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LEE LAWSON 30(b)(6)
EVAN MILLIGAN vs WES ALLENSeptember 04, 2024
DISTRICT COURT
N.D. OF ALABAMA
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<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5</p> <p>6 * * * * *</p> <p>7 EVAN MILLIGAN, et al.,</p> <p>8 Plaintiffs,</p> <p>2:21-CV-015330-AMM</p> <p>9 v.</p> <p>10 WES ALLEN, et al.,</p> <p>11 Defendants.</p> <p>12 * * * * *</p> <p>13</p> <p>14</p> <p>15</p> <p>16 The 30(b)(6) Deposition of BALDWIN COUNTY</p> <p>17 ECONOMIC DEVELOPMENT ALLIANCE, taken</p> <p>18 through its representative, LEE LAWSON,</p> <p>19 at the offices of the Baldwin County</p> <p>20 Economic Development Alliance,</p> <p>21 1100 Fairhope Avenue, Fairhope, Alabama,</p> <p>22 on September 4, 2024, commencing at</p> <p>23 approximately 1:00 p.m. Central Time.</p> <p>24</p> <p>25</p>	<p>1 I N D E X</p> <p>2 DEPOSITION OF LEE LAWSON, 9/4/2024</p> <p>3</p> <p>4 EXAMINATION INDEX</p> <p>5 BY MR. CAMPBELL-HARRIS 6</p> <p>6</p> <p>7</p> <p>8 EXHIBIT INDEX</p> <p>9 Exhibit 1 Declaration of Lee Lawson, 20</p> <p>8/4/2023 - 5 pg</p> <p>10</p> <p>11 Exhibit 2 BCEDA tweet, 8/7/2024, 27</p> <p>Construction for Gulf Shores</p> <p>International Airport Commercial</p> <p>Terminal - 1 pg</p> <p>12</p> <p>13 Exhibit 3 2023 Alabama Tourism Economic 35</p> <p>Report - 40 pg</p> <p>14</p> <p>15 Exhibit 4 Major Employers - Wiregrass 50</p> <p>Economic Development Corporation</p> <p>- 8 pg</p> <p>16</p> <p>17 Exhibit 5 Baldwin by the Numbers - 12 pg 60</p> <p>18</p> <p>19 Exhibit 6 Priced Out of Florida, More 67</p> <p>Retirees Are Trying This Sunbelt</p> <p>State on For Size - WSJ - 7 pg</p> <p>20</p> <p>21 Exhibit 7 Livingston Congressional Map 3 - 68</p> <p>2 pg</p> <p>22</p> <p>23 Exhibit 8 Court-Enacted Congressional Plan 73</p> <p>- 1 pg</p> <p>24</p> <p>25</p>
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<p>1 A P P E A R A N C E S</p> <p>2 APPEARING ON BEHALF OF THE PLAINTIFFS:</p> <p>3 DAYTON CAMPBELL-HARRIS, ESQ. (via videoconference)</p> <p>dcampbell-harris@aclu.org</p> <p>4 DAVIN M. ROSBOROUGH, ESQ. (via videoconference)</p> <p>drosborough@aclu.org</p> <p>5 AMERICAN CIVIL LIBERTIES UNION FOUNDATION</p> <p>P.O. Box 2728</p> <p>6 Seattle, WA 98111-2728</p> <p>425-516-8400</p> <p>7</p> <p>8 LALI MADDURI, ESQ. (via videoconference)</p> <p>lmadduri@elias.law</p> <p>ELIAS LAW GROUP</p> <p>9 250 Massachusetts Ave NW, Suite 400</p> <p>Washington, DC 20001</p> <p>202-968-4593</p> <p>10</p> <p>11</p> <p>12 APPEARING ON BEHALF OF THE COCHAIRS; RANDY</p> <p>HINAMAN, STEVE LIVINGSTON, and CHRIS PRINGLE:</p> <p>13</p> <p>14 RILEY KATE LANCASTER, ESQ. (via videoconference)</p> <p>rlancaster@balch.com</p> <p>BALCH & BINGHAM, LLP</p> <p>15 1901 Sixth Avenue North, Suite 1500</p> <p>Birmingham, AL 35203-4642</p> <p>205-226-8767</p> <p>16</p> <p>17</p> <p>18 APPEARING ON BEHALF OF THE SECRETARY OF STATE,</p> <p>WES ALLEN:</p> <p>19</p> <p>20 CHARLES MCKAY, ESQ.</p> <p>charles.mckay@alabamaag.gov</p> <p>DYLAN MAULDIN, ESQ.</p> <p>21 dylan.mauldin@alabamaag.gov</p> <p>OFFICE OF THE ATTORNEY GENERAL</p> <p>22 501 Washington Avenue</p> <p>Montgomery, Alabama 36130</p> <p>334-353-8674</p> <p>23</p> <p>24</p> <p>25 COURT REPORTER:</p> <p>DEBRA AMOS ISBELL, CCR,RDR,CRR - ACCR #21</p>	<p>1 S T I P U L A T I O N S</p> <p>2</p> <p>3 IT IS STIPULATED AND AGREED by and</p> <p>4 between the parties through their respective</p> <p>5 counsel that the deposition of LEE LAWSON</p> <p>6 may be taken before Debra Amos Isbell,</p> <p>7 Commissioner, at the offices of the Baldwin</p> <p>8 County Economic Development Alliance,</p> <p>9 1100 Fairhope Avenue, Fairhope, Alabama, on</p> <p>10 the 4th day of September 2024.</p> <p>11</p> <p>12 IT IS FURTHER STIPULATED AND AGREED</p> <p>13 that the signature to and the reading of the</p> <p>14 deposition by the witness is waived, the</p> <p>15 deposition to have the same force and effect</p> <p>16 as if full compliance had been had with all</p> <p>17 laws and rules of Court relating to the taking</p> <p>18 of depositions.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 5</p> <p>1 IT IS FURTHER STIPULATED AND AGREED</p> <p>2 that it shall not be necessary for any</p> <p>3 objections except as to form or leading</p> <p>4 questions, and that counsel for the parties</p> <p>5 may make objections and assign grounds at the</p> <p>6 time of the trial, or at the time said</p> <p>7 deposition is offered in evidence or prior</p> <p>8 thereto.</p> <p>9</p> <p>10 IT IS FURTHER STIPULATED AND AGREED</p> <p>11 that the notice of filing of the deposition by</p> <p>12 the Commissioner is waived.</p> <p>13</p> <p>14</p> <p>15 I, Debra Amos Isbell, Commissioner and</p> <p>16 Court Reporter, certify that on this date, as</p> <p>17 provided by the Federal Rules of Civil Procedure</p> <p>18 and the foregoing stipulation of counsel, there</p> <p>19 came before me at the offices of the Baldwin County</p> <p>20 Economic Development Alliance, 1100 Fairhope</p> <p>21 Avenue, Fairhope, Alabama, on September 4, 2024,</p> <p>22 commencing at 1:00 p.m., LEE LAWSON, witness in the</p> <p>23 above cause, for oral examination, whereupon the</p> <p>24 following proceedings were had:</p> <p>25</p>	<p style="text-align: right;">Page 7</p> <p>1 Is that okay?</p> <p>2 A. Yes, that is okay.</p> <p>3 Q. Thank you.</p> <p>4 You understand that you are testifying</p> <p>5 under oath today?</p> <p>6 A. Yes.</p> <p>7 Q. And everything is being transcribed, so</p> <p>8 we both need to speak clearly and avoid speaking</p> <p>9 over one another.</p> <p>10 Is that okay?</p> <p>11 A. Yes.</p> <p>12 Q. We have a court reporter here. She is</p> <p>13 going to transcribe our conversation. So please</p> <p>14 make sure that our responses are verbal because the</p> <p>15 court reporter cannot take down gestures or grunts.</p> <p>16 Okay?</p> <p>17 A. Okay.</p> <p>18 Q. Are you represented by counsel today?</p> <p>19 A. I am not.</p> <p>20 Q. Okay. I see that there are other</p> <p>21 attorneys on the Zoom in attendance for other</p> <p>22 parties. If counsel or others on Zoom begin</p> <p>23 speaking when I complete a question, please give</p> <p>24 them a moment to get any objection on the record</p> <p>25 and let's try, again, to avoid speaking over one</p>
<p style="text-align: right;">Page 6</p> <p>1 THE COURT REPORTER: Are we working under</p> <p>2 any stipulations or no stipulations?</p> <p>3 MR. CAMPBELL-HARRIS: Usual stipulations,</p> <p>4 keep objections to form, privilege. And if the</p> <p>5 witness wishes to read and sign, he's welcome to.</p> <p>6 THE COURT REPORTER: Would you raise your</p> <p>7 right hand, please.</p> <p>8 LEE LAWSON</p> <p>9 was sworn and testified as follows:</p> <p>10 THE WITNESS: Yes.</p> <p>11 EXAMINATION</p> <p>12 BY MR. CAMPBELL-HARRIS:</p> <p>13 Q. Good afternoon again, Mr. Lawson. My</p> <p>14 name is Dayton Campbell-Harris. It's a pleasure to</p> <p>15 see you again. And I represent the plaintiffs in</p> <p>16 Milligan v. Allen.</p> <p>17 Mr. Lawson, you have been deposed before;</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. Besides in this case, have you been</p> <p>21 deposed in any other legal matters?</p> <p>22 A. No, I have not.</p> <p>23 Q. Okay. I'm going to go over some</p> <p>24 logistical points concerning depositions before we</p> <p>25 jump into the substance of today's deposition.</p>	<p style="text-align: right;">Page 8</p> <p>1 another as they get that objection onto the record.</p> <p>2 Okay?</p> <p>3 A. Okay.</p> <p>4 Q. Once the objection is stated, you should</p> <p>5 answer my question unless I withdraw it or unless</p> <p>6 your counsel specifically instructs you not to</p> <p>7 answer the question. But because you don't have</p> <p>8 counsel, you can just answer the question. Okay?</p> <p>9 A. Okay.</p> <p>10 Q. If you do not understand a question I</p> <p>11 ask, please just let me know, and I will try to</p> <p>12 rephrase or explain the question. If you answer a</p> <p>13 question, I'll assume you understood it. Okay?</p> <p>14 A. Okay.</p> <p>15 Q. If you need a break at any point, please</p> <p>16 just let me know, and I'll try to do my best to</p> <p>17 accommodate as long as there's no question pending.</p> <p>18 All right?</p> <p>19 A. Sounds good.</p> <p>20 Q. Okay. Is there anything that might</p> <p>21 prevent you from understanding my questions or</p> <p>22 otherwise answering my questions truthfully today?</p> <p>23 A. No, there is not.</p> <p>24 Q. Okay. Where are you right now?</p> <p>25 A. I am sitting in my office conference room</p>

