

Page 1

1           IN THE UNITED STATES DISTRICT COURT FOR  
2           THE NORTHERN DISTRICT OF ALABAMA  
3           SOUTHERN DIVISION

4  
5       CASE NUMBER:   2:21-cv-1291-AMM  
6

7       BOBBY SINGLETON, et al.,

8                   Plaintiffs,

9                   vs.

10       WES ALLEN, in his official

11       capacity as Alabama

12       Secretary of State, et al.,

13                   Defendants.  
14

15       CASE NUMBER:   2:21-cv-01530-AMM  
16

17       EVAN MILLIGAN, et al.,

18                   Plaintiffs,

19                   vs.

20       WES ALLEN, in his official

21       capacity as Secretary of

22       State of Alabama, et al.,

23                   Defendants.

Page 2	Page 4
1 CASE NUMBER: 2:21-cv-01536-AMM	1 I N D E X
2	2
3 MARCUS CASTER, et al.,	3 EXAMINATION BY: PAGE NUMBER:
4 Plaintiffs,	4 Mr. Overing 9
5 vs.	5
6 WES ALLEN, in his official	6 DEFENDANT'S EXHIBITS:
7 Capacity as Alabama	7 Exhibit 1 54
8 Secretary of State, et al.,	8 Map
9 Defendants.	9 Exhibit 2 130
10 S T I P U L A T I O N	10 2023 map
11 IT IS STIPULATED AND AGREED, by	11
12 and between the parties through their	12
13 respective counsel, that the deposition of	13
14 BOBBY DUBOSE may be taken before Michelle L.	14
15 Parvin, Commissioner, at the offices of Balch	15
16 & Bingham, 1901 Sixth Avenue North, Suite	16
17 1500, Birmingham, Alabama, 35203, on the 7th	17
18 day of August, 2024.	18
19 IT IS FURTHER STIPULATED AND	19
20 AGREED that it shall not be necessary for any	20
21 objections to be made by counsel to any	21
22 questions, except as to form or leading	22
23 questions, and that counsel for the parties	23
Page 3	Page 5
1 may make objections and assign grounds at the	1 IN THE UNITED STATES DISTRICT COURT FOR
2 time of trial, or at the time said deposition	2 THE NORTHERN DISTRICT OF ALABAMA
3 is offered in evidence, or prior thereto.	3 SOUTHERN DIVISION
4 IT IS FURTHER STIPULATED AND	4
5 AGREED that notice of filing of the	5 CASE NUMBER: 2:21-cv-1291-AMM
6 deposition by the Commissioner is waived.	6
7	7 BOBBY SINGLETON, et al.,
8	8 Plaintiffs,
9	9 vs.
10	10 WES ALLEN, in his official
11	11 capacity as Alabama
12	12 Secretary of State, et al.,
13	13 Defendants.
14	14
15	15 CASE NUMBER: 2:21-cv-01530-AMM
16	16
17	17 EVAN MILLIGAN, et al.,
18	18 Plaintiffs,
19	19 vs.
20	20 WES ALLEN, in his official
21	21 capacity as Secretary of
22	22 State of Alabama, et al.,
23	23 Defendants.

<p style="text-align: right;">Page 6</p> <p>1 CASE NUMBER: 2:21-cv-01536-AMM  2  3 MARCUS CASTER, et al.,  4 Plaintiffs,  5 vs.  6 WES ALLEN, in his official  7 Capacity as Alabama  8 Secretary of State, et al.,  9 Defendants.  10  11 BEFORE:  12 Michelle L. Parvin, Certified  13 Court Reporter  14 APPEARANCES:  15 ELIAS LAW GROUP by Ms. Makeba  16 Rutahindurwa, 250 Massachusetts Avenue NW,  17 Suite 400, Washington, DC, 20001, appearing  18 on behalf of the Plaintiffs.  19 OFFICE OF THE ATTORNEY GENERAL,  20 STATE OF ALABAMA by Mr. Robert M. Overing,  21 Mr. Dylan L. Mauldin, Mr. Richard D. Mink,  22 Ms. Misty S. Fairbanks Messick, 501  23 Washington Avenue, Montgomery, Alabama,</p>	<p style="text-align: right;">Page 8</p> <p>1 I, Michelle L. Parvin, a Court  2 Reporter of Birmingham, Alabama, acting as  3 Commissioner, certify that on this date, as  4 provided by the Federal Rules of Civil  5 Procedure of the United States District  6 Court, and the foregoing stipulation of  7 counsel, there came before me at 1901 Sixth  8 Avenue North, Suite 1500, Birmingham,  9 Alabama, 35203, beginning at 12:21 p.m.,  10 BOBBY DUBOSE, witness in the above cause, for  11 oral examination, whereupon the following  12 proceedings were had:  13  14 BOBBY DUBOSE,  15 being first duly sworn, was examined and  16 testified as follows:  17  18 THE COURT REPORTER: Okay. Usual  19 stipulations?  20 MR. OVERING: Yes.  21 MS. RUTAHINDURWA: Yes, but we'll  22 read and sign.  23</p>
<p style="text-align: right;">Page 7</p> <p>1 36104, appearing on behalf of Defendant  2 Secretary Wes Allen.  3 BALCH &amp; BINGHAM, LLP, by Mr.  4 Michael P. Taunton, 1901 Sixth Avenue North,  5 Suite 1500, Birmingham, Alabama, 35203,  6 appearing on behalf of Defendants  7 Representative Chris Pringle and Senator  8 Steven Livingston.  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23</p>	<p style="text-align: right;">Page 9</p> <p>1 EXAMINATION BY MR. OVERING:  2  3 Q. Good afternoon. My name is  4 Robert Overing, and I represent the Alabama  5 Secretary of State, Wes Allen, in the  6 Congressional redistricting lawsuit you have  7 filed.  8 This deposition is an opportunity  9 for us to understand your testimony in this  10 case. I will be asking you questions, and  11 you will answer under oath.  12 A. Uh-huh.  13 Q. Do you understand?  14 A. I do.  15 Q. There's a court reporter here who  16 will create a transcript of everything that  17 we say. It's important that you answer  18 questions with words rather than shaking your  19 head or saying huh-uh. You need to speak  20 clearly your answers for the court reporter.  21 Will you do that?  22 A. Yes.  23 Q. It's also important for the</p>

<p style="text-align: right;">Page 10</p> <p>1 transcript that we don't talk over each 2 other. If you would wait to answer a 3 question until I've finished asking it, that 4 helps the court reporter and ensures that you 5 hear the question I'm asking. Understood? 6 A. Yes. 7 Q. If you do not understand a 8 question, please let me know, and I will try 9 to ask it again so we can stay on the same 10 page. Will you do that? 11 A. Yes. 12 Q. Sometimes a witness gives an 13 answer and then later realizes that he forgot 14 something or misspoke. If you need to 15 correct any of your testimony during the 16 course of this deposition, please let me or 17 your counsel know. Will you do that? 18 A. Yes. 19 Q. Your counsel may object from time 20 to time, for example, to the form of the 21 question. But unless your counsel tells you 22 not to answer, you should still answer my 23 question. Do you understand?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What was that about? 2 A. The farmers that were being 3 discriminated against. 4 Q. Farmers? 5 A. Farmers, yeah. 6 Q. Are you a farmer? 7 A. Early age, I were. Grew up on a 8 farm, my dad, relative from a little place 9 called Bullock County, Union Springs. 10 Q. And so, you were a member of a 11 class? 12 A. Yeah. On behalf of my father. 13 Q. Oh, okay. 14 A. He's deceased. So, I was an 15 heir. 16 Q. I see. Do you remember what that 17 case was called? 18 A. Pigfoot versus United States, I 19 think, or USDA, something of that nature. 20 Q. What was the case about? 21 A. Loans that were not granted to 22 farmers, and, subsequently, farmers lost 23 their property and their way of life.</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Yes. 2 Q. We can take breaks. If you need 3 to take a break, please let me know. 4 Generally, you should answer any pending 5 question before we take a break. 6 Is there any reason, including 7 medications or any medical condition, that 8 would mean you cannot provide complete and 9 truthful testimony here today? 10 A. No, there isn't. 11 Q. Okay. Do you have any questions 12 before we begin? 13 A. No, sir. 14 Q. Please state your name for the 15 record. 16 A. Bobby Lee DuBose. 17 Q. And before this case, have you 18 been involved in any litigation? 19 A. Pertaining to this case? 20 Q. Before this case. Any other 21 litigation? 22 A. Yes, Black farmers class action 23 settlement, something of that nature.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. And what was the legal theory or 2 why was that unlawful? 3 A. Why was it unlawful? 4 Q. Uh-huh. 5 A. Well, one thing was that farmers 6 who applied for USDA loan were denied, and 7 there was a lawsuit filed because they were 8 denied and they should have not been denied. 9 They was awarded a settlement. 10 Q. Do you remember why they were 11 denied? 12 A. They took it as racial related. 13 Q. I see. So, it was an allegation 14 of racial discrimination in the loan -- 15 A. Exactly. 16 Q. -- process? 17 A. Uh-huh. 18 Q. And did you testify in the case? 19 A. No. No, just filled out an 20 application on behalf of my dad through an 21 attorney. They filed with the class. 22 Q. And when was that? 23 A. Back in 1999.</p>

<p style="text-align: right;">Page 14</p> <p>1 Q. And what was the outcome of the</p> <p>2 case?</p> <p>3 A. It was a fifty-thousand-dollar</p> <p>4 settlement for -- on behalf of my daddy's</p> <p>5 estate.</p> <p>6 Q. Have you been involved in any</p> <p>7 other litigation?</p> <p>8 A. Accident.</p> <p>9 Q. Car accident?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And that was you personally?</p> <p>12 A. Yeah. Family, several.</p> <p>13 Q. Okay. Any other litigation?</p> <p>14 A. I think there was a loan</p> <p>15 application that was filed -- fraudulent loan</p> <p>16 application that was filed with my name. I</p> <p>17 can't think of the name of the company, but</p> <p>18 it was a fraudulent loan. Someone got my</p> <p>19 information. And I had to go through the</p> <p>20 legal process to clear it.</p> <p>21 Q. Do you think there was a lawsuit?</p> <p>22 A. Well, I know my lawyer filed a</p> <p>23 lawsuit, but we didn't go to court. They</p>	<p style="text-align: right;">Page 16</p> <p>1 I filled out paperwork to be a part of this</p> <p>2 particular -- gosh, what is it called --</p> <p>3 Reduction Act. Those farmers that were</p> <p>4 denied loans were entitled to file paperwork</p> <p>5 to seek some benefits from that Reduction Act</p> <p>6 dealing with farmers.</p> <p>7 Q. So, that's different than the</p> <p>8 1999 case?</p> <p>9 A. That's correct.</p> <p>10 Q. So, this one, was it also on</p> <p>11 behalf of your father or --</p> <p>12 A. No, on behalf of myself. I also</p> <p>13 was a farmer.</p> <p>14 Q. And when was that?</p> <p>15 A. I guess about maybe a year ago,</p> <p>16 two years ago.</p> <p>17 Q. How did you get involved in that?</p> <p>18 A. I had heard about it, but I saw</p> <p>19 some advertisement on television. And I</p> <p>20 called for some legal advice. And just</p> <p>21 provided some information.</p> <p>22 Q. And was that a racial</p> <p>23 discrimination issue as well?</p>
<p style="text-align: right;">Page 15</p> <p>1 made an out-of-court settlement, small</p> <p>2 out-of-court settlement.</p> <p>3 Q. Do you remember what that case</p> <p>4 was called?</p> <p>5 A. No, I don't. It's been so long</p> <p>6 ago. I don't remember what's the name of the</p> <p>7 case.</p> <p>8 Q. When was it?</p> <p>9 A. I would just make a guess. Maybe</p> <p>10 2000 and maybe 3 or 4, something like that.</p> <p>11 Years ago. I don't quite remember the exact</p> <p>12 year.</p> <p>13 Q. Was there any part of that that</p> <p>14 had to do with racial discrimination?</p> <p>15 A. No.</p> <p>16 Q. And when was the car accident?</p> <p>17 A. Probably back in '98, something</p> <p>18 like that. I'm not sure. You know, that was</p> <p>19 a long time ago.</p> <p>20 Q. Okay. Since the lawsuit about</p> <p>21 the loan around 2003, have you been involved</p> <p>22 in any lawsuit?</p> <p>23 A. Come to think of it, I hadn't --</p>	<p style="text-align: right;">Page 17</p> <p>1 A. Yes, it was.</p> <p>2 Q. You were discriminated against?</p> <p>3 A. Yes. As a matter of fact, I went</p> <p>4 to get a loan to start the farming business</p> <p>5 back again and was denied.</p> <p>6 Q. That was during the Biden</p> <p>7 administration, right?</p> <p>8 A. When I tried to get the loan?</p> <p>9 Q. Uh-huh.</p> <p>10 A. No, that was way back in --</p> <p>11 probably back -- I was about seventeen -- no,</p> <p>12 I was nineteen. First year of college. I</p> <p>13 went back home, Bullock County, and I applied</p> <p>14 for a loan.</p> <p>15 Q. When you were nineteen?</p> <p>16 A. Uh-huh.</p> <p>17 Q. But this case just came up in the</p> <p>18 last year or two?</p> <p>19 A. Uh-huh. You can go back to so</p> <p>20 many years ago.</p> <p>21 Q. Oh, I see. And what did the</p> <p>22 Inflation Reduction Act have to do with it?</p> <p>23 A. Well, they set aside, from my</p>

<p style="text-align: right;">Page 18</p> <p>1 understanding, a certain amount of money for  2 those farmers who were discriminated against.  3 It's a long history of story that goes with  4 that. And so, what they did, they allowed, I  5 guess, a certain amount of money that was  6 awarded, however the Congressmen do it. And  7 those who fall under that particular category  8 was entitled to some of the money.  9 Q. Could you tell me some of that  10 long history?  11 A. From my understanding, there was  12 a lawsuit filed for a particular race of  13 people, maybe Hispanic, Blacks. But anyway,  14 there was a counter lawsuit that was filed,  15 also. And so, what happened, they started --  16 at this particular time, going under Black  17 farmers, they went under the Reduction Act  18 because there was so many litigation going  19 on, from my understanding.  20 Q. So, you believe when you were  21 nineteen, you were discriminated against when  22 you applied for a farming loan?  23 A. That's correct.</p>	<p style="text-align: right;">Page 20</p> <p>1 court, a lawsuit that you've been a part of?  2 A. No. Those were just -- no.  3 Q. Any arbitration?  4 A. Not that I can think of.  5 Q. Okay. Have you been deposed  6 before today?  7 A. Yes, I have.  8 Q. And which case was that?  9 A. Well, one was that loan that I  10 talked to you about, someone that used my  11 information to obtain a loan for a house. I  12 was deposed in that one.  13 Q. Uh-huh.  14 A. And I think with the car  15 accident, also, I was deposed.  16 Q. Is that it?  17 A. Those all the ones I can remember  18 as of now.  19 Q. Have you ever testified in court?  20 A. Not that I can remember.  21 Q. Have you ever testified under  22 oath in any other setting besides the ones  23 you've described to me?</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. Who discriminated against you?  2 A. Well, there is an agency that was  3 in Bullock County. And I think the guy's  4 last name was Pace. It's been so long ago.  5 We're talking about almost forty years ago.  6 And I came up here and did one year of  7 college and so, I wanted to go back and  8 restart the farm that my dad had lost. And  9 so, I was told there was no money available.  10 Q. But why did you think or why do  11 you think now it was based on race?  12 A. Based on some of the friends of  13 mines back home that were awarded loans. I  14 had the same qualification they had. As a  15 matter of fact, they allowed me to work for  16 them. I can give you names, if you would  17 like, for their names.  18 Q. And they were --  19 A. White farmers.  20 Q. Gotcha. And you're Black?  21 A. Eventually.  22 Q. So, for any of these -- well, is  23 there any other legal matter that got to</p>	<p style="text-align: right;">Page 21</p> <p>1 A. Not that I can remember.  2 Q. Okay. What did you do to prepare  3 for your deposition today?  4 A. Nothing.  5 Q. You didn't talk to anyone?  6 A. I don't know anybody in my area  7 that I could have talked to that know  8 anything about this.  9 Q. You didn't talk to your lawyers?  10 A. We talked about different things.  11 Q. But you didn't prepare for the  12 deposition?  13 A. We talked about small things. We  14 talked about it.  15 MS. RUTAHINDURWA: Just going to  16 remind -- sorry. Let me just say, you can  17 state how many times you've talked to your  18 attorney, but you can't talk about the  19 conversations that we had.  20 A. She and I had a problem  21 communicating -- well, when she called me or  22 text me, I never responded because I always  23 had something going on. And, finally, we had</p>



<p style="text-align: right;">Page 22</p> <p>1 a small conversation yesterday and there were</p> <p>2 other things on the phone. But we never</p> <p>3 could really get together and really discuss</p> <p>4 mostly really nothing at all.</p> <p>5 Q. (BY MR. OVERING) Okay. So, did</p> <p>6 you look at any maps --</p> <p>7 A. No, sir.</p> <p>8 Q. -- before you came here?</p> <p>9 A. No, sir.</p> <p>10 Q. Did you look at any documents?</p> <p>11 A. No.</p> <p>12 Q. Did you bring any documents with</p> <p>13 you?</p> <p>14 A. No. This is an appointment book.</p> <p>15 If you'd like to look through, you're more</p> <p>16 than welcome to.</p> <p>17 Q. No thank you.</p> <p>18 You said you always have</p> <p>19 something going on. What do you do?</p> <p>20 A. I'm retired from Alagasco.</p> <p>21 Q. From where?</p> <p>22 A. Alagasco.</p> <p>23 Q. Uh-huh.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Do you know which congressional</p> <p>2 district you live in?</p> <p>3 A. I think it's 7, Terri Sewell.</p> <p>4 Q. Where did you grow up?</p> <p>5 A. Based on age, from zero to I'd</p> <p>6 say nineteen, Bullock County, and from there,</p> <p>7 Birmingham ever since, school. Upon</p> <p>8 graduation, Birmingham became my permanent</p> <p>9 home.</p> <p>10 Q. You moved to Birmingham when you</p> <p>11 were?</p> <p>12 A. Nineteen. Basically, I went to</p> <p>13 school one year, stopped.</p> <p>14 Q. College?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Which college?</p> <p>17 A. Miles. Miles College.</p> <p>18 Q. So, you graduated from high</p> <p>19 school?</p> <p>20 A. Sir?</p> <p>21 Q. You graduated from high school?</p> <p>22 A. Yes. Yes, sir, I did.</p> <p>23 Q. But you didn't finish a college</p>
<p style="text-align: right;">Page 23</p> <p>1 A. It's Spire now.</p> <p>2 I'm real active in the</p> <p>3 neighborhood. They say when people retire,</p> <p>4 they don't do much, but I beg to differ. I</p> <p>5 have a lot going on dealing with elderly</p> <p>6 people, family members, things that, you</p> <p>7 know -- my neighborhood association, being</p> <p>8 part of president, past president, chairman</p> <p>9 of the board, making sure that people are</p> <p>10 going by the covenant, paying their yearly</p> <p>11 dues, just basic stuff like that that keeps</p> <p>12 you really busy.</p> <p>13 Q. That's an HOA?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And what's your date of birth?</p> <p>16 A. 3/18/63.</p> <p>17 Q. And what is your current address?</p> <p>18 A. 1835 Winnipeg Circle, Bessemer,</p> <p>19 Alabama.</p> <p>20 Q. What's that ZIP Code?</p> <p>21 A. 35022.</p> <p>22 Q. What county?</p> <p>23 A. Jefferson.</p>	<p style="text-align: right;">Page 25</p> <p>1 degree?</p> <p>2 A. I did.</p> <p>3 Q. You did?</p> <p>4 A. Yes.</p> <p>5 Q. In one year?</p> <p>6 A. What year?</p> <p>7 Q. In one year of college?</p> <p>8 A. No, no, no. Came at nineteen,</p> <p>9 told myself to stop. They allowed me to come</p> <p>10 back. And I ended up finishing four years.</p> <p>11 Q. I see. What did you study?</p> <p>12 A. Political science.</p> <p>13 Q. Any other degrees?</p> <p>14 A. No, sir. Just a church degree.</p> <p>15 Vacation -- not vacation -- but we have what</p> <p>16 you call --</p> <p>17 THE COURT REPORTER: Can you move</p> <p>18 your hand away from --</p> <p>19 THE WITNESS: I'm sorry.</p> <p>20 A. -- whatever you call a school at</p> <p>21 church where those of us who want to further</p> <p>22 our education in Christianity, we can take up</p> <p>23 to sixty credit hours and can get a degree.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. (BY MR. OVERING) Okay. Any 2 other education since college? 3 A. No, sir. 4 Q. Okay. And what did you do for 5 Alagasco? 6 A. From where I started to where I 7 ended up? 8 Q. (Counsel nods head.) 9 A. I started general labor. I 10 became an assistant apprentice. And then, I 11 took ill. And so, I left for thirteen and a 12 half months and then came back as a clerk. 13 Q. What does a clerk do? 14 A. They dispatch calls, make sure 15 the files are kept, answer the phone, basic 16 stuff like that, make sure the call goes out 17 to the right person. Any call comes in, make 18 sure that person on that side of town, that 19 call is directed to that person so he can go 20 and see how severe is the gas leak, have 21 someone come over and check it out to make 22 sure there's no danger. 23 Q. When did you retire?</p>	<p style="text-align: right;">Page 28</p> <p>1 A. A little. A little. Not much. 2 I'm just not into -- I'm kind of like the old 3 school, still do things the manual way, not a 4 lot of texting and stuff like that. 5 Q. So, you use social media mostly 6 for family? 7 A. Well, my daughters, yeah, texting 8 or pictures from vacation, stuff like that. 9 Q. Do you ever post about politics? 10 A. No. No. 11 Q. Do you ever post about any of the 12 litigation you're involved in? 13 A. No. That's kind of personal. 14 THE COURT REPORTER: I need you 15 to speak up just a little bit. 16 THE WITNESS: Okay. 17 A. That's kind of personal. I kind 18 of keep those thoughts to myself. 19 Q. (BY MR. OVERING) Is your 20 Facebook account public? 21 A. No. To be honest with you, I'm 22 not even that just, say, into Facebook public 23 or interested in people. I just can't -- I'm</p>
<p style="text-align: right;">Page 27</p> <p>1 A. 2008. 2 Q. Are you a member of -- or were 3 you a member of any professional 4 organizations? 5 A. Professional? I wouldn't think 6 so. 7 Q. Do you have family in Alabama? 8 A. Yes. I have two brothers and two 9 sisters and a whole lot of nieces and 10 nephews. 11 Q. Are your nieces and nephews grown 12 up? 13 A. Yes, sir. You probably know one 14 of them. Sorry about that. 15 Q. Who would -- who would that be? 16 A. Anthony Daniels. 17 Q. Do you use social media? 18 A. Not really. My kids does a 19 little. I'm not one that, you know, like 20 social media. 21 Q. Facebook? 22 A. I'm sorry? 23 Q. Do you use Facebook?</p>	<p style="text-align: right;">Page 29</p> <p>1 just not -- I'm just old school. I'm just 2 basically -- 3 Q. Me, too. 4 So, you haven't posted anywhere 5 online about this case? 6 A. Oh, no, sir. 7 Q. Blog? 8 A. No, sir. No, sir. 9 Q. Okay. What is this case about? 10 A. It's about fair representation 11 with equal voting power, I would say. 12 Q. What does that mean, equal voting 13 power? 14 A. If you've got the majority always 15 make a decision. You've got certain groups 16 that kind of like the minority. And you want 17 to bring an even playing field. You want to 18 be able to dilute the voting so everyone can 19 have a voice, not just the majority. 20 Q. Has there ever been a time in 21 your life that you thought there was an even 22 playing field? 23 A. As far as voting?</p>



