

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 Ms. Messick 9
5 vs.	5
6 WES ALLEN, in his official	6 DEFENDANT'S EXHIBITS:
7 capacity as Alabama	7 Exhibit 1 48
8 Secretary of State, et al.,	8 Complaint For Declaratory and
9 Defendants.	9 Injunctive Relief
10 S T I P U L A T I O N	10 Exhibit 2 49
11 IT IS STIPULATED AND AGREED,	11 First Amended Complaint For Declaratory
12 by and between the parties through their	12 and Injunctive Relief
13 respective counsel, that the deposition of	13 Exhibit 3 64
14 RONALD SMITH may be taken before Michelle L.	14 Map of counties in Alabama
15 Parvin, Commissioner, at the Alabama Attorney	15 Exhibit 4 72
16 General's Office, 501 Washington Avenue,	16 2021 Plan (Legislative)
17 Montgomery, Alabama, 36104, on the 23rd day	17 Exhibit 5 77
18 of July, 2024.	18 VRA Plaintiffs Remedial Map
19 IT IS FURTHER STIPULATED AND	19 Exhibit 6 81
20 AGREED that it shall not be necessary for any	20 2023 Plan (Legislative)
21 objections to be made by counsel to any	21 Exhibit 7 96
22 questions, except as to form or leading	22 Injunction, Order and Court-Ordered
23 questions, and that counsel for the parties	23 Remedial Map
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. Jyoti 16 Jasrasaria, 250 Massachusetts Avenue NW, 17 Suite 400, Washington, DC, 20001, appearing 18 on behalf of the Plaintiffs. 19 PENN & SEABORN by Mr. Myron Penn, 20 1971 Berry Chase Place, Montgomery, Alabama, 21 36117, appearing on behalf of the Plaintiffs. 22 JAMES BLACKSHER, Attorney at Law, 23 300 21st Street North, Birmingham, 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 501 8 Washington Avenue, Montgomery, Alabama, 9 36104, beginning at 9:07 a.m., RONALD SMITH, 10 witness in the above cause, for oral 11 examination, whereupon the following 12 proceedings were had: 13 14 RONALD SMITH, 15 being first duly sworn, was examined and 16 testified as follows: 17 18 THE COURT REPORTER: Okay. Usual 19 stipulations? 20 MS. MESSICK: Yes, please. 21 Are you agreeable to the usual 22 stipulations? 23 MS. JASRASARIA: Yes.</p>
<p style="text-align: right;">Page 7</p> <p>1 35203, appearing on behalf of the Plaintiffs. 2 LEGAL DEFENSE FUND, (LDF), by Ms. 3 Kathryn Sadasivan, 40 Rector Street, 5th 4 Floor, New York, New York, 10006, appearing 5 on behalf of the Plaintiffs. 6 OFFICE OF THE ATTORNEY GENERAL, 7 STATE OF ALABAMA by Ms. Misty S. Fairbanks, 8 and Mr. Richard D. Mink, 501 Washington 9 Avenue, Montgomery, Alabama, 36104, appearing 10 on behalf of Defendant Secretary Wes Allen. 11 BALCH & BINGHAM, LLP, by Mr. 12 Dorman Walker, 445 Dexter Avenue, Montgomery, 13 Alabama, 36101, appearing on behalf of 14 Defendants Senator Livingston and 15 Representative Pringle. 16 17 Also Present: 18 Natalie Walls 19 Matthew Peiloff 20 Matthew Abbott 21 22 23</p>	<p style="text-align: right;">Page 9</p> <p>1 MS. MESSICK: Dorman, that's fine 2 with you? 3 MR. WALKER: Read and sign, 4 please. 5 MS. MESSICK: Is that okay? 6 MR. WALKER: Yeah, usual 7 stipulations. 8 MS. JASRASARIA: Read and sign is 9 fine. 10 MS. MESSICK: And I was going to 11 ask if you want to read and sign. 12 MS. JASRASARIA: Yes. 13 14 EXAMINATION BY MS. MESSICK: 15 16 Q. Okay. Good morning. My name is 17 Misty S. Fairbanks Messick, and I represent 18 the Alabama Secretary of State, Wes Allen, in 19 the congressional redistricting lawsuit that 20 you have filed. This deposition is an 21 opportunity for us to understand your 22 testimony in this matter. I'll be asking you 23 questions, which you will be answering under</p>

<p style="text-align: right;">Page 10</p> <p>1 oath. Do you understand that?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Okay. Great. This conversation</p> <p>4 has different rules than a normal</p> <p>5 conversation. We do have a court reporter</p> <p>6 here who is taking down everything that we</p> <p>7 say. In order for her to do that and to do</p> <p>8 that accurately, it is important that we not</p> <p>9 speak over each other. That's really easy to</p> <p>10 do in normal conversation. But today, I'm</p> <p>11 going to try real hard to wait for you to</p> <p>12 finish answering a question before I speak,</p> <p>13 and I'll ask you to wait until I finish</p> <p>14 asking the question before you start</p> <p>15 answering.</p> <p>16 It's also important today -- it</p> <p>17 is fine for you to nod your head, but you</p> <p>18 must also speak orally to help make sure that</p> <p>19 she gets your responses down. Will you do</p> <p>20 that for me?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay. Thank you. If you -- if I</p> <p>23 ask you a question that you don't understand,</p>	<p style="text-align: right;">Page 12</p> <p>1 A. That's fine.</p> <p>2 Q. Your counsel may object from time</p> <p>3 to time. Most of the time, that is an</p> <p>4 objection to the form of the question. And</p> <p>5 that's just her telling me that she doesn't</p> <p>6 like something about the way I asked the</p> <p>7 question. But when she objects to the form,</p> <p>8 you still answer. There may be objections</p> <p>9 where she doesn't want you to answer a</p> <p>10 question or would advise you against</p> <p>11 answering.</p> <p>12 A. Uh-huh.</p> <p>13 Q. In that case, she'll make it</p> <p>14 clear to you.</p> <p>15 We will occasionally take breaks.</p> <p>16 If you need a break and I haven't called for</p> <p>17 one, you can let me know, and I'll be happy</p> <p>18 to take one pretty quickly. There is one</p> <p>19 rule about breaks, though, and that is, you</p> <p>20 can't take one when I've asked you a question</p> <p>21 until you've answered it. So, you answer the</p> <p>22 question, and then, we'll take a break as</p> <p>23 quickly as we can.</p>
<p style="text-align: right;">Page 11</p> <p>1 please ask me, let me know. I can rephrase</p> <p>2 it or ask it again.</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. And if you don't hear anything</p> <p>5 that I ask, you can -- I can repeat it for</p> <p>6 you or the court reporter can read it back.</p> <p>7 I want to make sure you understand the</p> <p>8 question before you answer, okay?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Sometimes a witness will give an</p> <p>11 answer during the course of a deposition, and</p> <p>12 later on, they'll realize that that answer</p> <p>13 wasn't complete or they misspoke or there's</p> <p>14 just something that they want to change. If</p> <p>15 at any point while you're still here today</p> <p>16 you think of something you want to change,</p> <p>17 any question you want to go back to, you can</p> <p>18 always let me know or let your counsel know,</p> <p>19 and we'll go back and let you make whatever</p> <p>20 additional statements you want to make so</p> <p>21 that when you leave here today, we have your</p> <p>22 complete and full testimony to the best of</p> <p>23 your ability today.</p>	<p style="text-align: right;">Page 13</p> <p>1 Is there any reason, including</p> <p>2 medications or medical conditions, that you</p> <p>3 can't testify today truthfully and</p> <p>4 completely?</p> <p>5 A. I can't think of anything.</p> <p>6 Q. Okay. Thank you. Do you have</p> <p>7 any questions about this process before we</p> <p>8 start?</p> <p>9 A. Just wish you had a bottle of</p> <p>10 water.</p> <p>11 MS. MESSICK: Let's take a</p> <p>12 three-minute break.</p> <p>13</p> <p>14 (Whereupon, a discussion was held</p> <p>15 off the record.)</p> <p>16</p> <p>17 Q. (BY MS. MESSICK) Sir, would you</p> <p>18 please state your name for the record?</p> <p>19 A. Ronald W. Smith.</p> <p>20 Q. Thank you. Have you ever been</p> <p>21 involved in litigation before this case?</p> <p>22 A. Yes, I have.</p> <p>23 Q. How many prior cases?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. I think, two. I was involved in 2 an automotive accident. 3 Q. And what's the other one? 4 A. Another auto accident. 5 Q. Okay. The car accident that you 6 thought about first, when approximately was 7 that? 8 A. Oh, they've been over ten years 9 ago. 10 Q. Both of them have been? 11 A. Yes, ma'am. 12 Q. In the first one, are you the 13 person who sued or the person who was sued? 14 A. I was the person that did the 15 suing on both. 16 Q. Okay. Did you sit for a 17 deposition in either one of those cases? 18 A. I'm trying to remember now. I 19 think -- I think we just went straight to an 20 arbitrator. 21 Q. Okay. 22 A. We did do a deposition, and then, 23 we went to an arbitrator.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Sorry about that. 2 Did you -- I'm not asking you 3 about what you talked about, but did you talk 4 to your lawyers in preparation for this 5 deposition? 6 A. Yes. 7 Q. And in the conversations with 8 your lawyers, was there anybody present 9 besides you and your lawyers? 10 A. No, ma'am. 11 Q. Have you talked to anyone other 12 than your lawyers about this deposition? 13 A. My wife and kids. 14 Q. Okay. What did you tell your 15 wife and kids about the deposition? 16 A. I just told them it was -- not so 17 much about the deposition, about that I 18 got -- I had the opportunity to come to 19 Montgomery for this historic event. And they 20 was elated and -- 21 Q. Okay. 22 A. -- basically. 23 Q. Did you look at any maps in</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Okay. Have you -- did you do a 2 deposition on one of those cases or both of 3 them? 4 A. On both. 5 Q. Okay. How long did those -- how 6 long did each deposition last? 7 A. Maybe an hour. 8 Q. Okay. And were those cases 9 resolved in arbitration? 10 A. Yes, ma'am. 11 Q. Okay. Have you ever testified in 12 court before? 13 A. No, ma'am, I haven't. 14 Q. Okay. Have you ever testified 15 under oath in some sort of different setting 16 other than a deposition or in the court? 17 A. I can't recall that. 18 Q. Okay. What did you do to prepare 19 for your deposition today? 20 A. Just refreshed the reasons why 21 I'm here -- 22 Q. Okay. 23 A. -- and got up earlier.</p>	<p style="text-align: right;">Page 17</p> <p>1 preparation for this deposition? 2 A. Sometime back. Uh-huh. 3 Q. Do you remember which maps you 4 looked at? 5 A. I can't recall because I think it 6 was two of them. And I looked at both of 7 them. Uh-huh. 8 Q. Did you -- did you look at any 9 other documents in preparation for this 10 deposition? 11 A. Can you expound on that just a 12 little bit more? 13 Q. There are a number of documents 14 associated with this lawsuit, including, for 15 instance, the complaint or different court 16 orders, and then, of course, there are also 17 the maps. And there are all kinds of briefs 18 and motions. And so, I'm just -- and there 19 are expert reports. I'm wondering if there 20 are any documents at all that you can think 21 of as you sit here today that you looked at 22 in preparation for this deposition? 23 A. I think I saw something, like, on</p>

<p style="text-align: right;">Page 18</p> <p>1 television, you know, all the media, just 2 reading over something -- looking at some of 3 those if that counts. 4 Q. Okay. When you say on 5 television, are you talking about news 6 reports or are you also including things like 7 looking on the internet? 8 A. Internet, basically. 9 Q. Okay. What year were you born? 10 A. Ma'am? 11 Q. What year were you born? 12 A. 1954. 13 Q. And what is your address? 14 A. 706 Pittman Drive. 15 Q. In what city? 16 A. Union Springs. 17 Q. And that's in Bullock County? 18 A. Yes, ma'am. 19 Q. Do you have any other residential 20 addresses right now? 21 A. No, ma'am. 22 Q. Okay. How long have you lived at 23 706 Pittman Drive in Union Springs, Alabama?</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. And how long did you stay? 2 A. I split time. The first time, I 3 was two years. 4 Q. Okay. 5 A. And then, the next time, I did 6 six years. 7 Q. When did you start the six-year 8 stint? 9 A. '79. '79 or '80. Golly. Ooh, 10 I'm getting old. 11 Q. Okay. What did you do in the 12 Army? 13 A. I was a -- first was a patient 14 administrator. 15 Q. A patient administrator? 16 A. Administrator. Uh-huh. 17 Q. What does that mean? 18 A. You work for the -- I worked for 19 Brooke Army Medical Center. And in that, you 20 have all the administrative duties of a 21 hospital from admission to disposition. 22 Q. Okay. I'm a navy family, but I 23 have, like, a -- my mother's cousin went into</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Between -- oh, my wife is going 2 to get upset. I think it was thirty to 3 thirty-two years. Been between that. I'd be 4 about right. I'd be okay. 5 Q. Okay. Where were you raised? 6 A. Bullock County. 7 Q. Okay. 8 A. Uh-huh. 9 Q. Were you born there? 10 A. Yes, ma'am. 11 Q. Okay. Have you ever lived 12 anywhere in Alabama other than Bullock 13 County? 14 A. Never lived anywhere in Alabama, 15 no. 16 Q. Okay. Have you ever lived 17 anywhere other than Bullock County? 18 A. Yes, I have. 19 Q. Okay. So, where else have you 20 lived? 21 A. I was in the United States Army. 22 Q. Okay. When were you in the Army? 23 A. I went in in 1974.</p>	<p style="text-align: right;">Page 21</p> <p>1 the Army for the medical program. 2 That second stint, were you in 3 patient administration again or did you do 4 something different? 5 A. I had to come back in another 6 field because that field was crowded. 7 Q. Okay. 8 A. I went in as a power generator 9 wheel vehicle mechanic. And I can't repair a 10 truck or nothing. 11 Q. When you were in the Army between 12 about 1974 and 1976, where did you live? 13 A. In San Antonio. 14 Q. That entire time? 15 A. Yes, ma'am. 16 Q. Okay. And when you were in for 17 those six years starting in approximately 18 1979 or 1980, where did you live? 19 A. Oh, various places. 20 Q. Okay. Which ones do you 21 remember? 22 A. When I went back in, I had to -- 23 the training was at Fort Dix, New Jersey;</p>

<p style="text-align: right;">Page 22</p> <p>1 then, Fort -- Lawton, Oklahoma. I can't 2 think of the name. Huh. Lawton, Oklahoma. 3 And then, to Germany back to Oklahoma, to 4 Korea, back to Oklahoma, and discharged. 5 Q. And between your two stints in 6 the Army, were you back in Bullock County? 7 A. On leave. Is that what you're 8 saying, on leave? 9 Q. Between 1976 when you got out of 10 the Army the first time? 11 A. No, I remained -- okay. 12 Q. I'm sorry. 13 A. Okay. I'm sorry for you. I 14 interrupted you. I apologize. 15 Q. No problem. Between that first 16 two-year stint in the Army -- 17 A. Uh-huh. 18 Q. -- and the second two-year stint 19 in the Army, were you back in Bullock County 20 or were you somewhere else? 21 A. Oh. Are you saying -- correct me 22 if I'm wrong -- when I was discharged in 23 1996, did I move back to Bullock County; is</p>	<p style="text-align: right;">Page 24</p> <p>1 Springs High, which is now Bullock County 2 High. 3 Q. Okay. And you graduated in 1973? 4 A. There you -- that's right. 5 Q. Okay. And did you ever attend 6 college? 7 A. Yes, ma'am. 8 Q. Okay. What college did you -- 9 what is the first college you attended? 10 A. St. Philip's Junior College in 11 San Antonio. 12 Q. St. Philip Junior College? 13 A. Yes, ma'am. 14 Q. And when were you enrolled there, 15 approximately? 16 A. When I -- when I first discharged 17 out of the Army in '76. 18 Q. Did you graduate from -- 19 A. No, ma'am. 20 Q. Okay. How long were you enrolled 21 at St. Philip Junior College? 22 A. A little over a year. 23 Q. What were you studying?</p>
<p style="text-align: right;">Page 23</p> <p>1 that what I'm understanding? 2 Q. Except I think you said '96. So, 3 I thought we were on '76. 4 A. '76? 5 Q. Yes. In 1976, where did you go 6 after -- 7 A. Oh, I stayed -- 8 Q. -- you were discharged? 9 A. -- in San Antonio. 10 Q. Okay. How long were you in San 11 Antonio? 12 A. Until I reentered the military. 13 Q. Have you lived anywhere else that 14 we haven't already talked about today? 15 A. No. 16 Q. Did you go into the Army right 17 after high school? 18 A. Well, I went in. I finished high 19 school in May, and I joined the Army in that 20 January, the following January. 21 Q. Okay. Which high school did you 22 attend? 23 A. At that time, it was Union</p>	<p style="text-align: right;">Page 25</p> <p>1 A. Marketing and management. 2 Q. Did you ever enroll in another 3 college after that? 4 A. Several. 5 Q. Okay. Let's do the next one. 6 A. I went to Cameron University in 7 Oklahoma while in the military in Oklahoma. 8 Q. Okay. Did you get a degree 9 there? 10 A. No, ma'am. 11 Q. How -- 12 A. I transferred. 13 Q. I'm sorry. How long did you stay 14 at Cameron -- 15 A. One -- 16 Q. -- University? 17 A. -- semester. 18 Q. And what's the next college or 19 university you attended? 20 A. University of Maryland Europe 21 while in the military. 22 Q. You said University of Maryland 23 Europe?</p>

<p style="text-align: right;">Page 26</p> <p>1 A. Right.</p> <p>2 Q. So, did they have a campus there</p> <p>3 or was that --</p> <p>4 A. Right.</p> <p>5 Q. I don't think we did online then.</p> <p>6 A. Well, University of Maryland,</p> <p>7 United States Department Defense --</p> <p>8 Department of Defense has a contract with</p> <p>9 several universities. Like the University of</p> <p>10 Maryland, they call it University of Maryland</p> <p>11 Europe. Troy State University now have</p> <p>12 contracts where they're in different military</p> <p>13 installations.</p> <p>14 Q. Okay. I knew Troy --</p> <p>15 A. Uh-huh.</p> <p>16 Q. -- was worldwide.</p> <p>17 I didn't know about Maryland.</p> <p>18 A. Yeah, Maryland was years ago.</p> <p>19 Q. How long did you attend college</p> <p>20 at the University of Maryland Europe?</p> <p>21 A. I attended probably a semester,</p> <p>22 but military training interrupted.</p> <p>23 Q. Okay. Did you attend any other</p>	<p style="text-align: right;">Page 28</p> <p>1 A. -- I'm a few hours short.</p> <p>2 Q. Okay. What kind of training did</p> <p>3 you get in the military?</p> <p>4 A. Oh, extensive. Mostly</p> <p>5 administrative. Initially was -- you had to</p> <p>6 do clerk typing as a prerequisite to go into</p> <p>7 patient administration or medical records</p> <p>8 specialist. That's what it's called, medical</p> <p>9 records specialist. After that, you had to</p> <p>10 go to -- once you got to an E-5 or a</p> <p>11 sergeant, you had to go to a lot of</p> <p>12 leadership classes. So, you had to go to</p> <p>13 your basic NCO training. Then, you had to go</p> <p>14 to your primary NCO training. And then -- we</p> <p>15 have so many classes that -- because, like, I</p> <p>16 had to go to EEOC classes because I was an</p> <p>17 EEOC officer in the NCO. Urinalysis</p> <p>18 training. I mean, I could -- and it goes --</p> <p>19 it would be too many to even consider</p> <p>20 listing.</p> <p>21 Q. Okay. And when you said NCO,</p> <p>22 that's noncommissioned officer?</p> <p>23 A. That's right.</p>
<p style="text-align: right;">Page 27</p> <p>1 colleges or universities?</p> <p>2 A. When I came back to Union Springs</p> <p>3 in 1986, I enrolled at Auburn University</p> <p>4 Montgomery, however, I didn't finish.</p> <p>5 Q. Okay. What were you studying</p> <p>6 there?</p> <p>7 A. Continuing with marketing and</p> <p>8 management.</p> <p>9 Q. How long were you enrolled at</p> <p>10 Alabama -- at the Auburn University</p> <p>11 Montgomery?</p> <p>12 A. About two semesters.</p> <p>13 Q. Okay. Were you ever enrolled in</p> <p>14 any other colleges or universities?</p> <p>15 A. I think that's just about enough.</p> <p>16 Q. Okay. And it sounds like the</p> <p>17 military kept you moving --</p> <p>18 A. Yes.</p> <p>19 Q. -- and I imagine family, too.</p> <p>20 So, did you ever get a college</p> <p>21 degree?</p> <p>22 A. No, ma'am --</p> <p>23 Q. Okay.</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Okay. And then, it sounded like</p> <p>2 you said EEOC. That's the Equal</p> <p>3 Employment --</p> <p>4 A. Right.</p> <p>5 Q. -- Opportunity Commission?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Did they teach you how to be a</p> <p>8 mechanic?</p> <p>9 A. Well, I wished they had.</p> <p>10 Q. Okay.</p> <p>11 A. I wouldn't be broke today.</p> <p>12 Q. All right. What is your wife's</p> <p>13 name?</p> <p>14 A. Juanita, J-u-a-n-i-t-a.</p> <p>15 Q. And her last name is Smith?</p> <p>16 A. Yes.</p> <p>17 Q. And is she the only woman you've</p> <p>18 ever been married to?</p> <p>19 A. No, ma'am, I was married before.</p> <p>20 Q. Okay. How long have you been</p> <p>21 married to Juanita?</p> <p>22 A. That's the trick. Is it</p> <p>23 thirty-one or thirty-two years?</p>

<p style="text-align: right;">Page 30</p> <p>1 Q. Oh, that's why it matters about 2 the house? 3 A. Right. 4 Q. Okay. Okay. How many children 5 do you have? 6 A. She and I -- I have a merged 7 family of three. 8 Q. And do you have any children not 9 with her? 10 A. Yes. 11 Q. Okay. So, in addition to the 12 three that you and Juanita share, how many 13 more do you have? 14 A. One. 15 Q. Okay. Are all those children 16 adults? 17 A. Yeah. Uh-huh. 18 Q. Do any of them live in Alabama? 19 A. Yes, ma'am. 20 Q. Do all of them live in Alabama? 21 A. Yes, ma'am. 22 Q. Okay. Can you tell me which 23 county each one lives in?</p>	<p style="text-align: right;">Page 32</p> <p>1 twice, two term. 2 Q. Okay. 3 A. And when the Bullock County 4 Commission chairman was elected to state 5 senator, the governor appointed me to fill 6 his remaining term. So, I served as chairman 7 of the County Commission. 8 Q. Were you elected to your own term 9 after that? 10 A. Ma'am? 11 Q. After your appointed term 12 ended -- 13 A. Right. 14 Q. -- did you stand for reelection? 15 A. Yes, ma'am. I ran and -- ran and 16 ran and ran and won and won and won. A total 17 of seventeen years. And I didn't finish my 18 last term because of my health. So, that's 19 the reason I had to medically retire. 20 Q. Is it seventeen years on the 21 Bullock County Commission or does that 22 include -- the seventeen years include the 23 city council time?</p>
<p style="text-align: right;">Page 31</p> <p>1 A. My two daughters live in St. 2 Clair County. 3 Q. Okay. 4 A. One son live in Prattville and 5 one son live in Macon County. 6 Q. Do you have any adult 7 grandchildren? 8 A. No, ma'am. No, ma'am. 9 Q. Okay. How are you currently 10 employed? 11 A. I'm very retired. 12 Q. Okay. You know, that doesn't 13 stick for some people, but it sounds like it 14 did for you. 15 A. It's overrated. 16 Q. What did you do before you were 17 retired? What was your most recent 18 employment? 19 A. After the military and college, 20 then, I was hired as a medical administrator 21 for the VA Medical Center in Tuskegee. While 22 serving as a medical administrator for the 23 VA, I was a city councilman in Union Springs</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Seventeen years with Bullock 2 County Commission. 3 Q. Okay. How long were you at the 4 VA in Tuskegee? 5 A. It was over ten years. Let's say 6 eleven or twelve. And I don't want to be 7 held to the fire but in or around eleven or 8 twelve years. 9 Q. You served on the city council 10 while you worked at the VA in Tuskegee? 11 A. Yes, ma'am. 12 Q. When you went on the Bullock 13 County Commission, did you also have another 14 job? 15 A. No, because I had to -- when 16 you -- you can work at another job with 17 municipalities because it's a nonpartisan 18 position. 19 Q. Okay. 20 A. But when you come to the county 21 commission, because of the Hatch Act, you 22 can't work for a federal employer. 23 Q. Okay. So, you wouldn't have been</p>

<p style="text-align: right;">Page 34</p> <p>1 able to continue working at the VA. Did you</p> <p>2 do any other jobs while you were on the --</p> <p>3 serving on the county --</p> <p>4 A. Oh, I sold a lot of cars. I</p> <p>5 worked at a car dealership.</p> <p>6 Q. Okay. Okay. Did you do any</p> <p>7 other jobs in the last thirty years?</p> <p>8 A. I bartended at my father's</p> <p>9 nightclub, which I didn't get paid.</p> <p>10 Q. Okay.</p> <p>11 A. So, yeah, I worked.</p> <p>12 Q. Did you sell cars at one place or</p> <p>13 multiple places?</p> <p>14 A. For one company.</p> <p>15 Q. Okay. Was that in Bullock</p> <p>16 County?</p> <p>17 A. No, it was in Macon County and in</p> <p>18 Montgomery County.</p> <p>19 Q. And your father's club, is that</p> <p>20 in Bullock County?</p> <p>21 A. It was.</p> <p>22 Q. Okay. Are you currently a member</p> <p>23 of any professional organizations?</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Have you worked at any other</p> <p>2 churches?</p> <p>3 A. I have filled in several churches</p> <p>4 when they need a pastor or a leader for that</p> <p>5 day or a leader for that month until they</p> <p>6 call a pastor.</p> <p>7 Q. Okay.</p> <p>8 A. I wasn't called to pastor. I was</p> <p>9 just called to preach. A preacher is</p> <p>10 serious.</p> <p>11 Q. Okay.</p> <p>12 A. A pastor is dangerous.</p> <p>13 Q. Okay. Separate from temporary</p> <p>14 positions, have you been associated with a</p> <p>15 church in a -- as an ordained minister --</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. -- other than the Mt. Silla</p> <p>18 Missionary Baptist Church?</p> <p>19 A. Yes, I've -- I worked for eight</p> <p>20 months at another church when -- during the</p> <p>21 interim of them receiving a pastor. It was</p> <p>22 called Caring For Gospel.</p> <p>23 Q. Where is that at?</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Which ones?</p> <p>3 A. I'm an ordained minister.</p> <p>4 Q. Okay. How does one become an</p> <p>5 ordained minister?</p> <p>6 A. You have to attend school.</p> <p>7 First, you have to be -- you have to accept</p> <p>8 the calling from the Almighty God. Then, you</p> <p>9 attend school. And the district that my</p> <p>10 church belong to, you have to go in front of</p> <p>11 a panel of ministers and pastors, and you're</p> <p>12 asked questions. Then, you do your initial</p> <p>13 sermon. They evaluate it. And then, they</p> <p>14 come back and give you your certificate of</p> <p>15 ordination.</p> <p>16 Q. Okay. Do you currently lead a</p> <p>17 church?</p> <p>18 A. No, I'm on staff.</p> <p>19 Q. Okay. Where at?</p> <p>20 A. Union Springs.</p> <p>21 Q. What's the name of the church?</p> <p>22 A. Oh. Mt. Silla, S-i-l-l-a,</p> <p>23 Missionary Baptist Church.</p>	<p style="text-align: right;">Page 37</p> <p>1 A. In Union Springs.</p> <p>2 Q. Any others?</p> <p>3 A. No, ma'am.</p> <p>4 Q. Where is Mt. Silla Missionary</p> <p>5 Baptist Church?</p> <p>6 A. It's on Locke Avenue, L-o-c-k-e,</p> <p>7 L-o-c-k-e Avenue.</p> <p>8 Q. In Union Springs?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Okay. Are you a member of any</p> <p>11 other professional organizations?</p> <p>12 A. No, ma'am, I'm just a volunteer.</p> <p>13 Q. Okay. Where do you volunteer at?</p> <p>14 A. With the Black Belt Community</p> <p>15 Foundation, with -- I was working with Auburn</p> <p>16 University, and the program ended, as a</p> <p>17 mentor when the mentor -- with the local high</p> <p>18 school through Auburn University Extension</p> <p>19 Service. And whoever call.</p> <p>20 Q. I understand. What is the Black</p> <p>21 Belt Community Foundation?</p> <p>22 A. It's an organization that include</p> <p>23 twelve counties within the State of Alabama.</p>