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<p style="text-align: right;">Page 9</p> <p>1 in Fairhope, Alabama.</p> <p>2 Q. Okay. Is there anyone else in that</p> <p>3 conference room with you?</p> <p>4 A. Yes. There are three other individuals</p> <p>5 in the conference room with me.</p> <p>6 Q. And who are those individuals?</p> <p>7 A. The court reporter, Ms. Debbie Isbell.</p> <p>8 We have Charles McKay.</p> <p>9 THE WITNESS: Remind me of your name</p> <p>10 again.</p> <p>11 MR. MAULDIN: Dylan Mauldin.</p> <p>12 A. And Dylan Mauldin with the Alabama</p> <p>13 Attorney General's Office.</p> <p>14 Q. Okay. Thank you.</p> <p>15 Do you have this Zoom open on your own</p> <p>16 personal computer?</p> <p>17 A. This is my work computer.</p> <p>18 Q. Okay. Do you have any email chats or any</p> <p>19 other messaging functions up on your computer</p> <p>20 screen at this time?</p> <p>21 A. I do not. All those applications are</p> <p>22 currently closed on my desktop.</p> <p>23 Q. Okay. Did you prepare for your</p> <p>24 deposition today?</p> <p>25 A. Yes, I did.</p>	<p style="text-align: right;">Page 11</p> <p>1 deposition?</p> <p>2 A. I have not.</p> <p>3 Q. Okay. Have you ever seen a transcript</p> <p>4 from any other depositions in this case?</p> <p>5 A. Just my previous deposition. That's the</p> <p>6 only transcript I've seen.</p> <p>7 Q. Okay. Did you visit any websites in</p> <p>8 preparation for your deposition today?</p> <p>9 A. I have not.</p> <p>10 Q. Okay. Did you review any documents to</p> <p>11 prepare for today's deposition?</p> <p>12 A. Just my declaration.</p> <p>13 Q. Nothing else?</p> <p>14 A. Nothing else.</p> <p>15 Q. Okay. Thank you.</p> <p>16 Are you being compensated by anyone to be</p> <p>17 here today?</p> <p>18 A. I am not.</p> <p>19 Q. Since we last spoke in August 2023, have</p> <p>20 you had any further involvement in this lawsuit?</p> <p>21 A. I have not.</p> <p>22 Q. Okay. Are you a member of the Republican</p> <p>23 party?</p> <p>24 A. What constitutes a member of the</p> <p>25 Republican party?</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. What did you do to prepare?</p> <p>2 A. I had one phone conversation with Charles</p> <p>3 McKay to understand the timing and the setting and</p> <p>4 logistics of things, and then I also reread my</p> <p>5 statement, declaration, whatever you guys refer to</p> <p>6 it as. But I read back over that because it's been</p> <p>7 a minute since I revisited it.</p> <p>8 Q. When did you have that conversation with</p> <p>9 Mr. McKay?</p> <p>10 A. Yesterday.</p> <p>11 Q. Okay. And do you recall how long,</p> <p>12 approximately, that conversation was?</p> <p>13 A. 15 minutes, approximately.</p> <p>14 Q. Okay. And you said that conversation was</p> <p>15 over the phone?</p> <p>16 A. It was via Teams.</p> <p>17 Q. Okay. Have you met with any other</p> <p>18 attorneys in preparation for today's deposition?</p> <p>19 A. I have not.</p> <p>20 Q. Okay. Have you met with anyone who was</p> <p>21 not an attorney to prepare for today's deposition?</p> <p>22 A. I have not.</p> <p>23 Q. Okay. Did you speak with any other</p> <p>24 defense counsel who are not in the Alabama Attorney</p> <p>25 General's Office in preparation of today's</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Do you vote in Republican party primaries</p> <p>2 in Alabama?</p> <p>3 A. Yes, I do.</p> <p>4 Q. Okay. Do you identify as a Republican?</p> <p>5 A. That's an interesting question. While I</p> <p>6 vote in the Republican primary, I would not say</p> <p>7 that I identify as a Republican. I'm not a</p> <p>8 card-carrying member of the Republican party, if</p> <p>9 that makes sense, or I don't belong to any official</p> <p>10 committees or anything like that. So no. I have</p> <p>11 voted for candidates that are Democrats and</p> <p>12 Independents. So no, I would not consider myself a</p> <p>13 Republican.</p> <p>14 Q. Okay. Have you ever donated to</p> <p>15 Republican party candidates?</p> <p>16 A. I have not actually.</p> <p>17 Q. Okay. Do you have any relationships with</p> <p>18 Republican-elected officials?</p> <p>19 A. What would you constitute as a</p> <p>20 relationship?</p> <p>21 Q. Ongoing conversations with any</p> <p>22 Republican-elected officials?</p> <p>23 A. Yes. As a part of my job as an economic</p> <p>24 developer, I interact with all elected officials at</p> <p>25 all levels. And several of them, of course, are at</p>

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<p style="text-align: right;">Page 13</p> <p>1 the national and state level and identify 2 themselves in a Republican and Democrat party 3 affiliation. But a lot of the local elected 4 officials I interact with mainly on a day-to-day 5 basis are not considered in either party. 6 Q. Okay. At the federal level can you 7 identify which elected officials you have a 8 relationship with? 9 A. Yeah. By name or by district? 10 Q. By name. 11 A. Yeah. United States Senator Katie Britt, 12 United States Senator Tommy Tuberville, 13 Congressional Member Jerry Carl, and Congressional 14 Member Barry Moore. 15 Q. Okay. And all of those individuals are 16 Republicans? 17 A. That is correct. 18 Q. Okay. Have you ever lived anywhere in 19 Mobile County? 20 A. I have never lived anywhere in Mobile 21 County. 22 Q. Okay. So you have not lived in the City 23 of Mobile either? 24 A. I have not. Due to my job, I'm required 25 by my board to live in the bounds of Baldwin</p>	<p style="text-align: right;">Page 15</p> <p>1 A. Yes. 2 Q. Okay. Are you a religious man? 3 A. Yes. 4 Q. Do you attend church? 5 A. I do. 6 Q. Do you attend church in Mobile? 7 A. I do not. 8 Q. Okay. Do you attend church in Baldwin 9 County? 10 A. Yes, I do. 11 Q. What's your religious denomination, if 12 you don't mind me asking? 13 A. The church I attend is a 14 Baptist-affiliated church. However, they don't put 15 it on any signage or documentation, so it would be 16 hard to know that it's a Baptist church standing on 17 the street. 18 Q. Okay. Where do you do your grocery 19 shopping? 20 A. Me particularly? At the specific store 21 or location? 22 Q. City. 23 A. Fairhope, Alabama. 24 Q. Okay. Are you familiar with 25 Representative Sam Jones?</p>
<p style="text-align: right;">Page 14</p> <p>1 County. 2 Q. Okay. Have you worked in Mobile, the 3 City of Mobile, before? 4 A. What do you constitute as work? Because 5 my work takes me all over the country and all over 6 the world, and there are lots of times that I am 7 conducting work while in the City and County of 8 Mobile. But I don't have an office that's based 9 with an address in Mobile, if that's the question. 10 Q. I was referring to an office based in 11 Mobile, and it sounds like you have not worked for 12 an employer who has an office based in Mobile; is 13 that correct? 14 A. That's correct. 15 Q. Okay. You are not currently in school; 16 right? 17 A. That is correct. 18 Q. Do you have children? 19 A. I do. 20 Q. And are they in school right now? 21 A. Yes, they are. 22 Q. Do they attend school in Mobile? 23 A. They do not. 24 Q. Okay. Do they attend school in Baldwin 25 County?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes. Former Mayor of Mobile Sam Jones? 2 Yes, I am. 3 Q. Okay. What do you know about him? 4 A. In what context? 5 Q. You said you know Representative Jones as 6 the former mayor. Is there any other information 7 you know about Representative Jones? 8 A. I know that he's currently a State 9 representative now for his district in Mobile. I 10 did have the opportunity to work alongside him on 11 some regional economic development projects when he 12 was the mayor of Mobile and the Baldwin and Mobile 13 legislative delegations get-together and work 14 jointly and regionally together at certain times, 15 and I'm in the room with him at certain functions 16 as it relates to his current role as a State 17 representative on a very regional basis. 18 Q. Okay. Do you know what projects you 19 worked on with Representative Jones? 20 A. I mean several of the big economic 21 development projects like Airbus, Austal-related 22 expansions, ThyssenKrupp. You name it. All the 23 big regional economic building projects that 24 involve both counties, Mobile and Baldwin County, 25 working together for economic development success</p>

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<p style="text-align: right;">Page 17</p> <p>1 during his tenure as mayor. We would end up in a 2 lot of those meetings and the regional 3 collaborations to help, you know, find economic 4 development success jointly. 5 Q. What industries would you associate those 6 projects with? 7 A. Aerospace, maritime, also steel, 8 metallurgical-related projects were some of the 9 main industry types that those projects were 10 related to. 11 Q. Okay. Are you familiar with the Black 12 Belt in Alabama? 13 A. I am. 14 Q. Okay. What is the Black Belt? 15 A. The Black Belt to me is a group of 16 counties in southwest Alabama that are named that 17 for the richness of the soil and what it produces 18 there in those counties. 19 Q. To the best of your understanding, does 20 the Black Belt share ties to the City of Mobile and 21 the City of Prichard? 22 MR. MCKAY: Object to form. 23 Q. You can answer. 24 A. You said to the best of my knowledge? 25 Q. Correct.</p>	<p style="text-align: right;">Page 19</p> <p>1 I sit. But Mobile definitely is where a lot of 2 your major employers are based. You have a nucleus 3 of downtown commerce when that happens. 4 But I would not say -- the port is a main 5 economic driver, but I would not say it's the only 6 economic driver. 7 Q. Correct. You'd agree then that the City 8 of Mobile is the economic hub of southern Alabama 9 in part because of its port; right? 10 A. I would say it's definitely a large 11 economic attribute to our region and to the City of 12 Mobile. 13 Q. Okay. Thank you. 14 You mentioned earlier that you reviewed 15 your declaration in this case? 16 A. I did. 17 Q. Would you be able to identify that 18 declaration if you were shown it? 19 A. Yes. 20 Q. Okay. I'm going to share my screen in a 21 moment. 22 Mr. Lawson, do you see my screen being 23 shared? 24 A. I do. 25 Q. Do you recognize the document on my</p>
<p style="text-align: right;">Page 18</p> <p>1 A. No, I do not see the Black Belt and 2 Mobile and Prichard being linked together. 3 Q. And why is that? 4 A. To me the two are very separate 5 geographically and economically and a lot of 6 reasons why. But any time anyone has ever said the 7 Black Belt as a geographical designation, I would 8 never put Prichard or Mobile in that designation 9 geographically. 10 Q. Okay. Does Baldwin County share any 11 connections with the Black Belt? 12 A. No. 13 Q. Okay. Would you agree that the City of 14 Mobile is the economic hub of south Alabama? 15 A. The City of Mobile? 16 Q. Correct. 17 A. Yes, I would say that. 18 Q. Okay. And you agree then that the City 19 of Mobile is the economic hub of south Alabama in 20 large part because of the port? 21 A. I mean I wouldn't say in large part the 22 port. I think in the early 1900s, yes, because of 23 the port. But I think there are so many other 24 things economically happening in the region, 25 including what's happening in Baldwin County where</p>	<p style="text-align: right;">Page 20</p> <p>1 screen? 2 A. I do. 3 Q. And what is this document? 4 A. This is my declaration. 5 MR. CAMPBELL-HARRIS: Okay. I'm going to 6 mark and publish the Declaration of Lee Lawson as 7 Exhibit 1. 8 (EXHIBIT 1 WAS IDENTIFIED.) 9 Q. Do you see paragraph 3? 10 A. I do. 11 Q. And do you see the sentence that says: 12 "I currently serve as 13 president of BCEDA"? 14 A. Yes, I do. 15 Q. What is BCEDA? 16 A. It's an acronym for the Baldwin County 17 Economic Development Alliance. 18 Q. If I refer to it as BCEDA, will you 19 understand what I'm referring to? 20 A. Yes. 21 Q. Are you still the president of BCEDA 22 today? 23 A. I am. 24 Q. What are your responsibilities as BCEDA's 25 president?</p>

