

Page 1

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF ALABAMA  
3 SOUTHERN DIVISION  
4

5 BOBBY SINGLETON, et al.,

6 Plaintiffs, CASE NO.:

7 v. 2:21-cv-1291-AMM

8 WES ALLEN, in his official THREE-JUDGE COURT  
9 capacity as Alabama Secretary  
10 of State, et al.,

11 Defendants.

12 -----  
13 EVAN MILLIGAN, et al.,

14 Plaintiffs, CASE NO.:

15 v. 2:21-cv-01530-AMM

16 WES ALLEN, in his official THREE-JUDGE COURT  
17 capacity as Secretary of  
18 State of Alabama, et al.,

19 Defendants.  
20 -----  
21

22 Singleton v. Allen  
23 2:21-CV-01291-AMM-  
Date 2/10/2025  
Plaintiff Exhibit Label No. 50

<p style="text-align: right;">Page 2</p> <p>1 MARCUS CASTER, et al.,  2 Plaintiffs, CASE NO.:  3 v. 2:21-cv-01536-AMM  4 WES ALLEN, in his official  5 capacity as Alabama Secretary  6 of State, et al.,  7 Defendants.  8 -----  9  10  11  12 S T I P U L A T I O N  13 IT IS STIPULATED AND AGREED by and  14 between the parties through their respective  15 counsel, that the deposition of LEONETTE W.  16 SLAY, may be taken before STACY MAYS,  17 Commissioner, via Zoom, at 9:00 a.m. Central  18 Standard Time, on July 16, 2024.  19  20 DEPOSITION OF LEONETTE W. SLAY  21  22  23</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X  2 EXAMINATION BY: PAGE NUMBER:  3 Mr. Seiss 7 - 86  4 Mr. Taunton 86 - 104  5  6  7 EXHIBITS PAGE NUMBER:  8 (Defendant's Exhibits)  9 Exhibit 1 (2021 Map) 40  10 Exhibit 2 (Notes) 87  11  12  13  14  15  16  17 A P P E A R A N C E S  18  19 Mr. Benjamin M. Seiss, Assistant  20 Attorney General; Office of the Attorney  21 General, State of Alabama, 501 Washington  22 Avenue, P.O. Box 300152, Montgomery, Alabama  23 36130-0152 (Via Zoom)</p>
<p style="text-align: right;">Page 3</p> <p>1 IT IS FURTHER STIPULATED AND AGREED  2 that the signature to and the reading of the  3 deposition by the witness is waived, the  4 deposition to have the same force and effect  5 as if full compliance had been had with all  6 laws and rules of Court relating to the  7 taking of depositions.  8 IT IS FURTHER STIPULATED AND AGREED  9 that it shall not be necessary for any  10 objections to be made by counsel to any  11 questions except as to form or leading  12 questions, and that counsel for the parties  13 may make objections and assign grounds at the  14 time of the trial, or at the time said  15 deposition is offered in evidence, or prior  16 thereto.  17 IT IS FURTHER STIPULATED AND AGREED  18 that the notice of filing of the deposition  19 by the Commissioner is waived.  20  21  22  23</p>	<p style="text-align: right;">Page 5</p> <p>1 Mr. Soren A. Geiger, Assistant  2 Solicitor General; Office of the Attorney  3 General, State of Alabama, 501 Washington  4 Avenue, P.O. Box 300152, Montgomery, Alabama  5 36130-0152 (Via Zoom)  6  7 Mr. Michael P. Taunton, Attorney at  8 Law; Balch &amp; Bingham, LLP, P.O. Box 306,  9 Birmingham, Alabama 35201 (Via Zoom)  10  11 Mr. James U. Blacksher, Attorney at  12 Law; 300 21st Street North, Birmingham,  13 Alabama 35203 (Via Zoom)  14  15 Mr. Myron Penn, Attorney at Law;  16 Penn &amp; Seaborn, LLC, 1971 Berry Chase Place,  17 Montgomery, Alabama 36117 (Via Zoom)  18  19 Mr. U. W. Clemon, Attorney at Law;  20 2025 3rd Avenue North, Suite 500, Birmingham,  21 Alabama 35203-3331 (Via Zoom)  22  23</p>

<p style="text-align: right;">Page 6</p> <p>1 I, STACY MAYS, a Court Reporter of  2 Florence, Alabama, acting as Commissioner,  3 certify that on this date, as provided by the  4 Federal Rules of Civil Procedure and the  5 foregoing stipulation of counsel, there came  6 before me via Zoom, beginning at 9:00 a.m.  7 Central Standard Time on July 16, 2024,  8 LEONETTE W. SLAY, witness in the above cause,  9 for oral examination, whereupon the following  10 proceedings were had:  11  12  13  14  15  16  17  18  19  20  21  22  23</p>	<p style="text-align: right;">Page 8</p> <p>1 detect a nonverbal response. Does that make  2 sense?  3 A. Yes.  4 Q. If you don't understand any of my  5 questions, please let me know, and I'll try  6 to ask them again in a more clear manner so  7 that we can stay on the same page. Sometimes  8 a witness gives an answer and then later in  9 the deposition realizes that she forgot  10 something or misspoke. If you need to add or  11 correct any of your testimony during the  12 course of this deposition, please let me  13 know. Also to help the court reporter, I  14 will try not to talk over you and ask that  15 you do the same. We should both wait until  16 the other is done speaking. That's  17 particularly important in this Zoom format  18 because there could be a delay in either of  19 us speaking. We will occasionally take  20 breaks. If you need a break, please let me  21 know, but if there's a question pending, I'll  22 need you to answer the question before we  23 break. Is there any reason that you cannot</p>
<p style="text-align: right;">Page 7</p> <p>1 LEONETTE W. SLAY,  2 being first duly sworn, was examined and  3 testified as follows:  4 EXAMINATION  5 BY MR. SEISS:  6 Q. Good morning, Ms. Slay. My name is  7 Ben Seiss. I'm an attorney with the Alabama  8 Attorney General's Office. I represent the  9 Alabama Secretary of State Wes Allen in this  10 lawsuit filed by the Singleton plaintiffs.  11 I'm going to be asking you some questions  12 today about this lawsuit. This deposition is  13 an opportunity for us to record your  14 testimony in this matter. There is a court  15 reporter here, and she'll be creating a  16 transcript of everything that is said.  17 Because we need her to create an accurate  18 transcript, it is important that you answer  19 questions "yes" or "no" rather than by  20 shaking your head or with a more informal  21 "uh-huh" or "huh-uh." That would be  22 particularly true in this virtual format  23 because the court reporter may not be able to</p>	<p style="text-align: right;">Page 9</p> <p>1 provide truthful and complete testimony here  2 today?  3 A. No.  4 Q. Okay. That is all of the ground  5 rules. Do you understand everything that  6 we've gone over?  7 A. Yes.  8 Q. Do you have any questions before we  9 start?  10 A. No.  11 Q. Please state your name.  12 A. Leonette Walker Slay.  13 Q. Ms. Slay, where are you today?  14 A. I am in the law offices of Whatley  15 Kallas in downtown Birmingham.  16 Q. Is there anyone in the room with  17 you?  18 A. Yes.  19 Q. Who is that?  20 A. Lawyers for the plaintiffs in this  21 lawsuit.  22 Q. Do you have any documents with you?  23 A. Yes.</p>

<p style="text-align: right;">Page 10</p> <p>1 Q. What documents do you have with 2 you?</p> <p>3 A. I have some personal notes that I 4 have taken with some specific data on it so 5 that I am accurate in my testimony.</p> <p>6 Q. Have you ever been deposed before?</p> <p>7 A. Yes.</p> <p>8 Q. When was that?</p> <p>9 A. In August 2023, in this lawsuit.</p> <p>10 Q. Was that an in-person deposition?</p> <p>11 A. Yes.</p> <p>12 Q. Have you ever testified in court?</p> <p>13 A. Yes.</p> <p>14 Q. When was that?</p> <p>15 A. That was during my military career. 16 I testified in court in Fort Benning, 17 Georgia.</p> <p>18 Q. What was that about?</p> <p>19 A. It was about the mismanagement of 20 funds by an army person.</p> <p>21 Q. What have you done to prepare for 22 this deposition?</p> <p>23 A. Well, I've had some years of</p>	<p style="text-align: right;">Page 12</p> <p>1 two academics and our own pleadings.</p> <p>2 Q. Beside your lawyers, did you talk 3 to anyone else about this deposition today?</p> <p>4 A. No.</p> <p>5 Q. What year were you born?</p> <p>6 A. 1950.</p> <p>7 Q. Where do you currently reside?</p> <p>8 A. 320 Albemarle Drive, Hoover, 9 Alabama 35226.</p> <p>10 Q. Who is your current congressional 11 representative?</p> <p>12 A. Well, it is now Representative 13 Terri Sewell, after the Milligan case.</p> <p>14 Q. So, before that it was 15 Representative Gary Palmer?</p> <p>16 A. Yes, it was.</p> <p>17 Q. When Representative Palmer was your 18 congressperson, had you ever reached out to 19 him?</p> <p>20 A. Yes.</p> <p>21 Q. When was that?</p> <p>22 A. I have emailed his staff a couple 23 of times, but most recently it was last</p>
<p style="text-align: right;">Page 11</p> <p>1 experience in voter outreach as a volunteer, 2 and I have read the pleadings from both the 3 defendants and the plaintiffs in this case. 4 I have read the testimony of expert witnesses 5 by the plaintiffs, and I am just generally 6 aware of various initiatives within the 7 Alabama legislature and the state government 8 regarding voting and voting outreach.</p> <p>9 Q. Did you look at any maps in 10 particular?</p> <p>11 A. In 2023, I did. I have not looked 12 at any recently.</p> <p>13 Q. You mentioned that you've read some 14 of the pleadings in this case. What pleadings 15 are you referring to specifically?</p> <p>16 A. The pleadings in which the State 17 asked that this lawsuit be dropped that was 18 decided last week by a three-judge federal 19 panel.</p> <p>20 Q. And any other documents from this 21 litigation?</p> <p>22 A. Well, as I mentioned already, the 23 expert testimony that will be brought in from</p>	<p style="text-align: right;">Page 13</p> <p>1 summer to talk with his staff about the 2 congressman's hold on military promotions in 3 the senate.</p> <p>4 Q. What response did you get back from 5 his office?</p> <p>6 A. The response I got from that 7 particular staffer was that wasn't his 8 purview, but he would pass it on to the 9 congressman.</p> <p>10 Q. Anything else that you contacted 11 Representative Palmer about?</p> <p>12 A. Nothing comes to mind right now.</p> <p>13 Q. What about Representative Sewell?</p> <p>14 Had you ever contacted her?</p> <p>15 A. Well, that's an interesting 16 question. Several years ago I tried to 17 contact Representative Sewell, but I think 18 what happens is they see what zip code you're 19 in, and it's not a possibility if the zip 20 code doesn't match the district of the 21 congressperson. I have not contacted her 22 since I became a constituent of hers.</p> <p>23 Q. What about your state</p>

<p style="text-align: right;">Page 14</p> <p>1 representatives? Who is your state senator?</p> <p>2 A. Jabo Waggoner.</p> <p>3 Q. Have you ever reached out to him?</p> <p>4 A. I certainly have.</p> <p>5 Q. When was that?</p> <p>6 A. Oh, it's been on multiple occasions</p> <p>7 as various issues have come before the</p> <p>8 legislature. Perhaps the grocery tax,</p> <p>9 perhaps voting-related issues. And my state</p> <p>10 representative is David Faulkner, and I've</p> <p>11 also reached out to him.</p> <p>12 Q. You said "voting-related issues."</p> <p>13 What are you referring to there?</p> <p>14 A. Would you say that again?</p> <p>15 Q. Sure. You said earlier that you</p> <p>16 had reached out to Senator Waggoner about</p> <p>17 voting-related issues. What were you</p> <p>18 referring to by voting-related issues?</p> <p>19 A. Well, it was probably different</p> <p>20 issues that were coming before the</p> <p>21 legislature like Senate Bill 1, which would</p> <p>22 have had some impact on absentee voter</p> <p>23 applications and the organizations that help</p>	<p style="text-align: right;">Page 16</p> <p>1 That's an apartment complex.</p> <p>2 Q. What is the highest level of</p> <p>3 education that you've attained?</p> <p>4 A. I have a Master's in Public Affairs</p> <p>5 from the Lyndon B. Johnson School of Public</p> <p>6 Affairs, University of Texas, and a Master's</p> <p>7 level equivalent from the Army War College.</p> <p>8 Q. Where is the Army War College?</p> <p>9 A. Carlisle, Pennsylvania.</p> <p>10 Q. Where did you graduate college?</p> <p>11 A. I graduated undergraduate at</p> <p>12 Millsaps College in Jackson, Mississippi, and</p> <p>13 then my Master's from UT Austin.</p> <p>14 Q. What was your undergraduate degree?</p> <p>15 A. Political Science.</p> <p>16 Q. And did you graduate high school in</p> <p>17 West Point?</p> <p>18 A. I did, public school.</p> <p>19 Q. Are you married?</p> <p>20 A. No.</p> <p>21 Q. Do you have any children?</p> <p>22 A. No.</p> <p>23 Q. Are you currently employed?</p>
<p style="text-align: right;">Page 15</p> <p>1 in that respect. I would point out that in</p> <p>2 my reaching out to Senator Waggoner and</p> <p>3 Representative Faulkner, I have never gotten</p> <p>4 a response.</p> <p>5 Q. Where did you grow up?</p> <p>6 A. West Point, Mississippi.</p> <p>7 Q. Where is that roughly in</p> <p>8 Mississippi?</p> <p>9 A. It's in Northeast Mississippi near</p> <p>10 Starkville and Columbus.</p> <p>11 Q. Where else have you resided?</p> <p>12 A. I have resided in Arizona,</p> <p>13 Kentucky, South Carolina and Germany.</p> <p>14 Q. How long have you lived in Alabama?</p> <p>15 A. Since the early 1990s.</p> <p>16 Q. And has that always been in Hoover?</p> <p>17 A. No. I lived for several years in</p> <p>18 Tuscaloosa before relocating to Jefferson</p> <p>19 County. And I have lived in two different</p> <p>20 locations in Hoover.</p> <p>21 Q. What is the other location in</p> <p>22 Hoover that you lived at?</p> <p>23 A. 7213 Rime Village in Hoover.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. No.</p> <p>2 Q. Can you tell me about your past</p> <p>3 employment?</p> <p>4 A. Okay. After graduating from UT</p> <p>5 Austin, I spent two years as a legislative</p> <p>6 assistant to a senior member of the Texas</p> <p>7 House of Representatives. Then I got a</p> <p>8 direct commission into the United States</p> <p>9 Army, and I served on active duty for 14</p> <p>10 years, and then I transitioned to the army</p> <p>11 reserve, where I served for the remainder of</p> <p>12 my 34 years of duty, and it was part of a</p> <p>13 program called the Military Technician</p> <p>14 Program. So, while I was a reserve officer,</p> <p>15 I was also a federal civil servant. So,</p> <p>16 that's -- my career has been in military</p> <p>17 intelligence, personnel and human resources.</p> <p>18 Q. Who was the representative that you</p> <p>19 worked for when you were a legislative aide?</p> <p>20 A. I worked for Representative Nugent,</p> <p>21 who was senior and the chair of the House</p> <p>22 Transportation Committee.</p> <p>23 Q. What party did he represent?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. He represented the Democratic 2 Party, which in 1976 was the primary party in 3 Texas. 4 Q. Are you currently a member of any 5 professional organizations? 6 A. Could you define professional 7 organization? 8 Q. Well, let me ask, are you currently 9 a member of any civic organizations? 10 A. Yes. I'm a member of the League of 11 Women Voters. I'm a member of the American 12 Association of University Women. I'm a 13 member of a nonprofit called PEO that raises 14 money for women's scholarships, and I'm a 15 member of my United Methodist Church. 16 Q. So, my previous question about 17 professional organizations, are there any 18 other organizations that would fall within 19 that that you didn't just mention? 20 A. Well, I guess I'm also a member of 21 the Army War College Foundation. Excuse me. 22 One more. I'm a member of the Reserve 23 Officers Association as well.</p>	<p style="text-align: right;">Page 20</p> <p>1 active role in them. I do have a couple of 2 different roles in my local church, but 3 they're not really germane to this 4 discussion, I don't think. 5 Q. Okay. Do you have a title, a 6 leadership position in the League of Women 7 Voters currently? 8 A. I'm on the state board of the 9 League of Women Voters, and I have been 10 charged with trying to develop liaison 11 relationships with our organizations in 12 Tennessee and Mississippi. 13 Q. How long have you been a member of 14 the League of Women Voters? 15 A. Since 1976, with a couple of 16 hiatuses when I was stationed in Germany and 17 the Pentagon. 18 Q. Is the League of Women Voters only 19 open to women? 20 A. It is not only open to women. It 21 is open to men and to young people who are 16 22 and older. Great question. 23 Q. Is the League of Women Voters a</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. So, with the civic organizations 2 that you just referenced, I wasn't able to 3 write them all down, but could you talk about 4 your role in each of those? 5 A. Yes. I first would say that all of 6 those are nonpartisan. And so, in terms of 7 AAUW and PEO, those are really mostly to 8 share information and raise money for 9 scholarships. But the League of Women 10 Voters, as you may know, was founded in 1920 11 as a nonpartisan organization originally to 12 help women learn how to vote after the 13 passage of the 19th Amendment, but it is now 14 an organization that does advocacy after 15 study and takes positions on certain issues 16 for which we already have done a study and 17 have developed a position. We also do voter 18 outreach, voter education and encourage 19 informed voting. 20 Q. Did that cover all of the civic 21 organizations that you mentioned earlier? 22 A. I believe so. The other ones are 23 pretty much membership only. I don't have an</p>	<p style="text-align: right;">Page 21</p> <p>1 multiracial organization? 2 A. Yes, it is. 3 Q. Do African Americans have a say in 4 the League's decisions? 5 A. Well, yes. The League has made a 6 concerted effort to diversify the membership 7 in all different ways. The current president 8 of the League of Women Voters of Greater 9 Birmingham happens to be African American. 10 Our new CEO at the national level is African 11 American, and our previous president of the 12 League of Women Voters was African American. 13 Q. Are there any other civic 14 organizations that you used to be a member 15 of? 16 A. That I used to be a member of? 17 Q. Yes. 18 A. Well, the Sierra Club, the 19 Association of the United States Army. Those 20 are the two that come to mind. 21 Q. Okay. Do you have any social media 22 accounts? 23 A. Yes.</p>



