the second time?
 20 A. Let's see. That was -- that was regarding an
 21 easement dispute between myself and a neighbor.
 22 Q. So this is your first deposition in the
 23 capacity as a member of the KCRCC?
 24 A. Yes.
 25 Q. Back to the Legal Defense Fund, the treasurer

Page 20

1 has access to those funds and can draw on that account;
 2 correct?
 3 A. Yes.
 4 Q. But to do so, does she have to get per- -- he
 5 or she have to get permission from the Executive
 6 Committee?
 7 A. Yes.
 8 Q. Okay. And --
 9 A. If -- yes.
 10 Q. Well, you were going to add something to
 11 help -- I think help me understand.
 12 A. Well, if the Executive Committee has
 13 authorized a payment or authorized an engagement and
 14 then a payment can come through, then the secretary is
 15 authorized to pay against those authorized funds. So
 16 not every check received separate authorization.
 17 Q. Does the Budget Committee work with the
 18 treasurer in her or his capacity as accessing -- strike
 19 that. Let me start over.
 20 What's the Budget Committee's relationship
 21 with the Legal Defense Fund, if you know?
 22 A. There isn't one.
 23 Q. Okay. What does the Budget Committee, what's
 24 its purpose?
 25 A. For budgeting the KCRCC.

Page 21

1 Q. And are the Budget Committee records available
2 for public review?
3 A. **The budget is in the hands of the treasurer.**
4 Q. Does the treasurer report the budget to the
5 Secretary of State?
6 A. **No.**
7 Q. Any funds or donations to the KCRCC for
8 electioneering are reported to the Secretary of State;
9 is that fair?
10 A. **Correct.**
11 Q. Is anything that is donated to the Legal
12 Defense Fund reported to the Secretary of State?
13 A. **No.**
14 Q. Why not?
15 **MR. FRANKLIN-MURDOCK:** Object to form.
16 **THE WITNESS:** It's not required.
17 Q. (BY MR. HAMAN) And who told you it's not
18 required?
19 A. **Secretary of State --**
20 **MR. FRANKLIN-MURDOCK:** Hold on. Doesn't sound
21 like this is one of those questions, but given the
22 nature of that question, I'm going to remind you that if
23 any of the answers to these questions is relating to a
24 communication either between our office or any other
25 legal counsel that the KCRCC has engaged, don't reveal

Page 22

1 the substance of those communications. The question was
2 fine, but I just want -- if that's the answer, then stay
3 away from it.
4 **THE WITNESS:** Okay.
5 Q. (BY MR. HAMAN) So back to the treasurer and
6 his or her responsibilities with regard to the Legal
7 Defense Fund. That individual reports donations and
8 expenditures from the Legal Defense Fund to the
9 Executive Committee; is that fair?
10 A. **I am -- no.**
11 Q. Does that person report expenditures to the
12 Executive Committee?
13 A. **For the Legal Fund?**
14 Q. From the Legal Fund, yes.
15 A. **As a separate report?**
16 Q. Or can be an oral report.
17 A. **No.**
18 Q. Okay. How do you know what's being spent,
19 then?
20 A. **The invoices come in and are paid.**
21 Q. Who sees the invoices?
22 A. **The treasurer and myself.**
23 Q. Okay. Anyone else?
24 A. **I'm not aware.**
25 Q. Who can draw on the Legal Defense Fund?

Page 23

1 A. **The treasurer and myself.**
2 Q. And anyone else?
3 A. **No.**
4 Q. Do you personally maintain records from the
5 Legal Defense Fund at your residence?
6 A. **No.**
7 Q. But you have access to the records?
8 A. **Yes.**
9 Q. Where are those records kept?
10 A. **Server.**
11 Q. Where's the server?
12 A. **It's at my work.**
13 Q. Where's your work?
14 A. **At 6956 East Borley Road.**
15 **THE COURT REPORTER:** Could you say the address
16 again.
17 **THE WITNESS:** 6956 East Borley Road.
18 **THE COURT REPORTER:** Borley?
19 **THE WITNESS:** B-o-r-l-e-y.
20 Q. (BY MR. HAMAN) Is that a business?
21 A. **Yes.**
22 Q. What's the name of the business?
23 A. **Regan Designs.**
24 Q. And the treasurer, does he or she also have a
25 server, if you know?

Page 24

1 A. **I don't.**
2 Q. Do either you or the treasurer give any type
3 of reporting to the Executive Committee with regard to
4 the status of the Legal Defense Fund? In other words,
5 this is how much we've got, here's what we've done with
6 it, here's what's coming in, just a general status of
7 the Legal Defense Fund?
8 A. **As a regular report?**
9 Q. Annual? Semiannual? Monthly?
10 A. **Not as a regular report.**
11 Q. How is it done, then?
12 A. **When anybody asks.**
13 Q. So anyone on the Executive Committee?
14 A. **Yes.**
15 Q. What about a precinct member?
16 A. **No.**
17 Q. Okay. So a person on the Executive Committee
18 can request a status or a report from either you or the
19 treasurer with regard to Legal Defense Fund, and you are
20 obligated to provide the information in response to that
21 request?
22 A. **Yes.**
23 Q. And is that mandated by the bylaws?
24 A. **No.**
25 Q. Is it prescribed somewhere, like it has to be

Page 25

1 done monthly or annually or anything like that?
 2 A. No.
 3 Q. And when you provide or the treasurer provides
 4 a report, is it done in writing, typically?
 5 A. Usually reports are oral.
 6 Q. And are there any minutes or records with
 7 regards to those conversations?
 8 A. I don't believe so.
 9 Q. I'm going to share -- activate the sharescreen
 10 and show you a document, and just maybe you can clarify
 11 a little bit of my, perhaps, confusion I might have.
 12 Okay. Can you see that clearly?
 13 A. Yes.
 14 Q. So on October 26th of '23 Rob McQuade, with
 15 the Secretary of State for Idaho, sends an email to
 16 Ms. Price, and I believe you said that that is referring
 17 to Elaine Price, the former --
 18 A. Mm-hmm.
 19 Q. -- treasurer?
 20 A. Yes.
 21 Q. Do you know if Ms. Price responded to this
 22 email?
 23 A. I do not.
 24 Q. The email asked, Our understanding is that
 25 these donations -- in other words, donations to the

Page 26

1 Legal Defense Fund -- will go to the committee and not a
 2 separate entity; is that accurate? And then goes on to
 3 say, We would like to discuss this further with you as
 4 we have a different understanding of what the law
 5 requires the committee to report.
 6 Do you know --
 7 MR. FRANKLIN-MURDOCK: For the record, there
 8 was an "if so" before the "we would like," just to have
 9 it on the record.
 10 MR. HAMAN: Yeah, I believe I said that, but
 11 whatever. I'm going to make this an exhibit, so it's
 12 going to be in the record.
 13 Q. (BY MR. HAMAN) Do you know if there was a
 14 meeting or conversation by anyone on the Executive
 15 Committee with the Secretary of State to discuss this
 16 issue further?
 17 A. Yes.
 18 Q. Tell me what you know.
 19 A. I had a conversation with a -- with
 20 Mr. McQuade.
 21 Q. When was that conversation?
 22 A. I don't recall the exact time.
 23 Q. Can you give me the month?
 24 A. It was within the last two months.
 25 Q. Tell me the nature of that conversation.

Page 27

1 A. He was wanting information about this matter.
 2 Q. About what matter?
 3 A. The Legal Defense Fund.
 4 Q. And what information did he want?
 5 A. I gave him the information of prior
 6 correspondence with his office -- actually, Sheryl
 7 Millard of the Secretary of State.
 8 Q. And what was the nature of that prior
 9 correspondence?
 10 A. We had asked -- I had inquired with
 11 Ms. Millard about the best way to set up a Legal Defense
 12 Fund, and she provided guidance for that, and our
 13 response is that we would follow their guidance.
 14 Q. What was that guidance, if you recall?
 15 A. That we should set up a separate bank account
 16 and that if that was done separately, then there were no
 17 reporting requirements as long as the funds were not
 18 used for electioneering.
 19 Q. Is your testimony, to the best of your
 20 knowledge, the funds contained in the Legal Defense Fund
 21 have not been used for electioneering in the last two
 22 years?
 23 A. Yes.
 24 Q. What bank does the Legal Defense Fund have its
 25 account with?

Page 28

1 A. Bank of Coeur d'Alene -- well, bankcda is the
 2 official name.
 3 Q. And has it been with bankcda for the last two
 4 years?
 5 A. Correct.
 6 Q. Any other banks that the Legal Defense Fund
 7 has an account with?
 8 A. No.
 9 Q. And then did you meet in person with
 10 Mr. McQuade approximately two months ago, or was it on
 11 the telephone?
 12 A. It was on the telephone.
 13 Q. And did Mr. McQuade, following that meeting,
 14 send you any emails or documents?
 15 A. No. Actually, I'm not sure if he responded to
 16 my email. I'd have to look.
 17 Q. What was the nature of your email?
 18 A. I sent him a copy of the correspondence I had
 19 with Ms. Millard.
 20 Q. And you don't know if he's responded to that?
 21 A. I would have to look. He may have said "thank
 22 you, this is helpful" or something along those lines.
 23 Q. So the best of your understanding, the
 24 Secretary of State's office was inquiring as to whether
 25 the Legal Defense Fund was expending money toward

Page 29

1 electioneering or not?
 2 **A. Say that again, please.**
 3 Q. To the best of your knowledge and
 4 understanding, the Secretary of State was inquiring as
 5 to whether or not funds from the Legal Defense Fund were
 6 being used for electioneering or otherwise, or not?
 7 **A. I don't know. I think it was more -- well,**
 8 **the letter that you have on the sharescreen right now**
 9 **says, "Our office sees no issue in the committee**
 10 **soliciting donations for the purpose, and it is our**
 11 **understanding these donations will go to the committee,**
 12 **not a separate entity; is that accurate?"**
 13 **And that statement is not accurate.**
 14 Q. Why isn't it accurate?
 15 **A. Because they don't go to the committee. It**
 16 **goes to a separate entity, Legal Defense Fund.**
 17 Q. Did you explain that to Mr. McQuade when you
 18 spoke with him on the phone?
 19 **A. Yes.**
 20 Q. And you explained to him that the funds are
 21 not used for electioneering?
 22 **A. Yes.**
 23 Q. Did he ask for any documents to -- from you to
 24 support your explanation?
 25 **A. Yes, the email exchange that I had with**

Page 30

1 **Ms. Millard.**
 2 Q. He did not ask to see the account and see what
 3 -- who has donated and what the amount of those
 4 donations?
 5 **A. No.**
 6 Q. He did not ask to see --
 7 **A. Excuse me. Let me get rid of this.**
 8 Q. You're fine.
 9 **A. Go ahead.**
 10 Q. He did not ask to see any paperwork regarding
 11 how the funds are being spent?
 12 **A. He did not make that request.**
 13 Q. This current lawsuit is being funded by the
 14 Legal Defense Fund; correct?
 15 **A. Correct.**
 16 Q. Did anyone make a specific donation to the
 17 Legal Defense Fund for purposes of this specific
 18 lawsuit?
 19 **A. I wouldn't know --**
 20 Q. Did you --
 21 **A. -- what their state of mind was.**
 22 **MR. FRANKLIN-MURDOCK:** I should have objected
 23 to the form of that question, so I'll do that now.
 24 Q. (BY MR. HAMAN) Did you make a specific
 25 donation to the Legal Defense Fund for this lawsuit?

Page 31

1 **A. Yes.**
 2 Q. How much?
 3 **A. I don't recall the exact amount.**
 4 Q. More or less than 1,000?
 5 **A. More.**
 6 Q. More or less than 5,000?
 7 **A. I'm not sure.**
 8 Q. Anyone else you know of?
 9 **A. Yes.**
 10 Q. Who?
 11 **MR. FRANKLIN-MURDOCK:** I object based on
 12 relevance, financial privacy of the people making the
 13 donations. This is far field of the claims and defenses
 14 in the lawsuit.
 15 **MR. HAMAN:** I think it's reasonably calculated
 16 to lead to discovery of admissible evidence, so I think
 17 you can answer.
 18 **THE WITNESS:** I'm not going to answer.
 19 **MR. FRANKLIN-MURDOCK:** What is the relevance?
 20 If you can just state that on the record.
 21 **MR. HAMAN:** Well, there have been claims
 22 against Dan Gookin that he made comments of a defamatory
 23 nature about the use of the Legal Defense Fund and
 24 referred to you have sued him because he has referred to
 25 it as a secret account. So let's unveil the onion here,

Page 32

1 let's peel it back.
 2 Q. (BY MR. HAMAN) Who else? You have to answer
 3 it.
 4 **MR. FRANKLIN-MURDOCK:** The tweet did not talk
 5 about the Legal Defense Fund. I think we're kind of
 6 mixing different discussions here. There's the tweet
 7 that talked about a defamatory allegation of secret bank
 8 accounts, and then there's this discussion of the Legal
 9 Defense Fund.
 10 **MR. HAMAN:** I think we all know that the
 11 secret account is the Legal Defense Fund. Let's not --
 12 let's not split hairs here. I mean, this ain't my first
 13 rodeo. I've been around. That's what we're talking
 14 about; that's what we all know he's talking about.
 15 **MR. FRANKLIN-MURDOCK:** I think we'll get to
 16 that on Thursday, but I don't --
 17 Q. (BY MR. HAMAN) Who else? You have to answer
 18 it.
 19 **MR. FRANKLIN-MURDOCK:** I'm going to renew my
 20 objection based on relevance. This is harassing of the
 21 witness because this is not related to the substance of
 22 the lawsuit, but is a fishing expedition to try to get
 23 at third parties who are not party to this lawsuit's
 24 financial information and private donations. So I think
 25 this is an inappropriate use of this deposition,

1 especially given that the offer of proof as to why this
2 is relevant was based on an unsubstantiated
3 interpretation of the defamatory tweet that is one of
4 the tweets identified in the complaint. So I would ask
5 you to ask another question.

6 **MR. HAMAN:** Well, I think my question still
7 pends, and I'm waiting for an answer. And I'm certainly
8 not harassing him. I'm not being argumentative. I'm
9 being very patient. I'm being very professional, and
10 I'm being very nice. I'm just asking him again who
11 else.

12 **THE WITNESS:** Donors.

13 Q. (BY MR. HAMAN) Can you give me the names of
14 those donors?

15 A. No.

16 **MR. FRANKLIN-MURDOCK:** Counsel, we don't have
17 a protective order in this case now. What if we keep
18 this -- if we agree to treat this transcript the way it
19 would be if it were maintained as confidential pending
20 the 30-day review period and thereafter until we can
21 execute a stipulated protective order and agree that
22 we're going to treat this deposition as if it were
23 subject to that and agree in good faith to, A, enter
24 into a stipulated protective order; and, B, designate
25 portions of this deposition, including the answer to

1 **MR. FRANKLIN-MURDOCK:** Okay. So I think since
2 that addresses -- I'll maintain my relevance objection,
3 but that does satisfy the privacy objection. So if you
4 want to go ahead and ask.

5 Q. (BY MR. HAMAN) You can go ahead and answer,
6 Mr. Regan.

7 **THE WITNESS:** Mr. Murdock, is that -- I don't
8 quite understand what's occurring.

9 **MR. FRANKLIN-MURDOCK:** So we agreed that the
10 answer to this question will be treated as confidential
11 and that we're going to enter into a stipulated
12 protective order so that is -- there will be a court
13 order that makes this answer confidential, and counsel
14 has agreed that this portion of the deposition will be
15 confidential in accordance with that order.

16 So I'm still objecting to it based on
17 relevance and harassing, but I'm satisfied that the
18 protective order that we will have will satisfy the
19 third party's privacy interests here. So you can
20 answer.

21 **THE WITNESS:** Well, I don't have --

22 **MR. FRANKLIN-MURDOCK:** Within your knowledge,
23 sitting here today.

24 **THE WITNESS:** I don't have a full list of
25 donors because the donor solicitation was done via the

1 this question, as confidential both before and after
2 that execution, I think some of my concerns would be
3 ameliorated. Is that something you're willing to do?

4 **MR. HAMAN:** Yeah, I'm fine with that with
5 regard to this line of questioning, sure. We can mark
6 this portion of the deposition, then I'll ask some of
7 the names of the donors, and then I'll move on.

8 **MR. FRANKLIN-MURDOCK:** Okay. And because
9 Mr. Gookin is in this deposition right now, perhaps, we
10 can go off the record, that way -- because I don't want
11 to be the one explaining to your client what that means
12 that we're going to treat this as confidential until we
13 get a stipulated protective order in place, and we can
14 make the proper designations.

15 **MR. HAMAN:** He is actually present. He's
16 observing. You can see his name on the --

17 **MR. FRANKLIN-MURDOCK:** No, no, that's what I
18 mean, that he is here.

19 **MR. HAMAN:** But Dan's -- Dan understands, he's
20 been around. But so just be -- we would mark this part
21 of the deposition as subject to a protective order and
22 that this portion of the deposition would not be
23 revealed to anyone outside this lawsuit, and that would
24 also entail that Dan cannot talk about it to anyone,
25 including his own family members.

1 website. So there's a number of donors. I don't have
2 that list at my fingertips.

3 Q. (BY MR. HAMAN) Can you give me the names the
4 best you can recall?

5 A. I do recall two, [REDACTED] and
6 [REDACTED].

7 Q. And what's [REDACTED]' first name, if you
8 know?

9 A. [REDACTED].

10 Q. And what's [REDACTED] first name?

11 A. [REDACTED].

12 Q. Did you solicit their donations?

13 **MR. FRANKLIN-MURDOCK:** Object to form.

14 **THE WITNESS:** [REDACTED], yes.

15 Q. (BY MR. HAMAN) Did you solicit [REDACTED]
16 deposition -- donation?

17 A. Well, define "solicit."

18 Q. Go out and ask them to donate to the Legal
19 Defense Fund in order to prosecute a claim against Dan
20 Gookin.

21 A. Is it a case -- well, is that me, personally,
22 asking them or general solicitation?

23 Q. You, personally.

24 A. No.

25 Q. Was there a general solicitation by KCRCC or

Page 37

1 its Executive Committee to that individual?
 2 **A. Yes. And that's outlined in the letter that**
 3 **you have on the sharescreen.**
 4 **MR. FRANKLIN-MURDOCK:** And just for the
 5 record, the questions and answers regarding [REDACTED] and
 6 [REDACTED] are going to designated as confidential --
 7 **MR. HAMAN:** Correct.
 8 **MR. FRANKLIN-MURDOCK:** -- up to and after the
 9 protective order is entered into.
 10 **MR. HAMAN:** Correct.
 11 **Q. (BY MR. HAMAN)** Why did you personally go to
 12 [REDACTED]?
 13 **A. He's a donor to the committee.**
 14 **Q. Why him and not someone else?**
 15 **A. He's a donor to the committee. We were having**
 16 **a conversation.**
 17 **Q. When did you have that conversation?**
 18 **A. I don't recall the exact date.**
 19 **Q. Was it before or after suit was filed?**
 20 **A. After.**
 21 **Q. And tell me what you talked about.**
 22 **A. A variety of things.**
 23 **Q. Okay. Can you break it down for me?**
 24 **A. It was a general -- I don't recall the details**
 25 **of the conversation, no.**

Page 38

1 **Q. Generally, what did you talk about?**
 2 **A. Family, friends, weather, status of the -- of**
 3 **the KCRCC, and at some point we discussed the lawsuit**
 4 **and that we're looking for donations for the Legal Fund.**
 5 **Q. And with regard to the lawsuit, tell me what**
 6 **you said and he said, to the best you recall.**
 7 **A. I told him what the details of the lawsuit**
 8 **was, why it was occurring, and if he'd be interested in**
 9 **making a donation to help out.**
 10 **Q. What did you say with regard to why it was**
 11 **occurring?**
 12 **A. I laid out the explanation that's in the**
 13 **complaint.**
 14 **Q. Did you tell him that the purpose of the**
 15 **lawsuit was to punish Mr. Gookin?**
 16 **MR. FRANKLIN-MURDOCK:** Object to form.
 17 **THE WITNESS:** Punish?
 18 **Q. (BY MR. HAMAN)** Yup.
 19 **A. I don't know if "punish" is the right word.**
 20 **Q. What word did you use?**
 21 **A. I don't recall exact words.**
 22 **Q. Did you use something to the effect that you**
 23 **wanted to deter his conduct, future conduct?**
 24 **A. Words to that effect.**
 25 **Q. Did you say anything to [REDACTED] with**

Page 39

1 regard to the effect that the alleged defamatory
 2 comments have had on the KCRCC?
 3 **A. I don't recall.**
 4 **Q. Did you talk with anyone in the Executive**
 5 **Committee in preparation for your deposition today?**
 6 **A. No.**
 7 **Q. Did you talk with [REDACTED] in preparation**
 8 **for your deposition today?**
 9 **A. No.**
 10 **Q. Have you talked with anyone outside of counsel**
 11 **in preparation for your deposition today?**
 12 **A. Only mentioned that I had a deposition today.**
 13 **Q. And who did you mention that to?**
 14 **A. My wife.**
 15 **Q. Anyone else?**
 16 **A. There were maybe two or three other committee**
 17 **members.**
 18 **Q. Members of the Executive Committee or**
 19 **different committees?**
 20 **A. Executive Committee.**
 21 **Q. Who are those members?**
 22 **A. Secretary and the youth committee person.**
 23 **Q. And who currently is the secretary?**
 24 **A. Beverly Guenette.**
 25 **THE COURT REPORTER:** Could you say that again

Page 40

1 for me.
 2 **THE WITNESS:** Beverly Guenette,
 3 G-u-e-n-e-t-t-e.
 4 **Q. (BY MR. HAMAN)** Did you approach her, or did
 5 she approach you?
 6 **A. Neither. We were having a conversation and**
 7 **the subject of what are you doing tomorrow came up, and**
 8 **I mentioned I have a deposition on the Gookin matter.**
 9 **Q. Who's the current youth person?**
 10 **A. Dan --**
 11 **THE COURT REPORTER:** I'm sorry, who?
 12 **THE WITNESS:** Dan Bell.
 13 **Q. (BY MR. HAMAN)** And did you approach Dan, or
 14 Dan approach you?
 15 **A. We were all together in a conversation.**
 16 **Q. Who made the decision to -- well, back up.**
 17 **Well, this is the first suit that's been**
 18 **brought by KCRCC. So who made the decision to bring**
 19 **this lawsuit?**
 20 **A. The Executive Committee, after consultation**
 21 **with counsel.**
 22 **Q. How did it come to the Executive Committee?**
 23 **Did you bring it to the Executive Committee?**
 24 **A. Yes.**
 25 **Q. And you went to the Executive Committee and**

Page 41

1 said that you would like to bring an action -- "you"
2 being the KCRCC -- against Mr. Gookin, and you explained
3 the reasons why; correct?
4 **MR. FRANKLIN-MURDOCK:** Just a reminder not to
5 share what legal counsel told you about this lawsuit
6 even if you relayed that to decision-makers of the
7 KCRCC.
8 **THE WITNESS:** Yes.
9 Q. (BY MR. HAMAN) And was that -- were there
10 minutes of that meeting?
11 A. No.
12 Q. Why not?
13 **MR. FRANKLIN-MURDOCK:** Object to form.
14 **THE WITNESS:** Because we don't take minutes.
15 Q. (BY MR. HAMAN) Was the meeting open? Was it
16 -- for example, was it on the agenda?
17 A. I believe -- and I'm going to have to -- I
18 would have to go back and refer to the minutes on this
19 -- but I believe the matter was brought before the
20 Central Committee.
21 Q. So the Central Committee, not -- first and
22 then the Executive Committee?
23 A. No. The Executive Committee first and then
24 the Central Committee.
25 Q. Okay. What -- and I didn't ask you -- what is

Page 42

1 the function of the Central Committee?
2 A. It is the general assembly of the precinct
3 committeemen.
4 Q. So it's everybody?
5 A. Yes.
6 Q. Okay. So the subject of bringing an action
7 against one of your members was brought before the
8 Central Committee, to the best of your recollection?
9 A. I believe so, yes.
10 Q. And then was there a vote taken?
11 A. Yes.
12 Q. And then I presume the vote was in favor of
13 bringing -- of taking the matter to the Executive
14 Committee?
15 A. Yes -- no. To proceed.
16 Q. To proceed?
17 A. The Central Committee is a superior body to
18 the Executive Committee.
19 Q. Okay. And so if it was brought before the
20 Central Committee, that would have been on the agenda?
21 A. Yes.
22 Q. And then there should be minutes of that?
23 A. There are.
24 Q. Okay. Do you know, was that in September?
25 August? October?

Page 43

1 A. Again, I need to go look. There's -- it would
2 have been prior to the suit being filed.
3 Q. Correct. Then was there a subsequent
4 discussion about bringing the suit between you and
5 members of the Executive Committee?
6 A. Not after the approval of the Central
7 Committee.
8 Q. Okay. Did you go to the Executive Committee
9 before it went to the Central Committee?
10 A. Yes.
11 Q. Okay. And was there a vote?
12 A. Yes.
13 Q. And do you know the outcome of that vote? Was
14 it unanimous?
15 A. Yes.
16 Q. Was it bifocal?
17 A. Unanimous.
18 Q. Okay. And that vote was to then go forward to
19 the Central Committee to get approval, and the Central
20 Committee approved and then suit was filed?
21 A. Correct.
22 Q. Were there minutes of the meeting with the
23 Executive Committee?
24 A. No.
25 Q. Why not?