<p style="text-align: right;">Page 38</p> <p>1 This particular organization was founded --</p> <p>2 well, as a matter of fact, we're serving our</p> <p>3 twentieth year. And it's based upon the</p> <p>4 soil, not the people. It just happened -- it</p> <p>5 just happened that people involved in those</p> <p>6 thirteen counties are predominantly</p> <p>7 Afro-American. So, Bullock County is a part</p> <p>8 of the Black Belt Community Foundation.</p> <p>9 Q. What does the foundation do?</p> <p>10 A. We take what we have to make what</p> <p>11 we need. That's our motto. We serve -- this</p> <p>12 year that ended, I was one of the Hope</p> <p>13 ambassadors. And we would go around and make</p> <p>14 sure, since the pandemic, that people are</p> <p>15 educated about the pandemic, to make sure</p> <p>16 that -- we don't get into business. But we</p> <p>17 tally -- I've been with them, was you</p> <p>18 immunized? What type? Are you -- or do you</p> <p>19 wear gloves, mask, and then, we pass out a</p> <p>20 lot of protective equipment. And we also</p> <p>21 sponsor a food bank. We work with the local</p> <p>22 government to give donation. And we give</p> <p>23 that to the organization, and they give the</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. Okay. So, twice you've talked</p> <p>2 about giving somebody money and getting more</p> <p>3 back. Can you explain that part to me?</p> <p>4 A. Right. Through philanthropists.</p> <p>5 The Black Belt is sponsored by major</p> <p>6 philanthropists throughout the United States.</p> <p>7 Q. Okay.</p> <p>8 A. Okay. So, our job as a local</p> <p>9 chapter is to go out and raise money through</p> <p>10 our individual and government, and then, we</p> <p>11 give it -- when we present it to the central</p> <p>12 office, so to speak, if we raise ten</p> <p>13 thousand, the Black Belt, the philanthropists</p> <p>14 that's giving the Black Belt will give it</p> <p>15 back to us twice -- at least twice as much so</p> <p>16 we can give it back to people that are in</p> <p>17 need. Very good organization. The best I've</p> <p>18 ever known.</p> <p>19 Q. Does the -- does the Black Belt</p> <p>20 Community Foundation or your chapter of it</p> <p>21 receive any state money?</p> <p>22 A. That, I don't know.</p> <p>23 Q. Okay.</p>
<p style="text-align: right;">Page 39</p> <p>1 money back to us sometime four times more.</p> <p>2 And then, at that time, different</p> <p>3 organization that have a 501(c)(3) -- a</p> <p>4 501(c)(3) or a 1 -- I get confused -- that</p> <p>5 they apply for a grant. And the -- for</p> <p>6 instance, our library may have the need. We</p> <p>7 have a youth organization. We can't give it</p> <p>8 to schools or to church, but we can give it</p> <p>9 to organizations within the school and the</p> <p>10 church, for instance, like a health ministry.</p> <p>11 We just do -- like I say, taking</p> <p>12 what we have to making what we need. And</p> <p>13 it's beautiful.</p> <p>14 Q. Do you get any county money?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. What can you tell me about that?</p> <p>17 A. The county gives us a donation,</p> <p>18 the city, and all, and then, we turn it into</p> <p>19 the headquarters. And if we totally get ten</p> <p>20 thousand dollars, the Black Belt would, in</p> <p>21 turn, give us twenty thousand to give out to</p> <p>22 a deserving organization that meet the</p> <p>23 criteria.</p>	<p style="text-align: right;">Page 41</p> <p>1 MS. MESSICK: Can we go off the</p> <p>2 record for just one minute?</p> <p>3</p> <p>4 (Whereupon, a discussion was held</p> <p>5 off the record.)</p> <p>6</p> <p>7 MS. MESSICK: Okay. Let's go</p> <p>8 back on the record.</p> <p>9 Q. Do you have any social media</p> <p>10 accounts?</p> <p>11 A. I'm off it.</p> <p>12 Q. Okay. Have you in the past?</p> <p>13 A. Yes.</p> <p>14 Q. Are those accounts closed down or</p> <p>15 you're just not using them very much?</p> <p>16 A. Well, I was on Facebook, and I</p> <p>17 just got bombarded with too much.</p> <p>18 Q. How long have you been off</p> <p>19 Facebook?</p> <p>20 A. Almost a year.</p> <p>21 Q. When you were on Facebook, was</p> <p>22 your page public or private?</p> <p>23 A. I guess it was public like</p>

<p style="text-align: right;">Page 42</p> <p>1 everybody do it.</p> <p>2 Q. If I wanted to find your public</p> <p>3 Facebook page, what would I look for?</p> <p>4 A. To be honest, my daughters and</p> <p>5 kids put me on it. I am nowhere near</p> <p>6 computer savvy. So, I can't answer that</p> <p>7 question.</p> <p>8 Q. As you sit here today, do you</p> <p>9 remember ever posting anything on Facebook</p> <p>10 about this lawsuit?</p> <p>11 A. I think I have. We have a family</p> <p>12 group, and I was telling them that I was -- I</p> <p>13 would be a plaintiff in the -- in this</p> <p>14 lawsuit to my family group.</p> <p>15 Q. And please tell me everything you</p> <p>16 remember putting on Facebook --</p> <p>17 A. I just told --</p> <p>18 Q. -- about this lawsuit.</p> <p>19 A. -- them that.</p> <p>20 Q. That's all you remember?</p> <p>21 A. Yeah. I just told them that I</p> <p>22 would be a plaintiff to make it amenable to</p> <p>23 have a new second congressional district.</p>	<p style="text-align: right;">Page 44</p> <p>1 A. The population of the State of</p> <p>2 Alabama. I've forgotten the number of each</p> <p>3 district, but I just look at the number. I</p> <p>4 think -- and I don't want to be quoted. But</p> <p>5 I think Alabama is almost, if not, one out of</p> <p>6 four of the population are people of color.</p> <p>7 Now, I could be wrong, but I think I'm close</p> <p>8 to it, if not exact.</p> <p>9 Q. Are you -- when you speak of</p> <p>10 ethnicity and people of color, are you</p> <p>11 focused on people who are Black or African</p> <p>12 American or are you counting everybody who's</p> <p>13 not white?</p> <p>14 A. I think I'm counting all of them</p> <p>15 in the same class. And even -- yes. That's</p> <p>16 what I'm counting.</p> <p>17 Q. Okay. You're counting all</p> <p>18 nonwhite?</p> <p>19 A. Right.</p> <p>20 Q. How did you get involved in this</p> <p>21 lawsuit?</p> <p>22 A. I've been in politics, involved</p> <p>23 since I was twelve. And I was born in 1954.</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. And what do you mean by to get a</p> <p>2 new second congressional district?</p> <p>3 A. The redistricting, the redrawing.</p> <p>4 Q. Tell me in your own words, what</p> <p>5 do you understand this lawsuit to be about?</p> <p>6 A. In my own words. To me, there's</p> <p>7 a major portion of Alabama, especially in the</p> <p>8 rural, and the population -- the entire</p> <p>9 population is not being properly represented.</p> <p>10 When you look at it based upon the numbers, I</p> <p>11 think that the state deserve another district</p> <p>12 that will be amenable for people that look</p> <p>13 like me to represent its people.</p> <p>14 Q. When you say people who look like</p> <p>15 me, we've both got some gray hair, but that's</p> <p>16 not what you're talking about?</p> <p>17 A. No, ma'am.</p> <p>18 Q. Tell me what you're talking</p> <p>19 about.</p> <p>20 A. I'm talking people of different</p> <p>21 descent, your ethnicity.</p> <p>22 Q. You said when you look at the</p> <p>23 numbers. What numbers are you talking about?</p>	<p style="text-align: right;">Page 45</p> <p>1 So, I was involved during the Freedom March</p> <p>2 and the mass meetings.</p> <p>3 Q. Did somebody call you and ask you</p> <p>4 to be a plaintiff?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Okay. Who was that?</p> <p>7 A. I can't recall. But at the time,</p> <p>8 I was serving also as chairman of the</p> <p>9 Commission and chairman of the Democratic</p> <p>10 Executive Committee. So, it just seemed</p> <p>11 logical that I would receive a phone call.</p> <p>12 Q. Okay. Do you know Marcus Caster?</p> <p>13 A. I know the name.</p> <p>14 Q. Okay.</p> <p>15 A. Or I've heard the name.</p> <p>16 Q. Do you know LaKeisha Chestnut?</p> <p>17 A. I don't know her, but I think I</p> <p>18 know the Chestnut family, Attorney Chestnut.</p> <p>19 I don't know if they're related, so I will</p> <p>20 say, no, I don't know her.</p> <p>21 Q. Okay. You're thinking of J.L.</p> <p>22 Chestnut?</p> <p>23 A. That's right. Selma.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q. Right. Do you know Bobby Lee 2 DuBose? 3 A. No, ma'am. 4 Q. Do you know Benjamin Jones? 5 A. No, ma'am. 6 Q. Do you know Rodney Allen Love? 7 A. No, ma'am. 8 Q. Do you know Manasseh Powell? 9 A. No, ma'am. 10 Q. Do you know Wendell Thomas? 11 A. No, ma'am. 12 Q. Do you know Andrew Walker, a 13 plaintiff for the Singleton litigation? 14 A. Yes. Uh-huh. 15 Q. Did you recruit Andrew Walker to 16 be a plaintiff in that case? 17 A. I spoke with him. I didn't -- 18 wouldn't say recruit. 19 Q. Okay. Did you -- did you speak 20 with him before he became a plaintiff? 21 A. Yes, I did. 22 Q. Did you encourage Mr. Walker to 23 be a plaintiff for the Singleton --</p>	<p style="text-align: right;">Page 48</p> <p>1 (Whereupon, Defendant's Exhibit 1 2 was marked for identification and 3 copy of same is attached hereto.) 4 5 Q. (BY MS. MESSICK) I am going to 6 show you what I have marked as Defendant's 7 Exhibit 1 and ask you if you have seen this 8 document before? 9 A. I need to go all the way through 10 to make sure. 11 Q. Absolutely. Take as long as you 12 need. 13 A. I'd say, yes, I have. 14 Q. Do you -- did you see a draft of 15 the complaint before it was filed? 16 A. I don't recall. 17 Q. What is your understanding of the 18 claim in that original complaint? 19 A. What do I -- what, now? 20 Q. What do you understand the claim 21 to be that you brought in this original 22 complaint? What were you challenging in this 23 original complaint?</p>
<p style="text-align: right;">Page 47</p> <p>1 A. Yes, ma'am. 2 Q. Did you encourage anybody else to 3 be -- 4 A. Darryl Andrew. 5 Q. Anybody else? 6 A. Not that I can -- no, ma'am, I 7 didn't. 8 Q. Why did you think Andrew Walker 9 would be a good plaintiff? 10 A. First of all, he's a pastor, a 11 very honest, good man, a forward thinker, and 12 great servant to the community. 13 Q. And why did you think that Darryl 14 Andrew would be a good plaintiff? 15 A. Same. 16 MS. MESSICK: Can we go off the 17 record for thirty seconds? 18 19 (Whereupon, a discussion was held 20 off the record.) 21 22 MS. MESSICK: Let's go back on 23 the record.</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Stacking and packing is what I'm 2 challenging, is that it should be -- my main 3 concern was to create a district, a 4 congressional district that would be amenable 5 for people of color to represent the people 6 in Alabama that have been -- go ahead. 7 Q. Are you saying that you want the 8 person who is elected from Congressional 9 District 2 to be a person of color? 10 A. Yes, I am. 11 Q. Okay. I'm going to show you what 12 I'm marking -- 13 A. Uh-huh. 14 Q. -- as Defendant's Exhibit 2. 15 And, again, I'll ask you if you 16 have seen this document before? 17 18 (Whereupon, Defendant's Exhibit 2 19 was marked for identification and 20 copy of same is attached hereto.) 21 22 A. It's not the same, is it? This 23 is not the same as that (indicating), is it?</p>

<p style="text-align: right;">Page 50</p> <p>1 Q. (BY MS. MESSICK) This is the --</p> <p>2 A. They're styled --</p> <p>3 Q. -- the original complaint.</p> <p>4 A. Uh-huh.</p> <p>5 Q. And that document is labeled the</p> <p>6 First Amended Complaint. And you can see at</p> <p>7 the top in the blue that it was filed earlier</p> <p>8 this year, the one that you're holding was.</p> <p>9 A. I can't say yes or no that I have</p> <p>10 or not. I've had some strange health</p> <p>11 challenges, and that's the reason I don't</p> <p>12 drive nowhere but in little Union Springs.</p> <p>13 And I can't sometime remember a lot of</p> <p>14 things.</p> <p>15 Q. Okay.</p> <p>16 A. And my wife keep up with all my</p> <p>17 appointments and everything. So, I -- I'm</p> <p>18 going to say -- because I want to be very up</p> <p>19 front with you and tell you everything that I</p> <p>20 know. But I can't say yes, I have, or, no, I</p> <p>21 haven't. So, I'm going to have to say I</p> <p>22 don't remember.</p> <p>23 Q. Okay.</p>	<p style="text-align: right;">Page 52</p> <p>1 of it, you know.</p> <p>2 Q. Okay. Do you remember which ones</p> <p>3 you've looked at?</p> <p>4 A. No, ma'am.</p> <p>5 Q. What is your understanding of</p> <p>6 what redistricting is?</p> <p>7 A. My understanding of redistricting</p> <p>8 that every ten years -- I think that's when</p> <p>9 we do the census report -- that the</p> <p>10 population changes, the need changes, and,</p> <p>11 therefore, the lines should be drawn or</p> <p>12 revisited every so often. And based on</p> <p>13 information that I've been given, that</p> <p>14 Alabama, I think -- like I said, twenty</p> <p>15 something percent -- I think I just saw</p> <p>16 twenty-seven percent, and the population</p> <p>17 grew. Based upon that, I would say that's</p> <p>18 why we need redistricting for proper -- for</p> <p>19 proper representation that has been denied</p> <p>20 for years.</p> <p>21 Q. And proper representation is a</p> <p>22 representative of color?</p> <p>23 MS. JASRASARIA: Objection.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Is that okay?</p> <p>2 Q. Absolutely. I don't know or I</p> <p>3 don't remember is a fine answer. Just tell</p> <p>4 me the truth, whatever that is.</p> <p>5 A. That's right.</p> <p>6 Q. Did you read any expert reports</p> <p>7 in this case?</p> <p>8 A. I have somewhere down the line,</p> <p>9 but I don't know what they were. I can't</p> <p>10 recall what they were or what they are.</p> <p>11 Q. Okay.</p> <p>12 A. But I have at some time during</p> <p>13 the cycle somewhere.</p> <p>14 Q. Do you know who Bill Cooper is?</p> <p>15 Bill Cooper.</p> <p>16 A. No, ma'am.</p> <p>17 Q. Okay. Do you know who Maxwell</p> <p>18 Palmer is?</p> <p>19 A. No, ma'am.</p> <p>20 Q. Okay. Do you remember reading</p> <p>21 any court decisions that have been filed in</p> <p>22 this case?</p> <p>23 A. Yeah, I know skimming over some</p>	<p style="text-align: right;">Page 53</p> <p>1 Calls for a legal conclusion, but you may</p> <p>2 answer.</p> <p>3 Q. (BY MS. MESSICK) Well, you just</p> <p>4 said you've been denied proper</p> <p>5 representation, that you've been denied that</p> <p>6 for years. Are you saying that you've been</p> <p>7 denied that because your representative</p> <p>8 hasn't been a person of color?</p> <p>9 MS. JASRASARIA: Same objection.</p> <p>10 You may answer.</p> <p>11 A. I've -- yeah. I could say that</p> <p>12 because in order to know -- who know you</p> <p>13 better than you know or come from your camp</p> <p>14 or your community who have experienced some</p> <p>15 of the lack of services. They're the best</p> <p>16 one that can represent you. In other words,</p> <p>17 I could represent my house better than</p> <p>18 someone else. So, someone who understand my</p> <p>19 plight who have gone through -- and I don't</p> <p>20 want to get on a soapbox because I don't.</p> <p>21 But I was born in the '50s, okay?</p> <p>22 I grew up in a community of Alabama. I grew</p> <p>23 up in a community where -- although we're</p>

<p style="text-align: right;">Page 54</p> <p>1 predominantly Black in Bullock County, but I 2 can remember I had to be born at home because 3 there was -- and we had a hospital that was 4 delivering babies. And I can remember even 5 going to the doctor, you had a colored 6 waiting room and a white waiting room, 7 bathroom, water fountain. 8 I lived in a segregated 9 neighborhood where the dirt was dirt -- I 10 mean, the roads was dirt. The school was 11 segregated. We received secondhand books 12 from the white school the next year, okay? 13 So, I grew up with that. And I've seen it. 14 And it -- still today, still today, the 15 infrastructure is different. 16 There are certain neighborhoods 17 that can't receive broadband, but, then, I go 18 on the other side of town or other 19 communities, you see that. So, that -- the 20 wealth is not being disseminated properly, 21 therefore, I believe and have witnessed that 22 someone who understand my plight will be the 23 best representative.</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. -- talking about people -- 2 A. I'm just saying like we're 3 African Americans, our roots are there. And 4 most of my white brothers' and sisters' roots 5 are from Europe. 6 Q. Okay. Would you agree that 7 things are very different now than they were 8 in the 1950s in Alabama? 9 A. Some things changed, some things 10 remain the same, some things are done with a 11 lot of masquerade. I see -- and I was very 12 fortunate. I see that the voter's rights has 13 been gutted. 14 I was up in DC when it was Holder 15 versus United States, United States versus 16 Holder, or vice versa. And I see that a lot 17 of those progress that we was made -- that 18 was made, we made during the '60s, I've seen 19 them slowly being retracted, slowly being 20 done. And it is done in a systemic way. And 21 I see us backing back -- backing back to a 22 time where I was disenfranchised with so many 23 things. And then, now, I see it happening</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. (BY MS. MESSICK) Are you better 2 represented by someone who is Black but 3 wealthy or by someone who's white but poor? 4 MS. JASRASARIA: Objection. 5 Calls for speculation. 6 A. Yeah, that -- 7 MS. JASRASARIA: But you can 8 answer. 9 A. I can't really answer that 10 because I see my European brothers who are 11 poor even voting against their own interest 12 because of the skin tone. And, I mean, they 13 are poor and they vote for things that would 14 not even help them. So, I'd like to just 15 leave that alone because that's still 16 speculative. 17 Q. (BY MR. MESSICK) What do you 18 mean by your European brothers? 19 A. White. You. My European sister. 20 Q. Okay. So, you're not talking 21 about people you keep in touch with from 22 Germany; you're -- 23 A. No.</p>	<p style="text-align: right;">Page 57</p> <p>1 again if we're -- if we're not careful. 2 I believe in the word "United 3 States". I believe in the Constitution. 4 Q. When you refer to United States 5 V. Holder, are you talking about Shelby 6 County V. Holder? 7 A. Shelby County versus -- right. 8 That's it, Shelby County. 9 Q. What is your understanding of 10 what Shelby County V. Holder was about? 11 A. The Voter's Rights Amendment. 12 And I think it -- don't hold me, but I think 13 it was Section 5 that was done. And I'm not 14 a lawyer and I'm not going to try to play 15 one. But I think that it was a sign of 16 impediment that was established. 17 And I see so many other things. 18 I just used that as a -- as an example that 19 the rights that was gained in the '60s are 20 slowly being removed and renamed, but it 21 still go back to a dirty era. And I call it 22 dirty because it was dark, dirty. I was born 23 in 1954. That was before Blacks was able to</p>

<p style="text-align: right;">Page 58</p> <p>1 vote.</p> <p>2 Q. And what is your understanding of</p> <p>3 what Section 5 did?</p> <p>4 A. It removed a lot of -- like I</p> <p>5 said, I can't remember all. And I know I</p> <p>6 know it. So, I'll have to -- I'll have to go</p> <p>7 back and totally revisit it so I can speak</p> <p>8 intelligent on it.</p> <p>9 Q. Okay.</p> <p>10 A. Preclearance and a lot of things</p> <p>11 were involved in it.</p> <p>12 Q. So, you said that some things are</p> <p>13 the same as they were in the 1950s. What</p> <p>14 things are the same?</p> <p>15 A. Look at the infrastructure in the</p> <p>16 Black Belt. Look at -- I'll give you an</p> <p>17 example if you don't mind. I was chairman of</p> <p>18 the Bullock County Commission for seventeen</p> <p>19 years. We applied for a CDBG grant, a</p> <p>20 competitive grant for a community for clean</p> <p>21 water and sewage. We was denied because we</p> <p>22 said it only will affect or impact ninety</p> <p>23 people. So, I had to argue with ADECA to get</p>	<p style="text-align: right;">Page 60</p> <p>1 after you fought with them?</p> <p>2 A. Oh, yes.</p> <p>3 Q. Were there any other grants that</p> <p>4 you were denied by ADECA?</p> <p>5 A. Well, yeah. And, of course,</p> <p>6 you're always going to do that because you</p> <p>7 apply for so many and only so many are going</p> <p>8 to be approved.</p> <p>9 Q. Were others approved?</p> <p>10 A. Yeah, some was approved and some</p> <p>11 of them wasn't. Because mostly was that we</p> <p>12 just broke up a gang. A lot of time, we</p> <p>13 couldn't reach the match.</p> <p>14 Q. And by that, you mean you were</p> <p>15 required to put certain funds in order --</p> <p>16 A. Right.</p> <p>17 Q. -- to get more funds from them?</p> <p>18 A. You know, it may be</p> <p>19 twenty/eighty, thirty/seventy, or whatever.</p> <p>20 Q. What things have changed since</p> <p>21 the 1950s in Alabama?</p> <p>22 A. Before 1950, after</p> <p>23 reconstruction, I saw -- I worked a poll for</p>
<p style="text-align: right;">Page 59</p> <p>1 it because, based upon just your raw numbers,</p> <p>2 we weren't able to get it. And so, we had to</p> <p>3 argue it should be done on a pro rata rate.</p> <p>4 And all the time, the small communities and</p> <p>5 especially within the Black Belt, you know,</p> <p>6 we seemed to be last in everything rather</p> <p>7 than them saying let's do everything for all</p> <p>8 of Alabama. Make it even. And I -- and I</p> <p>9 want that. It's such a utopia thought.</p> <p>10 But when you sit back, sit in my</p> <p>11 shoes, live in my neighborhood, and you will</p> <p>12 see it, the health disparity, all of those</p> <p>13 things, all those things. That's why we</p> <p>14 need -- that's why I joined as a plaintiff so</p> <p>15 that the people that look like me, live in my</p> <p>16 neighborhood, in neighborhoods similar, we</p> <p>17 need someone that look like us who have been</p> <p>18 through the fire or their family have been</p> <p>19 through the fire and want to represent us.</p> <p>20 And by represent us, will represent all of us</p> <p>21 because all of us are Alabama and all of us</p> <p>22 are America.</p> <p>23 Q. Did you get the grant from ADECA</p>	<p style="text-align: right;">Page 61</p> <p>1 Mr. Fred Gray and Thomas Reed to become two</p> <p>2 Black legislators after reconstruction in the</p> <p>3 '70s. I saw that. And I saw the benefit</p> <p>4 from their -- from their labor that brought</p> <p>5 changes within my district that would never</p> <p>6 have happened.</p> <p>7 I saw our school system receiving</p> <p>8 new books. I grew up -- at first, we only</p> <p>9 had one microscope at the entire high school.</p> <p>10 But I think it was Johnson, Federal Judge</p> <p>11 Johnson that ruled that Bullock County should</p> <p>12 have -- because of our population should have</p> <p>13 one school to consolidate, integrate,</p> <p>14 although they never integrated. We just more</p> <p>15 or less desegregate. But I saw resources</p> <p>16 coming in that was never there.</p> <p>17 So, I could go on, but I just --</p> <p>18 I see -- I see because we have had someone</p> <p>19 that look like me at the table that can tell</p> <p>20 them, truly tell, speak my story, fight for</p> <p>21 our story -- everything we ever got, we had</p> <p>22 to fight for it.</p> <p>23 Q. And you said that some things are</p>

<p style="text-align: right;">Page 62</p> <p>1 done, I believe you used the word</p> <p>2 "masquerade". What are you talking about</p> <p>3 there?</p> <p>4 A. Using -- changing words, code</p> <p>5 words, and strategically drawn out of</p> <p>6 district through different things, or if you</p> <p>7 go to financial institutions and you are a</p> <p>8 person of color, and they will easily say,</p> <p>9 well, you've got this blemish on your record.</p> <p>10 And I've seen this happen. We can't finance</p> <p>11 that. And I sold cars for an Afro-American</p> <p>12 owner. And I've seen where it was turned</p> <p>13 down. And I've seen someone else credit was</p> <p>14 even worse than theirs, but the same</p> <p>15 financial institution financed it. And they</p> <p>16 had -- even had a higher debt rate. But they</p> <p>17 can utilize little snippets to deny you of</p> <p>18 opportunity.</p> <p>19 MS. JASRASARIA: I think we've</p> <p>20 been going for about an hour and twenty</p> <p>21 minutes. Can we take a short break?</p> <p>22 MS. MESSICK: Sure.</p> <p>23</p>	<p style="text-align: right;">Page 64</p> <p>1 Alabama could lose representation.</p> <p>2 That's my understanding.</p> <p>3 On my end, we were saying that we</p> <p>4 want to make sure that everybody's counted so</p> <p>5 that will increase funding for our county,</p> <p>6 our community. So, that's -- that was my</p> <p>7 understanding.</p> <p>8 Q. Okay. Do you know if Alabama's</p> <p>9 population grew or decreased?</p> <p>10 A. I think within the last couple</p> <p>11 years, in some regions, it has, and some,</p> <p>12 we've lost. Overall, I don't know exactly.</p> <p>13 I know that overall -- just from a snapshot</p> <p>14 and hearing things on the news. I don't have</p> <p>15 factual data.</p> <p>16 Q. I'm going to give you a</p> <p>17 document that I am marking as Defendant's</p> <p>18 Exhibit 3.</p> <p>19</p> <p>20 (Whereupon, Defendant's Exhibit 3</p> <p>21 was marked for identification and</p> <p>22 copy of same is attached hereto.)</p> <p>23</p>
<p style="text-align: right;">Page 63</p> <p>1 (Whereupon, a brief recess was</p> <p>2 taken.)</p> <p>3</p> <p>4 MS. MESSICK: Okay. Let's go</p> <p>5 back on the record.</p> <p>6 Q. You mentioned the 2020 Census</p> <p>7 earlier. Did you pay much attention to that</p> <p>8 while it was going on?</p> <p>9 A. Oh, yes.</p> <p>10 Q. How so?</p> <p>11 A. Helping by disseminating</p> <p>12 information at church, telling people how</p> <p>13 important it is for them to take the census,</p> <p>14 speaking engagement, just community</p> <p>15 awareness.</p> <p>16 Q. Okay. How does population play</p> <p>17 into redistricting?</p> <p>18 A. The numbers decide, legislators,</p> <p>19 and more -- on my understanding --</p> <p>20 Q. Yes, sir.</p> <p>21 A. -- on my understanding, that the</p> <p>22 numbers -- if your population grows up or if</p> <p>23 it goes down, then, the -- even the State of</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. (BY MS. MESSICK) And this is</p> <p>2 just a map of Alabama counties that I got off</p> <p>3 the internet. This may be a helpful</p> <p>4 reference to you --</p> <p>5 A. Okay.</p> <p>6 Q. -- during the deposition.</p> <p>7 Can you tell me which counties</p> <p>8 are in the Black Belt?</p> <p>9 A. Yes, ma'am. I can -- I can tell</p> <p>10 you. And I may miss one or two, now, bear in</p> <p>11 mind. Okay.</p> <p>12 Q. You looked like you were reaching</p> <p>13 for a pen. Do you want a pen?</p> <p>14 A. No, I was just -- I was going to</p> <p>15 put my glasses -- sometime I see better with</p> <p>16 them and sometime I don't.</p> <p>17 Q. Okay.</p> <p>18 A. Thank you, though.</p> <p>19 I can say from the western county</p> <p>20 that we have Greene, Sumter, Marengo,</p> <p>21 Choctaw, Wilcox, Dallas, Lowndes, then, we</p> <p>22 skip Montgomery and we go to Bullock and</p> <p>23 Macon. Let me see. How many is that? One,</p>