<p style="text-align: right;">Page 22</p> <p>1 Q. What platforms do you have social 2 media accounts on? 3 A. I have an account on Facebook and 4 on X. 5 Q. What is your account name on 6 Facebook? 7 A. My name -- oh, sorry. It's 8 slay@slay, I think. On Facebook, it's my 9 name. On Twitter, it's the other. 10 Q. You said slay@slay? 11 A. I think there's a "Slay at" and 12 "underline Slay," but I would have to (audio 13 faded out). 14 Q. Okay. Have you posted about this 15 litigation on any of your social media 16 accounts? 17 A. No. 18 Q. Have you made any public statements 19 about this case? 20 A. Not that I recall. But you know, 21 that was a year ago. I don't recall making 22 any. 23 Q. What is your understanding of what</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. What is your understanding of what 2 this lawsuit is about? 3 A. The lawsuit seeks to underscore the 4 ramifications of redistricting with racial 5 gerrymandering as its goal. 6 Q. Can you explain what you mean when 7 you say "with racial gerrymandering as its 8 goal"? 9 A. Racial gerrymandering is a process 10 by which people of color are packed into a 11 district so that their votes are taken away, 12 and that the end result is that both 13 districts become uncompetitive, and there 14 aren't a chance for people to vote for people 15 who have a reasonable chance of winning with 16 a different perspective. 17 Q. How did you get involved in this 18 litigation? 19 A. I believe the attorneys for the 20 plaintiffs reached out to various 21 organizations, and I heard about that, and I 22 volunteered because I was a member -- I met 23 the criteria in that I was a constituent in</p>
<p style="text-align: right;">Page 23</p> <p>1 redistricting is? 2 A. Redistricting is constitutionally 3 mandated after a census if the population 4 deviations are such that they need to be -- 5 the district lines need to be equalized. 6 Q. When did you become interested in 7 redistricting? 8 A. Well, based on my academic back- 9 ground the implications of redistricting, 10 I've been interested in it for a long time. 11 Q. So, is it fair to say that you were 12 paying attention to redistricting in Alabama 13 before 2020? 14 A. I would think that would be a fair 15 statement. 16 Q. You said you moved to Alabama in 17 the '90s, right? 18 A. Right. 19 Q. So, the first redistricting cycle 20 that you would have paid attention to was 21 probably in 2000; is this right? 22 A. Yes. Well, after that census 23 probably, but yes.</p>	<p style="text-align: right;">Page 25</p> <p>1 District 6, and that was the key -- one of 2 the key points of this litigation. 3 Q. Do you know roughly when you got 4 involved with this litigation? 5 A. No. 6 Q. So, I believe the initial complaint 7 in this case was filed at the end of 8 September in 2021. Would it have been about 9 around there, late September of 2021? 10 A. I would -- yes, I would assume so 11 because I was part of the original plaintiffs 12 in the case. Yes. 13 Q. Do you know any of the other 14 plaintiffs in the Singleton case? 15 A. Do I -- I know of them now. But I 16 have no personal relationship with any of the 17 plaintiffs. In fact, I haven't met them in 18 person. 19 Q. Have you read the original 20 complaint that the Singleton plaintiffs filed 21 back in 2021? 22 A. Yes. 23 Q. When did you last read it?</p>

<p style="text-align: right;">Page 26</p> <p>1 A. Not recently.</p> <p>2 Q. So, maybe a couple of years ago?</p> <p>3 A. Probably, but I have read every</p> <p>4 pleading that we have filed.</p> <p>5 Q. So, (audio faded out) you've read</p> <p>6 the most recent complaint that the Singleton</p> <p>7 plaintiffs filed in 2024, which is the second</p> <p>8 amended complaint?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know when you last read</p> <p>11 that?</p> <p>12 A. Well, I believe I read it last week</p> <p>13 when the three-judge federal panel denied all</p> <p>14 of Alabama's suppositions in that suit. I</p> <p>15 believe there were eight.</p> <p>16 Q. What do you understand the legal</p> <p>17 claims to be in the most recent complaint?</p> <p>18 A. Well, I think the bottom line is</p> <p>19 that we're asking for one person, one vote so</p> <p>20 that votes have an equal chance of having an</p> <p>21 impact, and that there shouldn't be</p> <p>22 artificial ways to try to decrease the</p> <p>23 possibility of that.</p>	<p style="text-align: right;">Page 28</p> <p>1 testifying about your desire to keep</p> <p>2 Jefferson County whole?</p> <p>3 A. I do.</p> <p>4 Q. Do you recall testifying that you</p> <p>5 thought the 2023 map that the legislature</p> <p>6 passed was a racial gerrymander because of</p> <p>7 what you described as a finger going into</p> <p>8 Jefferson County that extracted primarily</p> <p>9 minority neighborhoods into Congressional</p> <p>10 District 7?</p> <p>11 A. I do recall that testimony, and I'm</p> <p>12 not the only one that called it a finger into</p> <p>13 Jefferson County. That's the common name for</p> <p>14 that effort.</p> <p>15 Q. Are you aware that to draw a</p> <p>16 congressional districting map in Alabama that</p> <p>17 complies with Section 2 of the Voting Rights</p> <p>18 Act that you have to split Jefferson County?</p> <p>19 A. You do not have to split Jefferson</p> <p>20 County. You can -- you can make Jefferson</p> <p>21 County whole, add a few precincts in Northern</p> <p>22 Shelby County and meet all of the criteria of</p> <p>23 the Voting Rights Act and the Constitution.</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Do you know what a claim under</p> <p>2 Section 2 of the Voting Rights Act is?</p> <p>3 A. In general terms, yes. I'm not a</p> <p>4 lawyer. But that is -- that is the claim for</p> <p>5 which you cannot deny people the right to</p> <p>6 vote on an equal basis with other citizens.</p> <p>7 Q. Are you aware that a Section 2 of</p> <p>8 the Voting Rights Act claim was added to with</p> <p>9 the second amended complaint?</p> <p>10 A. Yes.</p> <p>11 Q. Do you understand what the</p> <p>12 difference is between a racial gerrymandering</p> <p>13 claim and a Section 2 of the Voting Rights</p> <p>14 Act claim?</p> <p>15 A. Well, I would have to defer that</p> <p>16 question. I'm not a lawyer. Can you tell me</p> <p>17 why this is germane?</p> <p>18 Q. Yes. Well, we'll get to that. So,</p> <p>19 we talked about that you testified in a</p> <p>20 deposition back in August of last year,</p> <p>21 correct?</p> <p>22 A. Correct.</p> <p>23 Q. In that deposition, do you recall</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. I want you to assume that I'm</p> <p>2 correct about that, that you do have to split</p> <p>3 Jefferson County --</p> <p>4 MR. BLACKSHER: Object to form and</p> <p>5 to the predicate of that question.</p> <p>6 Q. (By Mr. Seiss) Would you support</p> <p>7 any map that splits Jefferson County?</p> <p>8 A. My ideal solution would be to keep</p> <p>9 Jefferson County whole. If the courts agreed</p> <p>10 that a map that was presented met the</p> <p>11 requirements of the Voting Rights Act and</p> <p>12 gave citizens in another district a possi-</p> <p>13 bility of forming a coalition and are finding</p> <p>14 candidates of their choice, yes. But</p> <p>15 ideally, in my position, I want Jefferson</p> <p>16 County to be kept whole for a number of</p> <p>17 reasons.</p> <p>18 Q. Can you talk about those reasons?</p> <p>19 A. Sure. Because one of the goals of</p> <p>20 redistricting, when possible, is to keep</p> <p>21 political boundaries whole. It also has a</p> <p>22 number of other criteria from the Gingles</p> <p>23 case that you have to meet some criteria such</p>



<p style="text-align: right;">Page 30</p> <p>1 as, you know, congruence, trying not to have  2 incumbents face each other. There are a  3 number of criteria, and Jefferson County can  4 meet most of those. Certainly we have the  5 population with the addition of a few  6 precincts in Shelby County. We've got the  7 political cohesiveness. We've got common  8 issues in the county that are artificially  9 split when you make two congressional  10 districts out of this one county. We've got  11 common objectives to make this county  12 better. And yet we get split between two  13 congress people who have very different other  14 constituencies they need to satisfy.  15 Q. What do you want the court to do in  16 this lawsuit?  17 A. We would like the court to  18 recognize the ways in which the Alabama  19 legislature and government has sought to  20 racially gerrymander the state, and also  21 through other mechanisms to try to chill  22 voting turnout, voter participation and the  23 efforts of voting rights organizations to get</p>	<p style="text-align: right;">Page 32</p> <p>1 both parties in a hard fought primary with  2 viable ideas because it's possible for people  3 from either party to win. You look at other  4 districts, and the same person is put up with  5 a nonviable candidate from the other party  6 with foregone conclusions.  7 Q. Is that true of current  8 Congressional District 7?  9 A. I think you would say that's true  10 for 7. It's true for 6. The incumbent did  11 have some primary opposition in Congressional  12 District 6, but it was nothing that really  13 rose to the level of a viable challenge, and  14 he certainly coasted to victory in the  15 general election.  16 Q. You referred to laws that -- I  17 don't know the exact word, but further chill  18 voting. What laws are you referring to?  19 A. Well, there's two specific laws  20 that were passed by the 2024 legislature and  21 have been signed by the governor. One was  22 SB1, which impacted how civic organizations  23 can help prospective voters with voting</p>
<p style="text-align: right;">Page 31</p> <p>1 people registered to vote. That's what I'd  2 like to see happen.  3 Q. What does a map that addresses  4 those concerns look like?  5 A. A map doesn't address all of those  6 concerns because some of this has happened in  7 the 2024 legislature when -- through laws  8 that have further chilled voting. But a map  9 that would show the ability of people from  10 different perspectives to be able to vote for  11 two viable -- or more viable candidates would  12 be a step in the right direction. And I'm  13 talking about democracy with a little "d".  14 There's no party here.  15 Q. So, are you saying that you want  16 competitive congressional districts?  17 A. Yes.  18 Q. What is a competitive congressional  19 district?  20 A. Well, I think you can look at the  21 results of what's happening in the newly  22 created Congressional District 2. You see a  23 plethora of candidates coming forward from</p>	<p style="text-align: right;">Page 33</p> <p>1 applications. Not the ballot, but the  2 application. And the alleged reason for that  3 was because of, quote, "ballot harvesting."  4 But you're not even involving ballots because  5 you're just asking for an absentee voter  6 application. Because of that law and the  7 ambiguity of some of the words like "gift"  8 and "payment," both the NAACP and the League  9 of Women Voters have suspended all efforts to  10 help voters with their absentee voter  11 applications, not their ballots. That is  12 definitely chilling civic engagement and  13 involvement in the political process. The  14 other is House Bill 100, which refined and  15 updated the felony law from 2017, and I would  16 like to go into that a little bit because of  17 its ramifications. In 2017, the legislature  18 did a really good thing, and they codified  19 what was a crime of moral turpitude so it was  20 standard throughout the state of Alabama.  21 Before that time, every county had kind of  22 decided on their own what was a crime of  23 moral turpitude. There were about 40-ish</p>

<p style="text-align: right;">Page 34</p> <p>1 crimes that denied you the right to vote if  2 you had been convicted, not accused, but  3 convicted of that crime. The 2024  4 legislature decides they're going to expand  5 that. They have added other crimes to it.  6 You don't even have to be convicted of the  7 crime. You can be accused and convicted of  8 solicitation or conspiracy, and that's the  9 same as the crime itself. So, you have got  10 now more felonies for which you can lose the  11 right to vote. That includes some felonies  12 that were originally allowed -- we were  13 allowed to make sure that people could vote.  14 This is going to disproportionately affect  15 certain segments of the population. Some of  16 the crimes that were added were -- could be  17 inferred to be aimed at certain demographics.  18 For example, solicitation to join a gang,  19 that is -- tends to be more one demographic  20 than the other. The more felonies that you  21 exclude from the privilege, the citizen's  22 right to vote, the more it affects felons who  23 fall under those new felonies. And let me</p>	<p style="text-align: right;">Page 36</p> <p>1 you need to be involved, and if you see  2 something that's potentially a violation of  3 the Constitution or a federal law, that you  4 should be aware of it and bring it to the  5 attention of legislators. My legislator had  6 actions that led to that redistricting map.  7 Q. If Alabama can draw a congressional  8 district that is majority black voting age  9 population, do you believe that it should do  10 so?  11 A. I believe what our lawsuit attempts  12 to do is to draw a couple of opportunity  13 districts, not guaranteed, but opportunities  14 for people to hear more moderate voices, more  15 viable voices to form coalitions if that  16 happens and be able to realistically hope  17 that a candidate of your choosing might win  18 the election. Not will win the election, but  19 has a viable chance to win the election  20 because of the way the district has been  21 drawn.  22 Q. Is it fair to say that you followed  23 the legislative proceedings regarding</p>
<p style="text-align: right;">Page 35</p> <p>1 just give you a statistic. Right now,  2 African Americans constitute 27 percent --  3 26.7 percent of the population of Alabama,  4 but they are incarcerated in state prisons at  5 52.7 percent. So, therefore, the more  6 felonies that you exclude from voting is  7 going to disproportionately affect that  8 racial group. That's an example of not just  9 redistricting, but another effort to chill  10 the vote based on race.  11 Q. Do you know if Democrats supported  12 HB100?  13 A. Since this is not about parties, I  14 don't know what the end result of that was.  15 I'm not looking at Republican and Democrat.  16 I'm looking at the holistic effect of the  17 legislation. But I'm sure you could look it  18 up.  19 Q. Do you need to live in one of the  20 newly formed competitive congressional  21 districts to address your concerns about the  22 2023 map that the legislature passed?  23 A. Do I -- no. As a citizen, I think</p>	<p style="text-align: right;">Page 37</p> <p>1 redistricting this cycle?  2 A. The League of Alabama has an  3 advocacy committee, and what they do is  4 follow bills of interest for our organiza-  5 tion. And I am not on that advocacy  6 committee because they have to read a lot of  7 different bills, but membership is informed  8 when an important vote might be coming up  9 that you can or should weigh in on after  10 reading the background that has come to our  11 attention from the advocacy committee. So,  12 I'm not following every bill and not even  13 every bill that affects us, the League of  14 Women Voters, and I am not speaking for the  15 League. I want to underscore that here. But  16 I'm certainly informed when things like  17 Senate Bill 1 come out and House Bill 100 and  18 leaders who are authorized to speak went to  19 Montgomery and spoke against those bills.  20 Q. So, you didn't speak personally at  21 --  22 A. No. Only the president can speak  23 for the League.</p>