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<p>1 A. So I lead the organization's efforts for 2 all economic development activities for Baldwin 3 County. I manage a team of seven and answer to a 4 15-member, private-sector Board of Directors. 5 Q. What do you mean by "answer to a private- 6 sector Board of Directors"?</p> <p>7 A. The way our organization is structured is 8 there are five Chambers of Commerce in Baldwin 9 County, and each chamber has three private-sector 10 board appointments to a Board of Directors that 11 oversees our organization. And I hire and fire the 12 staff, and the board hires and fires me. So I 13 answer directly to that Board of Directors. 14 Q. Okay. Does BCEDA publish reports? 15 A. We do. 16 Q. And do you review and edit those reports? 17 A. I do alongside my team. 18 Q. Okay. And you approve those reports as 19 well? 20 A. Most of them, yes. 21 Q. Okay. Let's turn to paragraph 4. Please 22 take a moment to read it to yourself, and then let 23 me know when you're done? 24 A. (Document review.) Okay. 25 Q. In the second sentence of paragraph 4 of</p>	<p>1 Q. Okay. Let's turn to paragraph 5. Like 2 with paragraph 4, please take a moment to review 3 it, and then let me know when you're done. 4 A. (Document review.) Okay. 5 Q. The sentence that starts with "Together," 6 you write: 7 "Together these connections 8 allow roughly 60,000 people 9 to commute to work from 10 Baldwin County to Mobile or 11 vice versa on a daily 12 basis." 13 Did I read that correctly? 14 A. You did. 15 Q. How did you determine that roughly 60,000 16 people commute to work between Baldwin County and 17 Mobile? 18 A. We subscribe to a lot of data sources to 19 compile the reports you mentioned earlier that we 20 publish and that we utilize for economic 21 development data for projects. And a couple of 22 those sources put the commuting pattern and 23 commuting data in that number from basically a 24 Mobile to Baldwin trade. So the number of workers 25 that live in Baldwin County and wake up every day</p>
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<p>1 Exhibit 1 you write: 2 "For every major project, 3 the Mobile and Baldwin 4 County economic development 5 teams present together." 6 What do you mean by "major projects" in 7 that sentence? 8 A. So up until about a year and a half, two 9 years ago we had a 3,000-acre industrial megasite. 10 And when we would have large companies come in town 11 to assess that megasite for investment and 12 location, the Mobile Chamber of Commerce and 13 representatives from Mobile would join with our 14 team and joint present the region because of the 15 regional economic impact of those projects. 16 Q. Okay. And what are the economic 17 development teams that you're referring to here 18 exactly? 19 A. Mainly the Mobile Chamber of Commerce and 20 their economic development team, which handles all 21 of the economic development responsibilities for 22 the City and County of Mobile. 23 Q. Okay. And the Baldwin County economic 24 development team as well? 25 A. That's correct.</p>	<p>1 and commute into Mobile for work and the number of 2 Mobilians that wake up in Mobile every day and 3 commute to Baldwin County for work roughly combine 4 that number of about 60,000. 5 Q. Okay. Are you referring to Mobile County 6 in paragraph 5 or Mobile City? 7 A. Mobile County. It's a county-to-county 8 data source. 9 Q. Okay. Do you know what data source you 10 relied on for this assertion? 11 A. Not specifically. But one of the data 12 sources we use is called JobsEQ, and that's a data 13 source that we use for workforce data. 14 Q. Okay. Do you know whether this number 15 has changed since 2023? 16 A. The fact that our County population has 17 changed for the positive, I would say that number 18 has only increased. 19 Q. Let's go to paragraph 7. Like the 20 previous paragraphs, please take a moment to read 21 it to yourself, and then let me know when you're 22 done. 23 A. (Document review.) Okay. 24 Q. Baldwin County has airports; correct? 25 A. Yes, we have airports. None with</p>

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<p style="text-align: right;">Page 25</p> <p>1 commercial service.</p> <p>2 Q. Are you familiar with the Gulf Shores</p> <p>3 International Airport?</p> <p>4 A. Very familiar.</p> <p>5 Q. Okay. And you agree that Baldwin County</p> <p>6 residents use the Gulf Shores International</p> <p>7 Airport?</p> <p>8 A. I would not agree with that statement as</p> <p>9 a general statement. Currently there's no</p> <p>10 commercial service that leaves the Gulf Shores</p> <p>11 Airport. So the only Baldwin County residents that</p> <p>12 use it have private air transportation to utilize</p> <p>13 the Gulf Shores Airport.</p> <p>14 Q. Okay. Gulf Shores International Airport</p> <p>15 is constructing new terminals; correct?</p> <p>16 A. They are in the process of constructing a</p> <p>17 terminal, yes.</p> <p>18 Q. And that expansion will provide for</p> <p>19 commercial flights; correct?</p> <p>20 A. It would provide for the availability of</p> <p>21 commercial flights. There are no scheduled</p> <p>22 commercial flights for that terminal at this</p> <p>23 moment.</p> <p>24 Q. Would you expect more Baldwin County</p> <p>25 residents to travel to the Gulf Shores</p>	<p style="text-align: right;">Page 27</p> <p>1 airport at this point.</p> <p>2 Q. Okay. I'm going to share -- I'm going to</p> <p>3 take this Exhibit 1 down.</p> <p>4 Does BCEDA have a Twitter account?</p> <p>5 A. I think we do, yes. I'm not 100 percent</p> <p>6 certain that that's one of the platforms we use. I</p> <p>7 know we use multiple platforms, but I'm not in</p> <p>8 charge of them, thankfully.</p> <p>9 Q. Are you familiar then with BCEDA's</p> <p>10 Twitter account?</p> <p>11 A. Generally.</p> <p>12 Q. Okay. If you saw a tweet from BCEDA's</p> <p>13 Twitter account, would you be able to identify it</p> <p>14 as a tweet from the account?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. I'm going to share my screen</p> <p>17 again.</p> <p>18 Do you see the image I'm sharing?</p> <p>19 A. Yes.</p> <p>20 Q. And does this look like a tweet from</p> <p>21 BCEDA's Twitter account?</p> <p>22 A. It does.</p> <p>23 MR. CAMPBELL-HARRIS: Okay. I'm going to</p> <p>24 publish this as Exhibit 2, a BCEDA tweet from</p> <p>25 August 7th, 2024.</p>
<p style="text-align: right;">Page 26</p> <p>1 International Airport for air travel after that</p> <p>2 expansion is complete?</p> <p>3 A. No.</p> <p>4 Q. Why not?</p> <p>5 A. Because there's not the availability of</p> <p>6 commercial service at this time.</p> <p>7 Q. Let me rephrase the question.</p> <p>8 Do you expect more Baldwin County</p> <p>9 residents to travel via the Gulf Shores</p> <p>10 International Airport once the expansion of the</p> <p>11 commercial terminal is complete?</p> <p>12 A. No.</p> <p>13 Q. Why not?</p> <p>14 A. Because the terminal -- there's currently</p> <p>15 not a commercial carrier slated to have commercial</p> <p>16 flights out of that terminal at this point.</p> <p>17 Q. Would you expect a commercial carrier to</p> <p>18 provide flights in and out of the Gulf Shores</p> <p>19 International Airport once the expansion is</p> <p>20 complete?</p> <p>21 A. Not as of today. That commitment has not</p> <p>22 been made by any carrier. And honestly, with</p> <p>23 Mobile moving their regional airport to Brookley</p> <p>24 Field, it will probably lessen the opportunity for</p> <p>25 commercial carriers to see Gulf Shores as a viable</p>	<p style="text-align: right;">Page 28</p> <p>1 (EXHIBIT 2 WAS IDENTIFIED.)</p> <p>2 Q. Please take a moment to read the tweet,</p> <p>3 and then let me know when you're done.</p> <p>4 A. Yep, I'm done.</p> <p>5 Q. Okay. So you still don't expect the</p> <p>6 expansion of the terminal to provide commercial</p> <p>7 flights to and from the Gulf Shores International</p> <p>8 Airport?</p> <p>9 MR. MCKAY: Object to form. Asked and</p> <p>10 answered.</p> <p>11 You can answer.</p> <p>12 A. Yeah. Not at this time I don't. I mean</p> <p>13 I'll reference my previous statement. It provides</p> <p>14 the opportunity. There's currently not a carrier</p> <p>15 committed for flights at this time.</p> <p>16 Q. Okay. And there are other airports in</p> <p>17 Baldwin County; correct?</p> <p>18 A. Yes.</p> <p>19 Q. And the tweet says:</p> <p>20 "This innovative expansion</p> <p>21 will provide commercial</p> <p>22 flights for the first</p> <p>23 time to coastal Baldwin</p> <p>24 County ..."</p> <p>25 Right?</p>

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<p style="text-align: right;">Page 29</p> <p>1 A. That is what the tweet reads. 2 Q. Do you agree with the tweet? 3 A. I agree that it will provide the 4 availability and the opportunity for it, but it 5 doesn't provide current commercial service at this 6 time because there's not a commercial carrier 7 contracted for those flights. 8 Q. I'm going to pull this image down. 9 I'm going to reshare Exhibit 1. 10 Do you see Exhibit 1 on your screen 11 again, Mr. Lawson? 12 A. I do. 13 Q. Do you see paragraph 8? 14 A. I do. 15 Q. Please take a moment to read it to 16 yourself, and let me know when you're done. 17 A. (Document review.) Yes, I'm done. 18 Q. Sorry. Did you say something? 19 A. I'm done reading it. 20 Q. Okay. Do you see the term "executive 21 workforce" in the second sentence of paragraph 8? 22 A. Yes. 23 Q. How are you defining "executive 24 workforce"? 25 A. We define that as nonmanufacturing</p>	<p style="text-align: right;">Page 31</p> <p>1 information from Airbus? 2 A. I mean it's been multiple people that 3 have referenced that as a stat line and not a stat 4 line. That's one of those where, hey, here it is 5 written in paper but verbally told to us from 6 various executives at Airbus. 7 Q. Can you name any of those executives? 8 A. The chief executive over there is a guy 9 by the name of Darrell Taylor. 10 Q. Okay. So Darrell Taylor told you that 11 90 percent of the executive workforce and 12 60 percent of the industrial employees for 13 Airbus -- Airbus' manufacturing facility in Mobile 14 live in Baldwin County? 15 A. I can't remember exactly if it was 16 Darrell who said that or someone else within 17 leadership at Airbus. 18 Q. Okay. Let's go to paragraph 9. Again, 19 read it to yourself, and then please let me know 20 when you're done. 21 A. (Document review.) Okay. I'm done 22 reading it. 23 Q. Okay. You say: 24 "Baldwin County is 25 Mobile's primary workforce</p>
<p style="text-align: right;">Page 30</p> <p>1 employees, white collar. 2 Q. Okay. How are you defining then 3 "industrial employees"? 4 A. Specifically for Airbus, those that work 5 on the assembly line. 6 Q. Okay. You say that: 7 "For the Airbus 8 manufacturing facility in 9 Mobile, 90 percent of the 10 executive workforce and 60 11 percent of the industrial 12 employees live in Baldwin 13 County." 14 I'm wondering where you got the numbers 15 from for that sentence. 16 A. It's something that's been verbally told 17 to us by management at Airbus when talking about 18 the distribution of their workforce. 19 Q. Okay. So you got that information from 20 someone who works at Airbus? 21 A. Yes. 22 Q. Did you get that information from 23 anywhere else? 24 A. No, we have not. 25 Q. Do you recall who told you that</p>	<p style="text-align: right;">Page 32</p> <p>1 training partner." 2 My first question is: Are you referring 3 to Mobile as Mobile County here? 4 A. Yes. 5 Q. Okay. And what do you mean by "primary 6 workforce training partner"? 7 A. Back to the stat of 60,000 people travel 8 both ways between both counties, that we train a 9 lot of students and adult workers in our community 10 that end up working in Mobile by virtue of it being 11 our number one workforce destination for the 12 working-age population that wakes up in Baldwin 13 County every day and travels to Mobile for work. 14 Q. Okay. Just for clarity, unless you're 15 saying City of Mobile specifically in your 16 declaration, should I read Mobile as Mobile County 17 in your declaration? 18 A. Yes. 19 Q. Okay. Thank you. 20 In the third sentence you say: 21 "The two counties are also 22 the biggest trading 23 partners in the Gulf." 24 How are you defining "the Gulf" in the 25 third sentence of paragraph 9?</p>