<p style="text-align: right;">Page 66</p> <p>1 two, three, four, five, six, seven, eight, 2 nine, ten. Let me see. I better get my pen 3 and number them. 4 Q. It sounded like you counted to 5 ten. I only heard nine. 6 A. That's what I'm saying. I'm 7 going back through. 8 Q. Yeah. 9 A. I can't keep them all in my head. 10 I think I have them now. 11 Q. Okay. So, what are they? 12 A. I think -- now, don't hold me -- 13 Pickens, Greene, Sumter, Marengo, Choctaw, 14 Clarke, Wilcox, Dallas, Perry, Hale, Lowndes, 15 Bullock, and Macon. I think that's thirteen. 16 Q. And it sounded like you 17 specifically excluded Montgomery. Why did 18 you exclude Montgomery? 19 A. I didn't exclude them. They're 20 not -- they're -- I don't know what was the 21 reason. I wasn't at the table when these was 22 designated as Black Belt counties. 23 Q. Okay.</p>	<p style="text-align: right;">Page 68</p> <p>1 redistricting, what is your understanding of 2 what happened after the census numbers came 3 out in 2020? 4 A. That -- you have to leave that to 5 the professionals. I'm nowhere near that. 6 Q. Okay. So, the legislature, then, 7 undertook a process to draw the new lines. 8 A. Uh-huh. 9 Q. Did you follow the legislative 10 proceedings? 11 A. I followed some of it. 12 Q. Okay. Did you attend any of the 13 hearings? And that would include remote. 14 A. I went to certain meetings but 15 not necessarily hearings. I went to certain 16 meetings. 17 Q. What meetings are you thinking 18 of? 19 A. Some community meetings with some 20 of the -- some of the people that was a part 21 of the map drawing process were going to 22 different counties and giving us an update. 23 Q. Were those people legislators?</p>
<p style="text-align: right;">Page 67</p> <p>1 A. This is -- was designated by the 2 Black Belt Community Foundation. So, I 3 didn't have -- I'm not excluding them. I'm 4 just going with the ones that I'm affiliated 5 with. 6 Q. I understand. 7 A. Okay. 8 Q. Where in Alabama do Black 9 citizens reside in large numbers? 10 A. Mostly in the Black Belt. Well, 11 of course, if you're just looking at raw 12 numbers, of course, you've got to throw in 13 Jefferson County, Madison County, Mobile, and 14 Montgomery, you know, simply because just raw 15 numbers. 16 Q. Do you know if the Black Belt 17 gained or lost population between the 2010 18 Census and the 2020 Census? 19 A. I know that Bullock County 20 gained. I don't know how much, but it wasn't 21 too significant. But we did gain during the 22 census. 23 Q. So, with respect to</p>	<p style="text-align: right;">Page 69</p> <p>1 A. Some. 2 Q. Were they also maybe -- how would 3 you describe the other people who were 4 involved in presenting materials at those 5 community meetings? 6 A. I would say people that have 7 worked with the Democratic Party. They were 8 some professionals, map drawers, and -- 9 Q. Which legislators do you remember 10 being at these meetings? 11 A. I have gone to several meetings, 12 and I just know it was a bunch of them that 13 stood up and said that -- Representative 14 this, Senator that. I don't want to give any 15 names because I don't want to misrepresent 16 anyone. But I just know that they -- that 17 when they stood up, they announced their 18 positions. 19 Q. Were these community meetings 20 that you attended, were they in person or 21 were they remote? 22 A. In person. 23 Q. Okay. And I am -- just to be</p>

<p style="text-align: right;">Page 70</p> <p>1 clear, I am talking about, again, after the 2 2020 Census data came out. So, this is in 3 2021? 4 A. I want to say yes, but I can't 5 put down a specific date. I want to say yes, 6 but I'm not actually sure. 7 Q. Okay. Did you speak at any of 8 these community meetings? 9 A. Welcomed them. If it was held in 10 Bullock County, I welcomed them, offered them 11 some water -- 12 Q. Okay. 13 A. -- accommodations. 14 Q. Did you make any public 15 statements at these meetings about what you 16 wanted the map to look like? 17 A. No, I didn't. 18 Q. Did you, in 2021, submit any 19 congressional maps to the Alabama Legislature 20 for their consideration? 21 A. You said did I submit a map? 22 Q. You or an organization that you 23 were a part of.</p>	<p style="text-align: right;">Page 72</p> <p>1 (Whereupon, Defendant's Exhibit 4 2 was marked for identification and 3 copy of same is attached hereto.) 4 5 Q. (BY MS. MESSICK) I'm handing you 6 what I have marked as Defendant's Exhibit 4. 7 And the back page of 4 is a map. I'll 8 represent to you that this is the map that 9 the Alabama Legislature passed in 2021. Do 10 you recognize this map? 11 A. Ma'am, as I said, 2021 was a very 12 challenging time for me, so I can't say yes 13 or no. Yeah. No, I can't say yes or no. I 14 can't. 15 Q. Looking at this map as you sit 16 here today, what do you think of it? 17 A. I see where Mobile is listed as 1 18 and not in 2. Those -- do those numbers 19 represent the congressional districts? 20 Q. Yes, they do. 21 A. Okay. I see that -- right with 22 this one, Mobile is listed there as in 23 District 1. And I think that this one was</p>
<p style="text-align: right;">Page 71</p> <p>1 A. No. 2 Q. Okay. Do you remember looking at 3 maps in 2021, congressional maps? 4 A. At some time, again, I don't know 5 what year, I was going through a very -- I 6 was going through some challenges medically 7 during those years. So, I don't want to say 8 what year. 9 Q. Do you know which maps they were? 10 A. I've seen the one that was 11 first -- I've seen several maps, ma'am. I've 12 seen several, so I can't say which one. I 13 just remember saying this is this map, this 14 is that map. I've seen several. 15 Q. Did you submit any documents 16 other than maps? Documents that are not 17 maps, did you submit any of those kinds of 18 documents -- 19 A. I didn't submit -- 20 Q. -- to the Legislature? 21 A. No, ma'am. No, I didn't. 22 Q. Okay. 23</p>	<p style="text-align: right;">Page 73</p> <p>1 the one that -- this has been changed 2 because -- by -- I think by the -- the courts 3 directed them to change this. Am I correct? 4 Q. You are. 5 A. Okay. 6 Q. Right. This is the map that the 7 Legislature drew in 2021 -- 8 A. Uh-huh. 9 Q. -- that you've sued about. 10 A. Right. Uh-huh. 11 Q. What concerns do you have with 12 this map? 13 A. One of the things -- let me read 14 some of the things. Just looking at the map 15 without a breakdown, like, will have average 16 voting age and the percentage of all that. I 17 can't just see it just off the cuff and then 18 make an informed decision. There's more to 19 it than just looking at a map. I looked at 20 the average voting age and the number of -- 21 the percentage of Afro-Americans and all 22 that. And then, those are -- that's the map 23 that I chose, me, myself, personally was</p>

<p style="text-align: right;">Page 74</p> <p>1 about because it made more amenable. But I 2 can't say anything about this. 3 But the people that I listened to 4 are more expert on this, and they crunched 5 the numbers. And when it came back, the 6 numbers was better than this one 7 (indicating). 8 Q. Okay. What do you understand 9 happened in this lawsuit after this map was 10 passed? 11 MS. JASRASARIA: Objection. It 12 calls for a legal conclusion. 13 You can respond. 14 A. Yeah. I can't -- 15 Q. (BY MS. MESSICK) I'm not asking 16 for a legal conclusion. I'm asking factually 17 what happened. This lawsuit was passed -- 18 I'm sorry. This map was passed -- 19 A. By the state legislature. 20 Q. -- by the state legislature and 21 it was signed into law by the governor, and 22 then, you sued. 23 A. That's right.</p>	<p style="text-align: right;">Page 76</p> <p>1 case while it was in the Supreme Court? 2 A. Other than at church and 3 different -- to ask everyone to please pray 4 that we get the results so that a gang -- so 5 that we'll be able to have proper 6 representation. And still praying. 7 Q. What did the Supreme Court rule 8 just to the best of your understanding? 9 A. As related to what? 10 Q. When your case went to the United 11 States Supreme Court, what did they decide? 12 A. I think they -- Mobile was 13 included in another -- and like I said -- 14 maybe I'm not -- maybe I'm not understanding 15 your question well enough. I think that it 16 was redrawn whereas it would be more 17 amenable. I think I'm repeating myself. 18 Q. Okay. When the -- after the 19 Supreme Court ruled -- 20 A. Uh-huh. 21 Q. -- the Legislature was given an 22 opportunity to draw a new map. 23 A. Uh-huh.</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. And then, what happened in the 2 courts? 3 A. I think that the court -- I think 4 there was a panel that said that that wasn't 5 fair, for lack of better term, and they 6 directed them to do -- to redraw it again. 7 And they basically came back with the same 8 map. And then, the court itself had to 9 redraw it because it seemed that the 10 legislators was playing peekaboo, for lack of 11 better term. In other words, I'm sending you 12 the same map, as I said before about 13 masquerading, and didn't do exactly what we 14 was asking. So, finally, the court itself 15 either drew it or had outside to draw it. 16 Q. Okay. Are you aware that this 17 case went to the United States Supreme Court? 18 A. Yes, I am. 19 Q. Did you go to the oral argument 20 in Washington, DC? 21 A. No, ma'am. 22 Q. Okay. Did you make any public 23 decision -- any public statements about this</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. And you've alluded to that 2 already. 3 A. Right. 4 Q. Did you follow those legislative 5 proceedings? 6 A. As much as I could. 7 Q. Did you review any of the maps 8 that were submitted? 9 A. I believe I did. 10 Q. Do you remember which maps you 11 reviewed? 12 A. I can't recall. 13 Q. Do you know if you submit -- I'm 14 sorry. Strike that. 15 Did you submit any maps or other 16 documents to the Legislature during those 17 proceedings? 18 A. I never drew a map. 19 20 (Whereupon, Defendant's Exhibit 5 21 was marked for identification and 22 copy of same is attached hereto.) 23</p>

<p style="text-align: right;">Page 78</p> <p>1 Q. (BY MS. MESSICK) I'm handing you 2 what I've marked as Defendant's Exhibit 5. 3 Do you represent that -- do you recognize 4 this map? 5 A. Yes, I do recognize it. 6 Q. What do you understand this to 7 be? 8 A. I recognize this map. I think 9 this is the one that is being utilized in 10 this election cycle. Am I correct? 11 Q. No. 12 A. Okay. 13 Q. But it probably doesn't look that 14 different. 15 A. Yeah. Like I said -- and I think 16 I recognize the map, but I don't want to say 17 definitive. But I do -- 18 Q. This is a map that the Caster 19 plaintiffs, including you, and the Milligan 20 plaintiffs -- 21 A. Uh-huh. 22 Q. -- submitted to the 23 Legislature --</p>	<p style="text-align: right;">Page 80</p> <p>1 elect someone who looks like me. The map 2 that -- if this is the map -- and I can't say 3 for certain. But the group that I -- that 4 I'm a plaintiff with, if this is the map -- 5 if this is the map, then, I'll agree with it 6 because I wouldn't be a plaintiff if I didn't 7 agree with it. 8 Q. Did you see this map before you 9 submitted it to the Legislature? 10 A. And I -- and I know when you 11 said -- I hope -- please explain when you 12 say -- when you're saying that you submitted. 13 And explain that to me, please, because I'm 14 not understanding when you're saying you 15 submitted. Because as I said, I, as an 16 individual, didn't submit anything. I agreed 17 with certain things. 18 Q. Okay. You mentioned Mobile 19 earlier when you looked at Exhibit 4, which 20 is the map that the Legislature had drawn. 21 A. Uh-huh. 22 Q. Why do you like parts of Mobile 23 being part of Congressional District 2?</p>
<p style="text-align: right;">Page 79</p> <p>1 A. Uh-huh. 2 Q. -- in 2023 -- 3 A. Uh-huh. 4 Q. -- after the Supreme Court ruled 5 and the Legislature was drawing a new map. 6 A. Uh-huh. 7 Q. This is the map -- Exhibit 5 is 8 the map that you submitted through your 9 lawyers. Can you tell me why you -- do you 10 like this map better than Exhibit 4, which 11 was the map that the Legislature had drawn? 12 A. Well, I've never liked the one 13 the Legislature draw -- drew up. 14 Q. Okay. Why do you think the one 15 that you submitted, which is the one that 16 you're holding, Exhibit 5, why is that one 17 better than the one the Legislature drew? 18 A. Because it'll give us an -- it'll 19 give us an opportunity to have some 20 representation that would be profitable to my 21 community. 22 Q. How does it do that? 23 A. It gives us an opportunity to</p>	<p style="text-align: right;">Page 81</p> <p>1 A. Because we have a large number of 2 Black voters in Mobile. And I think -- I've 3 forgot the number that you have to in order 4 to just whatever -- how many people. And 5 that brought -- that help brought the numbers 6 up. And the experts explained it. And then, 7 when they explained it to us, the map drawers 8 and all the experts, I was in concurrence 9 with them. 10 Q. Okay. Did you speak at any of 11 the legislative proceedings late last year 12 when they were drawing the map after the 13 Supreme Court had ruled? 14 A. No, ma'am. I leave that up to 15 the expert. 16 Q. Okay. Did you submit any 17 documents to the Legislature in late 2023 18 when they were drawing a new map? 19 A. As I said before, I, Ronald 20 Smith, individually, didn't send anything. 21 22 (Whereupon, Defendant's Exhibit 6 23 was marked for identification and</p>

<p style="text-align: right;">Page 82</p> <p>1 copy of same is attached hereto.)</p> <p>2</p> <p>3 Q. (BY MS. MESSICK) I'm handing you</p> <p>4 what I've marked as Defendant's Exhibit 6.</p> <p>5 And I will represent to you that this is the</p> <p>6 map that the Legislature adopted in 2024.</p> <p>7 What's wrong with this map, in your view?</p> <p>8 A. Now, who submitted this map?</p> <p>9 Q. Exhibit 6 is the map that the</p> <p>10 Legislature drew in 2023 after the Supreme</p> <p>11 Court ruled.</p> <p>12 A. Ma'am, I'm not an expert at map</p> <p>13 reading.</p> <p>14 Q. Okay. Do you have any opinion</p> <p>15 about what role, if any, race played in the</p> <p>16 creation of this map?</p> <p>17 A. Yes, I do.</p> <p>18 Q. And what is that opinion?</p> <p>19 A. Status quo and that the status</p> <p>20 quo continued.</p> <p>21 Q. Do you have an opinion about what</p> <p>22 role race should have played in drawing this</p> <p>23 map?</p>	<p style="text-align: right;">Page 84</p> <p>1 systemically where that their agenda will</p> <p>2 always be there and your agenda -- your</p> <p>3 agenda will never be there because you are</p> <p>4 drawn out of it. I hope that makes sense.</p> <p>5 Q. Do you have an opinion about what</p> <p>6 role, if any, politics played in the drawing</p> <p>7 of the 2023 map?</p> <p>8 A. Which map specifically are you</p> <p>9 speaking of?</p> <p>10 Q. Exhibit 6, the map that the</p> <p>11 Legislature drew in 2023.</p> <p>12 A. Of course, politics were in it.</p> <p>13 Q. Okay. Can you tell me more about</p> <p>14 that?</p> <p>15 A. Just like I just said. To remain</p> <p>16 in a position of authority, the politicians</p> <p>17 are choosing the people versus the people</p> <p>18 choosing the politician.</p> <p>19 Q. What political party do you</p> <p>20 understand to have a majority in the Alabama</p> <p>21 Senate?</p> <p>22 A. The Republican Party.</p> <p>23 Q. And what political party do you</p>
<p style="text-align: right;">Page 83</p> <p>1 A. Yes.</p> <p>2 MR. WALKER: I'm sorry. What was</p> <p>3 the question?</p> <p>4 MS. MESSICK: Do you have an</p> <p>5 opinion about what role race should have</p> <p>6 played --</p> <p>7 MR. WALKER: Okay. Thank you.</p> <p>8 MR. MESSICK: -- in drawing this</p> <p>9 map?</p> <p>10 A. I think that it should be used,</p> <p>11 let the people choose their representative</p> <p>12 rather than the representative choosing their</p> <p>13 people.</p> <p>14 Q. (BY MS. MESSICK) Can you expand</p> <p>15 on that?</p> <p>16 A. Yes. I think that impediments</p> <p>17 all have been done and still doing so that</p> <p>18 the status quo can continue to be in a</p> <p>19 position of authority and decision-makers.</p> <p>20 That means that it's like a private country</p> <p>21 club. And no matter what and that we -- that</p> <p>22 the people in position of authority will</p> <p>23 remain there because they could set up</p>	<p style="text-align: right;">Page 85</p> <p>1 understand to have the majority in the</p> <p>2 Alabama House of Representatives?</p> <p>3 A. Republican Party.</p> <p>4 Q. And what party is Governor Kay</p> <p>5 Ivey a member of?</p> <p>6 A. Republican Party.</p> <p>7 Q. Is it your opinion that the</p> <p>8 Republicans were trying to keep a Republican</p> <p>9 in Congressional District 2?</p> <p>10 A. Without a doubt.</p> <p>11 Q. Do you know what factors the</p> <p>12 Legislature considers in deciding how to draw</p> <p>13 districts?</p> <p>14 A. I don't know all the ingredients</p> <p>15 that goes into making the sausage, but I know</p> <p>16 when the sausage come out, it's not palatable</p> <p>17 to my tongue.</p> <p>18 Q. Okay. Do you know what a</p> <p>19 community of interest is?</p> <p>20 A. I've heard that term, but please</p> <p>21 explain it to me.</p> <p>22 Q. Well, I was going to ask you to</p> <p>23 explain it to me what your understanding is.</p>

<p style="text-align: right;">Page 86</p> <p>1 A. I -- I've heard it, but I'm not 2 astute enough to really explain it. 3 Q. Okay. You were speaking earlier 4 about wanting representation for you and 5 people like you who have had similar 6 experiences with you. Let's assume that 7 those people that you were thinking of are 8 your community of interest. What 9 characteristics do those people share? I 10 think that from what you've told me earlier 11 that they tend to be Black and to be poor and 12 to have had struggles with services in 13 Alabama; is that fair? 14 A. It has some validity to it but 15 also not all of them are poor. I don't want 16 to paint with a broad brush -- 17 Q. Okay. 18 A. -- and say that all of them are 19 poor. 20 It's the opportunities that it is 21 not catering to all of us. My belief is that 22 we are one blood and we all should be able to 23 enjoy all the beauties that was given -- that</p>	<p style="text-align: right;">Page 88</p> <p>1 A. The same desires, some of the 2 same challenges, and that -- yeah, I'll leave 3 it right there. 4 Q. Would you give that same answer 5 for -- you said you would assume that Black 6 citizens in Mobile probably have something in 7 common with people in the Black Belt. Is it 8 the same sort of thing that you just 9 described for City of Mobile and Montgomery? 10 A. Wait a minute. Start -- I'm 11 sorry. 12 Q. I asked you first about Black 13 citizens in Mobile -- 14 A. Uh-huh. 15 Q. -- having something in common 16 with the Black Belt -- 17 A. Okay. 18 Q. -- and then about Black citizens 19 of Mobile having something in common with 20 Montgomery. 21 In both cases, you said you would 22 assume that they do? 23 A. Right.</p>
<p style="text-align: right;">Page 87</p> <p>1 God-given rights and no one should be 2 Pharisees and Sadducees to remain in power. 3 It is my belief that, again, we are one 4 blood. 5 Q. When you say we are one blood, do 6 you mean all people or -- 7 A. All people. 8 Q. -- or all Black people? 9 A. All people come from our Holy 10 Father of one blood. 11 Q. Do you know if Black residents of 12 the City of Mobile have anything in common 13 with residents of the Black Belt? 14 MS. JASRASARIA: Objection. 15 Calls for speculation. 16 You can answer. 17 A. Again, I would assume. 18 Q. (BY MS. MESSICK) Do you know if 19 Black residents in Mobile have anything in 20 common with people in Montgomery? 21 A. I would assume. 22 Q. What do you assume they have in 23 common?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. And for Montgomery, you said that 2 they probably have the same desires and 3 challenges. Are the things that connect 4 Black citizens in Mobile and the Black Belt, 5 would you assume that that would also be the 6 same desires and challenges? 7 A. Yes, I believe so on that one. 8 Q. What kinds of desires are you 9 thinking of? 10 A. Accessibility to proper 11 education, healthcare. And I'm not just 12 speaking of a hospital, which I'd love for 13 everyone to have one. But affordable 14 healthcare, affordable housing, and all those 15 other things that make up an infrastructure. 16 And so, yeah, I would assume that. 17 Q. Do you think that those needs are 18 unique to Black citizens? 19 A. Yes. I mean, no. Wait, wait, 20 wait, wait, wait. Let me reframe that. Say 21 your question again if you don't mind, 22 please. 23 Q. Do you think that those needs are</p>

<p style="text-align: right;">Page 90</p> <p>1 unique to Black citizens?</p> <p>2 A. Meaning that they -- that Black</p> <p>3 citizens are the only one?</p> <p>4 Q. Right.</p> <p>5 A. I think that we are harmed more</p> <p>6 by not being able to. But as I stated also</p> <p>7 earlier, that some of my poor European</p> <p>8 brothers and sisters are harmed, also --</p> <p>9 Q. Okay.</p> <p>10 A. -- and don't realize it.</p> <p>11 That's my assumption.</p> <p>12 Q. Yeah, you said earlier you think</p> <p>13 that some white residents of Alabama vote</p> <p>14 against their interest.</p> <p>15 A. Uh-huh.</p> <p>16 Q. Can you expand a bit on that?</p> <p>17 A. Using a phrase from Lyndon Baines</p> <p>18 Johnson, he stated years ago -- he said, if</p> <p>19 you can convince the lowliest white man that</p> <p>20 he's better than any man of color -- and I</p> <p>21 don't curse -- he said, heck, you won't have</p> <p>22 to pick his pocket. He'll empty it to you.</p> <p>23 And so, my understanding is that</p>	<p style="text-align: right;">Page 92</p> <p>1 opportunity and merged together, bringing all</p> <p>2 of our qualities together. It would make</p> <p>3 that bouquet even beautiful. It would make</p> <p>4 Alabama more beautiful. It would make</p> <p>5 America, the world more beautiful.</p> <p>6 Q. When you talk about, like,</p> <p>7 infrastructure not being as good in someplace</p> <p>8 like Bullock County --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- as it is somewhere else in the</p> <p>11 state, how do -- how do you know that's</p> <p>12 because of race and not money?</p> <p>13 MS. JASRASARIA: Objection.</p> <p>14 Calls for speculation.</p> <p>15 You can answer.</p> <p>16 A. My daughter live in Shelby</p> <p>17 County. Both my daughters live in Shelby</p> <p>18 County, okay?</p> <p>19 Q. (BY MS. MESSICK) Okay.</p> <p>20 A. They work in north Alabama. And</p> <p>21 when I go to visit them -- Shelby County is</p> <p>22 probably one of the richest counties there</p> <p>23 is. They have a better -- higher education.</p>
<p style="text-align: right;">Page 91</p> <p>1 a lot of our poor white people, if you --</p> <p>2 because it's been so indoctrinated into a lot</p> <p>3 of -- not everybody now.</p> <p>4 Q. Okay.</p> <p>5 A. Again, I don't want to paint with</p> <p>6 a brush. But a huge majority believe because</p> <p>7 I'm Black, I should be subservient, and</p> <p>8 because I'm white, I should be supreme. And</p> <p>9 that's an interpretation. And then, you see</p> <p>10 it being applied in a lot of arenas.</p> <p>11 Q. How so?</p> <p>12 A. As I stated, look at the</p> <p>13 infrastructure in predominantly Black</p> <p>14 communities. So, it's not being applied even</p> <p>15 though we use the word "same blood".</p> <p>16 Let me use another little small</p> <p>17 analogy. You see a bowl of roses, red roses.</p> <p>18 They're so pretty, aren't they? I love them.</p> <p>19 I have to get them for my wife. But, then,</p> <p>20 when you put yellow roses, blue roses, purple</p> <p>21 roses, it's a bouquet of roses. And that's</p> <p>22 what makes it even a better arrangement is</p> <p>23 when we -- everybody having the equal</p>	<p style="text-align: right;">Page 93</p> <p>1 And the percentage of the population is what,</p> <p>2 the higher percentage? It's white. So, when</p> <p>3 you put those factors in, so race is -- have</p> <p>4 to be utilized in it. Nothing against Shelby</p> <p>5 County. Nothing against no county. But the</p> <p>6 factor -- facts are, the little community my</p> <p>7 daughter live in is called Margaret, Alabama.</p> <p>8 It's about as big as this room.</p> <p>9 Q. Okay.</p> <p>10 A. But it is a very influential --</p> <p>11 it's a new neighborhood. But the</p> <p>12 infrastructure in that neighborhood is so</p> <p>13 nice.</p> <p>14 Q. So, Shelby County has more money</p> <p>15 than Bullock County?</p> <p>16 A. Oh, yes.</p> <p>17 Q. Are there Black areas of Shelby</p> <p>18 County, areas where more Black residents</p> <p>19 live?</p> <p>20 A. If it is, I'm not being aware a</p> <p>21 particular Black, but I'm sure there is. But</p> <p>22 for the most of it -- I haven't been all over</p> <p>23 the county. I just go straight to my</p>

<p style="text-align: right;">Page 94</p> <p>1 daughter's house.</p> <p>2 Q. Are there -- do your daughters</p> <p>3 have a lot of Black neighbors?</p> <p>4 A. There's a few but</p> <p>5 predominantly -- she live in a neighborhood</p> <p>6 that's probably ninety percent European</p> <p>7 America.</p> <p>8 Q. Okay. You said you have a son in</p> <p>9 Prattville?</p> <p>10 A. Right.</p> <p>11 Q. What is his neighborhood like</p> <p>12 racially?</p> <p>13 A. It is predominantly white, upper</p> <p>14 middle class, and, therefore, the amenities</p> <p>15 around it are so available for him, him and</p> <p>16 his wife and son.</p> <p>17 Q. And you have a son also in Macon</p> <p>18 County?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. And economically, what is Macon</p> <p>21 County like? Is it more like Bullock County</p> <p>22 or more like Shelby County?</p> <p>23 A. So much like Bullock County.</p>	<p style="text-align: right;">Page 96</p> <p>1 that the court appointed a special master?</p> <p>2 A. That's right.</p> <p>3 Q. Okay. That's the outside help</p> <p>4 you were referring to --</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. -- earlier?</p> <p>7 A. Uh-huh.</p> <p>8 Q. The special master filed a report</p> <p>9 with the court that included three different</p> <p>10 maps. Have you seen that report?</p> <p>11 A. No, ma'am, I haven't.</p> <p>12</p> <p>13 (Whereupon, Defendant's Exhibit 7</p> <p>14 was marked for identification and</p> <p>15 copy of same is attached hereto.)</p> <p>16</p> <p>17 Q. (BY MS. MESSICK) I'm going to</p> <p>18 hand you what I've marked as Defendant's</p> <p>19 Exhibit 7.</p> <p>20 A. Okay.</p> <p>21 Q. This is the court's order</p> <p>22 adopting one of the special master's maps.</p> <p>23 Can you take a minute to look at this</p>
<p style="text-align: right;">Page 95</p> <p>1 We're right there together (indicating). All</p> <p>2 the commonalities are there.</p> <p>3 Q. What does your son in Macon</p> <p>4 County do for a living?</p> <p>5 A. He work at a -- at a factory.</p> <p>6 Q. Which factory is it?</p> <p>7 A. I can't remember the name.</p> <p>8 Q. Okay. Is it in Macon County?</p> <p>9 A. No, it's in Lee County.</p> <p>10 Q. Okay. Do you have any</p> <p>11 information about the intent of the</p> <p>12 Legislature when it was drawing the 2023 map,</p> <p>13 which is Exhibit 6, after the Supreme Court's</p> <p>14 decision in this case?</p> <p>15 A. This is Exhibit 6, right</p> <p>16 (indicating)?</p> <p>17 Q. Yes.</p> <p>18 A. What's the Legislature's intent?</p> <p>19 Q. Right. Do you have any evidence</p> <p>20 about that?</p> <p>21 A. I don't have any evidence.</p> <p>22 Q. Are you aware that after the</p> <p>23 Legislature drew this map in 2023, Exhibit 6,</p>	<p style="text-align: right;">Page 97</p> <p>1 document and tell me if you've seen it</p> <p>2 before?</p> <p>3 A. Now, you said this is the map</p> <p>4 that the special master after they -- after</p> <p>5 the Supreme Court directed -- rejected --</p> <p>6 correct me if I'm wrong -- after the Supreme</p> <p>7 Court rejected previous map by the state --</p> <p>8 our state representative, state legislature?</p> <p>9 Q. So, in 2021, the Legislature drew</p> <p>10 a map.</p> <p>11 A. Uh-huh.</p> <p>12 Q. You sued and got a preliminary</p> <p>13 injunction.</p> <p>14 A. Right.</p> <p>15 Q. We appealed and went to the</p> <p>16 Supreme Court, which upheld the injunction.</p> <p>17 A. Uh-huh.</p> <p>18 Q. That meant a new map had to be</p> <p>19 drawn.</p> <p>20 A. That's right.</p> <p>21 Q. The Legislature then drew the</p> <p>22 2023 map.</p> <p>23 A. Uh-huh.</p>