<p style="text-align: right;">Page 38</p> <p>1 Q. Did you review any of the maps that</p> <p>2 were submitted during the redistricting cycle</p> <p>3 in the legislature?</p> <p>4 A. I followed some of that, of course,</p> <p>5 in the public media, and actually one of the</p> <p>6 maps that was submitted early on was -- the</p> <p>7 research on some of that was done by league</p> <p>8 members in North Alabama. But yes, I've seen</p> <p>9 various maps that were submitted by various</p> <p>10 members of the legislature in general, but</p> <p>11 that was now a couple of years ago.</p> <p>12 Q. When you said that the League in</p> <p>13 North Alabama did the research for one of the</p> <p>14 maps, what do you mean by that?</p> <p>15 A. Well, they had done some data</p> <p>16 crunching to show how changing lines in very</p> <p>17 small ways could have provided more</p> <p>18 opportunities. And again, this was not for</p> <p>19 the congressional. This was more just for</p> <p>20 state level house and senate races.</p> <p>21 Q. Do you know if the League endorsed</p> <p>22 a congressional redistricting maps?</p> <p>23 A. The League did not endorse any</p>	<p style="text-align: right;">Page 40</p> <p>1 to take it out of your hands and do it</p> <p>2 ourselves." And they had a special master</p> <p>3 that presented three different possible</p> <p>4 redistrictings, and the court chose the one</p> <p>5 that ended up in the new Congressional</p> <p>6 District 2.</p> <p>7</p> <p>8 (Defendant's Exhibit No. 1 identified.)</p> <p>9</p> <p>10 MR. SEISS: I'd like to share on my</p> <p>11 screen what we'll mark as Exhibit 1. Can you</p> <p>12 all see that?</p> <p>13 THE WITNESS: Yes.</p> <p>14 Q. (By Mr. Seiss) Now, what's</p> <p>15 currently on the screen, if you see at the</p> <p>16 bottom, it says Act 2021-555 Map. That is</p> <p>17 the 2021 map that the legislature (audio</p> <p>18 faded out). What do you think of this map?</p> <p>19 A. Well, I'm more concerned with</p> <p>20 Jefferson County, and it continues to split</p> <p>21 Jefferson County and take out heavily</p> <p>22 minority sections of Jefferson County and</p> <p>23 include them in Congressional District 7 so</p>
<p style="text-align: right;">Page 39</p> <p>1 maps.</p> <p>2 Q. Did you submit any documents to the</p> <p>3 legislature during the redistricting</p> <p>4 hearings?</p> <p>5 A. Did I? No.</p> <p>6 Q. Have you seen the 2021 map that the</p> <p>7 legislature passed?</p> <p>8 A. I'm sure I have. The one that was</p> <p>9 overruled by the Supreme Court, is that the</p> <p>10 one you're referring to?</p> <p>11 Q. More or less, yes. What do you</p> <p>12 think of that map?</p> <p>13 A. I believe the Court said that the</p> <p>14 legislature didn't follow the previous</p> <p>15 guidance from the Supreme Court. But am I</p> <p>16 correct in that? They said that it had to be</p> <p>17 redrawn, and that's where the court had to</p> <p>18 bring in a special master?</p> <p>19 Q. And you agree with what the court</p> <p>20 found?</p> <p>21 A. Well, I think the court was fairly</p> <p>22 straightforward in sayig, "We told you to do</p> <p>23 this. You didn't do this. So, now we've got</p>	<p style="text-align: right;">Page 41</p> <p>1 that the Congressional District 6 seems to be</p> <p>2 a really safe district and heavily white.</p> <p>3 So, I did not like that map.</p> <p>4 Q. What district do you live in under</p> <p>5 this map?</p> <p>6 A. If that's -- in that map, I</p> <p>7 continue to live in Congressional District 6.</p> <p>8 Only with the redrawn map, most recently</p> <p>9 redrawn map, by a couple of streets am I now</p> <p>10 in Congressional District 7, which under-</p> <p>11 scores the implausibility of doing this when</p> <p>12 you're literally splitting a neighborhood</p> <p>13 between two congressional districts, and you</p> <p>14 don't have to.</p> <p>15 Q. Do you have an opinion about what</p> <p>16 role, if any, that race played in the drawing</p> <p>17 of this map?</p> <p>18 A. I think race played a role that was</p> <p>19 never recognized or acknowledged, but you are</p> <p>20 very clear to see what the turnout by race is</p> <p>21 in various precincts in Jefferson County, and</p> <p>22 you can also see the possibilities over past</p> <p>23 elections that it would be really possible to</p>

<p style="text-align: right;">Page 42</p> <p>1 form a coalition in Jefferson County to elect  2 a more moderate candidate of whatever party.  3 And the way that those neighborhoods were  4 pulled out clearly showed that there was  5 knowledge of the demographic makeup of those  6 neighborhoods. If you're just trying to  7 equalize population, you could have done it  8 in other ways and not pull those particular  9 neighborhoods out.</p> <p>10 Q. Do you have any direct evidence  11 that race was considered in the drawing of  12 this map?</p> <p>13 A. No.</p> <p>14 Q. Do you have an opinion about what  15 role, if any, that partisan politics played  16 in the drawing of this map?</p> <p>17 A. Well, because one of the criteria  18 is always to try not to put incumbents  19 against each other, I'm sure that was one of  20 the objectives is so that people of the same  21 party didn't have to face each other in a  22 congressional district. But that's not the  23 overwhelming reason to try to draw a</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. And did you live in Congressional  2 District 6 under this map?</p> <p>3 A. Yes.</p> <p>4 MR. SEISS: Would now be a good  5 time to take about a 10-minute break?</p> <p>6 THE WITNESS: Yes.</p> <p>7 MR. SEISS: Okay. Let's do that  8 and come back at 10:05.</p> <p>9 (Break was taken.)</p> <p>10 Q. (By Mr. Seiss) I'd like to follow  11 up on a few things that we talked about  12 earlier. You mentioned contacting  13 Representative Sewell earlier. When did you  14 try to contact her?</p> <p>15 A. Oh, this was years and years ago,  16 not recently at all. And I knew that I was  17 not in her district. And actually, it was to  18 compliment her on an initiative she had done  19 in the Congress. But my memory is that my  20 email didn't go through, and I only surmise  21 it was because they had some sort of filter  22 based on your address.</p> <p>23 Q. Do you remember what that</p>
<p style="text-align: right;">Page 43</p> <p>1 district. That's just a criteria. But  2 that's my thought on that.</p> <p>3 Q. I'm going to scroll to the next  4 page. You'll see at the top it says,  5 "Livingston Congressional Plan 3 2023," and  6 I'll represent to you that this is the 2023  7 plan that the legislature adopted. What do  8 you think of this plan?</p> <p>9 A. Well, I think one of the reasons  10 this plan, the 2023 plan adopted by the  11 legislature did not pass judicial review is  12 because it attempts to do the same thing,  13 which was to keep only one district an  14 opportunity district for African Americans  15 and to pretty much keep the map as it was  16 before with some tweaks. And that's the --  17 in my understanding, that's the one the court  18 said, "This will not go."</p> <p>19 Q. What do you think about the split  20 in Jefferson County?</p> <p>21 A. I wish that Jefferson County could  22 remain whole. It continues to split  23 Jefferson County and in the same ways.</p>	<p style="text-align: right;">Page 45</p> <p>1 initiative was?</p> <p>2 A. Do I remember what it was about, or  3 when?</p> <p>4 Q. Yes, what the initiative that you  5 were complimenting her on was about?</p> <p>6 A. I do not.</p> <p>7 Q. You also talked about reaching out  8 to Senator Waggoner and Representative  9 Faulkner. When was that?</p> <p>10 A. Well, I suspect that it was as late  11 as this legislative session because if I'm  12 not mistaken, Senator Waggoner was one of the  13 sponsors of the bills that I opposed.</p> <p>14 Q. Are you talking about SB1 and  15 HB100?</p> <p>16 A. Yes. And one of those two bills,  17 he's listed as the senate sponsor on.</p> <p>18 Q. How did you try to contact Senator  19 Waggoner?</p> <p>20 A. Email.</p> <p>21 Q. And is that the same for  22 Representative Faulkner?</p> <p>23 A. Yes, although I have used their</p>



<p style="text-align: right;">Page 46</p> <p>1 phone before. I've used Senator Waggoner's  2 phone answering service. It usually has a  3 staffer that answers, and you can just leave  4 a short message about why you're calling.  5 Q. Did you get in contact with anyone  6 from his staff?  7 A. No. What generally happens is you  8 call and you -- it's something that's right  9 before the legislature, and you tell them who  10 you are and where you live and whether you  11 are for it or against it, and they say,  12 "Thank you very much. I'll relay this to  13 the senator." So, I have had no direct  14 conversations with Senator Waggoner.  15 Q. You mentioned earlier that the  16 principle of one person, one vote. What does  17 that mean to you?  18 A. That means that the citizen should  19 have the ability to cast a vote that's equal  20 to other votes. And when your vote is  21 diluted by the way that the districts are  22 drawn, then your vote doesn't have the same  23 strength as another person's vote does.</p>	<p style="text-align: right;">Page 48</p> <p>1 district was or was not in compliance. But  2 I'm going to have to defer to the legal team  3 to give the specifics.  4 Q. What do you think the goals of  5 redistricting are?  6 A. What they are or what they should  7 be?  8 Q. Let's start with what they are.  9 A. The goals of redistricting, I  10 think, would vary based on the legislators  11 who are charged with doing the redistricting.  12 And it depends on what their overt goals are  13 and their covert goals are. But the goal  14 would be always, in my opinion, to keep  15 incumbents from running against each other.  16 That would be one. One is to satisfy the  17 technical requirements of judicial decisions  18 in Section 2 of the Voting Rights Act. And  19 then the others are let's see what we can get  20 away with. And again, I think that's very  21 state specific.  22 Q. And then you said earlier what you  23 think (audio faded out) should be the goals</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Are you talking about more than  2 just in terms of equal population between  3 congressional districts?  4 A. Yes.  5 Q. Do you know what the 2020 census  6 showed as to the populations of the existing  7 congressional districts?  8 A. No.  9 Q. So, you don't know which districts  10 were over- or underpopulated?  11 A. No.  12 Q. You mentioned earlier redistricting  13 requirements that come from a case called  14 Gingles. What do you understand those  15 requirements to be?  16 A. Well, it's been a while since I  17 read that, and so, I'm going to just say that  18 my memory is there were four or five specific  19 criteria that the court laid out in that case  20 that were objectives of redistricting. And  21 so, it's not that you just have to prove one  22 thing; it was a fairly high bar that you had  23 to absorb multiple criteria to show whether a</p>	<p style="text-align: right;">Page 49</p> <p>1 of redistricting, didn't you?  2 A. The goals of redistricting should  3 be to try to keep political subdivisions as  4 whole as possible, and yet do justice by the  5 criteria that the court and the law has set  6 out. The goal would be to try to equalize  7 voting by various constituencies so that  8 people have a fair chance to have their  9 opinions carried at the ballot box. Not that  10 they're going to win every time, but they  11 would have a reasonable chance that the  12 candidate of their choice would prevail  13 sometimes. And the downside of not doing  14 that is people get despondent, they give up,  15 and they don't vote.  16 Q. Do you think competitive elections  17 is the number one priority for redistricting?  18 A. I think it's a high priority for  19 redistricting, very high, because it elicits  20 interest, it elicits more viable candidates  21 and fundraising for them because you think  22 you might have a chance of prevailing. It  23 also -- research has shown it brings people</p>

<p style="text-align: right;">Page 50</p> <p>1 to the middle because if you have to reach a  2 broader swath of the constituency, you cannot  3 afford to have extreme views on a number of  4 issues. So, the result might be in a  5 competitive district, number one, that you  6 have viable candidates from parties that  7 choose to compete or third-party candidates;  8 number two, they raise more money because  9 they are viable candidates, and it's an  10 opportunity district; number three, voters  11 are excited because their vote might actually  12 prevail in this election, and then you find  13 that there's more turnout in the election.  14 Q. The benefits of competitive  15 elections that you just referenced, do you  16 see that playing out in countywide elections  17 in Jefferson County?  18 A. I do not. And I'll say one reason  19 for that might be the straight party voting  20 that is permitted in Alabama, which only a  21 handful of states permit, only seven. Most  22 states have done away with it since about  23 2006, except Nevada, and they've added it in</p>	<p style="text-align: right;">Page 52</p> <p>1 candidates.  2 Q. Is it fair to say that you'd have  3 to add more Republicans to a congressional  4 district, including all of Jefferson County,  5 to make it more competitive?  6 A. Would you say that again, please?  7 Q. So, I think you talked about  8 earlier how your goal was to keep Jefferson  9 County whole --  10 A. Right.  11 Q. -- as a congressional district.  12 And so, my question is: To make a district  13 containing all of Jefferson County more  14 competitive, would you have to add  15 Republicans?  16 A. Add Republicans? Jefferson County  17 already has a considerable percentage of  18 people who vote Republican. You can see that  19 in election results in the over-the-mountain  20 communities. So, what keeping Jefferson  21 County whole might do is to allow candidates  22 that appeal to the specific interests of  23 Jefferson County in a more moderate way with</p>
<p style="text-align: right;">Page 51</p> <p>1 the last couple of years. But what happens  2 is people will vote a straight ticket as  3 opposed to giving the thought for public  4 service that these candidates have offered  5 themselves from both parties. That, in my  6 opinion, hurts judicial candidates in  7 Jefferson County, and it hurts other  8 candidates in heavily Republican counties in  9 Alabama. Straight ticket voting is not  10 helpful to democracy in my opinion.  11 Q. Is it fair to say that the Democrat  12 usually wins a countywide election in  13 Jefferson County?  14 A. I think that's fair to say,  15 particularly if it's county elections. But  16 if you look at some of the statewide  17 elections for Jefferson County, it's fairly  18 competitive in terms of the percentages. It  19 might be 50/40, 55/45, but it's not a  20 complete wrap for statewide candidates in  21 Jefferson County. Countywide races are a  22 different story because until recently, one  23 party has maybe not even chosen to field any</p>	<p style="text-align: right;">Page 53</p> <p>1 specific policy positions and not just a "D"  2 or an "R" next to their name to come and  3 actually participate in the process. What is  4 happening when you have a foregone conclusion  5 is the incumbent will not answer a candidate  6 questionnaire. He or she will not debate,  7 will not answer detailed questions because  8 they don't need to. That is not helpful for  9 informed voting and an informed citizenry,  10 and it's not helpful for democracy.  11 Q. When you're referring to a  12 candidate questionnaire, are you referring to  13 the League of Women Voters candidate  14 questionnaire (audio faded out)?  15 A. The League of Women Voters  16 nationally has a system called Vote411.org,  17 which we would pay to participate in. You  18 can go to that site, you can enter your  19 address and enter which races you're  20 interested in or get your whole ballot. And  21 we have asked candidates who have applied for  22 those offices to fill out questionnaires that  23 are tailored to that particular race. All</p>



