

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE

3 NORTHERN DISTRICT OF ALABAMA

4
5 CIVIL ACTION NO.: 2:21-cv-001536-AMM

6
7 MARCUS CASTER, ET AL.,

8 Plaintiffs,

9 vs.

10 HON. WES ALLEN, IN HIS OFFICIAL

11 CAPACITY AS ALABAMA SECRETARY OF

12 STATE, ET AL.,

13 Defendants.

14
15 DEPOSITION OF COUNCILMAN WILLIAM CARROLL

16
17 S T I P U L A T I O N S

18 IT IS STIPULATED AND AGREED by and between the
19 parties, through their respective counsel, that the
20 deposition of COUNCILMAN WILLIAM CARROLL, may be taken
21 before Kathleen Cain, Commissioner, at the law offices of
22 Helmsing, Leach, Herlong, Newman & Rouse, 150 Government
23 Street, Suite 2000, Mobile, Alabama 36602, on the 5th day
24 of September 2024.

25 IT IS FURTHER STIPULATED AND AGREED that the

<p style="text-align: right;">Page 2</p> <p>1 signature to and the reading of the deposition by the</p> <p>2 witness is not waived.</p> <p>3 IT IS FURTHER STIPULATED AND AGREED that it</p> <p>4 shall not be necessary for any objections to be made by</p> <p>5 counsel to any questions except as to form or leading</p> <p>6 questions, and that counsel for the parties may make</p> <p>7 objections and assign grounds at the time of the trial,</p> <p>8 or at the time said deposition is offered in evidence, or</p> <p>9 prior thereto.</p> <p>10 IT IS FURTHER STIPULATED AND AGREED that the</p> <p>11 notice of filing of the deposition by the Commissioner is</p> <p>12 waived.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 ELIAS LAW GROUP, by Makeba Rutahindurwa, Esq.,</p> <p>4 1700 Seventh Avenue, Suite 2100, Seattle, Washington</p> <p>5 98101, appearing on behalf of the Plaintiffs.</p> <p>6</p> <p>7 OFFICE OF THE ATTORNEY GENERAL, by Charles A.</p> <p>8 McKay, Esq., and Dylan L. Mauldin, Esq., 501 Washington</p> <p>9 Avenue, Montgomery, Alabama 36130-0152, appearing on</p> <p>10 behalf of the Defendants, Hon. Wes Allen in his official</p> <p>11 capacity as Alabama Secretary of State.</p> <p>12</p> <p>13 BALCH & BINGHAM, by Dorman Walker, Esq., 445</p> <p>14 Dexter Avenue, Suite 8000, Montgomery, Alabama 36104,</p> <p>15 appearing via Zoom on behalf of the Defendants, the</p> <p>16 Redistricting Chairs.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 EXAMINATION INDEX</p> <p>2</p> <p>3 COUNCILMAN WILLIAM CARROLL: PAGE</p> <p>4 BY MR. MAULDIN 6</p> <p>5</p> <p>6 EXHIBIT INDEX</p> <p>7 EXHIBIT:</p> <p>8 EXHIBIT 1 MAP OF ALABAMA COUNTIES 39</p> <p>9 EXHIBIT 2 VIDEO FOOTAGE 41</p> <p>10 EXHIBIT 3 2023 PROPOSED MAP 57</p> <p>11 EXHIBIT 4 CURRENT CONGRESSIONAL REDISTRICTING MAP 91</p> <p>12 EXHIBIT 5 CITY OF MOBILE COUNCIL DISTRICTS 94</p> <p>13 EXHIBIT 6 MAP OF CONGRESSIONAL DISTRICTS AND MOBILE 97</p> <p>14 CITY COUNCIL DISTRICTS</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 I, Kathleen Cain, RPR, a Court Reporter of</p> <p>2 Mobile, Alabama, and Notary Public for the State of</p> <p>3 Alabama at Large, acting as Commissioner, certify that on</p> <p>4 this date, as provided by the Federal Rules of Civil</p> <p>5 Procedure and the foregoing stipulation of counsel, there</p> <p>6 came before me at 150 Government Street, Suite 2000,</p> <p>7 Mobile, Alabama 36602, beginning at 1:16 p.m., COUNCILMAN</p> <p>8 WILLIAM CARROLL, witness in the above cause, for oral</p> <p>9 examination, whereupon the following proceedings were</p> <p>10 had:</p> <p>11 COUNCILMAN WILLIAM CARROLL,</p> <p>12 the witness, having been first duly sworn by the</p> <p>13 Court Reporter, was examined and testified as follows:</p> <p>14 THE COURT REPORTER: Do we have the usual</p> <p>15 stipulations here also?</p> <p>16 MS. RUTAHINDURWA: Yes. I want to inform the</p> <p>17 councilman that you're entitled to read and sign, so look</p> <p>18 over the transcript and make sure everything is correct.</p> <p>19 So I recommend that you do that.</p> <p>20 A. At the end of the deposition?</p> <p>21 MS. RUTAHINDURWA: When the transcript comes in</p> <p>22 a couple of weeks.</p> <p>23 A. Thank you.</p> <p>24 MS. RUTAHINDURWA: Yes. So usual stipulations,</p> <p>25 but he'll read and sign.</p>

<p style="text-align: right;">Page 6</p> <p>1 EXAMINATION</p> <p>2 BY MR. MAULDIN:</p> <p>3 Q. Good afternoon, Councilman Carroll. My name is</p> <p>4 Dylan Mauldin, and I represent the Alabama Secretary of</p> <p>5 State in this Congressional redistricting lawsuit filed</p> <p>6 by the Caster Plaintiffs.</p> <p>7 Are you aware that you have been disclosed as a</p> <p>8 potential fact witness by the Caster Plaintiffs?</p> <p>9 A. Yes, sir.</p> <p>10 Q. So this deposition is an opportunity for us to</p> <p>11 record your testimony. I'll be asking you questions</p> <p>12 which you'll be answering under oath. Your counsel may</p> <p>13 object from time to time. Your counsel is just making a</p> <p>14 record, but you're still required to answer the question</p> <p>15 unless directed otherwise. Do you understand?</p> <p>16 A. Yes.</p> <p>17 Q. There's a court reporter here, and she'll be</p> <p>18 creating a transcript of everything said. Because we</p> <p>19 need her to create an accurate transcript, it's important</p> <p>20 that we do not speak over each other. I will wait to</p> <p>21 speak until you have finished, and if you will wait until</p> <p>22 I finish my question, it will also help ensure that you</p> <p>23 are answering the question that I'm asking. Do you</p> <p>24 understand?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 8</p> <p>1 deposited before today?</p> <p>2 A. Yes.</p> <p>3 Q. In your professional or personal capacity?</p> <p>4 A. Define which profession.</p> <p>5 Q. From any of them, any of your --</p> <p>6 A. Yes.</p> <p>7 Q. And what were those?</p> <p>8 A. Contracting, project management. Yeah, mostly.</p> <p>9 Q. How many times have you been deposed?</p> <p>10 A. I think twice. I can't remember.</p> <p>11 Q. Twice?</p> <p>12 A. I think twice.</p> <p>13 Q. Have you ever testified in court?</p> <p>14 A. I have.</p> <p>15 Q. In trial?</p> <p>16 A. Yes.</p> <p>17 Q. And was it related to one of those contract</p> <p>18 disputes?</p> <p>19 A. Yes.</p> <p>20 Q. Have you testified under oath in any other</p> <p>21 setting?</p> <p>22 A. I want to say yes. I just can't remember, to be</p> <p>23 exact. There was an investigation into some accusations</p> <p>24 with the city. I can't remember if we were testifying</p> <p>25 under oath or not.</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. Similarly, it's important that you answer</p> <p>2 questions yes or no rather than shaking your head or</p> <p>3 saying "uh-huh" or "un-uh" or some other informal answer.</p> <p>4 Does that make sense?</p> <p>5 A. Uh-huh. Yes, sir.</p> <p>6 Q. If you do not understand the question, please</p> <p>7 let me know, and I'll try to ask it again so we can stay</p> <p>8 on the same page. Will you do that?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Sometimes a witness gives an answer, and later</p> <p>11 in the deposition, realizes that he needs to go back</p> <p>12 because he forgot something or misspoke. If you need to</p> <p>13 add or correct anything during the course of your</p> <p>14 deposition, please let me or your counsel know.</p> <p>15 A. Okay.</p> <p>16 Q. And we might take breaks, and if you need a</p> <p>17 break, let me know. If there's a question pending, I'll</p> <p>18 still need you to answer the question before we break.</p> <p>19 Is there any reason you cannot provide truthful</p> <p>20 and complete testimony here today?</p> <p>21 A. Not that I'm aware of.</p> <p>22 Q. Could you please state your full name for the</p> <p>23 record.</p> <p>24 A. William C. Carroll, Jr.</p> <p>25 Q. Have you ever provided -- or have you ever been</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. What were the accusations?</p> <p>2 A. Some police department issues about the</p> <p>3 integrity and the sanctity of what they were doing,</p> <p>4 whether or not it was excessive force.</p> <p>5 Q. How long ago was that?</p> <p>6 A. A couple months ago. Several months ago.</p> <p>7 Q. And in what setting did you testify?</p> <p>8 A. With an investigator and FBI agent and a court</p> <p>9 reporter, I believe, or a recorder of record, and that</p> <p>10 was it. I just can't remember if it was under oath or</p> <p>11 not.</p> <p>12 Q. How did you learn about this case?</p> <p>13 A. Well, it's quite public.</p> <p>14 Q. So did you hear about it on the news?</p> <p>15 A. Internet, the news, people talking. And then</p> <p>16 may I ask which name -- the name of your case you're</p> <p>17 talking about? You said "this case." What's the name of</p> <p>18 it?</p> <p>19 Q. Caster versus Allen.</p> <p>20 A. Caster versus Allen, yes, sir.</p> <p>21 Q. And who contacted you about being a witness in</p> <p>22 this case?</p> <p>23 A. I believe the attorney here did.</p> <p>24 Q. And when would that have been?</p> <p>25 A. Several months ago, best I can tell.</p>

<p style="text-align: right;">Page 10</p> <p>1 Q. Are you represented by counsel?</p> <p>2 A. I am not.</p> <p>3 Q. So what did you do to prepare for this</p> <p>4 deposition?</p> <p>5 A. Nothing much. I talked to the attorney here a</p> <p>6 little bit. That was it.</p> <p>7 Q. And when did you speak with her?</p> <p>8 A. A few days ago, maybe. I can't remember exact,</p> <p>9 but maybe a few days ago, a week.</p> <p>10 Q. And what did you talk about?</p> <p>11 A. Just I have a deposition coming up and please be</p> <p>12 here at this time, and they may ask you a few questions</p> <p>13 pertaining to this.</p> <p>14 Q. Pertaining to what?</p> <p>15 A. Your memories of, you know, places that you've</p> <p>16 been and the way life is in the City of Mobile compared</p> <p>17 to everywhere else.</p> <p>18 Q. How long was that conversation?</p> <p>19 A. Less than an hour.</p> <p>20 Q. Did you speak with anyone other than your</p> <p>21 attorney?</p> <p>22 A. No.</p> <p>23 Q. Did you review any documents?</p> <p>24 A. No.</p> <p>25 Q. All right. What year were you born?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. And then you moved to your current address?</p> <p>2 A. I moved back to Mobile, yes, but I didn't live</p> <p>3 in that current address at that time. But I did move</p> <p>4 back to Mobile.</p> <p>5 Q. And was that in the City of Mobile?</p> <p>6 A. Yes.</p> <p>7 Q. So you've never lived anywhere other than the</p> <p>8 City of Mobile, Tallahassee and then Washington, D.C.,</p> <p>9 for a few months?</p> <p>10 A. That's correct.</p> <p>11 Q. So you've never lived outside of Alabama other</p> <p>12 than --</p> <p>13 A. Tallahassee, D.C.</p> <p>14 Q. Where did you go to high school?</p> <p>15 A. McGill-Toolen.</p> <p>16 Q. And that's in the City of Montgomery?</p> <p>17 A. Mobile.</p> <p>18 Q. City of Mobile. I apologize. And is that a</p> <p>19 Catholic school?</p> <p>20 A. Yes, it is.</p> <p>21 Q. Are you Catholic?</p> <p>22 A. I am.</p> <p>23 Q. Did you attend school with people who lived</p> <p>24 outside of the City of Mobile?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 A. 1969.</p> <p>2 Q. And where do you live?</p> <p>3 A. Mobile, Alabama.</p> <p>4 Q. In the City of Mobile?</p> <p>5 A. Yes, sir.</p> <p>6 Q. What is your address?</p> <p>7 A. 254 South Broad Street, Mobile, Alabama 36603.</p> <p>8 Q. How long have you lived there?</p> <p>9 A. 22 or 23 years.</p> <p>10 Q. At that address?</p> <p>11 A. Yes.</p> <p>12 Q. Where did you live before that?</p> <p>13 A. College, and my residence of birth was 508</p> <p>14 Augusta Street, which I was there until college.</p> <p>15 Q. And that is in the City of Mobile?</p> <p>16 A. Yes, Mobile, Alabama 36603. It's about six</p> <p>17 blocks from where I live now.</p> <p>18 Q. So when you were born, you lived in the City of</p> <p>19 Mobile?</p> <p>20 A. Yes.</p> <p>21 Q. And then you moved to go to college?</p> <p>22 A. Lived in Tallahassee for college. That was five</p> <p>23 years. I had a stint in Washington, D.C., where I was</p> <p>24 interning during college. That was '89, '90, and that</p> <p>25 was basically it.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Where did they live?</p> <p>2 A. Mount Vernon, Citronelle, Bayou La Batre,</p> <p>3 Irvington. I mean, the archdiocese is pretty big.</p> <p>4 Q. Did you have any classmates who lived in Baldwin</p> <p>5 County?</p> <p>6 A. Yes.</p> <p>7 Q. And where did you attend middle school?</p> <p>8 A. St. Mary's.</p> <p>9 Q. Is that a Catholic middle school?</p> <p>10 A. Yes.</p> <p>11 Q. In the City of Mobile?</p> <p>12 A. Yes.</p> <p>13 Q. And did you attend middle school with students</p> <p>14 who live outside of the City of Mobile?</p> <p>15 A. Yes, sir.</p> <p>16 Q. From what all areas?</p> <p>17 A. Probably Baldwin County and surrounding cities.</p> <p>18 Some were even from outside of the country just getting</p> <p>19 into the United States, Vietnam and a couple of other</p> <p>20 places. I started at St. Mary's in '76. There were a</p> <p>21 couple of Lebanese that came in, too.</p> <p>22 Q. So did you have classmates who lived in the</p> <p>23 Black Belt?</p> <p>24 A. That were from the Black Belt, yes, not living</p> <p>25 at that time.</p>