Page 44

1 **MR. FRANKLIN-MURDOCK:** Objection. Asked and
2 answered.
3 **THE WITNESS:** Asked and answered, yeah. We
4 typically don't take minutes.
5 Q. (BY MR. HAMAN) Did you declare an executive
6 session when you met with the Executive Committee?
7 A. That's not a thing.
8 Q. Well, it is a thing, but I'm just asking if
9 you said it or not.
10 A. No.
11 Q. Do you know what executive session is?
12 A. Yes.
13 Q. Okay. Where are the minutes kept for the
14 Central Committee?
15 A. The secretary has them.
16 Q. And does he or she keep those at his or her
17 house or a place of business, if you know?
18 A. I don't know.
19 Q. If you want to see minutes, you call up this
20 person and ask for the minutes, and they'd bring them to
21 or send --
22 A. Presumably, yeah.
23 Q. When you brought the matter -- your concerns
24 about the alleged defamatory comments to the Central
25 Committee, did you request approval to go forward with

Page 45

1 the lawsuit on behalf of KCRCC or on behalf of yourself,
 2 personally?
 3 **A. KCRCC.**
 4 Q. Isn't this suit brought because of Dan's
 5 criticisms of you as opposed to KCRCC, though?
 6 **MR. FRANKLIN-MURDOCK:** Object to form.
 7 **THE WITNESS:** I couldn't say.
 8 Q. (BY MR. HAMAN) You took -- you took them
 9 personally, his comments personally; right?
 10 **MR. FRANKLIN-MURDOCK:** Which comments?
 11 Q. (BY MR. HAMAN) All of them. All of them that
 12 are outlined in the complaint. It's pretty clear. You
 13 took them personally, didn't you?
 14 **MR. FRANKLIN-MURDOCK:** Object to form.
 15 **THE WITNESS:** No.
 16 Q. (BY MR. HAMAN) You didn't?
 17 **A. No.**
 18 Q. So this is all about on behalf of the KCRCC
 19 because you feel the KCRCC was somehow defamed by his
 20 comments; right?
 21 **A. Yes.**
 22 **MR. FRANKLIN-MURDOCK:** Object to form.
 23 Q. (BY MR. HAMAN) Had nothing to do with you
 24 personally?
 25 **A. I'm sorry, I answered that question.**

Page 46

1 Q. I'm asking it again.
 2 **A. No.**
 3 Q. Do you know what a spite suit is?
 4 **A. No.**
 5 Q. Are you trying to silence Dan?
 6 **A. No.**
 7 Q. You agree he's been a vocal critic of you
 8 personally, hasn't he?
 9 **A. Yes.**
 10 Q. You don't like that, do you?
 11 **A. I have lots of critics.**
 12 Q. But you've only sued Dan?
 13 **A. I'm --**
 14 **THE COURT REPORTER:** I'm sorry, Mr. Regan,
 15 state your answer again.
 16 **THE WITNESS:** I'm not suing Dan.
 17 Q. (BY MR. HAMAN) KCRCC is only suing Dan and
 18 has only sued Dan and nobody else; correct?
 19 **A. Yes.**
 20 Q. Yet, others have criticized KCRCC before;
 21 correct?
 22 **A. Yes.**
 23 Q. And you brought this to the Central Committee,
 24 nobody else, you brought this request to bring a suit;
 25 correct?

Page 47

1 **A. Yes.**
 2 Q. We've talked about donations to the Legal
 3 Defense Fund. There are also donations to the KCRCC
 4 that are separate from the Legal Defense Fund; correct?
 5 **A. Correct.**
 6 Q. And those donations are reported to the
 7 Executive Committee; is that fair?
 8 **A. They're reported to the Secretary of State.**
 9 Q. Are they also reported to the secretary of the
 10 Executive Committee?
 11 **A. No.**
 12 Q. Are they reported to the treasurer?
 13 **A. Yes.**
 14 Q. Okay. Have donations increased since
 15 October 1st, 2023, to June 1st of this year?
 16 **A. Compared to what?**
 17 Q. Compared to October 1st, 2022 to October 1st,
 18 2023?
 19 **A. I don't have that analysis.**
 20 Q. Who would?
 21 **A. You'd have to go through the Secretary of**
 22 **State and do the analysis.**
 23 Q. Well, I've asked for this information, and the
 24 subject of this lawsuit is information in the complaint
 25 you have claimed -- "you" being the KCRCC -- that you

Page 48

1 have been damaged. So I'm now looking for the economic
 2 damages to the KCRCC. So my question is pretty fair.
 3 Have donations increased since the filing of this
 4 lawsuit?
 5 **A. And my answer is I haven't done the analysis**
 6 **on those time periods.**
 7 Q. Why didn't you do the analysis?
 8 **MR. FRANKLIN-MURDOCK:** Object to form.
 9 Q. (BY MR. HAMAN) I mean, you're claiming
 10 damages -- "you" being KCRCC -- I want to know what
 11 those damages are.
 12 **A. Well, we specified those in the complaint.**
 13 Q. No, you didn't.
 14 **MR. FRANKLIN-MURDOCK:** Object to form --
 15 (Inaudible, multiple speakers.)
 16 **THE COURT REPORTER:** Whoa, whoa, whoa. I'm
 17 sorry. What was the objection?
 18 **MR. FRANKLIN-MURDOCK:** The objection is that
 19 it's argumentative and it mischaracterizes the
 20 complaint.
 21 Q. (BY MR. HAMAN) What are your damages?
 22 **MR. FRANKLIN-MURDOCK:** And just for the
 23 record, "you" as in KCRCC?
 24 **MR. HAMAN:** Correct.
 25 **THE WITNESS:** Reputational.

Page 49

1 Q. (BY MR. HAMAN) Okay. That it?
 2 A. **You're asking me a legal question.**
 3 Q. No. I'm asking you on behalf of KCRCC, what
 4 are your damages? And I would ask you the same question
 5 at trial before the jury and a judge, and you would be
 6 required to ask it -- answer it. What are your damages?
 7 **MR. FRANKLIN-MURDOCK:** Object to form.
 8 You can answer.
 9 **THE WITNESS:** What's that?
 10 **MR. FRANKLIN-MURDOCK:** I objected to form, but
 11 you can answer.
 12 **THE WITNESS:** Okay. KCRCC banks on its
 13 reputation for the work that it does.
 14 Q. (BY MR. HAMAN) Okay. Outside of the
 15 potential impact to the reputation, any other damages?
 16 **MR. FRANKLIN-MURDOCK:** Object to form.
 17 **THE WITNESS:** I don't really understand your
 18 question, "outside of the" -- so does that mean within
 19 the scope of the damage that could be done to the
 20 reputation?
 21 Q. (BY MR. HAMAN) No.
 22 A. **Or outside of that?**
 23 Q. Aside from the alleged damage to the
 24 reputation of the KCRCC, do you -- does the KCRCC have
 25 other damages, such as hard core par damages, money?

Page 50

1 A. **Well, we did specify that in the complaint.**
 2 Q. You specified a cost that you expended --
 3 A. **Yes.**
 4 Q. -- not damage. That's something you chose to
 5 do; correct?
 6 **MR. FRANKLIN-MURDOCK:** Object to form.
 7 **THE WITNESS:** That was something we did in
 8 reaction.
 9 Q. (BY MR. HAMAN) You didn't even mention Dan
 10 Gookin's name in that flyer or that printer thing, did
 11 you?
 12 A. **I don't recall. I'd have to review it.**
 13 Q. You approved the content of it, didn't you?
 14 A. **Yes.**
 15 **MR. FRANKLIN-MURDOCK:** Just back up a second.
 16 By "you approved the content," do you mean Mr. Regan or
 17 do you mean the KCRCC?
 18 **MR. HAMAN:** His capacity as chairman of the
 19 KCRCC and who also spearheaded this lawsuit.
 20 Q. (BY MR. HAMAN) You approved the content of
 21 that flyer; correct?
 22 A. **It would have been the Campaign Committee.**
 23 Q. And you are chair -- you are on that Campaign
 24 Committee; correct?
 25 A. **Yes, I am.**

Page 51

1 **MR. FRANKLIN-MURDOCK:** And just really fast,
 2 I'm just going to lodge an objection to the spearheaded
 3 language. I don't think there's been any testimony
 4 about Mr. Regan spearheading anything.
 5 **MR. HAMAN:** Okay. Well, we can mince words
 6 all we want.
 7 Q. (BY MR. HAMAN) But you reviewed the flyer
 8 before it went out; correct?
 9 A. **The committee did, yes.**
 10 Q. And you did, too?
 11 A. **Yes.**
 12 Q. And you --
 13 A. **As a member of the committee.**
 14 Q. And I'll ask again now that we've been talking
 15 about it. Dan Gookin's name doesn't even appear in that
 16 flyer does it?
 17 A. **I'd have to look at the flyer. If you say it**
 18 **doesn't, then it's not there.**
 19 Q. So back to in the reputational context, have
 20 donations increased in the last year compared to the
 21 year prior?
 22 A. **You asked me if I had those numbers, and I**
 23 **don't.**
 24 Q. I don't want to know the numbers. I just want
 25 to know what you have been told as is your role in the

Page 52

1 KCRCC. You have a pulse of the KCRCC; you have a
 2 feeling as to how things are going. Have donations
 3 increased in the last year?
 4 A. **No.**
 5 Q. Have they decreased?
 6 A. **Yes.**
 7 Q. Okay. Has membership increased or decreased?
 8 A. **Membership in the KCRCC is -- it's fixed.**
 9 Q. Okay. That's right. It's precinct
 10 committeeperson.
 11 So your testimony is that donations have
 12 decreased since -- I'm going to be more specific -- have
 13 donations decreased since the filing of this lawsuit?
 14 And I'll give you a date so it helps you. So from
 15 October 1st to the present, have donations decreased
 16 versus anticipation of what donations were expected to
 17 be?
 18 **MR. FRANKLIN-MURDOCK:** Object to form.
 19 **THE WITNESS:** Yeah, I can only say that I
 20 believe so, but I haven't done the analysis. So I can't
 21 say, quantitatively, that is the case.
 22 Q. (BY MR. HAMAN) So if donations have
 23 increased, that would show that the reputation has not
 24 been affected; is that fair?
 25 **MR. FRANKLIN-MURDOCK:** Object to form.

Page 53

1 **THE WITNESS:** Not necessarily.
2 Q. (BY MR. HAMAN) Have donations to the Legal
3 Defense Fund increased in that same time period?
4 **A. Legal Defense Fund didn't exist before that**
5 **time period.**
6 Q. When was the Legal Defense Fund founded?
7 **A. I'd have to go back and look.**
8 Q. It was definitely founded by October 26th,
9 2023; right?
10 **A. Yes.**
11 Q. So was it founded in September?
12 **A. I would have to go back and look.**
13 Q. What would you look at?
14 **A. See when the bank account was opened.**
15 Q. This lawsuit was filed on October 13th, 2023.
16 So you believe that the Legal Defense Fund was started
17 up between the 13th of October and the 26th of October
18 or beforehand?
19 **A. The Legal Defense Fund was started before this**
20 **litigation. It was started in reaction to another**
21 **matter.**
22 Q. What other matter?
23 **A. Meyer McCrea suit.**
24 Q. Did the Meyer McCrea suit, was that something
25 that was brought against KCRCC?

Page 54

1 **A. Against three of its members.**
2 Q. Which members?
3 **A. Anita Dupzyk, Janice Camarena, and Marjorie**
4 **Desgrosseilliers.**
5 Q. What was the nature of that suit?
6 **A. Defamation.**
7 Q. When was that suit? Was it 2023? 2022?
8 **A. Again, I'll have to look. I don't have that**
9 **information at my fingertips.**
10 Q. Give me your best estimate.
11 **A. I prefer not to.**
12 Q. Why not?
13 **A. I don't want to be -- have information that is**
14 **not accurate.**
15 Q. I'm not asking for accurate, just a general --
16 general idea. Was it a month before this suit? A year
17 before this suit?
18 **A. It was before this suit.**
19 Q. How much -- how much -- how many months or
20 years?
21 **A. Well, if you want, I can check my records and**
22 **look.**
23 **MR. HAMAN:** Okay. How about -- we've been
24 going an hour -- how about we take a break, what, take
25 ten minutes, people stretch, use the restroom, he can

Page 55

1 look at his records.
2 **MR. FRANKLIN-MURDOCK:** Sure.
3 **MR. HAMAN:** Okay.
4 **THE WITNESS:** Okay.
5 (Off the record at 11:10 p.m., PST.)
6 (On the record at 11:31 p.m., PST.)
7 Q. (BY MR. HAMAN) So let's go back on the
8 record. And before we took a break, you were going to
9 look something up. Did you have an opportunity to do
10 that?
11 **A. Yes. The date that the Meyer McCrea lawsuit**
12 **was filed was May -- May 5th -- excuse me -- May 10th of**
13 **'23.**
14 Q. And I also was able to pull it up. So it's
15 Judith Meyer, Regina McCrea, Plaintiff, versus Janice
16 Camarena -- C-a-m-a-r-e-n-a -- Anita Dupzyk --
17 D-u-p-z-y-k -- Marjorie Desgross- -- I'm just going to
18 spell it.
19 **A. Desgrosseilliers, Dupzyk, and Camarena.**
20 Q. Okay. Thank you. And that is spelled D as in
21 dog, e-s-g-r-o-s-s-e-i-l-l-i-e-r-s. The other
22 defendants are the Kootenai Republican Central Committee
23 and Brent Regan.
24 What are the nature of the claims that lawsuit
25 against KCRCC?

Page 56

1 **A. It's spelled out in the complaint there.**
2 Q. I don't have it. Asking you.
3 **A. All right.**
4 Q. I'm just curious, what do they --
5 **A. They objected -- they objected to the**
6 **characterization of their knowledge of certain materials**
7 **in the library system.**
8 Q. And you're also named individually in that
9 lawsuit?
10 **A. Correct.**
11 Q. Okay. It's a defamation suit against KCRCC?
12 **A. Yes.**
13 Q. And do you know if this suit, which is pending
14 and has been pending since May 10th, 2023, has had an
15 effect on the reputation of the KCRCC?
16 **A. I don't know.**
17 Q. Has anyone come up and talked to you about
18 this? Do people on the street say, "Jesus Christ, you
19 know, you guys are being sued for defamation, and I just
20 don't know if I can really support the KCRCC anymore,"
21 anything like that?
22 **A. No.**
23 Q. You said donations have decreased in the last
24 year. Do you know if donations have decreased because
25 of this lawsuit by Meyer against KCRCC?

Page 57

1 **A. I would have no way of telling.**
 2 Q. Just like you would have no way of telling if
 3 the donations have decreased based on the comments by
 4 Dan Gookin; is that fair?
 5 **MR. FRANKLIN-MURDOCK:** Object to form.
 6 **THE WITNESS:** I wouldn't know if somebody said
 7 that they -- that that was the reason.
 8 Q. (BY MR. HAMAN) I know, but my question is you
 9 would have no way of knowing if donations have increased
 10 or decreased based on the conduct as alleged in the
 11 complaint against Dan Gookin; right?
 12 **MR. FRANKLIN-MURDOCK:** Same objection.
 13 **THE WITNESS:** I would have no way to quantify
 14 it.
 15 Q. (BY MR. HAMAN) Just like you have no way of
 16 quantifying whether the reputation of KCRCC has improved
 17 or has been diminished in the eyes of the community
 18 based on the allegations by Meyer McCrea against KCRCC;
 19 right?
 20 **A. Scientific quantification, can't do it.**
 21 Q. Or general, just you have no way of knowing if
 22 the repetition has improved or has been met with
 23 disapproval in the eyes of the community based on either
 24 of the lawsuits; right?
 25 **A. Can't read minds.**

Page 58

1 Q. So your answer is yes, I have no way of
 2 knowing?
 3 **A. I can't read minds.**
 4 Q. And your answer is yes; correct?
 5 **A. I said I can't read minds, so I have no way of**
 6 **telling.**
 7 Q. Okay. I don't want to mislead you. There --
 8 when I asked you at the very beginning of this
 9 deposition whether the KCRCC has been a plaintiff, has
 10 prosecuted a civil action before, there was one in
 11 November of 2020 against the Coeur d'Alene School
 12 District, but it was filed on November 3rd, 2020, and
 13 dismissed on November 13th. So it was only there for
 14 ten days and, I don't know, maybe you forgot about it.
 15 So do you know anything about that suit?
 16 **A. No.**
 17 Q. That was --
 18 **A. This was versus the -- what are the specifics?**
 19 Q. Jeff Tyler, Bob Brooke -- with an e,
 20 B-r-o-o-k-e -- and the Kootenai County Republican
 21 Central Committee versus the Coeur d'Alene School
 22 District filed on November 3rd.
 23 **A. Oh. Yes. Okay.**
 24 Q. What was that lawsuit about?
 25 **A. Access to the polling location.**

Page 59

1 Q. Okay. I just wanted to clarify the record.
 2 So -- so there was one prior, but it looked like that
 3 was filed and then dismissed basically a week later.
 4 **A. Hmm.**
 5 Q. Prior to bringing suit against Dan Gookin in
 6 this matter, did KCRCC or anyone on its behalf send a
 7 cease and desist letter to him, if you know?
 8 **A. I don't know.**
 9 Q. If someone were to have done that, they would
 10 have had to get your approval or at least the approval
 11 of the Executive Committee; is that fair?
 12 **A. If it was on behalf of the KCRCC, yes.**
 13 Q. Okay. And so then if someone on behalf of
 14 KCRCC sent a cease and desist letter, you more likely
 15 than not would know about it?
 16 **A. Yes.**
 17 Q. And as far as you know, that has not occurred
 18 or has not --
 19 **A. No.**
 20 Q. Did you ever contemplate sending a cease and
 21 desist letter before filing suit?
 22 **MR. FRANKLIN-MURDOCK:** And, again, when you
 23 say "you" can you --
 24 **MR. HAMAN:** You in the KCRCC or you in your
 25 official capacity.

Page 60

1 **THE WITNESS:** Well, this gets into the
 2 territory of attorney-client privilege.
 3 Q. (BY MR. HAMAN) Well, I'm not asking about
 4 your conversations with counsel. I'm just asking
 5 whether you just thought about sending, in your official
 6 capacity, a cease and desist letter to Dan Gookin?
 7 **A. Think about it, yes.**
 8 Q. Why didn't you?
 9 **MR. FRANKLIN-MURDOCK:** And then it sounds like
 10 you're already aware of this, but again, just don't
 11 reveal conversations with counsel.
 12 **THE WITNESS:** All right. Then we didn't.
 13 Q. (BY MR. HAMAN) What?
 14 **A. Well, I'm a little stuck here. I'm not**
 15 **supposed to reveal conversations with counsel, and**
 16 **you're asking me about conversations with counsel.**
 17 Q. No, I'm not. But I'll ask you now: Were you
 18 advised by counsel not to send one?
 19 **MR. FRANKLIN-MURDOCK:** Don't answer that.
 20 You're asking him to reveal legal advice that
 21 our office has provided. That's clearly privileged.
 22 Q. (BY MR. HAMAN) Outside of advice by counsel,
 23 did you -- did you choose not to send one on your own
 24 accord?
 25 **A. You're still asking me about advice from**

Page 61

1 counsel.

2 Q. No, I'm not.

3 A. Yes, you are.

4 Q. Answer the question.

5 MR. FRANKLIN-MURDOCK: I think he's explained

6 the scope of this answer is within his communications

7 with counsel.

8 Q. (BY MR. HAMAN) Okay. Did you, or anyone, in

9 your official capacity, or anyone on behalf of KCRCC,

10 request a redaction or retraction by Mr. Gookin?

11 A. No.

12 Q. Why not?

13 A. Same answer as before.

14 Q. Which is?

15 MR. FRANKLIN-MURDOCK: Same instruction to the

16 witness answer not to reveal privileged communications.

17 THE WITNESS: There you go.

18 Q. (BY MR. HAMAN) Did you ask Mr. Gookin to pay

19 for the printing of the mailer that we were talking

20 about earlier?

21 A. No.

22 Q. Why not?

23 MR. FRANKLIN-MURDOCK: Same instruction. I'll

24 give a more precise instruction just for the record. If

25 the answer to this question is based on communications

Page 62

1 with counsel, don't describe those communications. But

2 if there is a non-privileged answer to that, you can

3 give that.

4 THE WITNESS: Okay. Ask the question again,

5 please.

6 Q. (BY MR. HAMAN) Why didn't you ask -- "you" in

7 your official capacity -- or anyone associated with

8 KCRCC ask for Dan to pay for the cost of the mailer?

9 A. I don't know that that came up.

10 Q. Who paid for the mailer?

11 A. KCRCC.

12 Q. From the Legal Defense Fund or from --

13 A. No.

14 Q. -- a different --

15 A. It was electioneering that came out of the

16 KCRCC general fund.

17 MR. FRANKLIN-MURDOCK: And just so we have a

18 clean record, even if you know where he's going with the

19 question, just let him ask the whole question and then

20 do the answer so we don't have a choppy transcript.

21 THE WITNESS: Okay.

22 Q. (BY MR. HAMAN) Who drafted the content of

23 that mailer?

24 A. The Elections Committee.

25 Q. Who's on the Elections Committee?

Page 63

1 A. That would have been at the time -- or excuse

2 me, not the Elections Committee -- the Campaign

3 Committee. At the time, I don't recall the complete

4 membership list for that period of time. It changes, so

5 I can't give you a concise list.

6 Q. You were on it?

7 A. Yes.

8 Q. How many people are on -- were on the Campaign

9 -- or was it the Campaign or Elections? I'm sorry.

10 A. Campaign Committee.

11 Q. How many people were on it in the fall of

12 2023?

13 A. Normally, there's six to ten people on it.

14 Q. So regardless of who prepared it, you, in your

15 official capacity, reviewed it? I think we talked about

16 that.

17 A. As a member of that committee, I reviewed it.

18 Q. And it was, in fact, printed and then

19 distributed?

20 A. Correct.

21 Q. Has the -- if you know, has the KCRCC ever in

22 any instance sent a cease and desist letter to anyone at

23 least since 2014 since you've been there?

24 A. I am trying to recall if we did in the matter,

25 if we did at all.

Page 64

1 Q. Okay. And in what matter?

2 A. I'm not -- I -- I don't recall specifically if

3 it ever happened.

4 Q. Okay. In your official capacity, do you think

5 it's fiscally responsible to sue one of your own members

6 for defamation?

7 A. Define "fiscally responsible."

8 Q. Well, you're spending a lot of money in this

9 lawsuit. Do you think it's fiscally responsible?

10 MR. FRANKLIN-MURDOCK: Object to form.

11 Q. (BY MR. HAMAN) And you're going to spend a

12 lot more, too, a lot.

13 THE COURT REPORTER: I'm sorry, what was the

14 answer?

15 Q. (BY MR. HAMAN) "No."

16 A. I'm sorry, you said what now?

17 Q. She just asked what the answer was.

18 A. And you said?

19 Q. Well, let's go back. What was your answer?

20 A. Do I think it's fiscally responsible?

21 Q. Correct.

22 A. I don't think it's a fiscal issue.

23 Q. Doesn't matter what you think if it's a fiscal

24 issue. Do you think it's fiscally responsible?

25 A. You're asking me for my opinion, and I don't

Page 65

1 think it's a fiscal issue.
 2 Q. I'm asking you as behalf -- as the chairman of
 3 the KCRCC if it's fiscally responsible to sue a member
 4 for defamation.
 5 A. If it's appropriate, yes.
 6 Q. Do you think this is appropriate?
 7 A. Yes.
 8 Q. Why?
 9 A. That's why we're doing it.
 10 Q. I'm asking you why it's appropriate. Why do
 11 you think it's appropriate?
 12 A. Because Mr. Gookin made specific allegations
 13 of criminal activity against the Central Committee.
 14 Q. Against the Central Committee or you in your
 15 personal capacity?
 16 A. Well, both.
 17 Q. And that's why you wanted this lawsuit; right?
 18 MR. FRANKLIN-MURDOCK: Object to form.
 19 Q. (BY MR. HAMAN) And you're using the KCRCC to
 20 fund your personal criticisms and distain for
 21 Mr. Gookin; right?
 22 MR. FRANKLIN-MURDOCK: Object to form.
 23 THE WITNESS: No.
 24 MR. FRANKLIN-MURDOCK: He's already dispelled
 25 this theory.

Page 66

1 Q. (BY MR. HAMAN) Let's talk about that. You --
 2 I think we talked earlier you, as chairman in your
 3 official capacity, you do believe that a member has a
 4 right to express their opinions and even criticize you
 5 or the Executive Committee; correct?
 6 A. Yes.
 7 Q. But you believe there are limits to that
 8 criticism?
 9 A. Yes.
 10 Q. And one of those limits, as you expressed
 11 earlier, is accusing members or the KCRCC itself of
 12 committing a crime, that's one of those limits; right?
 13 A. Yes.
 14 Q. And I'm going to hit the sharescreen again.
 15 The only reason why is because sometimes I'm going to
 16 use the words "crossed the line," and the reason why I'm
 17 doing that -- let's see here, bear with me for one
 18 moment. Blow this up.
 19 In the press release with regard to this
 20 lawsuit that we're here today to discuss, the second
 21 paragraph, second line, the words "crossed the line" are
 22 used. So allegations of criminal activity are, in the
 23 opinion of the KCRCC, crossing the line; correct?
 24 A. Yes.
 25 Q. Who drafted this press release, if you know?

Page 67

1 I'll scroll down slowly just so you can -- and I think
 2 the rest of it -- the second one is just the same as the
 3 first, it's a one-page document.
 4 A. Yes, I believe that was the Outreach
 5 Committee.
 6 Q. Who is -- are you a member of the Outreach
 7 Committee?
 8 A. I'm a member of all committees.
 9 Q. Are you the chair of the Outreach Committee?
 10 A. No.
 11 Q. Are you the chair of the Rating and Vetting
 12 Committee?
 13 A. No.
 14 Q. Are you the chair of any committees other than
 15 the Executive Committee?
 16 A. Well, the Central Committee, and by extension
 17 the Central -- the Executive Committee. But I'm not the
 18 chair of any other committee. Oh, Budget Committee.
 19 But that's defined in the bylaws.
 20 Q. And is it the opinion of the KCRCC that Dan's
 21 the only member who has crossed the line?
 22 A. Can't answer that.
 23 Q. If someone else crosses the line, you're going
 24 to sue them?
 25 A. One would assume so.