<p style="text-align: right;">Page 54</p> <p>1 the candidates for a particular race get the 2 same questions. We get their results 3 unedited, and we put exactly what they answer 4 on our website. But what is happening is the 5 people who are running for an office will 6 give you long, thoughtful, detailed answers. 7 The incumbent will choose never to reply. 8 So, what we do is we put the answer from the 9 incumbent saying, "No answer received," and 10 then you put the policy position from the 11 candidates, and it's not helpful. We try to 12 do candidate debates, and candidates will not 13 agree to debate. 14 Q. Are you seeing that across 15 incumbents in both parties? 16 A. Am I seeing it in both parties? 17 Well, our experience is mostly in Alabama, 18 and since one party has really dominated for 19 the last couple of decades, it's -- the 20 gubernatorial race, for example, we could not 21 get the incumbents to agree to a debate. 22 Q. In this Vote411, what is the lowest 23 level of political geography that you all are</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. So, what is the basis of your 2 testimony that a certain election would be 3 competitive? 4 A. I think, as I mentioned in my 5 previous deposition, that sometimes context 6 makes a lot of difference, and issues can 7 come up in a particular race that might 8 normally be a sleeper, but because of things 9 coming together at election season, that it 10 gets a lot more interesting. And if you have 11 those issues, if you have candidates that 12 speak to the issues, and importantly, if you 13 have reasonable district lines, you can find 14 a very competitive race. One example might 15 be in the last election cycle, the Public 16 Service Commission, which is normally sort of 17 a sleeper race for most people, got to be 18 pretty interesting because -- for a couple of 19 reasons. One was that power rates were going 20 up at the same time the election was going 21 on, and the person who was on the ballot who 22 is the chair of the commission refused to 23 debate. And so, there were lots of issues</p>
<p style="text-align: right;">Page 55</p> <p>1 doing questionnaires for? 2 A. City council, mayors, all the way 3 up to the president. 4 Q. So, for incumbent Democrats in 5 Jefferson County, are you seeing 6 participation in this questionnaire? 7 A. Yeah, more so. We had a couple 8 that were countywide officers. They didn't 9 answer. I'll mention that. And I don't 10 know. Sometimes it might get lost among the 11 staff. But we do follow up from people who 12 do not respond by the deadline. We try to 13 bend over backwards to make sure that voters 14 get the full spectrum. And of course, no 15 surprise, this will be a full-court press 16 this fall for general elections. 17 Q. You talked a bit about the kind of 18 competitiveness of certain elections in 19 Jefferson County. Have you conducted any 20 performance analyses yourself? 21 A. No. 22 Q. Do you know if the League has? 23 A. I don't know that. No.</p>	<p style="text-align: right;">Page 57</p> <p>1 that -- if you look at Jefferson County's 2 results, even though that person was a twice 3 incumbent, she had a fairly tough race in 4 Jefferson County. So, to make my point, it's 5 not across the board, but individual 6 elections context, perfect storms come 7 together. So, you can get viable races even 8 though on the surface it shouldn't be. 9 Q. I'd like to go back to Exhibit 1 10 that I was showing you earlier. Can you see 11 this map that is on the screen? 12 A. Yes. 13 Q. I'll represent to you that this is 14 the map that the three-judge court adopted 15 for the 2024 elections. What do you think of 16 this map? 17 A. I have no point of view on a map 18 that a judicial panel has already said meets 19 constitutional and legal thresholds. You 20 know, if it doesn't keep Jefferson County 21 whole, that's not ideal, but you don't always 22 get the ideal. 23 Q. Do you know if this map pairs any</p>

<p style="text-align: right;">Page 58</p> <p>1 incumbents?</p> <p>2 A. It did pair incumbents in the new</p> <p>3 District 2. As I understand it, it paired</p> <p>4 two GOP congressmen against each other</p> <p>5 initially.</p> <p>6 Q. And are you okay with a map that</p> <p>7 pairs two congressional incumbents?</p> <p>8 A. Well, I think it is not the</p> <p>9 ultimate goal of redistricting. It would be</p> <p>10 helpful not to do that. But apparently the</p> <p>11 court said that would be acceptable, or we</p> <p>12 wouldn't have this map.</p> <p>13 Q. Do you have an opinion about what</p> <p>14 role, if any, that race played in the drawing</p> <p>15 of this map?</p> <p>16 A. Well, the role that race played was</p> <p>17 that the map had to meet the Court's language</p> <p>18 that it had to be black majority or something</p> <p>19 close to black majority, if I can recall the</p> <p>20 language. This is not -- I think this dis-</p> <p>21 trict is maybe 40-ish percent. So, it's not</p> <p>22 as close as many people would have thought,</p> <p>23 but it apparently passed judicial review.</p>	<p style="text-align: right;">Page 60</p> <p>1 what candidate the GOP has fielded, and you</p> <p>2 have an incumbent who has been there a number</p> <p>3 of terms in Congress. So, it would more</p> <p>4 likely than not be as competitive as it could</p> <p>5 be if the lines were drawn differently.</p> <p>6 Q. And would you prefer District 7 to</p> <p>7 be more competitive?</p> <p>8 A. I would prefer every congressional</p> <p>9 district to be more competitive. This is not</p> <p>10 about making sure that one party or one other</p> <p>11 party prevails. It is allowing opportunities</p> <p>12 for people to have candidates of their choice</p> <p>13 to prevail in an election, and that might</p> <p>14 mean joining a coalition of like-minded</p> <p>15 voters.</p> <p>16 Q. Okay. I'm going to pull these maps</p> <p>17 now. Ms. Slay, are you registered to vote?</p> <p>18 A. I am.</p> <p>19 Q. Why did you register to vote?</p> <p>20 A. I grew up talking local politics.</p> <p>21 When I was 18 and eligible to vote, my father</p> <p>22 was on the ballot as a sheriff in Clay</p> <p>23 County, Mississippi. We are very much a</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Do you have an opinion about what</p> <p>2 something quite close to 50 percent means?</p> <p>3 A. I think it's just one way of</p> <p>4 assuring people that they have one person,</p> <p>5 one vote and that district lines aren't</p> <p>6 artificially drawn to pack and crack African</p> <p>7 Americans.</p> <p>8 Q. Do you know if Congressional</p> <p>9 District 7 is competitive in this map?</p> <p>10 A. I know where Congressional District</p> <p>11 7 is? Is that what you're saying?</p> <p>12 MR. BLACKSHER: Excuse me. I don't</p> <p>13 mean to interrupt. I just can't understand</p> <p>14 the question. If you could slow down again,</p> <p>15 please, Mr. Seiss? Thank you.</p> <p>16 MR. SEISS: Sure.</p> <p>17 Q. (By Mr. Seiss) So, Congressional</p> <p>18 District 7 is this light blue district, and</p> <p>19 I'm asking if you know if Congressional</p> <p>20 District 7 is competitive between the</p> <p>21 Democrat and Republican parties?</p> <p>22 A. I would say superficially the</p> <p>23 answer might be no, but I'm not familiar with</p>	<p style="text-align: right;">Page 61</p> <p>1 family of retail politics, read papers,</p> <p>2 obviously majored in political science,</p> <p>3 understand the importance of citizen par-</p> <p>4 ticipation, grass roots democracy. It's an</p> <p>5 obligation and a privilege of citizenship.</p> <p>6 Q. Did you register to vote when you</p> <p>7 turned 18?</p> <p>8 A. Yes. Otherwise, I couldn't have</p> <p>9 voted.</p> <p>10 Q. How did you first register to vote?</p> <p>11 A. I registered to vote in person in</p> <p>12 West Point, Mississippi.</p> <p>13 Q. What about when you subsequently</p> <p>14 registered to vote when you moved to</p> <p>15 different states?</p> <p>16 A. Probably up until Motor Voter, I</p> <p>17 registered -- had to go to the registrar's</p> <p>18 office. When I most recently registered to</p> <p>19 vote, it was returning from assignment in</p> <p>20 South Carolina and got a new driver's</p> <p>21 license. Then I was eligible to vote -- to</p> <p>22 register to vote because of the Help America</p> <p>23 Vote Act, which was not instituted when I</p>

<p style="text-align: right;">Page 62</p> <p>1 first started voting. You had to physically 2 go and sign up to register at a registrar's 3 office. 4 Q. Have you ever had any problems 5 registering to vote? 6 A. No. 7 Q. Have you ever helped someone else 8 register to vote? 9 A. I have helped people fill out voter 10 registration forms to register for the first 11 time or to change their mailing address or 12 their name. This is what the League of Women 13 Voters does. 14 Q. In your civic work, do you 15 encounter a lot of people who are not 16 registered to vote? 17 A. I encounter people who are not 18 registered because they are recently eligible 19 to vote. I've encountered people who feel 20 like it's no point in voting. I've 21 encountered people who have voted since they 22 were 18 and they're now 80. So, you have a 23 whole spectrum of people.</p>	<p style="text-align: right;">Page 64</p> <p>1 they are reluctant to register to vote 2 because they think they're not informed 3 enough to cast a ballot and therefore, they 4 choose not to register at all. But there are 5 many reasons. On the other hand, for people 6 who have been incarcerated, understanding 7 that they can vote is an epiphany and a big 8 gift because they now feel like they are 9 totally reintegrated into society because 10 they now have the right to vote like other 11 citizens do. And there are many people who, 12 because of laws, find that they cannot vote, 13 and yet they're paying taxes and doing other 14 parts of being a good citizen after having 15 paid their debt to society. 16 Q. In your work with people with 17 felony convictions, have you helped someone 18 obtain a Certificate of Eligibility to 19 Register to Vote or CERV? 20 A. I am not directly involved in VRR. 21 We have a subcommittee that's doing that. And 22 I actually got some statistics on that this 23 week, and for Jefferson County they have</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Do you have a rough percentage of 2 the people that you encounter in your civic 3 work that are not registered to vote? 4 A. I don't have that. It wouldn't be 5 reliable anyway because I'm just one person. 6 I don't do this every day. We register 7 throughout the year, but obviously some 8 seasons are more hectic than others. We also 9 do voter restoration work, and what we have 10 found is that many people think that they are 11 disenfranchised because of a felony 12 conviction, and in fact, they are not. 13 Q. You talked about people who 14 expressed the view that there is no point in 15 voting. Do you know what they meant by that? 16 A. I think people who are -- who have 17 had various intersections with the government 18 do not think that their voice will matter or 19 that their vote will be important enough. 20 And one of those subcommunities are unhoused 21 people with whom I have had some inter- 22 actions, and many of them don't think it 23 matters that they vote. And interestingly,</p>	<p style="text-align: right;">Page 65</p> <p>1 helped between 250 and 300 felons secure the 2 right to vote, and of those, 70 percent are 3 African Americans. Some of these don't 4 require CERV. Many of them don't. And yes, 5 this committee is informed. They are -- have 6 access to Alacourt, and they are doing this 7 work every day. 8 Q. Do you know if this subcommittee 9 seeks pardons as well? 10 A. Well, as you know, that's a very 11 laborious process, but they can help someone 12 navigate the process. One of the ambiguities 13 about the law that was just passed expanding 14 felonies regarding moral turpitude that the 15 League, NAACP and others have asked about, is 16 this retroactive, are people that feel like 17 they can vote because they were assured they 18 can, is that franchise now going to be taken 19 away from them. We're awaiting some guidance 20 from the Secretary of State on this. 21 Q. In your work in helping people 22 register to vote, are you aware of any 23 problems that people have had?</p>

<p style="text-align: right;">Page 66</p> <p>1 A. The form that is used to register  2 to vote in Alabama is a little tricky, and  3 so, there are some tiny little boxes that  4 need to be checked. And if they're not  5 checked, the registrar will reject your  6 ballot, and so -- or your registration  7 effort. So, that is one thing that we  8 actually just had training on yesterday  9 afternoon, statewide training on how to  10 properly fill out. There's actually a couple  11 of blocks on there that are mandatory and a  12 couple of blocks that are optional, but it's  13 not clear to the would-be voter which is  14 which. So, there is a bit of navigation  15 required just to register to vote. And if  16 you want to mail in your application, Alabama  17 does not provide an envelope. It does not  18 provide prepaid postage. So, that is an  19 expense that most people have to figure out  20 because most people don't have stamps lying  21 around the house anymore, and it actually  22 takes two stamps to mail your application  23 in.</p>	<p style="text-align: right;">Page 68</p> <p>1 of State's office?  2 A. I would say it's probably a letter  3 from the president to the Secretary of  4 State's office, but it could have been  5 through other means. So, there are several  6 ambiguities that we're seeking some guidance  7 on.  8 Q. How often do you vote?  9 A. Well, I vote when there is an  10 election in which I'm entitled to vote.  11 Q. Do you vote in general elections?  12 A. Yes.  13 Q. Primary elections?  14 A. Yes.  15 Q. Primary runoff elections?  16 A. Yes.  17 Q. Is it fair to say that you vote in  18 every election that you're able to?  19 A. It is fair to say that.  20 Q. Where do you currently vote?  21 A. I vote at Shades Crest Baptist  22 Church in Bluff Park, Hoover, Alabama.  23 Q. Have you ever had any problems</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. You referred to training earlier.  2 Is that training internally in the League?  3 A. No. Actually, there were some  4 other nonprofits on a Zoom call yesterday,  5 and we advertised this on our website. So,  6 anybody could have registered to Zoom in.  7 And there were a number of different kinds of  8 civic organizations on that Zoom yesterday  9 afternoon. It was about how to use the voter  10 registration form and about the voter  11 restoration effort and a little bit of  12 discussion about the new legislation and the  13 ambiguities there are.  14 Q. Have you ever interacted with the  15 Secretary of State's office?  16 A. No, I have not.  17 Q. Do you know if the League interacts  18 with the Secretary of State's office?  19 A. The League has interacted with the  20 Secretary of State's office.  21 Q. And so, the guidance that you had  22 referred to the League waiting on, did that  23 come about through an email to the Secretary</p>	<p style="text-align: right;">Page 69</p> <p>1 voting there?  2 A. No.  3 Q. Do you ever work at the polls on  4 election day?  5 A. I have not.  6 Q. Have you ever helped somebody vote  7 on election day?  8 A. No.  9 Q. Are you a member of any political  10 party at the state or county level?  11 A. No.  12 Q. What political primary do you  13 typically vote?  14 A. Why should I answer that?  15 MR. BLACKSHER: And you can choose  16 --  17 I think the witness can choose not  18 to answer the question of how she votes.  19 A. You can look it up anyway.  20 MR. SEISS: Are you instructing the  21 witness not to answer the question?  22 MR. BLACKSHER: No. I'll leave it  23 up to her, but I think that she has -- I</p>

<p style="text-align: right;">Page 70</p> <p>1 think she has the right under Alabama and 2 United States law to decline to say how she 3 votes. 4 Q. (By Mr. Seiss) Have you ever voted 5 straight ticket? 6 A. No. 7 Q. Have you ever attended a meeting of 8 a political party? 9 A. I have attended one meeting last 10 year of a political party because the speaker 11 was an expert on education initiatives in 12 Alabama, and I wanted to hear what she had to 13 say. 14 Q. Do you typically support a 15 particular political party? 16 A. What I typically do is to see what 17 the priorities and the policy positions are 18 of a candidate and support the candidate that 19 most closely aligns with my priorities and my 20 policy positions. 21 Q. And does that individual evaluation 22 tend to typically lead to your supporting one 23 particular party?</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. Do you think black people have a 2 say in that party's decisions? 3 A. Well, seeing as how I'm not on the 4 inside of either party structure in my county 5 or my state, I wouldn't have a real informed 6 position, but based on maybe leadership 7 positions that perhaps one party has more 8 leverage than other African Americans do, 9 just based on publicly available information 10 about who's in the leadership positions. But 11 I'm not privy to either party's behind-the- 12 scenes discussions or dialogue. 13 Q. Is it fair to say that there are 14 black people in leadership roles in the 15 Alabama Democratic Party? 16 A. Yes, that would be fair. 17 Q. Are there issues that you agree 18 with the Republican party on? 19 A. Yes. 20 Q. What are some of those issues? 21 A. I think that the parties -- both 22 parties, but certainly the Republican party 23 nationally has made an issue of the national</p>
<p style="text-align: right;">Page 71</p> <p>1 A. Over the last couple of decades, it 2 has led me to more one party than the other 3 only because the parties have diverged 4 significantly in their priorities and their 5 policy positions. They used to be more 6 closely aligned and had more nuanced 7 positions on -- example, tax policy or 8 tariffs, but it's not that way anymore. You 9 have a much more polarized party structure. 10 Q. Do you know how many times in the 11 last 10 years that you've voted for a 12 candidate from the party that you do not 13 typically support? 14 A. I would say a couple of times, and 15 again, this is a problem that's a Jefferson 16 County issue. I vote for the best judicial 17 candidates that are on the ticket after 18 careful research. Whichever party they are 19 in, it's the better candidate. 20 Q. Do you think that the party that 21 you typically vote for is open to black 22 people? 23 A. Yes.</p>	<p style="text-align: right;">Page 73</p> <p>1 debt. That's a true issue. I certainly 2 agree that something needs to be done about 3 it, the differences in how you make up the 4 shortfall in the incoming money to the 5 federal treasury. But the fact that we have 6 a trillion dollar or more national debt 7 should be of certain to both parties, and the 8 GOP, to their credit, has raised that as an 9 issue. I also agree that China is a real 10 issue, a real problem, and I think the GOP 11 has done a good job of calling that out. 12 Q. Anything else? 13 A. Well, if you give me time to think 14 about it. But no. I think that's good for 15 right now. 16 Q. Have you ever run for office? 17 A. No. 18 Q. Why not? 19 A. Why not? 20 Q. Yes. 21 A. Well, I've been a fairly nomadic 22 resident of various states, and so, that 23 really hasn't been in the cards.</p>