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1 A. I would say the I-10 Gulf Coast corridor.
2 Again, we sit right in the center of that I-10 Gulf
3 Coast corridor.
4 Q. Okay. Are there any other counties that
5 you're referring to when you say "the Gulf"?
6 A. When I say "trading partners," I would
7 say trading partners with Baldwin County, because,
8 again, I-10 runs east and west, and there are
9 multiple counties in multiple states along the I-10
10 corridor, and Mobile is our primary economic and
11 workforce training partner.
12 Q. Okay. So when you say "the Gulf," you
13 are also including counties along the Gulf in
14 Florida and Mississippi; is that correct?
15 A. That's correct.
16 Q. Okay. Would you also include counties in
17 Louisiana?
18 A. Some. I mean really I don't believe our
19 trading partners go that far into Louisiana but a
20 little bit.
21 Q. Okay. You write that:
22 "Tourism is an important
23 component of the Baldwin
24 County economy ..."
25 Correct?

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1 A. Very much so.
2 Q. Tourism is Baldwin County's largest
3 economic driver; right?
4 A. By volume, GDP, and visitor traffic, yes.
5 Q. Okay. Do you agree that Baldwin County
6 welcomes more tourists than any other county in
7 Alabama?
8 A. Yes.
9 Q. And that Baldwin County welcomes more
10 than double the amount of visitors and is the
11 second-most visited county in Alabama?
12 A. That's correct.
13 Q. And that Baldwin County has the most
14 tourism-related employment positions among all
15 Alabama counties?
16 A. I think that's on a percentage basis, but
17 yes.
18 Q. And you've agreed that Baldwin County has
19 the highest percentage of tourism industry
20 employment among all Alabama counties?
21 A. I believe that's correct.
22 Q. Okay. Let me stop sharing my screen for
23 a moment.
24 Okay, Mr. Lawson. Do you see the people
25 having fun on a raft shared on your screen?

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1 A. I do.
2 Q. Okay. Are you familiar with this
3 document?
4 A. I think so. Who is it published by?
5 Q. I believe this is published by the
6 Alabama Tourism Department.
7 A. I'm vaguely familiar with it.
8 Q. Okay. I can scroll down too, if that
9 would be helpful.
10 A. I don't know if that will be helpful or
11 not. I don't know that I've seen it before. Or if
12 I have, I haven't spent much time in it.
13 MR. CAMPBELL-HARRIS: Okay. I'm going to
14 publish this document as Exhibit 3, The 2023
15 Alabama Tourism Economic Report.
16 (EXHIBIT 3 WAS IDENTIFIED.)
17 Q. Let's go to Table 20. Do you see
18 Table 20 on your screen?
19 A. I do.
20 Q. Okay. And do you see that's titled
21 Travel-Related Expenditures by County?
22 A. Yes.
23 Q. And do you see that tourists spent over
24 7.9 billion dollars in Baldwin County on
25 travel-related expenditures?

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1 A. Yes, I do see that number.
2 Q. Okay. Does this figure appear correct to
3 you?
4 A. Yeah. We're not a tourism entity, so we
5 don't deal a lot in the tourism dollars. But it
6 seems correct if it's published in the governor's
7 tourism report.
8 Q. And just for the record, Table 20 appears
9 correct to you?
10 A. Yes. Although I'm not a tourism expert.
11 But yes, I would assume it's correct.
12 Q. No other county experienced anything
13 close to the level of tourism that Baldwin County
14 experienced based on Table 20; correct?
15 A. I don't know. I'm only seeing through
16 Greene County on your screen right now.
17 Q. I can scroll down a little bit so you can
18 have a better idea.
19 A. That's correct. I think the closest
20 county is Jefferson at 2.9, which is roughly --
21 usually the second county behind us in the tourism
22 stand.
23 Q. Do you see at the bottom of page 28 here
24 the line titled State Total?
25 A. Uh-huh (positive response).

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<p>1 Q. And do you see for expenditures under</p> <p>2 2023 the total number of expenditures was roughly</p> <p>3 23 and a half billion dollars?</p> <p>4 A. Correct.</p> <p>5 Q. So you'd agree then that Baldwin County,</p> <p>6 which had 7.9 billion dollars in expenditures,</p> <p>7 accounted for over a third of Alabama's total</p> <p>8 tourism expenditures?</p> <p>9 A. That's correct.</p> <p>10 Q. And again, you have no reason to doubt</p> <p>11 the numbers published in this report by the Alabama</p> <p>12 Tourism Department?</p> <p>13 A. I do not.</p> <p>14 Q. Okay. Are you aware of any industry in</p> <p>15 Baldwin County that is generating more than 7.9</p> <p>16 billion dollars annually?</p> <p>17 A. Not at this time.</p> <p>18 Q. Okay. Why do you think Baldwin County is</p> <p>19 so popular for tourists?</p> <p>20 A. 31 miles of white sandy beaches and the</p> <p>21 first clear water you come to from Texas. So yeah.</p> <p>22 And again, we've built a lot of tourism assets in</p> <p>23 our community to attract visitors in addition to</p> <p>24 our environmental and geographical benefits.</p> <p>25 Q. I hear there's a new Margaritaville</p>	<p>1 "Residents on both sides of</p> <p>2 the Bay watch and read the</p> <p>3 same news."</p> <p>4 Correct?</p> <p>5 A. That is correct.</p> <p>6 Q. How do you know that?</p> <p>7 A. By virtue of the stations and</p> <p>8 publications covering stories on both sides of the</p> <p>9 Bay and representing both geographies when they</p> <p>10 report and state the geography that they cover.</p> <p>11 Q. Okay. Are you familiar with the Baldwin</p> <p>12 Times?</p> <p>13 A. I am familiar with the Baldwin Times.</p> <p>14 Q. And are you familiar with the Gulf Coast</p> <p>15 Media?</p> <p>16 A. I am family with that media group.</p> <p>17 Q. Okay. Would you agree that those two</p> <p>18 media sources focus on Baldwin County stories?</p> <p>19 A. I would agree with that statement.</p> <p>20 Q. Okay. Do you see where you describe --</p> <p>21 is it Lagniappe?</p> <p>22 A. Another reason you need to visit our</p> <p>23 area. It's Lagniappe.</p> <p>24 Q. Lagniappe. Thank you so much.</p> <p>25 You describe Lagniappe as the paper of</p>
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<p>1 coming to Baldwin County; is that correct?</p> <p>2 A. Yes. We'd love to host you sometime.</p> <p>3 Please visit.</p> <p>4 Q. The City of Mobile, it does not have any</p> <p>5 beaches drawing tourists; correct?</p> <p>6 A. Yeah, it does. The City of Mobile or the</p> <p>7 County?</p> <p>8 Q. The City of Mobile specifically.</p> <p>9 A. The City of Mobile does not have a beach</p> <p>10 that I'm aware of.</p> <p>11 Q. There are some sandy beaches in south</p> <p>12 Mobile County, though; correct?</p> <p>13 A. That there are. The mayor of Dauphin</p> <p>14 Island would be very mad at me if I didn't</p> <p>15 acknowledge his beaches.</p> <p>16 Q. I'm going to share my screen again with</p> <p>17 your declaration.</p> <p>18 Do you see it?</p> <p>19 A. I do.</p> <p>20 Q. Okay. Let's go to paragraph 10. And</p> <p>21 like the other paragraphs, please just take a</p> <p>22 moment to review it, and let me know when you're</p> <p>23 done.</p> <p>24 A. (Document review.) I'm done.</p> <p>25 Q. Okay. You say:</p>	<p>1 record for the Mobile/Baldwin region. Why is that?</p> <p>2 A. Because it is currently the only paper</p> <p>3 that's still published physically and distributed</p> <p>4 across both communities and covers stories on both</p> <p>5 sides of the Bay.</p> <p>6 Q. Okay. Did you say it's the only paper</p> <p>7 that covers both sides of the Bay?</p> <p>8 A. That is distributed physically to both</p> <p>9 communities.</p> <p>10 Q. Okay. Let's turn to paragraph 11. Again</p> <p>11 please read it to yourself, and then let me know</p> <p>12 when you're done.</p> <p>13 A. (Document review.) Okay.</p> <p>14 Q. You say:</p> <p>15 "People in Mobile and</p> <p>16 Baldwin Counties cross each</p> <p>17 other's county lines to</p> <p>18 shop."</p> <p>19 Do you know how many people cross the</p> <p>20 county lines to shop?</p> <p>21 A. We have some data sources that show that.</p> <p>22 Again, from a specific determined number, no, I</p> <p>23 would not have a definitive number on that. But we</p> <p>24 do subscribe to a source called Placer.ai where we</p> <p>25 can track retail spending and where retail spenders</p>

