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1 THE DEPOSITION OF DENNIS MANSFIELD was
 2 taken on behalf of the Defendant at the Attorney
 3 General's Office, 954 W. Jefferson Street, Boise,
 4 Idaho, commencing at 1:30 on September 16, 2010,
 5 before Kamra Toalson, Certified Shorthand
 6 Reporter and Notary Public within and for the
 7 State of Idaho, in the above-entitled matter.

8

9 APPEARANCES

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11 For the Plaintiffs:
 12 Troupis Law Office, P.A.
 13 BY: CHRIST R. TROUPIS
 14 1299 E. Iron Eagle, Suite 130
 15 Eagle, Idaho 83616

16 For the Defendant:
 17 Office of the Attorney General
 18 BY: Michael S. Gilmore
 19 954 W. Jefferson Street
 20 Boise, Idaho 83720-0010

21 For the Defendant Intervenors:
 22 Law Office Of Harry Kresky
 23 BY: HARRY KRESKY (Appearing by telephone)
 24 250 West 57th Street, Suite 2017
 25 New York, New York 10107

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8 EXHIBITS

9 NO.	DESCRIPTION	PAGE
10 1	Affidavit of Dennis Mansfield	4
11 2	Idaho Primary Election Results	4
12 3	May 23, 2000 Primary Election Results	4
13 4	Spreadsheet	4

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1 (Deposition Exhibit Nos. 1 through 4
 2 were marked for identification.)
 3 DENNIS MANSFIELD,
 4 first duly sworn to tell the truth relating to
 5 said cause, testified as follows:
 6 EXAMINATION
 7 BY MR. GILMORE:
 8 Q. Good afternoon, Mr. Mansfield. We have
 9 a few technicalities to take care of before we
 10 start asking questions.
 11 A. Sure.
 12 Q. My name is Michael Gilmore. I'm a
 13 Deputy Attorney General representing Secretary of
 14 State, Ben Ysursa.
 15 MR. GILMORE: Would you like to
 16 identify yourself, please, Harry.
 17 MR. KRESKY: Yeah. Hi. Harry Kresky.
 18 I represent eleven Idaho intervenors as
 19 defendants on the Attorney General's side, as
 20 well as two organizations, one in Idaho, and one
 21 national organization.
 22 MR. GILMORE: And Christ.
 23 MR. TROUPIS: And Christ Troupis
 24 representing the Idaho Republican Party.
 25 MR. GILMORE: And, Mr. Mansfield,

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1 before we start questions, I just have a few
 2 technical objections. I will object to paragraph
 3 6 as hearsay. I will object to paragraph 16 to
 4 the extent it assumes a fact not in evidence,
 5 that there was Democratic crossover voting. I
 6 object to paragraph 17 to the extent it assumes a
 7 fact not in evidence, that there was Democratic
 8 crossover voting. I object to paragraph 18 to
 9 the extent it assumes a fact not in evidence,
 10 that there was Democratic crossover voting.
 11 The technicalities are out of the way,
 12 and I think we're ready to begin.
 13 Q. (By Mr. Gilmore) Mr. Mansfield, have
 14 you ever had your deposition taken before?
 15 A. I have.
 16 Q. And are you familiar with the
 17 procedures?
 18 A. I am.
 19 Q. And if, for some reason, when I ask a
 20 question, if it doesn't make sense or you're not
 21 sure what I'm asking, please feel free to ask me
 22 to rephrase it, because it's important that you
 23 understand the question that I'm asking, because
 24 then your answer will be better.
 25 A. Absolutely no problem.

Summary of Comments on Mansfield Deposition.ptx

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Number: 1 Author: user Subject: Sticky Note Date: 10/2/2010 3:25:41 PM
Objections to Mansfield Affidavit

Author: lwinmill Subject: Sticky Note Date: 10/12/2010 7:27:08 AM
Sustained as to para 6. Hearsay.

Sustained as to reference in para 16 to "democratic cross over voting," But balance of para is admitted. Assumes facts not in evidence.

Overruled as to para 17. Although statement implicitly relies upon existence of "democratic cross over voting" referenced in para 16, witness is entitled to describe what election strategy he used in the 2006 election.

Overruled as to para 18, since it again describes actions which he took based upon his belief that there is cross over voting. However, it is sustained to the extent that it is offered to show the existence of cross over voting.