<p style="text-align: right;">Page 98</p> <p>1 Q. You asked for another injunction.</p> <p>2 A. Uh-huh.</p> <p>3 Q. And the court -- the trial court</p> <p>4 agreed with you all that the 2023 map should</p> <p>5 not be used and appointed a special master --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- to recommend a map for the</p> <p>8 court to impose.</p> <p>9 The document that I have given</p> <p>10 you, Exhibit 7 --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- is the court's order saying</p> <p>13 we're giving the plaintiffs an injunction and</p> <p>14 state this is the map that we want the</p> <p>15 Secretary of State to use in the 2024</p> <p>16 elections.</p> <p>17 So, the last page is the map that</p> <p>18 the court imposed. It's one of the maps that</p> <p>19 the special master recommended.</p> <p>20 A. Uh-huh.</p>	<p style="text-align: right;">Page 100</p> <p>1 again, for someone to represent the people</p> <p>2 that are in line with my desires.</p> <p>3 Q. So, are you talking about the</p> <p>4 percentage of people in the district who are</p> <p>5 either Black residents or Black voting age</p> <p>6 residents?</p> <p>7 A. Right.</p> <p>8 Q. Like, Black citizens or Black</p> <p>9 voting age citizens?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Okay. Is there anything that you</p> <p>12 know of that you don't like about this map?</p> <p>13 A. I wish it was a higher</p> <p>14 percentage.</p> <p>15 Q. Okay. How high?</p> <p>16 A. At least fifty-one to fifty-two</p> <p>17 percent.</p> <p>18 Q. In CD 2, Congressional District</p> <p>19 2?</p> <p>20 A. Right. That's my personal</p> <p>21 desire.</p>
<p>21 Q. So, the -- you've got a long</p> <p>22 document here, which is the court agreeing to</p> <p>23 give you an injunction, and then, the map is</p> <p style="text-align: right;">Page 99</p> <p>1 at the end. Have you seen this document</p> <p>2 before?</p> <p>3 A. I believe I have. I'm sure I</p> <p>4 have.</p> <p>5 Q. And so, in this map, you would be</p> <p>6 in District 2; is that right?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. Does this map provide the relief</p> <p>9 that you wanted when you filed this -- does</p> <p>10 this map provide you with the relief you're</p> <p>11 currently seeking?</p> <p>12 MS. JASRASARIA: Objection to the</p> <p>13 extent it calls for a legal conclusion, but</p> <p>14 you may answer.</p> <p>15 A. I believe this is a better plan,</p> <p>16 a better map than the -- than the previous</p> <p>17 map.</p> <p>18 Q. (BY MS. MESSICK) What do you</p> <p>19 like about it? What makes it better?</p> <p>20 A. The percentage of average voting</p> <p>21 age. What that is, it has a better</p> <p>22 opportunity. Wish it was higher, numbers was</p> <p>23 higher. But it's a better opportunity,</p>	<p>22 Q. Do you have any views about how</p> <p>23 high the percentage needs to be in</p> <p style="text-align: right;">Page 101</p> <p>1 Congressional District 7?</p> <p>2 A. No, ma'am, I haven't thought</p> <p>3 about that.</p> <p>4 Q. Bill Cooper is the expert that</p> <p>5 your lawyers hired to draw illustrative</p> <p>6 maps --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- maps to try to prove their</p> <p>9 case to the court.</p> <p>10 He created an expert report and</p> <p>11 he has eight different maps in that report.</p> <p>12 Does that sound like something that you've</p> <p>13 seen before?</p> <p>14 A. No, ma'am.</p> <p>15 Q. If Alabama has two congressional</p> <p>16 districts in which Black voters form a</p> <p>17 majority, does that address your concerns</p> <p>18 even if the map is drawn in such a way that</p> <p>19 you don't live in either one of those</p> <p>20 districts?</p> <p>21 A. My own personal bias is that</p> <p>22 I will -- I want to be in a district that</p> <p>23 will be drawn for a Black district.</p>

<p style="text-align: right;">Page 102</p> <p>1 Q. Is it your goal in this 2 litigation to get another Democrat elected 3 from Alabama -- 4 A. Yes, ma'am. 5 Q. -- to Congress? 6 Do you believe that if the State 7 of Alabama can draw a congressional district 8 with a Black majority that it should do that? 9 A. Rephrase that, please, if you 10 don't mind. 11 Q. If Alabama -- if the numbers in 12 population are such that Alabama can draw a 13 Black district for Congress -- 14 A. Uh-huh. 15 Q. -- should it do that? 16 MS. JASRASARIA: Objection to the 17 extent it calls for a legal conclusion, but 18 you may answer. 19 A. I don't know how to answer that. 20 Q. (BY MS. MESSICK) Okay. If the 21 State of Alabama can draw a Black 22 congressional district, do you believe it's 23 required to do so?</p>	<p style="text-align: right;">Page 104</p> <p>1 Montgomery? 2 A. In Montgomery. 3 Q. Okay. 4 A. And then, she beat Bobby Bright. 5 I'm trying to go down the line. 6 One time, it was Terry Everett. I tell you 7 the truth, all that is embarrassing. 8 Q. Is it Barry Moore? 9 A. I think you're right. 10 Q. Okay. 11 A. That's it. I was trying to see a 12 picture of a sign. 13 Q. Have you ever contacted Barry 14 Moore for anything? 15 A. No, ma'am. 16 Q. Okay. 17 A. I contacted his office, not him. 18 Q. Okay. What did you contact his 19 office for? 20 A. I had some challenges with the VA 21 Medical Center. 22 Q. Did they help you? 23 A. They were supposed to get back.</p>
<p style="text-align: right;">Page 103</p> <p>1 MS. JASRASARIA: Same objection. 2 You may answer. 3 A. If -- what, now? Restate -- 4 Q. (BY MS. MESSICK) If the numbers 5 are such that Alabama can draw a Black 6 congressional district, do you believe it's 7 required to do so? 8 MS. JASRASARIA: Same objection. 9 A. I'm not that smart to say. 10 Q. (BY MS. MESSICK) That's fine. 11 Who represents you in Congress today? 12 A. Who represent me now? 13 Q. Yes, sir. 14 A. What's his name? Oh. Because he 15 don't come. And if he do come, he come to 16 the private country club. It was once -- 17 once, it was Bobby Bright. Then, I think -- 18 what's the young lady came? She became the 19 mayor. She was the city councilman in Union 20 Springs. I can't recall the name. 21 Q. Martha Roby? 22 A. Martha Roby. 23 Q. She was a city council member in</p>	<p style="text-align: right;">Page 105</p> <p>1 But VFW ended up coming -- stepping in. But 2 his office never did. 3 Q. Did you ever contact Martha 4 Roby's office? 5 A. Yes. 6 Q. What did you contact that office 7 for? 8 A. I contact her on several things 9 because I was chairman of the commission at 10 that time. 11 Q. What things do you remember? 12 A. Ma'am? 13 Q. What things do you remember 14 contacting Martha Roby's office about? 15 A. I can't remember in particular, 16 but I know I contacted all of them. I can 17 remember contacting -- because I remember 18 contacting her, but I can't remember 19 specifics. 20 Q. You said all of them. Did you 21 contact other members of Alabama's 22 Congressional delegation? 23 A. The 2nd Congressional District.</p>

<p style="text-align: right;">Page 106</p> <p>1 Q. Okay.</p> <p>2 A. Uh-huh.</p> <p>3 Q. Did your -- did you, then,</p> <p>4 contact Bobby Bright's office?</p> <p>5 A. Of course.</p> <p>6 Q. And was that again while you were</p> <p>7 chairman of the Bullock County --</p> <p>8 A. Right.</p> <p>9 Q. -- Commission?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Do you remember any of the things</p> <p>12 you contacted Bobby Bright's office about?</p> <p>13 A. I remember this one very, very</p> <p>14 well. It was a great, great experience.</p> <p>15 Terrible experience. Great experience, but</p> <p>16 it was a tragedy.</p> <p>17 We had a big flood that come</p> <p>18 through Union Springs. And FEMA said that in</p> <p>19 order -- we could get public assistance but</p> <p>20 not individual assistance. It must be at</p> <p>21 least one hundred homes. And I remember</p> <p>22 contacting Representative Bobby Bright,</p> <p>23 Congressman Bright, and was saying that I</p>	<p style="text-align: right;">Page 108</p> <p>1 pictures saying that I'm for it. It's</p> <p>2 just -- and it can go on and on and on.</p> <p>3 Q. What does the term "candidate of</p> <p>4 choice" mean to you?</p> <p>5 A. You know, I don't think I ever</p> <p>6 heard that word. If it was, it was another</p> <p>7 term. But exact candidate of choice, I never</p> <p>8 heard of that.</p> <p>9 Q. Several times today you've talked</p> <p>10 about wanting a district that is more</p> <p>11 amenable --</p> <p>12 A. Okay.</p> <p>13 Q. -- to electing somebody.</p> <p>14 What is it that you're looking</p> <p>15 for the district to do? What do you want --</p> <p>16 who do you want them to elect?</p> <p>17 A. District 2?</p> <p>18 Q. Uh-huh.</p> <p>19 A. Michael Figures.</p> <p>20 Q. You're going to have to settle</p> <p>21 for Shomari.</p> <p>22 A. Not Michael. Michael's his</p> <p>23 father.</p>
<p style="text-align: right;">Page 107</p> <p>1 didn't think that that number should be just</p> <p>2 in an ironclad one hundred, again, going back</p> <p>3 to the other. And he and I talked. He and I</p> <p>4 talked that day. The next day, it was</p> <p>5 approved.</p> <p>6 Q. So, the next day, you got the</p> <p>7 help that you needed?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. As you sit here today, can</p> <p>10 you think of any federal legislation that you</p> <p>11 wanted your representative to support that he</p> <p>12 or she did not support?</p> <p>13 A. Today's representative?</p> <p>14 Q. Any of them.</p> <p>15 A. They didn't support the</p> <p>16 Affordable Care Act.</p> <p>17 Q. You said they did or they did</p> <p>18 not?</p> <p>19 A. They didn't. They didn't support</p> <p>20 the Infrastructure Act, but they -- they'll</p> <p>21 take pictures of it when it's -- it's so</p> <p>22 hypocritical that you voted against it, but,</p> <p>23 then, when the money come, you're taking</p>	<p style="text-align: right;">Page 109</p> <p>1 Q. Yeah.</p> <p>2 A. Very personal.</p> <p>3 Q. Yeah.</p> <p>4 A. Thank you so much. I wish he was</p> <p>5 still alive with us, his dad. Shomari. I</p> <p>6 still -- I call him Mike, and he just smile.</p> <p>7 Q. Why do you support Shomari</p> <p>8 Figures?</p> <p>9 A. First of all, I think he's</p> <p>10 uniquely qualified. I think his DNA is</p> <p>11 very -- DNA is real. He know where the</p> <p>12 bathrooms are and he's super, super smart.</p> <p>13 And I think that he have the tenacity, the</p> <p>14 energy, and -- to be a representative of</p> <p>15 the -- not just District 2 but would make</p> <p>16 Alabama very proud. Go back to the bouquet</p> <p>17 of flowers. Although he's Afro descent. But</p> <p>18 I think that that bouquet would say that</p> <p>19 Alabama, we are no longer should be tied to</p> <p>20 Mississippi. Alabama's moving forward. Look</p> <p>21 what we have. We're sending our best and our</p> <p>22 bright to represent our state. And Shomari</p> <p>23 Figures, he epitomizes that.</p>

<p style="text-align: right;">Page 110</p> <p>1 Q. And when you said he knows where 2 the bathrooms are -- 3 A. Uh-huh. 4 Q. -- what do you mean by that? 5 A. He's been in DC working. He have 6 connections. He know people. And he have 7 gotten things done. That's important to me 8 that you know where the bathrooms are, 9 figuratively speaking. I don't mean 10 necessarily just the bathroom, bathroom. But 11 you know what doors to knock on. You have 12 made relationship with people, connection 13 that can get the job done. That's what I 14 mean. 15 Q. Okay. Do you know what it means 16 for elections to be racially polarized? 17 A. I don't quite understand that. 18 Q. Okay. Well, my question is, do 19 you know what that means, racially polarized? 20 A. No, ma'am, I don't. 21 Q. Okay. Do you know what a racial 22 campaign and an appeal -- a racial appeal in 23 a campaign is?</p>	<p style="text-align: right;">Page 112</p> <p>1 A. Let me leave that one alone. 2 Well, let's just -- let's just put the hay 3 down where the goats can eat it, okay? 4 Q. Yes. Thank you. 5 A. You have someone running -- 6 working -- running for an office in Alabama, 7 and they're saying -- they use the code word, 8 let's make America great again. Okay. Now, 9 from my perspective, we are -- what era are 10 you speaking of when they say that, make 11 America great again, because I think 12 America's still great. But the code word 13 that's being used for make America great 14 again, what do that mean to me, what it mean 15 to them that doing it, that are saying it? 16 They're saying, in other words, we need to be 17 white male dominated. And I -- and no 18 disrespect to anyone. But that's what that 19 word come back to me. 20 And then, women's rights be 21 damned. All those things -- pro life. If 22 you're pro life, you will have better 23 infrastructure so everyone's life would live</p>
<p style="text-align: right;">Page 111</p> <p>1 A. No, ma'am. 2 Q. Okay. Can you think of any 3 campaigns in the last twenty years or so in 4 Alabama -- 5 A. Uh-huh. 6 Q. -- where you feel like a 7 candidate is trying to appeal only to white 8 voters or only to Black voters? 9 A. A specific election? 10 Q. Yes, sir. 11 A. I can't just call off and say 12 House of Representative 47 or whatever. I 13 can't call that. But you could read the tea 14 leaves. 15 Q. Okay. Tell me more about. What 16 are you thinking of? 17 A. You can see who become the 18 benefactor, who benefit the most. And so -- 19 and then, the code words are used. 20 Politicians are very, very good in what they 21 do. 22 Q. What kinds of code words are you 23 talking about?</p>	<p style="text-align: right;">Page 113</p> <p>1 better versus pro birth. Pro life, you'll 2 make sure that that child is taken care of 3 from the cradle to the grave, you know. You 4 would make sure that we have affordable 5 healthcare. You would expand the Medicaid 6 expansion bill so that -- and even David 7 Bronner, University of Alabama, and all of 8 them have come back with the study saying 9 that it would -- it would benefit Alabama 10 more. So, these little bitty snippets leads 11 me to that conclusion. 12 Q. Who is David Bronner? 13 A. With the State of Alabama. I 14 think his position was the CEO. He's a big 15 financial guy. Like everything David Bronner 16 touch, it already say turn to gold. 17 Q. He's in charge of retirement -- 18 A. Retirement System -- 19 Q. -- of Alabama? 20 A. -- of Alabama. 21 Q. Okay. Are you registered to 22 vote? I know the answer but tell me for the 23 record.</p>

<p style="text-align: right;">Page 114</p> <p>1 A. Yes, and proudly.</p> <p>2 Q. When did you first register in</p> <p>3 Alabama?</p> <p>4 A. As soon as I became eligible.</p> <p>5 Q. Did you have problems registering</p> <p>6 when you became eligible?</p> <p>7 A. No, ma'am.</p> <p>8 Q. Okay. I imagine since you</p> <p>9 haven't moved in thirty years, you haven't</p> <p>10 updated your voter registration recently; is</p> <p>11 that fair? You've not had to update your</p> <p>12 voter registration?</p> <p>13 A. Oh, no, I haven't had to, no,</p> <p>14 ma'am.</p> <p>15 Q. Okay. Is your wife a registered</p> <p>16 voter?</p> <p>17 A. I wish you would meet my wife,</p> <p>18 because she runs it.</p> <p>19 Q. I had a feeling that was the</p> <p>20 answer.</p> <p>21 Are you aware of any problems</p> <p>22 that she's had registering to vote?</p> <p>23 A. No problem.</p>	<p style="text-align: right;">Page 116</p> <p>1 registering her?</p> <p>2 A. No. My mom registered to vote as</p> <p>3 soon as she became eligible. My mom and my</p> <p>4 father pushed us to vote.</p> <p>5 Q. Are you aware that you can</p> <p>6 register to vote in Alabama online?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. Okay. Do you encourage people to</p> <p>9 do that?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. How often do you vote?</p> <p>12 A. Every election.</p> <p>13 Q. Do you generally vote in</p> <p>14 run-offs, too?</p> <p>15 A. Every election.</p> <p>16 Q. Special elections?</p> <p>17 A. Every election.</p> <p>18 Q. Okay. Where is your current</p> <p>19 polling place?</p> <p>20 A. What we call the Richard Stone</p> <p>21 building. It's an old armory in Union</p> <p>22 Springs.</p> <p>23 Q. Is it conveniently located for</p>
<p style="text-align: right;">Page 115</p> <p>1 Q. To the best of your knowledge,</p> <p>2 are your adult children registered to vote?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Are you aware of any problems</p> <p>5 that they have registering to vote?</p> <p>6 A. No, ma'am.</p> <p>7 Q. Do you ever help other people</p> <p>8 register to vote?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. How do you go about doing that?</p> <p>11 A. Setting up booths at the</p> <p>12 different events and speaking to various</p> <p>13 organizations and to youth through church. I</p> <p>14 use -- I don't -- Lord, forgive me. I don't</p> <p>15 use the church. I let -- I let the church</p> <p>16 use me to be an advocate for register to</p> <p>17 vote.</p> <p>18 Q. In addition to encouraging people</p> <p>19 to register to vote, do you actually help</p> <p>20 anybody complete the paperwork or go through</p> <p>21 the process?</p> <p>22 A. I did for my mom.</p> <p>23 Q. Okay. Did you have any problems</p>	<p style="text-align: right;">Page 117</p> <p>1 you?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Is the polling place open when</p> <p>4 you appear to vote?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Have you ever had problems voting</p> <p>7 in person at that polling place?</p> <p>8 A. No, ma'am.</p> <p>9 Q. Do you know the poll workers?</p> <p>10 A. Union Springs' small. We know</p> <p>11 everybody.</p> <p>12 Q. Okay. Do you ever vote absentee?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. How often do you do that?</p> <p>15 A. Since I started having health</p> <p>16 challenges, I go and vote -- go to the</p> <p>17 circuit clerk's office and vote in person</p> <p>18 absentee because I don't know will I -- will</p> <p>19 I be sick and unable. And I'm a senior</p> <p>20 citizen now, thank God. So, I can go up</p> <p>21 there and vote.</p> <p>22 Q. Do you have -- do you have any</p> <p>23 problems voting absentee?</p>

<p style="text-align: right;">Page 118</p> <p>1 A. No, ma'am.</p> <p>2 Q. Are you aware of any problems</p> <p>3 that your wife has voting in person or</p> <p>4 absentee?</p> <p>5 A. Oh, she love going to the poll</p> <p>6 because she love to be out socializing.</p> <p>7 Q. Okay. Are you aware of any</p> <p>8 problems that your adult children have had</p> <p>9 voting either in person or absentee?</p> <p>10 A. No, ma'am.</p>	<p style="text-align: right;">Page 120</p> <p>1 qualified candidates?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Okay. Were there any policy</p> <p>4 differences that come to mind right now?</p> <p>5 A. Well, one particular -- I know</p> <p>6 because I had served with him on city</p> <p>7 council. And he's very fiscal sound. And I</p> <p>8 didn't want him to be removed because I know</p> <p>9 that he go -- he was -- he will squeeze the</p> <p>10 dollar to the eagle. He's just a stickler</p> <p>11 for that.</p>
<p>11 Q. When you're deciding which</p> <p>12 candidate you personally support, is race a</p> <p>13 significant consideration?</p> <p>14 A. Not all the time.</p> <p>15 Q. Is it sometimes?</p> <p>16 A. Yes, it has been. But what we</p> <p>17 do -- I belong to an organization that for</p> <p>18 local candidates, we have a forum. And we</p> <p>19 actually vet them. And I vote to the one</p> <p>20 that, like, I know I'm going to vote for the</p> <p>21 next twenty years.</p> <p>22 Q. What is this organization that</p> <p>23 has the forum?</p>	<p>12 Q. Okay. Have you ever worked at a</p> <p>13 polling place in Alabama on election day?</p> <p>14 A. When I was a little boy, I was</p> <p>15 a -- like I said, I was about twelve years</p> <p>16 old, I was a poll watcher, poll observer when</p> <p>17 Thomas Reed and Fred Gray was elected in</p> <p>18 1970.</p> <p>19 Q. Do you remember there being any</p> <p>20 problems at the polls that day?</p> <p>21 A. Oh, yes. Scars. I can tell you</p> <p>22 some scars but -- and it was -- it was</p> <p>23 expected, and we was well schooled how to</p>
<p style="text-align: right;">Page 119</p> <p>1 A. We're adjunct of Alabama New</p> <p>2 South. It's called the Bullock County Voters</p> <p>3 League.</p> <p>4 Q. Bullock County what?</p> <p>5 A. Voters League.</p> <p>6 Q. Okay. And so, Alabama New South</p> <p>7 is kind of like the alternative to the</p> <p>8 Alabama Democratic Conference; is that right?</p> <p>9 A. Well, people say that, but</p> <p>10 Alabama New South is a nonpartisan. It's a</p> <p>11 nonpartisan organization where the ADC is a</p> <p>12 partisan.</p> <p>13 Q. Okay.</p>	<p style="text-align: right;">Page 121</p> <p>1 respond. You know, they'll come out and -- I</p> <p>2 guess you call them polling inspectors would</p> <p>3 come out and actually bring the tape to make</p> <p>4 sure you're thirty feet away from the poll,</p> <p>5 and you're about two hundred feet away from</p> <p>6 the poll. And you was dealt those type of --</p> <p>7 what's supposed to be intimidating tactics.</p> <p>8 But it -- we was -- we was well schooled to</p> <p>9 just smile --</p> <p>10 Q. Okay.</p> <p>11 A. -- and continue to do what you</p> <p>12 do.</p>
<p>14 A. And when I said that, Blacks</p> <p>15 and -- sometimes I vote for Blacks. And I've</p> <p>16 voted for several European Americans over</p> <p>17 Afro-Americans in my town because their</p> <p>18 platform was more in line with my platform</p> <p>19 and my desire.</p> <p>20 Q. And what kinds of issues was it</p> <p>21 that you agreed with those white candidates?</p> <p>22 A. Qualifications.</p> <p>23 Q. You thought they were more</p>	<p>13 Q. Have you worked at a polling</p> <p>14 location on election day since then?</p> <p>15 A. No, because most of the time,</p> <p>16 I've been a candidate.</p> <p>17 Q. Okay. Do you ever help people</p> <p>18 actually vote on election day?</p> <p>19 A. I have.</p> <p>20 Q. Can you think of any problems</p> <p>21 that you've had when you've done that?</p> <p>22 A. No, ma'am.</p> <p>23 Q. How long have you been a member</p>

<p style="text-align: right;">Page 122</p> <p>1 of the Alabama Democratic Party?</p> <p>2 A. I moved back here, I think it</p> <p>3 was -- I think either '87 or '88 when I</p> <p>4 joined.</p> <p>5 Q. And how long have you been</p> <p>6 associated with the Bullock County Democratic</p> <p>7 Party?</p> <p>8 A. Same time. I'm a member of both</p> <p>9 organizations.</p> <p>10 Q. And I know you've mentioned that</p> <p>11 you were the chairman of the Bullock County</p> <p>12 Democratic Executive Committee, right?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. When did you serve in that role?</p> <p>15 A. You know what? I can't tell you</p> <p>16 exact date because I told you when I had some</p> <p>17 medical challenges, I stepped away from both</p> <p>18 of them. So, I believe I served -- I know I</p> <p>19 served through two, maybe three elections,</p> <p>20 but the years are fuzzy.</p> <p>21 Q. Okay. Do you -- did you hold any</p> <p>22 other roles with the Bullock County</p> <p>23 Democratic Party?</p>	<p style="text-align: right;">Page 124</p> <p>1 A. Because their belief mirrors</p> <p>2 mine.</p> <p>3 Q. (BY MS. MESSICK) You said you</p> <p>4 have in the past, at times, voted for a white</p> <p>5 candidate over a Black candidate. Have you</p> <p>6 ever voted for a Republican over a Democrat?</p> <p>7 A. Yes, I have.</p> <p>8 Q. Do you do that often?</p> <p>9 A. Not anymore.</p> <p>10 Q. Has something changed?</p> <p>11 A. Right. Once you join the</p> <p>12 Democratic Party, you sign a pledge that you</p> <p>13 will support the Democratic ticket. And I</p> <p>14 take the oath very serious. I voted for</p> <p>15 Ronald Reagan because I was in the Army, and</p> <p>16 he offered us a large raise. And I voted for</p> <p>17 the white guy for city council because city</p> <p>18 council is a nonpartisan.</p> <p>19 Q. Okay. But since you've been a</p> <p>20 member of the Democratic Party, you do not</p> <p>21 vote for Republicans?</p> <p>22 A. I'm very loyal to the Democratic</p> <p>23 Party.</p>
<p style="text-align: right;">Page 123</p> <p>1 A. Before I became the chairman, I</p> <p>2 was a board member.</p> <p>3 Q. And do you remember approximately</p> <p>4 how long you served in that role?</p> <p>5 A. I don't.</p> <p>6 Q. Okay. Have you ever held a</p> <p>7 leadership role with the state Democratic</p> <p>8 Party?</p> <p>9 A. No, ma'am.</p> <p>10 MS. MESSICK: Let's take a brief</p> <p>11 break.</p> <p>12</p> <p>13 (Whereupon, a brief recess was</p> <p>14 taken.)</p> <p>15</p> <p>16 MS. MESSICK: Let's go back on</p> <p>17 the record.</p> <p>18 Q. Why do you associate with the</p> <p>19 Democratic Party?</p> <p>20 MR. WALKER: I'm sorry. I</p> <p>21 couldn't hear that.</p> <p>22 MS. MESSICK: Why do you</p> <p>23 associate with the Democratic Party?</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. Okay. Have you ever considered</p> <p>2 yourself a member of the Republican Party?</p> <p>3 A. I was asked, believe it or not, a</p> <p>4 couple years -- when I was chairman, a couple</p> <p>5 years ago, a gentleman asked me to consider</p> <p>6 becoming a Republican. And I thought it was</p> <p>7 very flattering. He's a great southern</p> <p>8 gentleman. And I considered that as</p> <p>9 flattering.</p> <p>10 Q. And did you turn him down?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. Who was it who asked you?</p> <p>13 A. His name was Ellison Barnett.</p> <p>14 He's passed on now, an older gentleman. And</p> <p>15 he was saying that -- he said, you're doing</p> <p>16 such a great job as chairman. He said, I</p> <p>17 have the resources that we could -- that we</p> <p>18 could send you to the state or national if</p> <p>19 you would become a Republican. I told him I</p> <p>20 just wanted to be the best chairman county</p> <p>21 commissioner I could be.</p> <p>22 Q. Was he white or Black?</p> <p>23 A. He's white.</p>

Page 126

1 Q. When did you first run for city
2 council?
3 A. I think in '88. Yeah.
4 Q. And how long is the city council
5 term?
6 A. Four years.
7 Q. And you served two terms?
8 A. Right, but they were split.
9 Q. Okay.
10 A. Because I won -- I think I lost
11 in '88, and I won in '92. But I -- and I
12 lost the next term, and then, I came back and
13 won. I can't remember all them numbers.
14 Q. Okay. So, two separate --
15 A. Two separate --
16 Q. Two terms separated?
17 A. Two -- but not -- in the middle
18 of the second term, I was appointed to finish
19 out the term as chairman. So, I had to
20 resign from city council.
21 Q. Okay. And you may have already
22 told me but remind me. Who appointed you to
23 the Bullock County Commission as chairman?