Page 68

1 Q. Do you know an individual named Russell Mann,
 2 M-a-n-n?
 3 A. Yes, know of him.
 4 Q. How do you know him?
 5 A. He ran for a precinct committeeman seat three
 6 times.
 7 Q. And are you aware that he promulgated and
 8 published comments calling you, in your capacity as
 9 chairman, a liar and called you corrupt and that you
 10 have endorsed white nationalists?
 11 A. Yes.
 12 Q. Did you send him a cease and desist letter?
 13 A. No.
 14 Q. Did you ask him to retract or redact his
 15 comments?
 16 A. No.
 17 Q. Did you sue him?
 18 A. No.
 19 Q. So comments regarding you, in your official
 20 capacity, or the Executive Committee or the KCRCC
 21 regarding being liars or corrupt or having endorsed
 22 white supremacists or white nationalists are not
 23 crossing the line?
 24 MR. FRANKLIN-MURDOCK: Object to form.
 25 THE WITNESS: None of those are crimes.

Page 69

1 Q. (BY MR. HAMAN) Okay. So what we're focused
 2 here on is the allegation that Dan accused you, in your
 3 official capacity, and/or the KCRCC as engaged in
 4 criminal activity?
 5 A. Yes.
 6 Q. That's it?
 7 A. Yes.
 8 Q. Okay. Okay. That's going to shorten this
 9 deposition quite a bit.
 10 MR. FRANKLIN-MURDOCK: I'll just note that the
 11 claims in the complaint speak for themselves.
 12 Q. (BY MR. HAMAN) Well, you have alleged several
 13 different defamatory comments, but we've narrowed it
 14 down to only one now, the criminal activity comment that
 15 is crossing the line. Is that why we're here,
 16 Mr. Regan?
 17 A. What's that?
 18 Q. That's why we're here today is because of the
 19 comments by Dan Gookin regarding whether or not the --
 20 or accusing the KCRCC and its member or members of being
 21 engaged in criminal activity?
 22 A. Yes, that's in the complaint.
 23 Q. Are there any other comments he's made that
 24 you feel crossed the line to an extent that they rise to
 25 the level of defamation and are subject to this lawsuit?

Page 70

1 MR. FRANKLIN-MURDOCK: Object to form.
 2 THE WITNESS: I'm not -- I'm not an attorney.
 3 Q. (BY MR. HAMAN) You're -- you signed the
 4 complaint.
 5 MR. FRANKLIN-MURDOCK: I mean, not really.
 6 Q. (BY MR. HAMAN) Well, okay. If he hasn't,
 7 then I'm asking him to, right now, because that's the
 8 law in Idaho to verify your complaint. And if an
 9 attorney signs it, he's acting on behalf of the client;
 10 so, therefore, he signed it.
 11 So we've talked a bit about what's crossing
 12 the line, and you've said allegations of criminal
 13 activity are crossing the line. You also said
 14 allegations of calling members of the KCRCC a liar or
 15 corrupt or endorsing white nationalists or white
 16 supremacists does not cross the line; right? You said
 17 that; right?
 18 A. Yes.
 19 Q. Okay.
 20 A. One's criminal activity and the other isn't.
 21 Q. Right. So we're here today, this lawsuit is
 22 about claims that Dan Gookin accused the members or
 23 member of KCRCC of engaged in -- being engaged in
 24 criminal activities; correct?
 25 MR. FRANKLIN-MURDOCK: Object to form.

Page 71

1 THE WITNESS: Yes, that's what's in the
 2 complaint.
 3 Q. (BY MR. HAMAN) And that's the reason why
 4 you're suing him for defamation? That's the only
 5 reason; right?
 6 A. That's what's outlined in the complaint.
 7 Q. And other comments he's made about calling you
 8 or members -- I'm sorry -- of being liars or corrupt or
 9 endorsing white supremacists are not crossing the line
 10 or subject to damages; correct?
 11 A. Well, now you're talking about damages.
 12 Q. Well, I guess I'm trying to identify what --
 13 you're telling me that comments about being a liar or
 14 corrupt or endorsing white supremacists does not cross
 15 the line and give rise to a defamation suit, but
 16 comments regarding being engaged in criminal activity
 17 does cross the line and is the subject of a defamation
 18 suit.
 19 So I'm just trying to narrow it down. Is the
 20 reason why we're here solely because of the comments Dan
 21 made or allegedly made about being engaged in criminal
 22 activity?
 23 MR. FRANKLIN-MURDOCK: Object to form.
 24 THE WITNESS: Is -- the reason we're here is
 25 outlined in the complaint.

Page 72

1 Q. (BY MR. HAMAN) And I'm trying to narrow it
 2 down.
 3 A. It's in the complaint.
 4 Q. Okay. That can't be your answer to every
 5 question. I'm narrowing it down --
 6 A. No, it can if that's what you're asking.
 7 Q. Then I'll be more happy to get the judge on
 8 and force you to answer this question.
 9 Are we here solely because of comments Dan,
 10 allegedly, made about criminal conduct of members or a
 11 member of the KCRCC?
 12 MR. FRANKLIN-MURDOCK: Object to form.
 13 THE WITNESS: Criminal content is crossing the
 14 line, yes.
 15 Q. (BY MR. HAMAN) Is that the only reason why
 16 this suit's filed?
 17 A. Yes.
 18 Q. Thank you.
 19 And so you're aware of -- I just want to make
 20 sure we're on the same page -- you're aware of an
 21 individual named Christa -- C-h-r-i-s-t-a -- Hazel --
 22 H-a-z-e-l -- right?
 23 A. Yes.
 24 Q. How do you know her?
 25 A. She ran for the Coeur d'Alene School District

Page 73

1 seat, in my opposition.
 2 Q. Okay. And you're aware that she published
 3 statements and posted on social media to the effect that
 4 the KCRCC was pedaling falsehoods; right?
 5 A. You'd have to show me her specific statements.
 6 I don't follow her closely.
 7 Q. Going to scroll down slowly. And so she
 8 alleges that KCRCC -- or she posts that KCRCC paid money
 9 to a person named Bushnell, who knowingly pedaled
 10 falsehoods. So she's implicating KCRCC and paying her
 11 to do this.
 12 MR. FRANKLIN-MURDOCK: Object to form.
 13 THE WITNESS: No, that's not what that says.
 14 Q. (BY MR. HAMAN) Okay. Have you seen this
 15 before today?
 16 A. I don't recall it specifically.
 17 Q. Anyone -- any member of the KCRCC recommend
 18 filing suit against Christa Hazel?
 19 A. That question has come up.
 20 Q. You certainly know Mary Souza?
 21 A. Yes.
 22 Q. Here Mary Souza is accusing supporters of the
 23 KCRCC of being liars. Does that cross the line?
 24 A. No. It's not a crime.
 25 Q. Okay. So --

Page 74

1 MR. FRANKLIN-MURDOCK: Just for the record, an
 2 apologist isn't necessarily a member of something. One
 3 can be -- an apologist --
 4 MR. HAMAN: I said "supporters."
 5 Q. (BY MR. HAMAN) So Dan's comments about KCRCC
 6 supporting or endorsing a white supremacist or a white
 7 nationalist are not the basis of this defamation suit --
 8 I just want to make sure we're clear -- is that fair?
 9 A. Asked and answered, yes.
 10 Q. Okay. Just going to skip all the David Reilly
 11 stuff.
 12 KCRCC did support and endorse David Reilly at
 13 one time; correct?
 14 A. Yes.
 15 Q. Do you continue to support him?
 16 A. No.
 17 Q. I was curious -- because I don't really follow
 18 school district elections where I live -- did Reilly win
 19 his seat for Post Falls School District?
 20 A. No.
 21 Q. Has he sought to run any other office in North
 22 Idaho, if you know?
 23 A. I don't believe so. But I don't have intimate
 24 knowledge of his activities.
 25 Q. I want to turn to the complaint, and like I

Page 75

1 said, this is going to -- I think maybe now would be --
 2 I know we took a break about 30, 35 minutes ago, but
 3 maybe we need to take a break. I need to talk to your
 4 attorney. Certainly, you can be present for it.
 5 So can we go off the record for a moment?
 6 MR. FRANKLIN-MURDOCK: Sure.
 7 THE COURT REPORTER: Okay.
 8 (Off the record at 12:01 p.m., PST.)
 9 (On the record at 12:05 p.m., PST.)
 10 Q. (BY MR. HAMAN) So I'm looking at paragraph 11
 11 of the complaint. And so you take issue with the
 12 underlying portion on paragraph 11; correct?
 13 A. Yes.
 14 Q. And you find that that is accusing you in your
 15 official capacity as engaging in criminal activity?
 16 MR. FRANKLIN-MURDOCK: Object to form. It
 17 says "they"; it doesn't say "he."
 18 THE WITNESS: Yeah. "They'll stick them on
 19 the endorsement card anyway. Rules don't mean
 20 anything."
 21 Q. (BY MR. HAMAN) Okay. And you believe that
 22 that is an allegation of criminal misconduct?
 23 A. Well, it's misconduct if we're breaking the
 24 rules.
 25 Q. Is it criminal?

Page 76

1 A. No.
 2 Q. Let me ask you. I'm just curious about the
 3 rating and vetting. That's a committee; correct?
 4 A. It's a series of committees.
 5 Q. Okay. Well, that -- you lost me there. So
 6 there are subcommittees within the Rating and Vetting
 7 Committee?
 8 A. Well, there is a Rating and Vetting Committee,
 9 as defined in the bylaw, but it is part of the process.
 10 Q. What is the process to select people or to
 11 endorse or support individuals you feel best serve the
 12 goals of the KCRCC and the community?
 13 A. The -- the outline answer is that first they
 14 go to -- firstly, Recruitment Committee finds potential
 15 candidates. Those then are interviewed and reviewed by
 16 the vetting -- Rating and Vetting Committee, who vets
 17 them. There is then a series of other steps where
 18 candidates are introduced to the committee and events
 19 and so forth. And then, finally, the rating itself is
 20 done by the complete -- by the full Central Committee at
 21 a special meeting.
 22 Q. Okay.
 23 A. In executive session.
 24 Q. Okay. So the rating's by the whole committee,
 25 the Central Committee, in special session or executive

Page 77

1 session?

2 **A. The executive session in a special meeting.**

3 Q. Okay. And then after that, then it goes to

4 the Central Committee for a vote on whether or not this

5 individual should be endorsed?

6 **A. No. That is the last step, the entire Central**

7 **Committee votes.**

8 Q. Does the Executive Committee get involved in

9 this?

10 **A. Well, the Executive Committee is part of --**

11 **the members of the Executive Committee are part of the**

12 **Central Committee, but the Executive Committee doesn't**

13 **have a separate step.**

14 Q. Okay. So just -- so in summary, Recruitment

15 Committee, and then there's interviews by the Rating and

16 Vetting Committee, and then there is -- if the person

17 makes it through the interview process and is supported

18 or people say, hey, go forward with being -- getting our

19 support, then it goes to the rating and vetting process

20 with the Central Committee, which is in executive

21 session?

22 **A. Correct.**

23 Q. Is the interview process also -- is that open

24 or is it private?

25 **A. That's private.**

Page 78

1 Q. And who does --

2 **A. The -- the Vetting Committee meeting is**

3 **private.**

4 Q. Okay. So it's not rating and vetting, it's --

5 **A. Well, it is rating and vetting, but that**

6 **meeting is the vetting meeting. The committee is called**

7 **Rating and Vetting and -- but what they do is vetting.**

8 Q. Okay. And in the fall of 2023, who conducted

9 the interviews?

10 **A. That would have been the Vetting Committee.**

11 Q. Who was on it?

12 **A. Jeff Tyler was the chairman.**

13 Q. And how many people are on that?

14 **A. Roughly a dozen.**

15 Q. Were you on it?

16 **A. Yes.**

17 Q. Give me the names of others.

18 **A. I don't have the full list.**

19 Q. Well, you know people. I mean, give me the

20 names.

21 **A. The vice chairman is Terri Seymour and Tamara**

22 **Bateson and Melanie Vander Feer, Barbara Hedden, Dan**

23 **Darfall [phonetic]. Let's see. At that time -- I'm not**

24 **sure who the other members were at that time.**

25 Q. Okay. So these individuals that you've

Page 79

1 identified conduct interviews?

2 **A. Yes, they interview the candidates.**

3 Q. Do you interview them, like, individually?

4 Like, I'm being recruited, and I want to go through the

5 process, do you interview me separately, and then maybe

6 Ms. Seymour will interview me separately and then Brent

7 might -- or that -- not Brent, I'm sorry -- then Barbara

8 might interview me separately? Or is it in conjunction

9 with everybody at one time?

10 **A. Everybody at one time.**

11 Q. So I'd be sitting, like, at a table and you

12 guys would ask me questions, and I would answer, and I

13 might ask questions of you guys, and you would answer?

14 **A. Correct.**

15 Q. Okay. And there's no minutes or records kept

16 of those interviews; is that fair?

17 **A. Correct, there's a -- yeah.**

18 Q. Is Tim Remington part of the Rating and

19 Vetting Committee?

20 **A. Yes, he has been.**

21 Q. Is he also a member?

22 **A. Of?**

23 Q. Of the KCRCC.

24 **A. No.**

25 Q. So you can bring in people who are not members

Page 80

1 to help with the interview process?

2 **A. Yes.**

3 Q. Was there an occasion -- I think -- I believe

4 it's 2023 -- where votes to endorse were tallied before

5 the Central Committee, but since the meeting went late,

6 you took the ballots home with you? That never

7 occurred?

8 **A. No.**

9 Q. 2022 or 2023, you never took the ballots home?

10 **A. Well, before they were tallied?**

11 Q. Before they were made official.

12 **A. No.**

13 Q. In 2023, were the votes counted the following

14 day, the day after the Central Committee meeting?

15 **A. No.**

16 Q. They were counted by you, Nina Beesley, and

17 Barb Hedden?

18 **A. No.**

19 Q. Who counts the votes?

20 **A. The people designated -- the people who are**

21 **nominated and then approved by the committee to tally**

22 **the votes.**

23 Q. And in 2023, would that be -- include you?

24 **A. No. I -- I never partake in the vote tally.**

25 Q. Did Nina Beesley or Barb Hedden partake in it?

Page 81

1 A. They may have at some point.
 2 Q. And are those done -- does anyone oversee
 3 them?
 4 A. Yes.
 5 Q. Who?
 6 A. Anybody who wants to that's on the committee.
 7 It's done immediately after the votes are cast.
 8 Q. And there wasn't an occasion where the meeting
 9 went late?
 10 A. Well, the meeting always goes late.
 11 Q. The votes were not --
 12 A. Define "late." It goes until it's done, and
 13 then we tally the votes, and then the votes are
 14 announced, and then we adjourn.
 15 Q. Was there an occasion where the votes were
 16 tallied before the Central Committee and then the
 17 ballots were taken home and then the official ballot
 18 came out the next day with a different vote count?
 19 A. No.
 20 I got to mute for just a moment here, excuse
 21 me.
 22 Q. You're fine.
 23 (Deponent muted Zoom.)
 24 THE WITNESS: Sorry about that. My -- there a
 25 was freight delivery to my mom's house. It's a new

Page 82

1 boiler for her house, so -- and they were lost, anyhow.
 2 MR. HAMAN: Do you need to go there for some
 3 reason?
 4 THE WITNESS: She's in California. So I'm
 5 managing this remotely.
 6 MR. HAMAN: I don't think we'll be too -- I
 7 mean, we'll take a break in a little bit, but I don't
 8 think we'll be too terribly long.
 9 Q. (BY MR. HAMAN) Do you know an individual
 10 named Ron Hartman?
 11 A. Yes.
 12 Q. And in 2022 he was running for the Worley
 13 Highway District?
 14 A. I believe so, yes.
 15 Q. And in 2022, didn't the rating and vetting
 16 card omit him but then was later endorsed by the KCRCC?
 17 A. Yes.
 18 Q. So paragraph 13 of the complaint you allege
 19 that on 9/15/23 Gookin posted that, "My rated and vetted
 20 criminal opponent just loaned his campaign 5,000. Where
 21 do you think that money came from," question mark. And
 22 it goes, "Money saved up" for the underlying power
 23 portion, "dark money provided by Brent from the secret
 24 KCRCC account they don't tell anybody about," hashtag,
 25 "laundering."

Page 83

1 Do you find that this comment is accusing you
 2 in your official capacity or the KCRCC of criminal
 3 activity?
 4 A. Yes. Dinesh D'Souza went to prison for that.
 5 Q. Say that again.
 6 A. Dinesh D'Souza went for prison -- went to
 7 prison for that very thing.
 8 Q. I don't think that that person asked it in the
 9 form of a question, though. These are in the form of a
 10 question; right? You can take a look at it. He's
 11 asking a question, isn't he?
 12 MR. FRANKLIN-MURDOCK: Object to form.
 13 THE WITNESS: No. He's -- at the end he's
 14 saying "laundering"; he's making a statement.
 15 Q. (BY MR. HAMAN) Well, the beginning, "Where do
 16 you think that money came from," and then he asks,
 17 "money saved up" or "dark money provided," hashtag,
 18 "laundering."
 19 You don't believe that's a form of a question?
 20 A. No.
 21 Q. Okay. But you believe that this is accusing
 22 KCRCC and/or you in your official capacity as engaging
 23 in criminal conduct?
 24 A. Yes.
 25 Q. You don't believe this to be an opinion or

Page 84

1 hyperbole?
 2 A. No.
 3 Q. Can you demonstrate that the statement is
 4 without factual support?
 5 A. You're asking to prove a negative?
 6 Q. It's your burden at trial. You will be asked
 7 to demonstrate that this is, without factual support,
 8 under the laws of defamation in the State of Idaho.
 9 A. So ask your question again, please.
 10 Q. Can you demonstrate that these statements are
 11 without reasonable factual support?
 12 MR. FRANKLIN-MURDOCK: Are you asking him to
 13 do that now, or are you just asking if he could do that?
 14 MR. HAMAN: Can he do it.
 15 THE WITNESS: Yes.
 16 Q. (BY MR. HAMAN) Okay. And what documents, if
 17 any, would you turn to to support your burden that these
 18 are without reasonable factual support?
 19 A. Bank records.
 20 Q. Including bank records associated with the
 21 Legal Defense Fund?
 22 A. Yes.
 23 Q. Okay. I don't believe you provided all the
 24 bank records for the Legal Defense Fund showing
 25 donations or expenditures; is that correct?

Page 85

1 A. The -- which funds? I'm sorry.
 2 Q. The legal -- the account for the Legal Defense
 3 Fund showing donations, names of donors, and
 4 expenditures from the Legal Defense Fund.
 5 A. I don't believe that was asked for.
 6 Q. Yeah, it was. And you don't --
 7 MR. FRANKLIN-MURDOCK: I just note that that
 8 information doesn't have any bearing on the truth or
 9 falsity of the statement in paragraph 13.
 10 MR. HAMAN: He just testified that he would
 11 rely on the Legal Defense Fund expenditures to support.
 12 MR. FRANKLIN-MURDOCK: Then you started
 13 talking about donations, and I know that that's
 14 something I know you and your client are very interested
 15 in. That's not -- where that money originated had no
 16 bearing on --
 17 Q. (BY MR. HAMAN) I'll narrow it down to
 18 expenditures from the Legal Defense Fund and to who the
 19 expenditures were given.
 20 A. Well, there are no expenditures for \$5,000.
 21 Q. You didn't provide me with expenditures from
 22 the Legal Defense Fund, did you?
 23 A. Well, there are none.
 24 Q. So the money just sits there in perpetuity?
 25 A. No. There are no expenditures for the \$5,000.

Page 86

1 Q. I didn't ask that. I'm asking you didn't
 2 provide me with any records showing expenditures from
 3 the Legal Defense Fund; correct?
 4 A. Correct.
 5 Q. So I can't prove or disprove the statement
 6 without those, can I?
 7 MR. FRANKLIN-MURDOCK: Object to form.
 8 Q. (BY MR. HAMAN) And you're going to rely on
 9 it, but I'm not allowed to rely on it; right?
 10 MR. FRANKLIN-MURDOCK: Object to form.
 11 Q. (BY MR. HAMAN) Are you going to turn over
 12 that information to me?
 13 MR. FRANKLIN-MURDOCK: It's not --
 14 THE WITNESS: Which information --
 15 MR. FRANKLIN-MURDOCK: This comes up in
 16 depositions sometimes. I'm going to say the same thing
 17 I always say, which is if there's documents you want,
 18 either send the request for production, send a
 19 meet-and-confer, we'll deal with it in that course. But
 20 the witness isn't going to choose unilaterally what is
 21 and is not produced and how and when and all that.
 22 MR. HAMAN: I did ask for it; you didn't
 23 provide it. So how can I ask questions about it when
 24 you're not going to give it.
 25 Q. (BY MR. HAMAN) So my question is -- I just

Page 87

1 need know how now -- are you going to provide me with
 2 expenditures made from the Legal Defense Fund and who
 3 they were made to?
 4 MR. FRANKLIN-MURDOCK: Object to the question
 5 because, as counsel knows, the production of written
 6 discovery is something that is handled between the
 7 attorneys through written discovery requests and, if
 8 necessary, subsequently through meeting and conferring
 9 and, if absolutely necessary, through resolution in
 10 court.
 11 THE WITNESS: The sole purpose of the Legal
 12 Defense Fund is to pay legal counsel.
 13 MR. HAMAN: I get that.
 14 And I'm going to reserve the right to come
 15 back to the line of questioning at a later deposition
 16 after we talk about getting this information.
 17 MR. FRANKLIN-MURDOCK: And I'll just note for
 18 the record there's been no correspondence from counsel
 19 regarding any of our written discovery responses.
 20 MR. HAMAN: So that's fair. And I'm saying
 21 I'm going to come back to re-depose him on this
 22 information.
 23 MR. FRANKLIN-MURDOCK: And just so the
 24 record's clear, I don't agree with that. But we can
 25 discuss that at a later date if necessary.

Page 88

1 Q. (BY MR. HAMAN) So KCRCC maintains an account
 2 for expenditures for electioneering; correct?
 3 A. Correct.
 4 Q. And it has a Legal Defense Fund account
 5 through bankcda; correct?
 6 A. Correct.
 7 Q. Any other accounts?
 8 A. A money market account.
 9 Q. And what's that used for?
 10 A. Storing funds in excess of the FDA insurance
 11 minimums -- or maximum.
 12 Q. And who holds that? What bank or institution
 13 is that with?
 14 A. Bankcda.
 15 Q. Are all the accounts with bankcda?
 16 A. Yes.
 17 Q. So are there any other accounts? Are there --
 18 A. No.
 19 Q. And the money market account is something that
 20 is -- is that reported to Secretary of State, what's in
 21 it and how it got it there?
 22 A. Well -- yes. All the -- all the money that
 23 comes in and all the money that goes out is reported to
 24 the Secretary of State.
 25 Q. And, likewise, the account that is held by the

Page 89

1 KCRCC for electioneering and whatnot --
 2 **A. No. That is the account for electioneering.**
 3 Q. Okay. And then there's -- so that's -- the
 4 money market account is the account for electioneering?
 5 **A. No.**
 6 Q. Okay. The account that is for electioneering
 7 is reported to the Secretary of State, obviously. The
 8 money market account, is that reported on tax returns
 9 and to the Secretary of State?
 10 **A. No. You're -- you're not using the terms**
 11 **correctly.**
 12 Q. Okay. Help me understand the three accounts.
 13 I understand the Legal Defense Fund. What about the
 14 other two, one's for electioneering?
 15 **A. Yes.**
 16 Q. What's -- what's the third --
 17 **A. Checking account. The checking account is**
 18 **electioneering, the money market account is used to**
 19 **store funds in excess of the FDA maximum insured amount.**
 20 Q. Okay. And the money market account is -- is
 21 that reported to any public entity?
 22 **A. Those accounts -- accounts don't get reported;**
 23 **transactions get reported.**
 24 Q. Okay. Fair. Are the transactions reported
 25 from the money market account?