<p style="text-align: right;">Page 74</p> <p>1 Q. Have you ever been involved in a 2 political campaign? 3 A. Yes. 4 Q. What campaigns? 5 A. Oh, I can go back to Eugene 6 McCarthy, George McGovern, Barry Goldwater, 7 my father's campaigns, William Winter in 8 Mississippi. 9 Q. What campaigns have you been 10 involved in in the last 10 years? 11 A. When you say "involved," what does 12 that mean? 13 Q. Had a role in the campaign 14 apparatus? 15 A. None. I'm a loyal \$10.00 check 16 writer for various campaigns. 17 Q. And so, when you refer to McGovern 18 and Goldwater, is that the same kind of 19 involvement that you're referring to? 20 A. Well, if you remember when 21 Goldwater was running, I was a teenager at 22 that time. So, I wasn't writing any \$10.00 23 checks, but I was sort of rah-rahing from the</p>	<p style="text-align: right;">Page 76</p> <p>1 process? 2 A. What does who need? 3 Q. What does it mean to you -- 4 A. Oh. 5 Q. -- to be able to fully participate 6 in the political process? 7 A. Gosh, that's a great question. And 8 it really means a holistic view of the 9 political process. So, the end of that 10 process is the ballot box, but there's a 11 whole lot that comes before it. So, one of 12 the ways to participate fully is to have fair 13 maps for the districts. Another way is to 14 try to make voting as easy as possible for 15 those who are eligible and legally able to 16 vote. So, right now, Alabama makes it really 17 hard to vote. We don't have early voting. 18 We don't have drop boxes. We don't have 19 curbside voting as of 2021. We have really 20 rigid reasons to request an absentee ballot. 21 There's only a handful of reasons, and you 22 don't get an automatic absentee ballot if 23 you're over 65 or you're disabled. You have</p>
<p style="text-align: right;">Page 75</p> <p>1 sidelines. 2 Q. Other than with money, have you 3 ever publicly supported a political campaign 4 in the last 10 years? 5 A. Last 10 years? No, I don't think 6 so. I'm trying to -- with positions in the 7 League, we're really fairly stringent on 8 being nonpartisan. 9 Q. What is your perception of the 10 strength of the Alabama Democratic Party? 11 A. May I say that the Alabama 12 Democratic Party is in disarray, and it needs 13 restructuring; it needs reinvigoration of 14 leadership and probably needs a little bit 15 more grace and compassion internally so that 16 they can become a viable alternative to the 17 other party in Alabama -- if I could say this 18 -- if the reverse were true. It's always 19 better for citizens in democracy to have two 20 healthy parties competing against each 21 other. 22 Q. What does it mean to you to be able 23 to fully participate in the political</p>	<p style="text-align: right;">Page 77</p> <p>1 a really tricky voter registration form. You 2 have to physically get your ballot in on a 3 certain day, not a weekend as we know, on a 4 workday, and you cannot now give somebody gas 5 money to take you to the polls because that 6 runs afoul of newly passed legislation. The 7 Voting Rights Act has been interpreted to 8 mean it's not just going to the polls; it's 9 lots of ways that you're able to fully engage 10 in the political process. Our voter 11 registration forms, our ballots are not in 12 braille. They're not in Spanish. They are 13 really narrowly construed, as is the way you 14 get your ballot to the polls. So, all of 15 this is not helpful to being engaged in the 16 political process. 17 Q. So, is it fair to say that if the 18 ideal congressional districting map were 19 passed, that that would only be one piece, in 20 your view, of insuring that people can fully 21 participate in the political process? 22 A. I think that's an imminently fair 23 statement. And what is happening, if you</p>



<p style="text-align: right;">Page 78</p> <p>1 look at this again holistically, is that  2 voting is being made smaller. It's being  3 suppressed by a number of different things  4 working together in the synergy. So, the end  5 result is it's really hard to get an accurate  6 ballot at a certain time, a certain place  7 without running afoul of various legalities,  8 and you cannot -- you cannot appreciate,  9 living in an urban area like this, how hard  10 it might be to get to that one polling place  11 without a car on a certain time, certain day  12 when the person with the car is in a rural  13 county and has had to drive to another county  14 to go to work.  15 Q. Have you ever voted absentee in  16 Alabama?  17 A. I sure have, and it is not easy,  18 let me tell you.  19 Q. Can you explain what you mean by  20 that?  21 A. I first -- the first time I voted  22 absentee was 2016, and that meant that I had  23 to go to the Bessemer courthouse, not the</p>	<p style="text-align: right;">Page 80</p> <p>1 A. I believe I do.  2 Q. Are you aware of specific  3 individuals who have not been able to  4 understand the voter registration form?  5 A. I think that Alabama has a -- has a  6 considerable number of people who don't have  7 English as their first language or low  8 literacy or are disabled and would have to  9 really have help. And the print is not that  10 big, by the way, for people of a certain age  11 to be able to read it. I only found out  12 yesterday that two of those blocks were  13 optional because, again, it doesn't say  14 "optional" on there, and the blocks refer to  15 your race and your sex. But there's two  16 blocks at the top that ask whether you're a  17 U.S. citizen and whether you're 18, tiny  18 little blocks. And many people miss putting  19 an "X" in those blocks, in which case they  20 won't accept your application.  21 Q. What does it mean to you to be able  22 to have a voice in the political process?  23 A. Well, gosh, that covers a lot of</p>
<p style="text-align: right;">Page 79</p> <p>1 downtown courthouse because we have two  2 courthouses in Jefferson County. So, I have  3 to drive over there and submit my absentee  4 ballot, but there's no place to vote  5 privately. You're sitting at some chair in  6 the registrar's office, and you are hoping  7 that you have filled it all out correctly. I  8 voted -- during the Covid epidemic they  9 allowed some voting at the registrar's office  10 before election day, and I went over and  11 voted absentee there at the Bessemer court-  12 house again. The first time I tried to vote  13 absentee, I went to the wrong courthouse and  14 got turned around.  15 Q. You talked earlier about the voter  16 registration form. Do you know how long the  17 voter registration form is?  18 A. It's one page. On the opposite  19 side it's -- helpfully, it shows the  20 registrar's addresses for all the counties in  21 Alabama.  22 Q. Do you understand everything on the  23 voter registration form?</p>	<p style="text-align: right;">Page 81</p> <p>1 territory. But it means that you get all of  2 the rights guaranteed to you in the Bill of  3 Rights about expressing an opinion, even an  4 unfavorable opinion. It means that you get  5 to engage in free writing, free speech. It  6 means that you have an opportunity to get  7 informed and vote and then seek redress of  8 your grievances through the electoral process  9 or through your elected representatives.  10 It's a wide spectrum, thanks to our being a  11 democracy.  12 Q. In elections, do you believe that  13 every voter's voice is heard?  14 A. I think, again, as votes are -- as  15 districts are configured, some votes can  16 carry more weight than others. So, yes,  17 you're heard. You just aren't heard as  18 loudly in some places.  19 Q. So, if someone's ballot is counted,  20 but their candidate loses, does that mean  21 that their voice is not heard?  22 A. That was a little garbled. If you  23 could say that again, please?</p>

<p style="text-align: right;">Page 82</p> <p>1 Q. So, say you vote in an election, 2 and your vote is counted, but your preferred 3 candidate loses. Do you feel like you still 4 had a voice in that election? 5 A. Oh, sure. Absolutely. You don't 6 get to not -- you know, every time you lose 7 it doesn't mean you didn't have a voice. 8 Q. Because everyone's preferred 9 candidate can't always win, right? 10 A. Well, mathematically that's true. 11 But sometimes even losing carries a message. 12 So, when somebody has been an incumbent and 13 they barely squeak by, that might be a 14 wake-up call that they might need to pay more 15 attention to constituencies or they might 16 need to look at their positions on certain 17 issues. So, even losing can carry a message. 18 Q. I am about at the end of my 19 questions, but I'd like to take another 10- 20 minute break just to regroup with my team and 21 see if there's anything else that we need to 22 ask. Does that sound okay? 23 A. Sure.</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. What statistics are you referring 2 to? 3 A. I was referring to the difference 4 between the population of African Americans 5 in Alabama versus the percentage that are 6 incarcerated and the 27.6 percent versus the 7 52.7 percent that came up earlier. And I 8 wanted to make sure I had some of the verbs 9 correct from the Felony Expansion Law for 10 solicitation and conspiracy to commit the 11 crime versus the crime itself. So, just some 12 short notes on legislation and how it might 13 affect -- racially impact the population of 14 Alabama. 15 Q. So, the statistics and then notes 16 on SB1 and HB100, that's everything that's on 17 your notes? 18 A. I also have some notes on which -- 19 how many states allow in-person voting and 20 curbside voting and some of the ways that 21 voting is made easier, just numbers of 22 states. 23 Q. Is that --</p>
<p style="text-align: right;">Page 83</p> <p>1 MR. SEISS: So, let's break for 10 2 minutes and come back at 11:05. 3 (Break was taken.) 4 Q. (By Mr. Seiss) I just have a few 5 more questions, and then my colleague Mr. 6 Taunton will have a few questions as well for 7 you. You mentioned having notes with you for 8 this deposition? 9 A. Sure. 10 Q. Did you consult those notes at any 11 point during the deposition? 12 A. I think I reviewed them before we 13 started, and of course, during the break I 14 may have reviewed some of the statistics. 15 But yes. 16 Q. Why did you prepare notes for the 17 deposition? 18 A. Because I didn't want to be 19 inaccurate when I said something about 20 percentages, and I wanted to make sure I got 21 the specifics of the two pieces of 22 legislation that I felt might come up in this 23 deposition.</p>	<p style="text-align: right;">Page 85</p> <p>1 A. And -- 2 Q. Go ahead. 3 A. -- one thing because absentee 4 ballots is becoming an issue. And so, I also 5 have a note that says in 2022 primaries, only 6 25,000 absentee ballots were cast, and yet 7 the legislation, SB1 was allegedly about, 8 quote, "ballot harvesting." So, those are 9 the kinds of notes I have. 10 Q. Is there anything else sitting here 11 today that you expect to testify about at 12 trial that we have not discussed here today? 13 A. I don't believe so. You've been 14 fairly wide ranging. 15 Q. Do you have any additional 16 information related to the litigation that we 17 have not discussed here today? 18 MR. BLACKSHER: Object to form. 19 You may answer. 20 A. I don't have -- not having a 21 specific question, I don't have a specific 22 answer. 23 MR. SEISS: Okay. Thank you, Ms.</p>

<p style="text-align: right;">Page 86</p> <p>1 Slay. That's all the questions that I have.  2 As I mentioned, Mr. Taunton will have a few  3 questions for you.  4 EXAMINATION  5 BY MR. TAUNTON:  6 Q. Good morning, Ms. Slay. My name is  7 Michael Taunton. I'm with Balch &amp; Bingham,  8 and I represent the two legislator defendants  9 in this lawsuit. That's Representative  10 Pringle and Senator Livingston. We're not  11 going to be very long. I just had a couple  12 of follow-up questions that I wanted to ask  13 just sitting here, some things that I'd heard  14 said that I didn't quite understand. First,  15 since y'all just talked about your notes, I  16 do have a couple of follow-up questions on  17 that, and the first actually maybe is to your  18 counsel, which is whether he would mind  19 scanning and sending us a copy of those  20 notes.  21 MR. TAUNTON: I'd ask that they be  22 marked as Defendant's Exhibit 2.  23 Jim, is that fine?</p>	<p style="text-align: right;">Page 88</p> <p>1 for today's deposition, how did you prepare  2 those? Did you prepare those by consulting  3 Google? Were you talking with your counsel?  4 How did you prepare those notes?  5 A. Well, I reviewed testimony from my  6 deposition last year to see what questions  7 got brought up and what day that was shared.  8 I read the testimony of the two expert  9 witnesses that we have had input on. I've  10 read the pleadings from the most recent suit  11 by plaintiffs and defendants, and I have done  12 my normal work, which is to understand the  13 implications of SB1 and House Bill 100 and to  14 just get some recent information on how many  15 states allow what kinds of voting. So,  16 Google maybe, but more -- yes, and you know,  17 other publicly available information.  18 Q. Sure. Did your counsel have any  19 input into preparing those notes that --  20 A. No.  21 Q. -- you brought today?  22 A. No.  23 Q. Okay. And you said you read a</p>
<p style="text-align: right;">Page 87</p> <p>1 THE WITNESS: Will you scan notes  2 for him, my notes --  3 MR. BLACKSHER: What was the  4 question?  5 THE WITNESS: They want my notes.  6 MR. BLACKSHER: Well, I --  7 MR. TAUNTON: Jim, she brought  8 notes, and she --  9 MR. BLACKSHER: I'll do it (audio  10 faded out). I'll have to find somebody in  11 this office who can make a copy. We can get  12 it done.  13 MR. TAUNTON: Okay. If it's a  14 problem, I'm just across the street. So, I'm  15 happy to walk over and grab them, but I  16 figure it will be easiest if you scan them.  17 THE WITNESS: Balch &amp; Bingham.  18 MR. BLACKSHER: Yeah. Okay.  19  20 (Defendant's Exhibit No. 2 identified.)  21  22 Q. (By Mr. Taunton) Just a couple of  23 questions. When you were preparing the notes</p>	<p style="text-align: right;">Page 89</p> <p>1 couple of expert reports. Do you recall  2 which reports those were?  3 A. These are from the two academics  4 that I believe will be introduced, one from  5 the University of Alabama and the other from  6 the University of West Alabama, that have  7 some historical perspective on racial  8 politics in Alabama.  9 Q. Did you have any discussion with  10 those experts, you know, as they were  11 preparing their report? You don't have to  12 tell me --  13 A. I do --  14 Q. -- what they said.  15 A. -- not know them. I just read  16 their finished reports.  17 Q. Okay. Thank you. Just real quick,  18 going back and following up on one other  19 specific, you and Mr. Seiss earlier were  20 talking about the voter registration form,  21 and he had asked you if you were aware of any  22 specific individuals who could not understand  23 that form. I know you talked a little bit</p>