<p style="text-align: right;">Page 30</p> <p>1 Q. Uh-huh. Yes.</p> <p>2 A. So, this is a democratic society,</p> <p>3 and the majority rule. Even playing field, I</p> <p>4 don't -- no, I don't think I've never thought</p> <p>5 that way, even playing field, because of your</p> <p>6 belief, my belief, her belief, her belief</p> <p>7 (indicating). It's different beliefs. And</p> <p>8 maybe one day, we can all come together and</p> <p>9 have the same belief and have the same goal</p> <p>10 and the same focus.</p> <p>11 Q. So, part of the reason that there</p> <p>12 isn't an even playing field or equal voting</p> <p>13 power --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- is that people have different</p> <p>16 beliefs and goals?</p> <p>17 A. Well, that's common. You and I</p> <p>18 have different belief and different goals.</p> <p>19 But in voting, you don't want all of the</p> <p>20 thought process or the voting power to go one</p> <p>21 particular way. You want a common -- I say</p> <p>22 even playing field. You want to give equal</p> <p>23 equilibrium where all of us can come to a</p>	<p style="text-align: right;">Page 32</p> <p>1 understanding the need for job opportunity,</p> <p>2 understanding the need that this needs to be</p> <p>3 done, that needs to be done. I think because</p> <p>4 those who are in the majority sometimes</p> <p>5 overlook those in the minority, their needs</p> <p>6 and their understanding.</p> <p>7 Q. Who is in the majority in the</p> <p>8 state government?</p> <p>9 A. The majority is the Caucasian.</p> <p>10 Q. Your representative is Terri</p> <p>11 Sewell, right?</p> <p>12 A. That is correct.</p> <p>13 Q. And if I lived in your district,</p> <p>14 would you and I have equal voting power?</p> <p>15 MS. RUTAHINDURWA: Object to</p> <p>16 form.</p> <p>17 A. Repeat the question.</p> <p>18 Q. (BY MR. OVERING) If I lived in</p> <p>19 your district, would you and I have equal</p> <p>20 voting power?</p> <p>21 MS. RUTAHINDURWA: Same</p> <p>22 objection.</p> <p>23 A. We would.</p>
<p style="text-align: right;">Page 31</p> <p>1 natural understanding that this is right not</p> <p>2 for me but for right for everybody if that</p> <p>3 make any sense.</p> <p>4 Q. And do you think in Alabama</p> <p>5 politics, the thought process tends to go in</p> <p>6 one particular way?</p> <p>7 A. I think those who have a voice</p> <p>8 tends to have it to go their way and those</p> <p>9 who are in the minority who have a smaller</p> <p>10 voice are sometimes often not heard.</p> <p>11 Q. And who's in the majority?</p> <p>12 A. Well, if you -- the majority,</p> <p>13 especially when you're dealing with the House</p> <p>14 of Representative, the Senate in Montgomery,</p> <p>15 most decisions are made based on the</p> <p>16 majority. Regardless of how little</p> <p>17 minorities scream about this, scream about</p> <p>18 that, it's ran by the majority. And the</p> <p>19 majority in Montgomery have different opinion</p> <p>20 than the minority in Montgomery. And the</p> <p>21 minority in Montgomery, it's those</p> <p>22 politicians that come from rural area,</p> <p>23 understanding the need for health insurance,</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. (BY MR. OVERING) If I did not</p> <p>2 support Congresswoman Sewell, would I have a</p> <p>3 voice in your district?</p> <p>4 MS. RUTAHINDURWA: Object to</p> <p>5 form.</p> <p>6 A. If you did not support her, would</p> <p>7 you have a voice?</p> <p>8 Q. (BY MR. OVERING) Uh-huh.</p> <p>9 A. No, because you didn't support</p> <p>10 her in the state where your concerns were.</p> <p>11 Q. How many people in your district</p> <p>12 do you think support Congresswoman Sewell?</p> <p>13 A. It's kind of hard to say. I have</p> <p>14 no idea what the statistic in my district,</p> <p>15 how many in my district. I couldn't really</p> <p>16 say how many support her. I really don't</p> <p>17 know.</p> <p>18 Q. Okay. How did you get involved</p> <p>19 in this lawsuit?</p> <p>20 A. How did I get involved in this</p> <p>21 lawsuit? My nephew and I was talking. And</p> <p>22 I've been a part of the political -- I ain't</p> <p>23 going to say part of political, but I've</p>

<p style="text-align: right;">Page 34</p> <p>1 watched politics even back in the day with  2 Joe Biden, Clarence Thomas. I've always had  3 kind of like an open mind what was going on  4 around me.</p> <p>5 And so -- Artur Davis, I think,  6 was before Terri Sewell. So, I took a notion  7 to understand that there are some things that  8 are important to me, but I also looked at the  9 workload that she was carrying. What I mean  10 by workload, it seemed like there was such a  11 big district of African American grouped in  12 one particular area. And so, I began to  13 voice my opinion thinking that this need to  14 be kind of diluted. What I mean by diluted,  15 it needs to be kind of like chopped up.</p> <p>16 Q. What needs to be chopped up?  17 A. The one particular area that  18 Terri Sewell -- the area Terri Sewell support  19 are predominantly Black. And that's needing  20 more representation.  21 Q. What do you mean more  22 representation?  23 A. She's representing quite a</p>	<p style="text-align: right;">Page 36</p> <p>1 African-American people needs, health  2 insurance, job opportunity.</p> <p>3 I'm from Bullock County. And  4 when you look at health insurance, there's  5 not a functional hospital. When we look at  6 as far as being distributed, my question is,  7 where are they being distributed to. I don't  8 see no change. I'm not there anymore.</p> <p>9 You look at Russell County, you  10 look at those counties that are around, Macon  11 County. I grew up in those counties, Black  12 Belt, farming, all my life. There's not much  13 that's changed since my last -- there's a few  14 things, not much. There's nothing to brag  15 about. There's nothing to go home and tell  16 about. There's little or no change at all.</p> <p>17 Q. Why is it important to have  18 another Black member of Congress to address  19 those problems?  20 A. Because I feel that being African  21 American, coming up through -- my nephew did  22 run for that particular position. There's so  23 many things that Russell, Bullock, Macon are</p>
<p style="text-align: right;">Page 35</p> <p>1 sizable area. And if you look at it, I would  2 say anywhere from eighty-five, ninety  3 percent, just my own personal opinion, are  4 Black. And so, what we want to do, we want  5 to -- we want to do it where we have more  6 representation because that's a lot for her  7 to try to do for African-American people.</p> <p>8 Q. So, how will this lawsuit produce  9 more representation?  10 A. It will open up a whole other  11 avenue. That's what it will do. It will  12 give the entire -- like I say, it's such a  13 large area. And so, this lawsuit that --  14 will help those who feel like their voices  15 have not been heard. As I said, I think it's  16 so much that she has to be confined with,  17 it's just not enough Terri Sewell to handle  18 the entire representation, I think. I think  19 it's more than what she can handle.</p> <p>20 Q. You think there should be another  21 representative like Terri Sewell in Congress?  22 A. There should be another African  23 American that understands the</p>	<p style="text-align: right;">Page 37</p> <p>1 in need of.</p> <p>2 We farmed all our life. That's  3 all we had to do was farm. Education was not  4 important. If you go down there, you'll see  5 there's little or no change at all. Someone  6 needs to have a voice. Someone needs to  7 speak up on behalf of those counties that are  8 underserved, underprivileged. Education  9 system is basically ruined, not much.  10 Schools are closing.</p> <p>11 I left because of what, a better  12 opportunity. You have to leave your home to  13 find a better opportunity. I didn't want to  14 leave home. Don't get me wrong. My mom told  15 me -- she said -- she gave me parting words.  16 She said, things will be better for you.  17 Second grade education.</p> <p>18 Q. Are there white farmers in those  19 counties?  20 A. Sure.  21 Q. Do you think they have  22 representation in Congress?  23 A. I would say so. They have</p>

<p style="text-align: right;">Page 38</p> <p>1 connections.</p> <p>2 Q. What do you mean?</p> <p>3 A. Connections mean that if you and</p> <p>4 I go to the bank and try to get a loan, I</p> <p>5 could see the end results of my -- our farm</p> <p>6 being deteriorated. I can see the end</p> <p>7 results of their farm thriving.</p> <p>8 Case in point, I went down to a</p> <p>9 classmate of mine's daddy funeral. I saw so</p> <p>10 many new tractors and landscaping and things</p> <p>11 I've never seen before. I take it where it</p> <p>12 comes from, it was the lawsuit that was</p> <p>13 filed, the money that was given. That's my</p> <p>14 take of it. But I've heard things, but am I</p> <p>15 sure about it, no. But I've heard things how</p> <p>16 it all came about.</p> <p>17 Q. You don't know for sure?</p> <p>18 A. I don't know for sure, but I've</p> <p>19 heard some things.</p> <p>20 Q. It could have been due to race?</p> <p>21 A. They won the federal lawsuit.</p> <p>22 And what I mean by they won the federal</p> <p>23 lawsuit, whatever fund was available, they</p>	<p style="text-align: right;">Page 40</p> <p>1 Act. There was -- there was -- this lawsuit</p> <p>2 was about to be filed, but because of all the</p> <p>3 paperwork and all the litigation, they had to</p> <p>4 come under the Reduction Act.</p> <p>5 Q. Why didn't President Obama do</p> <p>6 more to speed up the loan process for Black</p> <p>7 farmers?</p> <p>8 MS. RUTAHINDURWA: Object to</p> <p>9 form.</p> <p>10 A. You can say a lot that you'll do</p> <p>11 for you to get into office. But once you get</p> <p>12 in office, I'm sure you know, things change.</p> <p>13 Q. (BY MR. OVERING) Do you know any</p> <p>14 of the other plaintiffs in this lawsuit?</p> <p>15 A. No, sir.</p> <p>16 Q. Do you know Marcus Caster?</p> <p>17 A. No, sir.</p> <p>18 Q. LaKeisha Chestnut?</p> <p>19 A. No, sir. I've heard of some</p> <p>20 Chestnuts down in the Black Belt, but I don't</p> <p>21 know them personally.</p> <p>22 Q. What is the Black Belt?</p> <p>23 A. It's a group of county consists</p>
<p style="text-align: right;">Page 39</p> <p>1 didn't have to wait five, ten, fifteen,</p> <p>2 twenty years. That was all -- that happened</p> <p>3 right away once the lawsuit was filed because</p> <p>4 they felt that they were being discriminated</p> <p>5 against. They were awarded money shortly.</p> <p>6 Q. Black farmers had to wait longer</p> <p>7 for loans than white farmers in those areas?</p> <p>8 A. Most certainly, or denied</p> <p>9 altogether. By the time -- if they were</p> <p>10 approved, the planting season was over with.</p> <p>11 How would you like to wake up one morning and</p> <p>12 everything that you had, worked for all your</p> <p>13 life is gone? That's what happened to my</p> <p>14 parents.</p> <p>15 Q. Did the change in presidential</p> <p>16 administrations have any effect on the</p> <p>17 availability of loans for Black farmers?</p> <p>18 A. Now, I don't know. Back then, I</p> <p>19 could say so. I don't know about now. I</p> <p>20 don't know with the Biden administration. I</p> <p>21 know what the Biden administration done. The</p> <p>22 Trump administration, there was a bump in the</p> <p>23 road from my understanding, the Reduction</p>	<p style="text-align: right;">Page 41</p> <p>1 of maybe twelve. I'm not sure. Those are</p> <p>2 people that consider -- you can look at them</p> <p>3 as low income, disadvantaged, poor education.</p> <p>4 There's a lot of things that goes under the</p> <p>5 name Black Belt. When you hear the name</p> <p>6 Black Belt, you don't all of a sudden think</p> <p>7 of it being a thriving community or thriving</p> <p>8 county. That's why they got the name Black</p> <p>9 Belt, because I feel that it was some form of</p> <p>10 economic disadvantage. That's just my own</p> <p>11 personal opinion.</p> <p>12 Q. Are there people who are low</p> <p>13 income and poorly educated in Alabama outside</p> <p>14 of the Black Belt?</p> <p>15 A. Sure. But the Black Belt is</p> <p>16 known based on that name for that particular</p> <p>17 reason, poor, uneducated, just disadvantaged</p> <p>18 I would say.</p> <p>19 Q. Have you heard the term</p> <p>20 "community of interest"?</p> <p>21 A. I'm sorry? Say again.</p> <p>22 Q. Have you heard the term</p> <p>23 "community of interest"?</p>

<p style="text-align: right;">Page 42</p> <p>1 A. No, I don't think I have. Is 2 that your term -- what's your definition of 3 that? Just -- 4 Q. Different definitions. 5 Do you know Benjamin Jones? 6 A. No. 7 Q. Do you know Rodney Love? 8 A. No. 9 Q. Manasseh Powell? 10 A. No. 11 Q. Ronald Smith? 12 A. No. 13 Q. Wendell Thomas? 14 A. No. 15 Q. Did you recruit any of the other 16 plaintiffs to join this lawsuit? 17 A. No. I never have even met or 18 seen any other plaintiff. 19 Q. Did you recruit any other 20 plaintiffs for the other redistricting cases? 21 A. No, sir. 22 Q. Okay. Have you ever seen a 23 complaint filed in this case?</p>	<p style="text-align: right;">Page 44</p> <p>1 might have glanced at, have you seen any 2 document filed with the court in this case? 3 A. No, I haven't. 4 Q. And you didn't give any earlier 5 testimony in this case, did you? 6 A. Back in 2019, I think, the first 7 time the -- repeat the question again. I'm 8 sorry. Repeat the question. 9 Q. Did you give any testimony in 10 this case? 11 A. I did a deposition back then. 12 That's all I remember. 13 Q. In this case? 14 A. 2018, there was some -- but, no, 15 not in this case, no. 16 Q. Was that the Chestnut case? 17 A. I think so. The very first one. 18 Q. That was a deposition? 19 A. Yeah, I think I came up and there 20 was some lawyers from Washington that was 21 asking me different questions and stuff. 22 Q. Did you ever write a declaration 23 or an affidavit?</p>
<p style="text-align: right;">Page 43</p> <p>1 A. No, sir. 2 Q. Did you ever see the original 3 complaint filed in November of 2021? 4 A. I'm thinking. I just remember 5 sort of the one. Let me see. I think she 6 shared some information with me about the 7 complaint (indicating). I'm sorry. 8 Q. Did you ever read it? 9 A. I glanced over it. Like I say, 10 my schedule being so in and out, out and in. 11 Q. Was that glancing over before or 12 after the complaint was filed? 13 A. After the complaint was filed. 14 Q. Have you ever seen or read any of 15 the expert reports in this case? 16 A. No, sir. 17 Q. Have you ever seen or read any of 18 the court opinions in this case? 19 A. No, sir. 20 Q. Have you ever seen any of the 21 maps involved in this case? 22 A. No. 23 Q. Other than the complaint you</p>	<p style="text-align: right;">Page 45</p> <p>1 A. No, sir. 2 Q. What do you want the court to do 3 in this lawsuit? 4 A. I want the court to look at all 5 different angles. And once they look at all 6 different angles, I want them to understand 7 the complaint, the change that needs to be 8 made that the lawsuit is being brought to, I 9 would say, again, make it an even playing 10 field. 11 Q. What makes it an uneven playing 12 field? 13 A. That's underrepresentation. And 14 if you don't have enough representation, the 15 voices that are speaking up are not being 16 heard. 17 Q. They're not being heard in your 18 district? 19 A. That's the district I'm concerned 20 about. I would say so. The things that 21 Terri Sewell -- this district is so large 22 that some of us voices are not heard where it 23 should be.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q. Could you give an example?</p> <p>2 A. I think healthcare is one of</p> <p>3 them. Not only that, Medicaid for all. This</p> <p>4 is not going anywhere. If I -- I feel that</p> <p>5 if something that'll help the majority of the</p> <p>6 people, why not. It's the poor</p> <p>7 disenfranchised that are the ones hurting.</p> <p>8 See, you can afford the best insurance. But</p> <p>9 there are those who can't afford the best</p> <p>10 insurance. Someone needs to speak on their</p> <p>11 behalf. They may not bother me or you.</p> <p>12 But I can recall my mom being</p> <p>13 sick. Guess what I had to do? I had to</p> <p>14 bring her from down there. Guess what the</p> <p>15 doctor told her? There's nothing we can do</p> <p>16 for her. They sent her home to me. I had to</p> <p>17 bring her from Bullock County. And I had to</p> <p>18 lie for UAB to take her in with Stage 4</p> <p>19 cancer.</p> <p>20 Q. I'm sorry.</p> <p>21 A. Nothing could be done. But I did</p> <p>22 everything I could do.</p> <p>23 Your mom still alive, right?</p>	<p style="text-align: right;">Page 48</p> <p>1 lot of those down there that don't have</p> <p>2 employment do not have health insurance.</p> <p>3 Q. Are you talking about people in</p> <p>4 your district?</p> <p>5 A. People in the Black Belt. People</p> <p>6 who live there needs representation, someone</p> <p>7 who understands. And then, I remember --</p> <p>8 Q. But are those problems in your</p> <p>9 district, too, about health insurance,</p> <p>10 healthcare?</p> <p>11 A. I'm sure there are. But I know</p> <p>12 based on Bullock County where I'm from and</p> <p>13 other counties around there. I've seen so</p> <p>14 much hurt and pain and no health insurance.</p> <p>15 I've seen little concern or no concern at</p> <p>16 all. And I feel that there needs to be a</p> <p>17 voice.</p> <p>18 Q. Does Congresswoman Sewell address</p> <p>19 some of those concerns in Congress with her</p> <p>20 work in Congress?</p> <p>21 A. She'll address that. She'll</p> <p>22 bring grants. She'll provide economic</p> <p>23 opportunity in this district. But other</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Yes.</p> <p>2 A. Your mom goes, it's like the</p> <p>3 closer thing to your faith in God that no one</p> <p>4 will ever tell you, son, I don't care what</p> <p>5 you do, I still love you. My mom has a</p> <p>6 special love. And I don't have that love</p> <p>7 anymore.</p> <p>8 Just basic checkup could have</p> <p>9 saved her life. She did not have any</p> <p>10 insurance, did not have any financial ability</p> <p>11 to get insurance. No one speak on those</p> <p>12 behalf.</p> <p>13 Q. Why not?</p> <p>14 A. That's a good question. Why not?</p> <p>15 They don't care, you think?</p> <p>16 I'm from there and I see the</p> <p>17 struggle, the hurt, and pain. There's no</p> <p>18 money available. If you look at some of</p> <p>19 those counties, man, the mortality rate is so</p> <p>20 high. Someone needs to speak about it.</p> <p>21 Someone needs to take a voice saying we need</p> <p>22 Medicare for all, something that would</p> <p>23 benefit all, not just some. And I think a</p>	<p style="text-align: right;">Page 49</p> <p>1 districts in the Black Belt are hurting,</p> <p>2 also. She can only do so much.</p> <p>3 Q. Well, you said, for example,</p> <p>4 Medicaid for all. Does she support that?</p> <p>5 A. I think I've heard her say it. I</p> <p>6 know Bernie -- that's one of Bernie Sanders'</p> <p>7 things that he always talk about. But I know</p> <p>8 each time it comes before Congress, or each</p> <p>9 time it comes before the state house down in</p> <p>10 Montgomery, it's a no-brainer. It does not</p> <p>11 go anywhere.</p> <p>12 Q. Why doesn't it go anywhere?</p> <p>13 A. Because I feel that those in</p> <p>14 power does not have enough concern and love</p> <p>15 for those who are less fortunate. That's my</p> <p>16 own personal opinion.</p> <p>17 Q. What is congressional</p> <p>18 redistricting?</p> <p>19 A. Congressional redistricting --</p> <p>20 congressional redistricting is where you have</p> <p>21 those who are underserved that does not have</p> <p>22 a voice. By redistricting, they will have a</p> <p>23 voice.</p>