Page 90

1 **A. No.**
 2 Q. Okay. They're disclosed on tax returns?
 3 **A. No.**
 4 Q. Okay.
 5 **A. The money is moved from the checking account**
 6 **to the money market account and back to the checking**
 7 **account before it's spent.**
 8 Q. Okay. And then --
 9 **A. So it's a reservoir.**
 10 Q. Okay. Okay. So when money is moved from the
 11 electioneering account, let's call it, to the money
 12 market account, that's reported to the Secretary of
 13 State?
 14 **A. No.**
 15 Q. Okay.
 16 **A. It's not a reportable event.**
 17 Q. And who has access to the money market
 18 account?
 19 **A. The treasurer and myself.**
 20 Q. Anyone else?
 21 **A. Treasurer's -- at the time the treasurer's**
 22 **husband.**
 23 Q. Does Dan Gookin have access to it?
 24 **A. No.**
 25 Q. Does Dan Gookin have access to the Legal

Page 91

1 Defense Fund account?
 2 **A. No.**
 3 Q. Can he find out anything about the -- like
 4 donors and the amount of donations to the Legal Defense
 5 Fund? Can he look at the records of the Legal Defense
 6 Fund account?
 7 **A. Yes, if he made a motion and the committee**
 8 **directed it to happen.**
 9 Q. The Central Committee or the Executive
 10 Committee?
 11 **A. The Central Committee.**
 12 Q. And, likewise, he could do that with the money
 13 market account?
 14 **A. Yes.**
 15 Q. But outside the motion process, he can't just
 16 walk in and say I want to see the records?
 17 **A. Correct. It's not a public record.**
 18 Q. Has anyone outside of yourself or the
 19 treasurer or the treasurer's husband ever asked to see
 20 the records of the -- and outside of your counsel to see
 21 the records of the Defense Fund account?
 22 **A. No, I don't believe so.**
 23 Q. Likewise, by motion, has anyone asked to see
 24 the records of the money market account?
 25 **A. No.**

Page 92

1 Q. So money that is held in the money market
 2 account can be transferred to the electioneering account
 3 to help endorse a candidate?
 4 **A. Yes.**
 5 Q. But money -- it's your testimony money in the
 6 Legal Defense Fund account cannot be used to and has not
 7 been used to help endorse a candidate?
 8 **A. Correct.**
 9 Q. Can you transfer money from Legal Defense Fund
 10 account to the money market account and back and forth?
 11 **A. No.**
 12 Q. Can you transfer money from the Legal Defense
 13 Fund account to and from the electioneering account?
 14 **A. Legal -- say that again.**
 15 Q. Can you transfer money from the Legal Defense
 16 Fund account to the electioneering account?
 17 **A. No.**
 18 Q. So I'm going to narrow it down a little bit.
 19 We've talked before about damages. You believe that
 20 this is accusing KCRCC and you, in your official
 21 capacity, as engaged in criminal activity; and if so, do
 22 you have any evidence that this has affected the
 23 standing of the KCRCC in the eyes of the community,
 24 negatively affected, I should say?
 25 **A. In what way?**

Page 93

1 Q. Negative effect of the reputation or standing
 2 of the KCRCC in the eyes of the community. That's the
 3 wording and your instruction that will be given.
 4 A. I'm sorry, say that again.
 5 Q. That is the burden that you have and the
 6 instruction that will be given to the jury.
 7 So my question is: Do you have any evidence
 8 that these statements in paragraph 13 that you feel are
 9 accusing the KCRCC and you -- and/or you, in your
 10 official capacity, have had a negative impact or effect
 11 on the reputation or standing of the KCRCC in the eyes
 12 of the community?
 13 MR. FRANKLIN-MURDOCK: Objection to the extent
 14 that it is --
 15 THE WITNESS: That -- that -- I mean, that's
 16 vague for me. I'm trying to decide if that's -- what
 17 kind of effect --
 18 MR. FRANKLIN-MURDOCK: Just objection --
 19 (Inaudible, multiple speakers.)
 20 THE COURT REPORTER: Hey, whoa, whoa.
 21 MR. HAMAN: Yeah, I can't hear either of you.
 22 THE COURT REPORTER: I didn't get it. The
 23 last answer I got was "what kind of effect," and then,
 24 Jesse, you started in, but I didn't get you.
 25 MR. FRANKLIN-MURDOCK: Really quickly just --

Page 94

1 I was lodging an objection. I'll just say form so that
 2 is on the record. And then Mr. Regan can go ahead and
 3 answer the question if he understood it.
 4 Q. (BY MR. HAMAN) It's your allegation, sir,
 5 that -- and you said this earlier in the deposition --
 6 that it has affected the reputation of the KCRCC. So my
 7 question is very simple. What evidence do you have that
 8 the reputation of the KCRCC has been negatively affected
 9 in the eyes of the community?
 10 A. It is our priority that accusing someone or a
 11 committee of committing a crime hurts their reputation.
 12 Q. And do you have any evidence that the
 13 reputation of the KCRCC has been negatively affected?
 14 A. I've gotten comments from people. I've
 15 gotten, you know, feedback from people.
 16 Q. Okay.
 17 A. That says that that's, you know, what is this
 18 all about.
 19 Q. Okay. And so we've gotten comments and
 20 feedback from people asking what is this all about. Any
 21 other evidence? I mean, that would be evidence. So
 22 anything else?
 23 A. We would do a financial analysis.
 24 Q. Okay. And what would you look for in that
 25 financial analysis?

Page 95

1 A. Trends in donation.
 2 Q. Okay. Anything else?
 3 A. Not that I can think of at this time.
 4 Q. Okay. And you would look for trends in
 5 donation to see if there's been a downward trend to help
 6 support the belief that the reputation has been
 7 negatively affected; fair?
 8 A. Fair.
 9 Q. And would you be able to separate that from
 10 the effect had by the Meyer McCrea lawsuit?
 11 MR. FRANKLIN-MURDOCK: Object to the form.
 12 THE WITNESS: I imagine you could --
 13 Q. (BY MR. HAMAN) Okay.
 14 A. -- made an interrogatory to that effect.
 15 MR. FRANKLIN-MURDOCK: And, Mike, go ahead and
 16 finish this line, but maybe after this line then we'll
 17 take that lunch break.
 18 MR. HAMAN: Okay.
 19 Q. (BY MR. HAMAN) As you sit here today, you
 20 cannot identify downward trends in donations or economic
 21 losses to the bottom line of the KCRCC directly related
 22 to the allegation -- the comments in paragraph 13 of the
 23 complaint; fair?
 24 A. Not to date, no.
 25 Q. Okay. Okay. This is a good time. And just

Page 96

1 so you know, maybe half an hour, give or take, left. So
 2 we want to take like a short break, or how you guys want
 3 to -- let's go off the record real quick. I'm sorry.
 4 (Off the record at 12:38 p.m. PST.)
 5 (On the record at 1:17 p.m., PST.)
 6 MR. HAMAN: Let's go back on the record.
 7 Q. (BY MR. HAMAN) Before we went off the record
 8 we were talking about evidence of damages and whatnot,
 9 and you had mentioned that you had received comments
 10 from people. Do you remember the names of any of these
 11 individuals?
 12 A. Not off the top of my head.
 13 Q. Did any of these individuals tell you that
 14 they were not going to donate to the KCRCC because of
 15 this lawsuit?
 16 A. I don't remember specifics.
 17 Q. Well, generally.
 18 A. Generally, they were upset.
 19 Q. Did they say they weren't going to donate?
 20 A. I don't recall.
 21 Q. And did they say they weren't going to donate
 22 because of comments made by Dan Gookin that are
 23 referenced in the complaint?
 24 A. The comments were about the Gookin -- the
 25 Gookin matter.

Page 97

1 Q. I understand that. Did they just say that
 2 they weren't going to donate?
 3 A. **I don't know that there was any context of**
 4 **asking them for a donation.**
 5 Q. Did they say anything to the effect that they
 6 don't trust the KCRCC or they don't -- they look down
 7 upon the KCRCC because of comments made by Dan Gookin?
 8 A. **Well, there's certainly comments out there to**
 9 **that extent.**
 10 Q. Okay. And then, again, I'm going to ask: Who
 11 made that comment to you?
 12 A. **Well, you showed us earlier Christa Hazel and**
 13 **Russell Mann.**
 14 Q. All right. Those weren't related to Dan
 15 Gookin. I'm asking you specifically: Did any of these
 16 people that you talked about or that said you had
 17 comments from people tell you that they looked down upon
 18 the KCRCC because of comments made by Dan Gookin that
 19 are referenced in the complaint?
 20 A. **I think if we went back on social media, we'd**
 21 **find those.**
 22 Q. I'm asking you today. Do you know?
 23 A. **I think that if we went back on social media,**
 24 **we'd find them.**
 25 Q. That's not the answer I'm look ing for,

Page 98

1 because, you see, I'm going to -- the questions I'm
 2 asking you today I'm going to ask you at trial, and at
 3 trial you're going to be held to the answer you've given
 4 me today. Okay?
 5 A. **Okay.**
 6 Q. So I'll ask you one more time. Did any of
 7 these people that you spoke with specifically say that
 8 they looked upon the KCRCC in a negative light because
 9 of comments made by Dan Gookin that are set forth in
 10 your complaint?
 11 A. **I don't recall to that level of specificity.**
 12 Q. And you don't recall the names of these
 13 people?
 14 A. **Not off the top of my head.**
 15 Q. Are you in possession of social media posts
 16 claiming -- or stating that they look down upon the
 17 KCRCC or they look negatively upon the KCRCC because of
 18 comments made by Dan Gookin that are set forth in your
 19 complaint?
 20 A. **Do I possess them?**
 21 Q. Yeah.
 22 A. **How so?**
 23 Q. I don't know, in a drawer, in a -- on a
 24 computer. Do you possess them?
 25 A. **Okay. Then, no, I don't have them in my**

Page 99

1 **physical hands.**
 2 Q. Do you have access to comments on social media
 3 in that regard, with regard to the comments made by Dan
 4 Gookin?
 5 A. **I have access to social media.**
 6 Q. Access to comments made by people that are
 7 posting negative comments about KCRCC related to
 8 comments made by Dan Gookin?
 9 A. **You're asking me again for that level of**
 10 **specificity, and I can't attest to that at this time.**
 11 Q. Do you know who the opponent is in paragraph
 12 13 that Dan's referring to?
 13 A. **"My rated and vetted criminal opponent." I**
 14 **would assume that's his opponent for the city council.**
 15 **(Door interruption.)**
 16 **THE COURT REPORTER: Get out.**
 17 **Sorry.**
 18 **MR. HAMAN: You're fine.**
 19 Q. (BY MR. HAMAN) Do you know the name of this
 20 person?
 21 A. **I believe it's Clark Albritton.**
 22 Q. Is that A-l-b-r-i-t-t-o-n, I believe?
 23 A. **I believe it's a-n, but.**
 24 Q. Is it? Okay.
 25 And he was originally a candidate for the

Page 100

1 school district trustee last year; right?
 2 A. **I believe he filed for that, yes.**
 3 Q. And then he was asked to switch to run against
 4 Gookin; right?
 5 A. **Well, he made that decision.**
 6 Q. And did someone on behalf of KCRCC ask him to
 7 do that?
 8 A. **I am not sure.**
 9 Q. You didn't ask him, did you?
 10 A. **Not personally, no.**
 11 Q. What does that mean, "not personally"?
 12 A. **I did not ask him.**
 13 Q. And KCRCC endorsed Clark in his race against
 14 Dan?
 15 A. **Yes. Well, we recommended him.**
 16 Q. What's the difference between endorsing and
 17 recommending?
 18 A. **Well, if somebody's recommended, we recommend**
 19 **them.**
 20 Q. And was he --
 21 A. **Our verbiage we use -- our verbiage we use**
 22 **"recommend."**
 23 Q. Okay. And did KCRCC donate money to his
 24 campaign?
 25 A. **No.**

Page 101

1 Q. Did you, personally?

2 A. Yes.

3 Q. How much?

4 A. Oh, I would have to check. It was probably in

5 the range of 100 to \$500.

6 Q. Doesn't the KCRCC typically donate money to

7 people that it endorses or recommends on their ballot

8 list?

9 A. No, typically, it does not.

10 Q. But it has in the past?

11 A. There have been occasions, but it's not

12 standard practice.

13 Q. Okay. Paragraph 15, "No problem last night

14 taking the KCRCC rated and vetted ballots home with him

15 to count, then the results were proclaimed this

16 morning."

17 And we've talked about this. You are -- it's

18 your position that you did not take ballots home;

19 correct?

20 A. No. It's my position that the results were

21 posted that evening and can be seen on the social media

22 account.

23 Q. Okay. Did you take ballots home on the

24 evening of the 15th or --

25 A. They were tabulated, they were put in an

Page 102

1 envelope and sealed, and I took those home, yes.

2 Q. And you're saying that the results were

3 officially proclaimed that same evening as opposed to

4 the next morning?

5 A. Yes.

6 Q. Do you find that this comment is accusing you,

7 in your official capacity, or the KCRCC of engaging in

8 criminal activity?

9 A. In an election? Yes.

10 Q. How is that criminal?

11 MR. FRANKLIN-MURDOCK: Object to form.

12 THE WITNESS: It's brought.

13 Q. (BY MR. HAMAN) Did you turn it over to the

14 prosecutor's office?

15 A. Did I turn it over to the prosecutor's office?

16 Q. Let me ask it this way: Have you asked the

17 prosecuting attorney for Kootenai County to investigate

18 criminal behavior of Dan Gookin?

19 A. No.

20 Q. Have you --

21 MR. FRANKLIN-MURDOCK: Just so we're on the

22 same page, Counsel, are you asking the witness if

23 Mr. Gookin engaged in criminal activity or if Mr. Gookin

24 in his comments made allegations of criminal activity?

25 Q. (BY MR. HAMAN) Okay. I guess let's -- the

Page 103

1 first one was engaged. How about the second one? Did

2 you ask the prosecuting attorney for Kootenai County to

3 investigate whether these comments amount to criminal

4 activity?

5 A. No.

6 Q. Did you ever ask the prosecuting attorney for

7 Kootenai County to investigate Dan Gookin in any manner

8 or any of his comments?

9 A. I can't say with certainty that question was

10 never raised.

11 Q. Question is: Did you or anyone on behalf of

12 KCRCC ask --

13 A. I know what you just asked, and I just

14 answered it. I can't be certain that nobody did that.

15 Q. Well, you would know if you did; right?

16 A. Yes.

17 Q. Did you?

18 A. No, I didn't.

19 Q. And do you know -- you're saying you can't be

20 certain someone did or didn't. My question is do you

21 know if someone did on behalf of KCRCC?

22 A. I don't know of anybody that did that on

23 behalf of KCRCC.

24 Q. Okay. And you feel this is --- comment is

25 defamatory?

Page 104

1 A. Yes.

2 Q. As opposed to being a question that he's

3 asking? He even puts a question mark after it.

4 A. It's a rhetorical.

5 Q. A rhetorical what?

6 A. Well, he's making the argument that that's

7 what happened, the results were then "proclaimed this

8 morning. Lesson learned or lesson" -- "or lesson

9 learned. Stolen election."

10 Q. Question mark, "stolen election," question

11 mark; right? Did I read that right? Question mark --

12 A. Yes, I see a question mark there. That

13 doesn't necessarily make it a question.

14 Q. You don't believe this to be an opinion or

15 hyperbole?

16 A. I think if anybody read that, they would think

17 of it as an accusation.

18 Q. Can you demonstrate -- strike that.

19 Can you pinpoint us to whether this comment

20 has caused damage to the KCRCC?

21 A. Pinpoint this one specifically? No.

22 Q. Yeah. And just like the other one, you would

23 rely on comments from people that we talked about and

24 financial analysis showing trends in donation; is that

25 fair?

Page 105

1 **A. Yes.**
2 Q. Anything else? Any other evidence you would
3 have that you would turn to to show or demonstrate that
4 this comment had a negative effect on the KCRCC in the
5 eyes of the community and/or caused damages to the
6 KCRCC? Anything else?
7 **A. Within the scope of comments and posts, no.**
8 Q. Okay. And, again, with regard to posts, you
9 don't have any, but you might -- there might be some out
10 there that you might know about?
11 **A. Yes.**
12 Q. Okay. Okay. Paragraph 17, "many precinct
13 committeeperson" -- or persons -- "had their own tally
14 cards, which aren't the official results."
15 Help me understand. Is -- are the tally cards
16 separate from the official results? I don't understand
17 how this works. I mean, so you guys have a card or
18 everyone has a card and they put -- they circle in or
19 they mark who they want to endorse, and then they turn
20 that in to the chair, and then it's voted?
21 **A. No.**
22 Q. How does it work?
23 **A. There are ballots which are distributed. The**
24 **precinct committeemen vote their ballot. The ballots**
25 **are turned in to the secretary, who notes that the**

Page 106

1 **precinct committeemen have voted. And then those**
2 **ballots are tallied on a tally sheet by the tellers.**
3 **And as soon as the tellers are done, we review the**
4 **results. Everybody that's there can look over their**
5 **shoulders and see what's happening. And then that --**
6 **that tally sheet, we take a picture of it and post it on**
7 **social media.**
8 Q. Okay. So what is a "tally card"?
9 **A. I have no idea.**
10 Q. If he's referring to a ballot, then that would
11 be accurate, that every precinct committeeperson has a
12 ballot; is that correct?
13 **A. Well, the statement says, "many PCs had their**
14 **own tally cards." That doesn't seem to refer to a**
15 **ballot, no.**
16 Q. But you don't know what -- but you don't know
17 what a tally card is, so we don't know what he's
18 referring to; is that fair?
19 **A. That is fair.**
20 Q. Okay. The ballots -- so I'm just now asking a
21 question. Ballots are not the official results. The
22 official results is the final tally sheet; right?
23 **A. Correct.**
24 Q. Okay. And the final tally sheet is what's put
25 on social media?

Page 107

1 **A. Correct.**
2 Q. So what's wrong with this comment here, this
3 somewhat confusing comment in paragraph 17?
4 **A. Well, it's not accurately portraying what**
5 **happened.**
6 Q. Okay. Is it criminal? Is this accusing you
7 in your official capacity or the KCRCC in engaging in
8 criminal behavior or conduct?
9 **A. It's inferring that there's results which**
10 **aren't official, that what you see on social media is**
11 **not the official results.**
12 Q. Are you aware of whether committeepersons have
13 ever posted their own ballots -- I'm going to say the
14 word "ballots" -- on social media?
15 **A. I'm not aware of that happening, no.**
16 Q. And I apologize, it's been -- we've been
17 going, like, four hours or whatnot.
18 Didn't, in 2022, the rating and vetting card
19 omit Ron Hartman, who was running for highway district,
20 but was later endorsed?
21 **A. Yes.**
22 Q. Did you ask -- strike that.
23 So if there's evidence that ballots, or as Dan
24 uses the word "tally cards," are on social media, then
25 that would be a truthful statement; right? Whether you

Page 108

1 -- whether they should do it or not, it would be a
2 truthful statement?
3 **A. "Be aware that many PCs, precinct**
4 **committeemen, had their own tally cards, which aren't**
5 **the official results. These are what you see on social**
6 **media."**
7 **I saw no evidence that they were posting it on**
8 **social media, so I can't see how that statement could be**
9 **true.**
10 Q. And you believe that this is a comment that is
11 accusing you or KCRCC of engaging in criminal behavior
12 even though it's directed at PC, precinct
13 committeepersons?
14 **A. It is -- it is inferring that there was fraud**
15 **in the process.**
16 Q. And with regard to this comment, any evidence
17 that -- other than what you've told me about comments
18 from --
19 **A. Excuse me.**
20 Q. You're fine.
21 **A. I wanted to correct what I just said. It is**
22 **implying, not inferring. The listener infers. So it is**
23 **implying that there is fraud in the process.**
24 Q. Okay. Well, fraud can be criminal or not. I
25 mean, there's civil fraud and there's criminal fraud.

Page 109

1 Do you believe this rises to the level of criminal
 2 behavior?
 3 **A. I'm not an attorney.**
 4 Q. And other than comments from people and
 5 financial analysis to show a trend in donations, do you
 6 have any evidence or any other evidence that this -- the
 7 comments in paragraph 17 have caused the KCRCC damages?
 8 **A. No.**
 9 Q. I believe paragraph 19 is the last one -- I'll
 10 double check in a moment -- but "Brent sent out the
 11 results of last night's KCRCC sham to all PC members.
 12 All but one, that is."
 13 Okay. Then in paragraph 20 you say that he
 14 intention -- that Dan intentionally -- is accusing you
 15 and KCRCC of intentionally withholding results from
 16 certain committeepersons. I don't -- where does he use
 17 the word "intent" in paragraph 19? I'm not seeing it.
 18 **MR. FRANKLIN-MURDOCK:** Object to form.
 19 Q. (BY MR. HAMAN) "Intentionally withheld
 20 results from certain committeepersons in an attempt to
 21 facilitate their desired results."
 22 How do you get that from the comment in 19?
 23 What's the link?
 24 **A. "Facilitate."**
 25 Q. Yeah, but he's not saying -- he's not saying

Page 110

1 that in paragraph 19, is he?
 2 **MR. FRANKLIN-MURDOCK:** Objection.
 3 Argumentative.
 4 **THE WITNESS:** He's saying that the KCRCC
 5 rating and vetting is a sham.
 6 Q. (BY MR. HAMAN) Because the results were sent
 7 to everybody but one; right?
 8 **MR. FRANKLIN-MURDOCK:** Object to form.
 9 **THE WITNESS:** They were sent to everybody.
 10 Q. (BY MR. HAMAN) Okay. And if they were not
 11 sent to everybody, then that would be a truthful
 12 statement; right?
 13 **A. No. The rating and vetting sham would not be
 14 truthful.**
 15 Q. Well, if it omits an individual named Ron
 16 Hartman, who is later endorsed, could someone believe
 17 that to be a sham?
 18 **MR. FRANKLIN-MURDOCK:** Objection.
 19 Q. (BY MR. HAMAN) You already said that Ron
 20 Hartman was omitted and then later endorsed in 2022. So
 21 could someone look at that and say, well, this is a
 22 sham?
 23 **A. Not someone familiar with that process and
 24 those particulars.**
 25 **THE COURT REPORTER:** Did you object?

Page 111

1 **MR. FRANKLIN-MURDOCK:** Yes, thanks, to form.
 2 Q. (BY MR. HAMAN) Isn't the word "sham" an
 3 opinion?
 4 **MR. FRANKLIN-MURDOCK:** Objection. Calls for a
 5 legal conclusion.
 6 **THE WITNESS:** I --
 7 **MR. HAMAN:** It's common, everyday
 8 understanding.
 9 **MR. FRANKLIN-MURDOCK:** In this case it isn't.
 10 It calls for a legal conclusion.
 11 **THE WITNESS:** A sham would be a fraud.
 12 Q. (BY MR. HAMAN) And could also be an opinion;
 13 right?
 14 **MR. FRANKLIN-MURDOCK:** Object to form.
 15 Q. (BY MR. HAMAN) One could interpret this to be
 16 an opinion; is that fair?
 17 **MR. FRANKLIN-MURDOCK:** Objection. Asked and
 18 answered.
 19 **MR. HAMAN:** No, that question was not asked.
 20 **THE WITNESS:** Making a direct statement that
 21 rating and vetting is a sham. He doesn't say "in my
 22 opinion" or "this is what I think." He said, "it's a
 23 fact, it's a statement of fact."
 24 Q. (BY MR. HAMAN) So do you find this to be
 25 criminal?

Page 112

1 **A. Well, it goes to the fraud of the process.**
 2 Q. That's a lot worse than accusing -- someone
 3 accusing you or KCRCC of endorsing white nationalists
 4 and liars and being corrupt, right, in your opinion?
 5 **A. This is worse than that?**
 6 Q. Is that your opinion?
 7 **A. Yes.**
 8 Q. This is worse than accusing you of endorsing a
 9 white supremacist?
 10 **MR. FRANKLIN-MURDOCK:** Objection. Asked and
 11 answered, badgering the witness.
 12 Q. (BY MR. HAMAN) I'm not. I'm trying to get an
 13 idea what he finds to be defamatory and what's not.
 14 **A. Is there a question?**
 15 Q. Okay. How about I'll just put it this way:
 16 Accusing KCRCC of being corrupt and liars, corrupt would
 17 be a criminal conduct, right, corruption?
 18 **A. Yes.**
 19 **MR. FRANKLIN-MURDOCK:** Object to form.
 20 Q. (BY MR. HAMAN) You didn't sue Mr. Mann for
 21 his allegation that the KCRCC was corrupt, did you?
 22 **A. Well, the KCRCC is doing the sulng, not me.**
 23 Q. I'm asking you in your official capacity.
 24 **A. What is the question, again?**
 25 Q. You didn't sue Mr. Mann for accusing the KCRCC

Page 113

1 of being corrupt or engaging in corruption, did you?
 2 **A. Haven't sued Mr. Mann yet.**
 3 **Q. So you might?**
 4 What are the defamatory comments alleged to
 5 have been promulgated by you in the Meyers McCre
 6 lawsuit?
 7 **A. It's their --**
 8 **MR. FRANKLIN-MURDOCK:** Mike, that's not
 9 relevant. We're here to talk about the Gookin lawsuit.
 10 **MR. HAMAN:** I think hypocrisy is relevant. I
 11 think hypocrisy is the cornerstone of our system.
 12 **MR. FRANKLIN-MURDOCK:** Why is it relevant? I
 13 mean, I'm not --
 14 **MR. HAMAN:** I'll strike -- I'll strike the
 15 question.
 16 **MR. FRANKLIN-MURDOCK:** All right. That's
 17 fine.
 18 **Q. (BY MR. HAMAN)** You're sure that Dan got the
 19 results?
 20 **A. I'm sorry. What?**
 21 **Q. He says he never got the results. You sure he**
 22 **got them?**
 23 **A. They were sent, and they also posted on social**
 24 **media.**
 25 **Q. Well, if his email was not included in the**

Page 114

1 chain of emails or the string, wouldn't that be a
 2 truthful statement that all but one, that is, I got
 3 nothing?
 4 **A. I -- I have no idea how that would have**
 5 **happened. It's a copy-and-paste from our list for the**
 6 **emails.**
 7 **Q. Have you seen that email?**
 8 **A. I don't believe so.**
 9 **Q. I disclosed it in discovery, and I can**
 10 **represent to you his email was excluded from everyone**
 11 **else. Do you know why that's true, why he would have**
 12 **been the only one excluded?**
 13 **A. Which -- which email is this?**
 14 **Q. The one we're referring to, the email posting**
 15 **the results, that it went to everybody on**
 16 **September 15th, 2023.**
 17 **A. Okay. I would need to see that.**
 18 **Q. I sent it to you.**
 19 **A. Just now?**
 20 **Q. No, about several months ago.**
 21 **A. Oh.**
 22 **MR. FRANKLIN-MURDOCK:** If you want to ask him
 23 about the email, why don't you pull it up.
 24 **MR. HAMAN:** I don't have it with me. Let me
 25 look, take a break.