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<p>1 originate from. But I do not have a specific 2 number from a county-to-county basis. 3 Q. Okay. So you do not have a specific 4 number of how many people shop between Baldwin and 5 Mobile County? 6 A. I don't. But we subscribe to a data 7 source that does give us reports that does show 8 that that is a trend and that that occurrence does 9 happen.</p>	<p>1 Gras; correct? 2 A. That is correct. 3 Q. Okay. Let's turn to paragraph 14 of your 4 declaration. And like the others, please take a 5 moment to review it, and then let me know when 6 you're done. 7 A. (Document review.) Okay. I'm done. 8 Q. Okay. You write that the Wiregrass is 9 worried about Fort Rucker, peanuts, cotton, and 10 cattle; correct?</p>
<p>10 Q. Okay. Do you know how many people come 11 to the City of Mobile from the Black Belt for their 12 healthcare or shopping needs? 13 A. I'm not familiar with any data related to 14 that.</p>	<p>11 A. That's correct. 12 Q. What are the Wiregrass counties? 13 A. You're going to ask me to name county 14 names, and I'm about to fail Alabama history all 15 over again. Houston, Coffee, Geneva, Dale, I 16 think, and Pike. I would consider those as 17 Wiregrass counties. I'm probably leaving one or 18 two more out.</p>
<p>15 Q. Okay. Let's turn to paragraph 12. 16 Please take another moment to review it, and then 17 let me know when you're done. 18 A. (Document review.) Okay. I'm done.</p>	<p>19 Q. It's not a history test. Don't worry. 20 Do you know whether Baldwin County was in 21 a congressional district with any Wiregrass 22 counties prior to 2021? 23 A. Not to my knowledge, no. 24 Q. Would you agree that Covington is a 25 Wiregrass county?</p>
<p>19 Q. You'd agree that high school students in 20 Baldwin County would also matriculate to colleges 21 in Baldwin County? 22 A. We do not have any four-year colleges 23 based in Baldwin County. 24 Q. But there are community colleges? 25 A. Yes. Coastal Alabama Community College</p>	
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<p>1 does have several locations in Baldwin County. 2 Q. And Baldwin County High School students 3 would graduate and go to those community colleges; 4 correct? 5 A. That is correct. My statement in 6 paragraph 12 was mainly related to four-year 7 universities.</p>	<p>1 A. I don't know that I would agree that 2 Covington is, but I guess it could be considered 3 one. 4 Q. Do you know whether Baldwin County was in 5 a congressional district with any Wiregrass 6 counties from 2021 to 2023? 7 A. I'm guessing we were since you're asking 8 the question. But I'm not certain we were or we 9 weren't. We may have had a touch of them in 10 District 1. I can't remember the exact map.</p>
<p>8 Q. Thank you. 9 Do you know how many Baldwin County High 10 School students go to Mobile for college? 11 A. I do not have that number off the top of 12 my head, but I know Jo Bonner would like it to be 13 more. 14 Q. Okay. Let's turn to paragraph 13 about 15 Mardi Gras. Please take another moment to review 16 it, and then let me know when you're done, please. 17 A. (Document review.) I'm done.</p>	<p>11 Q. Okay. And Baldwin County was in 12 District 1 from 2021 to 2023? 13 A. That's correct. 14 Q. Okay. Do you know whether Baldwin County 15 shares a congressional district with any Wiregrass 16 counties today? 17 A. I would have to look at the map of 18 District 1. I'm not 100 percent familiar with the 19 entire district -- the counties that are in 20 District 1 or what counties District 1 touches.</p>
<p>18 Q. Okay. Baldwin County and the City of 19 Mobile have different Mardi Gras events; correct? 20 A. Yeah. Baldwin County does not, but 21 certain organizations within Baldwin County do. 22 But yes. 23 Q. Okay. Sometimes those events hosted for 24 Mardi Gras in Baldwin County occur at the same time 25 as events hosted in the City of Mobile for Mardi</p>	<p>21 Q. Okay. Have you seen the new 22 Court-Enacted Congressional Map for Alabama since 23 you started participating in this case? 24 A. I have. 25 Q. Okay. Has Baldwin County sharing a</p>

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<p style="text-align: right;">Page 45</p> <p>1 congressional district with any Wiregrass counties</p> <p>2 created any problems for the economic development</p> <p>3 in Baldwin County?</p> <p>4 A. When you say "problems," what are you</p> <p>5 referring to?</p> <p>6 Q. Anything that could be considered a</p> <p>7 problem for economic development in Baldwin County.</p> <p>8 A. I would say definitively a problem, no.</p> <p>9 Looking forward, when you share a geography with</p> <p>10 counties that don't share the same economic</p> <p>11 interests you do, then yes, I think politically and</p> <p>12 representatively that representation gets diluted.</p> <p>13 So yes, on the horizon, I do see a</p> <p>14 problem with sharing a large portion of our</p> <p>15 congressional district with Wiregrass counties</p> <p>16 because that focus and that representation will be</p> <p>17 diluted across other economic and political</p> <p>18 priorities.</p> <p>19 Q. I'm going to stop sharing my screen for a</p> <p>20 moment.</p> <p>21 I'm going to reshare it again.</p> <p>22 Mr. Lawson, do you see the document</p> <p>23 shared on my screen?</p> <p>24 A. I do.</p> <p>25 Q. Okay. Are you familiar with the</p>	<p style="text-align: right;">Page 47</p> <p>1 County as a county in the Wiregrass before?</p> <p>2 A. I did previously, yes.</p> <p>3 Q. Okay. And you said you're familiar with</p> <p>4 Fort Rucker; is that correct?</p> <p>5 A. I guess the base formerly known as Fort</p> <p>6 Rucker, yes.</p> <p>7 Q. And you know that the base formerly known</p> <p>8 as Fort Rucker is home to the U.S. Army Aviation</p> <p>9 Center of Excellence?</p> <p>10 A. I don't know it by that name. But yes,</p> <p>11 I'm familiar with the helicopter aviation presence</p> <p>12 there at Fork Rucker.</p> <p>13 Q. Okay. And you see M1 Support Services</p> <p>14 listed as the largest employer in Coffee County?</p> <p>15 A. That's correct.</p> <p>16 Q. And do you see under Industry it says</p> <p>17 aircraft maintenance?</p> <p>18 A. Yes.</p> <p>19 Q. So you'd agree that the largest employer</p> <p>20 in Coffee County is a company in the aerospace</p> <p>21 industry?</p> <p>22 A. Yes, according to this document.</p> <p>23 Q. Do you have any reason to doubt the</p> <p>24 numbers -- figures in this document?</p> <p>25 A. I do not.</p>
<p style="text-align: right;">Page 46</p> <p>1 Wiregrass Economic Development Council or Alliance?</p> <p>2 A. Not by that name, no.</p> <p>3 Q. I'm going to scroll down through this</p> <p>4 document, so just take a moment to review it. And</p> <p>5 then let me know when you'd like me to flip to the</p> <p>6 next page.</p> <p>7 A. Okay.</p> <p>8 Q. And my apologies, but are you familiar</p> <p>9 with the Wiregrass Economic Development</p> <p>10 Corporation?</p> <p>11 A. I am not.</p> <p>12 Q. Okay. I'm just going to scroll back to</p> <p>13 the top for a moment.</p> <p>14 You mentioned Coffee County is in the</p> <p>15 Wiregrass; correct?</p> <p>16 A. Did I say Coffee County earlier? I think</p> <p>17 I said Dale, Geneva, Pike. I don't remember,</p> <p>18 honestly. I don't know if I said Coffee County or</p> <p>19 not.</p> <p>20 MR. CAMPBELL-HARRIS: Let's go off the</p> <p>21 record for a second.</p> <p>22 (A DISCUSSION WAS HELD OFF THE RECORD.)</p> <p>23 (REQUESTED PORTION OF RECORD READ.)</p> <p>24 BY MR. CAMPBELL-HARRIS:</p> <p>25 Q. So Mr. Lawson, you identified Coffee</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Okay. You'd agree then that both Baldwin</p> <p>2 County and the Wiregrass share needs related to the</p> <p>3 aerospace industry?</p> <p>4 MR. MCKAY: Object to form.</p> <p>5 A. When you say "needs," what do you mean?</p> <p>6 Q. Economic desires and goals.</p> <p>7 A. I don't know about economic desires and</p> <p>8 goals. We have a large aerospace employer as well</p> <p>9 that does a little -- has a little different bent</p> <p>10 to it than the base-support service that happens at</p> <p>11 Fort Rucker.</p> <p>12 Q. Both the Wiregrass and Baldwin County</p> <p>13 share large aerospace industry employers?</p> <p>14 A. That is a correct statement.</p> <p>15 Q. And do you see also that there's a large</p> <p>16 automotive car parts company in Coffee County as</p> <p>17 well?</p> <p>18 A. I do see that on this form.</p> <p>19 Q. Okay. And you see also General Dynamics</p> <p>20 has an office in Coffee County as well for aviation</p> <p>21 simulation?</p> <p>22 A. I do see that on your screen.</p> <p>23 Q. And you see that in the City -- well,</p> <p>24 I'll scroll down.</p> <p>25 And you see that in Geneva County Air</p>

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<p>Page 49</p> <p>1 Performance has a business there?</p> <p>2 A. I do see that.</p> <p>3 Q. And you see that Air Performance is an</p> <p>4 aluminum industry company?</p> <p>5 A. Aluminum louvers?</p> <p>6 Q. Louvers; correct.</p> <p>7 A. I do see that.</p> <p>8 Q. Okay. And you see Outdoor Aluminum is</p> <p>9 also a business in Geneva County?</p> <p>10 A. I do see that.</p> <p>11 Q. And you see Outdoor Aluminum is also an</p> <p>12 aluminum industry-related corporation?</p> <p>13 A. I do see that.</p>	<p>Page 51</p> <p>1 business in Coffee County?</p> <p>2 A. I do.</p> <p>3 Q. And you see that Pilgrim's Pride is a</p> <p>4 poultry corporation, farm?</p> <p>5 A. Poultry producer, yes.</p> <p>6 Q. Okay. Would you agree that poultry</p> <p>7 farmers in Baldwin County do share some</p> <p>8 agricultural interests with farmers in the</p> <p>9 Wiregrass?</p> <p>10 A. I wouldn't be able to answer that</p> <p>11 definitively.</p> <p>12 Q. Okay. I'm going to stop sharing my</p> <p>13 screen.</p>
<p>14 Q. Okay. Would you agree that both Baldwin</p> <p>15 County and the Wiregrass share advanced</p> <p>16 manufacturing needs?</p> <p>17 A. Share advanced manufacturing needs? I</p> <p>18 would say yes. Every county in Alabama has</p> <p>19 advanced manufacturers in their community. But</p> <p>20 yes, we both have advanced manufacturers in our</p> <p>21 community.</p> <p>22 Q. Okay. And you agree that both Baldwin</p> <p>23 County and the Wiregrass share interests in the</p> <p>24 aluminum industry?</p> <p>25 A. We do now.</p>	<p>14 Do you have any other concerns about</p> <p>15 Baldwin County sharing a congressional district</p> <p>16 with the Wiregrass that are not listed in your</p> <p>17 declaration?</p> <p>18 A. Can you share my declaration again?</p> <p>19 Q. I can.</p> <p>20 A. So I can refamiliarize myself with the</p> <p>21 last paragraph.</p> <p>22 Q. Do you see your declaration?</p> <p>23 A. I do. (Document review.)</p> <p>24 None that are not shared in my</p> <p>25 declaration at this time.</p>
<p>Page 50</p> <p>1 Q. Okay. And you're familiar with Novelis?</p> <p>2 A. Novelis, yes.</p> <p>3 Q. Novelis. Thank you.</p> <p>4 What is Novelis?</p> <p>5 A. Novelis is a company headquartered in</p> <p>6 Atlanta, Georgia, that is currently investing</p> <p>7 4 billion dollars in an integrated aluminum mill in</p> <p>8 Baldwin County.</p> <p>9 THE COURT REPORTER: Were you marking</p> <p>10 that Dayton?</p> <p>11 MR. CAMPBELL-HARRIS: Yes. Thank you.</p> <p>12 I'll mark it as Exhibit 4, I believe is the number</p> <p>13 we're on.</p> <p>14 (EXHIBIT 4 WAS IDENTIFIED.)</p> <p>15 Q. Are there chicken farms in Baldwin</p> <p>16 County?</p> <p>17 A. To my knowledge -- from a chicken</p> <p>18 production or egg production?</p> <p>19 Q. Either.</p> <p>20 A. I am familiar with at least one egg</p> <p>21 production facility in Baldwin County.</p> <p>22 Q. Okay. I'm going to share my screen again</p> <p>23 to the document listed as Exhibit 4, the Wiregrass</p> <p>24 Economic Development Corporation major employers</p> <p>25 page. Do you see Pilgrim's Pride listed as a</p>	<p>Page 52</p> <p>1 Q. Besides what's in your declaration, do</p> <p>2 you have any other concerns about Baldwin County</p> <p>3 sharing a congressional district with the</p> <p>4 Wiregrass?</p> <p>5 A. Not opposed to my previous statement and</p> <p>6 what's represented in paragraph 14.</p> <p>7 Q. Okay. Do you have any other concerns</p> <p>8 about Baldwin County as it relates to</p> <p>9 redistricting?</p> <p>10 A. One of our top concerns is that Baldwin</p> <p>11 County is one of Alabama's fastest growing</p> <p>12 counties. And our growth has outpaced any other</p> <p>13 county in South Alabama and largely the state. And</p> <p>14 with our growth, we have concerns that are unique</p> <p>15 to us and therefore feel like our region has grown</p> <p>16 economically together from a Mobile/Baldwin</p> <p>17 perspective. And as I said, it dilutes us from</p> <p>18 being in a wider district that we've now been drawn</p> <p>19 into. So as our growth continues, we'll continue</p> <p>20 more than any other county in the state, tops in</p> <p>21 the state, and we'll continue to have our own</p> <p>22 individualistic needs that are not shared by a lot</p> <p>23 of counties in the new map.</p> <p>24 Q. Okay. I'm going to ask you a pretty</p> <p>25 open-ended question. But how would you describe</p>