<p style="text-align: right;">Page 14</p> <p>1 Q. When you say "from the Black Belt," what do you 2 mean? 3 A. Eutaw, Greene County, Conecuh County, Butler, 4 places like that where their families moved to Mobile. 5 Q. I'm sorry. When you said they were from the 6 Black Belt, do you mean their families were from there 7 but moved to -- 8 A. Right, they moved to Mobile at the time and 9 became classmates of mine as we were growing up. 10 Q. And you said you're Catholic? 11 A. I am. 12 Q. Where is your church located? 13 A. Prince of Peace. It's 454, I want to say -- 14 God. It's 454 Charleston. I don't know if it's east or 15 west, but it's 454 Charleston Street, Mobile, Alabama 16 36603. 17 Q. And is there a large Catholic population in 18 Mobile? 19 A. Yes, extensive. Probably largest denomination 20 here. 21 Q. Is that common for Alabama? 22 A. I would say it's common for Mobile, being that 23 it was founded by, you know, Catholic-bearing countries 24 at the time. I can't say for the whole state. 25 Q. So what significance did it have to you going to</p>	<p style="text-align: right;">Page 16</p> <p>1 difference, especially when you're learning to fight your 2 fights and resolve your differences. You know, you meet 3 their family, they meet yours, and you just develop a 4 huge extended family. 5 Q. So are you still close to anyone you went to 6 middle school or high school with? 7 A. Yes. 8 Q. Roughly, how many people? 9 A. I couldn't tell you, but lots. I was a football 10 player, too, basketball player, track guy, went to 11 college on a football scholarship. So, yes, still very 12 team oriented. 13 Q. Where do those friends live now? 14 A. Some Mobile, some outside the city, some other 15 places, but I still have an extended friend base here in 16 Mobile, my friends from high school and grade school that 17 we occasionally talk. 18 Q. So do some of them live within Mobile County but 19 outside of the city? 20 A. Yes, some do. 21 Q. And do you go visit them ever? 22 A. I wouldn't say I go visit them. I normally see, 23 you know, a few of them on fishing trips, I would say, or 24 on get-togethers more so than going by the house. It's 25 more of an activity thing when I see them.</p>
<p style="text-align: right;">Page 15</p> <p>1 a Catholic school growing up? 2 A. Well, you get a firm basis in religion and a 3 solid foundation, but the best thing is that you go to 4 school with a certain group of kids from kindergarten to 5 12th grade, that's 32 that you know your whole life 6 that's a strong bond, almost like immediate family. Now 7 the residual from that in high school is that you meet 8 all the other kids you've been dealing with for 12 years. 9 So it's a real strong family effect even after college -- 10 after high school growing up. It's a big base here. I 11 mean, there's not a friend or classmate that I wouldn't 12 recognize on the street that I wouldn't talk to even if 13 we were opposed to each other in high school, so a huge 14 family effect. 15 Q. So attending Catholic school, was that important 16 to your upbringing? 17 A. I would say when you're growing up, you don't 18 realize what you have. When you become an adult, you 19 realize the basis that the education gave you but, also, 20 the extended family that you have based on the way you 21 came up together and were educated together. 22 Q. When you say "the way you came up together," 23 what do you mean by that? 24 A. Well, when you're with a group of kids every 25 day, eight hours a day for 12 years, it makes a big</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Where do you go on fishing trips? 2 A. Me? I like to go up and down the river. 3 Sometimes we go deep-sea fishing, but I'm not really big 4 on it. I used to go twice a year. Now, I might go once 5 every other year. 6 Q. And which river are you referencing? 7 A. Dog River and Fowl River. 8 Q. Where are those rivers located? 9 A. Dog River is in the city of Mobile. Fowl River 10 is in the county, and depending where the city limits 11 line is, the bay -- you know, Mobile Bay. 12 Q. And when you go deep-sea fishing, where do you 13 leave from? 14 A. Oh, the Sportsman Marina in Gulf Shores. I 15 rarely go out of Dauphin Island. 16 Q. And that's in Baldwin County, correct? 17 A. Yes. 18 Q. Where did you attend college? 19 A. Florida A&M University. 20 Q. How far is that from the City of Mobile? 21 A. 248 miles, three and a half hours. 22 Q. And did you graduate? 23 A. I did, a degree in architectural construction 24 engineering. 25 Q. And when was that?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. '93, '92. I can't remember, but it was right up 2 in there somewhere. The years run together in my head 3 now. Sorry. 4 Q. And so since 1992 or 1993, you've been back in 5 the City of Mobile? 6 A. No, sir. I came back here in '94, August of 7 '94. So I was back and forth between D.C. and other 8 things, nothing permanent, just back and forth. But my 9 permanent residence was '94. 10 Q. Did you do any postgraduate education? 11 A. A little bit. 12 Q. And what was that? 13 A. Business, master's. 14 Q. Where at? 15 A. Florida A&M. 16 Q. Was that right after you graduated? 17 A. A little bit, yes, back and forth a little bit. 18 I was trying to do a few other things back then that just 19 didn't manifest. 20 Q. So you did not obtain a degree? 21 A. Not a master's. 22 Q. So are you married? 23 A. I am. 24 Q. Where is your wife from? 25 A. New York. She was -- Long story. She was born</p>	<p style="text-align: right;">Page 20</p> <p>1 A. I would say 29 years. 2 Q. And do you have kids? 3 A. Three. 4 Q. How old are they? 5 A. 28, 23 and 16. Well, you might as well say 6 she's 17. She'll be 17 October 13th. 7 Q. And does she attend a Catholic school? 8 A. They all did, yes. 9 Q. And was it in the City of Mobile? 10 A. Yes, sir. 11 Q. Did they attend Catholic school with students 12 who lived outside of the City of Mobile? 13 A. I'm pretty sure some did, yes. 14 Q. Would that include Baldwin County? 15 A. Yes, it would. 16 Q. Would that include students who lived in the 17 Black Belt? 18 A. I can't answer that because I don't know their 19 total -- you know, I don't know the total enrollment, and 20 I don't know where every kid was from. 21 Q. Do they have friends who lived there? 22 A. Yes. 23 Q. In the Black Belt? 24 A. Yes. 25 Q. So would they commute to Mobile?</p>
<p style="text-align: right;">Page 19</p> <p>1 in Haiti, grew up in New York, moved to Fort Lauderdale. 2 I met her in Tallahassee. 3 Q. Is she Catholic? 4 A. She is. 5 Q. Was she raised Catholic? 6 A. She was. 7 Q. Did she attend a Catholic school as well? 8 A. St. Joachim in grade school and middle school, 9 and I think she, because of the way she traveled, she 10 attended various different high schools. Don't know 11 which ones in New York, but I know she attended Dillard 12 in Fort Lauderdale. 13 Q. So going back, what did you do when you were in 14 D.C.? 15 A. Worked on Capitol Hill for the AOC under the 16 favor of Richard Gephardt. AOC is the architect at the 17 capitol. 18 Q. So what exactly were you doing? 19 A. Well, the first year, I was learning structure 20 of the capitol buildings and what was needed to make sure 21 that they were restored. The second year, I went over to 22 the senate side learning how to manage and maintain 23 employees and physical structures and all those things 24 dealing with capitol building improvements. 25 Q. How long have you been married?</p>	<p style="text-align: right;">Page 21</p> <p>1 A. No. They have friends that live in the Black 2 Belt because of my affiliation with friends that we have 3 of families there. 4 Q. I'm sorry. Do they have friends who they went 5 to school with? 6 A. I can't confirm that. 7 Q. So where were your children's friends from? 8 Where did they live? 9 A. I would say Mobile, the surrounding cities and 10 Baldwin County and possibly some from Mississippi. I 11 don't know. Flukers (phonetic) was from Mississippi, but 12 that's a little ahead of William, but he was still 13 friends with him because of the McGill-Toolen football 14 thing. He's way ahead of William, now that I think of 15 it, but those kids were all friends. 16 It's funny how the Catholic system works. Your 17 CYO is so entrenched that you're affiliated with 18 everybody and meet everybody. Especially if you guys 19 grew up Catholic, you know what I'm talking about. 20 You're smiling, so I see you can relate. 21 Q. So did you travel to Baldwin County with your 22 kids a lot when you were growing up? 23 A. When they were growing up, yes. I mean, the CYO 24 is large, so you have to play other Catholic schools. I 25 was a coach, so we played other schools over there. So</p>

<p style="text-align: right;">Page 22</p> <p>1 we were over there quite a bit.</p> <p>2 Q. Where else did you go for games?</p> <p>3 A. Well, when I was coaching AAU, all over the</p> <p>4 country.</p> <p>5 Q. And that was basketball?</p> <p>6 A. Basketball, yes.</p> <p>7 Q. How long did you coach AAU?</p> <p>8 A. Oh, God, a long time. More than 16 years, I</p> <p>9 would think.</p> <p>10 Q. Do you still coach any sports teams?</p> <p>11 A. Not right now I'm not, but I keep all of my</p> <p>12 stuff up to date just in case.</p> <p>13 Q. Are you a member of any professional</p> <p>14 organizations?</p> <p>15 A. That's a loaded question. I would say no. It</p> <p>16 depends on what you call professional organizations.</p> <p>17 Q. What does that term mean to you?</p> <p>18 A. If you're asking me if I'm a member of the</p> <p>19 National Association of Black Engineers, no. If you're</p> <p>20 asking me if I'm PMI or PMP, no. If you're asking me if</p> <p>21 I'm CMAA, no. You know, so I'm just saying no.</p> <p>22 Q. What type of -- Are you involved with any</p> <p>23 volunteer groups?</p> <p>24 A. Yes.</p> <p>25 Q. Which ones?</p>	<p style="text-align: right;">Page 24</p> <p>1 say my job, that's what I'm thinking about. But as an</p> <p>2 elected official outside of that, do I travel around the</p> <p>3 city, is that what you're asking, because of the</p> <p>4 contracting or because of the elected position?</p> <p>5 Q. No, just any other types of community</p> <p>6 involvement that you do.</p> <p>7 A. Yeah. I'm a member of the Home Builders</p> <p>8 Association, member of the Prince of Peace giving -- I</p> <p>9 don't even know what they call it, giving where we do the</p> <p>10 food drives. I can't -- It's so loaded in my head. I</p> <p>11 just know what I do. I've never been asked to define it</p> <p>12 all.</p> <p>13 Q. So I believe you said, other than being a member</p> <p>14 of the city council, you have a different job?</p> <p>15 A. Yeah. I'm a builder.</p> <p>16 Q. What exactly do you build?</p> <p>17 A. Houses, buildings, whatever is necessary.</p> <p>18 Q. Do you have your own business?</p> <p>19 A. I do.</p> <p>20 Q. Where do you build houses, buildings?</p> <p>21 A. Here in the city but the State of Alabama. You</p> <p>22 know, we have a license in Huntsville. We have a city</p> <p>23 license here. So we just build where we have an</p> <p>24 opportunity.</p> <p>25 Q. Is most of your work in the City of Mobile,</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Where do I start? CYO.</p> <p>2 Q. What is that?</p> <p>3 A. Catholic Youth Organization. I don't coach</p> <p>4 anymore, but I'm still very involved, still a member of</p> <p>5 the Yellow Jacket Club at McGill-Toolen.</p> <p>6 Q. What is that?</p> <p>7 A. That is a support system for McGill-Toolen</p> <p>8 football.</p> <p>9 Q. What do you do as part of that?</p> <p>10 A. Nothing, just go to the meetings and do what I'm</p> <p>11 asked. I currently serve on the theater board for</p> <p>12 Sunnyside Academy -- I mean Sunnyside Services. It's a</p> <p>13 theater system or -- what do they call them -- theater</p> <p>14 guild. I'm on his board of directors. He's trying to</p> <p>15 build a theater. God, I can't even start to tell you all</p> <p>16 the running around I do, but, yeah, several.</p> <p>17 Q. Where all do you travel for these volunteer</p> <p>18 groups?</p> <p>19 A. Just right around the City.</p> <p>20 Q. Do you have any other sorts of community</p> <p>21 involvement apart from your job?</p> <p>22 A. I'm an elected official, so, yes.</p> <p>23 Q. Aside from that, just in your personal capacity.</p> <p>24 A. I'm a contractor by trade, project manager,</p> <p>25 program manager, developer type of thing. So when you</p>	<p style="text-align: right;">Page 25</p> <p>1 though?</p> <p>2 A. 90 percent of it.</p> <p>3 Q. Is there any in Mobile County but outside of the</p> <p>4 city?</p> <p>5 A. Do we have any work in Mobile County and outside</p> <p>6 of the city?</p> <p>7 Q. Yes.</p> <p>8 A. Not right now, but we were under contract in</p> <p>9 Brewton with Alabama State, Southern Normal, and we're</p> <p>10 trying to close another contract in Brewton right now</p> <p>11 with Alabama State, just a maintenance contract.</p> <p>12 Q. And so you're also a member of the Mobile City</p> <p>13 Council?</p> <p>14 A. I am.</p> <p>15 Q. Do you know Councilman C.J. Small?</p> <p>16 A. I do.</p> <p>17 Q. How well do you know him?</p> <p>18 A. I would say pretty well, I mean, well enough</p> <p>19 that we talk back and forth, you know.</p> <p>20 Q. Do you think he's knowledgeable about the City</p> <p>21 of Mobile?</p> <p>22 A. I would think so.</p> <p>23 Q. Do you think he knows his district pretty well?</p> <p>24 A. I would think so.</p> <p>25 Q. Do you think he knows his constituents and their</p>

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1 interests?

2 A. Yeah. And he's been in office now, what?

3 Almost 12 years. So I would think so.

4 Q. So when did you first join the city council?

5 A. Ran for office first in '05 and served two terms

6 until '13. My mother got sick, and I left, and I ran

7 again in '20 and won again.

8 Q. So were you running your construction business

9 the first time that you took office?

10 A. I did.

11 Q. And were you running it in the interim as well?

12 A. No. I stopped the home building business

13 because of the bad economy in 2010, closed it down,

14 dissolved it, bankrupt it. And then I worked -- God, I

15 forgot about this -- worked in Houston from 2012 to, I

16 want to say, '16 or '17.

17 Q. Worked in where?

18 A. Houston, Texas.

19 Q. Did you live there?

20 A. My principal residence was here, but I was out

21 there at least three or four days a week. So if you want

22 to consider it living in Houston at that time, I was

23 there.

24 Q. And what were you doing in Houston?

25 A. Building commercial buildings, program managing

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1 for the Houston Community College system, HCC, ran a

2 500-million-dollar bond issue for them as a scheduler,

3 cost estimating, programmer for design work.

4 Q. And what made you go to Houston?

5 A. Well, I mean, the economy was slow. I wanted to

6 keep the business going. We partnered with P2NG

7 (phonetic). We opened an office here and had an office

8 in Houston. So when we won that bond issue, I was needed

9 in Houston more than I was needed here, so I needed to go

10 back and forth.

11 Q. Why did you decide to run for city council the

12 first time?

13 A. There was quite a bit going on across the street

14 from the house that I built in, I want to say, '02 and

15 had some prostitutes, drug deals going on, people running

16 up and down the street, crime going on, and I asked the

17 councilman to help me fix it. Somewhere along the line,

18 I think he told me he couldn't do very much and I had to

19 talk to the administration. I just got tired of it one

20 day and said, Okay, I think I'm going to run for office.

21 I ran for office and won and started the process of

22 cleaning up that place across the street.

23 Q. Did you have an opponent when you ran for

24 office?

25 A. Yes, the incumbent, Thomas Sullivan. That was

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1 in 2005.

2 Q. And are the city council elections nonpartisan?

3 A. They are.

4 Q. Do you know what political party your opponent

5 belonged to?

6 A. Democrat.

7 Q. And what was his race?

8 A. Black.

9 Q. How did the campaign go against him?

10 A. It was hard fought.

11 Q. Was it cordial?

12 A. Until the runoff.

13 Q. And so why did you have to go to a runoff?

14 A. Because no one candidate got more than 51

15 percent of the vote.

16 Q. And do you know the vote breakdown after the

17 runoff, roughly?

18 A. In 2005, I don't remember.

19 Q. Do you roughly remember?

20 A. Maybe 51/48, 51/50. I don't know. I think I

21 won by a couple hundred votes.

22 Q. Was anyone else running aside from him?

23 A. That year, it was Johnny Burroughs, Jeffrey

24 Jones, Thomas Sullivan and myself. I don't remember

25 anyone else, if there was.

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1 Q. And when you were running for office, did you

2 speak to white and black constituents?

3 A. Yes. Municipal elections are nonpartisan, so

4 you have to have common grounds with both ideologies.

5 Q. So I asked about white and black, and you

6 answered with -- you say you need common ground for both

7 ideologies. Why did you conflate -- not to use that

8 term, go to partisanship?

9 A. Define -- You're asking me why did I assume

10 partisanship?

11 Q. Yes, because my question was did you speak with

12 white and black.

13 A. I did, and I agree. The City of Mobile, so many

14 times people associate whites with Republicans and blacks

15 with Democrats, but in our city, you've got to remember,

16 we have large pockets that are white Democrats mixed in

17 with black Democrats, and then you have large pockets of

18 Republicans, also. The inner city is pretty blue, but

19 once you get outside the I-65 corridor, it's very red.

20 Q. Do you know the racial demographics of your city

21 council district?

22 A. 62 to, what is that? 38.

23 Q. And so you represent council district two,

24 correct?