Page 127

1 A. Governor Don Siegleman.
2 Q. And he's a Democrat?
3 A. Oh, yeah.
4 Q. And he's white?
5 A. Yes.
6 Q. Then, you told me earlier that
7 you had been on the Bullock County Commission
8 for seventeen years, correct?
9 A. Uh-huh. Uh-huh.
10 Q. And that's seventeen consecutive
11 years?
12 A. Yes, ma'am.
13 Q. And then, you medically retired
14 from that position?
15 A. Yes, ma'am.
16 Q. Who was appointed to replace you?
17 A. Judge Theresa Daniel.
18 Q. And who is she?
19 A. She's a very sweet lady about
20 this tall (indicating), a white lady in Union
21 Springs. She was appointed by Kay Ivey.
22 Q. Does she still hold that position
23 today?

Page 128

1 A. No. She just wanted to finish
2 out the term and she didn't seek reelection.
3 Q. Who is chairman now?
4 A. Alonza Ellis.
5 Q. And is he a Democrat?
6 A. Yes, ma'am.
7 Q. And is he Black?
8 A. Yes, ma'am.
9 Q. When you ran for city council,
10 did the Democratic Party support you at all?
11 A. Well, like I said, the Democratic
12 Party don't get involved in municipal
13 elections.
14 Q. When you have run for Bullock
15 County Commission --
16 A. Uh-huh.
17 Q. -- did the Democratic Party
18 support you?
19 A. Yes, ma'am.
20 Q. Did they provide any kind of
21 tangible support? Did they provide money or
22 volunteers or resources of any kind?
23 A. Yes, they did.

Page 129

1 Q. What did they provide?
2 A. Helped me with some gas to drive
3 a car and they have sponsored events, you
4 know, the get out and vote event, things like
5 that.
6 Q. Okay. Is there anything else you
7 can think of that they did to support you?
8 A. That they what?
9 Q. That they did -- that the Alabama
10 Democratic Party did --
11 A. Oh, the Alabama.
12 Q. -- to support you.
13 A. I thought you said the Democratic
14 Party. I thought you were speaking of the
15 local Bullock County Democratic Party.
16 Q. Okay. I'm sorry.
17 A. Okay. But, now, the state
18 Democratic Party, I don't know that they --
19 they haven't given anything to Bullock County
20 Democratic Party. But I don't know anywhere
21 else. But the state, no, I didn't receive
22 any funding from them.
23 Q. Okay. So, the county Democratic

Page 130

1 Party supported your elections?
 2 A. Right.
 3 Q. Helped you with that, but the
 4 state Democratic Party may not -- did not?
 5 A. No. Huh-uh.
 6 Q. Do you plan to run for office in
 7 the future?
 8 A. No, ma'am.
 9 Q. Okay. And is that solely because
 10 you had to medically retire and you continue
 11 to have those health issues?
 12 A. Health and my children and my
 13 wife would not allow it, so --
 14 Q. Have you been involved in
 15 political campaigns for other candidates?
 16 A. Oh, yes.
 17 Q. Which ones? Which candidates?
 18 A. Since 1970, I've been involved
 19 with so many campaigns.
 20 Q. So, 1970 is before Reagan. Were
 21 any of those campaigns for Republicans?
 22 A. No. I remember in the 1970s, as
 23 I mentioned, Fred Gray, Thomas Reed, and

Page 131

1 local candidates in the -- in the county.
 2 Q. Did you ever get involved in
 3 statewide campaigns?
 4 A. Other than -- other than
 5 supporting the Democratic ticket.
 6 Q. Do you -- other than being
 7 supportive in principle of the state
 8 Democratic ticket, do you do anything to
 9 support those candidates in terms of actually
 10 knocking on doors, hosting events, providing
 11 money, anything like that?
 12 A. I have given before money. And I
 13 use a lot of human capital and, like, putting
 14 up signs and going around houses door to door
 15 and passing out brochures and things like
 16 that.
 17 Q. Did you ever take the candidates
 18 around to meet people in Bullock County?
 19 A. Yes, I have.
 20 Q. Have you ever supported
 21 candidates in nonpartisan elections like
 22 municipal elections?
 23 A. Yes.

Page 132

1 Q. Have you ever gone out and
 2 actively supported through the sorts of
 3 things we're talking about, money or time or
 4 other resources, white candidates?
 5 A. Yes.
 6 Q. Did you support Doug Jones when
 7 he ran for United States --
 8 A. Yes.
 9 Q. -- Senate?
 10 A. Uh-huh.
 11 Q. Did you support him when he ran
 12 for reelection?
 13 A. Yes.
 14 Q. Who are the current leaders of
 15 the Alabama Democratic Party?
 16 A. Dr. Joe Reed.
 17 Q. Anybody else?
 18 A. I talked to her the other day.
 19 She's the vice chair. She ran for the Second
 20 Congressional District.
 21 Q. Are you trying to think of
 22 Tabitha Isner?
 23 A. Tabitha.

Page 133

1 Q. Are there any other leaders of
 2 the Alabama Democratic Party who come to
 3 mind?
 4 A. Not off the top of my head.
 5 Q. What race is Dr. Reed?
 6 A. He's Afro-American.
 7 Q. And what about Tabitha Isner?
 8 A. She's a European America.
 9 Q. Are you aware of any leadership
 10 struggles the Alabama Democratic Party has
 11 had in recent years?
 12 A. Very.
 13 Q. What can you tell me about that?
 14 A. I think it's just different
 15 philosophy and -- but I guess in any family,
 16 you will have some dysfunction.
 17 Q. What is your perception of the
 18 strength of the Alabama Democratic Party
 19 right now?
 20 A. It's a core belief.
 21 Q. I don't understand. Is the party
 22 strong?
 23 A. I think they are. I think

<p style="text-align: right;">Page 134</p> <p>1 they're stronger than what they think they 2 are. When I say the core belief, I think 3 that they believe in people, or else I 4 wouldn't be a part of it. 5 Q. Is the Alabama Democratic Party 6 doing a good job of fielding candidates for 7 statewide offices? 8 A. I don't think that that's the -- 9 that's the -- the state Democratic Party 10 is -- I don't think that is. I don't -- 11 again, I'm not in the room where the sausage 12 is being made. I think if the -- I think 13 that the individual, that's my belief, should 14 want it because it have to be borne in their 15 belly. And then, I think the Democratic 16 Party should vet each one of them, interview 17 them, and choose it rather than, as I stated 18 before, I don't think no organization should 19 choose a leader. Let the people choose the 20 leader. I don't think no organization should 21 choose their voters. Let the voters choose 22 the leader. So, all that goes together. 23 Q. Does the Alabama Democratic Party</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. Okay. Do you know who Wendell 2 Major is? 3 A. No, ma'am. 4 Q. Okay. Has there ever been a time 5 where you wanted to be more active with the 6 Alabama -- with the Alabama Democratic Party 7 or the county Democratic Party and there were 8 barriers put up that prevented you from being 9 involved with the Democratic Party? 10 A. Nothing but my personal injury -- 11 illness. 12 Q. Okay. Do you think that in 13 Alabama white people are welcome to be 14 Democrats? 15 A. Do what, now? 16 Q. In Alabama, are white people 17 welcome to be Democrats? 18 A. Oh, the tenure is open for 19 everybody. Please join us. 20 Q. What thoughts do you have on Vice 21 President Kamala Harris leading the 22 Democratic ticket? 23 A. I think she's uniquely qualified.</p>
<p style="text-align: right;">Page 135</p> <p>1 have any responsibility to recruit candidates 2 for office? 3 A. Well, it depends on your word 4 "recruited". Do they go out and say, John, I 5 want you to run, John, I want you to run? I 6 think they do more or less reminding people 7 of the election is coming, let them know 8 that -- the qualifications for coming. Now, 9 that's my part of recruiting and that -- 10 that's it. 11 Q. Have you ever encouraged somebody 12 to run for office in your role as the -- in 13 your role as the Bullock County Democratic 14 Party? 15 A. No, ma'am. 16 Q. Have you ever encouraged somebody 17 to run for office outside that role? 18 A. No, ma'am. 19 Q. Do you know who Yolanda Flowers 20 is? 21 A. That name sound very familiar, 22 very familiar. I know that name, but I 23 can't --</p>	<p style="text-align: right;">Page 137</p> <p>1 Q. Do you think she will get a 2 different reception in Alabama than Joe Biden 3 would have? 4 A. Yes. 5 Q. And why? 6 A. The last couple of days have 7 shown that. 8 Q. What do you mean? 9 A. Energized. 10 Q. Okay. 11 A. She will energize the party. 12 Q. It seems to me that she's 13 energizing young people, women, and Black 14 voters. Is that your perception? 15 A. No. 16 Q. What is your perception? 17 A. I think she's energizing -- well, 18 you look at Nikki Haley group -- 19 Q. Okay. 20 A. -- endorsed Kamala Harris. 21 Yes, Nikki Haley. Nikki Haley, 22 who ran for president, who she endorsed 23 Trump, but her organization have come out --</p>

Page 138

1 after Kamala Harris accepted the challenge to
 2 run, her group have joined in the -- to
 3 support the Vice President.
 4 Q. Who else is energized by Vice
 5 President Harris --
 6 A. I think --
 7 Q. -- being a presidential
 8 candidate?
 9 A. -- some of the -- a lot of
 10 Independents, a lot of Republicans who have
 11 been energized.
 12 Q. Do you know whether it's true in
 13 Alabama today that most Black voters vote for
 14 Democrats?
 15 A. Yes, it is.
 16 Q. Do you know if that is also true
 17 nationally, that Black voters support
 18 Democrats?
 19 A. Yeah. But, now, we're not
 20 monolithic, you know. So, what you're saying
 21 most -- you did say most.
 22 Q. Do you know who your state
 23 senator is?

Page 139

1 A. Yes.
 2 Q. And who is it?
 3 A. Billy Beasley.
 4 Q. And is he a Democrat?
 5 A. Yes, ma'am.
 6 Q. And he's white?
 7 A. He's white.
 8 Q. Do you know who your state house
 9 member is?
 10 A. Yes.
 11 Q. And who is he?
 12 A. Berry Forte.
 13 Q. And do you know how to spell
 14 Berry?
 15 A. Ma'am?
 16 Q. Do you know how he spells Berry?
 17 A. I spell it B-a-r-r-y. Some
 18 people have spelled it B-e-r-r-y.
 19 Q. Okay. Who's the mayor of Union
 20 Springs?
 21 A. Roderick Clark.
 22 Q. What race is he?
 23 A. Black.

Page 140

1 Q. How many members of the County
 2 Commission are there in Bullock County right
 3 now?
 4 A. There's four and a chairman.
 5 Q. Okay. And do you know who the
 6 members of the chairman are?
 7 A. Yeah.
 8 Q. And what race is each one?
 9 A. We have -- the chairman is Black,
 10 and we have three Black and one white.
 11 Q. For the members?
 12 A. Yes, ma'am.
 13 Q. How many members of the city
 14 council are there in Union Springs?
 15 A. There's a mayor and four.
 16 Q. What race is the mayor?
 17 A. All Black.
 18 Q. Okay. Who's your sheriff?
 19 A. Raymond Rogers.
 20 Q. And is he Black or white?
 21 A. Yes. Black.
 22 Q. Black. And do you know who your
 23 probate judge is?

Page 141

1 A. Yes.
 2 Q. And who is that?
 3 A. Tatum, James Tatum.
 4 Q. And he's Black?
 5 A. He's Black.
 6 Q. Do you know who your circuit
 7 clerk is?
 8 A. Yes.
 9 Q. And who is she?
 10 A. Rashawn Faniel. Rashawn Faniel
 11 Harris now.
 12 Q. How do you spell Faniel?
 13 A. F-a-n-i-e-l.
 14 Q. Okay. And is Ms. Harris Black?
 15 A. That's the same person, I
 16 remember. Her maiden name was Faniel.
 17 Q. Right.
 18 A. Faniel Harris. Uh-huh. Yeah.
 19 She's Black.
 20 Q. Okay. Do you know if white
 21 voters in Alabama usually prefer Republican
 22 candidates?
 23 A. Yes, ma'am.

Page 142

1 Q. Do you know why?
 2 A. Barry Goldwater sweep.
 3 Q. Tell me more.
 4 A. You know the story. It happened
 5 during the Barry Goldwater sweep.
 6 Q. Tell me what you mean by that.
 7 A. This is a very deep dialogue, so
 8 I'll just say the Barry Goldwater sweep and
 9 leave it alone because at that time -- I'll
 10 just leave it alone.
 11 Q. Well, I don't -- everybody
 12 doesn't see everything the same way.
 13 A. That's right.
 14 Q. And I'm trying to understand how
 15 you see it.
 16 A. Yes, ma'am.
 17 Q. Can you give me just the
 18 two-minute overview?
 19 A. I mean, it was nothing wrong with
 20 it. I'm not saying anything wrong with it.
 21 But that's when the dynamic changed, during
 22 the Barry Goldwater sweep.
 23 Q. Was it a race-based sweep?

Page 143

1 A. I think it was more ideals at
 2 that time because the Republican Party used
 3 to be Black. Blacks was mostly Republicans,
 4 but it flipped.
 5 Q. Do you know why white voters in
 6 Alabama who support Republicans, why they
 7 choose to support Republicans?
 8 A. I can't answer that. I'm not
 9 white.
 10 Q. Okay. In the last twenty years,
 11 can you think of any barriers that you've
 12 experienced to fully participate in the
 13 political process in Alabama, setting aside
 14 your own health conditions?
 15 A. Not me.
 16 Q. Are you aware of other people
 17 experiencing barriers during that time?
 18 A. I can't recall.
 19 Q. Okay. Do you have information
 20 that we've not already discussed today that
 21 concerns voting-related discrimination that
 22 originates with the government here in
 23 Alabama?


Page 144

1 A. Say again. I didn't quite hear
 2 you.
 3 Q. Do you have information we
 4 haven't already discussed today about
 5 discrimination in voting? And I'm only
 6 interested in discrimination that originates
 7 with the government.
 8 A. Shelby versus Holder.
 9 Q. Are there any voting practices
 10 that you believe Alabama has used to
 11 discriminate against Black voters?
 12 A. Yes.
 13 Q. And what are those?
 14 A. Look at incarceration and the
 15 impediment for a person to receive their
 16 rights back. And we know that the -- that
 17 the -- that the percentage of people
 18 incarcerated are mostly Black men. They have
 19 the higher percentage. And there are certain
 20 numbers, but the highest percentage. So that
 21 you get your rights restored, there's too
 22 many hoops to go to. And we should make it
 23 more friendlier for people to get their right

Page 145

1 restored.
 2 Q. Are there any other voting
 3 practices that you believe Alabama has used
 4 to discriminate against Black voters?
 5 A. I can't think of them, but I know
 6 that there are -- right now, I can't think.
 7 Q. Are there ways that the State of
 8 Alabama has been unresponsive to your needs
 9 as a Black citizen?
 10 A. Say again.
 11 Q. Are there ways that the State of
 12 Alabama has been unresponsive to your needs
 13 as a Black citizen?
 14 A. Yes.
 15 Q. And what are those?
 16 A. Resources and opportunity to be a
 17 true part of the American dream.
 18 Q. What do you mean by resources?
 19 A. Well, the way that I was brought
 20 up was limited resources. I couldn't go to
 21 the library. Serious. I couldn't go to the
 22 public library. I jumped in a swimming pool
 23 that was owned by the city as a child and was

<p style="text-align: right;">Page 146</p> <p>1 almost arrested. So, that -- those type of 2 things really get to you, you know. And 3 these are accommodational things like that. 4 When I was in school, until 1970, we only had 5 one microscope. Can you imagine having one 6 microscope for the entire high school? You 7 had two Olivetti typewriters, those little 8 nonelectric. You had used books, rundown 9 furniture. 10 We had to walk to school because 11 there was very -- there was only a couple 12 buses. Cold buildings, no -- lack of heat. 13 And so, that -- and then, you also -- you -- 14 sometimes some kids had to drop out of school 15 because their parents wasn't making enough to 16 survive. 17 So, I could go down a litany of 18 things, but I'm not. But those are your 19 formative years that shape who you are today. 20 And that's why I joined the military rather 21 than going directly to college. I could have 22 easily went to college. I think I had a 23 great GPA. I made very high on the SAT and</p>	<p style="text-align: right;">Page 148</p> <p>1 better opportunity than a lot of people, 2 Blacks and white. But you have to go even 3 further back, not just with my age. Go back 4 to his granddaddy, his great granddaddy, you 5 know, and the sacrifices that they had to 6 make. 7 So, that's what I'm saying. So, 8 it's not just Shomari. His DNA can align 9 with my DNA. He know the struggles that his 10 father, who was a Civil Rights worker, you 11 know. 12 Q. Uh-huh. Are there ways that you 13 feel like the State of Alabama has been 14 unresponsive to your needs in the last twenty 15 years? 16 A. Access -- easy access to 17 healthcare. We're living in a world of AI, 18 broadband accessibility so that our youth -- 19 it'll affect all of us, even my European 20 brothers and sisters, because we're all 21 Americans. We're all Alabamians. If one 22 child or a couple of children are crippled, 23 it hurt all of us.</p>
<p style="text-align: right;">Page 147</p> <p>1 ACT. But I said I'm going to go to the 2 military and then go to college because I 3 had -- my mom and my father divorced. So, I 4 had to help my mom being the oldest boy. 5 Q. Uh-huh. 6 A. So, I had to put my education 7 off. Now, these things may sound minute, 8 unimportant, but I hold them very dear and 9 near to me. So, those are things that when I 10 say that's someone who look like me who had 11 experienced the things that I had to go 12 through would be more amenable to our needs. 13 Q. So, you're talking about your 14 formative years? 15 A. Uh-huh. 16 Q. But you were born in 1954. So, 17 you turned seventy this year, right? 18 A. Uh-huh. 19 Q. Shomari Figures is half your age. 20 A. Absolutely. 21 Q. And you know his parents? 22 A. I know his father and I know his 23 mother. And, yes, he have a -- he have had a</p>	<p style="text-align: right;">Page 149</p> <p>1 So, yes, in the last twenty 2 years, those infrastructure -- our 3 transportation corridor and all those things. 4 And please let me just breathe for a second. 5 Q. Yes, sir. 6 A. I'm okay. I'm sorry I get a 7 little emotional. 8 Q. That's okay. 9 A. Please don't take anything that I 10 say personal. 11 Q. Thank you. 12 A. Please don't. 13 Q. And I'm sorry to have caused 14 that. 15 A. No, you didn't. You just woke up 16 what's in me. And that's why that I am a 17 plaintiff because -- 18 Q. Yes, sir. As we sit here today, 19 is there anything that you feel like you 20 would want to tell the court that we haven't 21 already talked about? 22 A. I think our legal representatives 23 are doing a yeoman's job and they speak for</p>

<p style="text-align: right;">Page 150</p> <p>1 me and for the rest of us. And I just want 2 to -- and I want to thank you all for being 3 accommodating also here today. And I think 4 it's very helpful to our law. And I just 5 wish the best for this world. 6 Q. I thank you for that. I'm 7 thinking about you do have a lot of lawyers 8 who are doing a great job. They're making a 9 lot of arguments. They'll probably file 10 more -- they'll file more documents. But at 11 the actual trial, if you are put up on the 12 stand to testify and tell the court what you 13 have to contribute to the case, are there 14 things that, as you sit here now, you think 15 you'd want to tell the court that we haven't 16 already talked about here today? 17 A. I still leave it to my attorneys, 18 and I'm sure that they -- that they'll 19 properly represent our case. 20 Q. Okay. 21 MS. MESSICK: I don't have any 22 questions. 23 Dorman, do you have any questions</p>	<p style="text-align: right;">Page 152</p> <p>1 THE WITNESS: My pleasure. 2 MS. MESSICK: We're off the 3 record. 4 FURTHER DEPONENT SAITH NOT. 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23</p>
<p style="text-align: right;">Page 151</p> <p>1 for your client? 2 MR. WALKER: I have no further 3 questions. Thank you for coming in today, 4 sir. 5 MS. MESSICK: Thank you. Your 6 lawyer or one of the other plaintiff's 7 lawyers might have questions. 8 MS. JASRASARIA: No questions for 9 me. 10 MS. MESSICK: Do the Singleton 11 plaintiffs have questions? 12 MR. PENN: This is Attorney Myron 13 Penn, and we do not have any questions. 14 Thank you. 15 MS. MESSICK: Do the Milligan 16 plaintiffs have any questions? 17 MS. SADASIVAN: Hi. No, the 18 Milligan plaintiffs don't have any questions. 19 Thank you so much for your time. 20 MS. MESSICK: Thank you, Mr. 21 Smith, for being here today and for patiently 22 answering my questions. I appreciate it. I 23 enjoyed meeting you.</p>	<p style="text-align: right;">Page 153</p> <p>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 MICHELLE L. PARVIN 19 Certified Court Reporter 20 License Number 126 21 Commission expires 9/30/24 22 Notary Public expires 1/26/26 23</p>

<p style="text-align: right;">Page 154</p> <p>1 To: Jyoti Jasrasaria, Esq. 2 Re: Signature of Deponent Ronald Smith 3 Date Errata due back at our offices: 30 days 4 5 Greetings: 6 This deposition has been requested for read and sign by the deponent. It is the deponent's responsibility to 7 review the transcript, noting any changes or corrections on the attached PDF Errata. The deponent may fill 8 out the Errata electronically or print and fill out manually. 9 10 Once the Errata is signed by the deponent and notarized, please mail it to the offices of Veritext (below). 11 12 When the signed Errata is returned to us, we will seal and forward to the taking attorney to file with the 13 original transcript. We will also send copies of the Errata to all ordering parties. 14 15 If the signed Errata is not returned within the time above, the original transcript may be filed with the 16 court without the signature of the deponent. 17 18 Please Email the completed errata/witness cert page to CS-SOUTHEAST@VERITEXT.COM 19 or mail to 20 Veritext Production Facility 21 2000A Southbridge Parkway, Suite 400 22 Birmingham, AL 35209 23 800-808-4958</p>	<p style="text-align: right;">Page 156</p> <p>1 Page ____ Line ____ Change ____ 2 ____ 3 Reason for change ____ 4 Page ____ Line ____ Change ____ 5 ____ 6 Reason for change ____ 7 Page ____ Line ____ Change ____ 8 ____ 9 Reason for change ____ 10 Page ____ Line ____ Change ____ 11 ____ 12 Reason for change ____ 13 Page ____ Line ____ Change ____ 14 ____ 15 Reason for change ____ 16 ____ 17 18 _____ DEPONENT'S SIGNATURE 19 Sworn to and subscribed before me this ____ day of 20 _____, _____. 21 _____ 22 23 NOTARY PUBLIC / My Commission Expires: _____</p>
<p style="text-align: right;">Page 155</p> <p>1 ERRATA for ASSIGNMENT #6776826 2 I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that 3 4 ____ There are no changes noted. 5 ____ The following changes are noted: 6 Pursuant to Civil Procedure, Rule 30. ALA. CODE § 5-30(e) 7 (2017). Rule 30(e) states any changes in form or substance which you desire to make to your testimony shall 8 be entered upon the deposition with a statement of the reasons given for making them. To assist you in making any 9 such corrections, please use the form below. If additional pages are necessary, please furnish same and attach. 10 11 Page ____ Line ____ Change ____ 12 ____ 13 Reason for change ____ 14 Page ____ Line ____ Change ____ 15 ____ 16 Reason for change ____ 17 Page ____ Line ____ Change ____ 18 ____ 19 Reason for change ____ 20 Page ____ Line ____ Change ____ 21 ____ 22 Reason for change ____ 23 Page ____ Line ____ Change ____</p>	

[& - absentee]

Page 157

&	2	35209 154:22	7
& 6:19 7:11	2 4:10 49:9,14	36101 7:13	7 4:21 96:13,19
0	49:18 72:18	36104 2:17 7:9	98:10 101:1
01530 1:15 5:15	80:23 85:9 99:6	8:9	706 18:14,23
01536 2:1 6:1	100:18,19	36117 6:21	70s 61:3
1	108:17 109:15	4	72 4:15
1 4:7 39:4 48:1,7	20001 6:17	4 4:15 72:1,6,7	76 23:3,4 24:17
72:17,23	2000a 154:21	79:10 80:19	77 4:17
1/26/26 153:23	2010 67:17	40 7:3	79 20:9,9
10006 7:4	2017 155:7	400 6:17 154:21	8
126 153:21	2020 63:6 67:18	445 7:12	80 20:9
1291 1:5 5:5	68:3 70:2	47 111:12	800-808-4958
18332 153:18	2021 4:16 70:3	48 4:7	154:23
1950 60:22	70:18 71:3 72:9	49 4:10	81 4:19
1950s 56:8	72:11 73:7 97:9	5	87 122:3
58:13 60:21	2023 4:20 79:2	5 4:17 28:10	88 122:3 126:3
1954 18:12	81:17 82:10	57:13 58:3	126:11
44:23 57:23	84:7,11 95:12	77:20 78:2 79:7	9
147:16	95:23 97:22	79:16	9 4:4
1970 120:18	98:4	5-30 155:6	9/30/24 153:22
130:18,20 146:4	2024 2:18 82:6	501 2:16 7:8 8:7	92 126:11
1970s 130:22	98:15	39:3,4	96 4:21 23:2
1971 6:20	21st 6:23	50s 53:21	9:07 8:9
1973 24:3	23rd 2:17	5th 7:3	a
1974 19:23	250 6:16	6	a.m. 8:9
21:12	2:21 1:5,15 2:1	6 4:19 81:22	abbott 7:20
1976 21:12 22:9	5:5,15 6:1	82:4,9 84:10	ability 11:23
23:5	2nd 105:23	95:13,15,23	able 34:1 57:23
1979 21:18	3	60s 56:18 57:19	59:2 76:5 86:22
1980 21:18	3 4:13 39:3,4	64 4:13	90:6
1986 27:3	64:18,20	6776826 155:1	above 8:10
1996 22:23	30 154:3 155:6,7		153:5 154:15
	300 6:23		absentee 117:12
	35203 7:1		117:18,23 118:4