<p style="text-align: right;">Page 50</p> <p>1 Q. When does redistricting happen?</p> <p>2 A. I think, is it every ten years?</p> <p>3 I'm not sure. I'm not sure. That's just a</p> <p>4 guess.</p> <p>5 Q. When did you start paying</p> <p>6 attention to redistricting?</p> <p>7 A. Back when Terri Sewell began to</p> <p>8 take a look at the position, I realized there</p> <p>9 was so much that needed to be done. And I'm</p> <p>10 listening to things that comes from the White</p> <p>11 House, things that come from the Congress,</p> <p>12 things that come from the state, just things</p> <p>13 that comes out and you know that there's not</p> <p>14 much change that are going on and you see the</p> <p>15 people struggling, suffering, and you see no</p> <p>16 one seems to care. And so, there needs to be</p> <p>17 a change.</p> <p>18 Q. What kind of change?</p> <p>19 A. For those people who are</p> <p>20 struggling, for those who do not have health</p> <p>21 insurance, who do not have adequate</p> <p>22 employment, someone needs to be a voice for</p> <p>23 them.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. I think the ideas and the</p> <p>2 situation that's going around those</p> <p>3 particular counties needs to be addressed.</p> <p>4 If he's not doing his job, I don't care what</p> <p>5 color he is, those are -- those concerns need</p> <p>6 to be addressed.</p> <p>7 Q. It doesn't matter whether the</p> <p>8 representative is Black or white?</p> <p>9 A. Well, I think, to me, that it --</p> <p>10 African Americans understand, truly the ones</p> <p>11 who've been there, who grew up there,</p> <p>12 understand the significance of trying to</p> <p>13 bring some improvement more so than someone</p> <p>14 who's not from that particular area.</p> <p>15 Q. How in redistricting could</p> <p>16 Alabama draw the maps to better give those</p> <p>17 people a voice?</p> <p>18 MS. RUTAHINDURWA: Object to the</p> <p>19 form.</p> <p>20 A. Redistricting would allow those</p> <p>21 who haven't had a voice for so long to have a</p> <p>22 voice. That's why redistricting is so</p> <p>23 important. The same old year in and year</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. How is this lawsuit going to --</p> <p>2 A. It will give them representation.</p> <p>3 It will have someone speak on their behalf.</p> <p>4 Q. Well, don't they have a</p> <p>5 representative now?</p> <p>6 MS. RUTAHINDURWA: Object to</p> <p>7 form.</p> <p>8 A. They may, but, apparently, it's</p> <p>9 not working, because the same situation is</p> <p>10 still lingering around now.</p> <p>11 Q. (BY MR. OVERING) People in</p> <p>12 Russell County have a representative in</p> <p>13 Congress, right?</p> <p>14 A. I would -- Russell County,</p> <p>15 Bullock -- Russell County, Macon County,</p> <p>16 Barbour County, whoever their representative</p> <p>17 is, there are some things that are missing.</p> <p>18 Somebody's not --</p> <p>19 Q. You don't know who it is, though?</p> <p>20 A. I have no idea. But I would love</p> <p>21 to have a conversation with them.</p> <p>22 Q. You think that person should be</p> <p>23 replaced?</p>	<p style="text-align: right;">Page 53</p> <p>1 out, the same thing happen, status quo, going</p> <p>2 on in the government. That doesn't work when</p> <p>3 you're redistricting. You want to be able to</p> <p>4 hear the voices of those who have -- who are</p> <p>5 talking but have never been heard.</p> <p>6 Q. What factors do you think the</p> <p>7 state should consider when drawing the</p> <p>8 congressional maps?</p> <p>9 MS. RUTAHINDURWA: Object to</p> <p>10 form.</p> <p>11 A. Repeat the question.</p> <p>12 Q. (BY MR. OVERING) What factors do</p> <p>13 you think the state should consider when</p> <p>14 drawing congressional maps?</p> <p>15 MS. RUTAHINDURWA: Same</p> <p>16 objection.</p> <p>17 A. What factor? You look at</p> <p>18 opportunity, education, employment.</p> <p>19 Opportunity -- education plays some major</p> <p>20 role. Employment plays a major role. Maybe</p> <p>21 I would have been still there if those</p> <p>22 opportunities were granted to me.</p> <p>23 Q. (BY MR. OVERING) Maybe it will</p>



<p style="text-align: right;">Page 54</p> <p>1 help to look at one of the maps.</p> <p>2 A. Yes, sir.</p> <p>3 Q. So, we'll call this Exhibit 1.</p> <p>4</p> <p>5 (Whereupon, Defendant's Exhibit 1</p> <p>6 was marked for identification and</p> <p>7 copy of same is attached hereto.)</p> <p>8</p> <p>9 Q. (BY MR. OVERING) Do you</p> <p>10 recognize that map?</p> <p>11 A. I've got to look at it now. Do I</p> <p>12 recognize this map of -- I mean, it's just</p> <p>13 county broken down in Alabama.</p> <p>14 Q. This is the 2021 map --</p> <p>15 A. Uh-huh.</p> <p>16 Q. -- that this lawsuit is</p> <p>17 challenging.</p> <p>18 A. Uh-huh.</p> <p>19 Q. Or it was challenging.</p> <p>20 What do you think of this map?</p> <p>21 A. I see a map with --</p> <p>22 THE COURT REPORTER: I can't hear</p> <p>23 you. You're going to have to speak up.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. I know it's -- that there's some</p> <p>2 counties that are -- that are grouped</p> <p>3 together much larger than other counties.</p> <p>4 Q. (BY MR. OVERING) What do you</p> <p>5 mean?</p> <p>6 A. You may have -- let me see. I</p> <p>7 think it says blue -- you've got how many?</p> <p>8 One, two, three, four, five. This is all</p> <p>9 based on population?</p> <p>10 Q. Generally.</p> <p>11 A. If you look at the green color,</p> <p>12 those are all predominantly mostly African</p> <p>13 American. Do you agree?</p> <p>14 Q. Which district?</p> <p>15 A. I would say -- I believe it's got</p> <p>16 to be the green colored, Pike, Crenshaw, the</p> <p>17 Butler, the Elmore, Autauga, Covington,</p> <p>18 Geneva. And you also got District 7. Those</p> <p>19 are all counties that are grouped together.</p> <p>20 Q. Where do you live on this map?</p> <p>21 A. Today? What I live in now,</p> <p>22 right? It would be Jefferson County.</p> <p>23 Q. But do you know whether you are</p>
<p style="text-align: right;">Page 55</p> <p>1 A. I see a map with different</p> <p>2 colors. I need to fully understand what the</p> <p>3 different colors is. I see you've got maybe</p> <p>4 1 is -- 2, 3, 4, 5, all the way to 7. So,</p> <p>5 you've got a different color. And this map,</p> <p>6 if I may ask, is -- the color represent the</p> <p>7 different area each congressman represent?</p> <p>8 Q. (BY MR. OVERING) That's right.</p> <p>9 A. I'm looking at -- I'm trying to</p> <p>10 see Terri Sewell area because Bullock, Pike,</p> <p>11 Barbour are the -- are the counties I'm</p> <p>12 familiar with, and Jefferson.</p> <p>13 This is the current mapping now,</p> <p>14 right?</p> <p>15 Q. This is the map that the state</p> <p>16 adopted after the census --</p> <p>17 A. Uh-huh.</p> <p>18 Q. -- which you and the other</p> <p>19 plaintiffs sued to get a new map.</p> <p>20 A. Uh-huh.</p> <p>21 Q. So, what was wrong with this map?</p> <p>22 MS. RUTAHINDURWA: Object to</p> <p>23 form.</p>	<p style="text-align: right;">Page 57</p> <p>1 in District 7 or District 6 in this map?</p> <p>2 A. Let me get a better look at this.</p> <p>3 According to this map here, I'll be in 7 with</p> <p>4 the coloring. I see Jefferson across the top</p> <p>5 up there in a -- in a pink color. That's</p> <p>6 what that's -- that's the district I'm in</p> <p>7 now, District 7.</p> <p>8 Q. Do you know what it means for a</p> <p>9 district to be compact?</p> <p>10 MR. RUTAHINDURWA: Object to</p> <p>11 form.</p> <p>12 A. Sure. Where you have a certain</p> <p>13 race of people geared in that particular</p> <p>14 district.</p> <p>15 Q. (BY MR. OVERING) Earlier, you</p> <p>16 used the phrase "dilution". What does that</p> <p>17 mean?</p> <p>18 A. It was diluted was the term that</p> <p>19 I used. Was it diluted? The dilution. Did</p> <p>20 I say diluted?</p> <p>21 Q. Well, I'm not sure. Did you say</p> <p>22 either one of those?</p> <p>23 A. What was your -- if I may ask,</p>

<p style="text-align: right;">Page 58</p> <p>1 what was your sense the reason why I gave 2 that response? I'm sorry about that. I just 3 want to make sure what your question was. 4 Q. Well, I think you were talking 5 about there being an even playing field. 6 A. Uh-huh. 7 Q. And you said some voters or some 8 voices are diluted. 9 A. That mean -- in reference to 10 diluted mean that their voices are not being 11 heard. I would think that would be -- their 12 voices really was not being heard. 13 Q. Do you know whether the 14 population in the Black Belt grew or shrank 15 in between 2010 and 2020? 16 A. I don't know statistics, but I 17 would say it shrank because of less 18 opportunity. 19 Q. Do you know what percentage of 20 Alabama's population is Black? 21 A. No, I don't. I don't know. I 22 don't know what percentage. 23 Q. Did you follow the legislative</p>	<p style="text-align: right;">Page 60</p> <p>1 in the Supreme Court case? 2 A. No. 3 Q. You didn't go to the oral 4 arguments in Washington? 5 A. No. No. 6 Q. Did you make any public 7 statements about the case before the Supreme 8 Court made its decision? 9 A. No. I was just waiting on the 10 decision. 11 Q. And what did the Supreme Court 12 say? 13 A. They agreed that it needs to 14 be -- that the redistricting needs to be. 15 They turned it back to Montgomery. This is 16 my understanding, what I thought I saw on 17 television. And Montgomery still -- was put 18 to make the decision. And that didn't work 19 out well. 20 Q. You said Montgomery. Did you 21 mean -- 22 A. The legislature. 23 Q. -- the legislature?</p>
<p style="text-align: right;">Page 59</p> <p>1 proceedings that led to the creation of this 2 map? 3 A. No, sir. I was aware of some of 4 the things that were being brought to 5 Montgomery, some of the decisions that was 6 made that was given to Montgomery to make the 7 decision. And the Supreme Court made the 8 decision if I'm not mistaken. Montgomery, I 9 guess, was kind of stubborn, I would say, and 10 did not do diligent. 11 Q. What do you mean stubborn? 12 A. Stubborn mean they didn't want to 13 make the change that was court ordered. 14 People don't like to give up power, do they? 15 They don't give up power -- 16 Q. You're talking about after the 17 Supreme Court -- 18 A. Right. 19 Q. -- got involved? 20 A. Right. The Supreme Court made 21 the decision for them to enact, and they 22 refused to do so. 23 Q. Did you read any of the documents</p>	<p style="text-align: right;">Page 61</p> <p>1 A. Yeah, the state government. 2 Q. The state government? 3 A. Right. Uh-huh. 4 Q. And when you said they were 5 stubborn -- 6 A. But the Supreme Court offered you 7 a decision to make according to what they 8 found. But from my understanding, because 9 the majority said they didn't like what the 10 Supreme Court was saying, they did not act 11 accordingly. 12 Q. Why didn't they like it, in your 13 opinion? 14 A. Power. No one wants to give up 15 power without a fight. So, the Supreme Court 16 apparently saw something that they felt that 17 should change. 18 Q. And who is in power in 19 Montgomery? 20 A. The majority, which is those who 21 make the decisions. 22 Q. You mean men? Most of the people 23 in government are men --</p>

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1 A. Yeah.

2 Q. -- right?

3 A. Exactly. But you have females

4 also down there.

5 Q. So, when you say the majority,

6 are you saying men are making the decisions

7 and not women; is that what you're talking

8 about?

9 MS. RUTAHINDURWA: Object to

10 form.

11 A. Well, we can say the Republicans

12 make the decisions --

13 Q. (BY MR. OVERING) I see.

14 A. -- too.

15 Q. So, the Republicans were stubborn

16 because they didn't want to give up power

17 after the Supreme Court decision?

18 A. I would say so. That's -- you

19 know, you've got your -- the Democrat and the

20 Republican, and the decision had to be made.

21 And the Supreme Court made the decision to

22 change the redistricting.

23 Q. And is the goal of this lawsuit

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1 to make those Republicans give up power?

2 MS. RUTAHINDURWA: Object to

3 form.

4 A. It's not the goal of -- it's not

5 the goal of the lawsuit, but it is the right

6 decision that came from the Supreme Court to

7 make the changes. It's not the -- it

8 shouldn't be a thing about power. It should

9 be a thing about what is right according to

10 what the Supreme Court say. We may not

11 always agree. But they made the ultimate

12 decision to change. And the change did not

13 come -- the change has not -- well, I guess

14 it's still going on. That they required the

15 change to be made. But there are those who

16 are in power don't want the change to be

17 made.

18 Q. (BY MR. OVERING) And how would

19 this lawsuit change who's in power?

20 A. It will make the voices that were

21 not heard be heard. Everybody want their

22 voice heard, right? And so, it got to

23 Supreme Court, and they listened to the case.

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1 And they made an objective decision, this is

2 what needs to happen.

3 Q. So, looking back at the map --

4 and you talked about Black people in Barbour

5 County, Bullock County --

6 A. Uh-huh.

7 Q. -- Pike County.

8 A. Uh-huh.

9 Q. And I think you said they don't

10 have a voice right now; is that right?

11 A. Their voices are not being heard.

12 So, you could say they don't have a voice.

13 Q. And is that because of

14 Republicans in Montgomery?

15 MS. RUTAHINDURWA: Object to

16 form.

17 A. Well, I would say the majority

18 who makes the decision, the decisions that

19 are being made are not in their favor.

20 Q. So, is the problem that the

21 candidate that they prefer doesn't always

22 win?

23 A. I would say so because they're

Page 65

1 the minority.

2 Q. Can your voice be heard even if

3 your preferred candidate loses?

4 A. Can your voice be heard for -- I

5 would think so because you just continue --

6 because we have lived -- we live in a

7 democratic society where the majority makes

8 the decision. And so, if I'm in the

9 minority -- I'm a minority, which there are

10 times where I've voted for certain issues, I

11 don't, you know -- I'm not destructive. You

12 know, that's just the democratic side.

13 You're either, you know, he won, you accept

14 it, and you move on.

15 Q. Did you vote for Governor Ivey in

16 the last election?

17 A. No, sir.

18 Q. And did you feel like your voice

19 was heard even though --

20 A. There are policies that she put

21 in place, I agree with. There are some that

22 I don't. And I made the ultimate decision

23 that the decision that she make is the

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1 decision she make. There are those who are  
 2 happy with it. There are those who are not  
 3 so happy. But I'm not one who's going to  
 4 fight against the democratic process because  
 5 she made a decision I don't like. Even with  
 6 a Democrat that's in office, there are people  
 7 he has to appease. And there are those who  
 8 feel like, you know, he's not appeasing them.  
 9 You just have to go along with it and  
 10 hopefully one day that the thought process  
 11 and the idea that you have, a candidate will  
 12 do accordingly.

13 MR. OVERING: Maybe this is a  
 14 good time for a break.  
 15  
 16 (Whereupon, a brief recess was  
 17 taken.)  
 18  
 19 Q. (BY MR. OVERING) Earlier, you  
 20 used the phrase "having a voice".  
 21 A. Uh-huh. Yes.  
 22 Q. And I thought I heard you say  
 23 that the people who did not vote for

Page 67

1 Congresswoman Sewell don't have a voice in  
 2 your district; is that right?  
 3 A. Let me rephrase it. The one who  
 4 did not vote for her probably didn't see  
 5 eye to eye with her policies. Democrat  
 6 process again. You have the right to vote  
 7 for any candidate of your choosing. Not all  
 8 candidates think like you on certain things.  
 9 So, guess what, you pick the next one who  
 10 think like you think. You know, she's the  
 11 overall objective winner. And so, she had to  
 12 speak -- she should be speaking for all, but  
 13 those who particularly put her there, those  
 14 are the ones that she's going to represent.  
 15 Q. Does she represent white  
 16 residents of her district in Congress?  
 17 A. I would think so. She represent  
 18 her district based on the needs of her  
 19 district whether they're white or Black.  
 20 Q. Does she represent Republican  
 21 residents of her district?  
 22 A. She does. Again, whether they  
 23 like or dislike, she's their representative.

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1 Q. What are the needs of her  
 2 district, of your district?  
 3 A. Jobs, education, better school  
 4 system, better health insurance.  
 5 Q. So, do those people who did not  
 6 vote for her have a voice in the democratic  
 7 process?  
 8 A. They do --  
 9 MS. RUTAHINDURWA: Object to  
 10 form.  
 11 A. -- have a voice.  
 12 They have a voice. The thing is,  
 13 when they're voting -- their vote is their  
 14 voice. Whether they vote yea or nay, their  
 15 vote is their voice.