25 A. That's right.

<p style="text-align: right;">Page 30</p> <p>1 Q. And when you first held office, was that also</p> <p>2 council district two?</p> <p>3 A. Yes.</p> <p>4 Q. And so when you were speaking to constituents,</p> <p>5 did black and white voters treat you the same way?</p> <p>6 A. Some areas, yeah. Most areas in district two, I</p> <p>7 would say, but some areas, no.</p> <p>8 Q. Some areas, no?</p> <p>9 A. Some areas, no.</p> <p>10 Q. Were you treated worse by --</p> <p>11 A. I wouldn't say worse, but credibility kind of</p> <p>12 wanes off.</p> <p>13 Q. In which -- with which?</p> <p>14 A. It lessens.</p> <p>15 Q. Which race?</p> <p>16 A. Whites.</p> <p>17 Q. And why do you believe that you have less</p> <p>18 credibility with white voters?</p> <p>19 A. It's how they talk and respond to your answers</p> <p>20 and the stances that you have and the principles that you</p> <p>21 present. So a lot of times you find that they don't have</p> <p>22 or stand on the same ideology that you do, or their</p> <p>23 principles may be a little different.</p> <p>24 Q. So how many times have you ran for election as a</p> <p>25 city councilman?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. No.</p> <p>2 Q. And did you hold any other elected positions</p> <p>3 before --</p> <p>4 A. No.</p> <p>5 Q. Could you describe your responsibilities as a</p> <p>6 city councilman?</p> <p>7 A. Well, we're the legislative branch of the city,</p> <p>8 so our responsibilities are to manage legislation, review</p> <p>9 all the contracts, review all the resolutions and</p> <p>10 ordinances that the city has or that the mayor presents</p> <p>11 and those that we as councilmembers write and present</p> <p>12 ourselves.</p> <p>13 Our constituency base likes to call us a lot</p> <p>14 about streets, roads, you know, paving issues that need</p> <p>15 to be repaired, but those are administrative issues. All</p> <p>16 I can do is forward those to the administration and</p> <p>17 request they get done as quickly as possible.</p> <p>18 I keep the community informed with what's going</p> <p>19 on with the city through district meetings and</p> <p>20 newsletters and other correspondence.</p> <p>21 Q. What are your top priorities as a city</p> <p>22 councilman? What issues?</p> <p>23 A. Right now, today? Revitalization of</p> <p>24 under-served neighborhoods right now is my top priority.</p> <p>25 Q. And what do you mean by that?</p>
<p style="text-align: right;">Page 31</p> <p>1 A. One, two, three.</p> <p>2 Q. So in your -- The second time you ran for city</p> <p>3 council, what year would that have been?</p> <p>4 A. '09.</p> <p>5 Q. Did you have an opponent?</p> <p>6 A. I did, Lakeshia Dotson, and there was one other,</p> <p>7 and I can't remember -- I don't know if they stayed in</p> <p>8 the race or dropped out, but I remember Lakeshia Dotson</p> <p>9 staying in.</p> <p>10 Q. And what was her race?</p> <p>11 A. She's black.</p> <p>12 Q. Do you remember the race of the other --</p> <p>13 A. No.</p> <p>14 Q. Do you remember any racial appeals?</p> <p>15 A. No.</p> <p>16 MS. RUTAHINDURWA: Object to the form.</p> <p>17 Q. You said no, correct?</p> <p>18 A. What did you say?</p> <p>19 MS. RUTAHINDURWA: I objected to form, but you</p> <p>20 can answer.</p> <p>21 A. No, I don't.</p> <p>22 Q. Do you know the political parties of either of</p> <p>23 your opponents in that election?</p> <p>24 A. She was a Democrat.</p> <p>25 Q. And you don't remember the other one?</p>	<p style="text-align: right;">Page 33</p> <p>1 A. There's neighborhoods in the city that have been</p> <p>2 overlooked for 50 years or better that are primarily</p> <p>3 minority neighborhoods that haven't gotten the attention</p> <p>4 that other parts of the city have. They're in the older</p> <p>5 part of the city where structure is crumbling, the houses</p> <p>6 are falling down. The people that live there are</p> <p>7 extremely poor, in some cases. Some are at the</p> <p>8 attainable level, but you barely have anybody that's at</p> <p>9 the affordable level over there. So it's a task, and</p> <p>10 it's set in the central part of our city, if you ask me,</p> <p>11 and we have been overlooking the need to revitalize those</p> <p>12 neighborhoods for a long time.</p> <p>13 Q. And what would be the benefit of revitalizing</p> <p>14 those neighborhoods?</p> <p>15 A. Well, if you start revitalizing those</p> <p>16 neighborhoods and give them the care they need, you're</p> <p>17 going to reduce the crime rate in places. You're going</p> <p>18 to increase property value. You're going to have a</p> <p>19 resurrection of people inside the city limits rather than</p> <p>20 losing people. You're going to increase the tax base of</p> <p>21 the city. You're going to breathe additional life into</p> <p>22 the city.</p> <p>23 Q. So why is it bad to lose people in the city?</p> <p>24 A. When you lose people in the city, you lose</p> <p>25 revenue. I mean, people spend money, and every time you</p>

<p style="text-align: right;">Page 34</p> <p>1 lose revenue -- and that's on all levels. That's on 2 sales tax level. That's on the ability to gain grants 3 and other things from the federal government. That's on 4 HUD dollars based on census count. You lose at all 5 levels when you lose people in the city, no matter what 6 they look like. But we're losing a lot of people. I 7 think, on average, we're losing about 2800 people a year. 8 Q. So you talk about federal grants. What does the 9 city receive federal grants for? 10 A. Well, you're talking about HUD and all kinds of 11 other grants that the city may apply for. And you have 12 to remember that grants are competitive, so you're 13 competing for those based on need and based on 14 population, based on whatever your base is. 15 Q. And since you've been a city councilman, what 16 has the city used grants for? 17 A. So much. I think maintenance vehicles. I think 18 we got some type of truck in the past. We've helped with 19 the fire department on grants. We've got specialized 20 park grants that we've gotten for infrastructure and new 21 parks. So quite a bit. 22 Q. And as a member of the city council, do you 23 advocate for the city to get these grants? 24 A. When I have the opportunity to, yes, I will or I 25 do, or based on whether or not the mayor needs the city</p>	<p style="text-align: right;">Page 36</p> <p>1 I only had, when I was in office the last time, a 2 relationship with Palmer Hamilton, which gave me a 3 relationship with Richard Shelby. So I don't know what 4 Jerry Carl has done. 5 Q. Who is Palmer Hamilton? 6 A. He was a local lobbyist, lawyer with Jones, 7 Walker, Miller, Hamilton. 8 Q. And before revitalization, what were your 9 priorities then? 10 A. Assuring that our neighborhoods were taken care 11 of, my district was taken care of, trying to make sure we 12 did things to the best of our ability to, you know, hold 13 down the crime and hold the mayor accountable for 14 maintaining and making sure we got the resources that we 15 needed. 16 Q. And revitalization, would that assist the City 17 of Mobile's economy? 18 A. Yes. 19 Q. Does the whole county benefit when the City of 20 Mobile's economy is doing well? 21 A. So goes Mobile, so goes the State of Alabama, 22 not just Mobile County. You've got to remember, we have 23 the port here. 4.2 billion dollars in industry every 24 year goes all up and down our waterways and transported 25 everywhere. So when Mobile is strong, the state is</p>
<p style="text-align: right;">Page 35</p> <p>1 council to approve him and move forward with the 2 application process, yes. 3 Q. What all goes into whether the city gets a 4 grant? 5 A. Well, I don't write them, so I don't know what 6 goes into them. I haven't written a grant, so I don't 7 know, but I think it's a big effort. We also got the 8 Tiger Grant, too, which is an infrastructure grant that 9 goes through the heart of the more depressed areas, which 10 is lower MLK. 11 Q. And -- 12 A. I had to go back and add that because you asked 13 me what other grants did we have. That's a big grant. 14 Q. What grant was that? 15 A. Tiger Grant. 16 Q. What was that? 17 A. Shoot, I can't even define it for you, but it's 18 infrastructure improvement money that we used to improve 19 the streets and sidewalks and it will restore the street 20 on Martin Luther King Avenue. 21 Q. Does the congressman, the United States 22 congressman who represents the City of Mobile, does he or 23 she assist the City in receiving those grants? 24 A. I haven't talked to Jerry Carl very much. So I 25 can't answer that. I don't know what he's assisted with.</p>	<p style="text-align: right;">Page 37</p> <p>1 strong. 2 Q. Does Baldwin County also benefit? 3 A. Of course. 4 Q. Does Black Belt counties benefit? 5 A. Of course. 6 Q. Does Mobile County benefit more than Black Belt 7 counties? 8 A. I would say that, but let me give you a prime 9 example. Mobile invested in TK several years ago. We 10 invested 33-and-a-half-million dollars in TK, and that is 11 up in Axis, Alabama, and that's above -- right there up 12 around Mount Vernon. So with that being at Mount Vernon, 13 you're getting people not just from Mobile County, but 14 you're getting people from Washington County, Conecuh 15 County and all these other counties that have an 16 opportunity to maintain employment right here in Mobile. 17 These are counties that are leading into the Black Belt, 18 and you may have people driving down also. But you also 19 have the ability for other smaller companies to come in 20 and work at these plants when they were being built 21 because of Mobile's investment of 33-and-a-half-million 22 dollars. I want to say that was somewhere between 2005 23 and 2010 or '12. I can't remember the exact date when 24 that investment -- No. It was in my first year in 25 office. I want to say we made that investment somewhere</p>

<p style="text-align: right;">Page 38</p> <p>1 between 2005 and 2009.</p> <p>2 And when Mobile continues to make investments</p> <p>3 like that in large corporations that are centralized,</p> <p>4 then you're getting the ability to draw people from</p> <p>5 everywhere else. We have people that come from Baldwin</p> <p>6 County every day and work at Airbus and Austal. And</p> <p>7 these are Mobile incentives where our chamber is bringing</p> <p>8 those in and our dollars are impacting those industries.</p> <p>9 So does it help the Black Belt and people living</p> <p>10 up there? I would say, yes. That one investment did up</p> <p>11 there.</p> <p>12 Q. And so when you say "the Black Belt," what are</p> <p>13 you referencing?</p> <p>14 A. I'm referencing a string of counties that go</p> <p>15 from Mississippi over to Georgia that make up the Black</p> <p>16 Belt, and I would say that they call it the Black Belt</p> <p>17 because of the type of soil it had, and it was the</p> <p>18 growing section of the State of Alabama.</p> <p>19 Q. And what all counties are in the Black Belt?</p> <p>20 A. I can't even name them anymore, but there are</p> <p>21 quite a lot of them. I would say from Greene County over</p> <p>22 to Pike; is that right? Greene County being the</p> <p>23 westernmost up against Mississippi and going all the way</p> <p>24 over to the other side of the county is a big stretch.</p> <p>25 Q. So which counties do you consider to be part of</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. What about Clarke County?</p> <p>2 A. No.</p> <p>3 Q. Do you know where Monroe County is?</p> <p>4 A. That's Monroeville. I want to say it's nine.</p> <p>5 Q. What about Conecuh County?</p> <p>6 A. It's right -- 65. Yeah, I know where it is if</p> <p>7 I'm driving it, but I can't point it out on this map</p> <p>8 right now, but, yeah, I know where they are.</p> <p>9 Q. What about Sumter County?</p> <p>10 A. No, I don't know where that is. Choctaw County</p> <p>11 is just to the north of the other one.</p> <p>12 Q. Which one?</p> <p>13 A. It should be just to the north of -- I think</p> <p>14 it's just to the north of Washington County. It's</p> <p>15 Baldwin, Mobile, Washington. Atmore is in Escambia. So</p> <p>16 it's Baldwin, Mobile, Washington, Atmore, Conecuh.</p> <p>17 Escambia is to the right, and then it's Choctaw, Marengo.</p> <p>18 I can't remember Demopolis. Demopolis, Greene, and then</p> <p>19 you start coming across the center.</p> <p>20 Q. Do you know what number Choctaw is?</p> <p>21 A. I'm just going in my mind how they go up top. I</p> <p>22 can't remember the order.</p> <p>23 Q. And so do you know where Macon County is on that</p> <p>24 map, the number?</p> <p>25 A. It's Tuskegee.</p>
<p style="text-align: right;">Page 39</p> <p>1 the Black Belt that you can recall?</p> <p>2 A. Marengo, Greene, Washington, Russell, Butler. I</p> <p>3 can't name them anymore -- Conecuh, Escambia. I would</p> <p>4 say once you start getting above Mobile and going</p> <p>5 across -- did I say Russell?</p> <p>6 Q. Yes, you did.</p> <p>7 A. I'm trying to look at the map, but, yes.</p> <p>8 Q. Well, we can give you a map to look at. I'll</p> <p>9 show you what we'll mark as Exhibit 1.</p> <p>10 (Exhibit 1 was marked for identification.)</p> <p>11 Q. I'll represent this is a map of Alabama</p> <p>12 counties.</p> <p>13 A. I would start --</p> <p>14 Q. Well, I'll ask you a question. So do you know</p> <p>15 where Mobile County is on this map?</p> <p>16 A. Yes.</p> <p>17 Q. What number is it?</p> <p>18 A. One.</p> <p>19 Q. Do you know where Baldwin County is?</p> <p>20 A. Two.</p> <p>21 Q. Washington County?</p> <p>22 A. Seven.</p> <p>23 Q. Escambia?</p> <p>24 A. It's right above us. Brewton is to my right, so</p> <p>25 it's three.</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Do you know what number it would be on that map?</p> <p>2 A. No. It's over here to the right. I know it</p> <p>3 would be just south and east of Montgomery County, and I</p> <p>4 can't even tell you what it looks like on this map right</p> <p>5 now.</p> <p>6 Q. Do you know what number Montgomery County is?</p> <p>7 A. I can't tell you what it looks like on this map</p> <p>8 right now.</p> <p>9 Q. Do you know what number Bullock County is?</p> <p>10 A. No.</p> <p>11 Q. Russell County?</p> <p>12 A. No.</p> <p>13 Q. Barbour County?</p> <p>14 A. No.</p> <p>15 Q. I'm going to show you a video. One second.</p> <p>16 A. I haven't had to do that exercise in so long.</p> <p>17 Q. So we'll mark this as Exhibit 2.</p> <p>18 (Exhibit 2 was marked for identification.)</p> <p>19 Q. I'll play this video for you and you tell me if</p> <p>20 you remember what it is.</p> <p>21 (Whereupon, Exhibit 2, a video was played.)</p> <p>22 Q. All right. Do you recognize that video?</p> <p>23 A. Yeah.</p> <p>24 Q. And was that you speaking?</p> <p>25 A. Yeah.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. You agreed to that interview, correct?</p> <p>2 A. Yes.</p> <p>3 MR. MAULDIN: I will publish that as Exhibit 2.</p> <p>4 Q. So in that interview, you said, "So Mobile goes,</p> <p>5 so goes the region."</p> <p>6 A. Right.</p> <p>7 Q. What did you mean by "the region"?</p> <p>8 A. Well, like I just said a few minutes ago, I</p> <p>9 mean, Mobile's economic base is huge. So when our</p> <p>10 economy is strong, the regional economy is strong.</p> <p>11 Everybody feels the effect of what happens here.</p> <p>12 Q. What did you mean by "the region" in that video?</p> <p>13 A. I'm talking about the metropolitan region of the</p> <p>14 Mobile, Baldwin, Escambia County areas where people feel</p> <p>15 the influence of this economy and what happens here in</p> <p>16 Mobile. I think it feeds the region.</p> <p>17 Q. And so do you think Mobile's economy affects</p> <p>18 those -- like the region that you just referenced more</p> <p>19 than other parts of Alabama?</p> <p>20 A. Well, let me say this to you: Mobile's budget</p> <p>21 is, I would say, just a little north of 300 million</p> <p>22 dollars a year. Prichard's budget is probably less than</p> <p>23 60 million dollars a year. Saraland's budget may be 80,</p> <p>24 90 million dollars a year, maybe 100. Chickasaw's budget</p> <p>25 is very low, just the same.</p>	<p style="text-align: right;">Page 44</p> <p>1 farming, they're going to be strongest in the Black Belt.</p> <p>2 You know, if you're looking for white-collar jobs,</p> <p>3 there's more white collar-jobs and opportunities in</p> <p>4 Mobile than anywhere else. So I'm sure there are some</p> <p>5 people that actually drive, make that drive from</p> <p>6 somewhere in one of those counties, Monroe County,</p> <p>7 Conecuh County, Evergreen, Escambia, Atmore, they're</p> <p>8 driving here every day for a job opportunity and driving</p> <p>9 back, you know. So I'm sure Mobile is putting a lot of</p> <p>10 life up there.</p> <p>11 Q. Do you have personal knowledge of people that</p> <p>12 make the commute from those counties?</p> <p>13 A. I know a few nurses that do, that work at either</p> <p>14 USA or Mobile Infirmary.</p> <p>15 Q. What counties do they commute from?</p> <p>16 A. I think Monroeville. I don't think. I know. I</p> <p>17 know. They live -- One is in Frankfort, I think, and the</p> <p>18 other -- God, I can't name the city, but it's in Monroe</p> <p>19 County. Franklin. I think it's Franklin. Franklin, not</p> <p>20 Frankfort. I think it's Franklin.</p> <p>21 Q. And do you know anyone who commutes to work in</p> <p>22 Mobile from Butler County?</p> <p>23 A. No, I can't say that I do.</p> <p>24 Q. Pike County?</p> <p>25 A. Can't say that I do.</p>
<p style="text-align: right;">Page 43</p> <p>1 So when people need things and their tax dollars</p> <p>2 are spent and they need to purchase things, they're</p> <p>3 coming to Mobile to get what they need. They're coming</p> <p>4 here to find their resources. They're working inside of</p> <p>5 our city limits. So when you say is Mobile's economy is</p> <p>6 stronger than most of the other cities in the region,</p> <p>7 yes, because this is where people are working, this is</p> <p>8 where people are buying, buying the things they need, and</p> <p>9 this is where people are getting the resources they need</p> <p>10 to make their areas go.</p> <p>11 So, yes, Mobile's economy is stronger than, I</p> <p>12 would say, other regional counties as far north as -- We</p> <p>13 probably have the strongest economy as far north as when</p> <p>14 you get up to Montgomery.</p> <p>15 Q. So do you think the counties within the region,</p> <p>16 though, depend on Mobile more than counties like</p> <p>17 Montgomery County, Bullock County, Pike County?</p> <p>18 A. Depends on the type of work the people need and</p> <p>19 the people do. You've got to remember, people are driven</p> <p>20 by the type of work they can do. If they're looking for</p> <p>21 blue-collar welders, then they're going to be in Mobile</p> <p>22 welding for Austal or at a shipyard. You're not going to</p> <p>23 go to Montgomery to find that type work. You're not</p> <p>24 going to find that type of work in Monroeville.</p> <p>25 If you're looking for agricultural work and</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. Barbour?</p> <p>2 A. Can't say that I do.</p> <p>3 Q. Bullock?</p> <p>4 A. Can't say that I do, no.</p> <p>5 Q. Macon?</p> <p>6 A. No, I don't know.</p> <p>7 Q. Russell?</p> <p>8 A. I don't know.</p> <p>9 Q. So, as far as you know, the people you know is</p> <p>10 Monroe County?</p> <p>11 A. They're the closer counties. I would say</p> <p>12 Conecuh, Escambia, Washington, maybe a little further</p> <p>13 north than that, around Demopolis, but we have people</p> <p>14 that come here and work every day, especially, I would</p> <p>15 say, more so in our medical industry, now that I think</p> <p>16 about it because of South Alabama -- South Alabama</p> <p>17 extends all over the county now, and so does Mobile</p> <p>18 Infirmary. So I would think there are people that drive</p> <p>19 down here to provide that service as needed.</p> <p>20 Q. But no counties east of Conecuh County?</p> <p>21 MS. RUTAHINDURWA: Object to the form.</p> <p>22 Q. You can answer.</p> <p>23 A. I can't tell you exactly because I don't know.</p> <p>24 I would have to touch the people and know who they are.</p> <p>25 So you're making me guess.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q. No. I'm asking within your knowledge.</p> <p>2 A. Not that I know of personally.</p> <p>3 Q. Do you travel to any of the Black Belt counties?</p> <p>4 A. Oh, God, yeah.</p> <p>5 Q. Which ones?</p> <p>6 A. Greene County. I'm in Monroe a bunch. Matter</p> <p>7 of fact, I just finished an addition in Monroe County at</p> <p>8 Coastal Alabama Community College for Dr. Pouncey just --</p> <p>9 We fish on the Alabama River up there. My mother has</p> <p>10 property in Gosport, Alabama in Grove Hill. I go across</p> <p>11 84 all the time, Perdue Hill, Grove Hill, Silas,</p> <p>12 Thomasville. Yes, I have some exposure up there.</p> <p>13 Q. What counties would those be?</p> <p>14 A. You're asking -- I can't tell you, but I'm in</p> <p>15 the Black Belt quite a bit, and they're probably in the</p> <p>16 closer proximity counties, Greene County, I know. Eutaw,</p> <p>17 E-U-taw. Eutaw is a good place, a lot of fishing on the</p> <p>18 dam up there a little bit. They like to catfish.</p> <p>19 Q. Do you travel to any of the Black Belt counties</p> <p>20 east of Monroe County?</p> <p>21 A. During football a few years ago, yes, Central</p> <p>22 Phenix City, around the Auburn area a little bit, but I</p> <p>23 haven't been over there since my oldest son was heavily</p> <p>24 involved in football and the playoffs and all those</p> <p>25 things on a regular basis.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. May take my wife to the mall or may go down to</p> <p>2 the beach. I may go deep-sea fishing and leave from</p> <p>3 Sportsman's Marina like we talked about earlier.</p> <p>4 Q. What beach do you go to?</p> <p>5 A. Gulf Shores, Navarre, Orange Beach. It depends</p> <p>6 on the day.</p> <p>7 Q. How often do you go to the beaches there?</p> <p>8 A. Not very often.</p> <p>9 Q. How often do you go to the mall in Baldwin</p> <p>10 County?</p> <p>11 A. You've got to ask my wife that. I don't</p> <p>12 remember.</p> <p>13 Q. But you said you go to Baldwin County, I</p> <p>14 believe, a few times a month?</p> <p>15 A. Probably. I mean, I go through there all the</p> <p>16 time. I may not stop, but -- You know, when you ask do I</p> <p>17 go, I mean, I'm telling you when I actually stop. When</p> <p>18 you drive through, it doesn't count.</p> <p>19 Q. Why do you drive through it?</p> <p>20 A. I may go that way to go to Brewton, or I may go</p> <p>21 that way to go to Atmore, just other reasons.</p> <p>22 Q. What county is Brewton in?</p> <p>23 A. Isn't that Escambia County? Isn't it? I don't</p> <p>24 know. Escambia County.</p> <p>25 Q. So why do you go to Brewton?</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. And do you travel to Baldwin County frequently?</p> <p>2 A. I would say average, yeah.</p> <p>3 Q. Average? What do you mean?</p> <p>4 A. I mean, I'm not over there every day, but I'm</p> <p>5 probably over there two or three times a month or four</p> <p>6 times a month. Let's see. Two years ago, I was with the</p> <p>7 Highland Group helping them, so I was over there every</p> <p>8 day.</p> <p>9 Q. What's the Highland Group?</p> <p>10 A. It's another general contracting company.</p> <p>11 They're commercial guys. I was over there helping close</p> <p>12 out two projects. I was in Brewton with them for a year</p> <p>13 helping them close out Provalus, and then I did</p> <p>14 estimating and project management and preconstruction</p> <p>15 services for them for a little while. That's in Foley.</p> <p>16 Q. And the company you referenced, are they based</p> <p>17 in Baldwin County?</p> <p>18 A. Yes.</p> <p>19 Q. And you were working on a project in Baldwin</p> <p>20 County?</p> <p>21 A. No. I was working on a project in Brewton and</p> <p>22 in Monroeville.</p> <p>23 Q. So why do you travel to Baldwin County now?</p> <p>24 A. Just for fun.</p> <p>25 Q. What do you do there?</p>	<p style="text-align: right;">Page 49</p> <p>1 A. We're trying to close a contract with Alabama</p> <p>2 State and Southern Normal. The property is Southern</p> <p>3 Normal. It's in Brewton. It used to be a boarding</p> <p>4 school for minorities.</p> <p>5 Q. How often do you travel there?</p> <p>6 A. Say again.</p> <p>7 Q. How often do you travel to Brewton?</p> <p>8 A. Now, maybe -- It's only been once a month. For</p> <p>9 a while, it was every day. I would say -- This is 2024.</p> <p>10 So '20 was Brewton. So '20, it was probably -- between</p> <p>11 '20 and '23, three, four times a week.</p> <p>12 Q. What is your understanding of the Congressional</p> <p>13 redistricting process?</p> <p>14 A. What do you want to know about my understanding?</p> <p>15 Q. When does it happen?</p> <p>16 A. When?</p> <p>17 Q. Yes.</p> <p>18 A. It's already happened, the Congressional</p> <p>19 redistricting. You talking about district two?</p> <p>20 Q. No, just redistricting in general.</p> <p>21 A. Well, based on the census count that's done</p> <p>22 every 10 years, then we're required to reapportion,</p> <p>23 whether it's at the municipal, state or at the federal</p> <p>24 level, and when the census count tells us that we have</p> <p>25 more of one population in our base, then we have to</p>

