EXHIBIT 1
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1. always -- it's always been a topic, you know, that
2. we -- that we need to do training for our staff and
3. remind them that -- you know, that they need to
4. offer voter registration services. *
5. Q. When your -- when you began as a regional
6. manager -- I'm trying to remember. Was it David?
7. A. David.
8. Q. David. The last name?
10. Q. Devitt. So if I understand what you just
11. said correctly, when you began as a regional
12. manager, were you holding -- or engaging in these
13. types of meetings at that time, the regional manager
14. bureau?
15. A. They were more -- I'm sorry. I'm supposed
to let you finish.
16. Q. All right. Well, I'll back up a little
17. bit. You said that you currently have the bureau
18. chief and ROM meetings every two or three months, or
19. try to at least. Was that -- was that -- was that
20. true at the time you became a regional manager?
21. A. Yes. But the bureau chiefs weren't always
22. included. It was more, like, David and the -- and
23. the ROMs.
24. Q. Uh-huh.

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1. A. And part of that was logistics.
2. Q. So do you recall voter registration being
3. discussed during some of those meetings at that
time?
4. A. Yes. I believe it was. I seem to
5. remember that.
6. Q. Were there -- did HSD issue any documents
7. with regard to voter registration before Mr. Roth
8. became the deputy director?
9. A. I don't know. I know that latest GI was
10. 2008. But -- but we always had the voter
11. registration manuals. But I really don't recall
12. whether or not they issued any other GIs or IPPs or
13. anything.
14. Q. What was the source of that voter
15. registration manual that you just referred to?
16. A. Well, it was put out by the -- I'm trying
to think. Who was it put out by? Whoever heads up
17. voter registration. It's a federal --
18. Q. To the extent that you recall.
19. A. You know, and I -- I just reread it
20. recently. And I can't remember who puts it out.
21. But it's not HSD. You know, it's the federal
22. document. So -- so I don't think it's changed
23. that -- you know, it's the same one that they issued

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1. in 1994 and 1995, whenever it was, with the real
2. little print. But it has all the instructions.
3. But I know that we've been -- we have
4. posters. So I'm guessing we must have had GIs,
5. because we've had posters for as long as I can
6. remember in our offices. So -- and I know this GI
7. I'm thinking of from 2008 had everything attached to
8. it, all the stuff attached to it. So I don't -- but
9. I don't recall specific GIs before this one.
10. Q. What I -- yes. What I want to try to do
11. is understand what was occurring at the regional
12. manager, bureau chief level with regard to voter
13. registration before that 2008 GI came out. And I
14. understand that Mr. Roth may have -- might have been
15. involved in -- you know, he was a deputy director
16. for some time before that GI came out. Correct?
17. A. I think so.
18. Q. Okay.
19. A. He's two years, maybe, he's been -- yeah.
20. Q. What I'm just trying to do is to say,
21. let's take the -- the issuance of that -- of that
22. January 2008 GI and say, prior to that time.
23. A. Okay.
24. Q. I want to try to understand all the
25. activities that you can recall going on at your

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1. level, at the regional manager level and the bureau
2. chief level, with regard to voter registration. You
3. had said that there was some -- that there were some
4. discussions of it during those meetings. What else,
5. if anything, was going on at the regional manager,
6. bureau chief level with regard to voter registration
7. during that time?
8. A. I really don't recall. I -- I mean, I --
9. it was just general discussion, you know, what we
10. need to do in our offices, review of numbers when we
11. had them, and just, basically, reminders, like we do
12. for everything else. I mean, most of the activities
13. going on are discussion reminders, you know, talk
14. about how we put our procedures in place, what needs
to happen, you know, training, that kind of thing.
15. So -- but I don't remember -- I don't
16. recall specific documents. And I can't recall
17. specific occasions. I just know that it was
18. discussed. But most of our activities would be
19. discussion, reminders, that kind of thing.
20. Q. Were there -- do you recall any -- any
21. specific directions being given to regional managers
22. to -- to pay more attention to voter registration
23. during that period?
24. A. Well, I don't know about more attention.