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<p style="text-align: right;">Page 53</p> <p>1 the City of Mobile?</p> <p>2 A. I guess in what respect?</p> <p>3 Q. Any respect that comes to mind.</p> <p>4 MR. MCKAY: Object to form.</p> <p>5 A. That's a hard question to answer and sum</p> <p>6 it up into one sentence. But I would describe it</p> <p>7 as a diverse maritime city that has a lot of</p> <p>8 history to it and a lot of culture that is unique</p> <p>9 to its geography and its surrounding geography,</p> <p>10 including its port and its waterfront location and</p> <p>11 its unique location to the Gulf Coast.</p> <p>12 Q. When you say "diverse," what do you mean?</p> <p>13 A. It's diverse from an industry</p> <p>14 perspective, diverse from its heritage and its</p> <p>15 history, how it was founded, and the international</p> <p>16 cultures from which it was founded.</p>	<p style="text-align: right;">Page 55</p> <p>1 for a lot of people. Our net-in migration leads</p> <p>2 the state, so we're attracting a lot of residents</p> <p>3 from outside our region. And then the economic</p> <p>4 opportunities that are here have also been a strong</p> <p>5 piece of our growth.</p> <p>6 MR. CAMPBELL-HARRIS: Okay. We're going</p> <p>7 to unpack that in a little bit, I think. But maybe</p> <p>8 now is a good time to take a break, and then maybe</p> <p>9 let's reconvene at 3:18 -- or I guess 2:18 your</p> <p>10 time.</p> <p>11 MR. MCKAY: Okay. Yes. That sounds</p> <p>12 good. I was going to say I'm not sure we need an</p> <p>13 hour break. Yes, that sounds great.</p> <p>14 MR. CAMPBELL-HARRIS: Perfect. I'll see</p> <p>15 you both in 10 minutes. Thank you so much.</p> <p>16 MR. MCKAY: Thank you.</p> <p>17 (A RECESS WAS TAKEN FROM 2:09 P.M.</p> <p>18 TO 2:21 P.M.)</p> <p>19 BY MR. CAMPBELL-HARRIS:</p>
<p>17 Q. Are there any other similarities between</p> <p>18 the City of Mobile and Baldwin County that we have</p> <p>19 not already discussed today that you can think of?</p> <p>20 A. Not that we have not discussed that I can</p> <p>21 think of.</p> <p>22 Q. Okay. Are there any other differences</p> <p>23 between the City of Mobile and Baldwin County that</p> <p>24 we have not already discussed today that you can</p> <p>25 think of?</p>	<p>20 Q. I have a couple of questions about the</p> <p>21 maps. But before I get into those questions,</p> <p>22 Mr. Lawson, I'm wondering do you have any reason to</p> <p>23 disagree with the fact that there's been intrastate</p> <p>24 migration from the Black Belt into Mobile?</p> <p>25 A. Do I have any reason to disagree with</p>
<p style="text-align: right;">Page 54</p> <p>1 A. Not that I can think of that we've not</p> <p>2 discussed.</p> <p>3 Q. Okay. You mentioned Baldwin County's</p> <p>4 growth. Is Mobile County also one of Alabama's</p> <p>5 fastest growing counties?</p> <p>6 A. It is not.</p> <p>7 Q. Okay. Do you know whether or not Mobile</p> <p>8 County is growing at all?</p> <p>9 A. It has only grown a small amount on a</p> <p>10 percentage basis.</p> <p>11 Q. Okay. But Mobile County is growing?</p> <p>12 A. In the last census data I've seen, it's</p> <p>13 in a very small positive percentage of its</p> <p>14 population.</p> <p>15 Q. What do you attribute the difference in</p> <p>16 growth between the counties to?</p> <p>17 A. I attribute it to multiple factors. But</p> <p>18 again, Baldwin County avails itself to 8 million</p> <p>19 tourists a year, so a lot of people experience our</p> <p>20 county while on vacation. And usually when you're</p> <p>21 on vacation, you have a positive experience. And</p> <p>22 so when you're able to choose a new location to</p> <p>23 move to -- and honestly we've seen the ability of</p> <p>24 people to move for economic opportunities and</p> <p>25 others -- Baldwin County has been a great choice</p>	<p style="text-align: right;">Page 56</p> <p>1 that?</p> <p>2 Q. Correct.</p> <p>3 A. I'm not familiar with the inbound</p> <p>4 migration data for Mobile.</p> <p>5 Q. Okay. So you have no reason to disagree</p> <p>6 that there is regular intrastate migration from the</p> <p>7 Black Belt into Mobile?</p> <p>8 A. I can't agree or disagree. I haven't</p> <p>9 seen the data.</p> <p>10 Q. Okay. You have no reason to disagree</p> <p>11 with whether residents of the Black Belt need</p> <p>12 special healthcare treatment -- or when they need</p> <p>13 special healthcare treatment, they need to travel</p> <p>14 to Mobile or Montgomery?</p> <p>15 A. I'm not familiar with the data, migration</p> <p>16 data, as it relates to healthcare needs in the</p> <p>17 Black Belt.</p> <p>18 Q. Okay. So you have no reason to disagree</p> <p>19 with whether or not Black Belt residents, when they</p> <p>20 need special healthcare treatment, they need to</p> <p>21 travel to Montgomery or Mobile?</p> <p>22 A. I have no reason to agree or disagree.</p> <p>23 Q. And you have no reason to disagree with</p> <p>24 whether or not church pastors from Mobile travel to</p> <p>25 the Black Belt for their congregations?</p>

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<p>1 A. I have no knowledge of that.</p> <p>2 Q. And you have no reason to disagree with</p> <p>3 whether or not folks from the Black Belt come into</p> <p>4 the City of Mobile for Mardi Gras?</p> <p>5 A. I have no reason to know where attendees</p> <p>6 of Mardi Gras are coming from.</p> <p>7 Q. Are you a football fan, Mr. Lawson?</p> <p>8 A. More of a basketball fan, but I do watch</p> <p>9 football from time to time.</p> <p>10 Q. Okay. Are you familiar with the HBCU</p> <p>11 football games in Mobile County?</p> <p>12 A. The Classic that they play or the game</p> <p>13 that they play? I'm vaguely familiar with it, yes.</p> <p>14 Q. Okay. And are you familiar with the</p> <p>15 Senior Bowl?</p> <p>16 A. I am familiar with the Senior Bowl as</p> <p>17 well.</p> <p>18 Q. Okay. Do you have any reason to disagree</p> <p>19 that the HBCU Classic or the Senior Bowl attract</p> <p>20 families from the Black Belt into Mobile County to</p> <p>21 attend and watch those games?</p> <p>22 A. I wouldn't be able to speak from any</p> <p>23 point of expertise on that, no.</p> <p>24 Q. Okay. And you have no reason to disagree</p> <p>25 with whether or not industrial companies in Mobile</p>	<p>1 similarities with Washington County?</p> <p>2 A. We share a border with Washington County</p> <p>3 countywise. I would say northern Baldwin County</p> <p>4 and Washington County have some similarities.</p> <p>5 Q. What are those similarities?</p> <p>6 A. Pine trees and sparse residential</p> <p>7 inhabitation. But mainly geographical in nature.</p> <p>8 Q. Okay. Does Baldwin County share any</p> <p>9 similarities with Washington County that are not</p> <p>10 geographical?</p> <p>11 A. Not to my knowledge.</p> <p>12 Q. Okay. Does Baldwin County share any</p> <p>13 similarities with Monroe County?</p> <p>14 A. One of those similarities is we both have</p> <p>15 locations of Coastal Alabama Community College, now</p> <p>16 that they're a regional community college.</p> <p>17 Q. Okay. Can you name any other</p> <p>18 similarities between Baldwin County and Monroe</p> <p>19 County?</p> <p>20 A. Not to my knowledge.</p> <p>21 Q. You said you review reports that BCEDA</p> <p>22 publishes; correct?</p> <p>23 A. I do.</p> <p>24 Q. Okay. I'm going to share my screen</p> <p>25 again. Do you see the document on my screen?</p>
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<p>1 recruit from the Black Belt?</p> <p>2 A. I wouldn't be able to agree or disagree</p> <p>3 with that.</p> <p>4 Q. Okay. And likewise, you have no reason</p> <p>5 to disagree with whether or not shipbuilding</p> <p>6 companies recruit from the Black Belt?</p> <p>7 A. I wouldn't be able to agree or disagree</p> <p>8 with that.</p> <p>9 Q. You mentioned you've interacted with</p> <p>10 Representative Sam Jones before; correct?</p> <p>11 A. Yes. When he was mayor primarily.</p> <p>12 Q. Okay. And you'd agree he's extremely</p> <p>13 knowledgeable about the City of Mobile?</p> <p>14 A. He'd have to be to be mayor. But yes.</p> <p>15 Q. And you agree that he's extremely</p> <p>16 knowledgeable about industries in the City of</p> <p>17 Mobile?</p> <p>18 A. I would agree with that, yes.</p> <p>19 Q. Okay. And you'd agree he's extremely</p> <p>20 knowledgeable about the culture of the City of</p> <p>21 Mobile?</p> <p>22 A. I can't disagree with that, but I'm not</p> <p>23 sure. Mayor Jones and I never discussed in depth</p> <p>24 the culture of Mobile.</p> <p>25 Q. Does Baldwin County share any</p>	<p>1 A. I do.</p> <p>2 Q. What is this document?</p> <p>3 A. It's a semi-regular report that we put</p> <p>4 out called Baldwin by the Numbers.</p> <p>5 MR. CAMPBELL-HARRIS: Okay. I'm going to</p> <p>6 publish this document as Exhibit 5, I believe we're</p> <p>7 at, titled Baldwin by the Numbers.</p> <p>8 (EXHIBIT 5 WAS IDENTIFIED.)</p> <p>9 Q. How often does BCEDA publish these</p> <p>10 reports?</p> <p>11 A. It's varied over the years. I think we</p> <p>12 used to try to do it every couple of months. I</p> <p>13 think we're on a quarterly basis now. But I'm not</p> <p>14 100 percent sure that we're on a regular timeline.</p> <p>15 But at least a quarterly report, I believe, now.</p> <p>16 Q. Okay. And you've reviewed this report?</p> <p>17 A. Yes.</p> <p>18 Q. And you're familiar with this report?</p> <p>19 A. I'm trying to see what volume this is so</p> <p>20 I can know what the date on it is, but I don't see</p> <p>21 a date stamp on it anywhere. I don't know what</p> <p>22 publication this one was.</p> <p>23 Q. I can scroll through this, if it's</p> <p>24 helpful, and stop if you'd like me to.</p> <p>25 A. I wouldn't know when this one was</p>