<p style="text-align: right;">Page 50</p> <p>1 realign the districts to accommodate that.</p> <p>2 Q. Do you know the population trend in the Black</p> <p>3 Belt of Alabama as of the most recent census?</p> <p>4 A. No, I don't.</p> <p>5 Q. Do you know if it's generally increasing or</p> <p>6 decreasing?</p> <p>7 A. No, I don't, but I would think that the</p> <p>8 population in the Black Belt is more minority than it is</p> <p>9 majority.</p> <p>10 Q. What do you mean by that?</p> <p>11 A. There are more blacks in the Black Belt than</p> <p>12 there are whites.</p> <p>13 Q. And you mentioned earlier people from the Black</p> <p>14 Belt coming to the City of Mobile for work. We talked</p> <p>15 about people commuting. Do people move from the Black</p> <p>16 Belt to Mobile to work?</p> <p>17 A. In my case, I would say no. Some of the</p> <p>18 concrete finishers don't. They come and work as needed.</p> <p>19 You know, the roofers come and go as needed, but nobody</p> <p>20 has really moved here yet, you know, in my immediate</p> <p>21 experience. The two nurses I told you about, they still</p> <p>22 live up there. They just come every day. Oh, wait. I</p> <p>23 was about to lie. A girl I know very well just moved</p> <p>24 here to teach. She's from Greene County. She now</p> <p>25 teaches here and just moved to Mobile from the Black</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. So do you think it hurts the Black Belt's</p> <p>2 economy when people move?</p> <p>3 A. Well, when you don't have the economic base for</p> <p>4 people to work there, it's not hurting anything. You got</p> <p>5 to remember, in order for it to hurt the economy, you've</p> <p>6 got to have something that's driving the economy. In</p> <p>7 order to have something driving the economy, you've got</p> <p>8 to have somebody to get it there, and, really, there's no</p> <p>9 real economy stretching across the Black Belt. You have</p> <p>10 spots. You've got Tuskegee. You have Monroeville. You</p> <p>11 have Central Phenix City. You have these little small</p> <p>12 spots, but you don't really have any drivers. Your</p> <p>13 biggest driver in the Black Belt is the agricultural</p> <p>14 industry, and when you can't do that, you have to find</p> <p>15 somewhere to work.</p> <p>16 Q. I believe you also said earlier that when people</p> <p>17 move out of Mobile, one of the reasons it hurts the city</p> <p>18 is because it loses the tax base.</p> <p>19 A. You lose the tax base, but a lot of times in the</p> <p>20 Black Belt, the people aren't moving out. They're just</p> <p>21 coming here to work. They're spending their money</p> <p>22 somewhere else. They're also spending money while</p> <p>23 they're here, but they're also spending money at home,</p> <p>24 meaning in the city that they're from.</p> <p>25 Q. So are you suggesting that, to your knowledge,</p>
<p style="text-align: right;">Page 51</p> <p>1 Belt.</p> <p>2 Q. Do you know why she moved here?</p> <p>3 A. Need for employment.</p> <p>4 Q. She needed employment?</p> <p>5 A. She needed employment.</p> <p>6 Q. Do you know other people who have moved from the</p> <p>7 Black Belt to the City of Mobile?</p> <p>8 A. From years ago, yes, but not in the recent</p> <p>9 years.</p> <p>10 Q. Do you know why they moved here?</p> <p>11 A. Both better living conditions and better</p> <p>12 employment.</p> <p>13 Q. So do you think it's fair to say that the</p> <p>14 economic opportunities are better in Mobile than the</p> <p>15 Black Belt?</p> <p>16 A. Well, you've got to remember the Black Belt has</p> <p>17 been overlooked for a long time, hasn't been a whole lot</p> <p>18 of dollars spent there. Just look at the school systems</p> <p>19 up there and infrastructure. They have a real need for</p> <p>20 real representation, and somebody's got to get them some</p> <p>21 resources.</p> <p>22 Q. And I believe you said earlier that when people</p> <p>23 move outside of the City of Mobile, it hurts the City of</p> <p>24 Mobile's economy, correct?</p> <p>25 A. It does.</p>	<p style="text-align: right;">Page 53</p> <p>1 not many people move from the Black Belt to the City of</p> <p>2 Mobile for work?</p> <p>3 A. I can't tell you what those numbers are, and I'm</p> <p>4 not suggesting. I'm just saying that people come and go</p> <p>5 to work and better themselves. I can't tell you what</p> <p>6 that number is.</p> <p>7 Q. But based on people who you know?</p> <p>8 A. Based on the few people I know, and you can't</p> <p>9 use that as some type of exponent either. I've got a</p> <p>10 small realm of people. I may know quite a few people,</p> <p>11 but you can't put an exponent on that.</p> <p>12 Q. Yes, but the question is based on the people you</p> <p>13 know.</p> <p>14 A. People I know come here to work, and they go</p> <p>15 back and forth. There's a real need up there for some</p> <p>16 help and somebody that's going to drive their economy,</p> <p>17 somebody that's going to continue to work for that area</p> <p>18 every day. They need a different type of representation.</p> <p>19 Q. What do you mean they need a different type of</p> <p>20 representation?</p> <p>21 A. They need someone -- That region needs to be</p> <p>22 represented by someone that is totally looking at that</p> <p>23 region every day and understands it, understands the</p> <p>24 climate, the people, understands the industry and what's</p> <p>25 needed, but also, at the same time, understands how those</p>

<p style="text-align: right;">Page 54</p> <p>1 regions merge with cities like Mobile and understand 2 those relationships. That's something that's been 3 overlooked for a long time. 4 Q. How do these cities merge with places like 5 Mobile? 6 A. I've explained that several times. Through the 7 opportunity for better education, better job 8 opportunities, better standard of living, better places 9 to buy clothing. I mean, people have to come here to 10 get, sometimes, their needs, their basic needs. There 11 are no malls in the Black Belt. There may be a few 12 Walmarts, but there are no malls in the Black Belt. 13 Q. So why does, you know, those factors you just 14 listed, why do those mean that Mobile should be in the 15 same Congressional district as the Black Belt counties? 16 MS. RUTAHINDURWA: Object to the form. 17 Q. You can answer. 18 A. Why does that mean? I don't determine who draws 19 the lines. And what does it mean? Because the way I see 20 it, you guys have only -- I say "you guys," they've only 21 put a portion of Mobile into the Congressional district 22 two, if that's what you're asking. The whole county is 23 not there. 24 Q. I'm talking about the city. 25 A. The city?</p>	<p style="text-align: right;">Page 56</p> <p>1 telling you when I say that? 2 I mean, those relationships help to steady the 3 Black Belt, especially when they didn't have 4 representation that either thought like them or wanted to 5 vote like them but needed to get a voice to someone that 6 could possibly hear them. And I remember those days very 7 vividly. 8 Q. So am I understanding you correctly, you're 9 saying that the City of Mobile has more influence 10 politically than the Black Belt counties? 11 A. Yes, sir, it does. 12 Q. And that's why you need to pair the two 13 together? 14 A. I would think that the influence of the 15 population base here helps the Black Belt very strongly 16 when there's a need. 17 Q. And which counties of the Black Belt does it 18 help? 19 A. I can't really tell you which counties it helps. 20 I would expect it helps them all, especially when there's 21 a huge voting block here that votes to elect someone who 22 is a like-minded thinker of the population base on which 23 it's being represented. 24 Q. And what voting block is that? 25 A. I think they're Democrats.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. So you said that -- 2 A. I would think, and I said this to you earlier, 3 that the inner city of Mobile is pretty purple. So when 4 you draw those lines to differentiate between Democrats 5 and Republicans, then I think that the population base 6 gives a better opportunity for someone to elect someone 7 of their choosing. 8 Q. So going back a little bit. You said that the 9 Black Belt needs a representative who understands the 10 connection between the Black Belt and the City of Mobile. 11 Do you think the City of Mobile and the Black Belt should 12 be in the same Congressional district? 13 A. Sure. 14 Q. Why? 15 A. Well, let me put it to you this way: I grew up 16 -- My mother worked for John J. Sparkman first, Howell 17 Heflin second, then Richard Gephardt third. So I grew up 18 campaigning and being young going from Mobile through the 19 Black Belt helping get Heflin reelected and putting 20 things in the street. So I have a strong relationship 21 with the Black Belt, and I live in Mobile. So when you 22 say that you have relationships between Mobile and the 23 Black Belt, then you do, because if it wasn't for 24 Mobile's strength, then the Black Belt doesn't get heard, 25 especially during those days. Do you understand what I'm</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. Did you see the 2021 Congressional map that the 2 legislature passed and the governor signed? 3 A. I don't remember it, but I've heard a whole lot 4 about it. 5 Q. Did you see the 2023 map that the legislature 6 passed? 7 A. I don't remember. 8 Q. So this is the map that the legislature passed 9 after the first district court ruling. 10 A. It was rejected, right? The one that was 11 rejected? 12 Q. The first one that was rejected was the 2021 13 map, and then the 2023 map was the second one. 14 A. And was it also rejected? 15 Q. Yes. I'll mark this as Exhibit 3. 16 (Exhibit 3 was marked for identification.) 17 Q. Have you seen this map before? 18 A. Not that I remember. So one is Baldwin and 19 Mobile, Escambia and Covington. Is that not right? 20 Q. That's correct. 21 A. And then two is Coffee, Geneva, Dale, Houston 22 and Henry. And all of these, Lowndes, Montgomery, all 23 these other areas over here, the color is kind of shaded, 24 but I think I've got it. Follow the black lines, right? 25 Q. Yes, the bold lines.</p>