118:9 absolutely 48:11 51:2 147:20 accept 35:7 accepted 138:1 access 148:16 148:16 accessibility 89:10 148:18 accident 14:2,4 14:5 accommodating 150:3 accommodati... 146:3 accommodati... 70:13 accounts 41:10 41:14 accurately 10:8 act 33:21 107:16 107:20 147:1 acting 8:2 action 153:15 active 136:5 actively 132:2 actual 150:11 actually 70:6 115:19 118:19 121:3,18 131:9 adc 119:11 addition 30:11 115:18	additional 11:20 155:9 address 18:13 101:17 addresses 18:20 adeca 58:23 59:23 60:4 adjunct 119:1 administration 21:3 28:7 administrative 20:20 28:5 administrator 20:14,15,16 31:20,22 admission 20:21 adopted 82:6 adopting 96:22 adult 31:6 115:2 118:8 adults 30:16 advise 12:10 advocate 115:16 affect 58:22 148:19 affiliated 67:4 affordable 89:13,14 107:16 113:4 african 44:11 56:3 afro 38:7 62:11 73:21 109:17 119:17 133:6	age 73:16,20 99:21 100:5,9 147:19 148:3 agenda 84:1,2,3 ago 14:9 26:18 90:18 125:5 agree 56:6 80:5 80:7 agreeable 8:21 agreed 2:11,20 3:5 80:16 98:4 119:21 agreeing 98:22 ahead 49:6 ai 148:17 aided 153:9 al 1:7,12,17,22 2:3,8 5:7,12,17 5:22 6:3,8 154:22 ala 155:6 alabama 1:2,11 1:22 2:7,15,17 4:14 5:2,11,22 6:7,20,23 7:7,9 7:13 8:2,8 9:18 18:23 19:12,14 27:10 30:18,20 37:23 43:7 44:2 44:5 49:6 52:14 53:22 56:8 59:8 59:21 60:21 64:1 65:2 67:8 70:19 72:9 84:20 85:2	86:13 90:13 92:4,20 93:7 101:15 102:3,7 102:11,12,21 103:5 109:16,19 111:4 112:6 113:7,9,13,19 113:20 114:3 116:6 119:1,6,8 119:10 120:13 122:1 129:9,11 132:15 133:2,10 133:18 134:5,23 136:6,6,13,16 137:2 138:13 141:21 143:6,13 143:23 144:10 145:3,8,12 148:13 153:3 alabama's 64:8 105:21 109:20 alabamians 148:21 align 148:8 alive 109:5 allen 1:10,20 2:6 5:10,20 6:6 7:10 9:18 46:6 allow 130:13 alluded 77:1 almighty 35:8 alonza 128:4 alternative 119:7
---	--	--	---

[ambassadors - authority]

Page 159

ambassadors 38:13	102:18,19 103:2 113:22 114:20 143:8	approved 60:8,9 60:10 107:5	assist 155:8
amenable 42:22 43:12 49:4 74:1 76:17 108:11 147:12	answered 12:21 answering 9:23 10:12,15 12:11 151:22	approximately 14:6 21:17 24:15 123:3	assistance 106:19,20
amended 4:11 50:6	answers 153:7	arbitration 15:9	associate 123:18 123:23
amendment 57:11	antonio 21:13 23:9,11 24:11	arbitrator 14:20,23	associated 17:14 36:14 122:6
amenities 94:14	anybody 16:8 47:2,5 115:20 132:17	areas 93:17,18	assume 86:6 87:17,21,22 88:5,22 89:5,16
america 59:22 92:5 94:7 112:8 112:11,13 133:8	anymore 124:9	arenas 91:10	assumption 90:11
america's 112:12	anywise 153:15	argue 58:23 59:3	astute 86:2
american 38:7 44:12 62:11 133:6 145:17	apologize 22:14	argument 75:19	attach 155:9
americans 56:3 73:21 119:16,17 148:21	appeal 110:22 110:22 111:7	arguments 150:9	attached 48:3 49:20 64:22 72:3 77:22 82:1 96:15 154:7
amm 1:5,15 2:1 5:5,15 6:1	appealed 97:15	armory 116:21	attend 23:22 24:5 26:19,23 35:6,9 68:12
analogy 91:17	appear 117:4	army 19:21,22 20:12,19 21:1 21:11 22:6,10 22:16,19 23:16 23:19 24:17 124:15	attended 24:9 25:19 26:21 69:20
andrew 46:12 46:15 47:4,8,14	appearances 6:14	arrangement 91:22	attention 63:7
announced 69:17	appearing 6:17 6:21 7:1,4,9,13	arrested 146:1	attorney 2:15 6:22 7:6 45:18 151:12 154:12
answer 11:8,11 11:12 12:8,9,21 42:6 51:3 53:2 53:10 55:8,9 87:16 88:4 92:15 99:14	applied 58:19 91:10,14	aside 143:13	attorneys 150:17
	apply 39:5 60:7	asked 12:6,20 35:12 88:12 98:1 125:3,5,12	auburn 27:3,10 37:15,18
	appointed 32:5 32:11 96:1 98:5 126:18,22 127:16,21	asking 9:22 10:14 16:2 74:15,16 75:14	authority 83:19 83:22 84:16
	appointments 50:17	assign 3:1	
	appreciate 151:22	assignment 155:1	

[auto - black]

Page 160

auto 14:4 automotive 14:2 available 94:15 avenue 2:16 6:16 7:9,12 8:8 37:6,7 average 73:15 73:20 99:20 aware 75:16 93:20 95:22 114:21 115:4 116:5 118:2,7 133:9 143:16 awareness 63:15	baines 90:17 balch 7:11 bank 38:21 baptist 35:23 36:18 37:5 barnett 125:13 barriers 136:8 143:11,17 barry 104:8,13 142:2,5,8,22 bartended 34:8 based 38:3 43:10 52:12,17 59:1 142:23 basic 28:13 basically 16:22 18:8 75:7 bathroom 54:7 110:10,10 bathrooms 109:12 110:2,8 bear 65:10 beasley 139:3 beat 104:4 beauties 86:23 beautiful 39:13 92:3,4,5 becoming 125:6 beginning 8:9 behalf 6:18,21 7:1,5,10,13 belief 86:21 87:3 124:1 133:20 134:2,13	believe 54:21 57:2,3 62:1 77:9 89:7 91:6 99:3 99:15 102:6,22 103:6 122:18 125:3 134:3 144:10 145:3 belly 134:15 belong 35:10 118:17 belt 37:14,21 38:8 39:20 40:5 40:13,14,19 58:16 59:5 65:8 66:22 67:2,10 67:16 87:13 88:7,16 89:4 benefactor 111:18 benefit 61:3 111:18 113:9 benjamin 46:4 berry 6:20 139:12,14,16 best 11:22 40:17 53:15 54:23 76:8 109:21 115:1 125:20 150:5 better 53:13,17 55:1 65:15 66:2 74:6 75:5,11 79:10,17 90:20 91:22 92:23 99:15,16,19,21	99:23 112:22 113:1 148:1 bias 101:21 biden 137:2 big 93:8 106:17 113:14 bill 51:14,15 101:4 113:6 billy 139:3 bingham 7:11 birmingham 6:23 8:2 154:22 birth 113:1 bit 17:12 90:16 bitty 113:10 black 37:14,20 38:8 39:20 40:5 40:13,14,19 44:11 54:1 55:2 58:16 59:5 61:2 65:8 66:22 67:2 67:8,10,16 81:2 86:11 87:8,11 87:13,19 88:5,7 88:12,16,18 89:4,4,18 90:1,2 91:7,13 93:17 93:18,21 94:3 100:5,5,8,8 101:16,23 102:8 102:13,21 103:5 111:8 124:5 125:22 128:7 137:13 138:13 138:17 139:23
b			
b 139:17,18 babies 54:4 back 11:6,17,19 17:2 21:5,22 22:3,4,6,19,23 27:2 35:14 39:1 40:3,15,16 41:8 47:22 56:21,21 57:21 58:7 59:10 63:5 66:7 72:7 74:5 75:7 104:23 107:2 109:16 112:19 113:8 122:2 123:16 126:12 144:16 148:3,3 154:3 backing 56:21 56:21			

[black - cars]

Page 161

140:9,10,17,20 140:21,22 141:4 141:5,14,19 143:3 144:11,18 145:4,9,13 blacks 57:23 119:14,15 143:3 148:2 blacksher 6:22 blemish 62:9 blood 86:22 87:4,5,10 91:15 blue 50:7 91:20 board 123:2 bobby 1:7 5:7 46:1 103:17 104:4 106:4,12 106:22 bombarded 41:17 books 54:11 61:8 146:8 booths 115:11 born 18:9,11 19:9 44:23 53:21 54:2 57:22 147:16 borne 134:14 bottle 13:9 bouquet 91:21 92:3 109:16,18 bowl 91:17 boy 120:14 147:4	break 12:16,22 13:12 62:21 123:11 breakdown 73:15 breaks 12:15,19 breathe 149:4 brief 63:1 123:10,13 briefs 17:17 bright 103:17 104:4 106:22,23 109:22 bright's 106:4 106:12 bring 121:3 bringing 92:1 broad 86:16 broadband 54:17 148:18 brochures 131:15 broke 29:11 60:12 bronner 113:7 113:12,15 brooke 20:19 brothers 55:10 55:18 56:4 90:8 148:20 brought 48:21 61:4 81:5,5 145:19 brush 86:16 91:6	building 116:21 buildings 146:12 bullock 18:17 19:6,12,17 22:6 22:19,23 24:1 32:3,21 33:1,12 34:15,20 38:7 54:1 58:18 61:11 65:22 66:15 67:19 70:10 92:8 93:15 94:21,23 106:7 119:2,4 122:6,11,22 126:23 127:7 128:14 129:15 129:19 131:18 135:13 140:2 bunch 69:12 buses 146:12 business 38:16 c c 37:6,7 39:3,4 153:1,1 call 26:10 36:6 37:19 45:3,11 57:21 109:6 111:11,13 116:20 121:2 called 12:16 28:8 36:8,9,22 93:7 119:2 calling 35:8	calls 53:1 55:5 74:12 87:15 92:14 99:13 102:17 cameron 25:6 25:14 camp 53:13 campaign 110:22,23 campaigns 111:3 130:15,19 130:21 131:3 campus 26:2 candidate 108:3 108:7 111:7 118:12 121:16 124:5,5 138:8 candidates 118:18 119:21 120:1 130:15,17 131:1,9,17,21 132:4 134:6 135:1 141:22 capacity 1:11,21 2:7 5:11,21 6:7 capital 131:13 car 14:5 34:5 129:3 care 107:16 113:2 careful 57:1 caring 36:22 cars 34:4,12 62:11
--	--	--	---

[case - colleges]

Page 162

case 1:5,15 2:1 5:5,15 6:1 12:13 13:21 46:16 51:7,22 75:17 76:1,10 95:14 101:9 150:13,19 cases 13:23 14:17 15:2,8 88:21 caster 2:3 6:3 45:12 78:18 catering 86:21 cause 8:10 153:16 caused 149:13 cd 100:18 cdbg 58:19 census 52:9 63:6 63:13 67:18,18 67:22 68:2 70:2 center 20:19 31:21 104:21 central 40:11 ceo 113:14 cert 154:18 certain 54:16 60:15 68:14,15 80:3,17 144:19 certificate 35:14 certified 6:12 153:20 certify 8:3 153:5 153:13 155:2 chair 132:19	chairman 32:4 32:6 45:8,9 58:17 105:9 106:7 122:11 123:1 125:4,16 125:20 126:19 126:23 128:3 140:4,6,9 challenge 138:1 challenges 50:11 71:6 88:2 89:3,6 104:20 117:16 122:17 challenging 48:22 49:2 72:12 change 11:14,16 73:3 155:11,13 155:14,16,17,19 155:20,22,23 156:1,3,4,6,7,9 156:10,12,13,15 changed 56:9 60:20 73:1 124:10 142:21 changes 52:10 52:10 61:5 154:7 155:4,5,7 changing 62:4 chapter 40:9,20 characteristics 86:9 charge 113:17 chase 6:20	chestnut 45:16 45:18,18,22 child 113:2 145:23 148:22 children 30:4,8 30:15 115:2 118:8 130:12 148:22 choctaw 65:21 66:13 choice 108:4,7 choose 83:11 134:17,19,19,21 134:21 143:7 choosing 83:12 84:17,18 chose 73:23 church 35:10,17 35:21,23 36:15 36:18,20 37:5 39:8,10 63:12 76:2 115:13,15 115:15 churches 36:2,3 circuit 117:17 141:6 citizen 117:20 145:9,13 citizens 67:9 88:6,13,18 89:4 89:18 90:1,3 100:8,9 city 18:15 31:23 32:23 33:9 39:18 87:12	88:9 103:19,23 120:6 124:17,17 126:1,4,20 128:9 140:13 145:23 civil 8:4 148:10 155:6 claim 48:18,20 clair 31:2 clark 139:21 clarke 66:14 class 44:15 94:14 classes 28:12,15 28:16 clean 58:20 clear 12:14 70:1 clerk 28:6 141:7 clerk's 117:17 client 151:1 close 44:7 closed 41:14 club 34:19 83:21 103:16 code 62:4 111:19,22 112:7 112:12 155:6 cold 146:12 college 24:6,8,9 24:10,12,21 25:3,18 26:19 27:20 31:19 146:21,22 147:2 colleges 27:1,14
--	--	--	--

[color - copy]

Page 163

color 44:6,10 49:5,9 52:22 53:8 62:8 90:20 colored 54:5 come 16:18 21:5 33:20 35:14 53:13 85:16 87:9 103:15,15 103:15 106:17 107:23 112:19 113:8 120:4 121:1,3 133:2 137:23 coming 61:16 105:1 135:7,8 151:3 commission 29:5 32:4,7,21 33:2,13,21 45:9 58:18 105:9 106:9 126:23 127:7 128:15 140:2 153:22 156:23 commissioner 2:15 3:6 8:3 125:21 committee 45:10 122:12 common 87:12 87:20,23 88:7 88:15,19 commonalities 95:2	communities 54:19 59:4 91:14 community 37:14,21 38:8 40:20 47:12 53:14,22,23 58:20 63:14 64:6 67:2 68:19 69:5,19 70:8 79:21 85:19 86:8 93:6 company 34:14 competitive 58:20 complaint 4:8 4:11 17:15 48:15,18,22,23 50:3,6 complete 11:13 11:22 115:20 completed 154:18 completely 13:4 computer 42:6 153:9 concern 49:3 concerns 73:11 101:17 143:21 conclusion 53:1 74:12,16 99:13 102:17 113:11 concurrence 81:8	conditions 13:2 143:14 conference 119:8 confused 39:4 congress 102:5 102:13 103:11 congressional 9:19 42:23 43:2 49:4,8 70:19 71:3 72:19 80:23 85:9 100:18 101:1,15 102:7,22 103:6 105:22,23 132:20 congressman 106:23 connect 89:3 connection 110:12 connections 110:6 consecutive 127:10 consider 28:19 125:5 consideration 70:20 118:13 considered 125:1,8 considers 85:12 consolidate 61:13	constitution 57:3 contact 104:18 105:3,6,8,21 106:4 contacted 104:13,17 105:16 106:12 contacting 105:14,17,18 106:22 continue 34:1 83:18 121:11 130:10 continued 82:20 continuing 27:7 contract 26:8 contracts 26:12 contribute 150:13 conveniently 116:23 conversation 10:3,5,10 conversations 16:7 convince 90:19 cooper 51:14,15 101:4 copies 154:13 copy 48:3 49:20 64:22 72:3 77:22 82:1 96:15
---	---	---	---

[core - decision]

Page 164

core 133:20 134:2 correct 22:21 73:3 78:10 97:6 127:8 153:10 corrections 154:7 155:9 corridor 149:3 council 32:23 33:9 103:23 120:7 124:17,18 126:2,4,20 128:9 140:14 councilman 31:23 103:19 counsel 2:13,21 2:23 8:7 11:18 12:2 153:14 counted 64:4 66:4 counties 4:14 37:23 38:6 65:2 65:7 66:22 68:22 92:22 counting 44:12 44:14,16,17 country 83:20 103:16 counts 18:3 county 18:17 19:6,13,17 22:6 22:19,23 24:1 30:23 31:2,5 32:3,7,21 33:2 33:13,20 34:3	34:16,17,18,20 38:7 39:14,17 54:1 57:6,7,8,10 58:18 61:11 64:5 65:19 67:13,13,19 70:10 92:8,17 92:18,21 93:5,5 93:14,15,18,23 94:18,21,21,22 94:23 95:4,8,9 106:7 119:2,4 122:6,11,22 125:20 126:23 127:7 128:15 129:15,19,23 131:1,18 135:13 136:7 140:1,2 153:4 couple 64:10 125:4,4 137:6 146:11 148:22 course 11:11 17:16 60:5 67:11,12 84:12 106:5 court 1:1 4:22 5:1 6:13 8:1,6 8:18 10:5 11:6 15:12,16 17:15 51:21 75:3,8,14 75:17 76:1,7,11 76:19 79:4 81:13 82:11 96:1,9 97:5,7,16	98:3,3,8,18,22 101:9 149:20 150:12,15 153:20 154:16 court's 95:13 96:21 98:12 courts 73:2 75:2 cousin 20:23 cradle 113:3 create 49:3 created 101:10 creation 82:16 credit 62:13 crippled 148:22 criteria 39:23 crowded 21:6 crunched 74:4 cs 154:18 cuff 73:17 current 116:18 132:14 currently 31:9 34:22 35:16 99:11 curse 90:21 cv 1:5,15 2:1 5:5 5:15 6:1 cycle 51:13 78:10	damned 112:21 dangerous 36:12 daniel 127:17 dark 57:22 darryl 47:4,13 data 64:15 70:2 date 8:3 70:5 122:16 154:3 daughter 92:16 93:7 daughter's 94:1 daughters 31:1 42:4 92:17 94:2 david 113:6,12 113:15 day 2:17 36:5 107:4,4,6 120:13,20 121:14,18 132:18 156:19 days 137:6 154:3 dc 6:17 56:14 75:20 110:5 dealership 34:5 dealt 121:6 dear 147:8 debt 62:16 decide 63:18 76:11 deciding 85:12 118:11 decision 73:18 75:23 83:19
		d	
		d 4:1 7:8 dad 109:5 dallas 65:21 66:14	

<p>95:14</p> <p>decisions 51:21</p> <p>declaratory 4:8</p> <p>4:11</p> <p>decreased 64:9</p> <p>deep 142:7</p> <p>defendant 7:10</p> <p>defendant's 4:6</p> <p>48:1,6 49:14,18</p> <p>64:17,20 72:1,6</p> <p>77:20 78:2</p> <p>81:22 82:4</p> <p>96:13,18</p> <p>defendants 1:13</p> <p>1:23 2:9 5:13,23</p> <p>6:9 7:14</p> <p>defense 7:2 26:7</p> <p>26:8</p> <p>definitive 78:17</p> <p>degree 25:8</p> <p>27:21</p> <p>delegation</p> <p>105:22</p> <p>delivering 54:4</p> <p>democrat 102:2</p> <p>124:6 127:2</p> <p>128:5 139:4</p> <p>democratic 45:9</p> <p>69:7 119:8</p> <p>122:1,6,12,23</p> <p>123:7,19,23</p> <p>124:12,13,20,22</p> <p>128:10,11,17</p> <p>129:10,13,15,18</p> <p>129:20,23 130:4</p>	<p>131:5,8 132:15</p> <p>133:2,10,18</p> <p>134:5,9,15,23</p> <p>135:13 136:6,7</p> <p>136:9,22</p> <p>democrats</p> <p>136:14,17</p> <p>138:14,18</p> <p>denied 52:19</p> <p>53:4,5,7 58:21</p> <p>60:4</p> <p>deny 62:17</p> <p>department</p> <p>26:7,8</p> <p>depends 135:3</p> <p>deponent 152:4</p> <p>154:2,6,7,10,16</p> <p>deponent's</p> <p>154:6 156:18</p> <p>deposition 2:13</p> <p>3:2,6 9:20 11:11</p> <p>14:17,22 15:2,6</p> <p>15:16,19 16:5</p> <p>16:12,15,17</p> <p>17:1,10,22 65:6</p> <p>153:6 154:6</p> <p>155:8</p> <p>descent 43:21</p> <p>109:17</p> <p>describe 69:3</p> <p>described 88:9</p> <p>desegregate</p> <p>61:15</p> <p>deserve 43:11</p>	<p>deserving 39:22</p> <p>designated</p> <p>66:22 67:1</p> <p>desire 100:21</p> <p>119:19 155:7</p> <p>desires 88:1</p> <p>89:2,6,8 100:2</p> <p>dexter 7:12</p> <p>dialogue 142:7</p> <p>differences</p> <p>120:4</p> <p>different 10:4</p> <p>15:15 17:15</p> <p>21:4 26:12 39:2</p> <p>43:20 54:15</p> <p>56:7 62:6 68:22</p> <p>76:3 78:14 96:9</p> <p>101:11 115:12</p> <p>133:14 137:2</p> <p>directed 73:3</p> <p>75:6 97:5</p> <p>directly 146:21</p> <p>dirt 54:9,9,10</p> <p>dirty 57:21,22</p> <p>57:22</p> <p>discharged 22:4</p> <p>22:22 23:8</p> <p>24:16</p> <p>discriminate</p> <p>144:11 145:4</p> <p>discrimination</p> <p>143:21 144:5,6</p> <p>discussed</p> <p>143:20 144:4</p>	<p>discussion</p> <p>13:14 41:4</p> <p>47:19</p> <p>disenfranchised</p> <p>56:22</p> <p>disparity 59:12</p> <p>disposition</p> <p>20:21</p> <p>disrespect</p> <p>112:18</p> <p>disseminated</p> <p>54:20</p> <p>disseminating</p> <p>63:11</p> <p>district 1:1,2</p> <p>5:1,2 8:5 35:9</p> <p>42:23 43:2,11</p> <p>44:3 49:3,4,9</p> <p>61:5 62:6 72:23</p> <p>80:23 85:9 99:6</p> <p>100:4,18 101:1</p> <p>101:22,23 102:7</p> <p>102:13,22 103:6</p> <p>105:23 108:10</p> <p>108:15,17</p> <p>109:15 132:20</p> <p>districts 72:19</p> <p>85:13 101:16,20</p> <p>division 1:3 5:3</p> <p>divorced 147:3</p> <p>dix 21:23</p> <p>dna 109:10,11</p> <p>148:8,9</p> <p>doctor 54:5</p>
---	---	---	---

document 48:8 49:16 50:5 64:17 97:1 98:9 98:22 99:1 documents 17:9 17:13,20 71:15 71:16,18 77:16 81:17 150:10 doing 83:17 112:15 115:10 125:15 134:6 149:23 150:8 dollar 120:10 dollars 39:20 dominated 112:17 don 127:1 donation 38:22 39:17 door 131:14,14 doors 110:11 131:10 dorman 7:12 9:1 150:23 doubt 85:10 doug 132:6 dr 132:16 133:5 draft 48:14 draw 68:7 75:15 76:22 79:13 85:12 101:5 102:7,12,21 103:5 drawers 69:8 81:7	drawing 68:21 79:5 81:12,18 82:22 83:8 84:6 95:12 drawn 52:11 62:5 79:11 80:20 84:4 97:19 101:18,23 dream 145:17 drew 73:7 75:15 77:18 79:13,17 82:10 84:11 95:23 97:9,21 drive 18:14,23 50:12 129:2 drop 146:14 dubose 46:2 due 154:3 duly 8:15 duties 20:20 dynamic 142:21 dysfunction 133:16	easy 10:9 148:16 eat 112:3 economically 94:20 educated 38:15 education 89:11 92:23 147:6 eeoc 28:16,17 29:2 eight 36:19 66:1 101:11 eighty 60:19 either 14:17 75:15 100:5 101:19 118:9 122:3 elated 16:20 elect 80:1 108:16 elected 32:4,8 49:8 102:2 120:17 electing 108:13 election 78:10 111:9 116:12,15 116:17 120:13 121:14,18 135:7 elections 98:16 110:16 116:16 122:19 128:13 130:1 131:21,22 electronically 154:8	eleven 33:6,7 elias 6:15 eligible 114:4,6 116:3 ellis 128:4 ellison 125:13 email 154:18 embarrassing 104:7 emotional 149:7 employed 31:10 employer 33:22 employment 29:3 31:18 empty 90:22 encourage 46:22 47:2 116:8 encouraged 135:11,16 encouraging 115:18 ended 32:12 37:16 38:12 105:1 endorsed 137:20,22 energize 137:11 energized 137:9 138:4,11 energizing 137:13,17 energy 109:14 engagement 63:14
	e e 4:1 28:10 37:6 37:7 139:18 141:13 153:1,1 155:6,7 eagle 120:10 earlier 15:23 50:7 63:7 80:19 86:3,10 90:7,12 96:6 127:6 easily 62:8 146:22		

[enjoy - father]

Page 167

enjoy 86:23 enjoyed 151:23 enroll 25:2 enrolled 24:14 24:20 27:3,9,13 entered 155:8 entire 21:14 43:8 61:9 146:6 epitomizes 109:23 equal 29:2 91:23 equipment 38:20 era 57:21 112:9 errata 154:3,7,8 154:10,12,13,15 154:18 155:1 especially 43:7 59:5 esq 154:1 established 57:16 et 1:7,12,17,22 2:3,8 5:7,12,17 5:22 6:3,8 ethnicity 43:21 44:10 europe 25:20,23 26:11,20 56:5 european 55:10 55:18,19 90:7 94:6 119:16 133:8 148:19	evaluate 35:13 evan 1:17 5:17 event 16:19 129:4 events 115:12 129:3 131:10 everett 104:6 everybody 42:1 44:12 91:3,23 117:11 136:19 142:11 everybody's 64:4 everyone's 112:23 evidence 3:3 95:19,21 exact 44:8 108:7 122:16 exactly 64:12 75:13 examination 4:3 8:11 9:14 examined 8:15 example 57:18 58:17 except 2:22 23:2 exclude 66:18 66:19 excluded 66:17 excluding 67:3 executive 45:10 122:12 exhibit 4:7,10 4:13,15,17,19	4:21 48:1,7 49:14,18 64:18 64:20 72:1,6 77:20 78:2 79:7 79:10,16 80:19 81:22 82:4,9 84:10 95:13,15 95:23 96:13,19 98:10 exhibits 4:6 expand 83:14 90:16 113:5 expansion 113:6 expected 120:23 experience 106:14,15,15 experienced 53:14 143:12 147:11 experiences 86:6 experiencing 143:17 expert 17:19 51:6 74:4 81:15 82:12 101:4,10 experts 81:6,8 expires 153:22 153:23 156:23 explain 40:3 80:11,13 85:21 85:23 86:2 explained 81:6 81:7	expound 17:11 extension 37:18 extensive 28:4 extent 99:13 102:17
f			
f 141:13 153:1 facebook 41:16 41:19,21 42:3,9 42:16 facility 154:20 fact 38:2 factor 93:6 factors 85:11 93:3 factory 95:5,6 facts 93:6 factual 64:15 factually 74:16 fair 75:5 86:13 114:11 fairbanks 7:7 9:17 familiar 135:21 135:22 family 20:22 27:19 30:7 42:11,14 45:18 59:18 133:15 faniel 141:10,10 141:12,16,18 father 87:10 108:23 116:4 147:3,22 148:10			

[father's - given]

Page 168

father's 34:8,19 federal 8:4 33:22 61:10 107:10 feel 111:6 148:13 149:19 feeling 114:19 feet 121:4,5 fema 106:18 field 21:6,6 fielding 134:6 fifty 100:16,16 fight 61:20,22 figuratively 110:9 figures 108:19 109:8,23 147:19 file 150:9,10 154:12 filed 9:20 48:15 50:7 51:21 96:8 99:9 154:15 filing 3:5 fill 32:5 154:7,8 filled 36:3 finally 75:14 finance 62:10 financed 62:15 financial 62:7 62:15 113:15 find 42:2 fine 9:1,9 10:17 12:1 51:3 103:10	finish 10:12,13 27:4 32:17 126:18 128:1 finished 23:18 fire 33:7 59:18 59:19 first 4:11 8:15 14:6,12 20:2,13 22:10,15 24:9 24:16 35:7 47:10 50:6 61:8 71:11 88:12 109:9 114:2 126:1 fiscal 120:7 five 66:1 flattering 125:7 125:9 flipped 143:4 flood 106:17 floor 7:4 flowers 109:17 135:19 focused 44:11 follow 68:9 77:4 followed 68:11 following 8:11 23:20 155:5 follows 8:16 food 38:21 foregoing 8:6 153:6,10 forgive 115:14 forgot 81:3	forgotten 44:2 form 2:22 12:4 12:7 101:16 155:7,9 formative 146:19 147:14 fort 21:23 22:1 forte 139:12 fortunate 56:12 forum 118:18 118:23 forward 47:11 109:20 154:12 fought 60:1 foundation 37:15,21 38:8,9 40:20 67:2 founded 38:1 fountain 54:7 four 39:1 44:6 66:1 126:6 140:4,15 fred 61:1 120:17 130:23 freedom 45:1 friendlier 144:23 front 35:10 50:19 full 11:22 fully 143:12 fund 7:2 funding 64:5 129:22	funds 60:15,17 furnish 155:9 furniture 146:9 further 2:19 3:4 148:3 151:2 152:4 153:13 future 130:7 fuzzy 122:20
			g
			gain 67:21 gained 57:19 67:17,20 gang 60:12 76:4 gas 129:2 general 7:6 general's 2:16 generally 116:13 generator 21:8 gentleman 125:5,8,14 germany 22:3 55:22 getting 20:10 40:2 give 11:10 35:14 38:22,22,23 39:7,8,21,21 40:11,14,16 58:16 64:16 69:14 79:18,19 88:4 98:23 142:17 given 52:13 76:21 86:23