Page 115

1 **MR. FRANKLIN-MURDOCK:** Sure.
 2 Jahnene, we're off the record.
 3 (Off the record at 1:45 p.m., PST.)
 4 (On the record at 1:49 p.m., PST.)
 5 **MR. HAMAN:** Let's go back on the record.
 6 **Q. (BY MR. HAMAN)** Let me ask it this way: If
 7 his email was excluded, then that would be a truthful
 8 statement, hypothetically; correct?
 9 **A. No. Says the rating and vetting system's a**
 10 **sham.**
 11 **Q. Okay. You're not following me. We were**
 12 **talking about whether he received the results. He's**
 13 **saying he did not get them. It was --**
 14 **A. It was posted on social media --**
 15 **Q. Let me ask my question, please. The results**
 16 **were sent out by email. I don't care if they were**
 17 **posted on social media, I don't care if they were put in**
 18 **the newspaper. We're talking about the email, the**
 19 **results sent out to everybody but one.**
 20 **If he did not get the results via email and**
 21 **everybody else did, wouldn't that be a truthful**
 22 **statement, hypothetically?**
 23 **MR. FRANKLIN-MURDOCK:** Objection. Asked and
 24 answered.
 25 **MR. HAMAN:** No, it's not been answered.

Page 116

1 **THE WITNESS:** I cannot testify as to whether
 2 or not he received an email that was sent.
 3 **Q. (BY MR. HAMAN)** That's not what I'm asking.
 4 I'm asking hypothetically if he didn't receive it, would
 5 that be a truthful statement?
 6 **MR. FRANKLIN-MURDOCK:** Same objection.
 7 **THE WITNESS:** Factors could have interfered
 8 with him receiving it, not related to sending it. So,
 9 no, that would not be a truthful statement in that case.
 10 **Q. (BY MR. HAMAN)** We didn't talk about factors.
 11 It just says he didn't get it. If he didn't get it, he
 12 didn't get it.
 13 **A. Again, it could have gone to his -- it could**
 14 **have gone to his spam box, it could have gone somewhere**
 15 **else. I don't know.**
 16 **Q. Says he checked it --**
 17 **A. I'm not on his end of the email chain.**
 18 **Q. You have a personal problem with Dan, don't**
 19 **you?**
 20 **A. Personal?**
 21 **Q. Yeah.**
 22 **A. No.**
 23 **Q. You've had it for some time, haven't you?**
 24 **A. No.**
 25 **MR. FRANKLIN-MURDOCK:** Object to form.

Page 117

1 Q. (BY MR. HAMAN) How come you're not suing Mann
 2 and Hazel and Mary Souza?
 3 A. Haven't gotten around to it.
 4 Q. How has this comment caused damages?
 5 A. We were just over this, but --
 6 Q. Not this particular one, no, we haven't. We
 7 haven't talked about that yet. I know my questions.
 8 A. State your question again, then.
 9 Q. How has this comment or the comments in
 10 paragraph 19 damaged the KCRCC?
 11 A. It implies that the rating and vetting system
 12 is a sham.
 13 Q. And what -- and in addition to comments from
 14 people you don't know or can't remember and social media
 15 posts that you don't know of but might have and a trend
 16 in donations, anything else, any other evidence that
 17 would show that this damaged KCRCC?
 18 A. Would seem those -- that would be the way it
 19 would manifest, yes.
 20 MR. HAMAN: Let's take a couple minutes. I
 21 think I'm done, but I want to look just to check my
 22 notes.
 23 (Off the record at 1:52 p.m. PST.)
 24 (On the record at 1:57 p.m., PST.)
 25 MR. HAMAN: We'll go back on the record.

Page 118

1 Q. (BY MR. HAMAN) Just a couple more questions.
 2 In the McCrea suit, have you been deposed in that?
 3 A. No.
 4 Q. Has anyone from KCRCC been deposed, to your
 5 knowledge?
 6 A. No.
 7 Q. And then back to these -- the comments you've
 8 had with various people about this lawsuit and comments
 9 made by Dan Gookin. Has anyone not associated with
 10 KCRCC commented to you about this lawsuit and the
 11 comments made by Dan Gookin that are set forth in the
 12 complaint?
 13 A. "Not associated" being not a precinct
 14 committeeman?
 15 Q. Yes, not a member.
 16 A. Not a member. Yes.
 17 Q. Who?
 18 A. Dan Pinkerton, for one.
 19 Q. Okay. What did he say?
 20 A. He was upset at the allegations.
 21 Q. When was -- when did he have this chat with
 22 you? Like the time frame?
 23 A. Well, obviously, after we filed the suit --
 24 not -- I'm sorry. It was before we filed suit.
 25 Q. Do you know if he donates money to the KCRCC?

Page 119

1 A. Yes, he does --
 2 Q. And was he --
 3 A. -- and donors to the Legal Defense Fund.
 4 Q. Has he stopped his donations or support of the
 5 KCRCC?
 6 A. Yes.
 7 Q. When did he stop his support?
 8 A. Just recently.
 9 Q. Like in the last month? Two months?
 10 A. Yes. We approached him to support the
 11 Republican Gala, and he declined.
 12 Q. Did he say why?
 13 A. No.
 14 Q. Other than Mr. Pinkerton, anyone else that you
 15 can think of?
 16 A. Not at the moment.
 17 Q. And the social media posts that you
 18 referenced, are those posts by members of the KCRCC?
 19 A. No.
 20 Q. So you are aware of posts by people who are
 21 not affiliated or not members of the KCRCC commenting
 22 about this lawsuit and the comments by Dan Gookin?
 23 A. Yes.
 24 Q. Were they to your personal social media pages,
 25 or were they posts to KCRCC pages?

Page 120

1 A. They were their own posts.
 2 Q. And you've captured some of these or someone
 3 on behalf of KCRCC has captured them?
 4 A. I don't know that for sure.
 5 Q. Okay. And in any of the posts that you have
 6 read, have any of them said they are not going to send
 7 money or donate money to KCRCC anymore because of this?
 8 A. Yes.
 9 Q. And do you remember the author of that, of
 10 those posts?
 11 A. Not off the top of my head, but I do now
 12 recall that conversation.
 13 Q. One that you can think of?
 14 A. Yes. It was in a public setting.
 15 Q. Okay. Like Facebook or Twitter or whatever
 16 they call it, X?
 17 A. No. It was in person.
 18 Q. Okay. Not a post. So this was in person?
 19 A. Correct.
 20 Q. And you don't remember the name of the person?
 21 A. Not off the top of my head, but I -- no.
 22 Q. Do you know approximately when was this? Was
 23 it in the fall? Winter? Spring? Recently?
 24 A. Spring.
 25 Q. Of 2024, okay.

Page 121

1 A. Yeah.

2 Q. And did that person say that they would no

3 longer donate money?

4 A. Correct.

5 Q. Did that person comment in his or her

6 discussions with you about the McCrea suit against

7 KCRCC?

8 A. No.

9 Q. Was it a man or a woman?

10 A. Woman.

11 Q. Do you know where it was at? Like, was it

12 downtown? At a restaurant?

13 A. It was at Candlelight Church.

14 Q. And now that we're remembering approximately

15 when and the location, does -- and it's a female -- does

16 that help ring a bell who the person is?

17 A. I can place her face but not the name.

18 Q. Anyone else you can think of right now? So

19 we've got this unnamed woman and Dan Pinkerton.

20 A. That's all I got for now.

21 Q. Okay.

22 MR. HAMAN: I don't believe I have any further

23 questions at this time. I'll take off the sharescreen.

24 Hold on. Make sure there's no other comments that you

25 -- yeah, okay.

Page 122

1 Your attorney might have some questions.

2 Court reporter might have some spelling questions. And

3 I might some followups, but we'll see how it goes.

4 Thank you for your time.

5 THE WITNESS: Okay.

6 MR. FRANKLIN-MURDOCK: Just a few questions,

7 Mr. Regan.

8 EXAMINATION

9 QUESTIONS BY MR. FRANKLIN-MURDOCK:

10 Q. First of all, are you an attorney?

11 A. No.

12 Q. Do you generally understand that there is a

13 crime called "fraud"?

14 A. Yes.

15 Q. And do you also understand generally that

16 there's a civil wrong that is also referred to as

17 "fraud"?

18 A. Yes.

19 Q. And do you, as a nonlawyer, have an exact

20 understanding of where that line is between civil fraud

21 and criminal fraud?

22 A. No.

23 Q. And is it your understanding, though, however,

24 that even civil fraud can be highly damaging to an

25 organization, accusation of civil fraud?

Page 123

1 A. Yes.

2 Q. Okay. And I'm going to try to share my screen

3 with you. I don't -- since I'm not the taking attorney,

4 we'll see if it works, but I'm going to try. Okay, it

5 worked.

6 All right. Do you see the complaint in front

7 of you?

8 A. Yes.

9 Q. And we had --- do you remember --

10 MR. FRANKLIN-MURDOCK: I apologize, Counsel,

11 is it pronounced "Haman" or "Hamen"?

12 MR. HAMAN: "Haman."

13 Q. (BY MR. FRANKLIN-MURDOCK) Do you recall

14 Mr. Haman asking you about what we described in the

15 complaint as "Post 4"? Many PCs --

16 A. Yeah, the tally cards, yes.

17 Q. Do you see here that it was alleged that

18 Gookin posted the following on X as a reply to Post 3?

19 A. Okay.

20 Q. Do you remember that?

21 A. Yes.

22 Q. And Post 3 is, "He had no problem last night

23 taking the KCRCC rated and vetted ballots home with him

24 to count." Do you see that?

25 A. Yes.

Page 124

1 Q. And pulling up this, what we've marked for

2 Thursday's purposes as Exhibit 9, which has Posts 3 and

3 4 together. Do you see that?

4 A. Yes.

5 Q. And does that line connecting the two posts

6 indicate to you that Post 4 was, in fact, a reply to

7 Post 3?

8 A. Yes.

9 Q. So does the fact that the second post, the one

10 about nonofficial results being posted on social media,

11 the fact that it was posted in reply to the tweet about

12 the so-called stolen election, does that have any

13 significance?

14 A. Yes.

15 Q. What's the significance?

16 A. That they're tied together; this is a

17 continuation of the argument.

18 Q. And what is that argument?

19 A. That the -- that the KCRCC rated and vetted

20 was -- was fraudulent in some way and that election

21 fraud was -- was -- occurred.

22 MR. FRANKLIN-MURDOCK: Thank you, Mr. Regan.

23 That's all I've got.

24 MR. HAMAN: Nothing further, nothing.

25 MR. FRANKLIN-MURDOCK: And we will read and

Page 125

1 sign.
 2 MR. HAMAN: Let's go off the record. I'll
 3 take an -- I'll order, ma'am.
 4 (Deposition concluded at 2:07 p.m., PST.)
 5 (Signature requested.)
 6
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 14
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 16
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 24
 25


Page 126

1 CERTIFICATE OF WITNESS
 2 I, BRENT F. REGAN, being first duly sworn,
 3 depose and say:
 4 That I am the witness named in the foregoing
 5 deposition, consisting of pages 1 through 128; that I
 6 have read said deposition and know the contents thereof;
 7 that the questions contained therein were propounded to
 8 me; and that the answers contained therein are true and
 9 correct, except for any changes that I may have listed
 10 on the Change Sheet attached hereto:
 11 DATED this ____ day of _____, 20__.
 12
 13 _____
 14 BRENT F. REGAN
 15
 16 SUBSCRIBED AND SWORN to before me this ____ day
 17 of _____, 20__.
 18
 19 _____
 20 NAME OF NOTARY PUBLIC
 21
 22 NOTARY PUBLIC FOR _____
 23 RESIDING AT _____
 24 MY COMMISSION EXPIRES _____
 25

Page 127

1 ERRATA SHEET FOR BRENT F. REGAN
 2 Page ____ Line ____ Reason for Change _____
 3 Reads _____
 4 Should Read _____
 5
 6 Page ____ Line ____ Reason for Change _____
 7 Reads _____
 8 Should Read _____
 9
 10 Page ____ Line ____ Reason for Change _____
 11 Reads _____
 12 Should Read _____
 13
 14 Page ____ Line ____ Reason for Change _____
 15 Reads _____
 16 Should Read _____
 17
 18 Page ____ Line ____ Reason for Change _____
 19 Reads _____
 20 Should Read _____
 21
 22 Page ____ Line ____ Reason for Change _____
 23 Reads _____
 24 Should Read _____
 25 You may use another sheet if you need more room.
 26 WITNESS SIGNATURE _____

Page 128

1 REPORTER'S CERTIFICATE
 2 I, JAHNENE ADMIRE, Certified Shorthand Reporter,
 3 certify:
 4 That the foregoing proceedings were taken before
 5 me at the time and place therein set forth, at which
 6 time the witness was put under oath by me;
 7 That the testimony and all objections made were
 8 recorded stenographically by me and transcribed by me or
 9 under my direction;
 10 That the foregoing is a true and correct record
 11 of all testimony given, to the best of my ability;
 12 I further certify that I am not a relative or
 13 employee of any attorney or party, nor am I financially
 14 interested in the action.
 15 IN WITNESS WHEREOF, I set my hand and seal this
 16 10th day of July, 2024.
 17
 18 
 19 _____
 20
 21 JAHNENE ADMIRE, CSR No. 760, RPR
 22 Notary Public
 23 816 E Sherman Avenue, Suite 7
 24 Coeur d'Alene, Idaho 83814
 25 Commission expires May 04, 2030

	107:6;108:11;109:14; 112:2,3,8,16,25	54:1;55:25;56:11,25; 57:11,18;58:11;59:5; 65:13,14;73:18;100:3, 13;121:6	Anita (2) 54:3;55:16 announced (1) 81:14 Annual (1) 24:9 annually (1) 25:1 answered (9) 44:2,3;45:25;74:9; 103:14;111:18;112:11; 115:24,25 anticipation (1) 52:16 anymore (2) 56:20;120:7 apologist (2) 74:2,3 apologize (4) 18:10,15;107:16; 123:10 appear (1) 51:15 approach (4) 40:4,5,13,14 approached (1) 119:10 appropriate (4) 65:5,6,10,11 approval (5) 43:6,19;44:25;59:10, 10 approved (5) 43:20;50:13,16,20; 80:21 approximately (4) 8:8;28:10;120:22; 121:14 argument (3) 104:6;124:17,18 argumentative (3) 33:8;48:19;110:3 arm (1) 14:14 around (3) 32:13;34:20;117:3 arrangement (1) 5:9 Aside (1) 49:23 assembly (2) 12:10;42:2 associated (4) 62:7;84:20;118:9,13 assume (4) 11:17;18:4;67:25; 99:14 attached (1) 126:10 attempt (1) 109:20 attest (1) 99:10	attorney (10) 70:2,9;75:4;102:17; 103:2,6;109:3;122:1, 10;123:3 attorney-client (1) 60:2 attorneys (2) 5:1;87:7 August (1) 42:25 author (1) 120:9 authorization (1) 20:16 authorized (4) 20:13,13,15,15 available (1) 21:1 aware (11) 17:4;22:24;60:10; 68:7;72:19,20;73:2; 107:12,15;108:3; 119:20 away (1) 22:3
\$	achieving (1) 9:7	agenda (2) 41:16;42:20		
\$5,000 (2) 85:20,25	acknowledge (2) 5:2,5	agent (2) 6:12;18:19		
\$500 (1) 101:5	acting (1) 70:9	ago (3) 28:10;75:2;114:20		
/	action (3) 41:1;42:6;58:10	agree (7) 5:16,19;33:18,21,23; 46:7;87:24		
/// (1) 5:25	activate (1) 25:9	agreed (2) 35:9,14		
I	activities (2) 70:24;74:24	agreement (2) 5:11,12		
[phonetic] (1) 78:23	activity (16) 65:13;66:22;69:4,14, 21;70:13,20;71:16,22; 75:15;83:3;92:21; 102:8,23,24;103:4	ahead (5) 30:9;35:4,5;94:2; 95:15		
A	Actually (4) 16:3;27:6;28:15; 34:15	ain't (1) 32:12		
able (3) 17:25;55:14;95:9	add (1) 20:10	Albritton (1) 99:21		
absolutely (1) 87:9	addition (1) 117:13	A-l-b-r-i-t-t-o-n (1) 99:22		
acceptable (1) 18:21	address (3) 16:18;17:2;23:15	allegation (6) 32:7;69:2;75:22; 94:4;95:22;112:21		
access (11) 16:5;18:5;20:1;23:7; 58:25;90:17,23,25; 99:2,5,6	addresses (1) 35:2	allegations (7) 57:18;65:12;66:22; 70:12,14;102:24; 118:20		
accessing (1) 20:18	adjourn (1) 81:14	allege (1) 82:18		
accommodate (1) 18:24	Administration (1) 16:15	alleged (7) 39:1;44:24;49:23; 57:10;69:12;113:4; 123:17		
accord (1) 60:24	admissible (1) 31:16	allegedly (2) 71:21;72:10		
accordance (1) 35:15	advance (1) 14:1	alleges (1) 73:8		
account (46) 20:1;27:15,25;28:7; 30:2;31:25;32:11; 53:14;82:24;85:2;88:1, 4,8,19,25;89:2,4,4,6,8, 17,17,18,20,25;90:5,6, 7,11,12,18;91:1,6,13, 21,24;92:2,2,6,10,10, 13,13,16,16;101:22	advice (3) 60:20,22,25	allowed (1) 86:9		
accounts (7) 32:8;88:7,15,17; 89:12,22,22	advised (1) 60:18	along (1) 28:22		
accurate (7) 26:2;29:12,13,14; 54:14,15;106:11	advocate (1) 14:8	always (2) 81:10;86:17		
accurately (1) 107:4	affected (7) 52:24;92:22,24;94:6, 8,13;95:7	ameliorated (1) 34:3		
accusation (2) 104:17;122:25	affiliated (1) 119:21	amount (6) 16:1;30:3;31:3; 89:19;91:4;103:3		
accused (2) 69:2;70:22	affiliations (1) 19:17	a-n (1) 99:23		
accusing (18) 66:11;69:20;73:22; 75:14;83:1,21;92:20; 93:9;94:10;102:6;	again (27) 7:1,8;10:13;13:4; 23:16;29:2;33:10; 39:25;43:1;46:1,15; 51:14;54:8;59:22; 60:10;62:4;66:14;83:5; 84:9;92:14;93:4;97:10; 99:9;105:8;112:24; 116:13;117:8	analysis (9) 47:19,22;48:5,7; 52:20;94:23,25; 104:24;109:5		
	against (21) 6:21;20:15;31:22; 36:19;41:2;42:7;53:25;	and/or (4) 69:3;83:22;93:9; 105:5		
			B	
			Back (21) 19:25;22:5;32:1; 40:16;41:18;50:15; 51:19;53:7,12;55:7; 64:19;87:15,21;90:6; 92:10;96:6;97:20,23; 115:5;117:25;118:7	
			background (1) 6:24	
			badgering (1) 112:11	
			ballot (6) 81:17;101:7;105:24; 106:10,12,15	
			ballots (15) 80:6,9;81:17;101:14, 18,23;105:23,24;106:2, 20,21;107:13,14,23; 123:23	
			Bank (11) 15:8,9;27:15,24; 28:1;32:7;53:14;84:19, 20,24;88:12	
			bankcda (5) 28:1,3;88:5,14,15	
			banks (2) 28:6;49:12	
			Barb (2) 80:17,25	
			Barbara (2) 78:22;79:7	
			based (10) 12:3;31:11;32:20; 33:2;35:16;57:3,10,18, 23;61:25	

<p>basically (1) 59:3</p> <p>basis (1) 74:7</p> <p>Bateson (1) 78:22</p> <p>bear (1) 66:17</p> <p>bearing (2) 85:8,16</p> <p>become (7) 9:13,14,23,23;10:2; 11:2,5</p> <p>becomes (1) 10:5</p> <p>Beesley (2) 80:16,25</p> <p>beforehand (1) 53:18</p> <p>beginning (2) 58:8;83:15</p> <p>behalf (15) 45:1,1,18;49:3;59:6, 12,13;61:9;65:2;70:9; 100:6;103:11,21,23; 120:3</p> <p>behavior (4) 102:18;107:8; 108:11;109:2</p> <p>belief (1) 95:6</p> <p>Bell (2) 40:12;121:16</p> <p>best (10) 9:1;27:11,19;28:23; 29:3;36:4;38:6;42:8; 54:10;76:11</p> <p>Beverly (2) 39:24;40:2</p> <p>bifocal (1) 43:16</p> <p>birth (1) 6:9</p> <p>bit (8) 13:18;18:14,16; 25:11;69:9;70:11;82:7; 92:18</p> <p>Blow (1) 66:18</p> <p>board (1) 8:9</p> <p>Bob (1) 58:19</p> <p>body (2) 10:16;42:17</p> <p>boiler (1) 82:1</p> <p>Borley (3) 23:14,17,18</p> <p>B-o-r-l-e-y (1) 23:19</p> <p>both (2) 34:1;65:16</p>	<p>bottom (1) 95:21</p> <p>box (3) 11:11;16:19;116:14</p> <p>break (11) 18:23;19:1;37:23; 54:24;55:8;75:2,3; 82:7;95:17;96:2; 114:25</p> <p>breaking (1) 75:23</p> <p>Brent (10) 5:20;6:1,8;55:23; 79:6,7;82:23;109:10; 126:2,14</p> <p>briefly (1) 6:23</p> <p>bring (6) 40:18,23;41:1;44:20; 46:24;79:25</p> <p>bringing (4) 42:6,13;43:4;59:5</p> <p>Brooke (1) 58:19</p> <p>B-r-o-o-k-e (1) 58:20</p> <p>brought (10) 40:18;41:19;42:7,19; 44:23;45:4;46:23,24; 53:25;102:12</p> <p>Bryan (1) 5:22</p> <p>Budget (9) 12:5;13:14;20:17,20, 23;21:1,3,4;67:18</p> <p>budgeting (1) 20:25</p> <p>Building (1) 16:15</p> <p>burden (3) 84:6,17;93:5</p> <p>Burlingame (3) 7:7,9,11</p> <p>Bushnell (1) 73:9</p> <p>business (3) 23:20,22;44:17</p> <p>businesses (2) 15:6,25</p> <p>bylaw (1) 76:9</p> <p>bylaws (8) 11:10;12:5,19,20; 13:11,16;24:23;67:19</p>	<p>120:16</p> <p>called (3) 68:9;78:6;122:13</p> <p>calling (3) 68:8;70:14;71:7</p> <p>Calls (2) 111:4,10</p> <p>Camarena (3) 54:3;55:16,19</p> <p>C-a-m-a-r-e-n-a (1) 55:16</p> <p>came (6) 40:7;62:9,15;81:18; 82:21;83:16</p> <p>Campaign (9) 12:6;50:22,23;63:2, 8,9,10;82:20;100:24</p> <p>Can (75) 6:6;8:6,21;9:1;10:2, 2,17;12:2;14:2,7; 17:15;18:3,13;20:1,14, 22;16,25;24:18;25:10, 12;26:23;31:17,20; 33:13,20;34:5,10,13, 16;35:5,19;36:3,4; 37:23;49:8,11;51:5; 52:19;54:21,25;56:20; 59:23;62:2;67:1;72:6; 74:3;75:4,5;79:25; 83:10;84:3,10,14;86:6, 23;87:24;91:3,5;92:2, 9,12,15;94:2;95:3; 101:21;104:18,19; 106:4;108:24;114:9; 119:15;120:13;121:17, 18;122:24</p> <p>candidate (3) 92:3,7;99:25</p> <p>candidates (4) 9:9;76:15,18;79:2</p> <p>Candlelight (1) 121:13</p> <p>capacity (25) 13:25;18:18;19:10, 23;20:18;50:18;59:25; 60:6;61:9;62:7;63:15; 64:4;65:15;66:3;68:8, 20;69:3;75:15;83:2,22; 92:21;93:10;102:7; 107:7;112:23</p> <p>captured (2) 120:2,3</p> <p>card (7) 75:19;82:16;105:17, 18;106:8,17;107:18</p> <p>cards (6) 105:14,15;106:14; 107:24;108:4;123:16</p> <p>care (2) 115:16,17</p> <p>case (5) 33:17;36:21;52:21; 111:9;116:9</p>	<p>cast (1) 81:7</p> <p>cause (1) 6:3</p> <p>caused (4) 104:20;105:5;109:7; 117:4</p> <p>cease (6) 59:7,14,20;60:6; 63:22;68:12</p> <p>Central (37) 6:13;8:17;10:18; 11:24;13:24;16:20; 41:20,21,24;42:1,8,17, 20;43:6,9,19,19;44:14, 24;46:23;55:22;58:21; 65:13,14;67:16,17; 76:20,25;77:4,6,12,20; 80:5,14;81:16;91:9,11</p> <p>certain (5) 56:6;103:14,20; 109:16,20</p> <p>certainly (4) 33:7;73:20;75:4; 97:8</p> <p>certainty (1) 103:9</p> <p>CERTIFICATE (1) 126:1</p> <p>cetera (1) 13:15</p> <p>chain (2) 114:1;116:17</p> <p>chair (6) 50:23;67:9,11,14,18; 105:20</p> <p>chairman (22) 6:18;9:21;11:3,5,7,8, 9,9,10,15;12:13,15,16, 24;13:8,10;50:18;65:2; 66:2;68:9;78:12,21</p> <p>Change (1) 126:10</p> <p>changes (2) 63:4;126:9</p> <p>characterization (1) 56:6</p> <p>chart (1) 11:11</p> <p>chat (1) 118:21</p> <p>check (8) 15:12,14,24;20:16; 54:21;101:4;109:10; 117:21</p> <p>checked (1) 116:16</p> <p>checking (4) 89:17,17;90:5,6</p> <p>choose (2) 60:23;86:20</p> <p>choppy (1) 62:20</p>	<p>chose (1) 50:4</p> <p>Christ (1) 56:18</p> <p>Christa (3) 72:21;73:18;97:12</p> <p>C-h-r-i-s-t-a (1) 72:21</p> <p>Church (1) 121:13</p> <p>circle (1) 105:18</p> <p>city (1) 99:14</p> <p>civil (7) 14:23;58:10;108:25; 122:16,20,24,25</p> <p>claim (2) 14:19;36:19</p> <p>claimed (1) 47:25</p> <p>claiming (2) 48:9;98:16</p> <p>claims (7) 6:20;14:15;31:13,21; 55:24;69:11;70:22</p> <p>clarify (2) 25:10;59:1</p> <p>Clark (2) 99:21;100:13</p> <p>clean (1) 62:18</p> <p>clear (4) 6:16;45:12;74:8; 87:24</p> <p>clearly (3) 19:5;25:12;60:21</p> <p>client (3) 34:11;70:9;85:14</p> <p>closely (1) 73:6</p> <p>Coeur (6) 3:6;8:9;28:1;58:11, 21;72:25</p> <p>college (2) 7:14,17</p> <p>coming (1) 24:6</p> <p>comment (15) 69:14;83:1;97:11; 102:6;103:24;104:19; 105:4;107:2,3;108:10, 16;109:22;117:4,9; 121:5</p> <p>commented (1) 118:10</p> <p>commenting (1) 119:21</p> <p>comments (52) 31:22;39:2;44:24; 45:9,10,20;57:3;68:8, 15,19;69:13,19,23; 71:7,13,16,20;72:9;</p>
---	---	---	--	---