<p style="text-align: right;">Page 58</p> <p>1 A. Okay. I'm looking at it.</p> <p>2 Q. Do you have any impression of this map?</p> <p>3 A. What do you call "impressions"?</p> <p>4 Q. Do you have any positive or negative reaction to</p> <p>5 any of the districts in this map?</p> <p>6 A. Are you asking me historically or future,</p> <p>7 because this map doesn't meet the goal of the census</p> <p>8 count that was done in 2020?</p> <p>9 Q. What do you mean by that?</p> <p>10 A. Well, I mean, based on the census count, there's</p> <p>11 a need for an additional majority-minority district, and</p> <p>12 this just doesn't do it.</p> <p>13 Q. Why is there a need for additional</p> <p>14 majority-minority --</p> <p>15 A. The law basically says if you have a census</p> <p>16 count at a certain number, then we adjust for -- and</p> <p>17 based on the population of the state, then there's</p> <p>18 another need for a majority-minority district, and this</p> <p>19 is not doing it, not looking at these lines.</p> <p>20 Q. What do you think of district one?</p> <p>21 A. What are you asking me about?</p> <p>22 Q. What do you think about Mobile, Baldwin,</p> <p>23 Escambia and Covington being in --</p> <p>24 A. How so? You've got to be more specific. What</p> <p>25 are you asking me? What do I think? I can think</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Your voice isn't heard.</p> <p>2 Q. What do you mean "your voice isn't heard"?</p> <p>3 A. Let's just say that if someone wants to put a</p> <p>4 million dollars or 20 million dollars into the port but</p> <p>5 you have a section of the city that needs 10 million</p> <p>6 dollars, then that money is going to go to the port</p> <p>7 before it goes to a section of the city that's dying</p> <p>8 because that's where the interest is. That's what I'm</p> <p>9 saying.</p> <p>10 Q. Would the City of Mobile benefit from all that</p> <p>11 money being injected into the port?</p> <p>12 A. Some, but the people are the drivers of this</p> <p>13 country, also, and not just big business, and a lot of</p> <p>14 times we need to get resources to where the people are</p> <p>15 and not just where industry is. And that's another</p> <p>16 reason why people leave certain cities.</p> <p>17 Q. Is that a reason why people have left the City</p> <p>18 of Mobile?</p> <p>19 A. I would say some of the people that left the</p> <p>20 City of Mobile were leaving because they wanted bigger</p> <p>21 yards and bigger houses and places to get that, and you</p> <p>22 just don't get those lot sizes inside the City of Mobile</p> <p>23 now. Most lot sizes are small, so they venture to</p> <p>24 Baldwin County so they can have five acres and a house.</p> <p>25 Q. So who is your current Congressional</p>
<p style="text-align: right;">Page 59</p> <p>1 100,000 things. Be more specific. What are you asking</p> <p>2 me?</p> <p>3 Q. Do you think it makes sense to have those four</p> <p>4 counties in the same district?</p> <p>5 A. It depends on what goal whoever drew the line is</p> <p>6 trying to accomplish. It looks like somebody is trying</p> <p>7 to create a Republican stronghold with those four</p> <p>8 counties, if you ask me.</p> <p>9 Q. Do you think they have the same economic</p> <p>10 interest?</p> <p>11 A. I would think that -- No. Escambia would be a</p> <p>12 little bit different from Baldwin and Mobile. Covington</p> <p>13 is definitely different. But the population base based</p> <p>14 on the way people vote in those counties or in Baldwin,</p> <p>15 Escambia and Covington are the same. That's a true</p> <p>16 bleed, if you ask me. Mobile, outside of 65, is true</p> <p>17 red, too. So you get -- If you're blue in these four</p> <p>18 counties, you're lost. You're unrepresented.</p> <p>19 Q. Is that why you don't like district one?</p> <p>20 A. It's not why I don't like it. I'm just telling</p> <p>21 you the truth. If you're blue in these four counties,</p> <p>22 then you're lost. You're not represented because you're</p> <p>23 going to get overpowered by the people that are</p> <p>24 represented on the other side.</p> <p>25 Q. What do you mean "you're not represented"?</p>	<p style="text-align: right;">Page 61</p> <p>1 representative?</p> <p>2 A. Jerry Carl.</p> <p>3 Q. Do you feel like he represents you?</p> <p>4 A. I know who he is, but I really don't know him.</p> <p>5 Q. Who was the representative before Jerry Carl?</p> <p>6 A. Joe Bonner.</p> <p>7 Q. Who?</p> <p>8 A. Joe Bonner.</p> <p>9 Q. He was your Congressional representative?</p> <p>10 A. I'm trying to remember. It was Bradley -- Joe,</p> <p>11 Bradley, Jerry. I can't even remember them anymore.</p> <p>12 It's out of order, but one of those three.</p> <p>13 Q. Do you think it was Bradley Byrne?</p> <p>14 A. Could have been. Probably so. And then did Joe</p> <p>15 come before Bradley? I can't remember anymore. Look,</p> <p>16 Joe and Bradley are really good friends, so I can't</p> <p>17 remember the order anymore. Jerry Carl isn't that a</p> <p>18 close a friend. I grew up around Bradley all the time,</p> <p>19 and I knew Joe, too, and I knew Sonny and all that bunch</p> <p>20 because my mother was so tied to politics. So the order</p> <p>21 is mixed up in my head right now. I can't remember.</p> <p>22 Q. I'm sorry. Did you say Bradley and someone else</p> <p>23 were close friends. Close friends of yours?</p> <p>24 A. Yes.</p> <p>25 Q. And Bradley Byrne was your Congressional</p>

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1 representative?

2 A. I don't remember the dates. You asked me what

3 was the succession. I don't remember right now. I could

4 tell when you Bradley was a Democrat. I could tell you

5 when Joe was a Democrat. I could tell you when all those

6 guys were Democrats and probably the year it all started

7 changing, probably before you guys were born.

8 Q. Why do you think it started changing?

9 A. I think people chose parties because of

10 political expediency back then. Some changed for the

11 ease of election. Some changed for other reasons.

12 Bradley ran for the state board of education under the

13 Democratic ticket and won and then later changed, changed

14 parties. That was his first office held.

15 Q. So Bradley Byrne at one point was your

16 Congressional representative?

17 A. That's correct, and he was a Republican at that

18 time, if I remember right.

19 Q. Do you think he represented you?

20 A. Represented me because I've known him since I

21 was seven years old, and I could pick up the phone and

22 call him in person and say, That ain't right, and that's

23 the way I said it, That ain't right and things need to be

24 done. And I've got a pretty big voice when it comes to

25 that, especially when he's known my whole family.

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1 Q. But would he listen to you?

2 A. Yeah. Still does.

3 Q. What does he do now?

4 A. He's president of the chamber of commerce in

5 Mobile.

6 Q. Of the City of Mobile?

7 A. Well, it's the Mobile County chamber, I believe.

8 Q. So when Bradley Byrne was your representative,

9 you felt your voice was heard?

10 A. Depends on whether or not I needed to call him

11 or not on issues that affected our area or the areas that

12 needed to be -- needed to feel some change.

13 Q. And did he work with you to benefit your --

14 Sorry. Let's back up. Strike that.

15 Were you a city councilman when he was in

16 office?

17 A. I don't think so.

18 Q. Do you know who your congressman would have been

19 your first term as a city councilman?

20 A. I can't remember. I just don't. I'm sorry.

21 That was '05. Somebody tell me who was there in '05.

22 Q. I'll stick to the questions for now.

23 A. It wasn't Sonny, so who was it? Was it Joe? It

24 wasn't Joe either. I don't remember.

25 Q. I'll put it this way: As a city councilman,

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1 have you ever interacted with a congressman to advance

2 your district's interests?

3 A. Not really, no.

4 Q. So when you were talking to Bradley Byrne about

5 issues you saw in the community, was that just in a

6 personal capacity?

7 A. Yeah, when things needed to be adjusted and

8 money needed to be placed and people needed to be helped.

9 Q. How did you know him?

10 A. I grew up with him -- well, grew up around him.

11 I was younger than he was, but I've been intrenched in

12 the political arena with him, my mother and others for a

13 long time.

14 Q. Did he go to school with you?

15 A. No. He went to UMS. I'm 55, so Bradley has got

16 to be at least 12 years ahead of me or better, maybe

17 more. So, no, I didn't go to school with him.

18 Q. And is he from the City of Mobile?

19 A. As far as I know.

20 Q. Do you think he understood the City of Mobile

21 well?

22 A. Yeah.

23 Q. And its concerns? Do you think that's important

24 for whoever represents the City of Mobile in Congress?

25 A. Extremely important that the person that

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1 represents this region is from this area and understands

2 it. There's so many dynamics that they would have to be

3 from here and have an intrinsic knowledge of the people

4 and the industries and the things that affect not just

5 Mobile but that affect the outlying areas and the region.

6 Q. And so when you just referenced this region,

7 what region are you talking about?

8 A. I'm talking about probably as far north as up to

9 where the next major industry is, which would be

10 Montgomery. I mean, Mobile affects a huge portion of

11 this state, and whether you know it or not, with our port

12 being here as strong as it is, it affects a lot of the

13 state. It affects people who don't even realize it. So

14 I would think that whoever represents Mobile has to have

15 a strong knowledge of the port, has to have a strong

16 knowledge of Austal and Airbus and other major industry,

17 has to have a strong knowledge of what's happening from

18 here up through the Black Belt and then all the way up to

19 Montgomery, because, if not, you kind of get lost, you

20 know, because of what we do here.

21 Q. So do you think someone from Montgomery County

22 would have a strong understanding of the Mobile Bay and

23 its significance?

24 A. No.

25 Q. Where -- Are there any particular counties where

<p style="text-align: right;">Page 66</p> <p>1 you think that person would need to be from?</p> <p>2 A. Well, I would think that the people in</p> <p>3 Montgomery that really understand Mobile would be the</p> <p>4 people that deal with the waterways and are relying on</p> <p>5 what things come up through the port and, you know, those</p> <p>6 type of logistics issues. But the people that just live</p> <p>7 there, I wouldn't think they have a strong understanding</p> <p>8 of our port here and how it works.</p> <p>9 Q. Do you think it would be important for the</p> <p>10 representative to be from Mobile County?</p> <p>11 A. I think that the person that represents -- Are</p> <p>12 you talking specifically about this district two now?</p> <p>13 Q. No. I'm just talking about whoever represents</p> <p>14 the interests of, you know, the Mobile Bay, the City of</p> <p>15 Mobile, because you were talking about how whoever</p> <p>16 represents, you know, this area because of the</p> <p>17 significance to the region needs to have a deep</p> <p>18 understanding of it. So would someone just from the</p> <p>19 County of Mobile have a deep understanding of the</p> <p>20 significance of the City of Mobile and the bay?</p> <p>21 A. From Mobile County?</p> <p>22 Q. Yes.</p> <p>23 A. It depends on who that person is, and normally</p> <p>24 that person that's running, you look for those</p> <p>25 characteristics in that person, how well do they</p>	<p style="text-align: right;">Page 68</p> <p>1 the port and what it does, just the average person over</p> <p>2 there.</p> <p>3 Q. So does the term "community of interest" mean</p> <p>4 anything to you? Have you heard that term before?</p> <p>5 A. Yeah.</p> <p>6 Q. What does it mean to you?</p> <p>7 A. Which community are you asking about?</p> <p>8 Q. Just the phrase, "community of interest." Does</p> <p>9 that mean anything to you?</p> <p>10 A. Well, I mean, when I hear the term, I</p> <p>11 immediately think of what area of high interest that, you</p> <p>12 know, I'm wanting to hear about and be concentrated on.</p> <p>13 You know, this is the community of interest we're talking</p> <p>14 about. This is the area that has the most need and has</p> <p>15 the most interest in it right now. That's what I would</p> <p>16 immediately think and have come to mind.</p> <p>17 Q. Do you think -- Have you heard the term</p> <p>18 "community of interest" be used in the redistricting</p> <p>19 context ever?</p> <p>20 A. With me paying attention, I don't remember. So</p> <p>21 many conversations, I don't know. I couldn't confirm or</p> <p>22 deny.</p> <p>23 Q. So if you're looking at two different areas to</p> <p>24 determine whether they should be in the same</p> <p>25 Congressional district and you want to say, Okay, is this</p>
<p style="text-align: right;">Page 67</p> <p>1 understand the workings of our county as it works with</p> <p>2 all the surrounding counties and those needs. I mean,</p> <p>3 that's a principal part of leadership, and that's a</p> <p>4 principal part of decision-making when it comes to</p> <p>5 electing someone that's going to represent you.</p> <p>6 Q. Do you think someone from Baldwin County would</p> <p>7 be likely to have that understanding?</p> <p>8 A. I would say in the past, you've never seen</p> <p>9 anybody from Baldwin County elected to represent this</p> <p>10 area.</p> <p>11 Q. Do you think Baldwin County residents,</p> <p>12 generally --</p> <p>13 A. I just answered that. I don't think so. I</p> <p>14 don't think we've had an elected official that has been</p> <p>15 from Baldwin County to represent this area.</p> <p>16 Q. Do you think Baldwin County residents</p> <p>17 understand?</p> <p>18 MS. RUTAHINDURWA: Object to the form.</p> <p>19 A. No. I don't think -- For a long time, Baldwin</p> <p>20 County was so rural that they were more concentrated on</p> <p>21 agricultural needs. It's just been in the last 20, 30</p> <p>22 years that they've seen the population boom along the</p> <p>23 coast and their tourism dollars grow to the record they</p> <p>24 have and the cities like Foley started to grow. So I</p> <p>25 would say they wouldn't have the intrinsic knowledge of</p>	<p style="text-align: right;">Page 69</p> <p>1 a community of interest, do they have the same history,</p> <p>2 values, economic interest, etc., have you heard community</p> <p>3 of interest used in that --</p> <p>4 A. Well, when you put it in that terms, you're</p> <p>5 talking about people that are looking -- Are you talking</p> <p>6 about communities of interest that are willing to be</p> <p>7 strung together in order to represent somebody that's</p> <p>8 going to be able to represent their interests based on, I</p> <p>9 think, their ideology or philosophy? In that case, yeah.</p> <p>10 Q. So do you think economic interests are important</p> <p>11 in deciding whether people can come together to be in the</p> <p>12 same district?</p> <p>13 A. Yes.</p> <p>14 Q. What are the most important sectors of the</p> <p>15 Mobile economy, the City of Mobile?</p> <p>16 A. What are the drivers here? Most people think</p> <p>17 it's other things, but probably our biggest driver in our</p> <p>18 economy here is the port, probably is our biggest</p> <p>19 economic engine here. Then, secondly, would be probably</p> <p>20 our med industry through South Alabama. It's growing</p> <p>21 strong. And then Austal and Airbus after that would be</p> <p>22 third and fourth. And believe it or not, our school</p> <p>23 system would be in there, too. I think they have about</p> <p>24 4500 employees. They would be part of our drivers,</p> <p>25 especially when it comes to receiving paychecks. That's</p>

<p style="text-align: right;">Page 70</p> <p>1 just me thinking off the top of my head.</p> <p>2 Q. What are the important geographical features?</p> <p>3 A. In Mobile? Water.</p> <p>4 Q. Do you think that --</p> <p>5 A. 30 minutes, you can be in international water</p> <p>6 from the Port of Mobile. That's huge. You can't get</p> <p>7 there like that from New Orleans. So when it comes to</p> <p>8 international shipping, that's a big deal. Plus, we have</p> <p>9 a water system that goes all the way up north. We even</p> <p>10 have the Tennessee-Tombigbee. That doesn't see as much</p> <p>11 transport as it used to, but, I mean, we have a huge</p> <p>12 waterway system here when it comes to geographic systems</p> <p>13 that goes from Mobile to Selma and Montgomery. So that's</p> <p>14 probably one of our biggest geographical features.</p> <p>15 We've got great land here, good residential</p> <p>16 growth base, but we're clustered downtown where we can't</p> <p>17 do anything. We need some revitalization to get that</p> <p>18 stuff straightened out.</p> <p>19 Q. Do you think it makes sense to base</p> <p>20 Congressional districts around geography or account for</p> <p>21 geography?</p> <p>22 MS. RUTAHINDURWA: Object to form.</p> <p>23 Q. You can answer.</p> <p>24 A. You're talking about following county lines?</p> <p>25 Q. No, I'm talking about the Port of Mobile.</p>	<p style="text-align: right;">Page 72</p> <p>1 It's two hours to New Orleans, three and a half hours to</p> <p>2 Tallahassee, five and a half to Jacksonville, four and a</p> <p>3 half to Atlanta. So this is a drive market, two and a</p> <p>4 half to Montgomery and three and a half to Birmingham.</p> <p>5 So I would say automotive transportation is number one.</p> <p>6 Number two would probably be air transport. Buses and</p> <p>7 things like that would be on the low end of it.</p> <p>8 Q. And what are the important educational</p> <p>9 institutions of the City of Mobile?</p> <p>10 A. Higher education?</p> <p>11 Q. Yes.</p> <p>12 A. South Alabama, University of Mobile, Coastal</p> <p>13 Alabama Community College, Bishop State.</p> <p>14 Q. Are all of those in the City of Mobile?</p> <p>15 A. No. Bishop State, USA, Spring Hill College.</p> <p>16 Q. And are those important as employers or just --</p> <p>17 A. Both.</p> <p>18 Q. Okay. Both. So as a city councilman, do you</p> <p>19 think your constituents have similar interests?</p> <p>20 A. Yes.</p> <p>21 Q. What interests do you think those are?</p> <p>22 A. Be more specific because you don't know my</p> <p>23 interests. What interests are you asking about?</p> <p>24 Q. Your constituents, do they care about the same</p> <p>25 policy initiatives?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. What about the port? Having the port in one</p> <p>2 region and --</p> <p>3 Q. Yes, or access to the ocean, rivers.</p> <p>4 A. Well, if you have two separate representatives</p> <p>5 representing the port, then both need to have a clear</p> <p>6 understanding of it. I think if you have one that</p> <p>7 doesn't, then we'll have a hard time sometimes, but if</p> <p>8 that person has a strong enough knowledge base and can</p> <p>9 catch up and understand the true value of the port to the</p> <p>10 state, then we may have a chance. But, you know, other</p> <p>11 than that, no.</p> <p>12 Q. So if Mobile County is divided into two</p> <p>13 different Congressional districts and neither one</p> <p>14 understood the port --</p> <p>15 A. Then you'd have a problem.</p> <p>16 Q. You would have a problem?</p> <p>17 A. Yeah, if neither one understood, we would have a</p> <p>18 problem. That's why it's so important to be able to</p> <p>19 elect someone from the region that understands, and I</p> <p>20 think everybody here understands that.</p> <p>21 Q. What's the important transportation</p> <p>22 infrastructure to the City of Mobile?</p> <p>23 A. Right now, transportation? This is a drive</p> <p>24 region. So cars are more important than anything else.</p> <p>25 People here drive three and a half hours, on average.</p>	<p style="text-align: right;">Page 73</p> <p>1 A. I think my constituents care a lot about</p> <p>2 revitalization, historic preservation, infrastructure</p> <p>3 improvements, neighborhood improvements, revitalization</p> <p>4 the need for revitalization in areas that have been</p> <p>5 underserved.</p> <p>6 Q. And do you think that's across the board?</p> <p>7 A. I would say right now, 70/30. I mean, my</p> <p>8 district is 62/38, and I would say that 60 percent of the</p> <p>9 people that are truly from those areas are all in. I</p> <p>10 would say another portion of those people that are from</p> <p>11 the wealthier streams that don't see those neighborhoods</p> <p>12 want more for their area but also understand the big need</p> <p>13 to revitalize those areas.</p> <p>14 Q. So is there a specific portion of your district</p> <p>15 that is wealthier than the others?</p> <p>16 A. Yes. I have the richest of the -- Look,</p> <p>17 district two, I don't know if you've asked the other</p> <p>18 councilmen this. District two is the heart of the city.</p> <p>19 Anything and everything about the city resides here. I</p> <p>20 have the richest of the rich and the poorest of the poor.</p> <p>21 At one point, I had every housing project, every lower</p> <p>22 subdivision. I had the oldest -- still have the oldest</p> <p>23 parts of the city. And on the other end, I have the</p> <p>24 richest parts of the city with Oakleigh and the most</p> <p>25 historic part of it. I have Government Street with all</p>