[given - heard]

Page 169

87:1 98:9 129:19 131:12 153:11 155:8 gives 39:17 79:23 giving 40:2,14 68:22 98:13 glasses 65:15 gloves 38:19 go 11:17,19 23:5 23:16 28:6,10 28:11,12,13,16 35:10 38:13 40:9 41:1,7 47:16,22 48:9 49:6 54:17 57:21 58:6 61:17 62:7 63:4 65:22 75:19 92:21 93:23 104:5 108:2 109:16 115:10 115:20 117:16 117:16,20 120:9 123:16 135:4 144:22 145:20 145:21 146:17 147:1,2,11 148:2,3 goal 102:1 goats 112:3 god 35:8 87:1 117:20 goes 28:18 63:23 85:15	134:22 going 9:10 10:11 19:1 48:5 49:11 50:18,21 54:5 57:14 60:6 60:7 62:20 63:8 64:16 65:14 66:7 67:4 68:21 71:5,6 85:22 96:17 107:2 108:20 118:5,20 131:14 146:21 147:1 gold 113:16 goldwater 142:2 142:5,8,22 golly 20:9 good 9:16 40:17 47:9,11,14 92:7 111:20 134:6 gospel 36:22 gotten 110:7 government 38:22 40:10 143:22 144:7 governor 32:5 74:21 85:4 127:1 gpa 146:23 graduate 24:18 graduated 24:3 grandchildren 31:7 granddaddy 148:4,4	grant 39:5 58:19,20 59:23 grants 60:3 grave 113:3 gray 43:15 61:1 120:17 130:23 great 10:3 47:12 106:14,14,15 112:8,11,12,13 125:7,16 146:23 148:4 150:8 greene 65:20 66:13 greetings 154:5 grew 52:17 53:22,22 54:13 61:8 64:9 grounds 3:1 group 6:15 42:12,14 80:3 137:18 138:2 grows 63:22 guess 41:23 121:2 133:15 gutted 56:13 guy 113:15 124:17	handing 72:5 78:1 82:3 happen 62:10 happened 38:4 38:5 61:6 68:2 74:9,17 75:1 142:4 happening 56:23 happy 12:17 hard 10:11 harmed 90:5,8 harris 136:21 137:20 138:1,5 141:11,14,18 hatch 33:21 hay 112:2 he'll 90:22 head 10:17 66:9 133:4 headquarters 39:19 health 32:18 39:10 50:10 59:12 117:15 130:11,12 143:14 healthcare 89:11,14 113:5 148:17 hear 11:4 123:21 144:1 heard 45:15 66:5 85:20 86:1 108:6,8
		h	
		hair 43:15 hale 66:14 haley 137:18,21 137:21 half 147:19 hand 96:18	

hearing 64:14 153:12 hearings 68:13 68:15 heat 146:12 heck 90:21 held 13:14 33:7 41:4 47:19 70:9 123:6 help 10:18 55:14 81:5 96:3 104:22 107:7 115:7,19 121:17 147:4 helped 129:2 130:3 helpful 65:3 150:4 helping 63:11 hereto 48:3 49:20 64:22 72:3 77:22 82:1 96:15 hi 151:17 high 23:17,18 23:21 24:1,2 37:17 61:9 100:15,23 146:6 146:23 higher 62:16 92:23 93:2 99:22,23 100:13 144:19 highest 144:20	hired 31:20 101:5 historic 16:19 hold 57:12 66:12 122:21 127:22 147:8 holder 56:14,16 57:5,6,10 144:8 holding 50:8 79:16 holy 87:9 home 54:2 homes 106:21 honest 42:4 47:11 hoops 144:22 hope 38:12 80:11 84:4 hospital 20:21 54:3 89:12 hosting 131:10 hour 15:7 62:20 hours 28:1 house 30:2 53:17 85:2 94:1 111:12 139:8 houses 131:14 housing 89:14 huge 91:6 huh 12:12 17:2 17:7 19:8 20:16 22:2,17 26:15 29:6 30:17 46:14 49:13 50:4 68:8 73:8	73:10 76:20,23 78:21 79:1,3,6 80:21 88:14 90:15 92:9 96:7 97:11,17,23 98:2,6,11,20 100:10 101:7 102:14 106:2,10 108:18 110:3 111:5 127:9,9 128:16 130:5 132:10 141:18 147:5,15,18 148:12 human 131:13 hundred 106:21 107:2 121:5 hurt 148:23 hypocritical 107:22 i ideals 143:1 identification 48:2 49:19 64:21 72:2 77:21 81:23 96:14 illness 136:11 illustrative 101:5 imagine 27:19 114:8 146:5 immunized 38:18	impact 58:22 impediment 57:16 144:15 impediments 83:16 important 10:8 10:16 63:13 110:7 impose 98:8 imposed 98:18 incarcerated 144:18 incarceration 144:14 include 32:22 32:22 37:22 68:13 included 76:13 96:9 including 13:1 17:14 18:6 78:19 increase 64:5 independents 138:10 indicating 49:23 74:7 95:1,16 127:20 individual 40:10 80:16 106:20 134:13 individually 81:20 indoctrinated 91:2
--	---	--	---

[influential - know]

Page 171

influential 93:10 information 52:13 63:12 95:11 143:19 144:3 informed 73:18 infrastructure 54:15 58:15 89:15 91:13 92:7 93:12 107:20 112:23 149:2 ingredients 85:14 initial 35:12 initially 28:5 injunction 4:22 97:13,16 98:1 98:13,23 injunctive 4:9 4:12 injury 136:10 inspectors 121:2 installations 26:13 instance 17:15 39:6,10 institution 62:15 institutions 62:7 integrate 61:13 integrated 61:14	intelligent 58:8 intent 95:11,18 interest 55:11 85:19 86:8 90:14 interested 144:6 153:15 interim 36:21 internet 18:7,8 65:3 interpretation 91:9 interrupted 22:14 26:22 interview 134:16 intimidating 121:7 involved 13:21 14:1 38:5 44:20 44:22 45:1 58:11 69:4 128:12 130:14 130:18 131:2 136:9 ironclad 107:2 isner 132:22 133:7 issues 119:20 130:11 it'll 79:18,18 148:19 ivey 85:5 127:21	j j 29:14 j.l. 45:21 james 6:22 141:3 january 23:20 23:20 jasrasaria 6:16 8:23 9:8,12 52:23 53:9 55:4 55:7 62:19 74:11 87:14 92:13 99:12 102:16 103:1,8 151:8 154:1 jefferson 67:13 153:4 jersey 21:23 job 33:14,16 40:8 110:13 125:16 134:6 149:23 150:8 jobs 34:2,7 joe 132:16 137:2 john 135:4,5 johnson 61:10 61:11 90:18 join 124:11 136:19 joined 23:19 59:14 122:4 138:2 146:20 jones 46:4 132:6 juanita 29:14,21 30:12	judge 61:10 127:17 140:23 july 2:18 jumped 145:22 junior 24:10,12 24:21 jyoti 6:15 154:1 k k 37:6,7 kamala 136:21 137:20 138:1 kathryn 7:3 kay 85:4 127:21 keep 50:16 55:21 66:9 85:8 kept 27:17 kids 16:13,15 42:5 146:14 kin 153:14 kind 28:2 119:7 128:20,22 kinds 17:17 71:17 89:8 111:22 119:20 knew 26:14 knock 110:11 knocking 131:10 know 11:1,18 11:18 12:17 18:1 26:17 31:12 40:22 45:12,13,16,17 45:18,19,20 46:1,4,6,8,10,12
---	--	---	--

[know - lived]

Page 172

50:20 51:2,9,14 51:17,23 52:1 53:12,12,13 58:5,6 59:5 60:18 64:8,12 64:13 66:20 67:14,16,19,20 69:12,16 71:4,9 77:13 80:10 85:11,14,15,18 87:11,18 92:11 100:12 102:19 105:16 108:5 109:11 110:6,8 110:11,15,19,21 113:3,22 117:9 117:10,18 118:20 120:5,8 121:1 122:10,15 122:18 129:4,18 129:20 135:7,19 135:22 136:1 138:12,16,20,22 139:8,13,16 140:5,22 141:6 141:20 142:1,4 143:5 144:16 145:5 146:2 147:21,22,22 148:5,9,11 knowledge 115:1 known 40:18 knows 110:1	korea 22:4 l l 2:10,14 6:12 8:1 35:22,22 37:6,7 141:13 153:19 labeled 50:5 labor 61:4 lack 53:15 75:5 75:10 146:12 lady 103:18 127:19,20 lakeisha 45:16 large 67:9 81:1 124:16 late 81:11,17 law 6:15,22 74:21 150:4 lawsuit 9:19 17:14 42:10,14 42:18 43:5 44:21 74:9,17 lawton 22:1,2 lawyer 57:14 151:6 lawyers 16:4,8,9 16:12 79:9 101:5 150:7 151:7 ldf 7:2 lead 35:16 leader 36:4,5 134:19,20,22 leaders 132:14 133:1	leadership 28:12 123:7 133:9 leading 2:22 136:21 leads 113:10 league 119:3,5 leave 11:21 22:7 22:8 55:15 68:4 81:14 88:2 112:1 142:9,10 150:17 leaves 111:14 lee 46:1 95:9 legal 7:2 53:1 74:12,16 99:13 102:17 149:22 legislation 107:10 legislative 4:16 4:20 68:9 77:4 81:11 legislators 61:2 63:18 68:23 69:9 75:10 legislature 68:6 70:19 71:20 72:9 73:7 74:19 74:20 76:21 77:16 78:23 79:5,11,13,17 80:9,20 81:17 82:6,10 84:11 85:12 95:12,23 97:8,9,21	legislature's 95:18 library 39:6 145:21,22 license 153:21 life 112:21,22 112:23 113:1 liked 79:12 limited 145:20 line 51:8 100:2 104:5 119:18 155:11,14,17,20 155:23 156:1,4 156:7,10,13 lines 52:11 68:7 listed 72:17,22 listened 74:3 listing 28:20 litany 146:17 litigation 13:21 46:13 102:2 little 17:12 24:22 50:12 62:17 91:16 93:6 113:10 120:14 146:7 149:7 live 21:12,18 30:18,20 31:1,4 31:5 59:11,15 92:16,17 93:7 93:19 94:5 101:19 112:23 lived 18:22 19:11,14,16,20
--	--	---	--

[lived - map]

Page 173

23:13 54:8 lives 30:23 living 95:4 148:17 livingston 7:14 llp 7:11 local 37:17 38:21 40:8 118:18 129:15 131:1 located 116:23 location 121:14 locke 37:6 logical 45:11 long 15:5,6 18:22 20:1 23:10 24:20 25:13 26:19 27:9 29:20 33:3 41:18 48:11 98:21 121:23 122:5 123:4 126:4 longer 109:19 look 16:23 17:8 42:3 43:10,12 43:14,22 44:3 58:15,16 59:15 59:17 61:19 70:16 78:13 91:12 96:23 109:20 137:18 144:14 147:10 looked 17:4,6,21 52:3 65:12	73:19 80:19 looking 18:2,7 67:11 71:2 72:15 73:14,19 108:14 looks 80:1 lord 115:14 lose 64:1 lost 64:12 67:17 126:10,12 lot 28:11 34:4 38:20 50:13 56:11,16 58:4 58:10 60:12 91:1,2,10 94:3 131:13 138:9,10 148:1 150:7,9 love 46:6 89:12 91:18 118:5,6 lowliest 90:19 lowndes 65:21 66:14 loyal 124:22 lyndon 90:17	37:3,9,12 39:15 43:17 45:5 46:3 46:5,7,9,11 47:1 47:6 51:16,19 52:4 65:9 71:11 71:21 72:11 75:21 81:14 82:12 94:19 96:5,11 99:7 101:2,14 102:4 104:15 105:12 107:8 110:20 111:1 114:7,14 115:3,6,9 116:7 116:10 117:2,5 117:8,13 118:1 118:10 120:2 121:22 122:13 123:9 125:11 127:12,15 128:6 128:8,19 130:8 135:15,18 136:3 139:5,15 140:12 141:23 142:16 macon 31:5 34:17 65:23 66:15 94:17,20 95:3,8 made 2:21 56:17,18,18 74:1 110:12 134:12 146:23 madison 67:13 maiden 141:16	mail 154:10,19 main 49:2 major 40:5 43:7 136:2 majority 84:20 85:1 91:6 101:17 102:8 make 3:1 10:18 11:7,19,20 12:13 38:10,13 38:15 42:22 48:10 59:8 64:4 70:14 73:18 75:22 89:15 92:2,3,4 109:15 112:8,10,13 113:2,4 121:3 144:22 148:6 155:7 makers 83:19 makes 84:4 91:22 99:19 making 39:12 85:15 146:15 150:8 155:8,8 male 112:17 man 47:11 90:19,20 management 25:1 27:8 manasseh 46:8 manually 154:8 map 4:14,18,23 65:2 68:21 69:8 70:16,21 71:13
	m		
	ma'am 10:2,21 11:3,9 14:11 15:10,13 16:10 18:10,18,21 19:10 21:15 24:7,13,19 25:10 27:22 29:19 30:19,21 31:8,8 32:10,15 33:11 36:16		

[map - michelle]

Page 174

71:14 72:7,8,10 72:15 73:6,12 73:14,19,22 74:9,18 75:8,12 76:22 77:18 78:4,8,16,18 79:5,7,8,10,11 80:1,2,4,5,8,20 81:7,12,18 82:6 82:7,8,9,12,16 82:23 83:9 84:7 84:8,10 95:12 95:23 97:3,7,10 97:18,22 98:4,7 98:14,17,23 99:5,8,10,16,17 100:12 101:18 maps 16:23 17:3 17:17 70:19 71:3,3,9,11,16 71:17 77:7,10 77:15 96:10,22 98:18 101:6,8 101:11 march 45:1 marcus 2:3 6:3 45:12 marengo 65:20 66:13 margaret 93:7 marked 48:2,6 49:19 64:21 72:2,6 77:21 78:2 81:23 82:4 96:14,18	marketing 25:1 27:7 marking 49:12 64:17 married 29:18 29:19,21 martha 103:21 103:22 105:3,14 maryland 25:20 25:22 26:6,10 26:10,17,18,20 mask 38:19 masquerade 56:11 62:2 masquerading 75:13 mass 45:2 massachusetts 6:16 master 96:1,8 97:4 98:5,19 master's 96:22 match 60:13 materials 69:4 matter 9:22 38:2 83:21 matters 30:1 matthew 7:19 7:20 maxwell 51:17 mayor 103:19 139:19 140:15 140:16 mean 20:17 28:18 43:1	54:10 55:12,18 60:14 87:6 89:19 108:4 110:4,9,14 112:14,14 137:8 142:6,19 145:18 meaning 90:2 means 83:20 110:15,19 153:8 meant 97:18 mechanic 21:9 29:8 media 18:1 41:9 medicaid 113:5 medical 13:2 20:19 21:1 28:7 28:8 31:20,21 31:22 104:21 122:17 medically 32:19 71:6 127:13 130:10 medications 13:2 meet 39:22 114:17 131:18 meeting 151:23 meetings 45:2 68:14,16,17,19 69:5,10,11,19 70:8,15 member 34:22 37:10 85:5 103:23 121:23 122:8 123:2	124:20 125:2 139:9 members 105:21 140:1,6 140:11,13 men 144:18 mentioned 63:6 80:18 122:10 130:23 mentor 37:17 37:17 merged 30:6 92:1 messick 4:4 8:20 9:1,5,10,14,17 13:11,17 41:1,7 47:16,22 48:5 50:1 53:3 55:1 55:17 62:22 63:4 65:1 72:5 74:15 78:1 82:3 83:4,8,14 87:18 92:19 96:17 99:18 102:20 103:4,10 123:10 123:16,22 124:3 150:21 151:5,10 151:15,20 152:2 michael 108:19 108:22 michael's 108:22 michelle 2:14 6:12 8:1 153:19
---	--	--	---

microscope 61:9 146:5,6 middle 94:14 126:17 mike 109:6 military 23:12 25:7,21 26:12 26:22 27:17 28:3 31:19 146:20 147:2 milligan 1:17 5:17 78:19 151:15,18 mind 58:17 65:11 89:21 102:10 120:4 133:3 mine 124:2 minister 35:3,5 36:15 ministers 35:11 ministry 39:10 mink 7:8 minute 13:12 41:2 88:10 96:23 142:18 147:7 minutes 62:21 mirrors 124:1 misrepresent 69:15 missionary 35:23 36:18 37:4	mississippi 109:20 misspoke 11:13 misty 7:7 9:17 mobile 67:13 72:17,22 76:12 80:18,22 81:2 87:12,19 88:6,9 88:13,19 89:4 mom 115:22 116:2,3 147:3,4 money 39:1,14 40:2,9,21 92:12 93:14 107:23 128:21 131:11 131:12 132:3 monolithic 138:20 montgomery 2:17 6:20 7:9,12 8:8 16:19 27:4 27:11 34:18 65:22 66:17,18 67:14 87:20 88:9,20 89:1 104:1,2 month 36:5 months 36:20 moore 104:8,14 morning 9:16 mother 147:23 mother's 20:23 motions 17:18 motto 38:11	move 22:23 moved 114:9 122:2 moving 27:17 109:20 mt 35:22 36:17 37:4 multiple 34:13 municipal 128:12 131:22 municipalities 33:17 myron 6:19 151:12	necessarily 68:15 110:10 necessary 2:20 155:9 need 12:16 36:4 38:11 39:6,12 40:17 48:9,12 52:10,18 59:14 59:17 112:16 needed 107:7 needs 89:17,23 100:23 145:8,12 147:12 148:14 neighborhood 54:9 59:11,16 93:11,12 94:5 94:11 neighborhoods 54:16 59:16 neighbors 94:3 neither 153:14 never 19:14 61:5,14,16 77:18 79:12 84:3 105:2 108:7 new 7:4,4 21:23 42:23 43:2 61:8 68:7 76:22 79:5 81:18 93:11 97:18 119:1,6 119:10 news 18:5 64:14 nice 93:13
		n	
		n 2:10 4:1 29:14 141:13 name 9:16 13:18 22:2 29:13,15 35:21 45:13,15 95:7 103:14,20 125:13 135:21 135:22 141:16 names 69:15 natalie 7:18 national 125:18 nationally 138:17 navy 20:22 nco 28:13,14,17 28:21 near 42:5 68:5 147:9	

[nightclub - okay]

Page 176

nightclub 34:9	63:18,22 67:9	official 1:10,20	37:10,13 40:1,7
nikki 137:18,21	67:12,15 68:2	2:6 5:10,20 6:6	40:8,23 41:7,12
137:21	72:18 74:5,6	offs 116:14	44:17 45:6,12
nine 66:2,5	81:5 99:22	oh 14:8 19:1	45:14,21 46:19
ninety 58:22	102:11 103:4	21:19 22:21	49:11 50:15,23
94:6	126:13 144:20	23:7 28:4 30:1	51:1,11,17,20
nod 10:17	nw 6:16	34:4 35:22 60:2	52:2 53:21
noncommissi...	o	63:9 93:16	54:12 55:20
28:22	o 2:10 37:6,7	103:14 114:13	56:6 58:9 63:4
nonelectric	oath 10:1 15:15	118:5 120:21	63:16 64:8 65:5
146:8	124:14	127:3 129:11	65:11,17 66:11
nonpartisan	object 12:2	130:16 136:18	66:23 67:7 68:6
33:17 119:10,11	objection 12:4	okay 8:18 9:5	68:12 69:23
124:18 131:21	52:23 53:9 55:4	9:16 10:3,22	70:7,12 71:2,22
nonwhite 44:18	74:11 87:14	11:8 13:6 14:5	72:21 73:5 74:8
normal 10:4,10	92:13 99:12	14:16,21 15:1,5	75:16,22 76:18
north 6:23	102:16 103:1,8	15:8,11,14,18	78:12 79:14
92:20	objections 2:21	15:22 16:14,21	80:18 81:10,16
northern 1:2	3:1 12:8	18:4,9,22 19:4,5	82:14 83:7
5:2	objects 12:7	19:7,11,16,19	84:13 85:18
notarized	observer 120:16	19:22 20:4,11	86:3,17 88:17
154:10	occasionally	20:22 21:7,16	90:9 91:4 92:18
notary 153:23	12:15	21:20 22:11,13	92:19 93:9 94:8
156:23	offered 3:3	23:10,21 24:3,5	95:8,10 96:3,20
noted 155:4,5	70:10 124:16	24:8,20 25:5,8	100:11,15
notice 3:5	office 2:16 7:6	26:14,23 27:5	102:20 104:3,10
noting 154:7	40:12 104:17,19	27:13,16,23	104:16,18 106:1
number 1:5,15	105:2,4,6,14	28:2,21 29:1,10	107:9 108:12
2:1 4:3 5:5,15	106:4,12 112:6	29:20 30:4,4,11	110:15,18,21
6:1 17:13 44:2,3	117:17 130:6	30:15,22 31:3,9	111:2,15 112:3
66:3 73:20 81:1	135:2,12,17	31:12 32:2 33:3	112:8 113:21
81:3 107:1	officer 28:17,22	33:19,23 34:6,6	114:8,15 115:23
153:21	offices 134:7	34:10,15,22	116:8,18 117:12
numbers 43:10	154:3,10	35:2,4,16,19	118:7 119:6,13
43:23,23 59:1		36:7,11,13	120:3,12 121:10

[okay - past]

Page 177

121:17 122:21 123:6 124:19 125:1 126:9,14 126:21 129:6,16 129:17,23 130:9 136:1,4,12 137:10,19 139:19 140:5,18 141:14,20 143:10,19 149:6 149:8 150:20 oklahoma 22:1 22:2,3,4 25:7,7 old 20:10 116:21 120:16 older 125:14 oldest 147:4 olivetti 146:7 once 28:10 103:16,17 124:11 154:10 ones 21:20 35:2 52:2 67:4 130:17 online 26:5 116:6 ooh 20:9 open 117:3 136:18 opinion 82:14 82:18,21 83:5 84:5 85:7 opportunities 86:20	opportunity 9:21 16:18 29:5 62:18 76:22 79:19,23 92:1 99:22,23 145:16 148:1 oral 8:10 75:19 orally 10:18 ordained 35:3,5 36:15 order 4:22 10:7 53:12 60:15 81:3 96:21 98:12 106:19 ordered 4:22 ordering 154:13 orders 17:16 ordination 35:15 organization 37:22 38:1,23 39:3,7,22 40:17 70:22 118:17,22 119:11 134:18 134:20 137:23 organizations 34:23 37:11 39:9 115:13 122:9 original 48:18 48:21,23 50:3 154:13,15 originates 143:22 144:6	outside 75:15 96:3 135:17 overall 64:12,13 overrated 31:15 overview 142:18 own 32:8 43:4,6 55:11 101:21 143:14 owned 145:23 owner 62:12 <p style="text-align: center;">p</p> p 2:10 packing 49:1 page 4:3 41:22 42:3 72:7 98:17 154:18 155:11 155:14,17,20,23 156:1,4,7,10,13 pages 155:9 paid 34:9 paint 86:16 91:5 palatable 85:16 palmer 51:18 pandemic 38:14 38:15 panel 35:11 75:4 paperwork 115:20 parents 146:15 147:21 parkway 154:21 part 38:7 40:3 68:20 70:23	80:23 134:4 135:9 145:17 participate 143:12 particular 38:1 93:21 105:15 120:5 parties 2:12,23 153:14 154:13 partisan 119:12 parts 80:22 party 69:7 84:19,22,23 85:3,4,6 122:1,7 122:23 123:8,19 123:23 124:12 124:20,23 125:2 128:10,12,17 129:10,14,15,18 129:20 130:1,4 132:15 133:2,10 133:18,21 134:5 134:9,16,23 135:14 136:6,7 136:9 137:11 143:2 parvin 2:15 6:12 8:1 153:19 pass 38:19 passed 72:9 74:10,17,18 125:14 passing 131:15 past 41:12 124:4
--	---	---	--

<p>pastor 36:4,6,8 36:12,21 47:10</p> <p>pastors 35:11</p> <p>patient 20:13,15 21:3 28:7</p> <p>patiently 151:21</p> <p>pay 63:7</p> <p>pdf 154:7</p> <p>peekaboo 75:10</p> <p>peiloff 7:19</p> <p>pen 65:13,13 66:2</p> <p>penn 6:19,19 151:12,13</p> <p>people 31:13 38:4,5,14 40:16 43:12,13,14,20 44:6,10,11 49:5 49:5 55:21 56:1 58:23 59:15 63:12 68:20,23 69:3,6 74:3 81:4 83:11,13,22 84:17,17 86:5,7 86:9 87:6,7,8,9 87:20 88:7 91:1 100:1,4 110:6 110:12 115:7,18 116:8 119:9 121:17 131:18 134:3,19 135:6 136:13,16 137:13 139:18 143:16 144:17 144:23 148:1</p>	<p>percent 52:15 52:16 94:6 100:17</p> <p>percentage 73:16,21 93:1,2 99:20 100:4,14 100:23 144:17 144:19,20</p> <p>perception 133:17 137:14 137:16</p> <p>perry 66:14</p> <p>person 14:13,13 14:14 49:8,9 53:8 62:8 69:20 69:22 117:7,17 118:3,9 141:15 144:15</p> <p>personal 100:20 101:21 109:2 136:10 149:10</p> <p>personally 73:23 118:12</p> <p>perspective 112:9</p> <p>pharisees 87:2</p> <p>philanthropists 40:4,6,13</p> <p>philip 24:12,21</p> <p>philip's 24:10</p> <p>philosophy 133:15</p> <p>phone 45:11</p> <p>phrase 90:17</p>	<p>pick 90:22</p> <p>pickens 66:13</p> <p>picture 104:12</p> <p>pictures 107:21 108:1</p> <p>pittman 18:14 18:23</p> <p>place 6:20 34:12 116:19 117:3,7 120:13</p> <p>places 21:19 34:13</p> <p>plaintiff 42:13 42:22 45:4 46:13,16,20,23 47:9,14 59:14 80:4,6 149:17</p> <p>plaintiff's 151:6</p> <p>plaintiffs 1:8,18 2:4 4:18 5:8,18 6:4,18,21 7:1,5 78:19,20 98:13 151:11,16,18</p> <p>plan 4:16,20 99:15 130:6</p> <p>platform 119:18 119:18</p> <p>play 57:14 63:16</p> <p>played 82:15,22 83:6 84:6</p> <p>playing 75:10</p> <p>please 8:20 9:4 11:1 13:18 42:15 76:3</p>	<p>80:11,13 85:20 89:22 102:9 136:19 149:4,9 149:12 154:10 154:18 155:9,9</p> <p>pleasure 152:1</p> <p>pledge 124:12</p> <p>plight 53:19 54:22</p> <p>pocket 90:22</p> <p>point 11:15</p> <p>polarized 110:16,19</p> <p>policy 120:3</p> <p>political 84:19 84:23 130:15 143:13</p> <p>politician 84:18</p> <p>politicians 84:16 111:20</p> <p>politics 44:22 84:6,12</p> <p>poll 60:23 117:9 118:5 120:16,16 121:4,6</p> <p>polling 116:19 117:3,7 120:13 121:2,13</p> <p>polls 120:20</p> <p>pool 145:22</p> <p>poor 55:3,11,13 86:11,15,19 90:7 91:1</p> <p>population 43:8 43:9 44:1,6</p>
--	---	--	---

[population - quite]