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<p style="text-align: right;">Page 61</p> <p>1 published because, again, I don't see the volume</p> <p>2 number on it. But yes, generally I do see all of</p> <p>3 our Baldwin by the Numbers reports.</p> <p>4 Q. Okay. Do you know where the volume</p> <p>5 number would be on this report?</p> <p>6 A. Typically they're on the front page in</p> <p>7 one of the corners. But if you got this from the</p> <p>8 internet, then I think my team may sanitize them</p> <p>9 and put them out there on the internet.</p> <p>10 Q. On page 2 do you see the graph under the</p> <p>11 title Alabama's Largest Counties?</p> <p>12 A. Yes, I do.</p> <p>13 Q. Okay. It shows that from 2012 to 2022</p> <p>14 Baldwin County experienced a 29.6 percent growth</p> <p>15 rate; correct?</p> <p>16 A. That's correct.</p> <p>17 Q. Okay. Mobile does not stay in that same</p> <p>18 growth rate; correct?</p> <p>19 A. That is correct.</p> <p>20 Q. Okay. Let's go to page 3. And do you</p> <p>21 see the graph under the title Business</p> <p>22 Establishments by Alabama Metro?</p> <p>23 A. I do see that graph.</p> <p>24 Q. And you see Daphne-Fairhope-Foley listed</p> <p>25 there?</p>	<p style="text-align: right;">Page 63</p> <p>1 A. I do not.</p> <p>2 Q. Okay. Baldwin County has had by far</p> <p>3 greater GDP growth since 2017 than Mobile County</p> <p>4 has?</p> <p>5 A. On a percentage basis, yes.</p> <p>6 Q. On a percentage basis. Are you aware of</p> <p>7 any black elected officials in Baldwin County?</p> <p>8 A. Yes.</p> <p>9 Q. Who?</p> <p>10 A. I know that there are City Council</p> <p>11 members. I would have to probably have the list in</p> <p>12 front of me. But there are a few African-American</p> <p>13 City Council members in Daphne and in Foley.</p> <p>14 Councilwoman Quaites is in Foley, and I'm trying to</p> <p>15 remember the Councilwoman's name in Daphne. I know</p> <p>16 that there is a council member in Bay Minette, I</p> <p>17 believe, that's African-American.</p> <p>18 Q. I'm going to pull down this document, and</p> <p>19 I'm going to share my screen again.</p> <p>20 Do you see the article I shared on my</p> <p>21 screen?</p> <p>22 A. I do.</p> <p>23 Q. Have you seen this article before?</p> <p>24 A. Is this the Wall Street Journal?</p> <p>25 Q. Correct.</p>
<p style="text-align: right;">Page 62</p> <p>1 A. Yes.</p> <p>2 Q. Those are all cities in Baldwin County;</p> <p>3 correct?</p> <p>4 A. That's how the office of management and</p> <p>5 budget designates Baldwin County's metropolitan</p> <p>6 statistical area.</p> <p>7 Q. Okay. And then you see Mobile listed as</p> <p>8 a metro statistical area as well?</p> <p>9 A. That is correct.</p> <p>10 Q. Okay. And you see the Baldwin cities and</p> <p>11 Mobile are two distinct listed metro regions?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. Let's go to page 8 of your report.</p> <p>14 Do you see the graph titled -- sorry -- page 9 of</p> <p>15 your report, the graph titled Alabama's Top</p> <p>16 Counties for GDP Growth?</p> <p>17 A. Yes, I do see that graph.</p> <p>18 Q. And you see Baldwin County is listed</p> <p>19 first for GDP growth from 2017 to 2022?</p> <p>20 A. I do see that.</p> <p>21 Q. Okay. And that was by a percentage</p> <p>22 basis; correct?</p> <p>23 A. That is correct.</p> <p>24 Q. You don't see Mobile County listed here</p> <p>25 at all; correct?</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Yes. I have seen this article, yes.</p> <p>2 Q. What is this article about?</p> <p>3 A. It is about the affordability for</p> <p>4 retirees in Baldwin County versus retirement</p> <p>5 destinations in Florida.</p> <p>6 Q. Okay. Let's go to page 2 of this</p> <p>7 article. The last sentence of the first full</p> <p>8 paragraph that I'm highlighting, it reads in part:</p> <p>9 "Much of Baldwin County's</p> <p>10 growth comes from older</p> <p>11 Americans priced out of</p> <p>12 south Florida."</p> <p>13 Did I read that correctly?</p> <p>14 A. Yes, you did.</p> <p>15 Q. Does that reflect your understanding, at</p> <p>16 least in part, of migration patterns</p> <p>17 fueling Baldwin County's growth?</p> <p>18 A. Yes, in part. I don't think that's a</p> <p>19 definitive statement of our growth. Because if you</p> <p>20 look at the demography of our growth, a chunk of</p> <p>21 it is in -- I guess this is saying older Americans.</p> <p>22 That's not very specific; right? I'm 43 and</p> <p>23 consider myself an older American every day. But</p> <p>24 it doesn't say the actual demographic bracket,</p> <p>25 which we usually break down by census data.</p>

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<p>1 But yes, a good chunk of our growth is</p> <p>2 in, quote, unquote, "older Americans."</p> <p>3 Q. Would you say a good chunk of Baldwin</p> <p>4 County's growth is from retirees?</p> <p>5 A. I would say a chunk is. I don't know</p> <p>6 about a good chunk because we do have a good chunk</p> <p>7 of growth in the kind of late 20s to 40s</p> <p>8 demographic as well.</p> <p>9 Q. Okay. Let's go to page 4. And the last</p> <p>10 paragraph, please take a moment to just read it to</p> <p>11 yourself, and then let me know when you're done.</p> <p>12 A. (Document review.) Okay.</p> <p>13 Q. Would you agree that Baldwin County's low</p> <p>14 property tax rate for homeowners over 65 attracts</p> <p>15 retirees to live in Baldwin County?</p> <p>16 A. I would agree with that.</p>	<p>1 A. We have seen an increased percentage in</p> <p>2 northern states, midwestern states, western states.</p> <p>3 We've seen a great mix coming from really all over</p> <p>4 the country.</p> <p>5 Q. And what do you think is attracting those</p> <p>6 people to Baldwin County?</p> <p>7 A. I definitely think it's quality of life,</p> <p>8 it's affordability, our housing prices, public</p> <p>9 schools -- which all four of my kids are in public</p> <p>10 schools. And it's all of that, and the economic</p> <p>11 opportunities are here, not just in tourism. We've</p> <p>12 seen our job growth -- even the data released this</p> <p>13 week has shown a very diverse growth in a lot of</p> <p>14 different job sectors. So I think if you bundle</p> <p>15 all that up, it makes Baldwin County a very</p> <p>16 attractive place to locate.</p>
<p>17 Q. Okay. You're a homeowner too,</p> <p>18 Mr. Lawson?</p> <p>19 A. I am a homeowner.</p> <p>20 Q. And you pay property taxes as a</p> <p>21 homeowner?</p> <p>22 A. I do. I'm not exempt from mine for some</p> <p>23 reason. But yes, I do pay mine.</p> <p>24 Q. Would you say that your property taxes</p> <p>25 are also lower relative to other counties along the</p>	<p>17 Q. And you'd agree that the beaches are also</p> <p>18 a part of Baldwin County that is attracting people</p> <p>19 to move to the county?</p> <p>20 A. We say the beaches are why people come</p> <p>21 and a large reason why they stay.</p> <p>22 Q. Can't disagree with that.</p> <p>23 I'm going to take this down.</p> <p>24 THE COURT REPORTER: Marking that?</p> <p>25 MR. CAMPBELL-HARRIS: Yes. As Exhibit 6.</p>
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<p>1 Gulf?</p> <p>2 A. I wouldn't know. I haven't lived in any</p> <p>3 other counties along the Gulf. But as far as</p> <p>4 millage rates are concerned, yes. Along the Gulf,</p> <p>5 if you're talking about Florida, then yes, we do</p> <p>6 have a lower property tax rate than our neighbors</p> <p>7 in Florida.</p> <p>8 Q. Were low property taxes one of the</p> <p>9 reasons why you wanted to live in Baldwin County?</p> <p>10 A. I've lived in Alabama my whole life, so</p> <p>11 I've experienced low property taxes my entire life</p> <p>12 of being a homeowner.</p> <p>13 Q. Okay. And you agree that at least some</p> <p>14 of the people migrating to Baldwin County migrate</p> <p>15 from the Florida Panhandle?</p> <p>16 A. If you look at the data of our</p> <p>17 in-migration, some is from Florida. I would say in</p> <p>18 the most recent three- to five-year report we've</p> <p>19 seen migration from all over the country. Florida</p> <p>20 is a piece of that. But our in-migration is</p> <p>21 definitely diversified from a geographic</p> <p>22 perspective.</p>	<p>1 (EXHIBIT 6 WAS IDENTIFIED.)</p> <p>2 Q. Did you review a congressional map that</p> <p>3 the Alabama legislature passed in July last year?</p> <p>4 A. I have seen it. It has been some time</p> <p>5 since I've last seen it.</p> <p>6 Q. Okay. Do you see the map that I'm</p> <p>7 sharing on my screen?</p> <p>8 A. I do.</p> <p>9 Q. Okay. Is this the map that you reviewed</p> <p>10 last year?</p> <p>11 A. I believe it's one of the maps I saw. I</p> <p>12 think there were many variations of it. But yes,</p> <p>13 I've seen this map and others.</p> <p>14 MR. CAMPBELL-HARRIS: Okay. I'm going to</p> <p>15 publish this exhibit as Exhibit 7, Livingston</p> <p>16 Congressional Plan 3.</p> <p>17 (EXHIBIT 7 WAS IDENTIFIED.)</p> <p>18 Q. So why did you review this map last year?</p> <p>19 A. I mean there are multiple maps out there</p> <p>20 that were being proposed. Again, our congressional</p> <p>21 district that Baldwin County is in is important to</p> <p>22 me as an economic development professional. So I</p> <p>23 saw multiple maps that were proposed that were</p> <p>24 published in different news articles and elsewhere.</p>
<p>23 Q. Would you say that a good chunk of people</p> <p>24 moving to Baldwin County come from northern states,</p> <p>25 states above the Mason-Dixon line?</p>	<p>25 Q. Were you asked to review this map?</p>