16 Q. (BY MR. OVERING) Do you feel  
 17 like you have a voice?  
 18 A. My vote is my voice, yes.  
 19 Q. So, you've voted before?  
 20 A. I'm sorry. Say again.  
 21 Q. You have voted before?  
 22 A. Many times.  
 23 Q. When did you first register to

Page 69

1 vote?  
 2 A. It's eighteen, the age of  
 3 eighteen. I've been voting every year of my  
 4 life. I think it's a -- I think it's a  
 5 eighteen-year-old can be a registered voter.  
 6 Q. Do you vote in the general  
 7 elections?  
 8 A. In the general, presidential,  
 9 whatever it's about.  
 10 Q. Do you vote in the primaries?  
 11 A. Yes, sir.  
 12 Q. Do you vote in runoff elections?  
 13 A. Every opportunity. That's my  
 14 voice.  
 15 Q. When you registered to vote  
 16 around when you were eighteen --  
 17 A. Uh-huh.  
 18 Q. -- do you remember having any  
 19 problems registering?  
 20 A. No.  
 21 Q. Where did you register?  
 22 A. In Bullock County.  
 23 Q. Did you have to update your

<p style="text-align: right;">Page 70</p> <p>1 registration when you moved?</p> <p>2 A. Yes.</p> <p>3 Q. Did you have any problems</p> <p>4 updating your registration?</p> <p>5 A. No.</p> <p>6 Q. And are you currently registered</p> <p>7 in Jefferson County?</p> <p>8 A. That's correct.</p> <p>9 Q. Your family members, your</p> <p>10 brothers and sisters, nieces and nephews, do</p> <p>11 you know if they're registered to vote?</p> <p>12 A. They are. They --</p> <p>13 Q. Do you know if they've had any</p> <p>14 problems registering to vote?</p> <p>15 A. Not to my knowledge. If they</p> <p>16 have, they haven't shared it with me.</p> <p>17 Q. Have you ever helped anyone</p> <p>18 register to vote?</p> <p>19 A. No.</p> <p>20 Q. Have you ever heard of anyone</p> <p>21 having a problem registering to vote?</p> <p>22 A. No. The only problem I ever</p> <p>23 heard of, different polling locations that</p>	<p style="text-align: right;">Page 72</p> <p>1 A. No, I'm not aware of any.</p> <p>2 Q. Have you ever heard that there's</p> <p>3 racial discrimination in the voter</p> <p>4 registration process?</p> <p>5 A. No.</p> <p>6 Q. Are you married?</p> <p>7 A. Yes.</p> <p>8 Q. Do you have children?</p> <p>9 A. Three.</p> <p>10 Q. Are they adults?</p> <p>11 A. Yes.</p> <p>12 Q. Are they registered to vote?</p> <p>13 A. Yes. Yes. Two in Texas, one in</p> <p>14 Alabama.</p> <p>15 Q. And is your wife registered to</p> <p>16 vote?</p> <p>17 A. Yes, sir.</p> <p>18 Q. And did they have any problems</p> <p>19 registering to vote?</p> <p>20 A. No, sir.</p> <p>21 Q. Did the ones in Texas report any</p> <p>22 problem registering to vote?</p> <p>23 A. No. Just long lines.</p>
<p style="text-align: right;">Page 71</p> <p>1 they thought they were registered to vote</p> <p>2 there, but come to find out, they was in</p> <p>3 another whole different area to vote.</p> <p>4 Q. Could you explain that?</p> <p>5 A. Say, for instance, I'm registered</p> <p>6 to vote in the Ross Bridge area. And</p> <p>7 somebody else may think that they're</p> <p>8 registered to vote in the Ross Bridge area</p> <p>9 who have not been notified. They have to go</p> <p>10 to the area that they name appear on. Those</p> <p>11 are the only thing that I've seen happen in</p> <p>12 such a long period of time. People coming to</p> <p>13 the wrong polling location.</p> <p>14 Q. Why do they go to the wrong</p> <p>15 polling location?</p> <p>16 A. They've not been notified,</p> <p>17 they've not updated their information.</p> <p>18 Q. Okay. Does that problem have</p> <p>19 anything to do with race?</p> <p>20 A. I wouldn't think so.</p> <p>21 Q. Are you aware of any racial</p> <p>22 discrimination when it comes to registering</p> <p>23 to vote?</p>	<p style="text-align: right;">Page 73</p> <p>1 Q. Long lines?</p> <p>2 A. Yeah.</p> <p>3 Q. Have you encountered long lines</p> <p>4 in Jefferson County when you go to vote?</p> <p>5 A. Sometimes.</p> <p>6 Q. What time of day do you usually</p> <p>7 go to vote?</p> <p>8 A. Early in the morning or late in</p> <p>9 the evening before the poll close.</p> <p>10 Q. Do you think that the long lines</p> <p>11 have anything to do with racial</p> <p>12 discrimination?</p> <p>13 A. It's lack of help. I wouldn't</p> <p>14 think so. It's lack of help.</p> <p>15 Q. Lack of help?</p> <p>16 A. Lack of help. Lack of help.</p> <p>17 Just not able to deal with the long lines of</p> <p>18 the people that are coming to vote, making</p> <p>19 sure that they're registered voters, making</p> <p>20 sure their name is on the list sometimes can</p> <p>21 cause the late problem.</p> <p>22 Q. And are there any other reasons</p> <p>23 their names might not be on the list other</p>



<p style="text-align: right;">Page 74</p> <p>1 than that they went to the wrong place?</p> <p>2 A. Not that I could say why their</p> <p>3 name is not on the list. If you -- if you</p> <p>4 move in a certain location and you're not --</p> <p>5 and you did not go and let the registrar know</p> <p>6 that you moved, guess what, you're obligated</p> <p>7 to vote at the old location that you were at.</p> <p>8 You have to keep a update. And a lot of</p> <p>9 people don't keep a update file. They still</p> <p>10 think they're supposed to vote at the same</p> <p>11 place they voted years ago, but that's not</p> <p>12 the case.</p> <p>13 Even with myself leaving out of</p> <p>14 Bullock County -- I voted while I was in</p> <p>15 Bullock County. But when I came to Jefferson</p> <p>16 County, I had to reregister.</p> <p>17 Q. How did you know that you had to</p> <p>18 reregister?</p> <p>19 A. I can't vote in Jefferson County</p> <p>20 and vote in Bullock County. That's --</p> <p>21 that -- I'm no longer a resident. What</p> <p>22 happened back there does not affect me</p> <p>23 anymore. So, I'm in Jefferson County now.</p>	<p style="text-align: right;">Page 76</p> <p>1 across the street to Ross Bridge. General</p> <p>2 election, we vote at a church.</p> <p>3 Q. Was a polling place ever closed</p> <p>4 when you got there?</p> <p>5 A. No. Opened on time, closed on</p> <p>6 time.</p> <p>7 Q. And you've been voting for forty</p> <p>8 years?</p> <p>9 A. A little bit longer.</p> <p>10 Q. Have you ever voted absentee?</p> <p>11 A. I think once. I was poll</p> <p>12 watching, and so, I went and voted earlier.</p> <p>13 I think it was maybe the mayor race in</p> <p>14 Birmingham, I think. I might have voted</p> <p>15 absentee once.</p> <p>16 Q. Do you remember what you had to</p> <p>17 do to vote absentee?</p> <p>18 A. Fill out forms and show ID, stuff</p> <p>19 like that.</p> <p>20 Q. How did you figure out how to do</p> <p>21 that?</p> <p>22 A. There was some instruction and</p> <p>23 some staff member that was helpful helping us</p>
<p style="text-align: right;">Page 75</p> <p>1 So, I have to register and support the</p> <p>2 candidate that best serve my needs. But I</p> <p>3 can't live between the two counties and</p> <p>4 expect the same results. I'm only allowed to</p> <p>5 register in one county. Did I want to</p> <p>6 change, no, because I still love home. But</p> <p>7 it was the best thing for me.</p> <p>8 Q. Are you aware that in Alabama,</p> <p>9 there's a law that when you register to vote,</p> <p>10 you have to show some kind of identification?</p> <p>11 A. Sure.</p> <p>12 Q. Have you heard of anyone having</p> <p>13 problems with that?</p> <p>14 A. No.</p> <p>15 Q. Have you heard of anyone being</p> <p>16 racially discriminated when it comes to</p> <p>17 getting identification?</p> <p>18 A. No.</p> <p>19 Q. How far away is your polling</p> <p>20 place?</p> <p>21 A. About half a mile. Ross Bridge</p> <p>22 Parkway. There's two different type of</p> <p>23 voting sites for me. State, you vote -- go</p>	<p style="text-align: right;">Page 77</p> <p>1 do it.</p> <p>2 Q. Do you remember having any</p> <p>3 problem when you filled out those forms?</p> <p>4 A. No. No problem.</p> <p>5 Q. Did you experience any racial</p> <p>6 discrimination?</p> <p>7 A. No.</p> <p>8 Q. Other than that election, do you</p> <p>9 ever work at a polling place?</p> <p>10 A. Yes.</p> <p>11 Q. How often?</p> <p>12 A. I worked inside once. Mostly,</p> <p>13 I'm passing out leaflet with the candidate</p> <p>14 that I'm supporting. And I often do that.</p> <p>15 Q. Oh, you mean that you worked for</p> <p>16 a campaign outside of a polling place?</p> <p>17 A. Right. Then, I also worked -- I</p> <p>18 think it was the city that paid us -- inside</p> <p>19 when someone come in to register -- when</p> <p>20 someone come in to vote, you have this little</p> <p>21 pad of names in there.</p> <p>22 Q. Uh-huh.</p> <p>23 A. And so, you check them off as</p>



<p style="text-align: right;">Page 78</p> <p>1 they vote.</p> <p>2 Q. Right. What's that called when</p> <p>3 you work for the polling place? What are</p> <p>4 you --</p> <p>5 A. Gosh, I've done forgot. I only</p> <p>6 did it once. I'm mostly doing it, the</p> <p>7 candidate of my choice, passing out leaflets.</p> <p>8 It's poll worker, something like that. It's</p> <p>9 something of that nature.</p> <p>10 Q. What's on the leaflet that you</p> <p>11 pass out?</p> <p>12 A. The name, the qualification of</p> <p>13 the person, the experience of the person,</p> <p>14 stuff like that. Yeah.</p> <p>15 Q. How often have you done that?</p> <p>16 A. Many of time. Way back in</p> <p>17 college days. You've heard of Jim Sullivan,</p> <p>18 right?</p> <p>19 Q. Yes, sir.</p> <p>20 A. Ryan deGraffenried. Those names,</p> <p>21 a year back -- I think it was Democratic.</p> <p>22 The guy that just retired. What's his name?</p> <p>23 Katie Britt has his place.</p>	<p style="text-align: right;">Page 80</p> <p>1 Gosh, Don Siegleman. That's when I first</p> <p>2 started getting involved.</p> <p>3 Q. How many different candidates</p> <p>4 have you leafleted for outside of polling</p> <p>5 places?</p> <p>6 A. Many of them. Canvassing, just</p> <p>7 trying to -- I'm always active in some form</p> <p>8 or fashion.</p> <p>9 Q. Were some of them Black?</p> <p>10 A. Yes.</p> <p>11 Q. Were some of them white?</p> <p>12 A. DeGraffenried was.</p> <p>13 Q. And some of them were Democrats?</p> <p>14 A. Yes.</p> <p>15 Q. Were any of them Republicans?</p> <p>16 A. No. They were Democrat at that</p> <p>17 time, but they turned Republican, so --</p> <p>18 Q. Could you say that louder?</p> <p>19 A. They were Democrat at that time,</p> <p>20 I think. It was Jim Sullivan -- Jim</p> <p>21 Siegleman always been Democrat. But Jeff</p> <p>22 Sessions, I think he started out as a</p> <p>23 Democrat if I'm not mistaken. Am I right?</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Right. Doug Jones?</p> <p>2 A. Not Doug Jones. The one</p> <p>3 before -- Katie Britt is the -- is the junior</p> <p>4 senator. But -- gosh. You know his name.</p> <p>5 You've been around for a long time. But he</p> <p>6 retired.</p> <p>7 Q. You mean Senator Sessions?</p> <p>8 A. Sessions, exactly. Way back in</p> <p>9 those days, they were a Democrat. So,</p> <p>10 that'll tell you how long ago that has been.</p> <p>11 Q. Did you pass out leaflets with</p> <p>12 Senator Sessions on them?</p> <p>13 A. At that time, I wasn't into</p> <p>14 politics like I was when deGraffenried and</p> <p>15 Jim Sullivan and them was doing it. I did it</p> <p>16 then. That's when I really got involved.</p> <p>17 Sessions was a Democrat, I think, at first,</p> <p>18 and he decided to be a Republican.</p> <p>19 Q. Or maybe you were thinking of</p> <p>20 Richard Shelby?</p> <p>21 A. Gosh, you hit it on the head now.</p> <p>22 I knew you knew. I knew you'd know. So,</p> <p>23 somebody go back like -- but Jim Sullivan.</p>	<p style="text-align: right;">Page 81</p> <p>1 Did he start out as a Democrat and he</p> <p>2 changed? So, it's been so long ago now. I</p> <p>3 was new into the arena. So, there's a lot of</p> <p>4 things changed since then.</p> <p>5 Q. So, we talked about voter</p> <p>6 registration. We talked about voting.</p> <p>7 A. Uh-huh.</p> <p>8 Q. Is there any way that voting is</p> <p>9 harder for you because of your race?</p> <p>10 A. Is it harder for me? I think</p> <p>11 with voter's ID, state ID, stuff like that, I</p> <p>12 think they were put in place to make it more</p> <p>13 complicated for me to vote.</p> <p>14 Q. Why do you think that?</p> <p>15 A. Because your voting is your</p> <p>16 power. And so, that's power. Any time you</p> <p>17 have power, there will be challenges. And I</p> <p>18 think because of the new -- different new</p> <p>19 things they put in place, it does make it</p> <p>20 difficult for certain people. It could be</p> <p>21 white, Black, brown. But all these different</p> <p>22 types of photo ID you have to now, you didn't</p> <p>23 used to have all of that. But, now, you have</p>

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1 to.

2 Q. Doesn't it apply across the

3 board?

4 A. Sure, it does, but it's more

5 targeted towards, I feel, African American.

6 Q. Why do you think that?

7 A. Because the difference in opinion

8 and because, I'll say it again, there are

9 those who are in power who are looking for

10 ways to make it difficult for people to vote.

11 That's why the Voting Right -- Voting Right

12 Act was passed, to make it easier for people

13 to vote. But there are things that have

14 passed that make it difficult for people to

15 vote.

16 Q. Okay. But you've never heard of

17 anyone having a problem getting ID?

18 A. Exactly. I've never heard of

19 anybody having a problem. I'm not saying

20 it's not. But I've never heard of them.

21 Those are my own personal opinion.

22 Q. Everyone you know who wants to

23 get an ID can get an ID?

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1 A. I would say some, maybe some not.

2 But there are rumors that you hear, but you

3 don't know for sure. But as far as me

4 knowing anybody, I don't -- I don't know

5 anybody.

6 Q. Like, what kind of rumor?

7 A. Difficult time doing it,

8 difficult time in the line, difficult time

9 getting an ID, difficult time doing that.

10 Q. Have you gotten a new driver's

11 license in the past few years?

12 A. Have I gotten a new driver's

13 license?

14 Q. Right.

15 A. I guess about four years ago. I

16 think they expire in five. Mine's due next

17 year to be renewed.

18 Q. And how did you do that?

19 A. Went down to the office and took

20 a photo ID. If the line long, you've got to

21 wait, you know. A couple years ago, the

22 lines were hanging around the --

23 Q. Did you experience racial

Page 84

1 discrimination?

2 A. No.

3 Q. So, what specifically are the

4 rumors talking about, the rumors that say

5 there's racial discrimination getting

6 identification?

7 A. Specific rumors as far as people

8 discriminating against -- like, getting an

9 ID? I'm not -- I'm not -- some of the rumors

10 saying that it's kind of hard, lines are

11 long, or seemed like there's not enough help.

12 I've got to wait all day. Just basic --

13 Q. Right.

14 A. -- stuff like that.

15 Q. I know the feeling. But does it

16 have anything to do with race?

17 A. It could, could not based on how

18 you see it.

19 Q. How do you decide which candidate

20 to vote for?

21 A. If that candidate ideas and

22 thought lines up with mine's, I'm all in

23 whether they're Black, white, green, or

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1 yellow.

2 Q. Do you consider whether the

3 candidate is a Democrat or a Republican?

4 A. Do I consider that?

5 Q. Yes.

6 A. If their thought line up with

7 mine, no, it doesn't matter. Most of the

8 time when you have a candidate that you

9 study, that you look at their record, if that

10 record is lining up with what you think, what

11 you feel, then, you vote for the candidate.

12 Whether they win, lose, or draw, then, you

13 vote for that candidate because those are the

14 policies. If you're talking about jobs, if

15 you're talking about economic opportunity, if

16 you're talking about healthcare, those are

17 the things that really resonate with common

18 people like myself.

19 Q. Do you consider race when you're

20 deciding which candidate to vote for?

21 A. No, sir.

22 Q. Do you know people who do?

23 A. No. My family doesn't.

<p style="text-align: right;">Page 86</p> <p>1 Q. Do you consider yourself</p> <p>2 politically active?</p> <p>3 A. Do I consider myself</p> <p>4 politically -- yes, I would say so.</p> <p>5 Q. Are you a member of a political</p> <p>6 party?</p> <p>7 A. No, sir, not a member of a</p> <p>8 political party.</p> <p>9 Q. Have you ever been a member of a</p> <p>10 political party?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you ever been a leader of a</p> <p>13 political party?</p> <p>14 A. No, sir.</p> <p>15 Q. When you give out leaflets are</p> <p>16 you supporting a candidate or a party?</p> <p>17 A. It could be -- candidate mostly.</p> <p>18 Candidate mostly.</p> <p>19 Q. I've heard of people taking a</p> <p>20 blank ballot, and then, they'll fill out</p> <p>21 bubbles --</p> <p>22 A. Uh-huh.</p> <p>23 Q. -- and give it to someone and</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. -- education, are there any other</p> <p>2 issues that are especially important to you?</p> <p>3 A. Their belief is important to me.</p> <p>4 Their faith is important to me. Their</p> <p>5 concern with everyday people is concerned --</p> <p>6 is important to me.</p> <p>7 Q. Are there any issues on which you</p> <p>8 agree with Republicans?</p> <p>9 A. There are many issues I agree</p> <p>10 with them. I agree with them when they say</p> <p>11 healthcare for all. I agree with them when</p> <p>12 they say let's improve the teachers' pay. I</p> <p>13 agree with them when they say this bill, it's</p> <p>14 a bill that will include everyone, not just</p> <p>15 the rich and famous. I agree with them</p> <p>16 especially when we are talking about race,</p> <p>17 equal pay. I agree with all of that.</p> <p>18 Q. Have you ever run for office?</p> <p>19 A. No, sir.</p> <p>20 Q. Do you have any plans to run for</p> <p>21 office?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you done any other work with</p>
<p style="text-align: right;">Page 87</p> <p>1 say, this is who should vote for.</p> <p>2 A. Uh-huh.</p> <p>3 Q. Is that one of the things that</p> <p>4 you do outside?</p> <p>5 A. I don't -- I don't -- I don't do</p> <p>6 that. I only -- when there's a candidate</p> <p>7 that I know of and I know his record, then,</p> <p>8 that's the candidate -- all I want is</p> <p>9 information on his qualification. Other</p> <p>10 people, I don't want to vouch for because I</p> <p>11 don't know them that way. So, just give me</p> <p>12 one candidate that I know that I'm going to</p> <p>13 support from day one, and I'll stick with</p> <p>14 that candidate.</p> <p>15 Q. But you've only ever helped a</p> <p>16 Democratic candidate, right?</p> <p>17 A. Correct.</p> <p>18 Q. Why is that?</p> <p>19 A. Because their thoughts and ideas</p> <p>20 lines up with mine's.</p> <p>21 Q. Other than jobs, economy,</p> <p>22 healthcare --</p> <p>23 A. Education.</p>	<p style="text-align: right;">Page 89</p> <p>1 a political campaign aside from the</p> <p>2 leafletting?</p> <p>3 A. Gone to meetings, stuff like</p> <p>4 that, learn the candidate, get some basic</p> <p>5 information about the candidate, and to know</p> <p>6 whether his thoughts or ideas lines up with</p> <p>7 mine's.</p> <p>8 Q. Did you ever give money to a</p> <p>9 political campaign?</p> <p>10 A. To my nephew.</p> <p>11 Q. What happens at those meetings</p> <p>12 for a campaign?</p> <p>13 A. What happened in the meeting with</p> <p>14 my nephew?</p> <p>15 Q. No. You said you go to meetings</p> <p>16 for a political campaign.</p> <p>17 A. Right. They state what they</p> <p>18 believe, what they stand for, ask for a</p> <p>19 donation, they ask for help and volunteer,</p> <p>20 stuff like that.</p> <p>21 Q. Do you know who your state</p> <p>22 senator is?</p> <p>23 A. Gosh. If you hadn't said it, I</p>