Page 179

52:10,16 61:12 63:16,22 64:9 67:17 93:1 102:12 portion 43:7 position 33:18 83:19,22 84:16 113:14 127:14 127:22 positions 36:14 69:18 posting 42:9 powell 46:8 power 21:8 87:2 practices 144:9 145:3 prattville 31:4 94:9 pray 76:3 praying 76:6 preach 36:9 preacher 36:9 preclearance 58:10 predominantly 38:6 54:1 91:13 94:5,13 prefer 141:21 preliminary 97:12 preparation 16:4 17:1,9,22 prepare 15:18 prerequisite 28:6	present 7:17 16:8 40:11 presenting 69:4 president 136:21 137:22 138:3,5 presidential 138:7 pretty 12:18 91:18 prevented 136:8 previous 97:7 99:16 primary 28:14 principle 131:7 pringle 7:15 print 154:8 prior 3:3 13:23 private 41:22 83:20 103:16 pro 59:3 112:21 112:22 113:1,1 probably 26:21 78:13 88:6 89:2 92:22 94:6 150:9 probate 140:23 problem 22:15 114:23 problems 114:5 114:21 115:4,23 117:6,23 118:2 118:8 120:20 121:20	procedure 8:5 155:6 proceedings 8:12 68:10 77:5 77:17 81:11 process 13:7 68:7,21 115:21 143:13 production 154:20 professional 34:23 37:11 professionals 68:5 69:8 profitable 79:20 program 21:1 37:16 progress 56:17 proper 52:18,19 52:21 53:4 76:5 89:10 properly 43:9 54:20 150:19 protective 38:20 proud 109:16 proudly 114:1 prove 101:8 provide 99:8,10 128:20,21 129:1 provided 8:4 providing 131:10 public 41:22,23 42:2 70:14 75:22,23 106:19	145:22 153:23 156:23 purple 91:20 pursuant 155:6 pushed 116:4 put 42:5 60:15 65:15 70:5 91:20 93:3 112:2 136:8 147:6 150:11 putting 42:16 131:13
q			
qualifications 119:22 135:8 qualified 109:10 120:1 136:23 qualities 92:2 question 10:12 10:14,23 11:8 11:17 12:4,7,10 12:20,22 42:7 76:15 83:3 89:21 110:18 questions 2:22 2:23 9:23 13:7 35:12 150:22,23 151:3,7,8,11,13 151:16,18,22 153:7 quickly 12:18 12:23 quite 110:17 144:1			

[quo - remember]

Page 180

quo 82:19,20 83:18 quoted 44:4	read 9:3,8,11 11:6 51:6 73:13 111:13 154:6 155:2	reception 137:2 recess 63:1 123:13 recognize 72:10 78:3,5,8,16 recommend 98:7 recommended 98:19 reconstruction 60:23 61:2 record 13:15,18 41:2,5,8 47:17 47:20,23 62:9 63:5 113:23 123:17 152:3 records 28:7,9 recruit 46:15,18 135:1 recruited 135:4 recruiting 135:9 rector 7:3 red 91:17 redistricting 9:19 43:3 52:6,7 52:18 63:17 68:1 redraw 75:6,9 redrawing 43:3 redrawn 76:16 reed 61:1 120:17 130:23 132:16 133:5 reelection 32:14 128:2 132:12	reentered 23:12 refer 57:4 reference 65:4 referring 96:4 reframe 89:20 refreshed 15:20 regions 64:11 register 114:2 115:8,16,19 116:6 registered 113:21 114:15 115:2 116:2 registering 114:5,22 115:5 116:1 registration 114:10,12 rejected 97:5,7 related 45:19 76:9 143:21 relationship 110:12 relief 4:9,12 99:8,10 remain 56:10 83:23 84:15 87:2 remained 22:11 remaining 32:6 remedial 4:18 4:23 remember 14:18 17:3 21:21 42:9,16
r			
r 139:17,17,18 139:18 153:1 race 82:15,22 83:5 92:12 93:3 118:12 133:5 139:22 140:8,16 142:23 racial 110:21,22 racially 94:12 110:16,19 raise 40:9,12 124:16 raised 19:5 ran 32:15,15,16 32:16 128:9 132:7,11,19 137:22 rashawn 141:10 141:10 rata 59:3 rate 59:3 62:16 rather 59:6 83:12 134:17 146:20 raw 59:1 67:11 67:14 raymond 140:19 reach 60:13 reaching 65:12	reading 18:2 51:20 82:13 reagan 124:15 130:20 real 10:11 109:11 realize 11:12 90:10 really 10:9 55:9 86:2 146:2 reason 13:1 32:19 50:11 66:21 155:13,16 155:19,22 156:3 156:6,9,12,15 reasons 15:20 155:8 recall 15:17 17:5 45:7 48:16 51:10 77:12 103:20 143:18 receive 40:21 45:11 54:17 129:21 144:15 received 54:11 receiving 36:21 61:7 recent 31:17 133:11 recently 114:10		

[remember - roderick]

Page 181

42:20 50:13,22 51:3,20 52:2 54:2,4 58:5 69:9 71:2,13 77:10 95:7 105:11,13 105:15,17,17,18 106:11,13,21 120:19 123:3 126:13 130:22 141:16 remind 126:22 reminding 135:6 remote 68:13 69:21 removed 57:20 58:4 120:8 renamed 57:20 repair 21:9 repeat 11:5 repeating 76:17 rephrase 11:1 102:9 replace 127:16 report 52:9 96:8 96:10 101:10,11 reporter 6:13 8:2,18 10:5 11:6 153:20 reports 17:19 18:6 51:6 represent 9:17 43:13 49:5 53:16,17 59:19 59:20,20 72:8	72:19 78:3 82:5 100:1 103:12 109:22 150:19 representation 52:19,21 53:5 64:1 76:6 79:20 86:4 representative 7:15 52:22 53:7 54:23 69:13 83:11,12 97:8 106:22 107:11 107:13 109:14 111:12 representatives 85:2 149:22 represented 43:9 55:2 represents 103:11 153:10 republican 84:22 85:3,6,8 124:6 125:2,6 125:19 141:21 143:2 republicans 85:8 124:21 130:21 138:10 143:3,6,7 requested 154:6 required 60:15 102:23 103:7 reside 67:9 residential 18:19	residents 87:11 87:13,19 90:13 93:18 100:5,6 resign 126:20 resolved 15:9 resources 61:15 125:17 128:22 132:4 145:16,18 145:20 respect 67:23 respective 2:13 respond 74:13 121:1 responses 10:19 responsibility 135:1 154:6 rest 150:1 restate 103:3 restored 144:21 145:1 result 153:16 results 76:4 retire 32:19 130:10 retired 31:11,17 127:13 retirement 113:17,18 retracted 56:19 returned 154:12 154:15 review 77:7 154:7 reviewed 77:11	revisit 58:7 revisited 52:12 richard 7:8 116:20 richest 92:22 right 18:20 19:4 23:16 24:4 26:1 26:4 28:23 29:4 29:12 30:3 32:13 40:4 44:19 45:23 46:1 51:5 57:7 60:16 72:21 73:6,10 74:23 77:3 88:3,23 90:4 94:10 95:1 95:15,19 96:2 97:14,20 99:6 100:7,20 104:9 106:8 119:8 120:4 122:12 124:11 126:8 130:2 133:19 140:2 141:17 142:13 144:23 145:6 147:17 rights 56:12 57:11,19 87:1 112:20 144:16 144:21 148:10 roads 54:10 roby 103:21,22 roby's 105:4,14 roderick 139:21
---	--	---	---

rodney 46:6 rogers 140:19 role 82:15,22 83:5 84:6 122:14 123:4,7 135:12,13,17 roles 122:22 ronald 2:14 8:9 8:14 13:19 81:19 124:15 154:2 room 54:6,6 93:8 134:11 roots 56:3,4 roses 91:17,17 91:20,20,21,21 rule 12:19 76:7 155:6,7 ruled 61:11 76:19 79:4 81:13 82:11 rules 8:4 10:4 run 116:14 126:1 128:14 130:6 135:5,5 135:12,17 138:2 rundown 146:8 running 112:5,6 runs 114:18 rural 43:8	sadasivan 7:3 151:17 sadducees 87:2 saith 152:4 san 21:13 23:9 23:10 24:11 sat 146:23 sausage 85:15 85:16 134:11 savvy 42:6 saw 17:23 52:15 60:23 61:3,3,7 61:15 saying 22:8,21 49:7 53:6 56:2 59:7 64:3 66:6 71:13 80:12,14 98:12 106:23 108:1 112:7,15 112:16 113:8 125:15 138:20 142:20 148:7 scars 120:21,22 school 23:17,19 23:21 35:6,9 37:18 39:9 54:10,12 61:7,9 61:13 146:4,6 146:10,14 schooled 120:23 121:8 schools 39:8 seaborn 6:19 seal 154:12	second 21:2 22:18 42:23 43:2 126:18 132:19 149:4 secondhand 54:11 seconds 47:17 secretary 1:12 1:21 2:8 5:12,21 6:8 7:10 9:18 98:15 section 57:13 58:3 see 48:14 50:6 54:19 55:10 56:11,12,16,21 56:23 57:17 59:12 61:18,18 65:15,23 66:2 72:17,21 73:17 80:8 91:9,17 104:11 111:17 142:12,15 seek 128:2 seeking 99:11 seemed 45:10 59:6 75:9 seems 137:12 seen 48:7 49:16 54:13 56:18 62:10,12,13 71:10,11,12,14 96:10 97:1 99:1 101:13	segregated 54:8 54:11 sell 34:12 selma 45:23 semester 25:17 26:21 semesters 27:12 senate 84:21 132:9 senator 7:14 32:5 69:14 138:23 send 81:20 125:18 154:13 sending 75:11 109:21 senior 117:19 sense 84:4 separate 36:13 126:14,15 separated 126:16 sergeant 28:11 serious 36:10 124:14 145:21 sermon 35:13 servant 47:12 serve 38:11 122:14 served 32:6 33:9 120:6 122:18,19 123:4 126:7 service 37:19 services 53:15 86:12
s			
s 2:10 7:7 9:17 35:22 sacrifices 148:5			

[serving - special]

Page 183

serving 31:22 34:3 38:2 45:8 set 83:23 setting 15:15 115:11 143:13 settle 108:20 seven 52:16 66:1 seventeen 32:17 32:20,22 33:1 58:18 127:8,10 seventy 60:19 147:17 several 25:4 26:9 36:3 69:11 71:11,12,14 105:8 108:9 119:16 sewage 58:21 shape 146:19 share 30:12 86:9 she'll 12:13 shelby 57:5,7,8 57:10 92:16,17 92:21 93:4,14 93:17 94:22 144:8 sheriff 140:18 shoes 59:11 shomari 108:21 109:5,7,22 147:19 148:8 short 28:1 62:21	show 48:6 49:11 shown 137:7 sick 117:19 side 54:18 siegleman 127:1 sign 9:3,8,11 57:15 104:12 124:12 154:6 signature 153:18 154:2,16 156:18 signed 74:21 154:10,12,15 significant 67:21 118:13 signs 131:14 silla 35:22 36:17 37:4 similar 59:16 86:5 simply 67:14 singleton 1:7 5:7 46:13,23 151:10 sir 13:17 63:20 103:13 111:10 149:5,18 151:4 sister 55:19 sisters 56:4 90:8 148:20 sit 14:16 17:21 42:8 59:10,10 72:15 107:9 149:18 150:14	six 20:6,7 21:17 66:1 skimming 51:23 skin 55:12 skip 65:22 slowly 56:19,19 57:20 small 59:4 91:16 117:10 smart 103:9 109:12 smile 109:6 121:9 smith 2:14 8:9 8:14 13:19 29:15 81:20 151:21 154:2 snapshot 64:13 snippets 62:17 113:10 soapbox 53:20 social 41:9 socializing 118:6 soil 38:4 sold 34:4 62:11 solely 130:9 somebody 40:2 45:3 108:13 135:11,16 someplace 92:7 son 31:4,5 94:8 94:16,17 95:3 soon 114:4 116:3	sorry 16:1 22:12 22:13 25:13 74:18 77:14 83:2 88:11 123:20 129:16 149:6,13 sort 15:15 88:8 sorts 132:2 sound 101:12 120:7 135:21 147:7 sounded 29:1 66:4,16 sounds 27:16 31:13 south 119:2,6 119:10 southbridge 154:21 southeast 154:18 southern 1:3 5:3 125:7 speak 10:9,12 10:18 40:12 44:9 46:19 58:7 61:20 70:7 81:10 149:23 speaking 63:14 84:9 86:3 89:12 110:9 112:10 115:12 129:14 special 96:1,8 96:22 97:4 98:5 98:19 116:16
---	--	---	---

[specialist - supported]

Page 184

specialist 28:8,9 specific 70:5 111:9 specifically 66:17 84:8 specifics 105:19 speculation 55:5 87:15 92:14 speculative 55:16 spell 139:13,17 141:12 spelled 139:18 spells 139:16 split 20:2 126:8 spoke 46:17 sponsor 38:21 sponsored 40:5 129:3 springs 18:16 18:23 24:1 27:2 31:23 35:20 37:1,8 50:12 103:20 106:18 116:22 117:10 127:21 139:20 140:14 squeeze 120:9 st 24:10,12,21 31:1 stacking 49:1 staff 35:18 stand 32:14 150:12	start 10:14 13:8 20:7 88:10 started 117:15 starting 21:17 state 1:12,22 2:8 5:12,22 6:8 7:7 9:18 13:18 26:11 32:4 37:23 40:21 43:11 44:1 63:23 74:19,20 92:11 97:7,8,8 98:14,15 102:6 102:21 109:22 113:13 123:7 125:18 129:17 129:21 130:4 131:7 134:9 138:22 139:8 145:7,11 148:13 153:3 stated 90:6,18 91:12 134:17 statement 155:8 statements 11:20 70:15 75:23 states 1:1 5:1 8:5 19:21 26:7 40:6 56:15,15 57:3,4 75:17 76:11 132:7 155:7 statewide 131:3 134:7	status 82:19,19 83:18 stay 20:1 25:13 stayed 23:7 stenotype 153:7 stepped 122:17 stepping 105:1 stick 31:13 stickler 120:10 stint 20:8 21:2 22:16,18 stints 22:5 stipulated 2:11 2:19 3:4 stipulation 8:6 stipulations 8:19,22 9:7 stone 116:20 stood 69:13,17 story 61:20,21 142:4 straight 14:19 93:23 strange 50:10 strategically 62:5 street 6:23 7:3 strength 133:18 strike 77:14 strong 133:22 stronger 134:1 struggles 86:12 133:10 148:9 study 113:8	studying 24:23 27:5 styled 50:2 submit 70:18,21 71:15,17,19 77:13,15 80:16 81:16 submitted 77:8 78:22 79:8,15 80:9,12,15 82:8 subscribed 156:19 subservient 91:7 substance 155:7 sued 14:13,13 73:9 74:22 97:12 suing 14:15 suite 6:17 154:21 sumter 65:20 66:13 super 109:12,12 support 107:11 107:12,15,19 109:7 118:12 124:13 128:10 128:18,21 129:7 129:12 131:9 132:6,11 138:3 138:17 143:6,7 supported 130:1 131:20 132:2
---	---	---	---

[supporting - think]

Page 185

supporting 131:5	table 61:19 66:21	43:4,18 50:19 51:3 61:19,20	thank 10:22 13:6,20 65:18
supportive 131:7	tactics 121:7	65:7,9 79:9	83:7 109:4
supposed 104:23 121:7	take 12:15,18,20 12:22 13:11	84:13 97:1	112:4 117:20
supreme 75:17 76:1,7,11,19	38:10 48:11	104:6 111:15	149:11 150:2,6
79:4 81:13	62:21 63:13	113:22 120:21	151:3,5,14,19
82:10 91:8	96:23 107:21	122:15 133:13	151:20
95:13 97:5,6,16	123:10 124:14	142:3,6 149:20	theirs 62:14
sure 10:18 11:7	131:17 149:9	150:12,15	theresa 127:17
38:14,15 48:10	taken 2:14 63:2 113:2 123:14	telling 12:5 42:12 63:12	thereto 3:3 153:8
62:22 64:4 70:6	153:6	temporary 36:13	thing 88:8
93:21 99:3	talk 16:3 92:6	ten 14:8 33:5	things 18:6 50:14 55:13
113:2,4 121:4	talked 16:3,11 23:14 40:1	39:19 40:12	56:7,9,9,10,23
150:18	107:3,4 108:9	52:8 66:2,5	57:17 58:10,12
survive 146:16	132:18 149:21	tenacity 109:13	58:14 59:13,13
sweep 142:2,5,8 142:22,23	150:16	tend 86:11	60:20 61:23
sweet 127:19	talking 18:5 43:16,18,20,23	tenure 136:18	62:6 64:14
swimming 145:22	55:20 56:1 57:5	term 32:1,6,8,11 32:18 75:5,11	73:13,14 80:17
sworn 8:15 156:19	62:2 70:1 100:3	85:20 108:3,7	89:3,15 105:8
system 61:7 113:18	111:23 132:3	126:5,12,18,19	105:11,13
systemic 56:20	147:13	128:2	106:11 110:7
systemically 84:1	tall 127:20	terms 126:7,16 131:9	112:21 129:4
t	tally 38:17	terrible 106:15	131:15 132:3
t 2:10,10 29:14 153:1,1	tangible 128:21	terry 104:6	146:2,3,18
tabitha 132:22 132:23 133:7	tape 121:3	testified 8:16 15:11,14	147:7,9,11
	tatum 141:3,3	testify 13:3 150:12	149:3 150:14
	tea 111:13	testimony 9:22 11:22 153:11	think 11:16 13:5 14:1,19,19 17:5
	teach 29:7	155:2,7	17:20,23 19:2
	television 18:1,5		22:2 23:2 26:5
	tell 16:14 30:22 39:16 42:15		27:15 42:11
			43:11 44:4,5,7
			44:14 45:17

[think - twelve]

Page 186

47:8,13 52:8,14 52:15 57:12,12 57:15 61:10 62:19 64:10 66:10,12,15 72:16,23 73:2 75:3,3 76:12,15 76:17 78:8,15 79:14 81:2 83:10,16 86:10 89:17,23 90:5 90:12 103:17 104:9 107:1,10 108:5 109:9,10 109:13,18 111:2 112:11 113:14 121:20 122:2,3 126:3,10 129:7 132:21 133:14 133:23,23 134:1 134:2,8,10,12 134:12,15,18,20 135:6 136:12,23 137:1,17 138:6 143:1,11 145:5 145:6 146:22 149:22 150:3,14 thinker 47:11 thinking 45:21 68:17 86:7 89:9 111:16 150:7 thirteen 38:6 66:15 thirty 19:2,3 29:23,23 34:7	47:17 60:19 114:9 121:4 thomas 46:10 61:1 120:17 130:23 thought 14:6 23:3 59:9 101:2 119:23 125:6 129:13,14 thoughts 136:20 thousand 39:20 39:21 40:13 three 13:12 30:7 30:12 66:1 96:9 122:19 140:10 throw 67:12 ticket 124:13 131:5,8 136:22 tied 109:19 time 3:2,2 12:2 12:3,3 20:2,2,5 21:14 22:10 23:23 32:23 39:2 45:7 51:12 56:22 59:4 60:12 71:4 72:12 104:6 105:10 118:14 121:15 122:8 132:3 136:4 142:9 143:2,17 151:19 154:15 times 39:1 108:9 124:4	today 10:10,16 11:15,21,23 13:3 15:19 17:21 23:14 29:11 42:8 54:14,14 72:16 103:11 107:9 108:9 127:23 138:13 143:20 144:4 146:19 149:18 150:3,16 151:3,21 today's 107:13 together 92:1,2 95:1 134:22 told 16:16 42:17 42:21 86:10 122:16 125:19 126:22 127:6 tone 55:12 tongue 85:17 top 50:7 133:4 total 32:16 totally 39:19 58:7 touch 55:21 113:16 town 54:18 119:17 tragedy 106:16 training 21:23 26:22 28:2,13 28:14,18 transcribed 153:8	transcript 153:11 154:7,13 154:15 155:2 transcription 153:9 transferred 25:12 transportation 149:3 trial 3:2 98:3 150:11 trick 29:22 troy 26:11,14 truck 21:10 true 138:12,16 145:17 153:10 truly 61:20 trump 137:23 truth 51:4 104:7 truthfully 13:3 try 10:11 57:14 101:8 trying 14:18 85:8 104:5,11 111:7 132:21 142:14 turn 39:18,21 113:16 125:10 turned 62:12 147:17 tuskegee 31:21 33:4,10 twelve 33:6,8 37:23 44:23 120:15
--	--	--	---

[twentieth - vfw]

Page 187

twentieth 38:3 twenty 39:21 52:14,16 60:19 62:20 111:3 118:21 143:10 148:14 149:1 twice 32:1 40:1 40:15,15 two 14:1 17:6 19:3 20:3 22:5 22:16,18 27:12 29:23 31:1 32:1 61:1 65:10 66:1 100:16 101:15 121:5 122:19 126:7,14,15,16 126:17 142:18 146:7 type 38:18 121:6 146:1 typewriters 146:7 typing 28:6	97:11,17,23 98:2,6,11,20 100:10 101:7 102:14 106:2,10 108:18 110:3 111:5 127:9,9 128:16 130:5 132:10 141:18 147:5,15,18 148:12 unable 117:19 under 9:23 15:15 undersigned 155:2 understand 9:21 10:1,23 11:7 37:20 43:5 48:20 53:18 54:22 67:6 74:8 78:6 84:20 85:1 110:17 133:21 142:14 understanding 23:1 48:17 52:5 52:7 57:9 58:2 63:19,21 64:2,7 68:1 76:8,14 80:14 85:23 90:23 undertook 68:7 unimportant 147:8 union 18:16,23 23:23 27:2	31:23 35:20 37:1,8 50:12 103:19 106:18 116:21 117:10 127:20 139:19 140:14 unique 89:18 90:1 uniquely 109:10 136:23 united 1:1 5:1 8:5 19:21 26:7 40:6 56:15,15 57:2,4 75:17 76:10 132:7 universities 26:9 27:1,14 university 25:6 25:16,19,20,22 26:6,9,10,11,20 27:3,10 37:16 37:18 113:7 unresponsive 145:8,12 148:14 update 68:22 114:11 updated 114:10 upheld 97:16 upper 94:13 upset 19:2 urinalysis 28:17 use 91:15,16 98:15 112:7 115:14,15,16 131:13 155:9	used 57:18 62:1 83:10 98:5 111:19 112:13 143:2 144:10 145:3 146:8 using 41:15 62:4 90:17 usual 8:18,21 9:6 usually 141:21 utilize 62:17 utilized 78:9 93:4 utopia 59:9
v			
u 2:10 29:14 uh 12:12 17:2,7 19:8 20:16 22:17 26:15 29:6 30:17 46:14 49:13 50:4 68:8 73:8 73:10 76:20,23 78:21 79:1,3,6 80:21 88:14 90:15 92:9 96:7			v 57:5,6,10 va 31:21,23 33:4 33:10 34:1 104:20 validity 86:14 various 21:19 115:12 vehicle 21:9 veritext 154:10 154:20 veritext.com 154:18 versa 56:16 versus 56:15,15 57:7 84:17 113:1 144:8 vet 118:19 134:16 vfw 105:1

[vice - witness]

Page 188

vice 56:16 132:19 136:20 138:3,4 view 82:7 views 100:22 visit 92:21 volunteer 37:12 37:13 volunteers 128:22 vote 55:13 58:1 90:13 113:22 114:22 115:2,5 115:8,17,19 116:2,4,6,11,13 117:4,12,16,17 117:21 118:19 118:20 119:15 121:18 124:21 129:4 138:13 voted 107:22 119:16 124:4,6 124:14,16 voter 114:10,12 114:16 voter's 56:12 57:11 voters 81:2 101:16 111:8,8 119:2,5 134:21 134:21 137:14 138:13,17 141:21 143:5 144:11 145:4	voting 55:11 73:16,20 99:20 100:5,9 117:6 117:23 118:3,9 143:21 144:5,9 145:2 vra 4:18 vs 1:9,19 2:5 5:9 5:19 6:5	150:15 wanted 42:2 70:16 99:9 107:11 125:20 128:1 136:5 wanting 86:4 108:10 washington 2:16 6:17 7:8 8:8 75:20 watcher 120:16 water 13:10 54:7 58:21 70:11 way 12:6 48:9 56:20 101:18 142:12 145:19 ways 145:7,11 148:12 we've 43:15 62:19 64:12 143:20 wealth 54:20 wealthy 55:3 wear 38:19 welcome 136:13 136:17 welcomed 70:9 70:10 wendell 46:10 136:1 went 14:19,23 19:23 20:23 21:8,22 23:18 25:6 33:12	68:14,15 75:17 76:10 97:15 146:22 wes 1:10,20 2:6 5:10,20 6:6 7:10 9:18 western 65:19 wheel 21:9 white 44:13 54:6,12 55:3,19 56:4 90:13,19 91:1,8 93:2 94:13 111:7 112:17 119:21 124:4,17 125:22 125:23 127:4,20 132:4 136:13,16 139:6,7 140:10 140:20 141:20 143:5,9 148:2 wife 16:13,15 19:1 50:16 91:19 94:16 114:15,17 118:3 130:13 wife's 29:12 wilcox 65:21 66:14 wish 13:9 99:22 100:13 109:4 114:17 150:5 wished 29:9 witness 8:10 11:10 152:1 153:12 154:18
	w w 13:19 wait 10:11,13 88:10 89:19,19 89:20,20,20 waiting 54:6,6 waived 3:6 walk 146:10 walker 7:12 9:3 9:6 46:12,15,22 47:8 83:2,7 123:20 151:2 walls 7:18 want 9:11 11:7 11:14,16,17,20 12:9 33:6 44:4 49:7 50:18 53:20 59:9,19 64:4 65:13 69:14,15 70:4,5 71:7 78:16 86:15 91:5 98:14 101:22 108:15,16 120:8 134:14 135:5,5 149:20 150:1,2		

[witnessed - youth]

Page 189

witnessed 54:21	worse 62:14	118:21 120:15
woke 149:15	wrong 22:22	122:20 125:4,5
woman 29:17	44:7 82:7 97:6	126:6 127:8,11
women 137:13	142:19,20	133:11 143:10
women's 112:20	x	146:19 147:14
won 32:16,16,16	x 4:1	148:15 149:2
126:10,11,13	y	yellow 91:20
wondering	y 139:17,18	yeoman's
17:19	yeah 9:6 26:18	149:23
word 57:2 62:1	30:17 34:11	yolanda 135:19
91:15 108:6	42:21 51:23	york 7:4,4
112:7,12,19	53:11 55:6 60:5	young 103:18
135:3	60:10 66:8	137:13
words 43:4,6	72:13 74:14	youth 39:7
53:16 62:4,5	78:15 88:2	115:13 148:18
75:11 111:19,22	89:16 90:12	
112:16	109:1,3 126:3	
work 20:18	127:3 138:19	
33:16,22 38:21	140:7 141:18	
92:20 95:5	year 18:9,11	
worked 20:18	20:7 22:16,18	
33:10 34:5,11	24:22 38:3,12	
36:1,19 60:23	41:20 50:8	
69:7 120:12	54:12 71:5,8	
121:13	81:11 147:17	
worker 148:10	years 14:8 19:3	
workers 117:9	20:3,6 21:17	
working 34:1	26:18 29:23	
37:15 110:5	32:17,20,22	
112:6	33:1,5,8 34:7	
world 92:5	52:8,20 53:6	
148:17 150:5	58:19 64:11	
worldwide	71:7 90:18	
26:16	111:3 114:9	

Alabama Rules of Civil Procedure

Part V. Depositions and Discovery

Rule 30

(e) Submission to witness; changes; signing. When the testimony is fully transcribed the deposition shall be submitted to the witness for examination and shall be read to or by the witness, unless such examination and reading are waived by the witness and by the parties. Any changes in form or substance which the witness desires to make shall be entered upon the deposition by the officer with a statement of the reasons given by the witness for making them. The deposition shall then be signed by the witness, unless the parties by stipulation waive the signing or the witness is ill or cannot be found or refuses to sign. If the deposition is not signed by the witness within thirty (30) days of its submission to the witness, the officer shall sign it and state on the record the fact of the waiver or of the illness or absence of the witness or the fact of the refusal to sign together with the reason, if any, given therefor; the deposition may then be used as fully as though signed unless on a motion to suppress under Rule 32(d)(4) the

court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

(F) Certification and filing by officer; exhibits; copies; notice of filing.

(1) The officer shall certify on the deposition that the witness was duly sworn by the officer and that the deposition is a true record of the testimony given by the witness. Unless otherwise ordered by the court, the officer shall then securely seal the deposition in an envelope indorsed with the title of the action and marked "Deposition of [here insert name of witness]" and shall promptly file it with the court in which the action is pending or send it by registered or certified mail to the clerk thereof for filing.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.