<p style="text-align: right;">Page 74</p> <p>1 its wealth and mansions and historic replica, as y'all 2 have seen coming into our city. I've got every ounce of 3 it. I've got downtown. I've got the business district. 4 I have the port. I have everything all the way to the 5 Port of Chickasaw. I have Plateau which encompasses 6 Africatown. You guys are all aware of what's happening 7 up there with the finding of the Clotilda and the history 8 of the slaves that landed there in that community that's 9 been left out for so long. So district two is quite 10 diverse. 11 Q. And did you say that some of the wealthy 12 constituents you have are in favor of revitalization and 13 some are not? 14 A. A small percentage. They're more concerned 15 about fixing the potholes on the street than putting 16 money into a neighborhood that really needs it that's 17 failing. And sometimes you have to put money where 18 there's a bigger need than a small pothole on the street 19 that might be able to wait for a few months or so. It 20 makes a big difference, especially with people's lives. 21 Q. Do you think that interests -- I assume -- Do 22 you meet with constituents regularly? 23 A. Regularly. 24 Q. And you're from your council district? 25 A. I've lived in this council district for 55</p>	<p style="text-align: right;">Page 76</p> <p>1 going to see many minorities at the major parading 2 organizations' balls, but you will see them at the balls 3 that are hosted by minorities. 4 Q. Why don't you see them at the major balls, I 5 think you referred to them as? 6 A. Man, look, if I get an invitation, I'd be 7 surprised, and it's all about who invites who, but we do 8 invite others for our balls, yes, and they do attend. 9 But, I mean, I think I made the statement two weeks ago 10 at the civic center's function where I said, Hey, I did 11 receive an invitation once to a ball and actually went 12 and watched the tableau and danced one dance and left. 13 That's been 20 years ago. 14 Q. What was that you watched? 15 A. The tableau. You would say call-outs. It's 16 called a tableau. 17 Q. Okay. But your constituents attend parades in 18 the City of Mobile? 19 A. Yes. 20 Q. Do you know if any of them go to Baldwin County 21 to celebrate Mardi Gras? 22 A. I don't know. 23 Q. Do you know if people from Baldwin County come 24 to -- 25 A. Mobile?</p>
<p style="text-align: right;">Page 75</p> <p>1 years, and I'm 55 years old, except for the time I was in 2 college and travel and doing other things, but I was 3 always here. 4 Q. Do you think the interests of your white 5 constituents in general differ from the interests of your 6 black constituents? 7 A. Depends on what the immediate need is at the 8 time, but, yes. 9 Q. When you say "depends on the immediate needs," 10 what do you mean? 11 A. Everybody wants their streets fixed. Everybody 12 wants their sidewalks fixed, but not everybody wants a 13 neighborhood restored. 14 Q. But, in general, do they want the same things 15 for the city? 16 A. Basically, we all do. We want less crime. We 17 want better living conditions and quality of life. We 18 want entertainment. We want all the things that make our 19 city go. 20 Q. Speaking of entertainment, do your constituents 21 celebrate Mardi Gras? 22 A. Yes, sir. I live five houses from the main 23 route. 24 Q. Do they go to parades and balls in Mobile? 25 A. Balls are somewhat segregated here. You're not</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. -- Mobile to celebrate Mardi Gras? 2 A. Oh, yes. 3 Q. Are the Mardi Gras celebrations here larger than 4 in Baldwin County? 5 A. Yes. 6 Q. Do the activities of the Mobile Airport 7 Authority affect your constituents? 8 A. Yes. 9 Q. How? 10 A. Are you talking about the board or the growth of 11 the airport? 12 Q. Let's start with the growth of the airport. 13 A. Well, it makes it easier for people downtown 14 which are in my district to gain access to planes or 15 travel easier than driving all the way out to West 16 Mobile. 17 Q. And does that benefit the city's economy? 18 A. I don't know if it's a benefit to the city's 19 economy, but it is a very useful tool, and depending on 20 how many additional flights we get in and out and -- You 21 know, I don't know if the city -- I need to look at the 22 map, but I don't know if the regional airport is within 23 the city limits or if it's just attached. I need to look 24 at that. I'm basing that on tickets sold and tax 25 revenue.</p>

<p style="text-align: right;">Page 78</p> <p>1 Q. And what about just the decisions of the</p> <p>2 authority in general, aside from --</p> <p>3 A. I haven't really thought about it.</p> <p>4 Q. Does Baldwin County benefit from the airport</p> <p>5 expansion?</p> <p>6 A. God, yeah. They don't have to drive all the way</p> <p>7 to Pensacola anymore. It's an easier in and out for</p> <p>8 them, too. It helps.</p> <p>9 Q. What do you mean "it's an easier in and out"?</p> <p>10 A. Well, I mean, they don't have to drive all the</p> <p>11 way to the regional airport that's in West Mobile, and</p> <p>12 they don't have to drive all the way to Pensacola for</p> <p>13 those that are just across the border in Daphne. So it</p> <p>14 helps people in Fairhope. There's a closer regional</p> <p>15 airport where they can get to and from where they are.</p> <p>16 Also, it helps us, especially if they stop and buy dinner</p> <p>17 or get a hamburger on the way to the airport, increases</p> <p>18 our tax base, too.</p> <p>19 Q. Does the Alabama Port Authority affect your</p> <p>20 constituents?</p> <p>21 A. Being it's probably the largest economic driver</p> <p>22 that we have and people that are in my district, some</p> <p>23 that work there, yes, it affects it.</p> <p>24 Q. Do a large percentage of your constituents work</p> <p>25 there?</p>	<p style="text-align: right;">Page 80</p> <p>1 find a consensus with the administration to do affordable</p> <p>2 housing in those underserved neighborhoods that we talked</p> <p>3 about to help revitalize them.</p> <p>4 Q. Do you know if affordable housing is an issue in</p> <p>5 Black Belt counties?</p> <p>6 A. I don't know specifically, but, I mean, it's</p> <p>7 been -- With the current rate of economy and inflation,</p> <p>8 affordable housing has been an issue in a lot of places.</p> <p>9 So I can't make that assumption without knowing their</p> <p>10 demographics and knowing what's going on.</p> <p>11 MR. MAULDIN: So can we go off the record for a</p> <p>12 minute?</p> <p>13 (An off-the-record break was taken, after which</p> <p>14 the following occurred:)</p> <p>15 MR. MCKAY: This a Charles McKay, and we -- for</p> <p>16 Secretary Allen, we are going to wait an hour, and then</p> <p>17 come back on the record so that Councilman Carroll can do</p> <p>18 something. And in about an hour, we are willing to</p> <p>19 resume the deposition. Do y'all agree to that?</p> <p>20 MS. RUTAHINDURWA: Yeah. That works for the</p> <p>21 Caster Plaintiffs.</p> <p>22 (An off-the-record break was taken, after which</p> <p>23 the following occurred:)</p> <p>24 BY MR. MAULDIN:</p> <p>25 Q. So we're back on the record after Councilman</p>
<p style="text-align: right;">Page 79</p> <p>1 A. I have many people that work for the ILA, which</p> <p>2 is the longshoreman's labor union that load and unload at</p> <p>3 the docks from my district, so, yes.</p> <p>4 Q. Do you know if people from Baldwin County</p> <p>5 commute to work at the port authority?</p> <p>6 A. Well, considering that David Cooper lives in</p> <p>7 Baldwin County, he owns Cooper Stevedore, I would say,</p> <p>8 yes. They're the largest stevedores in this region, and</p> <p>9 they're Baldwin County guys.</p> <p>10 Q. What was that name?</p> <p>11 A. David Cooper.</p> <p>12 Q. And who is he?</p> <p>13 A. Cooper Stevedoring, Cooper T. Smith. They do</p> <p>14 the tugboats and all the stuff in the port.</p> <p>15 Q. And that is a company based in Baldwin County?</p> <p>16 A. They're based right here, but he lives in</p> <p>17 Baldwin County. They may have a home here, but their</p> <p>18 family home is right there in Robertsdale, I believe, or</p> <p>19 somewhere around that region.</p> <p>20 Q. Is affordable housing an issue in the City of</p> <p>21 Mobile?</p> <p>22 A. One of our largest problems.</p> <p>23 Q. Are you, as a member of the city council, doing</p> <p>24 anything to address that?</p> <p>25 A. I'm working on a resolution right now trying to</p>	<p style="text-align: right;">Page 81</p> <p>1 Carroll needed a break to run some errands.</p> <p>2 Did you speak with anyone about this deposition</p> <p>3 while you were gone?</p> <p>4 A. No.</p> <p>5 Q. Nobody? When we left off, we were looking at</p> <p>6 Exhibit 3, the 2023 Congressional map.</p> <p>7 A. Yes.</p> <p>8 Q. Are there any communities of interest in this</p> <p>9 map that you believe should have been kept together but</p> <p>10 were not?</p> <p>11 MS. RUTAHINDURWA: Object to the form.</p> <p>12 A. One, I don't know the demographics of all these</p> <p>13 areas, and I didn't at that time, so I can't say yes or</p> <p>14 no.</p> <p>15 Q. Why do you need to know the demographics to know</p> <p>16 the communities of interest?</p> <p>17 A. Well, in order to shape a district that is</p> <p>18 representative of the population of the state, you can't</p> <p>19 do it unless you know the demographics, and you can't</p> <p>20 draw a map without knowing that information.</p> <p>21 Q. So do you think that a racial demographic should</p> <p>22 be a primary concern in the Congressional redistricting?</p> <p>23 MS. RUTAHINDURWA: Object to the form.</p> <p>24 A. When you're granting people to -- When you're</p> <p>25 giving an opportunity to give people the chance to elect</p>

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1 someone of their choice or their like based on a
 2 principle and philosophy, then you're, obviously, with
 3 the State of Alabama, going to look at several things.
 4 You're going to look at party, race and other. So, yeah,
 5 it's important to look at that. Party being one because
 6 not all Democrats are black; race, because probably the
 7 majority of Democrats are black; and then "other,"
 8 depending on what the other ethnic groups' philosophies
 9 are.
 10 Q. So why is, again, race so important to
 11 determining, according to a philosophy, whether you have
 12 equal opportunity?
 13 A. Well --
 14 MS. RUTAHINDURWA: Object to the form. Just
 15 give me a moment to jump in and object.
 16 A. Historically, more Democrats are black than
 17 white or other. That's why. You're looking at a party
 18 affiliation more so than you are race.
 19 Q. And in looking at this map, you said that
 20 without knowing demographics, you wouldn't know whether
 21 these districts are reasonable?
 22 A. That's right. You've got to know the voting
 23 history, how the blacks are voting, Democratic or
 24 Republican, the groups, where they are, where the
 25 concentration of those Democratic votes are. And with

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1 that map, I wouldn't know what I'm looking at. I
 2 wouldn't know what I'm looking at unless I had the
 3 demographics by county.
 4 Q. And so, you know, any redistricting map that
 5 you're looking at, you can't judge -- you can't really
 6 form an opinion on the map without knowing racial
 7 demographics, is that --
 8 A. Without knowing all the demographics. It's not
 9 just race. Again, you've got to know how they're voting,
 10 whether it's Democratic or Republican, and then you have
 11 to know the racial background to go with it, and you have
 12 to know the other, too. You just can't look at one or
 13 the other. You have to know all of it, and you have to
 14 be able to discern your map based on all of those things.
 15 Q. And so is your primary concern partisan or
 16 race -- or racial?
 17 MS. RUTAHINDURWA: Object to the form.
 18 A. My primary concern is being able to have someone
 19 elected that is like-minded of the demographic that I
 20 would represent or would like to see represented based on
 21 the census count. The census count said that there are
 22 so many more minorities in the city -- I mean, in the
 23 state, and the majority of minorities are Democratic. So
 24 when I look at it, I'm looking at it based on both
 25 minorities and party affiliation.

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1 Q. All right. So let's talk about the Black Belt
 2 again. You said that Washington County is in the Black
 3 Belt, as you understand it.
 4 A. I consider it that way because it's -- You know,
 5 going that way, you're going along that line coming to
 6 Choctaw -- and I haven't thought about this in a long
 7 time, coming to Choctaw, Clarke, Marengo, Wilcox, coming
 8 across there, Monroe, you're getting into the heart of
 9 what was our southern growing area, as I call it, and,
 10 you know, I would just lump them in there.
 11 Q. So you just listed Choctaw as well, correct?
 12 A. Yeah, and that's just based on the growing area.
 13 I would even include Greene County and Sumter as part of
 14 the Black Belt coming across there, even though they're
 15 not within the Congressional districts that you guys have
 16 gotten or we're currently talking about.
 17 Q. So you listed Washington County as in the Black
 18 Belt?
 19 A. That's just my personal --
 20 Q. Yeah, when you're talking about the Black Belt,
 21 that's what --
 22 A. I would just say that, simply because it's
 23 above -- I've always done that, simply because it's above
 24 Mobile and Baldwin Counties.
 25 Q. And what about Clarke County?

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1 A. Clarke County? Yes.
 2 Q. Marengo? I'm not sure if you said Marengo.
 3 A. Yes.
 4 Q. Wilcox?
 5 A. Yes.
 6 Q. Monroe?
 7 A. Monroe. Where are we?
 8 Q. It's right east of Clarke County.
 9 A. Yes. That's Monroeville, all that area,
 10 Conecuh, Butler, Crenshaw, Lowndes, Bullock, Macon,
 11 Russell, Pike.
 12 Q. I'm sorry. What did you just say?
 13 A. I was even thinking about Pike, just looking at
 14 the area and how it used to stretch.
 15 Q. What does Mobile, the City of Mobile, have in
 16 common with Russell County?
 17 A. I don't know.
 18 Q. What does the City of Mobile have in common with
 19 Macon County?
 20 A. Macon is Tuskegee. A lot.
 21 Q. Such as?
 22 A. Education.
 23 Q. What do you mean by "education"?
 24 A. Let's see. Macon is -- Let's see. Well,
 25 there's educational value that comes from up that way