<p style="text-align: right;">Page 90</p> <p>1 would have told you. Gosh. Gosh. I'll 2 think of it. I just can't think of it right 3 now. 4 Q. Do you know who your state house 5 representative is? 6 A. Gosh, man. I've been voting for 7 the person and can't even think of his name. 8 Q. Do you know who your mayor is? 9 A. Yeah. Randall Woodfin. Even 10 though I have a Bessemer ZIP Code, I vote out 11 of Birmingham. 12 Q. I thought you lived in Bessemer. 13 A. Just the mayor come out of 14 Bessemer. Everything I do out of Birmingham. 15 Kind of strange, isn't it? 16 Q. Do you know who your county 17 commissioner is? 18 A. It's not Sheila Smoot. I'm not 19 even thinking of none that right now, man. 20 I'm sorry. I've just got a cloudy mind right 21 now. 22 Q. Or any of your city council 23 members?</p>	<p style="text-align: right;">Page 92</p> <p>1 A. First African-American sheriff. 2 THE COURT REPORTER: I didn't 3 hear you. 4 A. First African-American sheriff, 5 Petway is. 6 Q. (BY MR. OVERING) What about your 7 probate judge? 8 A. I can't think of the name. 9 Q. Do you know any local judges? 10 A. Gosh. No. I know them, but, 11 like I say, I can't think of who they are 12 right now. 13 Q. Are most of your representatives 14 Democrats? 15 A. Some are. I think -- mostly -- 16 yeah, most of them are Democrat. Uh-huh. 17 Q. And what are they doing on the 18 issues you care about, like jobs and the 19 economy? 20 A. Not much. Doesn't seem like much 21 has changed. Everything seem like it's 22 stabilized. It's like -- 23 THE COURT REPORTER: I can't hear</p>
<p style="text-align: right;">Page 91</p> <p>1 A. Yeah, I know -- Smitherman. What 2 some of the other ones are? 3 Q. Smitherman. 4 A. Some of the other ones, I can't 5 think of the name of some of the ones that we 6 voted for. 7 THE COURT REPORTER: I can't hear 8 you. 9 THE WITNESS: I'm sorry. 10 A. I can't think of some of the 11 other names that -- there was a Smitherman. 12 Just a whole lot of change that has been 13 made. 14 Q. (BY MR. OVERING) Is Smitherman 15 white or Black? 16 A. She's Black. 17 Q. Do you know who your sheriff is? 18 A. Petway. 19 Q. Petway? 20 A. Uh-huh. 21 Q. And is he or she white or Black? 22 A. Black. 23 Q. Black.</p>	<p style="text-align: right;">Page 93</p> <p>1 you. 2 A. Everything -- seemed like 3 everything has stabilized. That's why we 4 vote and put new people in. 5 Before Sheriff Petway, you had 6 some of the other guys -- like I say, my 7 mind's blank -- that were sheriff that I also 8 voted for. And so, that didn't work out 9 well. Mike Hale. 10 Q. (BY MR. OVERING) Have you ever 11 contacted any of your representatives in the 12 state or local government? 13 A. I've talked with Anthony Daniels, 14 who's my nephew. 15 Q. Right. But any way -- 16 A. I talked with Bobby Singleton, 17 attorney for the county commissioner. I 18 spoke with Katie Britt. 19 Q. What did you talk to her about? 20 A. She came over -- we were 21 tailgating at the Magic City Classic. And 22 she was part of our setup. And we just 23 talked about Congress, just small stuff. And</p>

<p style="text-align: right;">Page 94</p> <p>1 I talked to her husband. He played football 2 at Alabama. It seemed like he's about six 3 nine. An intimidating figure. But, yeah, 4 I've talked to her. You know, she came over. 5 We all had this conversation about different 6 stuff. 7 Q. Did you talk to her about jobs or 8 the economy? 9 A. Well, I told her that I wish her 10 well. Like I say, it was a casual setting. 11 Basically, be strong, keep the faith, and do 12 what you've got to do to keep it -- you know, 13 keep it going. 14 Q. Do you feel like she listened to 15 you? 16 A. Yeah. She was real friendly. 17 Like I say, she and the whole family came in. 18 And we made provision for her. It was just 19 like a family gathering. And she fit right 20 in. She enjoyed herself. She was thankful. 21 We all had this smile, smile, smile, and we 22 went our separate ways after she left. 23 Q. Did you vote for her?</p>	<p style="text-align: right;">Page 96</p> <p>1 leaders are in the Alabama Democratic Party? 2 A. Current leaders? You're talking 3 about the house minority on down? 4 Q. Well, the state party. 5 A. I know my nephew is the minority 6 leader, and you've got other people with 7 different titles, junior minority leader and 8 stuff like that. 9 Q. Who runs the party, generally? 10 A. The Democratic Party? 11 Q. Yes. 12 A. They all do. I don't think it's 13 no one particular person. They all have a 14 voice in it. 15 Q. Do you think the Alabama 16 Democratic Party is strong right now? 17 A. As best they can be. 18 Q. Do you think they are finding 19 strong candidates to run for office? 20 A. Some of the ones I know, I'd say 21 so. They have to go along to get along. 22 Q. Did you hear about in the 2022 23 elections that there were certain offices</p>
<p style="text-align: right;">Page 95</p> <p>1 A. Did I vote for Katie Britt? No. 2 Q. Have you ever signed a political 3 petition? 4 A. No. 5 Q. Do you remember when Doug Jones 6 ran for senate in 2017? 7 A. I remember. Uh-huh. 8 Q. Against Roy Moore? 9 A. Yeah, I remember. 10 Q. Who'd you vote for? 11 A. Doug Jones. 12 Q. How come? 13 A. Based on the rumors and Doug 14 Jones' civil right history. I looked at his 15 past work, and I was really pleased with it. 16 Representation of certain groups of people. 17 Q. What do you mean? 18 A. Sixteenth Street bombing. 19 Remember the Sixteenth Street bombing? 20 Q. Yes. 21 A. He was the little girl lawyer who 22 brought justice. 23 Q. Do you know who the current</p>	<p style="text-align: right;">Page 97</p> <p>1 that Democrats didn't have a candidate for? 2 A. I didn't hear it. I didn't hear 3 it. 4 Q. Did you hear about any of the 5 struggles over who would lead the Alabama 6 Democratic Party? 7 A. No, I didn't hear about that 8 either. 9 Q. Do you know who Judge Bill Lewis 10 is? 11 A. No, sir. 12 Q. Do you know who Yolanda Flowers 13 is? 14 A. That's -- Yolanda Flowers? 15 That's not the -- from the Olympic young 16 lady, is it? 17 Q. I'm sorry? 18 A. Yolanda Flowers is not from the 19 Olympic, is it? That's who the lady -- 20 you're talking about the young lady who be in 21 the track and field Olympic? 22 Q. No. 23 A. I don't know.</p>



<p style="text-align: right;">Page 98</p> <p>1 Q. Do you know who's running for 2 Congress in District 2? 3 A. District 2? Yeah. Who ran -- 4 you've got Shomari Figures, and I can't think 5 of the other person name. 6 Q. Is it Caroleene Dobson? 7 A. She came out of nowhere, didn't 8 she? 9 Q. Who do you think will win? 10 A. Kind of hard to say. Kind of 11 hard to say. She has a great chance of 12 winning. Figures has a chance if they come 13 together. He might. I don't know. I don't 14 know. She has an opportunity. 15 Q. She has an opportunity? 16 A. Yeah. 17 Q. And he has an opportunity? 18 A. Exactly. If her -- if her -- if 19 her belief lines up with the majority of 20 those who will support her, she will win. 21 Q. Have you ever felt like you 22 wanted to be more politically engaged in the 23 Democratic Party?</p>	<p style="text-align: right;">Page 100</p> <p>1 A. The different views. You may 2 want to be the party leaders. There may be 3 those who grew up with you who can remember 4 something you've done. And I've seen that 5 happen. And they will bring it to the 6 forefront just to get who they want in there. 7 Like, give me the better qualified -- the 8 best qualified person. That's why I say you 9 have to go along to get along. If you have 10 something that has gone on with you as a -- 11 as a young -- or as a person who is out there 12 in the world, all of a sudden, you've changed 13 your life. Politics are more engaged with 14 bringing the negative part of what you've 15 done instead of looking at the good or the 16 person. 17 Q. So, there are sometimes personal 18 disputes -- 19 A. Well, sure, it is. 20 Q. -- within the party? 21 A. Most definitely. 22 Q. Are there disagreements over 23 political issues, positions, policies?</p>
<p style="text-align: right;">Page 99</p> <p>1 A. No. I'm at my limit because I 2 know how a party works. No. 3 Q. Could you say that again? 4 A. I say, I'm at my limit, which 5 simply means that I'm satisfied where I'm at 6 because I know how the party work. 7 Q. What does that mean? 8 A. Go along, get along. But you may 9 believe is not necessarily how it's going to 10 go. 11 Q. Within the party? 12 A. Exactly. I've seen friends run 13 into trouble because they had different 14 ideas. I've seen friends who other people go 15 against because they had different ideas. 16 That's not who I am. I respect your opinion, 17 you respect my opinion, we have a mutual 18 agreement. But what I've seen, if you don't 19 go along to get along, then, there's trouble. 20 Q. So, there are different views 21 within the party on certain issues? 22 A. Exactly. 23 Q. Do you have any examples?</p>	<p style="text-align: right;">Page 101</p> <p>1 MS. RUTAHINDURWA: Object to 2 form. 3 A. Yes. Yes, there is. Many 4 disagreement. 5 Q. (BY MR. OVERING) Like what? 6 A. If you want a certain bill passed 7 because that's what your constituents want, 8 there may be another person who says, no, 9 this one ain't good. And so, the clash comes 10 about between you and that particular person 11 who have that disagreement. But you know 12 that the people who put you there is trying 13 to get this particular bill passed. And I've 14 seen that happen. So, when you have that 15 clash, there's got to be some kind of 16 understanding and not a falling out. 17 Q. Well, so, when you vote in a 18 Democratic primary -- 19 A. Uh-huh. 20 Q. -- there are sometimes many 21 different candidates, right? 22 A. Uh-huh. Exactly. 23 Q. But they're all Democrats?</p>



<p style="text-align: right;">Page 102</p> <p>1 A. Exactly.</p> <p>2 Q. And they disagree on certain</p> <p>3 issues, right?</p> <p>4 A. Uh-huh. Yes.</p> <p>5 Q. And did you ever vote for a</p> <p>6 candidate in a primary who didn't win?</p> <p>7 A. Sure, I have, many a time.</p> <p>8 Q. Okay. And maybe we covered this</p> <p>9 earlier. But did you feel like you had a</p> <p>10 voice?</p> <p>11 A. Yes. Democratic process. I</p> <p>12 voted for Doug Jones. Did he win?</p> <p>13 Q. Right.</p> <p>14 A. But I'm still supportive of the</p> <p>15 decisions that are being made whether I like</p> <p>16 him or not.</p> <p>17 Q. Your nephew, Anthony Daniels --</p> <p>18 A. Uh-huh.</p> <p>19 Q. -- he ran for Congress in the</p> <p>20 second district, right?</p> <p>21 A. Uh-huh. Uh-huh.</p> <p>22 Q. In the primary?</p> <p>23 A. Yes, sir.</p>	<p style="text-align: right;">Page 104</p> <p>1 generation of his forefathers in Mobile. He</p> <p>2 was crushed in Conecuh. Those counties --</p> <p>3 can I see your map for a second? I'll tell</p> <p>4 you what actually happened.</p> <p>5 Washington, he was crushed.</p> <p>6 Choctaw, he did okay. Clarke, he was</p> <p>7 crushed. Those counties that came to the</p> <p>8 forefront that knew Shomari Figures, they</p> <p>9 voted for him in record numbers.</p> <p>10 Q. Figures is from the Mobile area,</p> <p>11 though, right?</p> <p>12 A. His mom and daddy was</p> <p>13 politicians. They were well known. I had</p> <p>14 friends -- I never heard of them before. I</p> <p>15 had a guy, he said, man, you know, those</p> <p>16 Figures are well known down in that area.</p> <p>17 And I got a chance to know firsthand how well</p> <p>18 known he is, very loyal people to him. He</p> <p>19 never been in politics. He came out of</p> <p>20 Washington.</p> <p>21 Q. But he's --</p> <p>22 A. His folks --</p> <p>23 Q. -- from Washington?</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. And what happened in the primary?</p> <p>2 A. He was outvoted. There was a</p> <p>3 certain county he did not win.</p> <p>4 Q. Did he get a lot of support?</p> <p>5 A. He got quite a bit of support for</p> <p>6 an unknown candidate in a certain area.</p> <p>7 Q. Did he get endorsements?</p> <p>8 A. Sure, he did. Quite a few.</p> <p>9 Q. Did he get donations?</p> <p>10 A. Sure, he did. He got one from</p> <p>11 me. He did. He did. He got quite a few.</p> <p>12 He didn't start out that way, but people</p> <p>13 began to know who he were. They began to</p> <p>14 contribute to his campaign. He's not going</p> <p>15 anywhere.</p> <p>16 Q. He had successful advertisements</p> <p>17 and commercials?</p> <p>18 A. I would say so.</p> <p>19 Q. And he started to get momentum?</p> <p>20 A. Exactly.</p> <p>21 Q. And then, what happened?</p> <p>22 A. You've got Shomari Figures, who</p> <p>23 is a well-known connection through a</p>	<p style="text-align: right;">Page 105</p> <p>1 A. Yeah, his folks are well abreast.</p> <p>2 I think his mom is maybe a lawyer, been in</p> <p>3 politics or something.</p> <p>4 Q. So, did your nephew have the same</p> <p>5 support from the Democratic Party as Figures</p> <p>6 from the party leaders?</p> <p>7 MS. RUTAHINDURWA: Object to</p> <p>8 form.</p> <p>9 A. I think he had more, but when it</p> <p>10 came to voting, Figures are well known.</p> <p>11 They're well established. So, that's how it</p> <p>12 all came about.</p> <p>13 Q. (BY MR. OVERING) That's just</p> <p>14 democracy?</p> <p>15 A. Exactly. People vote according</p> <p>16 to what they feel line up with their thoughts</p> <p>17 and ideas.</p> <p>18 Q. Did your nephew ever complain</p> <p>19 about having to run against somebody from</p> <p>20 Mobile and --</p> <p>21 A. He knew he was facing an uphill</p> <p>22 battle. He knew. He came up and said, Uncle</p> <p>23 Bob, it ain't looking good.</p>

<p style="text-align: right;">Page 106</p> <p>1 Q. And where does Anthony live?</p> <p>2 A. Huntsville.</p> <p>3 Q. And did he feel like he could</p> <p>4 relate to voters in Mobile?</p> <p>5 MS. RUTAHINDURWA: Object to</p> <p>6 form.</p> <p>7 A. I'm sure he could, but he was</p> <p>8 behind the eight ball because the Figures are</p> <p>9 well-known politicians or lawyers, whatever</p> <p>10 you may want to call it. They are part --</p> <p>11 the people down there are loyal to the</p> <p>12 Figures. There was nothing he could do about</p> <p>13 it. He knew. He came and said, Uncle Bob,</p> <p>14 there's essentially nothing I could do in</p> <p>15 Mobile and all those area. And it showed in</p> <p>16 the stat that he was ahead. But when Mobile</p> <p>17 came in, it was a dump. It was like putting</p> <p>18 somebody out of their misery. I mean, Mobile</p> <p>19 really turned out. And those other counties,</p> <p>20 like here Washington, those counties voted</p> <p>21 maybe eighty to ninety percent for Figures.</p> <p>22 Montgomery, you know. He got most of -- my</p> <p>23 nephew got some of Montgomery, but Figures</p>	<p style="text-align: right;">Page 108</p> <p>1 were from Mobile. He mentioned it. He said,</p> <p>2 you talking about the Figures down there? He</p> <p>3 said, they've got Mobile locked down.</p> <p>4 Q. (BY MR. OVERING) And they help</p> <p>5 people down there?</p> <p>6 A. Apparently so. I had never heard</p> <p>7 of them before until, you know, get some</p> <p>8 information saying -- and my nephew kind of</p> <p>9 assured me. Man, it's not looking good out</p> <p>10 Mobile. And was it not looking good. It was</p> <p>11 a bombardment.</p> <p>12 Q. What do you think the number one</p> <p>13 policy issue was in that primary campaign?</p> <p>14 A. Down in Mobile? I mean, District</p> <p>15 2, number one?</p> <p>16 Q. Right.</p> <p>17 MS. RUTAHINDURWA: Object to</p> <p>18 form.</p> <p>19 A. In my area that I'm familiar</p> <p>20 with, he talked about you finally have a</p> <p>21 voice, that's what my nephew would tell</p> <p>22 Bullock, Russell, Macon, Barbour. You</p> <p>23 finally have a voice. And they could relate.</p>
<p style="text-align: right;">Page 107</p> <p>1 did a wonderful job. But when the runoff</p> <p>2 came --</p> <p>3 Q. (BY MR. OVERING) Daniels did</p> <p>4 better in Montgomery than he did in Mobile?</p> <p>5 A. Yeah. He did much better. Much</p> <p>6 better.</p> <p>7 Q. Why do you think that is?</p> <p>8 A. Democratic process. People who</p> <p>9 know the Figures, you know, know they stand</p> <p>10 for what they've done many years. And they</p> <p>11 felt loyal to them. And they voted in that</p> <p>12 way.</p> <p>13 Q. Couldn't part of it have been</p> <p>14 that they thought Figures would be more</p> <p>15 responsive to their needs?</p> <p>16 A. They could have.</p> <p>17 MS. RUTAHINDURWA: Object to</p> <p>18 form.</p> <p>19 A. I'm sure that was part of it and</p> <p>20 the overall commitment of years the Figures</p> <p>21 have been a name to be reckoned with. They</p> <p>22 have a strong reputation.</p> <p>23 I've got a friend of mine's who</p>	<p style="text-align: right;">Page 109</p> <p>1 They turned out for him in numbers. But</p> <p>2 here's the thing with Barbour, Russell, and</p> <p>3 Bullock, the population has deteriorated.</p> <p>4 So, there's not a whole lot of people there</p> <p>5 anymore. So, with Mobile being as big as it</p> <p>6 is, guess what? When Mobile came in, all</p> <p>7 that lead he had was just totally demolished.</p> <p>8 Q. (BY MR. OVERING) So, Daniels</p> <p>9 said to people in Barbour, Bullock --</p> <p>10 A. Lee -- I mean, Barbour, Bullock,</p> <p>11 Macon, and Russell, surrounding county. He</p> <p>12 did well. Don't get me wrong, he did well,</p> <p>13 but there is just simply not enough people to</p> <p>14 sustain him with the lead that came from down</p> <p>15 in there where the Figures is, Mobile,</p> <p>16 Marengo -- several counties, Mobile,</p> <p>17 Washington, Conecuh, those other counties.</p> <p>18 Q. So, do you agree that you -- with</p> <p>19 your nephew that he would have been a better</p> <p>20 representative for those people in Barbour</p> <p>21 and Bullock?</p> <p>22 A. Most --</p> <p>23 MS. RUTAHINDURWA: Object to</p>

<p style="text-align: right;">Page 110</p> <p>1 form.</p> <p>2 A. Most definitely because he grew</p> <p>3 up as a -- as a first generational -- being a</p> <p>4 sharecropper. He's just first generational.</p> <p>5 His mom and myself that came before, we were</p> <p>6 all sharecroppers. And he, himself, was</p> <p>7 born, you know.</p> <p>8 Q. (BY MR. OVERING) And there's a</p> <p>9 lot of farming out there?</p> <p>10 A. That's what the livelihood was,</p> <p>11 farming, Generational farmers.</p> <p>12 Q. Do you think Figures understands</p> <p>13 what Black farmers need?</p> <p>14 MS. RUTAHINDURWA: Object to</p> <p>15 form.</p> <p>16 A. My personal opinion?</p> <p>17 Q. (BY MR. OVERING) Yes.</p> <p>18 A. No. Because Daniel grew up in</p> <p>19 the environment, seeing his mom and his</p> <p>20 grand -- seeing his -- seeing his mom,</p> <p>21 grandmother, grandfather, uncles, auntie come</p> <p>22 up that way even though he was small, young,</p> <p>23 first generational. Without being a</p>	<p style="text-align: right;">Page 112</p> <p>1 trust Figures more so because they grew up</p> <p>2 knowing him.</p> <p>3 Q. (BY MR. OVERING) Right. Right.</p> <p>4 Is there less farming in Mobile than out</p> <p>5 east?</p> <p>6 A. I don't know much about Mobile</p> <p>7 farming, but I do know about Bullock,</p> <p>8 Russell, Barbour. That's the area I built a</p> <p>9 farm in, surrounding area, and that's all we</p> <p>10 knew. There was nothing else. We didn't</p> <p>11 know anything else.</p> <p>12 I grew up on a plantation. Let</p> <p>13 me just make it clear. So, when you grow up</p> <p>14 on a plantation, guess what, you learn how to</p> <p>15 survive. You learn how to take the bare</p> <p>16 minimum and you make it work for you. So,</p> <p>17 for generational, it's all we knew.</p> <p>18 So, when Anthony came along, he</p> <p>19 had opportunity that some of us had already</p> <p>20 got from down in the Black Belt to show him</p> <p>21 that there was a different life that he could</p> <p>22 inherit, he could have so many things that he</p> <p>23 always wanted. But what Anthony did, Anthony</p>
<p style="text-align: right;">Page 111</p> <p>1 generational farmer, he knew. And he could</p> <p>2 relate to the ones in that particular area.</p> <p>3 That's why they voted for him overwhelmingly</p> <p>4 because they -- his campaign was, he's one of</p> <p>5 us.</p> <p>6 Q. What does that mean, one of us?</p> <p>7 A. One of us mean that he understand</p> <p>8 the needs of these counties. He understands</p> <p>9 where we are going -- what people here are</p> <p>10 going through. It's not that he made it and</p> <p>11 not that he's doing so well with his life</p> <p>12 that he forgotten about the ones that are not</p> <p>13 so fortunate. And so, his slogan, he's one</p> <p>14 of us. He knows the needs that we have. He</p> <p>15 understand our needs. He's there for us.</p> <p>16 He's our voice. He's our hope.</p> <p>17 Q. People in Barbour have different</p> <p>18 needs than people in Mobile?</p> <p>19 MS. RUTAHINDURWA: Object to</p> <p>20 form.</p> <p>21 A. I would think so, because they</p> <p>22 all have the same goal, to have a voice that</p> <p>23 someone who understand their need. And they</p>	<p style="text-align: right;">Page 113</p> <p>1 decided to run for a political office. I did</p> <p>2 not. But I encouraged him to do so. He have</p> <p>3 a knack and charisma. If you ever met him --</p> <p>4 have you met him before?</p> <p>5 Q. No.</p> <p>6 A. That you will understand that</p> <p>7 he's -- I don't get it, man. Because I</p> <p>8 remember Anthony and I had some disagreement,</p> <p>9 put it like that, family disagreement,</p> <p>10 personal. And there was things that he was</p> <p>11 doing I wasn't pleased with. I thought he</p> <p>12 was going the wrong way. Because when my mom</p> <p>13 died, which is his grandmamma, he really took</p> <p>14 it personal. And I said to him, if you want</p> <p>15 to do something with your life, make your</p> <p>16 grandmamma proud. Never thought he'd get</p> <p>17 into political. And this is seriously.</p> <p>18 And so, I said, man, you're doing</p> <p>19 all that crying, but you won't be able to</p> <p>20 bring Mom back. He was on the wrong -- he</p> <p>21 was on the wrong end at that time. So, we</p> <p>22 talked about it. And so, I showed him some</p> <p>23 example. I would bring him to Birmingham,</p>