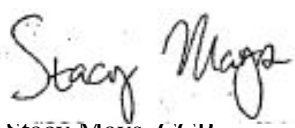
<p style="text-align: right;">Page 90</p> <p>1 about the font size, and you talked a little  2 bit about, you know, whether or not it was  3 available in a different language, Spanish or  4 a language like that. But I'm not sure I  5 actually heard a specific answer to that  6 question. So, I'll ask it, which is, are you  7 aware of any specific individuals who could  8 not understand the voter registration form?  9 A. I would say that with some of the  10 elderly people who are having to update their  11 form, it can be a little confusing at times.  12 I wouldn't go as far as saying they couldn't  13 understand it, but you may have to explain it  14 in a different way. There's a place that you  15 don't have to fill in, which is if you're  16 changing your name, and some people think you  17 have to fill in everything, and there's a  18 place that if you live in a rural area, you  19 have to draw a map. And so, some people  20 might think they have to draw a map when they  21 don't because they live in a city. So, it's  22 more sort of putting a full explanation on  23 the form, and that becomes somewhat more</p>	<p style="text-align: right;">Page 92</p> <p>1 person, one vote. So, let me ask you about  2 this. I think he had asked you whether that  3 meant more than equal population, and I think  4 you said that it did. Do you recall that  5 testimony? Am I recounting that correctly?  6 A. It meant more than equal  7 population?  8 Q. Yes, ma'am.  9 A. I don't -- I don't recall saying it  10 that way.  11 Q. Again, I'm probably summarizing.  12 So, maybe let me just ask the question again,  13 and we'll make sure that I recall for sure.  14 You had mentioned earlier one person, one  15 vote. What in your understanding does that  16 mean?  17 A. My understanding is that the votes  18 can be weighted equally so that the vote is a  19 viable way to have an opportunity to get the  20 candidate of your choice or the ballot  21 initiative of your choice to prevail. But  22 when districts are created so that there's an  23 overwhelming possibility that one point of</p>
<p style="text-align: right;">Page 91</p> <p>1 frequent when we go to assisted living or  2 nursing homes where people need to update  3 their precinct they're voting in.  4 Q. So, have you personally had to  5 explain --  6 A. Yes, I --  7 Q. -- portions of --  8 A. -- have. I'm --  9 Q. -- the --  10 A. -- sorry to be winding around, but  11 yes. The answer is yes.  12 Q. Okay. And when you provided that  13 explanation, did you feel like they under-  14 stood what they needed to do?  15 A. I do.  16 Q. You talked a couple of times in  17 this deposition about the weighting of votes,  18 and I wasn't sure I fully understood what you  19 meant by that. And so, I just wanted to  20 follow up a bit on that. I think maybe the  21 first time it came up -- it came up a couple  22 of times, but maybe the first time is when  23 you and Mr. Seiss were talking about a one</p>	<p style="text-align: right;">Page 93</p> <p>1 view prevails over another, that is not  2 allowing votes to be weighed equally.  3 Q. Okay.  4 A. If that makes sense.  5 Q. That's helpful. Let me just ask  6 you a couple of follow-up questions on that.  7 So, if -- and just go with me. If you don't  8 understand my hypothetical, let me know, and  9 we'll try to work through it. I want to make  10 sure I understand what you mean by weighed.  11 So, if we have a theoretical district of 100  12 people in it, and 90 of those people are  13 Republicans and 10 of those people are  14 Democrats, do you think that those votes then  15 are weighed equally?  16 A. You know, I'm not truly comfortable  17 with that question because you're not voting  18 the same for every possibility. So, again,  19 if you had 90 Republicans and 10 Democrats in  20 one district and 90 Republicans and 10  21 Democrats in another district, the results  22 might be different based on what the issues  23 are and whether there could be some crossing</p>



<p style="text-align: right;">Page 94</p> <p>1 over of points of view. So -- but if I'm one  2 of the 10 in the minority, it certainly  3 appears to me that my vote is not going to  4 carry the same weight because if people are  5 voting on party lines, if they're voting  6 straight ticket, then my vote will never  7 prevail.  8 Q. Okay. So, let me -- I think noting  9 your sort of -- what's the word I'm looking  10 for here -- reservations, I think you  11 answered the question. And so -- at least  12 enough that we can talk about this. So, if  13 we have two districts, and they have equal  14 population, but one is weighted very heavily,  15 you know, towards one party, and one has, you  16 know, equal weighting in a different way,  17 again, do you -- I'm not asking my question  18 very well. Is it your understanding that  19 under the scenario that I provided and that  20 you provided an answer to, that that would be  21 a violation of the one person, one vote  22 rule? Do you have an understanding of that?  23 MR. BLACKSHER: Object to form.</p>	<p style="text-align: right;">Page 96</p> <p>1 makeup of the district, not just based on the  2 fact that you voted for them?  3 A. As I expressed earlier, this whole  4 things is a holistic process. The  5 redistricting lines is one part of it. One  6 part of it is how many people have been  7 disenfranchised from voting in the first  8 place and for what reason, how many ways are  9 you allowing voters to get to the polls. So,  10 there are a spectrum of ways that all involve  11 the political process, and the Court has  12 ruled it's not just getting to the ballot  13 box; it's all the ways that a citizen has a  14 process to be involved and to have his or her  15 voice heard under the Voting Rights Act.  16 It's not just casting the ballot.  17 Q. Okay. So, do you understand that  18 is a legal -- do you understand that what we  19 just talked about -- you mentioned the Voting  20 Rights Act. I asked you about that. Talking  21 about the one person, one vote principle  22 though for a second, do you understand what  23 you just talked about is a legal requirement</p>
<p style="text-align: right;">Page 95</p> <p>1 You may answer.  2 A. To me, one person, one vote means  3 that everybody has an equal opportunity to  4 have their voice heard and that it has a  5 viable opportunity of prevailing at least  6 sometimes. That's, to me, what one person,  7 one vote is. Obviously, you can also  8 interpret it as overt voter suppression in  9 which you are preventing people from getting  10 to the ballot box; you are preventing them  11 from making it easier to get to the ballot  12 box. But when the day is done, it -- your  13 vote needs to count equally to other people  14 who are voting.  15 Q. (By Mr. Taunton) And when you say  16 "count equally," you mean that you have a --  17 that your candidate of choice has an  18 opportunity to win the election?  19 A. Sometimes. Perhaps not every time,  20 but has a chance of prevailing in the  21 electoral process.  22 Q. And you mean a chance to prevail  23 based on the demographics, based on the</p>	<p style="text-align: right;">Page 97</p> <p>1 under the one person, one vote principle, or  2 is that an aspirational goal under the one  3 person, one vote principle?  4 A. Okay. Since I'm not a lawyer, I'm  5 not going to answer the legal part, but I  6 would definitely say it should be an  7 aspirational goal of all of those who have a  8 role in the electoral process.  9 Q. But you don't know then whether or  10 not it's a legal requirement?  11 A. I would defer to the legal team on  12 that.  13 Q. Do you know whether the -- when the  14 districts were drawn by the Alabama state  15 legislature in 2021 following the 2020  16 census, whether each of those congressional  17 districts had equal population? Do you know?  18 A. I do not have firsthand knowledge  19 of it. I would assume that the legislature  20 made a good faith effort to meet population  21 guidelines when they drew that 2021 map  22 because it was a direct result of the census  23 of 2020.</p>

<p style="text-align: right;">Page 98</p> <p>1 Q. Do you know if when they redrew the</p> <p>2 map in 2023 at the special session whether</p> <p>3 those districts, congressional districts, had</p> <p>4 equal population under the 2020 census?</p> <p>5 A. I would say that to meet the</p> <p>6 requirements of the law that they would have</p> <p>7 to come as close as practical to doing that.</p> <p>8 It's -- you can make multiple maps meet</p> <p>9 population requirements that have other ends</p> <p>10 other than equal population.</p> <p>11 (Discussion off the record.)</p> <p>12 Q. (By Mr. Taunton) All right. Maybe</p> <p>13 just one other sort of line of questions</p> <p>14 here, and then I'll ask and make sure we're</p> <p>15 done. But you had stated earlier in your</p> <p>16 deposition that creating competitive</p> <p>17 elections was (a) a fundamental goal of</p> <p>18 redistricting or something to that effect.</p> <p>19 Have I characterized your testimony on that</p> <p>20 fairly?</p> <p>21 A. I would say it's a goal of</p> <p>22 redistricting.</p> <p>23 Q. Now, let me ask you this --</p>	<p style="text-align: right;">Page 100</p> <p>1 politics in general because the candidates</p> <p>2 would have to meet a broader spectrum of</p> <p>3 constituents, and they would have to answer</p> <p>4 for a whole spectrum of policies, and the</p> <p>5 likely result would be less extreme positions</p> <p>6 of whatever party, more moderation and more</p> <p>7 viable candidates in which citizens would be</p> <p>8 excited to vote and therefore, have a higher</p> <p>9 turnout for those elections.</p> <p>10 Q. And you would describe those as --</p> <p>11 those are the reasons then that you filed</p> <p>12 this lawsuit?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know whether a legislature</p> <p>15 is permitted -- and when I say "permitted," I</p> <p>16 mean legally permitted to draw district lines</p> <p>17 that favor one political party?</p> <p>18 A. Yes. The Supreme Court has said</p> <p>19 that they're not in a position of ruling on</p> <p>20 political gerrymandering; that is not the</p> <p>21 role of the courts. And so, since they</p> <p>22 haven't ruled on it, it appears that</p> <p>23 political gerrymandering has passed review.</p>
<p style="text-align: right;">Page 99</p> <p>1 A. Let me just add I'm not saying it's</p> <p>2 a legal goal. I'm saying it's a goal for the</p> <p>3 democratic process.</p> <p>4 Q. You anticipated my question, which</p> <p>5 is whether or not that was a legal goal or an</p> <p>6 aspirational goal. And so, I think you've</p> <p>7 answered that. Let me ask you this though:</p> <p>8 Did you file this lawsuit with the hopes of</p> <p>9 creating more politically competitive</p> <p>10 elections in the state of Alabama? Was that</p> <p>11 one of the reasons you filed this lawsuit?</p> <p>12 A. No. The reason we filed this</p> <p>13 lawsuit was to try to make a district where</p> <p>14 Jefferson County was whole, and that the</p> <p>15 Jefferson County citizens could vote for</p> <p>16 candidates that met the specific priorities</p> <p>17 and policy aspirations of Jefferson County</p> <p>18 citizens. I would say that based on history</p> <p>19 and some of the expert testimony from the</p> <p>20 professors that Jefferson County has a higher</p> <p>21 propensity to form coalitions, and it might</p> <p>22 be that we would end up not about political</p> <p>23 parties, but about more moderation in</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. Do you know whether avoiding</p> <p>2 pairing of incumbents against each other can</p> <p>3 be a goal of redistricting?</p> <p>4 A. It can be.</p> <p>5 Q. Do you have an opinion about</p> <p>6 whether or not that's a good or bad thing?</p> <p>7 A. Well, seeing as I'm not an</p> <p>8 incumbent, I would say no, I don't have an</p> <p>9 opinion. I think it just -- it creates</p> <p>10 problems for whatever party finds those two</p> <p>11 incumbents running against each other, but it</p> <p>12 is a goal, but not the superior goal of</p> <p>13 redistricting.</p> <p>14 Q. And I'm just sort of asking your</p> <p>15 opinions on this, but can avoiding pairing</p> <p>16 incumbents against each other be a good thing</p> <p>17 for democracy, you know, to try to make sure</p> <p>18 that a state has representatives who can gain</p> <p>19 seniority in their particular legislative</p> <p>20 body?</p> <p>21 A. I don't think that that's a goal</p> <p>22 that I support because incumbency generates a</p> <p>23 lot of money, and it generates complacency</p>



<p style="text-align: right;">Page 102</p> <p>1 with the incumbent, whoever he or she is, and  2 it would be great for democracy if incumbents  3 had to debate each other and explain their  4 votes to their constituents and let the  5 voters decide.  6 Q. And do you know whether legislative  7 projects can span more than one legislative  8 term?  9 A. When you say "legislative  10 projects," are you talking state or national?  11 Q. Either.  12 A. Yes, they can span more than one  13 legislative term.  14 Q. And so, to accomplish, you know,  15 some of those harder legislative projects,  16 might a legislator need to be elected to more  17 than one term?  18 A. No. As a matter of fact, what is  19 happening is there's a long-term national  20 infrastructure project in this country that  21 representatives are taking credit for in  22 Alabama that voted against it. So, I don't  23 see any advantage to their incumbency because</p>	<p style="text-align: right;">Page 104</p> <p>1 it was a few decades ago in the Congress.  2 Q. Okay. Do you have an understanding  3 of what role it plays today?  4 A. I have some thoughts on it, but I  5 am not an expert on congressional politics.  6 MR. TAUNTON: I don't have any  7 other questions, ma'am. I don't know if your  8 lawyer does or if Mr. Seiss has any follow-  9 ups, but I don't have any more. Thank you so  10 much.  11 THE WITNESS: You're welcome.  12 Do you have any questions?  13 MR. BLACKSHER: We have no  14 questions.  15 MR. TAUNTON: Thank you, Ms. Slay.  16 We appreciate you coming in this morning. I  17 know this kind of thing isn't fun, and I'm  18 sure Mr. Seiss feels the same way. But thank  19 you for sitting here and answering our  20 questions.  21 THE WITNESS: You're welcome.  22 (Deposition concluded at 11:30 a.m. Central  23 Standard Time.)</p>
<p style="text-align: right;">Page 103</p> <p>1 they didn't help that project at all.  2 Q. What about for those that did help  3 that project?  4 A. Well, they should run on that.  5 They should run on that vote and see if the  6 voters agree with them.  7 Q. Do you have any understanding of  8 the role that seniority of legislators plays  9 in legislative bodies?  10 A. Well, I understand that it used to  11 have a lot more power than it does now,  12 having the number of southern senators that  13 we have in charge of various committees.  14 Yes, I understand seniority in the Congress.  15 Q. When you say it has less role than  16 it does now, do you mean that it has less of  17 a role for Alabama than it does now, or it  18 has less of a role in the legislative bodies  19 than it does now?  20 A. I think it has less role than it  21 had back in the '40s, '50s, '60s in which the  22 chairs of the committees had a lot of power,  23 and it has not -- it is not to the same level</p>	<p style="text-align: right;">Page 105</p> <p>1 CERTIFICATE  2 STATE OF ALABAMA  3 LAUDERDALE COUNTY  4  5 I hereby certify that the above and  6 foregoing proceedings were taken down by me  7 in stenotype, and the questions and answers  8 thereto were reduced to computer print under  9 my supervision, and that the foregoing  10 represents a true and correct transcript of  11 the testimony given by said witness upon said  12 proceedings.  13 I further certify that I am neither  14 of counsel nor of kin to the parties to the  15 action, nor am I anyway interested in the  16 result of said cause.  17 Signed the 2nd day of August, 2024.  18  19   20  21 Stacy Mays, CCR  22 Alabama ACCR #229 - Expires 9/30/24  23</p>

[&amp; - absentee]

Page 106

<b>&amp;</b>	<b>1990s</b> 15:15	<b>2:21</b> 1:7,15 2:3	<b>60s</b> 103:21
<b>&amp;</b> 5:8,16 86:7 87:17	<b>19th</b> 19:13	<b>2nd</b> 105:17	<b>65</b> 76:23
<b>0</b>	<b>2</b>	<b>3</b>	<b>7</b>
<b>01530</b> 1:15 <b>01536</b> 2:3	<b>2</b> 4:10 27:2,7,13 28:17 31:22 40:6 48:18 58:3 86:22 87:20	<b>3</b> 43:5 <b>300</b> 5:12 65:1 <b>300152</b> 4:22 5:4 <b>306</b> 5:8 <b>320</b> 12:8 <b>34</b> 17:12 <b>35201</b> 5:9 <b>35203</b> 5:13 <b>35203-3331</b> 5:21 <b>35226</b> 12:9 <b>36117</b> 5:17 <b>36130-0152</b> 4:23 5:5 <b>3rd</b> 5:20	<b>7</b> 4:3 28:10 32:8 32:10 40:23 41:10 59:9,11 59:18,20 60:6 <b>70</b> 65:2 <b>7213</b> 15:23
<b>1</b>	<b>2000</b> 23:21 <b>2006</b> 50:23 <b>2016</b> 78:22 <b>2017</b> 33:15,17 <b>2020</b> 23:13 47:5 97:15,23 98:4 <b>2021</b> 4:9 25:8,9 25:21 39:6 40:17 76:19 97:15,21 <b>2021-555</b> 40:16 <b>2022</b> 85:5 <b>2023</b> 10:9 11:11 28:5 35:22 43:5 43:6,10 98:2 <b>2024</b> 2:18 6:7 26:7 31:7 32:20 34:3 57:15 105:17 <b>2025</b> 5:20 <b>21st</b> 5:12 <b>229</b> 105:22 <b>25,000</b> 85:6 <b>250</b> 65:1 <b>26.7</b> 35:3 <b>27</b> 35:2 <b>27.6</b> 84:6	<b>4</b>	<b>8</b>
<b>1</b> 4:9 14:21 37:17 40:8,11 57:9 <b>10</b> 44:5 71:11 74:10 75:4,5 82:19 83:1 93:13,19,20 94:2 <b>10.00</b> 74:15,22 <b>100</b> 33:14 37:17 88:13 93:11 <b>104</b> 4:4 <b>10:05</b> 44:8 <b>11:05</b> 83:2 <b>11:30</b> 104:22 <b>1291</b> 1:7 <b>14</b> 17:9 <b>16</b> 2:18 6:7 20:21 <b>18</b> 60:21 61:7 62:22 80:17 <b>18336</b> 105:20 <b>1920</b> 19:10 <b>1950</b> 12:6 <b>1971</b> 5:16 <b>1976</b> 18:2 20:15	<b>40</b> 4:9 33:23 58:21 <b>40s</b> 103:21	<b>80</b> 62:22 <b>86</b> 4:3,4 <b>87</b> 4:10	<b>9</b>
		<b>5</b>	<b>9/30/24</b> 105:22 <b>90</b> 93:12,19,20 <b>90s</b> 23:17 <b>9:00</b> 2:17 6:6
		<b>6</b>	<b>a</b>
		<b>6</b> 25:1 32:10,12 41:1,7 44:2	<b>a.m.</b> 2:17 6:6 104:22 <b>aauw</b> 19:7 <b>ability</b> 31:9 46:19 <b>able</b> 7:23 19:2 31:10 36:16 68:18 75:22 76:5,15 77:9 80:3,11,21 <b>above</b> 6:8 105:5 <b>absentee</b> 14:22 33:5,10 76:20 76:22 78:15,22 79:3,11,13 85:3