<p style="text-align: right;">Page 86</p> <p>1 where people are educated at Tuskegee and the schools in 2 that area, Tuskegee, Alabama State, and they come back 3 and live in Mobile because of the higher education and 4 the jobs here. So they grew up there. They get educated 5 at Tuskegee and Montgomery, but they don't wind up living 6 there. They live in our population centers, which would 7 be Montgomery or Mobile or sometimes further north, but 8 the majority of them come down this way.</p> <p>9 Q. And that was Macon County?</p> <p>10 A. Yeah. I'm talking about kids when they grow up. 11 You know, the education process, those that really get 12 educated come back this way or go to Montgomery.</p> <p>13 Q. So some of the people who are educated in Macon 14 County, leave --</p> <p>15 A. Those that are educated in the Tuskegee, Alabama 16 State area will find their way to the heavier population 17 centers for the better-paying jobs. So there's a 18 relationship there. When they come live here, they take 19 their experiences back to Macon County and say, We're 20 living a lot better in Mobile. These are things that we 21 could incorporate in Macon County, but we don't have a 22 way to get those resources here, and we don't have 23 somebody representing us here saying we need this type of 24 stuff in Macon County. So it makes a big difference.</p> <p>25 Q. So if Mobile's economy is growing and attracting</p>	<p style="text-align: right;">Page 88</p> <p>1 experience somewhere else.</p> <p>2 Q. The people who are educated in the schools of 3 Macon County, do they move to other large cities other 4 than Mobile?</p> <p>5 A. Yes.</p> <p>6 Q. And do they take ideas from those cities and 7 bring them back to Macon County?</p> <p>8 A. They do, but I would say, based on my 9 experience, most of the people that are Alabama State 10 that I'm familiar with either come back to Mobile or 11 somewhere closely surrounding Mobile and, also, Tuskegee. 12 I mean, I think if you just look at the alumni base alone 13 in the City of Mobile for those educated at Alabama State 14 and Tuskegee, you see a huge number here. So that's 15 saying a lot for that region, and then again, it's saying 16 a lot for the region that the ones that are from Macon 17 County and from these other counties that are around here 18 that attend those universities, they want to take those 19 experiences back to their home and have it grow.</p> <p>20 Q. So you said there's a large alumni base from the 21 Macon County schools?</p> <p>22 A. There's a large alumni base from Tuskegee and 23 Alabama State here.</p> <p>24 Q. In Mobile city?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 87</p> <p>1 people from Macon County, how does that directly benefit 2 Macon County, or does it?</p> <p>3 A. Well, it's attracted people from Macon County to 4 come see what's going on in Mobile, but it's like a 5 leadership exchange. They come from Macon. They're in 6 Mobile and experiencing what the differences are and what 7 should be happening, and they take those ideas back to 8 Macon, and those people in Macon incorporate those ideas 9 to the best they can. Mobile does the same thing. We go 10 to Houston, Chicago, Salt Lake City and look at the best 11 of those ideas and come back and try to incorporate them 12 in Mobile. And I know that the people of Macon would be 13 doing the same thing, especially those that have gone and 14 gotten educated and have either property or relatives of 15 people that are still living and working in Macon county.</p> <p>16 Q. So would an initiative that creates jobs in 17 Mobile necessarily create jobs for people who live in 18 Macon County?</p> <p>19 A. It may not create jobs, but it creates the idea 20 of need and what needs to be done. I mean, we are 21 creatures that see growth, and we see someone else do it, 22 but we know that we have the opportunity to do it 23 somewhere else. Then we take that idea from this area 24 and take it back over here. So the growth here and 25 experience here gives the opportunity for growth and</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. And are you familiar with any data on what 2 percentage of those go back to Macon County?</p> <p>3 A. No, I don't, but I know they're here simply 4 because of my involvement with it. I'm an HVCU grad, 5 too, like I told you. So that culture in that group I 6 see a lot of, and I talk to them, and I know what the 7 mindset is, you know. And those conversations between us 8 are, Well, my hometown needs this. You know, we might 9 not be able to go this big, but we can do this. And I 10 think if I'm seeing it in Mobile, I need to be talking to 11 the people in my hometown about what they should be doing 12 and what they can be doing there.</p> <p>13 Q. Just to clarify, are you speaking of the people 14 who go to the schools of Macon County, move to the City 15 of Mobile and just talk to the leaders of Macon County on 16 how to grow, or they move back themselves?</p> <p>17 A. Well, both. I don't know if they move back or 18 not. I can't tell you one way or another, but if they do 19 move back, then that's added value to Macon County.</p> <p>20 Q. You're not sure if they move back but --</p> <p>21 A. I never said they move back, but I'm saying if 22 they do, it's added value to Macon County. And even if 23 they don't and just communicate with leadership, that's 24 added value to Macon County.</p> <p>25 Q. And do you know people that went to Macon County</p>

<p style="text-align: right;">Page 90</p> <p>1 schools, moved to the City of Mobile and communicated 2 with leaders of Macon County to help grow? 3 A. I know people that have gone to Tuskegee and 4 Alabama State that have communicated back and forth to 5 those areas, yes.</p> <p>6 Q. What about Bullock County? What does the City 7 of Mobile have in common with Bullock County? 8 A. I don't know. I haven't been there enough to 9 know. What are the cities in Bullock County that you're 10 referring to? 11 Q. I'm just asking about the county. 12 A. I don't know. I can't talk to it. 13 Q. Are you aware of any cities in Bullock County? 14 A. If I don't have my lines crossed -- I don't 15 know, you know. And sometimes, you know, things run 16 together in your head based on what you're talking about, 17 so if I don't have my lines crossed, no. 18 Q. Do you know what the City of Mobile has in 19 common with Barbour County? 20 A. No. 21 Q. Do you know what the City of Mobile has in 22 common with Butler County? 23 A. No.</p> <p>24 Q. All right. I'm going to show you what we will 25 mark as Exhibit 4. This is the current Congressional</p>	<p style="text-align: right;">Page 92</p> <p>1 THE COURT REPORTER: "Do you know much about the 2 northeastern part of the County of Mobile that is in 3 CD-1?" 4 A. I know some. It just depends on what you're 5 asking me. 6 Q. Are you familiar with that area? 7 A. Yeah. 8 Q. Do you know what any parts of that area have in 9 common with Henry County? 10 A. This section of Mobile County is more rural than 11 other places, so it's more in line with the northern part 12 of Baldwin County when you talk about Little Rivers and 13 all of those places up along the Tensaw River coming up 14 here. So their lifestyles would be more toward the 15 Baldwin County stretch than it would be toward southern 16 and central Mobile County, if that's what you're asking 17 me. Creola, Chickasaw, Satsuma, Axis, going that way 18 would be more in tune to northern Baldwin County than it 19 would be to central and southern Mobile County. 20 Q. What would that portion of Mobile County as a 21 Congressional district one have in common with Henry 22 County, if you know? 23 A. Again, if Henry County is a rural county, then 24 that lifestyle is extremely similar in the way that 25 people accommodate themselves. If Henry County is a</p>
<p style="text-align: right;">Page 91</p> <p>1 redistricting map that's in effect right now. 2 A. Uh-huh. 3 (Exhibit 4 was marked for identification.) 4 Q. Have you seen this map before? 5 A. This is the one we're currently voting on? 6 Q. Yes, this is the one in effect in the upcoming 7 elections. 8 A. Yeah, I've seen it. 9 Q. So looking at the county of -- Well, take a 10 second to familiarize yourself with district two real 11 quickly and let me know when you're ready. 12 A. Go ahead. 13 Q. So do you see how Mobile County is in two 14 different districts? 15 A. I do. 16 Q. Do you know much about the northeastern part of 17 the County of Mobile that is in CD-1? 18 A. CD-1? 19 Q. Congressional district one. I apologize. 20 A. Be more specific. 21 MR. MAULDIN: Could you reread the question? 22 A. What do I know about the northeastern section of 23 Mobile County? 24 (Whereupon, the previous question was read back 25 by the court reporter as follows:)</p>	<p style="text-align: right;">Page 93</p> <p>1 metropolis or a military county, then it would be a 2 different lifestyle, but if it's rural, then they are 3 more likely of that same mindset of agricultural base, 4 farm-type living, large lots and things like that as 5 opposed to people that live within the central Mobile 6 area. 7 Q. What about the part of Mobile County that's in 8 CD-2 outside of the city limits? Could you in broad 9 strokes tell me what that part of the county is like? 10 A. Well, that section that's outside the city 11 limits is growing extremely fast. The population density 12 out there is changing extremely. Snow Road will probably 13 be the next Schillinger Road. 158 is probably going to 14 be our next major economic development corridor which is 15 gonna really grow, probably going to really stretch 16 Saraland a lot as far as the economy goes. So that area 17 that is west of Mobile going out there, it will 18 essentially grow to be more like the Mobile area than 19 anywhere else because of the slating and opportunities 20 for growth. 21 Q. Do you think it has anything in common with 22 Baldwin County? 23 A. No, not at all. At this point in time, it has 24 some similarities, but for future growth and quickness of 25 growth, I don't think so. Baldwin County is spread out</p>

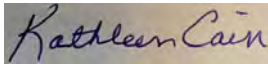
<p style="text-align: right;">Page 94</p> <p>1 so much, but this area is concentrated, and the</p> <p>2 infrastructure is already in place, where Baldwin County</p> <p>3 is just getting to the point where it's trying to get its</p> <p>4 infrastructure all throughout the county. Right now,</p> <p>5 they're more centralized in the southern part of the</p> <p>6 county with stronger infrastructure.</p> <p>7 Q. I'm going to show you what we will mark as</p> <p>8 Exhibit 5.</p> <p>9 (Exhibit 5 was marked for identification.)</p> <p>10 Q. Do you recognize this?</p> <p>11 A. This looks like a city council district map</p> <p>12 showing the districts.</p> <p>13 Q. And does this look like an accurate</p> <p>14 representation of the current city council districts that</p> <p>15 have not gone into effect, the ones excluding those</p> <p>16 that -- Strike that. The ones that are in effect until</p> <p>17 six months before the next --</p> <p>18 A. Election? So this doesn't have the</p> <p>19 reapportionment in it?</p> <p>20 Q. Correct, to account for annexation.</p> <p>21 A. It does not account --</p> <p>22 Q. Correct. Does that look like an accurate</p> <p>23 representation of your district?</p> <p>24 A. I can't tell without the street boundaries but</p> <p>25 pretty close, yeah.</p>	<p style="text-align: right;">Page 96</p> <p>1 count to make sure that the population and districts were</p> <p>2 adequately disbursed based on the census.</p> <p>3 Q. I will show you now what we will mark as Exhibit</p> <p>4 6. Actually, I'll refer you back to exhibit -- the</p> <p>5 court-ordered Congressional map that's currently in</p> <p>6 effect.</p> <p>7 A. Exhibit 2?</p> <p>8 Q. Correct. And you said you currently represent</p> <p>9 district two?</p> <p>10 A. That's correct.</p> <p>11 Q. Do you know what Congressional district or</p> <p>12 districts your city council district is in?</p> <p>13 A. Two.</p> <p>14 Q. Is the entirety of it?</p> <p>15 A. I want to say yes. I can't really tell based on</p> <p>16 this, but -- If I could tell where that line was right</p> <p>17 there -- If I knew what this line was right here, I could</p> <p>18 tell you. I just don't know where that line is. Do you</p> <p>19 see that line right here?</p> <p>20 Q. Yeah.</p> <p>21 A. I don't know where that is, if that's Chickasaw,</p> <p>22 Prichard or whatever, but if this line here goes into</p> <p>23 Prichard, then this is probably 90 percent or 100 percent</p> <p>24 in district two.</p> <p>25 Q. But as you sit here today, you're not sure?</p>
<p style="text-align: right;">Page 95</p> <p>1 Q. And how long have you represented that district?</p> <p>2 A. The last three years.</p> <p>3 Q. And then you represented it --</p> <p>4 A. Eight years prior.</p> <p>5 Q. So a total of 11 years you've represented that</p> <p>6 district?</p> <p>7 A. Yes.</p> <p>8 Q. Have the boundaries of your district changed</p> <p>9 since you've been in office?</p> <p>10 A. Yes.</p> <p>11 Q. And how so?</p> <p>12 A. Sections of Maysville are now within district</p> <p>13 two that were not there when I was last there that</p> <p>14 stretches down to Hurtel Street now through Maysville and</p> <p>15 over to Holcombe and down Center and Williams Street,</p> <p>16 which were not part of district two. On the northern</p> <p>17 end, it shrank some just a little bit from the last time</p> <p>18 I was in office, too. So it's been a little change.</p> <p>19 Q. And is your district going to change any for the</p> <p>20 next city council district?</p> <p>21 A. Yes, it will.</p> <p>22 Q. In what ways?</p> <p>23 A. It's going to actually expand due to the</p> <p>24 annexation, but the annexation we -- but the annexation</p> <p>25 maps were drawn in representation of the 2020 census</p>	<p style="text-align: right;">Page 97</p> <p>1 A. I'm not 100 percent sure, but it looks like all</p> <p>2 of it.</p> <p>3 (Exhibit 6 was marked for identification.)</p> <p>4 Q. I'm going to show you Exhibit 6, which is a map</p> <p>5 of your Congressional districts and your city council</p> <p>6 districts.</p> <p>7 MS. RUTAHINDURWA: And, Counsel, how was this</p> <p>8 map drawn?</p> <p>9 MR. MAULDIN: The attorney general's office</p> <p>10 created that.</p> <p>11 A. So this is my district. So all of my district</p> <p>12 is in here except for the Port of Chickasaw, which has no</p> <p>13 population base up there.</p> <p>14 Q. So the Port of Chickasaw, where is that in this</p> <p>15 map?</p> <p>16 A. Up here.</p> <p>17 Q. I'm sorry. I can't see.</p> <p>18 A. My district extends all the way up here, which</p> <p>19 some of this is the city limits of Mobile.</p> <p>20 Q. And what's the population there, you said?</p> <p>21 A. Zero.</p> <p>22 Q. Zero?</p> <p>23 A. Yeah. I think that matches right there.</p> <p>24 Q. And can you look at the southeast portion of</p> <p>25 your district?</p>

<p style="text-align: right;">Page 98</p> <p>1 A. Southeast? Okay.</p> <p>2 Q. Is there another part of your district that is</p> <p>3 in Congressional district two?</p> <p>4 A. Say what? Is there another part of my district</p> <p>5 that's in Congressional district two? This right here is</p> <p>6 what you're asking about?</p> <p>7 Q. Is that part of your district?</p> <p>8 A. I can't tell where the river is, based on this.</p> <p>9 Where is the river? Where is the bay? Here is district</p> <p>10 three. I believe that's district three. I can't really</p> <p>11 tell based on what I'm looking at, and I don't know if</p> <p>12 the line is drawn the same. Here we are out here. It's</p> <p>13 down there and comes out. That's out in the water, just</p> <p>14 that little sliver, and I think that little sliver is the</p> <p>15 channel. So, no.</p> <p>16 Q. Do you still have the exhibit that is the color</p> <p>17 of your --</p> <p>18 A. I'm trying to match it up. This line right</p> <p>19 here? Do you see this line right here?</p> <p>20 Q. Yes.</p> <p>21 A. That is the outline that's out here in the river</p> <p>22 that you're looking at. So that is all out here. When</p> <p>23 this line goes here, that is all out here. That's all</p> <p>24 outside -- That's all district three. Do you see that?</p> <p>25 That's all district three. This little piece right here</p>	<p style="text-align: right;">Page 100</p> <p>1 A. As district two? Yes. My district is heavily</p> <p>2 Democrat, and it lends itself toward the ability to elect</p> <p>3 someone that may be Democrat or a minority. My district</p> <p>4 is 62 percent black and 38 percent white and other. So</p> <p>5 when you look at the demographics of the inner city being</p> <p>6 Democrat and minority, yes. It lends itself to the</p> <p>7 ability of people that would like to see another minority</p> <p>8 elected to Congress in the State of Alabama, the ability</p> <p>9 to pick a person of their choice.</p> <p>10 Q. So just to clarify, should your district be in</p> <p>11 CD-1 because they're Democrats or because they're</p> <p>12 minorities?</p> <p>13 MS. RUTAHINDURWA: Object to the form.</p> <p>14 A. CD-1?</p> <p>15 Q. Congressional district one.</p> <p>16 A. No, you mean Congressional district two.</p> <p>17 Q. Yes.</p> <p>18 A. Yes, because like I told you before, most</p> <p>19 minorities are Democrats, and the voting block within the</p> <p>20 city is more purple than it is red. So it lends itself</p> <p>21 to the ability of a Democrat or minority being able to</p> <p>22 select someone of their choice.</p> <p>23 Q. When the legislature is redistricting, do you</p> <p>24 think they should assume that most minorities are</p> <p>25 Democrats?</p>
<p style="text-align: right;">Page 99</p> <p>1 that you're asking me about looks like that is the Mobile</p> <p>2 River itself by the island, but I can't tell because</p> <p>3 right here, these two lumps right here, that encompasses</p> <p>4 the island out here. So it looks like you've got every</p> <p>5 bit of district two on this, and I can't tell if this</p> <p>6 little, tiny piece right here may be right in there, and</p> <p>7 I can't really make it out based on this because it</p> <p>8 doesn't look the same. This piece, it juts out right</p> <p>9 there, which is right there at that island. So I'm going</p> <p>10 to say just about all of my district is in this map. I</p> <p>11 just can't really make it out based on this cutback right</p> <p>12 here because I don't know what this cutback is.</p> <p>13 That comes across, comes out. See, and that</p> <p>14 comes up the channel right there. That's all in the</p> <p>15 district. So somehow or another -- And, really, there's</p> <p>16 nothing out here except for oil refineries and port</p> <p>17 stuff.</p> <p>18 Q. What do you mean by "port stuff"?</p> <p>19 A. Well, you have planes -- I think the planes</p> <p>20 company, some of their oil storage tanks are out there.</p> <p>21 Other oil and energy companies are out there, but there's</p> <p>22 no living population out there, no voting population out</p> <p>23 there.</p> <p>24 Q. Do you think your city council district should</p> <p>25 be in the same Congressional district?</p>	<p style="text-align: right;">Page 101</p> <p>1 MS. RUTAHINDURWA: Object to the form.</p> <p>2 A. Most of us have the voting demographics of the</p> <p>3 State of Alabama based on both party and race. So we</p> <p>4 know which races are voting which way, and we know which</p> <p>5 people or which individuals that are not minorities are</p> <p>6 voting. That's a known fact. And, plus, the state</p> <p>7 records how those blocks are voting, so that's a known</p> <p>8 fact. So that's how the state itself chose to draw its</p> <p>9 lines, also, or took the opportunity to attempt to draw</p> <p>10 lines based on voting demographics in people.</p> <p>11 So it's not totally about black or white. It's</p> <p>12 about philosophy, ethnic groups, Democrat, Republican.</p> <p>13 It's the whole gamut. I mean, there might be someone</p> <p>14 white elected as a Democrat that's from Congressional</p> <p>15 district two as opposed to someone black. But people of</p> <p>16 color or another minority would like to see another</p> <p>17 minority elected to the Congress.</p> <p>18 Q. So speaking of representatives, are you familiar</p> <p>19 with Barry Moore at all?</p> <p>20 A. No.</p> <p>21 Q. Have you heard that name?</p> <p>22 A. A ton. I don't know him enough to comment one</p> <p>23 way or another on his philosophy. I just know he's a</p> <p>24 Republican. And, no, he doesn't know much about over</p> <p>25 here at all.</p>

