EXHIBIT 1
always – it’s always been a topic, you know, that we – that we need to do training for our staff and remind them that – you know, that they need to offer voter registration services.

Q. When your – when you began as a regional manager – I’m trying to remember. Was it David?

A. David.

Q. David. The last name?

A. Devitt.

Q. Devitt. So if I understand what you just said correctly, when you began as a regional manager, were you holding – or engaging in these types of meetings at that time, the regional manager bureau?

A. They were more – I’m sorry. I’m supposed to let you finish.

Q. All right. Well, I’ll back up a little bit. You said that you currently have the bureau chief and ROM meetings every two or three months, or try to at least. Was that – was that – was that true at the time you became a regional manager?

A. Yes. But the bureau chiefs weren’t always included. It was more, like, David and the -- and the ROMs.

Q. Uh-huh.

in 1994 and 1995, whenever it was, with the real little print. But it has all the instructions. But I know that we’ve been -- we have posters. So I’m guessing we must have had GIs, because we’ve had posters for as long as I can remember in our offices. So -- and I know this GI I’m thinking of from 2008 had everything attached to it, all the stuff attached to it. So I don’t -- but I don’t recall specific GIs before this one.

Q. What I – yes. What I want to try to do is understand what was occurring at the regional manager, bureau chief level with regard to voter registration before that 2008 GI came out. And I understand that Mr. Roth may have -- might have been involved in -- you know, he was a deputy director for some time before that GI came out. Correct?

A. I think so.

Q. Okay.

A. He’s two years, maybe, he’s been -- yeah.

Q. What I’m just trying to do is to say, let’s take the -- the issuance of that -- of that January 2008 GI and say, prior to that time.

A. Okay.

Q. I want to try to understand all the activities that you can recall going on at your level, at the regional manager level and the bureau chief level, with regard to voter registration. You had said that there was some -- that there were some discussions of it during those meetings. What else, if anything, was going on at the regional manager, bureau chief level with regard to voter registration during that time?

A. I really don’t recall. I -- I mean, I -- it was just general discussion, you know, what we need to do in our offices, review of numbers when we had them, and just, basically, reminders, like we do for everything else. I mean, most of the activities going on are discussion reminders, you know, talk about how we put our procedures in place, what needs to happen, you know, training, that kind of thing.

So -- but I don’t remember -- I don’t recall specific documents. And I can’t recall specific occasions. I just know that it was discussed. But most of our activities would be discussion, reminders, that kind of thing.

Q. Were there -- do you recall any -- any specific directions being given to regional managers to -- to pay more attention to voter registration during that period?

A. Well, I don’t know about more attention.