74:5;94:14,19;95:22; 96:9,22,24;97:7,8,17, 18;98:9,18;99:2,3,6,7, 8;102:24;103:3,8; 104:23;105:7;108:17; 109:4,7;113:4;117:9, 13;118:7,8,11;119:22; 121:24 COMMISSION (1) 126:24 Committee (138) 6:13;8:17;10:17,18; 11:2,4,12,14,17,21,25; 12:5,6,6,7,7,8,8,9,16, 25;13:24;14:14;17:12, 17,20,22,23;20:6,12, 17,23;21:1;22:9,12; 24:3,13,17;26:1,5,15; 29:9,11,15;37:1,13,15; 39:5,16,18,20;40:20, 22,23,25;41:20,21,22, 23,24;42:1,8,14,17,18, 20;43:5,7,8,9,19,20,23; 44:6,14,25;46:23;47:7, 10;50:22,24;51:9,13; 55:22;58:21;59:11; 62:24,25;63:2,3,10,17; 65:13,14;66:5;67:5,7,9, 12,15,16,17,18,18; 68:20;76:3,7,8,14,16, 18,20,24,25;77:4,7,8, 10,11,12,12,15,16,20; 78:2,6,10;79:19;80:5, 14,21;81:6,16;91:7,9, 10,11;94:11 committeeman (6) 9:20,22,24;10:8; 68:5;118:14 committeemen (5) 10:9;42:3;105:24; 106:1;108:4 committeeperson (7) 10:15,21;13:20; 39:22;52:10;105:13; 106:11 committeepersons (4) 107:12;108:13; 109:16,20 committeeperson's (1) 13:21 committees (8) 11:21,23;12:12,15; 39:19;67:8,14;76:4 Committee's (1) 20:20 committeewomen (1) 10:10 committing (2) 66:12;94:11 common (1) 111:7 communication (1) 21:24	communications (5) 22:1;61:6,16,25;62:1 community (8) 57:17,23;76:12; 92:23;93:2,12;94:9; 105:5 Compared (3) 47:16,17;51:20 complaint (29) 6:20;33:4;38:13; 45:12;47:24;48:12,20; 50:1;56:1;57:11;69:11, 22;70:4,8;71:2,6,25; 72:3;74:25;75:11; 82:18;95:23;96:23; 97:19;98:10,19; 118:12;123:6,15 complete (2) 63:3;76:20 composed (1) 10:14 computer (1) 98:24 concerns (2) 34:2;44:23 concise (1) 63:5 concluded (1) 125:4 conclusion (2) 111:5,10 conduct (8) 38:23,23;57:10; 72:10;79:1;83:23; 107:8;112:17 conducted (1) 78:8 conferring (1) 87:8 confidential (7) 33:19;34:1,12;35:10, 13,15;37:6 confirm (1) 6:11 confusing (1) 107:3 confusion (1) 25:11 conjunction (1) 79:8 connecting (1) 124:5 connection (1) 19:6 consent (1) 5:8 consisting (1) 126:5 consultation (1) 40:20 contained (3) 27:20;126:7,8 contemplate (1)	59:20 content (5) 50:13,16,20;62:22; 72:13 contents (1) 126:6 context (2) 51:19;97:3 continuation (1) 124:17 continue (1) 74:15 convenient (1) 18:13 conversation (10) 26:14,19,21,25; 37:16,17,25;40:6,15; 120:12 conversations (5) 25:7;60:4,11,15,16 copy (1) 28:18 copy-and-paste (1) 114:5 core (1) 49:25 cornerstone (1) 113:11 correctly (1) 89:11 correspondence (4) 27:6,9;28:18;87:18 corrupt (10) 68:9,21;70:15;71:8, 14;112:4,16,16,21; 113:1 corruption (2) 112:17;113:1 cost (2) 50:2;62:8 council (1) 99:14 counsel (23) 5:8,22;21:25;33:16; 35:13;39:10;40:21; 41:5;60:4,11,15,16,18, 22;61:1,7;62:1;87:5, 12,18;91:20;102:22; 123:10 count (3) 81:18;101:15;123:24 counted (2) 80:13,16 counts (1) 80:19 County (7) 6:13;8:16;16:15; 58:20;102:17;103:2,7 couple (2) 117:20;118:1 course (1) 86:19 COURT (20)	5:1;6:7;13:3;18:8; 19:3;23:15,18;35:12; 39:25;40:11;46:14; 48:16;64:13;75:7; 87:10;93:20,22;99:16; 110:25;122:2 COVID (1) 18:12 crime (4) 66:12;73:24;94:11; 122:13 crimes (1) 68:25 criminal (35) 65:13;66:22;69:4,14, 21;70:12,20,24;71:16, 21;72:10,13;75:15,22, 25;82:20;83:2,23; 92:21;99:13;102:8,10, 18,23,24;103:3;107:6, 8;108:11,24,25;109:1; 111:25;112:17;122:21 critic (1) 46:7 criticism (1) 66:8 criticisms (2) 45:5;65:20 criticize (2) 14:7;66:4 criticized (1) 46:20 critics (1) 46:11 cross (4) 70:16;71:14,17; 73:23 crossed (4) 66:16,21;67:21; 69:24 crosses (1) 67:23 crossing (7) 66:23;68:23;69:15; 70:11,13;71:9;72:13 curious (3) 56:4;74:17;76:2 current (2) 30:13;40:9 Currently (2) 15:17;39:23	48:2,10,11,21;49:4,6, 15,25,25;71:10,11; 92:19;96:8;105:5; 109:7;117:4 damaging (1) 122:24 Dan (51) 3:10;6:21;31:22; 34:19,24;36:11,19; 40:10,12,13,14;46:5, 12,16,17,18;50:9; 51:15;57:4,11;59:5; 60:6;62:8;69:2,19; 70:22;71:20;72:9; 78:22;90:23,25;96:22; 97:7,14,18;98:9,18; 99:3,8;100:14;102:18; 103:7;107:23;109:14; 113:18;116:18;118:9, 11,18;119:22;121:19 Dan's (5) 34:19;45:4;67:20; 74:5;99:12 Darfall (1) 78:23 dark (2) 82:23;83:17 date (6) 6:9;37:18;52:14; 55:11;87:25;95:24 DATED (1) 126:11 David (2) 74:10,12 Day (6) 12:8;80:14,14;81:18; 126:11,16 days (1) 58:14 deal (1) 86:19 decide (1) 93:16 decides (1) 10:5 decision (3) 40:16,18;100:5 decision-makers (1) 41:6 declare (1) 44:5 declined (1) 119:11 decreased (9) 52:5,7,12,13,15; 56:23,24;57:3,10 Defamation (11) 54:6;56:11,19;64:6; 65:4;69:25;71:4,15,17; 74:7;84:8 defamatory (9) 31:22;32:7;33:3; 39:1;44:24;69:13;
			D	
			d'Alene (6) 3:6;8:9;28:1;58:11, 21;72:25 damage (4) 49:19,23;50:4; 104:20 damaged (3) 48:1;117:10,17 damages (16)	

<p>103:25;112:13;113:4 defamed (1) 45:19 Defendant (2) 3:1;5:15 defendants (1) 55:22 Defense (63) 14:12,13,14;15:7; 17:10,17,20;19:25; 20:21;21:12;22:7,8,25; 23:5;24:4,7,19;26:1; 27:3,11,20,24;28:6,25; 29:5,16;30:14,17,25; 31:23;32:5,9,11;36:19; 47:3,4;53:3,4,6,16,19; 62:12;84:21,24;85:2,4, 11,18,22;86:3;87:2,12; 88:4;89:13;91:1,4,5, 21;92:6,9,12,15;119:3 defenses (1) 31:13 define (3) 36:17,64:7;81:12 defined (7) 8:19;10:11;11:10; 13:10,15;67:19;76:9 definitely (1) 53:8 degree (1) 7:18 delivery (1) 81:25 demonstrate (5) 84:3,7,10;104:18; 105:3 Deponent (1) 81:23 depose (1) 126:3 deposed (3) 19:10;118:2,4 deposit (1) 15:11 deposition (27) 5:8;6:14,20,24; 18:18;19:22;32:25; 33:22,25;34:6,9,21,22; 35:14;36:16;39:5,8,11, 12;40:8;58:9;69:9; 87:15;94:5;125:4; 126:5,6 depositions (2) 18:11;86:16 describe (1) 62:1 described (1) 123:14 Desgross- (1) 55:17 Desgrosseilliers (2) 54:4;55:19 designate (1)</p>	<p>33:24 designated (3) 6:12;37:6;80:20 designations (1) 34:14 Designs (1) 23:23 desired (1) 109:21 desist (6) 59:7,14,21;60:6; 63:22;68:12 details (2) 37:24;38:7 deter (1) 38:23 Dhillon (1) 5:18 difference (1) 100:16 different (6) 26:4;32:6;39:19; 62:14;69:13;81:18 diminished (1) 57:17 Dinesh (2) 83:4,6 direct (1) 111:20 directed (2) 91:8;108:12 directly (2) 12:9;95:21 disapproval (1) 57:23 disclosed (2) 90:2;114:9 discovery (5) 31:16;87:6,7,19; 114:9 discuss (4) 26:3,15;66:20;87:25 discussed (1) 38:3 discussion (2) 32:8;43:4 discussions (2) 32:6;121:6 dismissed (2) 58:13;59:3 dispelled (1) 65:24 disprove (1) 86:5 dispute (1) 19:21 distain (1) 65:20 distributed (2) 63:19;105:23 District (9) 8:9;58:12,22;72:25; 74:18,19;82:13;100:1;</p>	<p>107:19 document (2) 25:10;67:3 documents (4) 28:14;29:23;84:16; 86:17 dog (1) 55:21 donate (9) 36:18;96:14,19,21; 97:2;100:23;101:6; 120:7;121:3 donated (4) 15:6;16:1;21:11; 30:3 donates (1) 118:25 donation (8) 30:16,25;36:16;38:9; 95:1,5;97:4;104:24 Donations (39) 15:2;16:2;18:1;21:7; 22:7;25:25,25;29:10, 11;30:4;31:13;32:24; 36:12;38:4;47:2,3,6, 14;48:3;51:20;52:2,11, 13,15,16,22;53:2; 56:23,24;57:3,9;84:25; 85:3,13;91:4;95:20; 109:5;117:16;119:4 done (16) 24:5,11;25:1,4; 27:16;35:25;48:5; 49:19;52:20;59:9; 76:20;81:2,7,12;106:3; 117:21 donor (3) 35:25;37:13,15 donors (9) 18:1;33:12,14;34:7; 35:25;36:1;85:3;91:4; 119:3 Door (1) 99:15 double (1) 109:10 down (13) 18:16;37:23;67:1; 69:14;71:19;72:2,5; 73:7;85:17;92:18;97:6, 17;98:16 downtown (1) 121:12 downward (2) 95:5,20 dozen (1) 78:14 drafted (2) 62:22;66:25 draw (2) 20:1;22:25 drawback (1) 18:14</p>	<p>drawer (1) 98:23 D'Souza (2) 83:4,6 duly (2) 6:2;126:2 Dupzyk (3) 54:3;55:16,19 D-u-p-z-y-k (1) 55:17 during (3) 10:8;14:6,24 duties (6) 12:24,24;13:8,10,13, 19</p>	<p>115:21;116:15;117:16; 119:14;121:18 email (18) 25:15,22,24;28:16, 17;29:25;113:25; 114:7,10,13,14,23; 115:7,16,18,20;116:2, 17 emails (3) 28:14;114:1,6 end (2) 83:13;116:17 endorse (6) 74:12;76:11;80:4; 92:3,7;105:19 endorsed (8) 68:10,21;77:5;82:16; 100:13;107:20;110:16, 20 endorsement (1) 75:19 endorses (1) 101:7 endorsing (7) 70:15;71:9,14;74:6; 100:16;112:3,8 engaged (10) 21:25;69:3,21;70:23, 23;71:16,21;92:21; 102:23;103:1 engagement (1) 20:13 engaging (6) 75:15;83:22;102:7; 107:7;108:11;113:1 engineering (1) 7:21 entail (1) 34:24 enter (2) 33:23;35:11 entered (1) 37:9 entire (2) 16:14;77:6 entitles (3) 15:6,10;16:1 entity (4) 26:2;29:12,16;89:21 envelope (1) 102:1 e-s-g-r-o-s-s-e-i-l-l-i-e-r-s (1) 55:21 especially (2) 19:1;33:1 estimate (1) 54:10 et (1) 13:15 even (9) 6:24;41:6;50:9; 51:15;62:18;66:4; 104:3;108:12;122:24</p>
E				
			<p>earlier (5) 61:20;66:2,11;94:5; 97:12 ease (1) 19:21 East (2) 23:14,17 economic (2) 48:1;95:20 effect (14) 5:7;38:22,24;39:1; 56:15;73:3;93:1,10,17, 23;95:10,14;97:5; 105:4 either (7) 19:5;21:24;24:2,18; 57:23;86:18;93:21 Elaine (4) 15:17,21;16:4;25:17 elect (2) 10:7,17 elected (4) 8:12;9:9;10:20; 15:23 electing (1) 9:8 election (6) 10:8;102:9;104:9,10; 124:12,20 electioneering (18) 21:8;27:18,21;29:1, 6,21;62:15;88:2;89:1, 2,4,6,14,18;90:11;92:2, 13,16 Elections (5) 62:24,25;63:2,9; 74:18 Electronics (1) 7:21 else (23) 18:7;22:23;23:2; 31:8;32:2,17;33:11; 37:14;39:15;46:18,24; 67:23;90:20;94:22; 95:2;105:2,6;114:11;</p>	

<p>evening (3) 101:21,24;102:3</p> <p>event (1) 90:16</p> <p>Events (2) 12:7;76:18</p> <p>everybody (10) 42:4;79:9,10;106:4; 110:7,9,11;114:15; 115:19,21</p> <p>everyday (1) 111:7</p> <p>everyone (2) 105:18;114:10</p> <p>evidence (15) 31:16;92:22;93:7; 94:7,12,21,21;96:8; 105:2;107:23;108:7, 16;109:6,6;117:16</p> <p>exact (5) 26:22;31:3;37:18; 38:21;122:19</p> <p>EXAMINATION (2) 6:4;122:8</p> <p>example (3) 10:2;14:6;41:16</p> <p>except (1) 126:9</p> <p>exception (1) 10:16</p> <p>excess (2) 88:10;89:19</p> <p>exchange (1) 29:25</p> <p>excluded (3) 114:10,12;115:7</p> <p>Exclusive (1) 15:3</p> <p>Excuse (5) 30:7;55:12;63:1; 81:20;108:19</p> <p>execute (1) 33:21</p> <p>execution (1) 34:2</p> <p>executive (53) 11:8,12,14,17,21; 12:25;17:12,17,19,22, 23;20:5,12;22:9,12; 24:3,13,17;26:14;37:1; 39:4,18,20;40:20,22, 23,25;41:22,23;42:13, 18;43:5,8,23;44:5,6,11; 47:7,10;59:11;66:5; 67:15,17;68:20;76:23, 25;77:2,8,10,11,12,20; 91:9</p> <p>exhibit (2) 26:11;124:2</p> <p>exist (1) 53:4</p> <p>expected (1) 52:16</p>	<p>expedition (1) 32:22</p> <p>expended (1) 50:2</p> <p>expending (1) 28:25</p> <p>expenditures (13) 22:8,11;84:25;85:4, 11,18,19,20,21,25; 86:2;87:2;88:2</p> <p>EXPIRES (1) 126:24</p> <p>explain (1) 29:17</p> <p>explained (3) 29:20;41:2;61:5</p> <p>explaining (1) 34:11</p> <p>explanation (2) 29:24;38:12</p> <p>express (1) 66:4</p> <p>expressed (1) 66:10</p> <p>extension (1) 67:16</p> <p>extent (3) 69:24;93:13;97:9</p> <p>eyes (7) 57:17,23;92:23;93:2, 11;94:9;105:5</p>	<p>73:4,10</p> <p>falsity (1) 85:9</p> <p>famillar (2) 6:19;110:23</p> <p>family (2) 34:25;38:2</p> <p>far (2) 31:13;59:17</p> <p>fast (1) 51:1</p> <p>favor (1) 42:12</p> <p>FDA (2) 88:10;89:19</p> <p>feedback (2) 94:15,20</p> <p>feel (5) 45:19;69:24;76:11; 93:8;103:24</p> <p>feeling (1) 52:2</p> <p>Feer (1) 78:22</p> <p>female (1) 121:15</p> <p>few (1) 122:6</p> <p>field (1) 31:13</p> <p>filed (12) 37:19;43:2,20;53:15; 55:12;58:12,22;59:3; 72:16;100:2;118:23,24</p> <p>files (1) 16:21</p> <p>filing (4) 48:3;52:13;59:21; 73:18</p> <p>fill (2) 10:17,18</p> <p>final (2) 106:22,24</p> <p>finally (1) 76:19</p> <p>financial (6) 31:12;32:24;94:23, 25;104:24;109:5</p> <p>find (7) 75:14;83:1;91:3; 97:21,24;102:6;111:24</p> <p>finding (1) 9:8</p> <p>finds (2) 76:14;112:13</p> <p>fine (7) 22:2;30:8;34:4; 81:22;99:18;108:20; 113:17</p> <p>fingertips (2) 36:2;54:9</p> <p>finish (2) 10:20;95:16</p>	<p>first (15) 6:2;14:22;19:14,22; 32:12;36:7,10;40:17; 41:21,23;67:3;76:13; 103:1;122:10;126:2</p> <p>firstly (1) 76:14</p> <p>fiscal (3) 64:22,23;65:1</p> <p>fiscally (6) 64:5,7,9,20,24;65:3</p> <p>fishing (1) 32:22</p> <p>fixed (1) 52:8</p> <p>flyer (5) 50:10,21;51:7,16,17</p> <p>focused (1) 69:1</p> <p>follow (3) 27:13;73:6;74:17</p> <p>following (5) 7:14;28:13;80:13; 115:11;123:18</p> <p>follows (1) 6:3</p> <p>followups (1) 122:3</p> <p>force (2) 5:7;72:8</p> <p>Ford (1) 6:8</p> <p>foregoing (1) 126:4</p> <p>forgot (1) 58:14</p> <p>form (44) 17:14;18:2;21:15; 30:23;36:13;38:16; 41:13;45:6,14,22;48:8, 14;49:7,10,16;50:6; 52:18,25;57:5;64:10; 65:18,22;68:24;70:1, 25;71:23;72:12;73:12; 75:16;83:9,9,12,19; 86:7,10;94:1;95:11; 102:11;109:18;110:8; 111:1,14;112:19; 116:25</p> <p>former (1) 25:17</p> <p>forth (5) 76:19;92:10;98:9,18; 118:11</p> <p>forward (3) 43:18;44:25;77:18</p> <p>founded (3) 53:6,8,11</p> <p>four (2) 17:8;107:17</p> <p>frame (1) 118:22</p> <p>Frank (1)</p>	<p>12:2</p> <p>Franklin-Murdock (11) 5:17,17;12:2;17:14; 18:2;21:15,20;26:7; 30:22;31:11,19;32:4, 15,19;33:16;34:8,17; 35:1,9,22;36:13;37:4, 8;38:16;41:4,13;44:1; 45:6,10,14,22;48:8,14, 18,22;49:7,10,16;50:6, 15;51:1;52:18,25;55:2; 57:5,12;59:22;60:9,19; 61:5,15,23;62:17; 64:10;65:18,22,24; 68:24;69:10;70:1,5,25; 71:23;72:12;73:12; 74:1;75:6,16;83:12; 84:12;85:7,12;86:7,10, 13,15;87:4,17,23; 93:13,18,25;95:11,15; 102:11,21;109:18; 110:2,8,18;111:1,4,9, 14,17;112:10,19;113:8, 12,16;114:22;115:1, 23;116:6,25;122:6,9; 123:10,13;124:22,25</p> <p>fraud (14) 108:14,23,24,25,25; 111:11;112:1;122:13, 17,20,21,24,25;124:21</p> <p>fraudulent (1) 124:20</p> <p>freight (1) 81:25</p> <p>friends (1) 38:2</p> <p>front (1) 123:6</p> <p>full (4) 6:6;35:24;76:20; 78:18</p> <p>function (3) 8:18,19;42:1</p> <p>Fund (67) 14:12,13;15:7;17:11, 17,20;19:25;20:21; 21:12;22:7,8,13,14,25; 23:5;24:4,7,19;26:1; 27:3,12,20,24;28:6,25; 29:5,16;30:14,17,25; 31:23;32:5,9,11;36:19; 38:4;47:3,4;53:3,4,6, 16,19;62:12,16;65:20; 84:21,24;85:3,4,11,18, 22;86:3;87:2,12;88:4; 89:13;91:1,5,6,21;92:6, 9,13,16;119:3</p> <p>funded (2) 15:1;30:13</p> <p>funds (12) 18:5;20:1,15;21:7; 27:17,20;29:5,20; 30:11;85:1;88:10;</p>
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89:19 further (5) 5:5;26:3,16;121:22; 124:24 future (1) 38:23	guesses (1) 18:21 guidance (3) 27:12,13,14 guys (5) 56:19;79:12,13;96:2; 105:17	32:20;33:8;35:17 hard (1) 49:25 Hartman (4) 82:10;107:19; 110:16,20 hashtag (2) 82:24;83:17 Hayden (1) 17:1 Hazel (4) 72:21;73:18;97:12; 117:2 H-a-z-e-l (1) 72:22 head (5) 17:3;96:12;98:14; 120:11,21 hear (1) 93:21 Hedden (3) 78:22;80:17,25 held (5) 8:4;9:17;88:25;92:1; 98:3 help (12) 12:18,23;20:11,11; 38:9;80:1;89:12;92:3, 7;95:5;105:15;121:16 helpful (1) 28:22 helping (1) 9:9 helps (1) 52:14 here's (2) 24:5,6 hereto (1) 126:10 hey (2) 77:18;93:20 high (3) 6:25;7:2,7 higher (1) 7:24 highly (1) 122:24 Highway (2) 82:13;107:19 hit (1) 66:14 Hmm (1) 59:4 Hold (3) 17:13;21:20;121:24 holds (1) 88:12 home (8) 80:6,9;81:17;101:14, 18,23;102:1;123:23 hour (3) 19:1;54:24;96:1 hours (1)	107:17 house (3) 44:17;81:25;82:1 hurts (1) 94:11 husband (2) 90:22;91:19 hyperbole (2) 84:1;104:15 hypocrisy (2) 113:10,11 hypothetically (3) 115:8,22;116:4	individual (7) 22:7;37:1;68:1; 72:21;77:5;82:9; 110:15 individually (2) 56:8;79:3 individuals (5) 11:18;76:11;78:25; 96:11,13 inferring (3) 107:9;108:14,22 infers (1) 108:22 information (15) 16:6;24:20;27:1,4,5; 32:24;47:23,24;54:9, 13;85:8;86:12,14; 87:16,22 ing (1) 97:25 initiated (1) 15:20 in-person (1) 5:7 inquired (1) 27:10 inquiring (2) 28:24;29:4 instance (1) 63:22 institutes (1) 7:24 institution (1) 88:12 instruction (5) 61:15,23,24;93:3,6 insurance (1) 88:10 insured (1) 89:19 intent (1) 109:17 intention (1) 109:14 intentionally (3) 109:14,15,19 interested (2) 38:8;85:14 interests (1) 35:19 interface (1) 13:22 interfered (1) 116:7 interpret (1) 111:15 interpretation (1) 33:3 interrogatory (1) 95:14 interruption (1) 99:15 interview (8)
G	H	I		
Gala (1) 119:11 gave (1) 27:5 general (10) 12:9;24:6;36:22,25; 37:24;42:2;54:15,16; 57:21;62:16 Generally (5) 38:1;96:17,18; 122:12,15 gets (1) 60:1 given (6) 21:21;33:1;85:19; 93:3,6;98:3 goal (1) 9:7 goals (2) 14:1;76:12 goes (10) 26:2;29:16;77:3,19; 81:10,12;82:22;88:23; 112:1;122:3 Good (3) 6:6;33:23;95:25 Gookin (41) 3:10;6:21;31:22; 34:9;36:20;38:15;40:8; 41:2;57:4,11;59:5; 60:6;61:10,18;65:12, 21;69:19;70:22;82:19; 90:23,25;96:22,24,25; 97:7,15,18;98:9,18; 99:4,8;100:4;102:18, 23,23;103:7;113:9; 118:9,11;119:22; 123:18 Gookin's (2) 50:10;51:15 GOP (1) 12:22 graduate (2) 7:4,6 great (1) 18:22 Group (1) 5:18 Gucnette (2) 39:24;40:2 G-u-e-n-e-t-t-e (1) 40:3 guess (2) 71:12;102:25	hairs (1) 32:12 half (1) 96:1 Haman (143) 3:3,4,5;15:15;6:5; 12:11;13:7;17:16;18:5, 10;21:17;22:5;23:20; 26:10,13;30:24;31:15, 21;32:2,10,17;33:6,13; 34:4,15,19;35:5;36:3, 15;37:7,10,11;38:18; 40:4,13;41:9,15;44:5; 45:8,11,16,23;46:17; 48:9,21,24;49:1,14,21; 50:9,18,20;51:5,7; 52:22;53:2;54:23;55:3, 7;57:8,15;59:24;60:3, 13,22;61:8,18;62:6,22; 64:11,15;65:19;66:1; 69:1,12;70:3,6;71:3; 72:1,15;73:14;74:4,5; 75:10,21;82:2,6,9; 83:15;84:14,16;85:10, 17;86:8,11,22,25; 87:13,20;88:1;93:21; 94:4;95:13,18,19;96:6, 7;99:18,19;102:13,25; 109:19;110:6,10,19; 111:2,7,12,15,19,24; 112:12,20;113:10,14, 18;114:24;115:5,6,25; 116:3,10;117:1,20,25; 118:1;121:22;123:11, 12,12,14;124:24;125:2 Hamen (1) 123:11 handled (1) 87:6 hands (3) 19:3;21:3;99:1 Hang (1) 12:1 happen (1) 91:8 happened (4) 64:3;104:7;107:5; 114:5 happening (2) 106:5;107:15 happy (1) 72:7 harassing (3)	Idaho (6) 3:6;12:22;25:15; 70:8;74:22;84:8 idea (4) 54:16;106:9;112:13; 114:4 identified (3) 15:25;33:4;79:1 identify (2) 71:12;95:20 identity (1) 15:10 imagine (1) 95:12 immediately (1) 81:7 impact (2) 49:15;93:10 implement (1) 9:3 implicating (1) 73:10 implies (1) 117:11 implying (2) 108:22,23 improved (2) 57:16,22 inappropriate (1) 32:25 Inaudible (2) 48:15;93:19 include (4) 12:25;14:15;15:9; 80:23 included (1) 113:25 includes (1) 11:14 including (4) 17:22;33:25;34:25; 84:20 increased (8) 47:14;48:3;51:20; 52:3,7,23;53:3;57:9 indicate (3) 5:11,14;124:6		