<p style="text-align: right;">Page 102</p> <p>1 Q. So if he were the representative for 2 Congressional district one, which includes Baldwin County 3 and parts of Mobile County, do you think he would 4 understand --</p> <p>5 A. I think he has a huge learning curve when it 6 comes to knowing what's gonna happen at the port and the 7 lower part of this county. I think -- I don't know how 8 people -- how conservatives, you know, think amongst 9 themselves or their philosophy, but I think, in essence, 10 just listening to the campaign, he just out -- How did 11 they say? Out-Republicaned or was more conservative than 12 the other guy himself which probably got him more votes 13 from southern Mobile County than anywhere else.</p> <p>14 Q. And do you agree it's best for the Gulf Coast 15 region for Congressional district one and Congressional 16 district two to have representatives who understand the 17 Port of Mobile?</p> <p>18 A. I think that both of them are going to have to 19 understand what's happening at the port and how the 20 economy is driven in the City of Mobile. And the port is 21 big simply because of the State of Alabama. That's 22 probably going to be the biggest issue when it comes to 23 the two of them working together, in my mind.</p> <p>24 Q. What do you think will be the biggest issue with 25 the two of them working together? Just lack of</p>	<p style="text-align: right;">Page 104</p> <p>1 A. As far as?</p> <p>2 Q. Their economy.</p> <p>3 A. Well, for the people that work over there, if 4 jobs were lost, possibly, yes. But when you're talking 5 about major ripples, I'm talking about there's some type 6 of roadblock or you get too blocked and no one can come 7 to a decision or the help that's needed or not needed 8 doesn't get to one point when it should, or it gets there 9 but it's needed somewhere else. Then we're creating a 10 harm, if you understand what I mean there.</p> <p>11 Q. So if the representative from CD-1 did not 12 understand the Mobile Bay, the ports, the City of Mobile, 13 will that harm the City of Mobile?</p> <p>14 A. Yes.</p> <p>15 Q. And I believe earlier, you said that so goes the 16 City of Mobile, so goes Alabama?</p> <p>17 A. So goes Alabama, so goes the region. There's a 18 lot that the state depends on that comes through Mobile.</p> <p>19 Q. So would it still be speculation for you to 20 estimate who all would be harmed by --</p> <p>21 A. Well, you know, so goes Mobile, so goes the 22 State of Alabama is a cliché. I'm pretty sure you know 23 that. But the honest opinion of that is that so many 24 things needed throughout the state comes through our 25 port, comes through our rails. It's brought into the</p>
<p style="text-align: right;">Page 103</p> <p>1 understanding?</p> <p>2 A. Well, funding of the port and making sure the 3 initiatives of that huge economic driver are able to go 4 forward and being able to come to some type of compromise 5 and agreements between ideology, you know, how much money 6 should we spend, when should we spend it and why should 7 we spend it. Should so much money go there, or should we 8 be putting money in other places also based on what the 9 needs of others are? You know, the port makes a lot of 10 money and is extremely profitable, but do we always have 11 to put 10 or 20 million dollars there when there's extra 12 funding? Could that money go somewhere else at the time?</p> <p>13 So the two of them have to work together 14 tremendously to make sure funding goes to the places that 15 really need it when funding can be deferred from places 16 like the port for a year or two. It opens the odds to 17 underfunded and underserved neighborhoods when you have 18 someone that understands all of it.</p> <p>19 Q. Who all would be harmed in the State of Alabama 20 by having one representative not understand --</p> <p>21 A. I can't answer that question of who all is going 22 to be harmed because the ripple effect may be bigger than 23 my realm of knowledge. So I can't answer that direct. 24 You're asking me to speculate. I can't.</p> <p>25 Q. Do you think it would harm Baldwin County?</p>	<p style="text-align: right;">Page 105</p> <p>1 port, loaded on the rails here and taken everywhere else 2 logistically. You know, a lot of stuff happens that way. 3 So if you harm the port, then you have the opportunity to 4 harm business in other places unintentionally, and if you 5 don't understand that process and how it works and you 6 have two people thinking two different mindsets 7 sometimes, then I think the new guy which hasn't been 8 around, which would be Barry Moore, would have a learning 9 curve because he could actually be doing unintended harm, 10 you know.</p> <p>11 But still yet, does that say that we don't want 12 Mobile split? The answer to that is no because, you 13 know, you need to be able to use that population center 14 and things to drive the need to accomplish a second 15 minority-majority district.</p> <p>16 Q. Do y'all want to take a short five-minute break, 17 and I think we should be able to wrap up fairly soon?</p> <p>18 (An off-the-record break was taken, after which 19 the following occurred:)</p> <p>20 BY MR. MAULDIN:</p> <p>21 Q. Do you know Caroleene Dobson?</p> <p>22 A. No, I don't know her.</p> <p>23 Q. Do you know the name?</p> <p>24 A. I do.</p> <p>25 Q. Do you know who she is?</p>

<p style="text-align: right;">Page 106</p> <p>1 A. No. I've seen her on television. That's about 2 it, never met her. 3 Q. Do you know if she's running for any political 4 office? 5 A. She's running for Congressional district two. 6 Q. Do you know where she's from? 7 A. Somewhere -- Somewhere around Monroeville, I 8 think. I don't know. 9 Q. But as far as you're aware, she's not from the 10 City of Mobile? 11 A. She's not. 12 Q. Do you know if she understands the City of 13 Mobile? 14 A. No, I don't. 15 Q. How would it harm the City of Mobile if neither 16 representative from CD-2 or CD-1 understood the City and 17 the bay? 18 MS. RUTAHINDURWA: Object to the form. 19 A. That could be an issue, especially when they 20 don't know the people, don't know the culture, don't know 21 the business, don't know how it works. They have to 22 spend a lot of time here to understand how the economy 23 affects the region. 24 Q. So if you were to be called at trial in this 25 case, is there anything related to your -- based off your</p>	<p style="text-align: right;">Page 108</p> <p>1 majority district or a fourth black district if the 2 people chose to elect someone of color or someone of 3 their choosing. That was done before annexation because 4 if you did it after annexation, the population of 5 annexation would have dictated that. But we did it 6 correctly and did it before annexation and got district 7 7 to be 53/41, which now lends itself to the opportunity of 8 having a fourth minority elected to the council if they 9 were to so choice to. 10 So I would say to you and to the people of the 11 State of Alabama that the process has to be done right so 12 that based on population in the 2020 census count, that 13 we first get the lines done right so that there is an 14 opportunity for the people to elect someone of their 15 choosing, if they so choose to. 16 Q. And so why would redistricting after annexation 17 have prevented a fourth majority-minority district? 18 A. You're bringing in -- Annexation had to be done 19 in such a way that the population growth did not flip the 20 demographics of the city. So if you flip the 21 demographics of the city before redistricting, then you 22 restrict the ability to create a fourth minority-majority 23 district. But if the districts were done first, then by 24 law, you can't flip it, based on the Voting Rights Act. 25 Q. So how many city councilmen?</p>
<p style="text-align: right;">Page 107</p> <p>1 experience in political office, that you would want to 2 tell the court that you haven't told us to here today? 3 A. I don't know. It depends on how the questions 4 are asked. I'd try to be as honest as possible, so I 5 don't know. 6 Q. But is there anything that you would really want 7 them to hear in this lawsuit about your experiences in 8 political office? 9 A. There's a huge need for additional 10 representation for those that are unrepresented, based on 11 population. And getting this done in the correct manner 12 provides for that representation that hasn't been there 13 for voices that are underserved and unheard. 14 Q. And is there anything, any information related 15 to your constituents that you would want the court to 16 hear that you haven't told us today? 17 A. Well, we went through the same type of 18 redistricting here in the City of Mobile after the last 19 election cycle based on census count. And coming into 20 office, the first thing that I told the mayor and I told 21 everybody, even in my inaugural address, is that if we 22 were going to annex and grow, it had to be done right, 23 which meant that redistricting based on the census count 24 and population have to be done first, and those 25 percentages have to be right to ensure a fourth minority-</p>	<p style="text-align: right;">Page 109</p> <p>1 A. Seven. 2 Q. And four are from -- 3 A. Three. 4 Q. Three are from majority? 5 A. Three are black. Four are white. 6 Q. But are four the district majority-minority? 7 A. They are now after the last election cycle. So 8 this coming election cycle will be the chance for someone 9 to pick someone else, but I think the representative out 10 there does a great job, and everyone loves her. So I 11 think she'll be reelected, but if she ever chooses not to 12 run again, then the opportunity for a seat to be chosen 13 based on -- They'll have the opportunity to choose 14 someone of minority, black or white or whatever based on 15 their choosing at that point in time based on 16 demographics. 17 Q. So why four out of the seven majority-minority? 18 Where does that number come from? 19 A. What do you mean by "four out of seven"? 20 Q. So you said when you decided to annex, you 21 needed to do redistricting first to make sure there were 22 four. 23 A. Let me tell you why. Right now, the City of 24 Mobile only has three black elected officials and four 25 white. A lot of times, when it comes to placement of</p>

<p style="text-align: right;">Page 110</p> <p>1 funds in areas that are underserved, we get outvoted 2 because it goes down racial lines a lot, and it has in 3 the past, four to three. The City of Mobile, based on 4 the Zoghby Act, has a super majority rule which forces 5 everybody to talk to each other. So you have to actually 6 have five votes to pass anything. So that was a way to 7 establish a way to make sure that those areas weren't 8 left out. But a lot of times, you can't get to that 9 five/two because there's no compromise on philosophies 10 between, you know, the demographics and the philosophy of 11 the people that you represent in your district. 12 Q. So why four majority-minority districts instead 13 of five? 14 MS. RUTAHINDURWA: Object to the form. 15 A. The state law, Zoghby act, only allows for seven 16 districts. So even with population growth, there will 17 never be an eighth. 18 Q. Why not five out of seven? 19 A. Well, because, one, the population doesn't 20 really allow for it right now, and we cannot redraw -- 21 well, basically, it would be impossible to redraw the 22 lines to get five minority-majority districts in the City 23 of Mobile. 24 Q. When you said "the population doesn't allow for 25 it," what do you mean?</p>	<p style="text-align: right;">Page 112</p> <p>1 in the city still is the primary population of the city. 2 Q. And so you said if you were to testify at trial, 3 you would want to tell the court about your experience 4 redistricting with the city? 5 A. Because it's extremely similar. You know, to 6 reapportion to make sure that the current minority 7 districts are protected but also the creation of a 8 fourth, you know, for people of minorities living in that 9 area to have the opportunity to elect someone they choose 10 is very important, especially when there are more 11 minorities in that district than there were of the 12 majority. 13 Q. So did proportionality of representation have 14 any influence in the decision to have four majority- 15 minority districts? Did the percentage of the black 16 population in the City of Mobile correspond to the amount 17 of districts they had in Mobile? 18 A. No. There were more blacks in the number of 19 districts we had. So according to the census count, 20 there should have been a fourth minority district, and 21 there wasn't. And that's happened twice since I've been 22 in office; where before, there was an increase in 23 minority population, somewhere between 2005 and 2012, but 24 we didn't reapportion to do that because we couldn't get 25 the votes on the council from the other members to do a</p>
<p style="text-align: right;">Page 111</p> <p>1 A. The way the population centers are, you can't 2 draw the lines without crisscrossing districts and 3 breaking lines and cutting through streets. You can't do 4 it. 5 Q. What percentage of the Mobile annexation -- the 6 populations that were brought into the City of Mobile, 7 what percentage of those are black? 8 A. I don't remember, but it was a nice percentage, 9 enough not to flip the current balance. And I haven't 10 looked at those numbers in a while, so I don't remember. 11 Q. Do you think it's close to 50/50? 12 A. It may have been, yeah. I just don't remember 13 right now. Yeah, it may have been. I mean, that was a 14 huge conversation, and I'm ashamed I can't remember right 15 now. 16 Q. I'm sorry? 17 A. I said I'm ashamed that I can't remember, but 18 right now, I've got a lot going on in my head with 19 everything else going on. 20 Q. Did annexation lower the black population's 21 percentage in the City of Mobile? 22 A. Very small, but it did. 23 Q. Approximately? 24 A. Maybe one or two percent, but it still left us 25 with a majority-minority city. The population of blacks</p>	<p style="text-align: right;">Page 113</p> <p>1 referendum for annexation, which blocked it. But this 2 time, we were able to get there. 3 Q. And you said that you would want to tell the 4 court about the redistricting process because it's so 5 similar. 6 A. Yes. 7 Q. Do you think that the court should take a 8 similar approach to the City of Mobile in redistricting? 9 A. Well, Mobile was really an extreme effort from 10 both citizens groups, outside help -- It had help from 11 the Southern Poverty Law Center to really get an 12 understanding into the mayor's office of what was truly 13 needed based on the Voting Rights Act and also the census 14 count, as it goes hand in hand. And I think that the 15 whole state needs to be aware of that, that there's law 16 in place that governs how we do this, and we just can't 17 overlook it and arbitrarily do what we want to protect 18 whether or not we want Republicans in control or we don't 19 want a minority-majority here. We need to just follow 20 the law and keep going. 21 Q. And if you were to testify at trial, is there 22 anything about relevant communities of interest you would 23 want to tell the court that you haven't told us here 24 today? 25 A. Again, I'd have to look at that a little bit</p>

<p style="text-align: right;">Page 114</p> <p>1 more based on what I've already told you. Communities of 2 interest, if it's the way you said, are important if they 3 create enough equity of people or equitable population to 4 create another district that is or has the opportunity of 5 them to elect someone of their choosing, whether they're 6 Democrat white or black. 7 Q. All right. That's all I have. I'll pass it on 8 to other counsel. 9 MS. RUTAHINDURWA: I don't have any questions. 10 Dorman, do you have any questions? 11 MR. WALKER: I have no questions. Thank you, 12 Councilman, for coming in today. 13 FURTHER, THE DEPONENT SAYETH NOT. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 116</p> <p>1 Makeba Rutahindurwa 2 mrutahindurwa@elias.law 3 September 19, 2024 4 RE: Caster, Marcus, Et Al v. Allen, Wes 5 9/5/2024, Councilman William Carroll (#6884409) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 Deponent and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 cs-southeast@veritext.com. 16 Return completed errata within 30 days from 17 receipt of testimony. 18 If the witness fails to do so within the time 19 allotted, the transcript may be used as if signed. 20 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>
<p style="text-align: right;">Page 115</p> <p>1 CERTIFICATE 2 3 STATE OF ALABAMA) 4 COUNTY OF MOBILE) 5 6 I hereby certify that the above and foregoing 7 deposition was taken down by me in stenotype and 8 transcribed by means of computer-aided transcription, and 9 that the foregoing is a true and correct transcript of 10 the testimony given by said witness upon said hearing. 11 I further certify that I am neither of counsel 12 nor of kin to any of the parties, nor am I in anywise 13 interested in the result of said cause. 14 I further certify that I am duly licensed by the 15 Alabama Board of Court Reporting as a Certified Court 16 Reporter as evidenced by the ACCR number following my 17 name found below. 18 19 20 21 22 23 24 25</p> <div data-bbox="418 1707 683 1770" data-label="Text">  </div> <p>KATHLEEN CAIN, RPR, ACCR302 NOTARY PUBLIC MY COMMISSION EXPIRES: 11/8/27</p>	<p style="text-align: right;">Page 117</p> <p>1 Caster, Marcus, Et Al v. Allen, Wes 2 Councilman William Carroll (#6884409) 3 E R R A T A S H E E T 4 PAGE____ LINE____ CHANGE_____ 5 _____ 6 REASON_____ 7 PAGE____ LINE____ CHANGE_____ 8 _____ 9 REASON_____ 10 PAGE____ LINE____ CHANGE_____ 11 _____ 12 REASON_____ 13 PAGE____ LINE____ CHANGE_____ 14 _____ 15 REASON_____ 16 PAGE____ LINE____ CHANGE_____ 17 _____ 18 REASON_____ 19 PAGE____ LINE____ CHANGE_____ 20 _____ 21 REASON_____ 22 _____ 23 _____ 24 Councilman William Carroll Date 25</p>

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1 Caster, Marcus, Et Al v. Allen, Wes

2 Councilman William Carroll (#6884409)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Councilman William Carroll, do hereby declare that I

5 have read the foregoing transcript, I have made any

6 corrections, additions, or changes I deemed necessary as

7 noted above to be appended hereto, and that the same is

8 a true, correct and complete transcript of the testimony

9 given by me.

10

11 _____

12 Councilman William Carroll Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20__.

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

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