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<p style="text-align: right;">Page 69</p> <p>1 A. Not in any professional capacity.</p> <p>2 Q. Okay. Were you asked to review this map</p> <p>3 in a nonprofessional capacity by anyone?</p> <p>4 A. Not asked to review it. I've looked at</p> <p>5 them myself but not asked for any opinion or any</p> <p>6 interpretation of the map.</p> <p>7 Q. Okay. Did you review other maps or</p> <p>8 drafts of Alabama's congressional districts last</p> <p>9 year?</p> <p>10 A. Yeah. When all the conversation was</p> <p>11 going on, I saw multiple maps in multiple</p> <p>12 configurations. But I really can't distinguish one</p> <p>13 from the other. Like the fact that you call this</p> <p>14 Livingston Congressional Plan 3, I've never heard a</p> <p>15 map referred to as that.</p> <p>16 Q. Okay. What are your thoughts about this</p> <p>17 map?</p> <p>18 A. I don't have any real thoughts about it.</p> <p>19 In what context?</p> <p>20 Q. Do you feel like this map provides</p> <p>21 adequate representation of Baldwin County?</p> <p>22 A. Representation of Baldwin County how so?</p> <p>23 Q. Fair representation in Congress.</p> <p>24 A. I couldn't --</p> <p>25 Q. Let me withdraw that question actually.</p>	<p style="text-align: right;">Page 71</p> <p>1 A. I have met Representative Barry Moore,</p> <p>2 yes. I don't know him, but I have met him and</p> <p>3 spent a little bit of time with him.</p> <p>4 Q. How did you end up meeting Representative</p> <p>5 Moore?</p> <p>6 A. He and his team asked for a meeting to</p> <p>7 understand the economic development happenings in</p> <p>8 Baldwin County and asked for a meeting to discuss</p> <p>9 those and have me basically present them with</p> <p>10 what's going on in Baldwin County in economic</p> <p>11 development.</p> <p>12 Q. Okay. Did you have any -- scratch that.</p> <p>13 Have you had any other meetings with</p> <p>14 Representative Moore?</p> <p>15 A. I have not. Just that one meeting.</p> <p>16 Q. Okay. Did you speak with Representative</p> <p>17 Moore about this case?</p> <p>18 A. I have not, no. Our conversation was</p> <p>19 solely around what projects are happening in</p> <p>20 Baldwin County, where our focus for economic</p> <p>21 development is, and basically educating him on all</p> <p>22 that is going on in Baldwin County from an economic</p> <p>23 development standpoint.</p> <p>24 Q. Do you feel like Representative Moore --</p> <p>25 scratch that.</p>
<p style="text-align: right;">Page 70</p> <p>1 It was a poorly worded question.</p> <p>2 Do you feel like the counties listed</p> <p>3 under Congressional District 1 all share economic</p> <p>4 interests?</p> <p>5 A. Probably not all. But I do believe</p> <p>6 Mobile and Baldwin share more -- Mobile, Baldwin,</p> <p>7 and Escambia then I would think Covington does with</p> <p>8 Baldwin and Mobile and Conecuh -- I mean and</p> <p>9 Escambia. Excuse me.</p> <p>10 Q. How long have you lived in Baldwin County</p> <p>11 again?</p> <p>12 A. I've lived in Baldwin County cumulatively</p> <p>13 for around 15 years now.</p> <p>14 Q. And have you been happy with the</p> <p>15 performance of your congressmen during that time?</p> <p>16 A. I have.</p> <p>17 Q. Okay. Why have you been happy with the</p> <p>18 performance of your congressmen during that time?</p> <p>19 A. Well, they've all lived in close</p> <p>20 proximity to me. They've all had an interest in</p> <p>21 economic development. And they've all -- them and</p> <p>22 their staffs have all worked to help grow economic</p> <p>23 development in our area, which is important to me.</p> <p>24 Q. Okay. Do you know Representative Barry</p> <p>25 Moore?</p>	<p style="text-align: right;">Page 72</p> <p>1 Would you be happy if Representative</p> <p>2 Moore were your congressman?</p> <p>3 MR. MCKAY: Object to form.</p> <p>4 A. Happy? Again, his commitment to economic</p> <p>5 development in our one meeting was, I would say, on</p> <p>6 par with previous representatives.</p> <p>7 Q. Do you have any reason to believe that he</p> <p>8 won't be a good representative for Baldwin County</p> <p>9 in Congress?</p> <p>10 A. I do not have any reason to believe that.</p> <p>11 What I do have reason to believe is that he still</p> <p>12 has a lot to learn about Baldwin County and our</p> <p>13 region, not being from here and not representing it</p> <p>14 previously.</p> <p>15 Q. Okay. So you have no reason to think he</p> <p>16 will not be a good representative to Baldwin County</p> <p>17 residents?</p> <p>18 MR. MCKAY: Object to the form.</p> <p>19 A. I do not.</p> <p>20 Q. Okay. I'm going to share my screen</p> <p>21 again. Do you see the map shared on my screen?</p> <p>22 A. I do see this map.</p> <p>23 Q. Have you seen this map before?</p> <p>24 A. I have.</p> <p>25 Q. What is this map?</p>

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<p style="text-align: right;">Page 73</p> <p>1 A. I believe this is the current proposed</p> <p>2 congressional districts related to the ruling.</p> <p>3 MR. CAMPBELL-HARRIS: I'm going to mark</p> <p>4 and publish this exhibit as Exhibit 8, the 2023</p> <p>5 Court-Enacted Congressional Plan for Alabama.</p> <p>6 (EXHIBIT 8 WAS IDENTIFIED.)</p> <p>7 Q. You see that Baldwin County is kept whole</p> <p>8 in this map; correct?</p> <p>9 A. I do see that.</p> <p>10 Q. And you see that Escambia and Covington</p> <p>11 Counties are also included in the same</p> <p>12 congressional district as Baldwin County?</p> <p>13 A. I do see that.</p> <p>14 Q. And you see that Escambia and Covington</p> <p>15 and Baldwin County were also kept whole in the</p> <p>16 Livingston 3 Plan that I just showed you?</p> <p>17 A. I did see that in the previous map.</p> <p>18 Q. Okay. You mentioned that Mobile County</p> <p>19 also has nice beaches; correct?</p> <p>20 A. Mobile County has a beach on Dauphin</p> <p>21 Island that they continually have to replenish.</p> <p>22 But yes.</p> <p>23 Q. And Dauphin Island is in south Mobile</p> <p>24 County; correct?</p> <p>25 A. That is correct.</p>	<p style="text-align: right;">Page 75</p> <p>1 A. Zero.</p> <p>2 MR. CAMPBELL-HARRIS: I'm just going to</p> <p>3 take five minutes, Mr. McKay, and maybe we can</p> <p>4 reconvene at 2:55 your time.</p> <p>5 MR. MCKAY: Okay. That sounds good.</p> <p>6 MR. CAMPBELL-HARRIS: Thank you.</p> <p>7 (A RECESS WAS TAKEN FROM 2:50 P.M.</p> <p>8 TO 2:55 P.M.)</p> <p>9 MR. CAMPBELL-HARRIS: No further</p> <p>10 questions from me, Mr. Lawson. I just want to say</p> <p>11 thank you for giving us your time today. I really</p> <p>12 appreciate it. And I hope you have a great rest of</p> <p>13 your day and a good weekend as well.</p> <p>14 I'll pass you off to the next attorney.</p> <p>15 THE WITNESS: Again, I'll be on the</p> <p>16 record as welcoming you to our community at any</p> <p>17 time.</p> <p>18 MR. CAMPBELL-HARRIS: I'd love to take</p> <p>19 you up on that. Thank you.</p> <p>20 MR. MCKAY: Did you want to clarify --</p> <p>21 THE WITNESS: Yeah. I did want to go</p> <p>22 back on the record and clarify one thing.</p> <p>23 We have seven full-time employees at the</p> <p>24 Alliance. We have three contract employees. So I</p> <p>25 miscounted on the eight full-time.</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. And you see that Dauphin Island is in the</p> <p>2 same congressional district as Baldwin County;</p> <p>3 right?</p> <p>4 A. Poorly represented on this map, but yes.</p> <p>5 Q. My apologies for not providing a better</p> <p>6 picture map.</p> <p>7 Dauphin Island's beach is the only beach</p> <p>8 in Mobile County; correct?</p> <p>9 A. It's the only Gulf-facing beach. I would</p> <p>10 say that. That's probably a better declaration and</p> <p>11 understanding of their beach.</p> <p>12 Q. Okay. Do you know what Baldwin County's</p> <p>13 racial demographics are compared to Mobile's?</p> <p>14 A. Not specifically compared to Mobile's,</p> <p>15 but I'm fairly aware -- I'm certainly aware of</p> <p>16 Baldwin County's demography and the breakdown of</p> <p>17 it.</p> <p>18 Q. I'm going to take down this exhibit.</p> <p>19 You said as BCEDA's president, you're in</p> <p>20 charge of the hiring and firing of staff at BCEDA?</p> <p>21 A. That's correct.</p> <p>22 Q. How many staff members are at BCEDA?</p> <p>23 A. Currently full-time staff members, we</p> <p>24 have eight.</p> <p>25 Q. How many of them are not white?</p>	<p style="text-align: right;">Page 76</p> <p>1 MR. CAMPBELL-HARRIS: Okay. Thank you.</p> <p>2 Ms. Isbell, do we need to go back -- this</p> <p>3 is on the record; correct?</p> <p>4 THE COURT REPORTER: Yes. I'm writing.</p> <p>5 MR. CAMPBELL-HARRIS: Okay.</p> <p>6 MR. MCKAY: And I have no questions.</p> <p>7 MR. CAMPBELL-HARRIS: I don't believe</p> <p>8 counsel for the other plaintiff groups have</p> <p>9 questions either. So I think we can close the</p> <p>10 deposition with that.</p> <p>11 Thank you so much, Mr. Lawson. I really</p> <p>12 appreciate it.</p> <p>13 THE WITNESS: You're welcome.</p> <p>14 MR. MCKAY: Thank you, Dayton.</p> <p>15 MR. CAMPBELL-HARRIS: Thank you,</p> <p>16 Mr. McKay.</p> <p>17 Ms. Isbell, I'm about to email you all of</p> <p>18 the exhibits, so you should receive that in the</p> <p>19 next 15 or so minutes, if that's okay.</p> <p>20 THE COURT REPORTER: That would be great.</p> <p>21 Thank you.</p> <p>22 MR. HARRIS: And we would like an</p> <p>23 electronic copy, and we don't need it expedited.</p> <p>24 THE COURT REPORTER: Okay.</p> <p>25 Do you want a copy?</p>

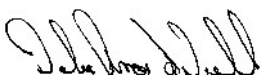
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1 MR. MCKAY: Yes, we would like a copy,
2 regular delivery.
3 THE COURT REPORTER: Do you want a hard
4 copy or just electronic?
5 MR. MCKAY: Electronic.
6 THE COURT REPORTER: Okay.
7 MS. LANCASTER: Electronic copy as well.
8 I can put my email in the chat if that's easiest.
9 THE COURT REPORTER: Okay. I think I can
10 find you, Riley Kate.
11 MS. LANCASTER: Thank you.
12 (THE DEPOSITION OF LEE LAWSON WAS
13 CONCLUDED AT 2:57 P.M. CENTRAL TIME.)
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1 C E R T I F I C A T E
2 I do hereby certify that the foregoing
3 proceedings were taken down by me and transcribed
4 using computer-aided transcription and that the
5 foregoing is a true and correct transcript of said
6 proceedings.
7 I further certify that I am neither of
8 counsel nor of kin to any of the parties, nor am I
9 in anywise interested in the result of said cause.
10 I further certify that I have earned the
11 certifications awarded by the National Court
12 Reporters Association of RPR,RMR,RDR,CRR,CRC,RSA
13 and am duly licensed by the Alabama, Illinois,
14 Louisiana and Mississippi Boards of Court Reporting
15 as a Certified Court Reporter.
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ILLINOIS - CSR #084.004798 (expires 5/31/25)
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