

1 district from being 42.5 to 39 percent
2 black contradicts the claim that the
3 proposed 32nd District is made for the
4 purpose of being a majority-minority
5 district.

6 "Redistricting Senator Linda Garrou
7 out of this district appears to be a
8 solely partisan based decision. Please
9 refer to Senator Linda Garrou in your
10 plan as 'Incumbent Senator Linda Garrou'
11 instead of the radically [sic] charged
12 'current white incumbent.'

13 "Most importantly, please keep
14 Senator Linda Garrou in the district she
15 currently represents."

16 Q. Did that statement come to you from somebody in
17 an e-mail?

18 A. I don't even remember the statement. I don't
19 remember the statement.

20 Q. You don't remember it?

21 A. No. I mean, there was --

22 Q. Did your e-mail indicate who sent you that
23 statement?

24 A. I don't remember the e-mail.

25 Q. Okay.

1 A. So I'm not sure I can help with that answer.

2 Q. And after you received this e-mail, did you in
3 fact increase the black voting age population
4 in Senate District 32?

5 A. My best recollection on Senate District 32,
6 which was a pod or grouping between Yadkin and
7 Forsyth County, was -- and we were committed to
8 that two-county -- that two-county pod of
9 Yadkin and Forsyth. It -- we could never
10 achieve a majority-minority district in that
11 area complying with Stephenson criteria, which
12 is what we were doing.

13 I'm not sure who would send that.

14 Q. Okay. Did you increase the black voting age
15 population in that district from 39 percent to
16 42 percent?

17 A. I can't remember.

18 Q. Would the record reflect whether that happened
19 or not?

20 A. I don't know.

21 Q. Do you recall whether or not Senator Garrou was
22 in or outside Senate District 32?

23 A. You mean subsequently or --

24 Q. At any point.

25 A. Well, I think in the end she was in