<p style="text-align: right;">Page 114</p> <p>1 show him the things that he needed to do to 2 turn his life around. 3 So, he caught wind that there was 4 another guy. I don't know if y'all remember 5 this guy named Gregory Gray. He was an 6 attorney. 7 THE WITNESS: How many of y'all 8 know the guy name that over AEA? Do you know 9 Joe Reed? How many of y'all know Joe Reed? 10 Q. Right. 11 A. So, I don't even got to say no 12 more. Joe Reed handpicked Gregory Gray to be 13 his successor. But Gray didn't live long 14 enough. You're aware of it. 15 Q. Did Joe Reed have any involvement 16 in the Democratic primary in District 2? 17 A. Yes, he did. 18 Q. And what did he do? 19 A. Support Shomari Figures. 20 Q. Was that a big factor? 21 A. I would think so. 22 Q. Do you support Joe Reed as a 23 leader in the Democratic Party?</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Personal vendetta? 2 Q. No. 3 A. National Education Association. 4 When I say personal vendetta, Joe 5 is like -- he don't forget anything. If you 6 cross Joe as a boy, he'll get you thirty, 7 forty, fifty years down the road. 8 Q. Wow. 9 A. That's Joe. Joe doesn't bite his 10 tongue. 11 Q. Are most of the supporters of 12 Figures Black? 13 MS. RUTAHINDURWA: Object to 14 form. 15 A. I cannot say. I don't know. 16 I've never met him before. He came out of 17 Washington with a full deck card, Krypton, 18 all the other goodies. And he got the 19 position. 20 Q. (BY MR. OVERING) All the other 21 goodies and what? 22 A. Goodies mean that support, 23 financial support. They had never held a</p>
<p style="text-align: right;">Page 115</p> <p>1 A. Do I support Joe Reed? 2 Q. Yes. 3 A. We have different thoughts and 4 ideas. Joe handpicked my nephew, Gregory 5 Gray, which he's aware of. Joe did things 6 the old way. And whether you agree with Joe 7 or not, Joe's hard core. Joe says what Joe 8 mean whether you like it or not. 9 No, I don't agree with Joe on so 10 many things. I didn't agree with Joe when he 11 chose Shomari Figures over my nephew. 12 Q. Right. Why do -- 13 A. But if Greg would have been here, 14 he wouldn't have did that. 15 Q. Why do you think he chose -- 16 A. I think -- 17 Q. -- Figures? 18 A. There's AEA. There's NEA. My 19 nephew took NEA. Like I said, Joe don't 20 forget anything. Joe take personal vendetta 21 against people who cross him. 22 Q. I'm sorry. What does that mean, 23 NEA?</p>	<p style="text-align: right;">Page 117</p> <p>1 political office, but Figures learned a shrew 2 way of politics and it worked for him. 3 Q. Some Black voters in the Mobile 4 area voted for Figures. 5 A. Uh-huh. 6 Q. I think you said eighty percent 7 or ninety percent of the electorate? 8 A. Uh-huh. 9 Q. But fewer in the farmlands and 10 the country voted for him in the primary. 11 More of them voted for Daniels. Why do you 12 think that is? 13 A. They can relate to Daniels having 14 grandparents that were sharecroppers or -- 15 because you're looking at older people who 16 understand the way of life that my parents 17 had. And so, he resonate with those people. 18 Now, on the other hand, with 19 Figures, I don't know a whole lot about him, 20 man. But, you know, you hear things. But, 21 you know, I don't know. I've never met him 22 before. I know he would come down there. He 23 wasn't well received.</p>

<p style="text-align: right;">Page 118</p> <p>1 Q. Have you ever met Caroleene 2 Dobson, his opponent? 3 A. No, I have never. 4 Q. And if she wins in November -- 5 A. Uh-huh. 6 Q. -- what would that say to you 7 about her district? 8 A. If she -- what it would say to me 9 is that whatever her district ideas or 10 whatever her district wanted or whatever her 11 district brought to the table, they felt more 12 confident that she could deliver for them. 13 So, in the democratic process, they voted for 14 her. No problem with that. 15 Q. And she would then represent 16 everyone in the district? 17 A. Exactly. Bullock, Russell, you 18 know. Even though never heard of her before 19 down in that area. 20 Q. Have you ever heard that voting 21 in Alabama is racially polarized? 22 A. No. I have not heard that. 23 Q. Is it true that Black voters in</p>	<p style="text-align: right;">Page 120</p> <p>1 Alabama will be more supportive of Kamala 2 Harris than they were of Joe Biden? 3 A. I would think so. She brings a 4 little more excitement. I think they can 5 resonate with younger people. Joe probably 6 don't even text or Facebook, but she does. 7 So, guess what? That brings a whole other 8 energy to the table. If you had to go to a 9 concert, which one would you go to? Which 10 one would be more exciting? I'm sorry. I 11 mean, people like excitement, and that's what 12 they're enthused about, you know. 13 Q. Going back to Mobile -- 14 A. Uh-huh. 15 Q. -- do you think that residents of 16 Mobile relate more to a candidate who knows 17 more about business and industry or who knows 18 more about farming and rural interests? 19 MS. RUTAHINDURWA: Object to 20 form. 21 A. Business and industry, I would 22 say, and lawyer. When you're a lawyer for 23 somebody, they're just a political machine.</p>
<p style="text-align: right;">Page 119</p> <p>1 Alabama usually vote for a Democrat? 2 A. The evidence speak for itself. I 3 would say so. 4 Q. Is that true only in Alabama? 5 A. Well, I think it's nationwide. 6 You've got some that feel that the Democratic 7 Party represent their ideas, listen to their 8 complaints. 9 Q. Why is that? 10 A. You listen to people who you 11 think is going to help you get to where you 12 need to be. And so, what Democrats are 13 saying and bring to the forefront, people 14 can -- people can kind of, like, register 15 with that or they want more education -- they 16 want education, they want -- they want high 17 paying jobs, things like that. And so, they 18 feel more comfortable in that aspect voting 19 for a Democrat if the ideas line up. 20 Everybody ideas don't line up with the 21 Democrat. That's why we, you know, have got 22 a two-party system. 23 Q. Do you think that Black voters in</p>	<p style="text-align: right;">Page 121</p> <p>1 There's nothing what you're going to ask 2 about. There will come a day that nothing 3 you could do wrong. Everything you throws up 4 goes in. And they love Shomari Figures and 5 his family. They can resonate with him. 6 They feel that he's one of theirs. 7 Q. (BY MR. OVERING) Would it help 8 him in Mobile if he had a farming background? 9 MS. RUTAHINDURWA: Object to 10 form. 11 A. I wouldn't think so. Shomari 12 Figures and them, they didn't farm, but yet 13 they have a hold on Mobile because of 14 reputation throughout the years. 15 Generational friends, generational trust, all 16 that goes a long way. Your name is all you 17 have. And their name has been built up in 18 Mobile as though they are trustworthy. 19 Q. (BY MR. OVERING) Do you think 20 it's fair that people in Pike and Barbour 21 County would have a representative from 22 Mobile with no farming background? 23 MS. RUTAHINDURWA: Object to</p>



<p style="text-align: right;">Page 122</p> <p>1 form.</p> <p>2 A. Sure. It's a democratic process.</p> <p>3 He don't have to have a farming background.</p> <p>4 Their ideas, their thought, if they line</p> <p>5 up -- he did well. Shomari Figures did well</p> <p>6 in those counties. There's some people there</p> <p>7 who can resonate with him. There's some that</p> <p>8 could resonate with my nephew. And so, with</p> <p>9 the democratic process, Shomari Figures won.</p> <p>10 Q. (BY MR. OVERING) Have you ever</p> <p>11 heard of the term "racial appeal" in a</p> <p>12 political campaign?</p> <p>13 A. Yeah.</p> <p>14 Q. What is a racial appeal?</p> <p>15 A. It's something that comes out</p> <p>16 that people like coming from that particular</p> <p>17 person. He's -- they may say he's using the</p> <p>18 race card. And whatever he's using in the</p> <p>19 race card, it appeal to certain voters.</p> <p>20 Q. Right. Do candidates of</p> <p>21 different races use the race card?</p> <p>22 A. Sure. It happen all the time</p> <p>23 throughout. There are people who run for</p>	<p style="text-align: right;">Page 124</p> <p>1 candidate does not have. But I wouldn't use</p> <p>2 the race card against her or race card</p> <p>3 against him. Let the people decide who they</p> <p>4 want, not based on their race.</p> <p>5 Q. Do you think it's irrelevant</p> <p>6 whether she's Black?</p> <p>7 A. I think it's irrelevant with</p> <p>8 everybody. If it's idea -- I think it's</p> <p>9 irrelevant whether she's Black. That doesn't</p> <p>10 matter to me.</p> <p>11 Q. It doesn't matter to you?</p> <p>12 A. No, it doesn't matter what color</p> <p>13 she is as long as she bring the ideas and</p> <p>14 thought that I feel line up with my ideas and</p> <p>15 thoughts.</p> <p>16 Q. Do you think it matters to other</p> <p>17 people you know --</p> <p>18 A. Sure, it does. Sure, it does.</p> <p>19 Q. -- whether she's Black?</p> <p>20 A. Sure, it does. I'm sure they</p> <p>21 want to see the first African-American woman</p> <p>22 become president. That's what they want to</p> <p>23 see. That's what they probably vote for.</p>
<p style="text-align: right;">Page 123</p> <p>1 different political office, they say use the</p> <p>2 race card, and it works for them.</p> <p>3 Q. Do you have an example of using</p> <p>4 the race card?</p> <p>5 A. Let me think using the -- who I</p> <p>6 know used the race card. I think Donald</p> <p>7 Trump uses it sometimes when he says step</p> <p>8 back, stuff like that. That's not bringing</p> <p>9 the country together, in my opinion.</p> <p>10 Q. When he says what?</p> <p>11 A. When he -- when he told this</p> <p>12 particular group, step back, stand up, or</p> <p>13 something of that nature there. I'm sure</p> <p>14 some of you guys know what I'm talking about.</p> <p>15 But anyway, I think when you call</p> <p>16 people out of their names. What is -- what</p> <p>17 is so important about where Kamala -- whether</p> <p>18 she Black, white, or brown? Oh, she</p> <p>19 considers herself Black now. I think that is</p> <p>20 playing the race card. Does she have the</p> <p>21 qualification?</p> <p>22 We can go down the list saying</p> <p>23 what each candidate does not do or each</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. But it doesn't really matter to</p> <p>2 you?</p> <p>3 A. It doesn't matter at all. Even</p> <p>4 if you want to be president, if me and your</p> <p>5 thoughts and ideas line up, then, hey, I'm</p> <p>6 going to support you.</p> <p>7 Q. Maybe they do.</p> <p>8 Do you have any examples of use</p> <p>9 of the race card in a local or state</p> <p>10 election?</p> <p>11 A. Do I know of any examples?</p> <p>12 Q. Yes.</p> <p>13 A. Not race, but I know of some</p> <p>14 other example. You know William Bell that</p> <p>15 ran for mayor one time, right?</p> <p>16 Q. No, I don't.</p> <p>17 A. There was a statement that came</p> <p>18 out about his domestic violence against his</p> <p>19 wife. And so, Cooper used that to try to win</p> <p>20 mayorship, but he did not win because some</p> <p>21 people did not go for that.</p> <p>22 Q. And did you think that was a</p> <p>23 racial --</p>



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1 A. No, no. It's not racial, but  
 2 people do take things that have happened in  
 3 your life and they use it to try to discredit  
 4 you and earn votes from others.  
 5 Q. Do you know if white voters in  
 6 Alabama usually vote for Republicans?  
 7 A. Repeat your question again.  
 8 Q. Do white voters in Alabama  
 9 usually prefer Republicans?  
 10 A. My friend does. My white friend  
 11 does.  
 12 Q. One white friend or --  
 13 A. I have many of them. We agree to  
 14 disagree. But we're still friends. They  
 15 love the Republican idea. Sometime I do.  
 16 Sometime I don't.  
 17 Q. Do you think that's true across  
 18 Alabama?  
 19 A. Definitely. I think so.  
 20 Q. Why do you think so?  
 21 A. If you look at the people who --  
 22 there was a friend of ours -- I don't know.  
 23 THE WITNESS: Y'all know a guy

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1 Frank Farish, right, a white guy, attorney?  
 2 A. So, he made a statement. He  
 3 said -- he said, your nephew should be  
 4 running for governor. He said, he would win  
 5 if he wasn't Black. And so, I looked and I  
 6 thought. I said, what that got to do with  
 7 anything? He said, but he'll never become  
 8 governor just because of him being Black. I  
 9 was like, wow, man, something to think about.  
 10 It seem like sometimes if you're  
 11 a Republican, my own personal opinion, if  
 12 you've got an R by your name, you're  
 13 automatically going to win because we can go  
 14 against that does not have an R by their  
 15 name, my personal opinion, you know, whether  
 16 you're qualified or not.  
 17 Q. So, Republicans --  
 18 A. Vote Republican.  
 19 Q. Right.  
 20 A. Uh-huh.  
 21 Q. Do they sometimes vote for Black  
 22 Republicans?  
 23 A. Do I vote for Black Republicans?

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1 Q. No. Do Republicans sometimes  
 2 vote for Black Republicans?  
 3 A. If their thoughts and ideas line  
 4 up with the Republicans.  
 5 Q. Do Republicans support Justice  
 6 Thomas? You brought him up earlier.  
 7 A. Yeah, I know Justice -- I  
 8 remember when he was -- at his confirmation  
 9 hearing. Sure, they do. You ever know  
 10 Justice Thomas to say no to anything? Do the  
 11 math. And that's nothing personal.  
 12 My brother and I, we talk  
 13 sometimes. I say, hey, man. I said, every  
 14 time something go before Clarence Thomas, you  
 15 can guarantee a vote. You can guarantee it.  
 16 What did the Thurgood Marshall  
 17 say?  
 18 THE WITNESS: Do you all remember  
 19 what he said?  
 20 A. He asked the question -- he  
 21 said -- when they went through the  
 22 confirmation, he said, did you know a brown  
 23 snake bite you and a black snake bite you?

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1 He said, they both hurt. It doesn't matter  
 2 which way the bite come from. What he was  
 3 saying to me and you was that Clarence Thomas  
 4 is no different than anybody else. He's  
 5 going to bite you. And guess what? All the  
 6 number of years he's been on the Supreme  
 7 Court, he's been biting.  
 8 Q. You're saying that because he was  
 9 nominated by a Republican president?  
 10 A. Am I saying the reason why he's  
 11 biting? No, I'm saying that they looked at  
 12 his characteristics from the very beginning.  
 13 They knew. Thurgood Marshall knew. And I  
 14 listened to him, and I see what he was  
 15 saying.  
 16 Affirmative action got you where  
 17 you're at, right? What did Clarence Thomas  
 18 do the first opportunity he had? The  
 19 evidence speak for itself.  
 20 Q. Do you think --  
 21 MS. RUTAHINDURWA: Can we take a  
 22 five-minute break?  
 23 MR. OVERING: Sure.

<p style="text-align: right;">Page 130</p> <p>1 (Whereupon, a brief recess was 2 taken.) 3 4 MR. OVERING: We'll mark this one 5 Exhibit 2. 6 7 (Whereupon, Defendant's Exhibit 2 8 was marked for identification and 9 copy of same is attached hereto.) 10 11 Q. (BY MR. OVERING) This is the 12 2023 map that the legislature passed and the 13 governor signed after the Supreme Court 14 decision. What do you think of that map? 15 A. What I think of this map here? 16 There was some consideration made. What I 17 mean by consideration, a voice being spoken 18 and Supreme Court listened. And they made a 19 decision to make some changes. 20 Q. Have you ever seen that map? 21 A. No. 22 Q. Do you have any opinion on why 23 the legislature drew the map that way?</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Well, how did you come to believe 2 that the state government was being stubborn? 3 A. Well, they was slowful in drawing 4 this map, first of all. It seemed like it 5 wasn't done in a timely fashion. Then, when 6 they did -- when it did come about, there was 7 a question that people wasn't satisfied. 8 Q. Were you satisfied? 9 A. I'll have to learn more about it. 10 I looked at it, but I didn't really focus on 11 it like I should have. 12 Q. Do you know which district you 13 live in on this map? 14 A. Let me look up here. 7. 15 Q. So, your congresswoman will stay 16 the same on this map? 17 A. Absolutely. That is correct. 18 Q. Does it matter to you who the 19 congressman is in District 3? 20 A. District 3? Who is it? Man, if 21 this particular person is elected and the 22 majority people who voted for him feel that 23 he's going to represent their ideas, you</p>
<p style="text-align: right;">Page 131</p> <p>1 A. Well, they was given -- it was 2 given an opportunity to address the 3 complaints -- address the decision the 4 Supreme Court made. And so, this is why this 5 map was drawn. Hopefully, they would be in 6 compliance and the map that was drawn would 7 be accepted with the Supreme Court. 8 Q. Earlier, you said the legislature 9 was stubborn? 10 A. Uh-huh. 11 Q. Is there anything about this map 12 that suggests to you the legislature's 13 stubbornness? 14 A. The thing is, is it -- is it 15 acceptable? That's my question. Is the map 16 acceptable? Even though it was drawn, but 17 there's still some legal challenges, right? 18 Q. Acceptable, what does that mean? 19 A. Acceptable mean that it's okay. 20 I mean, that's what -- you asked me -- what 21 was your question? Repeat your question 22 again. Repeat your question again. Is there 23 anything wrong with this map, right?</p>	<p style="text-align: right;">Page 133</p> <p>1 know, I'm all for that. 2 Q. And you feel the same way about 3 District 2? 4 A. Yeah. If the people elect 5 someone that hear their voices, then, I'm 6 okay with that. 7 Q. Even if it's Caroleene Dobson? 8 A. Even if it's Caroleene Dobson or 9 even yourself. 10 Q. Earlier, I asked you if you'd 11 ever heard the term "compactness". 12 A. Uh-huh. 13 Q. And would you remind me what you 14 said, what is compactness? 15 A. I don't quite remember, but the 16 understanding of compactness, when you're 17 compacting a group of voters in a particular 18 area, kind of like a sardine can. 19 Q. My understanding of compactness 20 is about the shape of the district. 21 A. Uh-huh. 22 Q. You don't want it to be too long 23 and spindly. You want it to be more</p>