85:6 <b>absolutely</b> 82:5 <b>absorb</b> 47:23 <b>academic</b> 23:8 <b>academics</b> 12:1 89:3 <b>accept</b> 80:20 <b>acceptable</b> 58:11 <b>access</b> 65:6 <b>accomplish</b> 102:14 <b>account</b> 22:3,5 <b>accounts</b> 21:22 22:2,16 <b>accr</b> 105:22 <b>accurate</b> 7:17 10:5 78:5 <b>accused</b> 34:2,7 <b>acknowledged</b> 41:19 <b>act</b> 27:2,8,14 28:18,23 29:11 40:16 48:18 61:23 77:7 96:15,20 <b>acting</b> 6:2 <b>action</b> 105:15 <b>actions</b> 36:6 63:22 <b>active</b> 17:9 20:1 <b>actually</b> 38:5 44:17 50:11 53:3 64:22 66:8 66:10,21 67:3	86:17 90:5 <b>add</b> 8:10 28:21 52:3,14,16 99:1 <b>added</b> 27:8 34:5 34:16 50:23 <b>addition</b> 30:5 <b>additional</b> 85:15 <b>address</b> 31:5 35:21 44:22 53:19 62:11 <b>addresses</b> 31:3 79:20 <b>adopted</b> 43:7,10 57:14 <b>advantage</b> 102:23 <b>advertised</b> 67:5 <b>advocacy</b> 19:14 37:3,5,11 <b>affairs</b> 16:4,6 <b>affect</b> 34:14 35:7 84:13 <b>affects</b> 34:22 37:13 <b>afford</b> 50:3 <b>afoul</b> 77:6 78:7 <b>african</b> 21:3,9 21:10,12 35:2 43:14 59:6 65:3 72:8 84:4 <b>afternoon</b> 66:9 67:9 <b>age</b> 36:8 80:10	<b>ago</b> 13:16 22:21 26:2 38:11 44:15 104:1 <b>agree</b> 39:19 54:13,21 72:17 73:2,9 103:6 <b>agreed</b> 2:13 3:1 3:8,17 29:9 <b>ahead</b> 85:2 <b>aide</b> 17:19 <b>aimed</b> 34:17 <b>al</b> 1:5,10,13,18 2:1,6 <b>alabama</b> 1:2,9 1:18 2:5 4:21,22 5:3,4,9,13,17,21 6:2 7:7,9 11:7 12:9 15:14 23:12,16 28:16 30:18 33:20 35:3 36:7 37:2 38:8,13 50:20 51:9 54:17 66:2 66:16 68:22 70:1,12 72:15 75:10,11,17 76:16 78:16 79:21 80:5 84:5 84:14 89:5,6,8 97:14 99:10 102:22 103:17 105:2,22 <b>alabama's</b> 26:14	<b>alacourt</b> 65:6 <b>albemarle</b> 12:8 <b>aligned</b> 71:6 <b>aligns</b> 70:19 <b>alleged</b> 33:2 <b>allegedly</b> 85:7 <b>allen</b> 1:8,16 2:4 7:9 <b>allow</b> 52:21 84:19 88:15 <b>allowed</b> 34:12 34:13 79:9 <b>allowing</b> 60:11 93:2 96:9 <b>alternative</b> 75:16 <b>ambiguities</b> 65:12 67:13 68:6 <b>ambiguity</b> 33:7 <b>amended</b> 26:8 27:9 <b>amendment</b> 19:13 <b>america</b> 61:22 <b>american</b> 18:11 21:9,11,12 <b>americans</b> 21:3 35:2 43:14 59:7 65:3 72:8 84:4 <b>amm</b> 1:7,15 2:3 <b>analyses</b> 55:20 <b>answer</b> 7:18 8:8 8:22 53:5,7 54:3 54:8,9 55:9
---	--	--	---

[answer - based]

Page 108

<p>59:23 69:14,18 69:21 85:19,22 90:5 91:11 94:20 95:1 97:5 100:3 <b>answered</b> 94:11 99:7 <b>answering</b> 46:2 104:19 <b>answers</b> 46:3 54:6 105:7 <b>anticipated</b> 99:4 <b>anybody</b> 67:6 <b>anymore</b> 66:21 71:8 <b>anyway</b> 63:5 69:19 <b>anywise</b> 105:15 <b>apartment</b> 16:1 <b>apparatus</b> 74:14 <b>apparently</b> 58:10,23 <b>appeal</b> 52:22 <b>appearances</b> 4:17 <b>appears</b> 94:3 100:22 <b>application</b> 33:2 33:6 66:16,22 80:20 <b>applications</b> 14:23 33:1,11 <b>applied</b> 53:21</p>	<p><b>appreciate</b> 78:8 104:16 <b>area</b> 78:9 90:18 <b>arizona</b> 15:12 <b>army</b> 10:20 16:7 16:8 17:9,10 18:21 21:19 <b>artificially</b> 30:8 <b>artificial</b> 26:22 <b>artificially</b> 59:6 <b>asked</b> 11:17 53:21 65:15 89:21 92:2 96:20 <b>asking</b> 7:11 26:19 33:5 59:19 94:17 101:14 <b>aspirational</b> 97:2,7 99:6 <b>aspirations</b> 99:17 <b>assign</b> 3:13 <b>assignment</b> 61:19 <b>assistant</b> 4:19 5:1 17:6 <b>assisted</b> 91:1 <b>association</b> 18:12,23 21:19 <b>assume</b> 25:10 29:1 97:19 <b>assured</b> 65:17 <b>assuring</b> 59:4</p>	<p><b>attained</b> 16:3 <b>attempts</b> 36:11 43:12 <b>attended</b> 70:7,9 <b>attention</b> 23:12 23:20 36:5 37:11 82:15 <b>attorney</b> 4:20 4:20 5:2,7,11,15 5:19 7:7,8 <b>attorneys</b> 24:19 <b>audio</b> 22:12 26:5 40:17 48:23 53:14 87:9 <b>august</b> 10:9 27:20 105:17 <b>austin</b> 16:13 17:5 <b>authorized</b> 37:18 <b>automatic</b> 76:22 <b>available</b> 72:9 88:17 90:3 <b>avenue</b> 4:22 5:4 5:20 <b>avoiding</b> 101:1 101:15 <b>awaiting</b> 65:19 <b>aware</b> 11:6 27:7 28:15 36:4 65:22 80:2 89:21 90:7</p>	<p><b>b</b></p> <p><b>b</b> 16:5 <b>back</b> 13:4 23:8 25:21 27:20 44:8 57:9 74:5 83:2 89:18 103:21 <b>background</b> 37:10 <b>backwards</b> 55:13 <b>bad</b> 101:6 <b>balch</b> 5:8 86:7 87:17 <b>ballot</b> 33:1,3 49:9 53:20 56:21 60:22 64:3 66:6 76:10 76:20,22 77:2 77:14 78:6 79:4 81:19 85:8 92:20 95:10,11 96:12,16 <b>ballots</b> 33:4,11 77:11 85:4,6 <b>baptist</b> 68:21 <b>bar</b> 47:22 <b>barely</b> 82:13 <b>barry</b> 74:6 <b>based</b> 23:8 35:10 44:22 48:10 72:6,9 93:22 95:23,23 96:1 99:18</p>
---	--	---	---

[basis - certain]

Page 109

<b>basis</b> 27:6 56:1 <b>becoming</b> 85:4 <b>beginning</b> 6:6 <b>believe</b> 19:22 24:19 25:6 26:12,15 36:9 36:11 39:13 80:1 81:12 85:13 89:4 <b>ben</b> 7:7 <b>bend</b> 55:13 <b>benefits</b> 50:14 <b>benjamin</b> 4:19 <b>benning</b> 10:16 <b>berry</b> 5:16 <b>bessemer</b> 78:23 79:11 <b>best</b> 71:16 <b>better</b> 30:12 71:19 75:19 <b>big</b> 64:7 80:10 <b>bility</b> 29:13 <b>bill</b> 14:21 33:14 37:12,13,17,17 81:2 88:13 <b>bills</b> 37:4,7,19 45:13,16 <b>bingham</b> 5:8 86:7 87:17 <b>birmingham</b> 5:9 5:12,20 9:15 21:9 <b>bit</b> 33:16 55:17 66:14 67:11 75:14 89:23	90:2 91:20 <b>black</b> 36:8 58:18,19 71:21 72:1,14 <b>blacksher</b> 5:11 29:4 59:12 69:15,22 85:18 87:3,6,9,18 94:23 104:13 <b>blocks</b> 66:11,12 80:12,14,16,18 80:19 <b>blue</b> 59:18 <b>bluff</b> 68:22 <b>board</b> 20:8 57:5 <b>bobby</b> 1:5 <b>bodies</b> 103:9,18 <b>body</b> 101:20 <b>born</b> 12:5 <b>bottom</b> 26:18 40:16 <b>boundaries</b> 29:21 <b>box</b> 4:22 5:4,8 49:9 76:10 95:10,12 96:13 <b>boxes</b> 66:3 76:18 <b>braille</b> 77:12 <b>break</b> 8:20,23 44:5,9 82:20 83:1,3,13 <b>breaks</b> 8:20 <b>bring</b> 36:4 39:18	<b>brings</b> 49:23 <b>broader</b> 50:2 100:2 <b>brought</b> 11:23 87:7 88:7,21 <b>c</b> <b>call</b> 46:8 67:4 82:14 <b>called</b> 17:13 18:13 28:12 47:13 53:16 <b>calling</b> 46:4 73:11 <b>campaign</b> 74:2 74:13 75:3 <b>campaigns</b> 74:4 74:7,9,16 <b>candidate</b> 32:5 36:17 42:2 49:12 53:5,12 53:13 54:12 60:1 70:18,18 71:12,19 81:20 82:3,9 92:20 95:17 <b>candidates</b> 29:14 31:11,23 49:20 50:6,7,9 51:4,6,8,20 52:1 52:21 53:21 54:1,11,12 56:11 60:12 71:17 99:16 100:1,7	<b>capacity</b> 1:9,17 2:5 <b>car</b> 78:11,12 <b>cards</b> 73:23 <b>career</b> 10:15 17:16 <b>careful</b> 71:18 <b>carlisle</b> 16:9 <b>carolina</b> 15:13 61:20 <b>carried</b> 49:9 <b>carries</b> 82:11 <b>carry</b> 81:16 82:17 94:4 <b>case</b> 1:6,14 2:2 11:3,14 12:13 22:19 25:7,12 25:14 29:23 47:13,19 80:19 <b>cast</b> 46:19 64:3 85:6 <b>caster</b> 2:1 <b>casting</b> 96:16 <b>cause</b> 6:8 105:16 <b>ccr</b> 105:21 <b>census</b> 23:3,22 47:5 97:16,22 98:4 <b>central</b> 2:17 6:7 104:22 <b>ceo</b> 21:10 <b>certain</b> 19:15 34:15,17 55:18 56:2 73:7 77:3
--	--	--	---

[certain - complaint]

Page 110

78:6,6,11,11 80:10 82:16 <b>certainly</b> 14:4 30:4 32:14 37:16 72:22 73:1 94:2 <b>certificate</b> 64:18 105:1 <b>certify</b> 6:3 105:5 105:13 <b>cerv</b> 64:19 65:4 <b>chair</b> 17:21 56:22 79:5 <b>chairs</b> 103:22 <b>challenge</b> 32:13 <b>chance</b> 24:14,15 26:20 36:19 49:8,11,22 95:20,22 <b>change</b> 62:11 <b>changing</b> 38:16 90:16 <b>characterized</b> 98:19 <b>charge</b> 103:13 <b>charged</b> 20:10 48:11 <b>chase</b> 5:16 <b>check</b> 74:15 <b>checked</b> 66:4,5 <b>checks</b> 74:23 <b>children</b> 16:21 <b>chill</b> 30:21 32:17 35:9	<b>chilled</b> 31:8 <b>chilling</b> 33:12 <b>china</b> 73:9 <b>choice</b> 29:14 49:12 60:12 92:20,21 95:17 <b>choose</b> 50:7 54:7 64:4 69:15 69:17 <b>choosing</b> 36:17 <b>chose</b> 40:4 <b>chosen</b> 51:23 <b>church</b> 18:15 20:2 68:22 <b>citizen</b> 35:23 46:18 61:3 64:14 80:17 96:13 <b>citizen's</b> 34:21 <b>citizenry</b> 53:9 <b>citizens</b> 27:6 29:12 64:11 75:19 99:15,18 100:7 <b>citizenship</b> 61:5 <b>city</b> 55:2 90:21 <b>civic</b> 18:9 19:1 19:20 21:13 32:22 33:12 62:14 63:2 67:8 <b>civil</b> 6:4 17:15 <b>claim</b> 27:1,4,8 27:13,14 <b>claims</b> 26:17	<b>clay</b> 60:22 <b>clear</b> 8:6 41:20 66:13 <b>clearly</b> 42:4 <b>clemon</b> 5:19 <b>close</b> 58:19,22 59:2 98:7 <b>closely</b> 70:19 71:6 <b>club</b> 21:18 <b>coalition</b> 29:13 42:1 60:14 <b>coalitions</b> 36:15 99:21 <b>coasted</b> 32:14 <b>code</b> 13:18,20 <b>codified</b> 33:18 <b>cohesiveness</b> 30:7 <b>colleague</b> 83:5 <b>college</b> 16:7,8 16:10,12 18:21 <b>color</b> 24:10 <b>columbus</b> 15:10 <b>come</b> 14:7 21:20 37:10,17 44:8 47:13 53:2 56:7 57:6 67:23 83:2 83:22 98:7 <b>comes</b> 13:12 76:11 <b>comfortable</b> 93:16 <b>coming</b> 14:20 31:23 37:8 56:9	104:16 <b>commission</b> 17:8 56:16,22 <b>commissioner</b> 2:17 3:19 6:2 <b>commit</b> 84:10 <b>committee</b> 17:22 37:3,6,11 65:5 <b>committees</b> 103:13,22 <b>common</b> 28:13 30:7,11 <b>communities</b> 52:20 <b>compassion</b> 75:15 <b>compete</b> 50:7 <b>competing</b> 75:20 <b>competitive</b> 31:16,18 35:20 49:16 50:5,14 51:18 52:5,14 56:3,14 59:9,20 60:4,7,9 98:16 99:9 <b>competitiveness</b> 55:18 <b>complacency</b> 101:23 <b>complaint</b> 25:6 25:20 26:6,8,17 27:9
---	--	--	---



[complete - county's]