77:17,23;79:2,3,5,6, 8;80:1 interviewed (1) 76:15 interviews (4) 77:15;78:9;79:1,16 intimate (1) 74:23 into (4) 33:24;35:11;37:9; 60:1 introduced (1) 76:18 investigate (3) 102:17;103:3,7 invoices (2) 22:20,21 involved (1) 77:8 issue (6) 26:16;29:9;64:22,24; 65:1;75:11	61:9;62:8,11,16;63:21; 65:3,19;66:11,23; 67:20;68:20;69:3,20; 70:14,23;72:11;73:4,8, 8,10,17,23;74:5,12; 76:12;79:23;82:16,24; 83:2,22;88:1;89:1; 92:20,23;93:2,9,11; 94:6,8,13;95:21;96:14; 97:6,7,18;98:8,17,17; 99:7;100:6,13,23; 101:6,14;102:7; 103:12,21,23;104:20; 105:4,6;107:7;108:11; 109:7,11,15;110:4; 112:3,16,21,22,25; 117:10,17;118:4,10,25; 119:5,18,21,25;120:3, 7;121:7;123:23;124:19 keep (6) 15:5;16:10,21;17:25; 33:17;44:16 kept (5) 14:10;16:8;23:9; 44:13;79:15 kind (3) 32:5;93:17,23 knowing (3) 57:9,21;58:2 knowingly (1) 73:9 knowledge (7) 9:2;27:20;29:3; 35:22;56:6;74:24; 118:5 knows (1) 87:5 Kootenai (7) 6:13;8:16;55:22; 58:20;102:17;103:2,7	laws (1) 84:8 lawsuit (35) 30:13,18,25;31:14; 32:22;34:23;38:3,5,7, 15;40:19;41:5;45:1; 47:24;48:4;50:19; 52:13;53:15;55:11,24; 56:9,25;58:24;64:9; 65:17;66:20;69:25; 70:21;95:10;96:15; 113:6,9;118:8,10; 119:22 lawsuits (1) 57:24 lawsuit's (1) 32:23 lead (1) 31:16 learned (2) 104:8,9 learning (2) 7:25;10:13 least (3) 17:8;59:10;63:23 left (1) 96:1 Legal (75) 14:12,13,14,14;15:6; 17:10,17,20;19:25; 20:21;21:11,25;22:6,8, 13,14,25;23:5;24:4,7, 19;26:1;27:3,11,20,24; 28:6,25;29:5,16;30:14, 17,25;31:23;32:5,8,11; 36:18;38:4;41:5;47:2, 4;49:2;53:2,4,6,16,19; 60:20;62:12;84:21,24; 85:2,2,4,11,18,22;86:3; 87:2,11,12;88:4;89:13; 90:25;91:4,5;92:6,9,12, 14,15;111:5,10;119:3 Legislative (1) 12:7 less (2) 31:4,6 Lesson (3) 104:8,8,8 letter (8) 29:8;37:2;59:7,14, 21;60:6;63:22;68:12 level (4) 69:25;98:11;99:9; 109:1 liar (3) 68:9;70:14;71:13 liars (5) 68:21;71:8;73:23; 112:4,16 library (1) 56:7 light (1) 98:8	likely (1) 59:14 likewise (3) 88:25;91:12,23 limits (3) 66:7,10,12 Lincoln (1) 12:8 line (24) 34:5;66:16,21,21,23; 67:21,23;68:23;69:15, 24;70:12,13,16;71:9, 15,17;72:14;73:23; 87:15;95:16,16,21; 122:20;124:5 lines (1) 28:22 link (1) 109:23 list (7) 35:24;36:2;63:4,5; 78:18;101:8;114:5 listed (1) 126:9 listener (1) 108:22 litigation (1) 53:20 little (9) 6:23;8:20;11:11; 18:14,16;25:11;60:14; 82:7;92:18 live (1) 74:18 loaned (1) 82:20 local (1) 5:22 located (1) 16:25 location (3) 16:21;58:25;121:15 lodge (1) 51:2 lodging (1) 94:1 long (3) 8:10;27:17;82:8 longer (1) 121:3 look (23) 28:16,21;43:1;51:17; 53:7,12,13;54:8,22; 55:1,9;83:10;91:5; 94:24;95:4;97:6,25; 98:16,17;106:4; 110:21;114:25;117:21 looked (3) 59:2;97:17;98:8 looking (4) 12:17;38:4;48:1; 75:10 losses (1)	95:21 lost (2) 76:5;82:1 lot (4) 64:8,12,12;112:2 lots (1) 46:11 lunch (1) 95:17
J				M
Jahnene (1) 115:2 Janice (2) 54:3;55:15 Jeff (2) 58:19;78:12 Jesse (2) 5:17;93:24 Jesus (1) 56:18 judge (2) 49:5;72:7 Judith (1) 55:15 June (1) 47:15 jury (2) 49:5;93:6				ma'am (1) 125:3 mailer (4) 61:19;62:8,10,23 maintain (2) 23:4;35:2 maintained (1) 33:19 maintains (1) 88:1 makes (2) 35:13;77:17 making (5) 31:12;38:9;83:14; 104:6;111:20 man (1) 121:9 manages (1) 17:10 managing (1) 82:5 mandated (1) 24:23 manifest (1) 117:19 Mann (6) 68:1;97:13;112:20, 25;113:2;117:1 M-a-n-n (1) 68:2 manner (2) 5:9;103:7 many (9) 19:12;54:19;63:8,11; 78:13;105:12;106:13; 108:3;123:15 Marjorie (2) 54:3;55:17 mark (9) 34:5,20;82:21;104:3, 10,11,11,12;105:19 marked (1) 124:1 market (14) 88:8,19;89:4,8,18,20, 25;90:6,12,17;91:13, 24;92:1,10 Mary (3) 73:20,22;117:2 Mateo (1) 7:17
K	L			
KCC (1) 14:22 KCR- (1) 9:13 KCRCC (146) 6:17,21;8:15;9:6,15; 10:3,14;11:2,12,24; 14:1,19,22;16:13,17, 23;19:23;20:25;21:7, 25;36:25;38:3;39:2; 40:18;41:2,7;45:1,3,5, 18,19;46:17,20;47:3, 25;48:2,10,23;49:3,12, 24,24;50:17,19;52:1,1, 8;53:25;55:25;56:11, 15,20,25;57:16,18; 58:9;59:6,12,14,24;	laid (1) 38:12 language (1) 51:3 last (15) 17:8;26:24;27:21; 28:3;51:20;52:3;56:23; 77:6;93:23;100:1; 101:13;109:9,11; 119:9;123:22 late (4) 80:5;81:9,10,12 later (7) 59:3;82:16;87:15,25; 107:20;110:16,20 laundry (3) 82:25;83:14,18 Law (6) 3:3;5:18;8:19;10:11; 26:4;70:8			

<p>materials (1) 56:6</p> <p>matter (15) 14:17,20;27:1,2; 40:8;41:19;42:13; 44:23;53:21,22;59:6; 63:24;64:1,23;96:25</p> <p>maximum (2) 88:11;89:19</p> <p>May (8) 15:21;28:21;55:12, 12,12;56:14;81:1; 126:9</p> <p>maybe (9) 12:23;25:10;39:16; 58:14;75:1,3;79:5; 95:16;96:1</p> <p>McCrea (9) 53:23,24;55:11,15; 57:18;95:10;113:5; 118:2;121:6</p> <p>McQuade (5) 25:14;26:20;28:10, 13;29:17</p> <p>mean (17) 15:13;32:12;34:18; 48:9;49:18;50:16,17; 70:5;75:19;78:19;82:7; 93:15;94:21;100:11; 105:17;108:25;113:13</p> <p>meaning (1) 15:19</p> <p>means (1) 34:11</p> <p>media (21) 73:3;97:20,23;98:15; 99:2,5;101:21;106:7, 25;107:10,14,24;108:6, 8;113:24;115:14,17; 117:14;119:17,24; 124:10</p> <p>meet (2) 16:13;28:9</p> <p>meet-and-confer (1) 86:19</p> <p>meeting (16) 13:9;26:14;28:13; 41:10,15;43:22;76:21; 77:2;78:2,6,6;80:5,14; 81:8,10;87:8</p> <p>meetings (3) 14:4,10;16:13</p> <p>Melanie (1) 78:22</p> <p>member (26) 9:13,14,23;10:3,5, 15;11:2,3;12:16;19:23; 24:15;51:13;63:17; 65:3;66:3;67:6,8,21; 69:20;70:23;72:11; 73:17;74:2;79:21; 118:15,16</p> <p>members (25) 10:10;13:13,23;14:7; 34:25;39:17,18,21; 42:7;43:5;54:1,2;64:5; 66:11;69:20;70:14,22; 71:8;72:10;77:11; 78:24;79:25;109:11; 119:18,21</p> <p>membership (5) 10:14;16:14;52:7,8; 63:4</p> <p>mention (2) 39:13;50:9</p> <p>mentioned (4) 11:24;39:12;40:8; 96:9</p> <p>met (2) 44:6;57:22</p> <p>Meyer (7) 53:23,24;55:11,15; 56:25;57:18;95:10</p> <p>Meyers (1) 113:5</p> <p>MICHAEL (1) 3:4</p> <p>might (12) 25:11;79:7,8,13; 105:9,9,10;113:3; 117:15;122:1,2,3</p> <p>Milke (3) 5:15;95:15;113:8</p> <p>military (1) 8:2</p> <p>Millard (4) 27:7,11;28:19;30:1</p> <p>mince (1) 51:5</p> <p>mind (1) 30:21</p> <p>minds (3) 57:25;58:3,5</p> <p>minimums (1) 88:11</p> <p>minutes (15) 14:10;25:6;41:10,14, 18;42:22;43:22;44:4, 13,19,20;54:25;75:2; 79:15;117:20</p> <p>mischaracterizes (1) 48:19</p> <p>misconduct (2) 75:22,23</p> <p>mislead (1) 58:7</p> <p>mission (1) 8:25</p> <p>mixing (1) 32:6</p> <p>mlhamanlaw@gmailcom (1) 3:8</p> <p>Mm-hmm (1) 25:18</p> <p>moment (5) 66:18;75:5;81:20;</p>	<p>109:10;119:16</p> <p>mom's (1) 81:25</p> <p>money (42) 28:25;49:25;64:8; 73:8;82:21,22,23; 83:16,17,17;85:15,24; 88:8,19,22,23;89:4,8, 18,20,25;90:5,6,10,11, 17;91:12,24;92:1,1,5,5, 9,10,12,15;100:23; 101:6;118:25;120:7,7; 121:3</p> <p>month (3) 26:23;54:16;119:9</p> <p>Monthly (2) 24:9;25:1</p> <p>months (6) 8:11;26:24;28:10; 54:19;114:20;119:9</p> <p>more (12) 8:21;29:7;31:4,5,6; 52:12;59:14;61:24; 64:12;72:7;98:6;118:1</p> <p>morning (4) 6:6;101:16;102:4; 104:8</p> <p>mornings (1) 19:2</p> <p>motion (3) 91:7,15,23</p> <p>move (1) 34:7</p> <p>moved (2) 90:5,10</p> <p>much (5) 24:5;31:2;54:19,19; 101:3</p> <p>multiple (2) 48:15;93:19</p> <p>Murdock (1) 35:7</p> <p>mute (1) 81:20</p> <p>muted (1) 81:23</p> <p>myself (5) 18:9;19:21;22:22; 23:1;90:19</p>	<p>names (10) 15:25;18:1;33:13; 34:7;36:3;78:17,20; 85:3;96:10;98:12</p> <p>narrow (4) 71:19;72:1;85:17; 92:18</p> <p>narrowed (1) 69:13</p> <p>narrowing (1) 72:5</p> <p>nationalist (1) 74:7</p> <p>nationalists (4) 68:10,22;70:15; 112:3</p> <p>nature (8) 18:11;21:22;26:25; 27:8;28:17;31:23;54:5; 55:24</p> <p>necessarily (3) 53:1;74:2;104:13</p> <p>necessary (3) 87:8,9,25</p> <p>need (8) 18:23;19:2;43:1; 75:3,3;82:2;87:1; 114:17</p> <p>needs (1) 19:3</p> <p>negative (6) 84:5;93:1,10;98:8; 99:7;105:4</p> <p>negatively (5) 92:24;94:8,13;95:7; 98:17</p> <p>neighbor (1) 19:21</p> <p>Neither (1) 40:6</p> <p>new (1) 81:25</p> <p>newspaper (1) 115:18</p> <p>next (3) 10:20;81:18;102:4</p> <p>nice (1) 33:10</p> <p>night (2) 101:13;123:22</p> <p>night's (1) 109:11</p> <p>Nina (2) 80:16,25</p> <p>Nobody (4) 5:23;46:18,24; 103:14</p> <p>nominated (1) 80:21</p> <p>None (3) 11:22;68:25;85:23</p> <p>nonlawyer (1) 122:19</p>	<p>nonofficial (1) 124:10</p> <p>non-privileged (1) 62:2</p> <p>Normally (1) 63:13</p> <p>North (2) 3:5;74:21</p> <p>NOTARY (2) 126:20,22</p> <p>note (3) 69:10;85:7;87:17</p> <p>notes (2) 105:25;117:22</p> <p>November (4) 58:11,12,13,22</p> <p>number (2) 8:6;36:1</p> <p>numbers (2) 51:22,24</p>
O			
<p>Object (40) 17:14;18:2;21:15; 31:11;36:13;38:16; 41:13;45:6,14,22;48:8, 14;49:7,16;50:6;52:18, 25;57:5;64:10;65:18, 22;68:24;70:1,25; 71:23;72:12;73:12; 75:16;83:12;86:7,10; 87:4;95:11;102:11; 109:18;110:8,25; 111:14;112:19;116:25</p> <p>objected (4) 30:22;49:10;56:5,5</p> <p>objecting (1) 35:16</p> <p>objection (19) 17:13;32:20;35:2,3; 44:1;48:17,18;51:2; 57:12;93:13,18;94:1; 110:2,18;111:4,17; 112:10;115:23;116:6</p> <p>objections (1) 5:9</p> <p>obligated (1) 24:20</p> <p>observing (1) 34:16</p> <p>obviously (2) 89:7;118:23</p> <p>occasion (3) 80:3;81:8,15</p> <p>occasions (1) 101:11</p> <p>occured (3) 59:17;80:7;124:21</p> <p>occurring (3) 35:8;38:8,11</p> <p>October (10) 25:14;42:25;47:15,</p>			

<p>17,17;52:15;53:8,15, 17,17 off (17) 17:3;34:10;55:5; 75:5,8;96:3,4,7,12; 98:14;115:2,3;117:23; 120:11,21;121:23; 125:2 offer (1) 33:1 Office (14) 3:3;8:4;9:9;16:17,19, 24;21;24;27:6;28:24; 29:9;60:21;74:21; 102:14,15 official (27) 28:2;59:25;60:5; 61:9;62:7;63:15;64:4; 66:3;68:19;69:3;75:15; 80:11;81:17;83:2,22; 92:20;93:10;102:7; 105:14,16;106:21,22; 107:7,10,11;108:5; 112:23 officially (1) 102:3 omit (2) 82:16;107:19 omits (1) 110:15 omitted (1) 110:20 one (37) 20:22;21:21;33:3; 34:11;42:7;58:10;59:2; 60:18,23;64:5;66:10, 12,17;67:2,25;69:14; 74:2,13;79:9,10;98:6; 103:1,1;104:21,22; 109:9,12;110:7; 111:15;114:2,12,14; 115:19;117:6;118:18; 120:13;124:9 one-page (1) 67:3 one's (6) 5:16,18,20,23;70:20; 89:14 onion (1) 31:25 only (14) 8:12;17:4;39:12; 46:12,17,18;52:19; 58:13;66:15;67:21; 69:14;71:4;72:15; 114:12 open (2) 41:15;77:23 opened (1) 53:14 opinion (11) 64:25;66:23;67:20; 83:25;104:14;111:3,</p>	<p>12,16,22;112:4,6 opinions (1) 66:4 opponent (4) 82:20;99:11,13,14 opportunity (1) 55:9 oppose (1) 14:8 opposed (3) 45:5;102:3;104:2 opposition (1) 73:1 oral (2) 22:16;25:5 order (12) 33:17,21,24;34:13, 21;35:12,13,15,18; 36:19;37:9;125:3 organization (1) 122:25 originally (1) 99:25 originated (1) 85:15 others (2) 46:20;78:17 otherwise (2) 9:6;29:6 out (15) 36:18;38:9,12;51:8; 56:1;62:15;81:18; 88:23;91:3;97:8;99:16; 105:9;109:10;115:16, 19 outcome (1) 43:13 outline (1) 76:13 outlined (4) 37:2;45:12;71:6,25 Outreach (3) 67:4,6,9 outside (9) 34:23;39:10;49:14, 18,22;60:22;91:15,18, 20 over (7) 18:15;20:19;86:11; 102:13,15;106:4;117:5 overlap (1) 18:12 oversee (1) 81:2 overseeing (1) 12:25 oversees (2) 17:10,17 Oversight (3) 13:1,5;17:20 own (10) 16:17,17;34:25; 60:23;64:5;105:13;</p>	<p>106:14;107:13;108:4; 120:1 P PAC (1) 8:22 page (2) 72:20;102:22 pages (3) 119:24,25;126:5 paid (3) 22:20;62:10;73:8 paperwork (1) 30:10 par (1) 49:25 Parade (1) 12:7 paragraph (17) 66:21;75:10,12; 82:18;85:9;93:8;95:22; 99:11;101:13;105:12; 107:3;109:7,9,13,17; 110:1;117:10 part (8) 9:10,12;15:11;34:20; 76:9;77:10,11;79:18 partake (2) 80:24,25 participating (1) 5:2 particular (3) 10:7;17:19;117:6 particulars (1) 110:24 parties (2) 5:8;32:23 party (4) 6:25;8:20;9:3;32:23 party's (1) 35:19 past (1) 101:10 patient (1) 33:9 pay (4) 20:15;61:18;62:8; 87:12 paying (1) 73:10 payment (2) 20:13,14 PC (3) 3:3;108:12;109:11 PCs (3) 106:13;108:3;123:15 pedaled (1) 73:9 pedaling (1) 73:4 peel (1) 32:1</p>	<p>pending (3) 33:19;56:13,14 pends (1) 33:7 people (33) 10:12,17;15:5;16:1; 19:2;31:12;54:25; 56:18;63:8,11,13; 76:10;77:18;78:13,19; 79:25;80:20,20;94:14, 15,20;96:10;97:16,17; 98:7,13;99:6;101:7; 104:23;109:4;117:14; 118:8;119:20 per- (1) 20:4 perfectly (1) 18:21 perhaps (2) 25:11;34:9 period (4) 33:20;53:3,5;63:4 periods (1) 48:6 permission (1) 20:5 perpetuity (1) 85:24 person (17) 17:19;18:13;22:11; 24:17;28:9;40:9;44:20; 73:9;77:16;83:8;99:20; 120:17,18,20;121:2,5, 16 personal (5) 65:15,20;116:18,20; 119:24 personally (15) 9:14,17;23:4;36:21, 23;37:11;45:2,9,9,13, 24;46:8;100:10,11; 101:1 persons (2) 15:10;105:13 phone (1) 29:18 physical (1) 99:1 physically (1) 5:3 picture (1) 106:6 ██████████ 36:6;37:6,12;38:25; 39:7;118:18;119:14; 121:19 ██████████ 36:10,14 pinpoint (2) 104:19,21 place (3) 34:13;44:17;121:17 plaintiff (8)</p>	<p>5:18,23;6:12;8:15; 14:23;18:19;55:15; 58:9 platform (1) 9:4 Please (8) 5:11,14;6:6,9;29:2; 62:5;84:9;115:15 pm (11) 55:5,6;75:8,9;96:4,5; 115:3,4;117:23,24; 125:4 point (3) 11:1;38:3;81:1 policy (1) 9:4 polling (1) 58:25 political (1) 19:16 portion (5) 34:6,22;35:14;75:12; 82:23 portions (1) 33:25 portraying (1) 107:4 position (6) 6:17;8:10,12,13; 101:18,20 positions (2) 9:17;10:18 possess (2) 98:20,24 possession (1) 98:15 Post (10) 16:19;74:19;106:6; 120:18;123:15,18,22; 124:6,7,9 posted (13) 12:20,21,22;73:3; 82:19;101:21;107:13; 113:23;115:14,17; 123:18;124:10,11 posting (3) 99:7;108:7;114:14 posts (14) 73:8;98:15;105:7,8; 117:15;119:17,18,20, 25;120:1,5,10;124:2,5 potential (2) 49:15;76:14 power (1) 82:22 practice (1) 101:12 precinct (24) 9:20,22,24;10:7,8,9, 10,15,21,23;13:19,21, 23;24:15;42:2;52:9; 68:5;105:12,24;106:1, 11;108:3,12;118:13</p>
---	---	---	--	---