<p style="text-align: right;">Page 134</p> <p>1 square --</p> <p>2 A. Uh-huh.</p> <p>3 Q. -- or round.</p> <p>4 Does that make sense to you?</p> <p>5 A. Well, like I say, when you say</p> <p>6 compact, that means that you're grouping a</p> <p>7 bunch of things together. And your</p> <p>8 definition is a little bit different from</p> <p>9 mine's.</p> <p>10 Q. Well, so, let's use this map as</p> <p>11 an example. You see how 6 in the middle --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- is relatively compact compared</p> <p>14 to 4, which is very long?</p> <p>15 A. Yeah. Yeah. Exactly.</p> <p>16 MS. RUTAHINDURWA: Object to</p> <p>17 form.</p> <p>18 Sorry. You can answer.</p> <p>19 Q. (BY MR. OVERING) I'll represent</p> <p>20 that it's true.</p> <p>21 Does it make sense to you that it</p> <p>22 would be better for districts to be more</p> <p>23 compact?</p>	<p style="text-align: right;">Page 136</p> <p>1 fact. I wish they were. I wish they were a</p> <p>2 county over here, a county up there separate.</p> <p>3 But that's not the case.</p> <p>4 Q. Well, in this map, though, we're</p> <p>5 looking at --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- parts of the Black Belt are in</p> <p>8 District 2 and parts of the Black Belt are in</p> <p>9 District 7.</p> <p>10 A. Uh-huh.</p> <p>11 Q. Do you see that?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Is that a problem?</p> <p>14 A. I think equal representation, I</p> <p>15 don't think it should be.</p> <p>16 Q. Have you heard the phrase "an</p> <p>17 equal opportunity to participate in the</p> <p>18 political process"?</p> <p>19 A. Yes, I have heard it.</p> <p>20 Q. What does that mean to you?</p> <p>21 A. Equal opportunity mean just what</p> <p>22 it says. People being treated the same,</p> <p>23 respected the same, and being on one accord</p>
<p style="text-align: right;">Page 135</p> <p>1 MS. RUTAHINDURWA: Object to</p> <p>2 form.</p> <p>3 A. Does it make sense to me? There</p> <p>4 are all different kinds of situations that</p> <p>5 could come out when it's compact. It's kind</p> <p>6 of difficult to say right now.</p> <p>7 Q. (BY MR. OVERING) Do you know</p> <p>8 what contiguity means?</p> <p>9 A. Say it -- repeat the word again.</p> <p>10 Q. Contiguity.</p> <p>11 A. Is it being together?</p> <p>12 Continuity, on one accord.</p> <p>13 Q. Could you define the Black Belt?</p> <p>14 A. A group of counties that, the way</p> <p>15 I look at it, economically depressed where</p> <p>16 education, job opportunity is lacking.</p> <p>17 Q. And is it your view that counties</p> <p>18 meeting that description --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- should be in the same</p> <p>21 district?</p> <p>22 A. I wish they wasn't. I wish -- I</p> <p>23 wish they weren't, but they are. It's just a</p>	<p style="text-align: right;">Page 137</p> <p>1 because of equal opportunity.</p> <p>2 Q. Are there any white people in</p> <p>3 your neighborhood?</p> <p>4 A. Yes.</p> <p>5 Q. Do you think that you and they</p> <p>6 have an equal opportunity?</p> <p>7 A. Yes.</p> <p>8 Q. Are you aware of any</p> <p>9 discriminatory voting laws in Alabama today?</p> <p>10 A. Am I aware? No, I'm not. I'm</p> <p>11 not.</p> <p>12 Q. Do you believe that there was a</p> <p>13 long history of racial discrimination in</p> <p>14 Alabama?</p> <p>15 A. Yes, even unconstitutional.</p> <p>16 Q. What do you mean?</p> <p>17 A. There are things that are</p> <p>18 unconstitutional --</p> <p>19 Q. Like what?</p> <p>20 A. -- that have not been taken out.</p> <p>21 There are things written in the</p> <p>22 Constitution that have not been taken out.</p> <p>23 Q. For example?</p>

<p style="text-align: right;">Page 138</p> <p>1 A. Black and white marriage.</p> <p>2 Q. Could you say that again?</p> <p>3 A. Black and white marriage. There</p> <p>4 are other things in there, too. I can't --</p> <p>5 but I know that was one that stood out that I</p> <p>6 think they brought to the forefront to be</p> <p>7 taken out, but I don't think it's been taken</p> <p>8 out.</p> <p>9 Q. Do you think there's a long</p> <p>10 history of racial discrimination in Alabama</p> <p>11 connected to voting in elections?</p> <p>12 A. Yeah. A long history, yeah.</p> <p>13 Q. Could you provide any examples?</p> <p>14 A. Poll tax. There are many of the</p> <p>15 other things that carry a long history of</p> <p>16 discrimination, ownership of land. Just</p> <p>17 different stuff that came about that has a</p> <p>18 history of looking back on it, you'll see</p> <p>19 different things that have come about during</p> <p>20 those time that have changed. But the</p> <p>21 history speak for itself.</p> <p>22 Q. There's no poll tax today, right?</p> <p>23 A. Right. That is the history.</p>	<p style="text-align: right;">Page 140</p> <p>1 Shield.</p> <p>2 So, I gave one of the supervisors</p> <p>3 my card, insurance card. I gave it to him</p> <p>4 just like this professionally (indicating).</p> <p>5 He threw it back. So, I kind of felt kind</p> <p>6 of, you know, why would he throw it back.</p> <p>7 So, the young lady in HR that was showing --</p> <p>8 taking me around, she said, I don't know</p> <p>9 what's wrong with -- I won't call his name --</p> <p>10 why he threw your insurance card back like</p> <p>11 that. I don't know. I want the job so I can</p> <p>12 support my family.</p> <p>13 So, a week went by, a couple of</p> <p>14 days, a month went by. So, I was wondering</p> <p>15 what happened, why I did not get the job,</p> <p>16 because the guy who recommend me told me how</p> <p>17 the policy worked. But anyway, I got a</p> <p>18 letter verbatim that said, thank you</p> <p>19 interested in employment at Alagasco.</p> <p>20 Unfortunately, we can't hire you for the</p> <p>21 position you applied for. But if we have</p> <p>22 anything that can match your skill and</p> <p>23 ability, we'll keep your resume on file. So,</p>
<p style="text-align: right;">Page 139</p> <p>1 Q. And there's no requirement that</p> <p>2 you own land to vote?</p> <p>3 A. Right.</p> <p>4 Q. Is there anything like that</p> <p>5 today?</p> <p>6 A. No.</p> <p>7 Q. Is there still racial</p> <p>8 discrimination generally in Alabama?</p> <p>9 A. I think so.</p> <p>10 Q. How so?</p> <p>11 A. Jobs.</p> <p>12 Q. Could you give an example?</p> <p>13 A. Myself. I can give you an</p> <p>14 example of myself. I retired from Alagasco</p> <p>15 in 2018. When I went December of '99, I had</p> <p>16 an interview. Most interviews at Alagasco is</p> <p>17 one and done. Remember, we're talking</p> <p>18 Alagasco. It's different now. One and done</p> <p>19 meaning that I came in for the physical</p> <p>20 interview. They asked me for ID. They asked</p> <p>21 me for insurance card, which I provide. My</p> <p>22 wife has Federal Blue Cross/Blue Shield.</p> <p>23 They offer just regular Blue Cross/Blue</p>	<p style="text-align: right;">Page 141</p> <p>1 I'm like, where did that come from? I</p> <p>2 thought I had the job.</p> <p>3 And so, the guy asked me -- he</p> <p>4 said, when do you start? I said -- that was</p> <p>5 a co-worker that recommended me. I said, I</p> <p>6 don't. I said, they didn't -- he said, what</p> <p>7 do you mean you didn't get the job? I said,</p> <p>8 I didn't get the job. He said, go down</p> <p>9 there. So, I'm kind of timid. I said, go</p> <p>10 down there. Man, I don't know if that's a</p> <p>11 good idea. He said, go down there.</p> <p>12 So, about that time, man, I</p> <p>13 prayed about the whole entire situation. So,</p> <p>14 here I am. I go down to the common</p> <p>15 headquarters downtown. And so, the young</p> <p>16 lady who told me I had the job, it seemed</p> <p>17 like her demeanor were different when they</p> <p>18 called my name. So, I said, how are you</p> <p>19 doing, in a professional way. She said, I'm</p> <p>20 doing fine. Because I have a background in</p> <p>21 sales. If I didn't sell, I didn't get paid.</p> <p>22 So, you know I've got to sell to support my</p> <p>23 family.</p>

<p style="text-align: right;">Page 142</p> <p>1 So, she said -- she said -- she</p> <p>2 said, can I help you? I said, what happened?</p> <p>3 Why didn't I get the job? She said, well, we</p> <p>4 thought we had a better candidate. So, I'm</p> <p>5 thinking -- trying to find out with my sales</p> <p>6 experience -- because when you tell me you</p> <p>7 want to come in and work out, what do you</p> <p>8 want to work on now. I'll let you sell</p> <p>9 yourself to me, but I'm going to sell you a</p> <p>10 membership. Does that make any sense?</p> <p>11 But anyway. She said, we found</p> <p>12 another candidate with better qualifications.</p> <p>13 I said, can you explain that to me? She</p> <p>14 said, well, you have a degree. So, I said,</p> <p>15 what a degree got to do with a job? She</p> <p>16 said, then, people like you don't stick</p> <p>17 around long enough. I said, stick around</p> <p>18 long enough? You check my record. I've</p> <p>19 never been fired, I've never been late. Why</p> <p>20 didn't I get the job based on what you found</p> <p>21 out about me? She said, well, you know, we</p> <p>22 just felt like you're not going to stick</p> <p>23 around long enough. So, I'm looking for the</p>	<p style="text-align: right;">Page 144</p> <p>1 there. So, I get down there. Get it -- get</p> <p>2 employed.</p> <p>3 From June 2000 to August of 2008,</p> <p>4 I have made top everything down there. I was</p> <p>5 retired with full honors. I was told that</p> <p>6 anything you or your family need, we'll come</p> <p>7 begging at your door. That's the kind of</p> <p>8 employee I was. You can ask anybody that</p> <p>9 have a upper management position with</p> <p>10 Alagasco, do you know a guy named Bobby</p> <p>11 DuBose, they'll share a story with you.</p> <p>12 I stayed with Alagasco, like,</p> <p>13 thirteen and half months sick. Alagasco did</p> <p>14 not allow me to miss not one paycheck. They</p> <p>15 wanted to know --</p> <p>16 Q. But, initially, you were --</p> <p>17 A. Denied. I was denied. Uh-huh.</p> <p>18 Q. And then, once you worked for the</p> <p>19 company --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- for all those years --</p> <p>22 A. Uh-huh.</p> <p>23 Q. -- did you experience any</p>
<p style="text-align: right;">Page 143</p> <p>1 benefits. I'm looking for retirement. So --</p> <p>2 Q. So, they said it was about you</p> <p>3 having a degree, but you think it was --</p> <p>4 A. Well, I know --</p> <p>5 Q. -- race?</p> <p>6 A. I know what it was. I was told</p> <p>7 what it was. Most of the employees that was</p> <p>8 in the ditch was Black. That guideline was,</p> <p>9 if you didn't have a degree, you can't move</p> <p>10 up the ladder. I know the entire process.</p> <p>11 From December to June, I called</p> <p>12 almost every day. My wife would tell me,</p> <p>13 like, Joe, told her, leave those people</p> <p>14 alone. They ain't going to hire you. Why</p> <p>15 you keep calling them? It didn't matter to</p> <p>16 me. I had nothing to lose. I wanted the job</p> <p>17 to support my family.</p> <p>18 So, when June came around, I'm</p> <p>19 praying about it. I left it all with Him. I</p> <p>20 mean, it was just -- it was a testimony. But</p> <p>21 anyway. When June came around, they called</p> <p>22 me. Mr. DuBose, are you interested in this</p> <p>23 job? I'm saying, how quickly can I get down</p>	<p style="text-align: right;">Page 145</p> <p>1 racial --</p> <p>2 A. I saw the --</p> <p>3 Q. -- discrimination?</p> <p>4 THE COURT REPORTER: I can only</p> <p>5 get one at a time.</p> <p>6 A. I saw the layout. What I mean by</p> <p>7 that, the management from top to bottom. I</p> <p>8 saw how it was designed. I know that there</p> <p>9 were guys who were more qualified to do a</p> <p>10 certain job, but they did not have the</p> <p>11 degree. They were at a lower level paying</p> <p>12 job.</p> <p>13 Q. Because of race?</p> <p>14 A. They did not have the degree.</p> <p>15 That's one of their policy. But when I left,</p> <p>16 there was one of the same guys that was</p> <p>17 Caucasian who got one of those higher paying</p> <p>18 jobs. He said to me -- he said, man, they</p> <p>19 said I'll never get the job because I didn't</p> <p>20 have a college degree. He said, I got it.</p> <p>21 I knew Alagasco policy inside</p> <p>22 out. I learned how they operate. I learned</p> <p>23 how they make decisions. I learned it all.</p>



<p style="text-align: right;">Page 146</p> <p>1 My retirement did not come from 2 the lower level. It came from upper 3 management. 4 Q. Do you think that upper 5 management at the company was racist? 6 A. I knew that some decisions they 7 made was not -- it was not fair. 8 Q. Okay. Have you experienced 9 racial discrimination at other times in your 10 life other than the ones we've talked about? 11 A. I did other job applications, 12 were told things that did not add up to me. 13 You're overqualified. I don't have a job. 14 I've got to pay a bill. Plus, you've got a 15 degree. What does a degree have -- you have 16 to make a decision in paying your bill as a 17 degree with no job, pay a bill, any kind of 18 job with money coming in to support your 19 family. For some reason or another, it was 20 something about a degree that always seemed 21 to intimidate people, some reason. I don't 22 know why. I just don't know. 23 Q. Do you think that there was</p>	<p style="text-align: right;">Page 148</p> <p>1 that racial makeup? 2 A. I'm not going to say any company, 3 but it does exist. It exists whether you 4 want to admit it or not. Things like that 5 exist. 6 Q. Other than employment 7 discrimination, are there other areas of life 8 in which there is racial discrimination today 9 in Alabama? 10 A. Bank, mortgage, mortgage 11 department. 12 Q. Could you explain that? 13 A. Loans application, a higher 14 percentage of African-American loans that are 15 rejected with the same qualification. I 16 don't know if you are aware. There was a 17 big -- a television interview where this guy 18 had an appraisal come in. He had all Black 19 pictures around his wall. He got a way, way 20 less appraisal. When he changed it all out 21 and he put white pictures up there, he got a 22 real, real high appraisal. 23 Q. Was that in Alabama?</p>
<p style="text-align: right;">Page 147</p> <p>1 employment discrimination in Alabama fifty 2 years ago? 3 A. Sure. 4 Q. A hundred years ago? 5 A. Sure. 6 Q. Do you think there's less of it 7 today? 8 A. Disguised in other ways, but it's 9 out there. It's out there. Growing up on a 10 plantation and understanding the -- certain 11 things that is in place, you kind of know how 12 the setup goes. There's a lot of things you 13 learn. 14 Q. Were there any Black men or women 15 in the upper management at Alagasco? 16 A. Not upper. There was some that 17 had been there for thirty, forty years had 18 token position, I would say. 19 Q. Do you think there are a lot of 20 companies that look like that? 21 A. Sure. 22 Q. And does that mean that there's 23 racial discrimination at any company that has</p>	<p style="text-align: right;">Page 149</p> <p>1 A. It was in some other state, but 2 I'm sure Alabama because I think it happened 3 to me. I ain't leaving a house that I paid 4 over -- almost five hundred thousand dollars 5 for. And I was told that it was under 6 appraised, so I didn't get a loan through 7 Wells Fargo. But yet there were other who 8 had -- even my comp didn't compare to Ross 9 Bridge comp. They went with some unknown 10 community and got a lower comp. 11 And also there was a guy who came 12 out to do my appraisal. When I told him 13 Bessemer, guess what he said? You pay me 14 three hundred dollars, I'll be there. Okay. 15 Now, remember, you pay me three -- I said, 16 okay. When he got out of the car, he went to 17 doing his head like that (indicating). But 18 he assumed because I said Bessemer that 19 (indicating) -- those are true facts. 20 Q. Right. But that has to do more 21 with Bessemer than race? 22 A. Well, he assumed Bessemer, then, 23 he assumed that I did not have the money also</p>

<p style="text-align: right;">Page 150</p> <p>1 because of race. Just assumed. A lot of  2 things are assumed. There's no fact behind  3 them, but they're assumed.  4 Q. Do you think that sort of thing,  5 discrimination in loans and mortgages,  6 happens in other parts of the country?  7 A. Sure, it does.  8 Q. Does it happen more in Alabama  9 than in Indiana?  10 A. I can't say, sir.  11 MS. RUTAHINDURWA: Object to  12 form.  13 A. I don't know. I don't know  14 statistically. I don't know.  15 Q. (BY MR. OVERING) Speaking of  16 statistics, do you know the racial  17 demographics of your congressional district?  18 A. No, sir.  19 Q. Employment discrimination, loans.  20 Are there any other areas of racial  21 discrimination today in Alabama?  22 A. Disparity in classroom. School.  23 School in general. Some school have the type</p>	<p style="text-align: right;">Page 152</p> <p>1 also. They're not providing the child with a  2 strong Head Start program. They're not  3 making sure the child gets the adequate  4 information they need to be successful in  5 life.  6 Q. So, the Head Start program is  7 made available, but the parents don't take  8 advantage of it?  9 A. In some cases, they don't. Some,  10 they do; some, they don't.  11 Q. Is it the school boards that are  12 to blame for lack of resources?  13 A. I think it's called prioritizing.  14 I don't think the school board prioritizing  15 what it really needs or what's the most  16 important the student need.  17 Q. Is it the city government that's  18 responsible?  19 A. They can be held accountable,  20 that they're not making sure the kids are  21 getting what they need. It's kind of like a  22 no care attitude. I've got mine. You get  23 yours. But, eventually, it's the child is</p>
<p style="text-align: right;">Page 151</p> <p>1 of equipment or support they need where  2 others don't. Some people -- some school  3 have government assistance, some people  4 don't. Some schools don't.  5 Q. And is that true in Birmingham or  6 in Bessemer?  7 A. I would say Bessemer is almost  8 taken over by the state. Something has gone  9 horribly wrong. Birmingham, I guess their  10 grade may be a C or something. It should be  11 much higher. They're working on it.  12 Q. You're saying the schools with  13 more Black students get fewer resources?  14 A. I would think so because there's  15 so many needs that each school has but don't  16 have them, whether it's through an individual  17 contribution or something, something they  18 don't -- there's a lot of things they're  19 lacking.  20 Q. Who's responsible for that?  21 A. The leadership. They're not  22 providing the type of quality they need.  23 And, ultimately, it falls on the parents,</p>	<p style="text-align: right;">Page 153</p> <p>1 the one that suffer the most because of lack  2 of education.  3 Q. If you were worried about  4 discrimination in education, who in  5 government would you talk to?  6 A. You talk to your state leaders,  7 your governor, those who are in power to make  8 a change. You've got to go beyond the  9 smaller level and to a higher level people  10 who's in authority that can reconcile what  11 you're saying.  12 Q. Is there a racial discrimination  13 in the healthcare and health insurance  14 industries?  15 A. I would say so.  16 Q. Why do you think that?  17 A. Look at the life expectancy.  18 Why? Lack of healthcare? Because -- I'll  19 take my mom for example. I shared with y'all  20 earlier. She didn't have any insurance, not  21 any. Couldn't afford it. Besides the home  22 memory, there was nothing that was available.  23 Sharecropper all her life.</p>

