

STATE OF NORTH CAROLINA IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
COUNTY OF WAKE 11 CVS 16896
11 CVS 16940

MARGARET DICKSON, et al.,)
)
Plaintiffs,)
vs.)
ROBERT RUCHO, in his)
official capacity only as)
the Chairman of the North)
Carolina Senate)
Redistricting Committee,)
et al.,)
)
Defendants.)
)
NORTH CAROLINA STATE)
CONFERENCE OF BRANCHES OF)
THE NAACP, et al.,)
)
Plaintiffs,)
vs.)
STATE OF NORTH CAROLINA,)
et al.,)
)
Defendants.)
)

DEPOSITION OF KELLY DOSS
GUILFORD COUNTY BOARD OF ELECTIONS

10:05 A.M.

THURSDAY, MARCH 15, 2012

GUILFORD COUNTY ATTORNEY
301 WEST MARKET STREET
SUITE 310
GREENSBORO, NC 27401

By: Denise Myers Byrd, CSR 8340, RPR

Exhibit 5

1 Q. Can you tell me how many VTDs there are in Guilford
2 county? Do you know?

3 A. Okay. We have 165 precincts and then there is
4 going to be -- I believe it is 161 --

5 Q. 161?

6 A. -- Voting Tabulation Districts, VTDs.

7 Q. And what's the -- what accounts for the difference
8 between the number of VTDs and the number of
9 precincts?

10 A. Okay. The Voting Tabulation Districts were put in
11 place by the State in 2008 so that they're not
12 subject to change in the future. We cannot change
13 the VTDs. And they did that so there would be a
14 commonality in the years for election results that
15 people can look at to compare election results over
16 the years.

17 And originally we had 165 precincts.

18 However, some of those precincts there are
19 stipulations to them like -- for an example, one of
20 the precincts is divided into G42-A and
21 G42-B -- I'm sorry. A VTD is G42 and the precincts
22 G42-A and G42-B, and that is just because G42-B is
23 just a nursing home, and that's why it was
24 established just for that nursing home.

25 And the State does not recognize that as --

1 you know, under their guidelines as being a Voting
2 Tabulation Districts, so they just have G42.

3 And in all of the situations it's just they
4 don't recognize the splits that we have either
5 because it doesn't follow their definition of what
6 a Voting Tabulation District is, if it doesn't
7 follow some sort of physical boundary, so there's
8 just -- the only difference is that some of the
9 Voting Tabulation Districts are just split in two
10 precincts.

11 **Q.** And did that -- did those splits happen after 2008
12 when the VTDs were established?

13 **A.** No. Those precincts were already in place and the
14 State in going through and creating the Voting
15 Tabulation Districts just said we don't have
16 information that shows that this can be a Voting
17 Tabulation District based on the definition of what
18 that is so they've just combined those precincts
19 into one.

20 **Q.** And am I right, then, if you're -- that then there
21 have not been any changes in the precincts since
22 2008?

23 **A.** No.

24 **Q.** So following the release of the 2010 census data
25 and the redistricting that was done, how many