<p>precise (1) 61:24</p> <p>prefer (1) 54:11</p> <p>preparation (3) 39:5,7,11</p> <p>prepared (1) 63:14</p> <p>prescribed (1) 24:25</p> <p>Present (8) 3:2,10;5:3,13;9:19; 34:15;52:15;75:4</p> <p>press (2) 66:19,25</p> <p>Presumably (1) 44:22</p> <p>presume (1) 42:12</p> <p>pretty (3) 19:8;45:12;48:2</p> <p>Price (5) 15:17,21;25:16,17, 21</p> <p>primary (1) 10:8</p> <p>printed (1) 63:18</p> <p>printer (1) 50:10</p> <p>printing (1) 61:19</p> <p>prior (7) 15:21;27:5,8;43:2; 51:21;59:2,5</p> <p>priority (1) 94:10</p> <p>prison (3) 83:4,6,7</p> <p>privacy (3) 31:12;35:3,19</p> <p>private (4) 32:24;77:24,25;78:3</p> <p>privilege (1) 60:2</p> <p>privileged (2) 60:21;61:16</p> <p>probably (4) 13:1,5;19:15;101:4</p> <p>problem (3) 101:13;116:18; 123:22</p> <p>proceed (2) 42:15,16</p> <p>proceeding (3) 5:2,3,4</p> <p>process (13) 9:11;76:9,10;77:17, 19,23;79:5;80:1;91:15; 108:15,23;110:23; 112:1</p> <p>proclaimed (3) 101:15;102:3;104:7</p>	<p>produced (1) 86:21</p> <p>production (2) 86:18;87:5</p> <p>professional (1) 33:9</p> <p>promoting (1) 9:8</p> <p>promulgated (2) 68:7;113:5</p> <p>pronounced (1) 123:11</p> <p>proof (1) 33:1</p> <p>proper (1) 34:14</p> <p>proposals (2) 13:25;14:3</p> <p>proposed (1) 14:7</p> <p>propounded (1) 126:7</p> <p>prosecute (1) 36:19</p> <p>prosecuted (2) 14:19;58:10</p> <p>prosecuting (4) 14:15;102:17;103:2, 6</p> <p>prosecutor's (2) 102:14,15</p> <p>protective (8) 33:17,21,24;34:13, 21;35:12,18;37:9</p> <p>prove (2) 84:5;86:5</p> <p>provide (7) 14:13;24:20;25:3; 85:21;86:2,23;87:1</p> <p>provided (5) 27:12;60:21;82:23; 83:17;84:23</p> <p>provides (1) 25:3</p> <p>PST (11) 55:5,6;75:8,9;96:4,5; 115:3,4;117:23,24; 125:4</p> <p>public (9) 8:4;9:4;14:3;21:2; 89:21;91:17;120:14; 126:20,22</p> <p>publicly-elected (1) 8:13</p> <p>published (2) 68:8;73:2</p> <p>pull (2) 55:14;114:23</p> <p>pulling (1) 124:1</p> <p>pulse (1) 52:1</p> <p>punish (3)</p>	<p>38:15,17,19</p> <p>purpose (6) 8:24;14:12;20:24; 29:10;38:14;87:11</p> <p>purposes (2) 30:17;124:2</p> <p>put (5) 101:25;105:18; 106:24;112:15;115:17</p> <p>puts (1) 104:3</p>	<p>Q</p> <p>quantification (1) 57:20</p> <p>quantify (1) 57:13</p> <p>quantifying (1) 57:16</p> <p>quantitatively (1) 52:21</p> <p>question's (1) 8:20</p> <p>quick (1) 96:3</p> <p>quickly (1) 93:25</p> <p>quite (3) 13:18;35:8;69:9</p>	<p>R</p> <p>race (1) 100:13</p> <p>raised (1) 103:10</p> <p>ran (2) 68:5;72:25</p> <p>range (1) 101:5</p> <p>rated (5) 82:19;99:13;101:14; 123:23;124:19</p> <p>rating (22) 9:10;12:6;13:15; 67:11;76:3,6,8,16,19; 77:15,19;78:4,5,7; 79:18;82:15;107:18; 110:5,13;111:21; 115:9;117:11</p> <p>rating's (1) 76:24</p> <p>reaction (2) 50:8;53:20</p> <p>read (8) 57:25;58:3,5;104:11, 16;120:6;124:25;126:6</p> <p>real (1) 96:3</p> <p>really (6) 49:17;51:1;56:20; 70:5;74:17;93:25</p>	<p>reason (10) 18:24;57:7;66:15,16; 71:3,5,20,24;72:15; 82:3</p> <p>reasonable (2) 84:11,18</p> <p>reasonably (1) 31:15</p> <p>reasons (1) 41:3</p> <p>recall (20) 26:22;27:14;31:3; 36:4,5;37:18,24;38:6, 21;39:3;50:12;63:3,24; 64:2;73:16;96:20; 98:11,12;120:12; 123:13</p> <p>receive (2) 7:18;116:4</p> <p>received (4) 20:16;96:9;115:12; 116:2</p> <p>receiving (1) 116:8</p> <p>recently (2) 119:8;120:23</p> <p>recollection (1) 42:8</p> <p>recommend (3) 73:17;100:18,22</p> <p>recommended (2) 100:15,18</p> <p>recommending (1) 100:17</p> <p>recommends (1) 101:7</p> <p>record (37) 5:12;6:16;8:16;16:8; 26:7,9,12;31:20;34:10; 37:5;48:23;55:5,6,8; 59:1;61:24;62:18;74:1; 75:5,8,9;87:18;91:17; 94:2;96:3,4,5,6,7; 115:2,3,4,5;117:23,24, 25;125:2</p> <p>records (22) 15:5,8,9,25;16:11; 21:1;23:4,7,9;25:6; 54:21;55:1;79:15; 84:19,20,24;86:2;91:5, 16,20,21,24</p> <p>record's (1) 87:24</p> <p>recruited (1) 79:4</p> <p>Recruitment (4) 12:5;13:14;76:14; 77:14</p> <p>redact (1) 68:14</p> <p>redaction (1) 61:10</p> <p>re-depose (1)</p>	<p>87:21</p> <p>redistricting (1) 10:24</p> <p>refer (2) 41:18;106:14</p> <p>referenced (3) 96:23;97:19;119:18</p> <p>referred (3) 31:24,24;122:16</p> <p>referring (6) 9:6;25:16;99:12; 106:10,18;114:14</p> <p>Regan (16) 5:20;6:1,8,11;23:23; 35:6;46:14;50:16;51:4; 55:23;69:16;94:2; 122:7;124:22;126:2,14</p> <p>regard (12) 22:6;24:3,19;34:5; 38:5,10;39:1;66:19; 99:3,3;105:8;108:16</p> <p>regarding (8) 19:20;30:10;37:5; 68:19,21;69:19;71:16; 87:19</p> <p>regardless (1) 63:14</p> <p>regards (1) 25:7</p> <p>Regina (1) 55:15</p> <p>regular (2) 24:8,10</p> <p>Reilly (3) 74:10,12,18</p> <p>related (5) 32:21;95:21;97:14; 99:7;116:8</p> <p>relating (2) 6:2;21:23</p> <p>relationship (1) 20:20</p> <p>relayed (1) 41:6</p> <p>release (2) 66:19,25</p> <p>relevance (5) 31:12,19;32:20;35:2, 17</p> <p>relevant (4) 33:2;113:9,10,12</p> <p>rely (4) 85:11;86:8,9;104:23</p> <p>remember (7) 96:10,16;117:14; 120:9,20;123:9,20</p> <p>remembering (1) 121:14</p> <p>remind (1) 21:22</p> <p>reminder (1) 41:4</p> <p>Remington (1)</p>
---	---	--	---	---	---	---

79:18 remotely (6) 3:2,10;5:4,6;6:3;82:5 renew (1) 32:19 reorganized (1) 15:22 repetition (1) 57:22 rephrase (1) 19:7 reply (3) 123:18;124:6,11 report (11) 11:21;12:9;21:4; 22:11,15,16;24:8,10, 18;25:4;26:5 reportable (1) 90:16 reported (15) 21:8,12;47:6,8,9,12; 88:20,23;89:7,8,21,22, 23,24;90:12 REPORTER (18) 5:1;6:7;13:3;18:8; 19:3;23:15,18;39:25; 40:11;46:14;48:16; 64:13;75:7;93:20,22; 99:16;110:25;122:2 reporting (4) 5:4,10;24:3;27:17 reports (2) 22:7;25:5 represent (1) 114:10 Republican (7) 6:13;8:17;9:3;13:23; 55:22;58:20;119:11 reputation (14) 49:13,15,20,24; 52:23;56:15;57:16; 93:1,11;94:6,8,11,13; 95:6 Reputational (2) 48:25;51:19 request (7) 24:18,21;30:12; 44:25;46:24;61:10; 86:18 requested (1) 125:5 requests (1) 87:7 required (3) 21:16,18;49:6 requirements (1) 27:17 requires (1) 26:5 reserve (1) 87:14 reservoir (1) 90:9	residence (1) 23:5 RESIDING (1) 126:23 resolution (3) 14:7,8;87:9 responded (3) 25:21;28:15,20 response (2) 24:20;27:13 responses (1) 87:19 responsibilities (2) 13:22;22:6 responsible (6) 64:5,7,9,20,24;65:3 rest (2) 19:3;67:2 restaurant (1) 121:12 restroom (1) 54:25 restrooms (1) 19:2 results (25) 101:15,20;102:2; 104:7;105:14,16; 106:4,21,22;107:9,11; 108:5;109:11,15,20,21; 110:6;113:19,21; 114:15;115:12,15,19, 20;124:10 retract (1) 68:14 retraction (1) 61:10 returns (2) 89:8;90:2 reveal (5) 21:25;60:11,15,20; 61:16 revealed (1) 34:23 review (4) 21:2;33:20;50:12; 106:3 reviewed (4) 51:7;63:15,17;76:15 rhetorical (2) 104:4,5 rid (1) 30:7 right (42) 29:8;34:9;38:19; 45:9,20;52:9;53:9; 56:3;57:11,19,24; 60:12;65:17,21;66:4, 12;70:7,16,17,21;71:5; 72:22;73:4;83:10;86:9; 87:14;97:14;100:1,4; 103:15;104:11,11; 106:22;107:25;110:7, 12;111:13;112:4,17;	113:16;121:18;123:6 ring (1) 121:16 rise (2) 69:24;71:15 rises (1) 109:1 Road (2) 23:14,17 Rob (1) 25:14 rodeo (1) 32:13 role (1) 51:25 Ron (4) 82:10;107:19; 110:15,19 room (5) 5:3,13,16,19,21 Roughly (1) 78:14 rules (4) 5:7;8:20;75:19,24 run (3) 13:8;74:21;100:3 running (2) 82:12;107:19 Russell (2) 68:1,97:13	screen (1) 123:2 scroll (2) 67:1;73:7 sealed (1) 102:1 seat (3) 68:5;73:1;74:19 second (7) 19:19;50:15;66:20, 21;67:2;103:1;124:9 secret (4) 31:25;32:7,11;82:23 secretary (23) 11:18;20:14;21:5,8, 12,19;25:15;26:15; 27:7;28:24;29:4;39:22, 23;44:15;47:8,9,21; 88:20,24;89:7,9;90:12; 105:25 seeing (1) 109:17 seem (2) 106:14;117:18 sees (2) 22:21;29:9 select (1) 76:10 Semiannual (1) 24:9 send (9) 28:14;44:21;59:6; 60:18,23;68:12;86:18, 18;120:6 sending (3) 59:20;60:5;116:8 sends (1) 25:15 sent (12) 28:18;59:14;63:22; 109:10;110:6,9,11; 113:23;114:18;115:16, 19;116:2 separate (10) 20:16;22:15;26:2; 27:15;29:12,16;47:4; 77:13;95:9;105:16 separately (4) 27:16;79:5,6,8 September (3) 42:24;53:11;114:16 series (2) 76:4,17 serve (2) 8:24;76:11 Server (3) 23:10,11,25 serves (1) 9:2 session (7) 44:6,11;76:23,25; 77:1,2,21 set (6)	14:13;27:11,15;98:9, 18;118:11 setting (1) 120:14 several (2) 69:12;114:20 Seymour (2) 78:21;79:6 sham (10) 109:11;110:5,13,17, 22;111:2,11,21; 115:10;117:12 share (3) 25:9;41:5;123:2 sharescreen (5) 25:9;29:8;37:3; 66:14;121:23 sheet (5) 106:2,6,22,24; 126:10 Sheryl (1) 27:6 short (1) 96:2 shortcuts (1) 13:18 shorten (1) 69:8 shoulders (1) 106:5 show (6) 25:10;52:23;73:5; 105:3;109:5;117:17 showed (1) 97:12 showing (4) 84:24;85:3;86:2; 104:24 sign (1) 125:1 Signature (1) 125:5 signed (2) 70:3,10 significance (2) 124:13,15 signs (1) 70:9 silence (1) 46:5 simple (1) 94:7 sit (1) 95:19 sits (1) 85:24 sitting (3) 12:3;35:23;79:11 Six (2) 8:11;63:13 skip (1) 74:10 slow (1)
		S		
		Sackman (2) 15:18,22 same (13) 5:6;49:4;53:3;57:12; 61:13,15,23;67:2; 72:20;86:16;102:3,22; 116:6 San (1) 7:17 satisfied (1) 35:17 satisfy (2) 35:3,18 saved (2) 82:22;83:17 saw (1) 108:7 saying (8) 83:14;87:20;102:2; 103:19;109:25,25; 110:4;115:13 school (11) 6:25;7:2,7;8:8,9; 58:11,21;72:25;74:18, 19;100:1 Scientific (1) 57:20 scope (4) 6:19;49:19;61:6; 105:7		

18:16 slowly (2) 67:1;73:7 SMITH (2) 5:22,22 so-called (1) 124:12 social (21) 73:3;97:20,23;98:15; 99:2,5;101:21;106:7, 25;107:10,14,24;108:5, 8;113:23;115:14,17; 117:14;119:17,24; 124:10 sole (1) 87:11 solely (2) 71:20;72:9 solicit (3) 36:12,15,17 solicitation (3) 35:25;36:22,25 soliciting (1) 29:10 somebody (1) 57:6 somebody's (1) 100:18 somehow (1) 45:19 someone (13) 37:14;59:9,13;67:23; 94:10;100:6;103:20, 21;110:16,21,23; 112:2;120:2 sometimes (3) 18:12;66:15;86:16 somewhat (1) 107:3 somewhere (2) 24:25;116:14 soon (1) 106:3 sorry (20) 7:1;10:1;13:3;15:13; 40:11;45:25;46:14; 48:17;63:9;64:13,16; 71:8;79:7;81:24;85:1; 93:4;96:3;99:17; 113:20;118:24 sort (3) 9:18;11:11;18:11 sought (1) 74:21 sound (1) 21:20 sounds (2) 12:24;60:9 Souza (3) 73:20,22;117:2 spam (1) 116:14 speak (1)	69:11 speakers (2) 48:15;93:19 speaking (3) 6:12;18:15,19 spearheaded (2) 50:19;51:2 spearheading (1) 51:4 special (3) 76:21,25;77:2 specific (8) 8:21;13:8;30:16,17, 24;52:12;65:12;73:5 specifically (5) 64:2;73:16;97:15; 98:7;104:21 specificity (2) 98:11;99:10 specifics (2) 58:18;96:16 specified (2) 48:12;50:2 specify (1) 50:1 spell (1) 55:18 spelled (2) 55:20;56:1 spelling (1) 122:2 spend (1) 64:11 spending (1) 64:8 spent (3) 22:18;30:11;90:7 spite (1) 46:3 split (1) 32:12 spoke (2) 29:18;98:7 Spring (2) 120:23,24 standard (1) 101:12 standing (4) 11:4;92:23;93:1,11 start (1) 20:19 started (6) 18:18;53:16,19,20; 85:12;93:24 state (23) 6:6;8:20;10:11;21:5, 8,12,19;25:15;26:15; 27:7;29:4;30:21;31:20; 46:15;47:8,22;84:8; 88:20,24;89:7,9;90:13; 117:8 statement (18) 8:25;29:13;83:14;	84:3;85:9;86:5;106:13; 107:25;108:2,8; 110:12;111:20,23; 114:2;115:8,22;116:5, 9 statements (4) 73:3,5;84:10;93:8 State's (1) 28:24 stating (2) 5:11;98:16 status (4) 24:4,6,18;38:2 stay (1) 22:2 step (2) 77:6,13 steps (1) 76:17 stick (1) 75:18 still (3) 33:6;35:16;60:25 stipulated (4) 33:21,24;34:13; 35:11 Stolen (3) 104:9,10;124:12 stop (1) 119:7 stopped (1) 119:4 storage (5) 16:22,23,25;17:4,7 store (1) 89:19 Storing (1) 88:10 Street (2) 3:5;56:18 stretch (1) 54:25 strike (5) 20:18;104:18; 107:22;113:14,14 string (1) 114:1 stuck (1) 60:14 stuff (1) 74:11 subcommittee (1) 13:14 subcommittees (1) 76:6 subject (8) 33:23;34:21;40:7; 42:6;47:24;69:25; 71:10,17 SUBSCRIBED (1) 126:16 subsequent (1) 43:3	subsequently (1) 87:8 substance (2) 22:1;32:21 sue (6) 64:5;65:3;67:24; 68:17;112:20,25 sued (5) 31:24;46:12,18; 56:19;113:2 suing (5) 46:16,17;71:4; 112:22;117:1 suit (30) 14:23;15:19;37:19; 40:17;43:2,4,20;45:4; 46:3,24;53:23,24;54:5, 7,16,17,18;56:11,13; 58:15;59:5,21;71:15, 18;73:18;74:7;118:2, 23,24;121:6 suit's (1) 72:16 summary (1) 77:14 superior (1) 42:17 support (16) 29:24;56:20;74:12, 15;76:11;77:19;84:4,7, 11,17,18;85:11;95:6; 119:4,7,10 supported (1) 77:17 supporters (2) 73:22;74:4 supporting (1) 74:6 supposed (1) 60:15 supremacist (2) 74:6;112:9 supremacists (4) 68:22;70:16;71:9,14 sure (15) 12:21;28:15;31:7; 34:5;55:2;72:20;74:8; 75:6;78:24;100:8; 113:18,21;115:1; 120:4;121:24 switch (1) 100:3 sworn (4) 5:5;6:2;126:2,16 system (3) 56:7;113:11;117:11 system's (1) 115:9	tabulated (1) 101:25 talk (10) 32:4;34:24;38:1; 39:4,7;66:1;75:3; 87:16;113:9;116:10 talked (13) 32:7;37:21;39:10; 47:2;56:17;63:15;66:2; 70:11;92:19;97:16; 101:17;104:23;117:7 talking (9) 32:13,14;51:14; 61:19;71:11;85:13; 96:8;115:12,18 tallied (4) 80:4,10;81:16;106:2 tally (15) 80:21,24;81:13; 105:13,15;106:2,6,8, 14,17,22,24;107:24; 108:4;123:16 Tamara (1) 78:21 tax (2) 89:8;90:2 telephone (2) 28:11,12 tellers (2) 106:2,3 telling (4) 57:1,2;58:6;71:13 ten (3) 54:25;58:14;63:13 term (1) 14:24 terms (1) 89:10 Terri (1) 78:21 terribly (1) 82:8 territory (1) 60:2 testified (2) 6:3;85:10 testify (1) 116:1 testimony (5) 5:6;27:19;51:3; 52:11;92:5 thanks (1) 111:1 theory (1) 65:25 thereafter (1) 33:20 therefore (1) 70:10 therein (2) 126:7,8 thereof (1) 126:6
			T	
			table (1) 79:11	

<p>third (3) 32:23;35:19;89:16 though (5) 6:24;45:5;83:9; 108:12;122:23 thought (1) 60:5 three (5) 17:8;39:16;54:1; 68:5;89:12 Thursday (1) 32:16 Thursday's (1) 124:2 tied (1) 124:16 Tim (1) 79:18 times (4) 8:6;18:15;19:12; 68:6 title (1) 11:8 titles (1) 9:19 today (14) 12:3;35:23;39:5,8, 11,12;66:20;69:18; 70:21;73:15;95:19; 97:22;98:2,4 together (3) 40:15;124:3,16 told (6) 18:17;21:17;38:7; 41:5;51:25;108:17 tomorrow (1) 40:7 took (8) 45:8,8,13;55:8;75:2; 80:6,9;102:1 top (5) 17:3;96:12;98:14; 120:11,21 toward (1) 28:25 track (1) 18:1 transactions (2) 89:23,24 transcript (2) 33:18;62:20 transfer (3) 92:9,12,15 transferred (1) 92:2 transparent (1) 19:8 treasurer (26) 15:12,15,16,23;16:4, 9,10,20;17:23,25;18:6; 19:25;20:18;21:3,4; 22:5,22;23:1,24;24:2, 19;25:3,19;47:12;</p>	<p>90:19;91:19 Treasurer's (3) 90:21,21;91:19 treat (3) 33:18,22;34:12 treated (1) 35:10 trend (3) 95:5;109:5;117:15 Trends (4) 95:1,4,20;104:24 trial (4) 49:5;84:6;98:2,3 true (3) 108:9;114:11;126:8 trust (1) 97:6 trustee (2) 8:9;100:1 truth (2) 6:2;85:8 truthful (9) 107:25;108:2; 110:11,14;114:2; 115:7,21;116:5,9 try (5) 18:16;19:1;32:22; 123:2,4 trying (7) 46:5;63:24;71:12,19; 72:1;93:16;112:12 turn (7) 74:25;84:17;86:11; 102:13,15;105:3,19 turned (1) 105:25 turning (1) 8:15 tweet (4) 32:4,6;33:3;124:11 tweets (1) 33:4 twice (1) 19:13 Twitter (1) 120:15 two (9) 26:24;27:21;28:3,10; 36:5;39:16;89:14; 119:9;124:5 Tyler (2) 58:19;78:12 type (1) 24:2 typically (5) 16:16;25:4;44:4; 101:6,9</p>	<p>5:7;12:4;84:8 underlying (2) 75:12;82:22 understands (1) 34:19 understood (1) 94:3 unilaterally (1) 86:20 unless (1) 9:5 unnamed (1) 121:19 unsubstantiated (1) 33:2 unveil (1) 31:25 up (20) 14:13;27:11,15;37:8; 40:7,16;44:19;50:15; 53:17;55:9,14;56:17; 62:9;66:18;73:19; 82:22;83:17;86:15; 114:23;124:1 upon (5) 97:7,17;98:8,16,17 upset (2) 96:18;118:20 use (12) 13:2,7;19:2;31:23; 32:25;38:20,22;54:25; 66:16;100:21,21; 109:16 used (9) 27:18,21;29:6,21; 66:22;88:9;89:18,92:6, 7 uses (1) 107:24 using (2) 65:19;89:10 usually (2) 19:1;25:5</p>	<p>vets (1) 76:16 vetted (5) 82:19;99:13;101:14; 123:23;124:19 vetting (26) 9:10;12:6;13:15; 67:11;76:3,6,8,16,16; 77:16,19;78:2,4,5,6,7, 7,10;79:19;82:15; 107:18;110:5,13; 111:21;115:9;117:11 via (2) 35:25;115:20 vice (1) 78:21 video (1) 5:13 [REDACTED] 36:9 vocal (1) 46:7 vote (9) 42:10,12;43:11,13, 18;77:4;80:24;81:18; 105:24 voted (2) 105:20;106:1 voters (2) 10:7;13:23 votes (10) 77:7;80:4,13,19,22; 81:7,11,13,13,15</p>	<p>96:8;107:17 what's (26) 11:20;17:2;20:20,23; 22:18;23:22;24:6;35:8; 36:7,10;49:9;69:17; 70:11;71:1,6;88:9,20; 89:16,16;100:16; 106:5,24;107:2; 109:23;112:13;124:15 Where's (4) 7:10;16:25;23:11,13 white (11) 68:10,22,22;70:15, 15;71:9,14;74:6,6; 112:3,9 Whoa (5) 48:16,16,16;93:20, 20 whole (2) 62:19;76:24 Who's (2) 40:9;62:25 wife (1) 39:14 [REDACTED] 36:5;37:5 [REDACTED] 36:7,15 willing (1) 34:3 win (1) 74:18 Winter (1) 120:23 withheld (1) 109:19 withholding (1) 109:15 within (8) 11:2,24;26:24;35:22; 49:18;61:6;76:6;105:7 without (5) 84:4,7,11,18;86:6 witness (72) 5:5,20;12:4;13:5; 18:4,9;21:16;22:4; 23:17,19;31:18;32:21; 33:12;35:7,21,24; 36:14;38:17;40:2,12; 41:8,14;44:3;45:7,15; 46:16;48:25;49:9,12, 17;50:7;52:19;53:1; 55:4;57:6,13;60:1,12; 61:16,17;62:4,21; 65:23;68:25;70:2;71:1, 24;72:13;73:13;75:18; 81:24;82:4;83:13; 84:15;86:14,20;87:11; 93:15;95:12;102:12, 22;110:4,9;111:6,11, 20;112:11;116:1,7; 122:5;126:1,4 woman (3)</p>
		V	W	
	U	<p>vacancies (1) 10:17 vague (2) 8:21;93:16 Vander (1) 78:22 variety (1) 37:22 various (1) 118:8 verbiage (2) 100:21,21 verify (1) 70:8 versus (4) 52:16;55:15;58:18, 21</p>	<p>waiting (1) 33:7 waive (1) 5:9 walk (2) 9:18;91:16 Walt (4) 15:18,22,24;16:5 wants (2) 5:23;81:6 way (17) 27:11;33:18;34:10; 57:1,2,9,13,15,21;58:1, 5;92:25;102:16; 112:15;115:6;117:18; 124:20 weather (1) 38:2 website (5) 8:25;12:20,21,22; 36:1 week (1) 59:3 weren't (4) 96:19,21;97:2,14 whatnot (5) 11:18,18;22;89:1;</p>	

121:9,10,19 word (9) 13:1,6,7;38:19,20; 107:14,24;109:17; 111:2 wording (1) 93:3 words (9) 8:17;9:24;24:4; 25:25;38:21,24;51:5; 66:16,21 work (6) 9:25;20:17;23:12,13; 49:13;105:22 worked (1) 123:5 works (2) 105:17;123:4 Worley (1) 82:12 worse (3) 112:2,5,8 writing (1) 25:4 written (3) 87:5,7,19 wrong (4) 13:1,6;107:2;122:16	100 (1) 101:5 10th (2) 55:12;56:14 11 (2) 75:10,12 11:10 (1) 55:5 11:31 (1) 55:6 12:01 (1) 75:8 12:05 (1) 75:9 12:38 (1) 96:4 128 (1) 126:5 13 (5) 82:18;85:9;93:8; 95:22;99:12 13th (3) 53:15,17;58:13 15 (1) 101:13 15th (2) 101:24;114:16 17 (3) 105:12;107:3;109:7 19 (5) 109:9,17,22;110:1; 117:10 1978 (1) 7:23 1980 (1) 7:22 1980s (1) 19:15 1st (5) 47:15,15,17,17; 52:15	54:7;56:14;63:12;78:8; 80:4,9,13,23;114:16 2024 (1) 120:25 205 (1) 10:25 208 (1) 3:7 23 (2) 25:14;55:13 26th (3) 25:14;53:8,17 271 (1) 8:9 29th (1) 15:21 3 3 (4) 123:18,22;124:2,7 30 (1) 75:2 30-day (1) 33:20 35 (1) 75:2 3rd (3) 3:5;58:12,22 4 4 (3) 123:15;124:3,6 5 5,000 (2) 31:6;82:20 5th (1) 55:12	3:6 9 9 (1) 124:2 9/15/23 (1) 82:19 923 (1) 3:5
Y			
year (7) 47:15;51:20,21;52:3; 54:16;56:24;100:1 years (4) 17:8;27:22;28:4; 54:20 youth (2) 39:22;40:9 Yup (1) 38:18			
Z	2	6	
Zoom (2) 18:11;81:23	2:07 (1) 125:4 20 (1) 109:13 20 (2) 126:11,17 2013 (1) 8:8 2014 (6) 9:16,18,22;10:21; 11:6;63:23 2020 (2) 58:11,12 2022 (7) 47:17;54:7;80:9; 82:12,15;107:18; 110:20 2023 (13) 47:15,18;53:9,15;	61 (1) 10:24 667-6287 (1) 3:7 6956 (2) 23:14,17 7 7/4/58 (1) 6:10 75 (1) 7:13 76 (1) 7:12 8 83816-2155 (1)	
1			
1 (1) 126:5 1,000 (1) 31:4 1:17 (1) 96:5 1:45 (1) 115:3 1:49 (1) 115:4 1:52 (1) 117:23 1:57 (1) 117:24			