<p style="text-align: right;">Page 154</p> <p>1 Q. Did that have to do with her 2 race? 3 A. Well, she come from a plantation. 4 Most plantations are a farmer. If you're a 5 farmer, it cause people who come at a 6 disadvantage and other people who make 7 decision for them that does not have their 8 best interest at heart. 9 Q. There are poor white people who 10 don't have good health insurance, right? 11 A. But there's an astronomical 12 amount of poor Black people based on the 13 population. We're smaller in population, but 14 we're much larger uninsured. I'm not saying 15 that there's not Caucasian. I'm not saying 16 there's not. But I'm saying with the number 17 of Blacks, the number's greater, higher, 18 based on the population. 19 Q. Do you think that discrimination 20 in the healthcare and health insurance 21 industries has gone down over time? 22 A. Repeat that question again. 23 Q. Has discrimination in healthcare</p>	<p style="text-align: right;">Page 156</p> <p>1 it has. It's not as blatant as it once was. 2 Q. Are there any more educational 3 opportunities for Black Alabamians today 4 than, say, fifty years ago? 5 A. Sure, it is. 6 Q. Is it easier to get a loan for a 7 house for Black Alabamians today than it was 8 fifty years ago? 9 A. I would say so. 10 Q. Is it easier to get a job for 11 Black Alabamians today than fifty years ago? 12 A. I would say so. 13 Q. So, overall, would you say the 14 situation is better for Black Alabamians 15 today? 16 A. Sure. We still have a long way 17 to go. I think it's a little bit better than 18 it was when my forefathers were coming up 19 with no education, sharecroppers. There 20 wasn't much opportunity that exist for them. 21 Numbers just wasn't there. Understanding how 22 important it was -- it is to have an 23 education.</p>
<p style="text-align: right;">Page 155</p> <p>1 and health insurance gone down over time? 2 A. To a small degree. I could speak 3 for myself. 4 Q. Do you think that kind of 5 discrimination exists in other states? 6 A. Sure, its does. 7 Q. Is Alabama worse, in your 8 opinion, when it comes to discrimination in 9 healthcare and health insurance? 10 A. I can't say, sir, because I don't 11 know anything about these other counties or 12 states or cities or -- 13 Q. And what about the schools; do 14 you think the schools are more racially 15 discriminatory in Alabama compared to other 16 states? 17 A. I cannot say. I don't know 18 statistics. I really can't say how Indiana 19 or how California system works. 20 Q. Do you think that the racial 21 discrimination in education has gone down 22 over time in Alabama? 23 A. I would say so somewhat. I think</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. What do you think we need to do 2 overall? 3 A. I think, overall, look at the 4 situation and make an assessment. Once the 5 assessment made, come together and share 6 ideas and concern, and then, we can make a 7 rationale decision what we can do to change 8 it. 9 Q. Is there anything that if you 10 were to testify at trial that you would talk 11 about that we haven't talked about today? 12 A. My upbringing probably. 13 Q. I'm sorry? 14 A. My upbringing. 15 Q. Your upbringing? 16 A. Uh-huh. 17 Q. What would you talk about with 18 respect to your upbringing? 19 A. Just basically born on a 20 plantation, what was important during the 21 time there, and finally moving off at age 22 fifteen but understanding when I came to 23 Birmingham that it was a better opportunity</p>

<p style="text-align: right;">Page 158</p> <p>1 than down in the Black Belt.</p> <p>2 Q. Well, I didn't mean to skip over</p> <p>3 that.</p> <p>4 A. Huh?</p> <p>5 Q. Go ahead.</p> <p>6 A. But I was -- I was just, like,</p> <p>7 bringing up my childhood. It's nothing to</p> <p>8 brag about, just a way of getting to where I</p> <p>9 am now. I was at age fifteen. I don't know.</p> <p>10 Have you heard --</p> <p>11 THE WITNESS: How many of y'all</p> <p>12 are familiar with Bullock County?</p> <p>13 Q. I'm not personally.</p> <p>14 A. You've heard of Sheaha (spelled</p> <p>15 phonetically) Plantations? You know where</p> <p>16 Hurtsboro is? Okay. You know where Midway</p> <p>17 is? Union Spring? So, Midway is down past</p> <p>18 the correctional facility. So, on down</p> <p>19 further, almost in Hurtsboro, way back, maybe</p> <p>20 five miles to uncivilized life, we stayed</p> <p>21 there, sharecroppers. Okay.</p> <p>22 At fifteen, we moved off. Here's</p> <p>23 how we moved off: My dad farmed the land for</p>	<p style="text-align: right;">Page 160</p> <p>1 don't have it. It's spent.</p> <p>2 What we did with the money, we</p> <p>3 bought a Jim Walter home. You know what Jim</p> <p>4 Walter says, a deed is all you need, right?</p> <p>5 So, we bought this particular piece of land.</p> <p>6 So, the master came up. He</p> <p>7 said -- I had two older brothers that was</p> <p>8 working, also, with my dad, with Sheaha</p> <p>9 Plantation. But anyway, he told my dad, I</p> <p>10 came by. You know what I'm here for. My dad</p> <p>11 said, no. He said, what did you do with the</p> <p>12 check? My dad said, I spent it. He said,</p> <p>13 get off my land and I'm going to send your</p> <p>14 two boys home. He said, I'm going to send</p> <p>15 your two boys home this evening. They won't</p> <p>16 have a job. So, my dad was, you know,</p> <p>17 crushed. But anyway, he did not fire my two</p> <p>18 brothers.</p> <p>19 So, what we did with the money,</p> <p>20 we purchased some land. And Jim Walter built</p> <p>21 a frame house. And we moved what was left of</p> <p>22 the equipment, what we had off the land. So,</p> <p>23 I was fifteen years old when all that took</p>
<p style="text-align: right;">Page 159</p> <p>1 many years. And so, this particular time, he</p> <p>2 was working. And this particular thing he</p> <p>3 was doing, we called it burning off. It's</p> <p>4 when you set the old land afire so new growth</p> <p>5 can come. But this particular horse fell</p> <p>6 back on him, crushed his pelvis. He did not</p> <p>7 die, but he was broken pretty seriously.</p> <p>8 And so, what happened that</p> <p>9 particular year we farmed -- all the years</p> <p>10 that we farmed, we were always told that the</p> <p>11 next year would be better. For us, next year</p> <p>12 never came. But somehow or another, the</p> <p>13 Federal Government sent us some form of</p> <p>14 subsidy that we never knew about. But this</p> <p>15 particular time, my dad found out, and he</p> <p>16 received a check.</p> <p>17 So, everybody was told to get off</p> <p>18 the plantation. You've got to go, got to go.</p> <p>19 But my dad got this particular check. And</p> <p>20 the master, I would say, asked for it. And</p> <p>21 my dad said, no, I spent it. So, he had sent</p> <p>22 one of the workers over there to get this</p> <p>23 particular amount of money. My dad said, I</p>	<p style="text-align: right;">Page 161</p> <p>1 place. So, we had this open frame house with</p> <p>2 nothing in it inside. The survivors was the</p> <p>3 last to leave the plantation.</p> <p>4 So, after that, some of us gotten</p> <p>5 older, began to branch out. I, you know,</p> <p>6 went to school, high school, came to</p> <p>7 Birmingham for the first time. But I saw a</p> <p>8 whole other world. What I mean by whole</p> <p>9 other world, I saw opportunity that I didn't</p> <p>10 have. There, you can only get maybe an acre</p> <p>11 of land, whatever, so small, a trailer, an</p> <p>12 old rundown car. That was as far as you can</p> <p>13 go. So, when I came to Birmingham, I saw a</p> <p>14 whole other world, just like letting me see</p> <p>15 some things I never seen before. So, I</p> <p>16 remember coming down I-20/59 going into</p> <p>17 Birmingham, I say, all right. I see this, I</p> <p>18 see that. So, it gave me a notion to know</p> <p>19 that things could be a lot better.</p> <p>20 So, I made -- I came my freshman</p> <p>21 year. Then, I quit. But they allowed me to</p> <p>22 come back during the school term. So, when I</p> <p>23 came back during the school term, I made my</p>

<p style="text-align: right;">Page 162</p> <p>1 mom a promise. I just got emotional. So, I  2 said, if I leave, I'm not coming back the way  3 I left. She said, things will be better for  4 you, the trials and tribulations of  5 everybody's life. So, what I did, I found  6 some people that had a high position that saw  7 something in me. They saw enough in me to  8 give me encouraging word to continue to push  9 forward with my life.</p> <p>10 By that time, I became a father.  11 And I did not want my child to grow up in  12 that situation. So, my wife and my child, my  13 girlfriend at that time, I made provision to  14 prepare. I told my mom and my wife's mom  15 that if you hold on till I get myself  16 established, I will send back, which I did.  17 But in the meantime, I could still see the  18 remnants of the hurt and pain that they did  19 not have health insurance, they did not have  20 transportation. There were so many things  21 they did not have. Remember, this is a  22 plantational life. You did not have  23 everything. You were not allowed to see the</p>	<p style="text-align: right;">Page 164</p> <p>1 speak of. Some of my best friends are guys  2 that -- Caucasian guys that I deal with. As  3 a matter of fact, one of them was calling me  4 while we was here. But I can only stating  5 the fact of my life, what I've experienced.</p> <p>6 Q. Right.</p> <p>7 A. Things that I see may not be as  8 you see them, but these are things that have  9 impact my life.</p> <p>10 Q. Right. Well, race is a big part  11 of what we're talking about.</p> <p>12 A. Exactly.</p> <p>13 Q. Is there anything else that you  14 might talk about at trial from your  15 background or experience of any racial  16 discrimination or experience with voting in  17 elections and politics?</p> <p>18 A. That I can think of right now,  19 because there's so much emotion going through  20 me right now.</p> <p>21 Q. Yeah.</p> <p>22 A. They are emotion of life, things  23 that I've dealt with knowing that even though</p>
<p style="text-align: right;">Page 163</p> <p>1 books. You were allowed to talk about them,  2 but you wasn't allowed to see them.</p> <p>3 So, I remember as a little bitty  4 two or three-year-old being pulled up and  5 down the cotton field in my mom's sack. True  6 fact. And so, I said to myself, there got to  7 be a better way of living. And so, what I  8 did, I made a plan. And I stuck to that  9 plan. There's been some difficult days.  10 There's been some good days. But I stuck to  11 a plan to be able to provide for my family  12 and those who are down in the Black Belt that  13 I can help. I invite them to Birmingham to  14 partake with me whatever I've got, they're  15 welcome to it. I may be here, but my heart  16 and soul is there because I know what they're  17 going through.</p> <p>18 Q. Wow. Is there anything else that  19 you might talk about --</p> <p>20 A. I want to say this -- and I said  21 it to her. She probably don't want me to say  22 it. I don't want you guys to think I'm  23 racist, man. These are just facts that I</p>	<p style="text-align: right;">Page 165</p> <p>1 I'm not there but I am there. There are a  2 lot of things that goes through my mind, a  3 lot of different challenges that comes in and  4 out. I can't think of them right now, but I  5 can't say that I won't be able to. There's a  6 lot of things I could say emotionally that  7 runs through me right now based on the  8 childhood that I've experienced, the way  9 things have turned around with my three  10 daughters. They're educated. One's a  11 federal criminal defense attorney, one's a  12 software engineer. I've got the baby that's  13 in UAB dental school for the summer. Things  14 like that mean a lot to me. But I know for  15 everyone that succeed, there are many more  16 that does not have the opportunity or taking  17 advantage of the opportunity that they have.</p> <p>18 Q. Maybe I asked this. Any of your  19 children ever complain about not being able  20 to vote?</p> <p>21 A. No.</p> <p>22 Q. Or any problems with voter  23 registration or voting?</p>




<p style="text-align: right;">Page 166</p> <p>1 A. No. Texas is fine. They both 2 live in Texas, Dallas and Houston. My 3 youngest daughter, she votes here. She 4 doesn't miss an opportunity to vote. She 5 knows how important it is. Her vote is her 6 voice. 7 Q. Is there anything else you want 8 to say about this case? 9 A. No. Just heart, mind, and soul, 10 just hoping that the best result comes out. 11 See, I can sympathize with those 12 who don't have a voice. I have compassion. 13 I know what it feel like to forty, fifty 14 years that did not amount to anything. Just 15 did not -- it did not work out for a lot of 16 people down there. Still not working out for 17 them. I see a classmate, no retirement, no 18 pension, no health insurance. You know, 19 that's what they -- I'll leave it alone. 20 Q. What kind of representation do 21 they need in Congress? 22 A. Those people down there? Someone 23 who understand their needs, someone who can</p>	<p style="text-align: right;">Page 168</p> <p>1 there's no change have taken place. 2 Now, you don't want to tell 3 everybody to leave. You've only got maybe a 4 quarter acre of land. You've only got this, 5 you've only got, a very small amount. And 6 someone say, where am I going to get it 7 started, what am I going to do to survive. 8 The steel mill back in the day was the place. 9 But, now, you know, there's so many things 10 that are -- that are no longer available. 11 And that comfort zone that life present to a 12 lot of my classmates -- they were smart 13 students in high school, but they took a 14 chance of staying home. But, see, I didn't. 15 They would ask the question, man, how you 16 become this or that and have money and we 17 don't have any? But yet you were a A student 18 and you took a chance to stay here. The 19 opportunity is just not there. 20 Q. Do you think that will change if 21 Shomari Figures were the congressman? 22 A. That's his responsibility to 23 bring some form of economic opportunity</p>
<p style="text-align: right;">Page 167</p> <p>1 stick up and -- yesterday what it was like 2 down there, what it's still like today, how 3 change has never taken place down there. 4 What do they need? Opportunity to -- I had 5 to leave. There was no opportunity for me. 6 And I surely didn't want my child to grow up 7 that way. 8 Q. What kind of opportunities do you 9 think that they need? And we're talking 10 about people back where you're from in the 11 east part of the Black Belt, right? 12 A. They need an educational program, 13 they need an opportunity to be heard, they 14 need more -- they need to be motivated to 15 know that there's a better way. I can talk 16 till I'm blue in the face with some of the 17 ones down there. And you hate to say you've 18 got to get out of here, man, you've got to 19 get out of here, because that's home. People 20 are comfortable in their home. But from the 21 outside looking in, which I grew up in that 22 environment, now I'm coming back to the 23 environment, there's no change have been --</p>	<p style="text-align: right;">Page 169</p> <p>1 there. That's what he needs to -- as Terri 2 Sewell, she's always talking about grants, 3 she's always talking about bringing business 4 in these other counties she represent. But 5 at Bullock, ain't nobody bringing anything 6 down there. 7 I would have stayed if I would 8 have known the prison system that was built 9 back in '82, '83. That was the only 10 opportunity. But, certainly, I worked at 11 Wayne Farms, which was the largest employee 12 there -- employee -- employment down in 13 Bullock County as a young -- I worked there. 14 I've done some things with my hand. I was 15 catching poultry at night. And I -- my first 16 daughter was born. I couldn't. I couldn't. 17 I couldn't. I just couldn't. I just 18 couldn't. That's why I left with her crying, 19 me crying. But I had to go because the 20 opportunity wasn't there. 21 She was three. She said -- she 22 said, Daddy -- I said, baby, what do you want 23 to be when you grow up. She said, Daddy, I</p>

<p style="text-align: right;">Page 170</p> <p>1 want to be an attorney. And I looked around,  2 and I said, what? And she said, I want to be  3 an attorney. And so, I walked away. And I  4 said, she don't know what she's saying.  5 Maybe a teacher or something. See, that was  6 my low expectation.  7 And so, as time passed, I said,  8 baby, what does Daddy's baby want to be? She  9 said, Daddy, I want to be an attorney. Bear  10 in mind, there was no one in my -- in my --  11 in my family went to college, basically, no  12 one had ever finished. And so, these are all  13 thoughts going to my head. She's putting her  14 expectations way too high. But the Spirit  15 told me, don't say anything to her. Don't  16 say a word to her. And I'm still saying,  17 where does she get the idea of wanting to  18 become an attorney.  19 So, as she grew, she networked.  20 She opened the phone book up one day, and she  21 saw this particular lawyer name in the phone  22 book. So, she called. And she asked the  23 lawyer could she -- the lawyer can she shadow</p>	<p style="text-align: right;">Page 172</p> <p>1 she was a secretary, junior secretary. And  2 she would get up there and relentless say  3 stuff. And I would have to go to school so  4 often. She's a smart girl, but that mouth.  5 That mouth. So, I'm trying to control her  6 mouth.  7 This is a true story. She would  8 be like -- she would ask me, Daddy, why, why,  9 why. I said, baby, because I said so. Don't  10 ask so many questions. But I want to know.  11 She was just relentless inside of her. And  12 so, my wife and I, we looked at each other  13 and said, something about this little girl.  14 So, when she went to Samford, I  15 had lost my momma and my dad. And one of the  16 participant judges pulled me to the side. We  17 had just come from my mom or dad's funeral.  18 And she said to me -- she said, you know  19 something about that little girl there. She  20 said, it's just something about her. So,  21 here I am a proud father trying to say, no, a  22 lawyer is just something I don't see in her  23 future.</p>
<p style="text-align: right;">Page 171</p> <p>1 him. I'm at work trying to provide for them.  2 And the lawyer told her, come on, you can  3 shadow me. And from that, she was inspired  4 to participate over at Samford in some mock  5 program that they have. Then, from there,  6 she went to A&amp;M. She got her undergraduate  7 degree in political science. Then, she went  8 to Thomas Cooley School of Law at Michigan  9 State. She left there and got her degree out  10 of Thurgood Marshall down in Houston. And  11 she's been practicing ever since. And we  12 just come out of Aruba this past Sunday.  13 Q. Do you think your kids faced the  14 same kind of racial discrimination that you  15 did or your parents did?  16 A. No. No. I asked my daughter. I  17 said, what problem you ever had? She said,  18 Daddy, they feel intimidated, first of all,  19 because I'm outspoken. There are things that  20 I'm called sometime.  21 But she's a fighter. I don't  22 know. I don't know. Something about her.  23 Even when she was little in Sunday School,</p>	<p style="text-align: right;">Page 173</p> <p>1 And so, she told me -- she said,  2 Dad, I'm going to school. I'm going to be an  3 attorney. And I'm still baffled because, you  4 know, your daughter. And so, she called  5 me -- because I always wanted her to be a  6 teacher. This is a true story. She said,  7 Dad, I passed the bar and I also got hired to  8 teach law. So, here I am. Now, I can't say  9 a word. Because here I am telling her not to  10 be an attorney, to be a teacher. She said,  11 you got your wish and I got mine, too.  12 So, when we go on these trips,  13 she said, Dad, you and Mom come on. All of  14 it's been paid for.  15 And my second daughter, she will  16 get -- she will draw. And I'm like, what are  17 you doing? So, she's a software engineer, a  18 senior software engineer with AT&amp;T. So, my  19 wife knew something about her was special,  20 but we didn't know that she was into  21 engineering like that. So, she got her  22 master and she got that job at AT&amp;T. They  23 have elevated her.</p>

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1 Q. Well, congratulations. It sounds  
2 like --  
3 A. I've still got another one.  
4 Q. -- they've had a lot of  
5 opportunity.  
6 A. I've still got another one.  
7 MR. OVERING: Well, I think we  
8 might leave the next one for another day  
9 unless you guys have any other questions.  
10 MR. TAUNTON: No questions for  
11 me. Thank you, Mr. DuBose.  
12 THE WITNESS: You all are  
13 welcome.  
14 MR. OVERING: Nice to meet you.  
15 Thank very much.  
16 MS. RUTAHINDURWA: I don't have  
17 any questions.  
18 FURTHER DEPONENT SAITH NOT.  
19  
20  
21  
22  
23

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1 C E R T I F I C A T E  
2  
3 S T A T E O F A L A B A M A )  
4 J E F F E R S O N C O U N T Y )  
5 I hereby certify that the above  
6 and foregoing deposition was taken down by me  
7 in stenotype, and the questions and answers  
8 thereto were transcribed by means of  
9 computer-aided transcription, and that the  
10 foregoing represents a true and correct  
11 transcript of the testimony given by said  
12 witness upon said hearing.  
13 I further certify that I am  
14 neither of counsel, nor of kin to the parties  
15 to the action, nor am I an anywise interested  
16 in the result of said cause.  
17  
18   
19 MICHELLE L. PARVIN  
20 Certified Court Reporter  
21 License Number 126  
22 Commission expires 9/30/24  
23 Notary Public expires 1/26/26

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1 Bobby Lee DuBose c/o  
2 Makeba Rutahindurwa, Esquire  
3 mrutahindurwa@elias.law  
4 August 21, 2024  
5 RE: Singleton, Bobby, Et Al. v. Allen, Wes, Et Al.  
6 8/7/2024, Bobby Lee DuBose (#6811187)  
7 The above-referenced transcript is available for  
8 review.  
9 Within the applicable timeframe, the witness should  
10 read the testimony to verify its accuracy. If there are  
11 any changes, the witness should note those with the  
12 reason, on the attached Errata Sheet.  
13 The witness should sign the Acknowledgment of  
14 Deponent and Errata and return to the deposing attorney.  
15 Copies should be sent to all counsel, and to Veritext at  
16 litsup-ga@veritext.com  
17 Return completed errata within 30 days from  
18 receipt of testimony.  
19 If the witness fails to do so within the time  
20 allotted, the transcript may be used as if signed.  
21  
22 Yours,  
23 Veritext Legal Solutions  
24  
25

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1 Singleton, Bobby, Et Al. v. Allen, Wes, Et Al.  
2 Bobby Lee DuBose (#6811187)  
3 E R R A T A S H E E T  
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5 \_\_\_\_\_  
6 REASON\_\_\_\_\_  
7 PAGE\_\_\_\_ LINE\_\_\_\_ CHANGE\_\_\_\_\_  
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9 REASON\_\_\_\_\_  
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22 \_\_\_\_\_  
23 \_\_\_\_\_  
24 Bobby Lee DuBose Date  
25

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1 Singleton, Bobby, Et Al. v. Allen, Wes, Et Al.

2 Bobby Lee DuBose (#6811187)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Bobby Lee DuBose, 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 Bobby Lee DuBose Date

13 \*If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

16

17

18

19 \_\_\_\_\_  
NOTARY PUBLIC

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## [&amp; - administration]

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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.

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