Page 111

<b>complete</b> 9:1 51:20	40:23 41:1,7,10 41:13 42:22	<b>constitution</b> 28:23 36:3	39:16 84:9 105:10
<b>complex</b> 16:1	43:5 44:1 47:3,7	<b>constitutional</b> 57:19	<b>correctly</b> 79:7 92:5
<b>compliance</b> 3:5 48:1	52:3,11 58:7 59:8,10,17,19	<b>constitutionally</b> 23:2	<b>council</b> 55:2
<b>complies</b> 28:17	60:8 77:18	<b>construed</b> 77:13	<b>counsel</b> 2:15 3:10,12 6:5
<b>compliment</b> 44:18	97:16 98:3 104:5	<b>consult</b> 83:10	86:18 88:3,18 105:14
<b>complimenting</b> 45:5	<b>congressman</b> 13:9	<b>consulting</b> 88:2	<b>count</b> 95:13,16
<b>computer</b> 105:8	<b>congressman's</b> 13:2	<b>contact</b> 13:17 44:14 45:18 46:5	<b>counted</b> 81:19 82:2
<b>concerned</b> 40:19	<b>congressmen</b> 58:4	<b>contacted</b> 13:10 13:14,21	<b>counties</b> 51:8 79:20
<b>concerns</b> 31:4,6 35:21	<b>congressperson</b> 12:18 13:21	<b>contacting</b> 44:12	<b>country</b> 102:20
<b>concerted</b> 21:6	<b>congruence</b> 30:1	<b>containing</b> 52:13	<b>county</b> 15:19 28:2,8,13,18,20 28:21,22 29:3,7 29:9,16 30:3,6,8 30:10,11 33:21 40:20,21,22 41:21 42:1 43:20,21,23 50:17 51:7,13 51:15,17,21 52:4,9,13,16,21 52:23 55:5,19 57:4,20 60:23 64:23 69:10 71:16 72:4 78:13,13 79:2 99:14,15,17,20 105:3
<b>concluded</b> 104:22	<b>considerable</b> 52:17 80:6	<b>context</b> 56:5 57:6	
<b>conclusion</b> 53:4	<b>considered</b> 42:11	<b>continue</b> 41:7	
<b>conclusions</b> 32:6	<b>conspiracy</b> 34:8 84:10	<b>continues</b> 40:20 43:22	
<b>conducted</b> 55:19	<b>constituencies</b> 30:14 49:7 82:15	<b>conversations</b> 46:14	
<b>configured</b> 81:15	<b>constituency</b> 50:2	<b>convicted</b> 34:2,3 34:6	
<b>confusing</b> 90:11	<b>constituent</b> 13:22 24:23	<b>conviction</b> 63:12	
<b>congress</b> 30:13 44:19 60:3 103:14 104:1	<b>constituents</b> 100:3 102:4	<b>convictions</b> 64:17	
<b>congressional</b> 12:10 28:9,16 30:9 31:16,18 31:22 32:8,11 35:20 36:7 38:19,22 40:5	<b>constitute</b> 35:2	<b>copy</b> 86:19 87:11	
		<b>correct</b> 8:11 27:21,22 29:2	<b>county's</b> 57:1

## [countywide - deposition]

Page 112

<b>countywide</b> 50:16 51:12,21 55:8 <b>couple</b> 12:22 20:1,15 26:2 36:12 38:11 41:9 51:1 54:19 55:7 56:18 66:10,12 71:1 71:14 86:11,16 87:22 89:1 91:16,21 93:6 <b>course</b> 8:12 38:4 55:14 83:13 <b>court</b> 1:1,8,16 3:6 6:1 7:14,23 8:13 10:12,16 30:15,17 39:9 39:13,15,17,19 39:21 40:4 43:17 47:19 49:5 55:15 57:14 58:11 79:11 96:11 100:18 <b>court's</b> 58:17 <b>courthouse</b> 78:23 79:1,13 <b>courthouses</b> 79:2 <b>courts</b> 29:9 100:21 <b>cover</b> 19:20 <b>covers</b> 80:23	<b>covert</b> 48:13 <b>covicted</b> 34:7 <b>covid</b> 79:8 <b>crack</b> 59:6 <b>create</b> 7:17 <b>created</b> 31:22 92:22 <b>creates</b> 101:9 <b>creating</b> 7:15 98:16 99:9 <b>credit</b> 73:8 102:21 <b>crest</b> 68:21 <b>crime</b> 33:19,22 34:3,7,9 84:11 84:11 <b>crimes</b> 34:1,5,16 <b>criteria</b> 24:23 28:22 29:22,23 30:3 42:17 43:1 47:19,23 49:5 <b>crossing</b> 93:23 <b>crunching</b> 38:16 <b>curbside</b> 76:19 84:20 <b>current</b> 12:10 21:7 32:7 <b>currently</b> 12:7 16:23 18:4,8 20:7 40:15 68:20 <b>cv</b> 1:7,15 2:3 <b>cycle</b> 23:19 37:1 38:2 56:15	<b>d</b> <b>d</b> 4:1 31:13 53:1 <b>data</b> 10:4 38:15 <b>date</b> 6:3 <b>david</b> 14:10 <b>day</b> 63:6 65:7 69:4,7 77:3 78:11 79:10 88:7 95:12 105:17 <b>deadline</b> 55:12 <b>debate</b> 53:6 54:13,21 56:23 102:3 <b>debates</b> 54:12 <b>debt</b> 64:15 73:1 73:6 <b>decades</b> 54:19 71:1 104:1 <b>decide</b> 102:5 <b>decided</b> 11:18 33:22 <b>decides</b> 34:4 <b>decisions</b> 21:4 48:17 72:2 <b>decline</b> 70:2 <b>decrease</b> 26:22 <b>defendant's</b> 4:8 40:8 86:22 87:20 <b>defendants</b> 1:11 1:19 2:7 11:3 86:8 88:11 <b>defer</b> 27:15 48:2 97:11	<b>define</b> 18:6 <b>definitely</b> 33:12 97:6 <b>degree</b> 16:14 <b>delay</b> 8:18 <b>democracy</b> 31:13 51:10 53:10 61:4 75:19 81:11 101:17 102:2 <b>democrat</b> 35:15 51:11 59:21 <b>democratic</b> 18:1 72:15 75:10,12 99:3 <b>democrats</b> 35:11 55:4 93:14,19,21 <b>demographic</b> 34:19 42:5 <b>demographics</b> 34:17 95:23 <b>denied</b> 26:13 34:1 <b>deny</b> 27:5 <b>depends</b> 48:12 <b>deposed</b> 10:6 <b>deposition</b> 2:15 2:20 3:3,4,15,18 7:12 8:9,12 10:10,22 12:3 27:20,23 56:5 83:8,11,17,23 88:1,6 91:17 98:16 104:22
--	--	--	--

## [depositions - elected]

Page 113

<b>depositions</b> 3:7	<b>disarray</b> 75:12	46:21 47:3,7,9	<b>duty</b> 17:9,12
<b>describe</b> 100:10	<b>discussed</b> 85:12	76:13 81:15	<b>e</b>
<b>described</b> 28:7	85:17	92:22 94:13	<b>e</b> 4:1
<b>desire</b> 28:1	<b>discussion</b> 20:4	97:14,17 98:3,3	<b>earlier</b> 14:15
<b>despondent</b>	67:12 89:9	<b>diverged</b> 71:3	19:21 44:12,13
49:14	98:11	<b>diversify</b> 21:6	46:15 47:12
<b>detailed</b> 53:7	<b>discussions</b>	<b>division</b> 1:3	48:22 52:8
54:6	72:12	<b>documents</b> 9:22	57:10 67:1
<b>detect</b> 8:1	<b>disenfranchised</b>	10:1 11:20 39:2	79:15 84:7
<b>develop</b> 20:10	63:11 96:7	<b>doing</b> 41:11	89:19 92:14
<b>developed</b> 19:17	<b>disproportion...</b>	48:11 49:13	96:3 98:15
<b>deviations</b> 23:4	34:14 35:7	55:1 64:13,21	<b>early</b> 15:15 38:6
<b>dialogue</b> 72:12	<b>district</b> 1:1,2	65:6 98:7	76:17
<b>difference</b> 27:12	13:20 23:5	<b>dollar</b> 73:6	<b>easier</b> 84:21
56:6 84:3	24:11 25:1	<b>dominated</b>	95:11
<b>differences</b> 73:3	28:10 29:12	54:18	<b>easiest</b> 87:16
<b>different</b> 14:19	31:19,22 32:8	<b>downside</b> 49:13	<b>easy</b> 76:14
15:19 20:2 21:7	32:12 36:8,20	<b>downtown</b> 9:15	78:17
24:16 30:13	40:6,23 41:1,2,4	79:1	<b>education</b> 16:3
31:10 37:7 40:3	41:7,10 42:22	<b>draw</b> 28:15 36:7	19:18 70:11
51:22 61:15	43:1,13,14 44:2	36:12 42:23	<b>effect</b> 3:4 35:16
67:7 78:3 90:3	44:17 48:1 50:5	90:19,20 100:16	98:18
90:14 93:22	50:10 52:4,11	<b>drawing</b> 41:16	<b>effort</b> 21:6
94:16	52:12 56:13	42:11,16 58:14	28:14 35:9 66:7
<b>differently</b> 60:5	58:3 59:5,9,10	<b>drawn</b> 36:21	67:11 97:20
<b>diluted</b> 46:21	59:18,18,20	46:22 59:6 60:5	<b>efforts</b> 30:23
<b>direct</b> 17:8	60:6,9 93:11,20	97:14	33:9
42:10 46:13	93:21 96:1	<b>drew</b> 97:21	<b>eight</b> 26:15
97:22	99:13 100:16	<b>drive</b> 12:8 78:13	<b>either</b> 8:18 32:3
<b>direction</b> 31:12	<b>districting</b>	79:3	72:4,11 102:11
<b>directly</b> 64:20	28:16 77:18	<b>driver's</b> 61:20	<b>elderly</b> 90:10
<b>dis</b> 58:20	<b>districts</b> 24:13	<b>drop</b> 76:18	<b>elect</b> 42:1
<b>disabled</b> 76:23	30:10 31:16	<b>dropped</b> 11:17	<b>elected</b> 81:9
80:8	32:4 35:21	<b>duly</b> 7:2	102:16
	36:13 41:13		

<b>election</b> 32:15 36:18,18,19 50:12,13 51:12 52:19 56:2,9,15 56:20 60:13 68:10,18 69:4,7 79:10 82:1,4 95:18 <b>elections</b> 41:23 49:16 50:15,16 51:15,17 55:16 55:18 57:6,15 68:11,13,15 81:12 98:17 99:10 100:9 <b>electoral</b> 81:8 95:21 97:8 <b>elicits</b> 49:19,20 <b>eligibility</b> 64:18 <b>eligible</b> 60:21 61:21 62:18 76:15 <b>email</b> 44:20 45:20 67:23 <b>emailed</b> 12:22 <b>employed</b> 16:23 <b>employment</b> 17:3 <b>encounter</b> 62:15 62:17 63:2 <b>encountered</b> 62:19,21 <b>encourage</b> 19:18	<b>ended</b> 40:5 <b>endorse</b> 38:23 <b>endorsed</b> 38:21 <b>ends</b> 98:9 <b>engage</b> 77:9 81:5 <b>engaged</b> 77:15 <b>engagement</b> 33:12 <b>english</b> 80:7 <b>enter</b> 53:18,19 <b>entitled</b> 68:10 <b>envelope</b> 66:17 <b>epidemic</b> 79:8 <b>epiphany</b> 64:7 <b>equal</b> 26:20 27:6 46:19 47:2 92:3,6 94:13,16 95:3 97:17 98:4 98:10 <b>equalize</b> 42:7 49:6 <b>equalized</b> 23:5 <b>equally</b> 92:18 93:2,15 95:13 95:16 <b>equivalent</b> 16:7 <b>et</b> 1:5,10,13,18 2:1,6 <b>eugene</b> 74:5 <b>evaluation</b> 70:21 <b>evan</b> 1:13 <b>everybody</b> 95:3	<b>everyone's</b> 82:8 <b>evidence</b> 3:15 42:10 <b>exact</b> 32:17 <b>exactly</b> 54:3 <b>examination</b> 4:2 6:9 7:4 86:4 <b>examined</b> 7:2 <b>example</b> 34:18 35:8 54:20 56:14 71:7 <b>except</b> 3:11 50:23 <b>excited</b> 50:11 100:8 <b>exclude</b> 34:21 35:6 <b>excuse</b> 18:21 59:12 <b>exhibit</b> 4:9,10 40:8,11 57:9 86:22 87:20 <b>exhibits</b> 4:7,8 <b>existing</b> 47:6 <b>expand</b> 34:4 <b>expanding</b> 65:13 <b>expansion</b> 84:9 <b>expect</b> 85:11 <b>expense</b> 66:19 <b>experience</b> 11:1 54:17 <b>expert</b> 11:4,23 70:11 88:8 89:1 99:19 104:5	<b>experts</b> 89:10 <b>expires</b> 105:22 <b>explain</b> 24:6 78:19 90:13 91:5 102:3 <b>explanation</b> 90:22 91:13 <b>expressed</b> 63:14 96:3 <b>expressing</b> 81:3 <b>extracted</b> 28:8 <b>extreme</b> 50:3 100:5
<b>f</b>			
<b>face</b> 30:2 42:21 <b>facebook</b> 22:3,6 22:8 <b>fact</b> 25:17 63:12 73:5 96:2 102:18 <b>faded</b> 22:13 26:5 40:18 48:23 53:14 87:10 <b>fair</b> 23:11,14 36:22 49:8 51:11,14 52:2 68:17,19 72:13 72:16 76:12 77:17,22 <b>fairly</b> 39:21 47:22 51:17 57:3 73:21 75:7 85:14 98:20			

<b>faith</b> 97:20 <b>fall</b> 18:18 34:23 55:16 <b>familiar</b> 59:23 <b>family</b> 61:1 <b>far</b> 90:12 <b>father</b> 60:21 <b>father's</b> 74:7 <b>faulkner</b> 14:10 15:3 45:9,22 <b>favor</b> 100:17 <b>federal</b> 6:4 11:18 17:15 26:13 36:3 73:5 <b>feel</b> 62:19 64:8 65:16 82:3 91:13 <b>feels</b> 104:18 <b>felonies</b> 34:10 34:11,20,23 35:6 65:14 <b>felons</b> 34:22 65:1 <b>felony</b> 33:15 63:11 64:17 84:9 <b>felt</b> 83:22 <b>field</b> 51:23 <b>fielded</b> 60:1 <b>figure</b> 66:19 87:16 <b>file</b> 99:8 <b>filed</b> 7:10 25:7 25:20 26:4,7 99:11,12 100:11	<b>filing</b> 3:18 <b>fill</b> 53:22 62:9 66:10 90:15,17 <b>filled</b> 79:7 <b>filter</b> 44:21 <b>find</b> 50:12 56:13 64:12 87:10 <b>finding</b> 29:13 <b>finds</b> 101:10 <b>fine</b> 86:23 <b>finger</b> 28:7,12 <b>finished</b> 89:16 <b>first</b> 7:2 19:5 23:19 61:10 62:1,10 78:21 78:21 79:12 80:7 86:14,17 91:21,22 96:7 <b>firsthand</b> 97:18 <b>five</b> 47:18 <b>florence</b> 6:2 <b>follow</b> 37:4 39:14 44:10 55:11 86:12,16 91:20 93:6 104:8 <b>followed</b> 36:22 38:4 <b>following</b> 6:9 37:12 89:18 97:15 <b>follows</b> 7:3 <b>font</b> 90:1 <b>force</b> 3:4	<b>foregoing</b> 6:5 105:6,9 <b>foregone</b> 32:6 53:4 <b>forgot</b> 8:9 <b>form</b> 3:11 29:4 36:15 42:1 66:1 67:10 77:1 79:16,17,23 80:4 85:18 89:20,23 90:8 90:11,23 94:23 99:21 <b>format</b> 7:22 8:17 <b>formed</b> 35:20 <b>forming</b> 29:13 <b>forms</b> 62:10 77:11 <b>fort</b> 10:16 <b>forward</b> 31:23 <b>fought</b> 32:1 <b>found</b> 39:20 63:10 80:11 <b>foundation</b> 18:21 <b>founded</b> 19:10 <b>four</b> 47:18 <b>franchise</b> 65:18 <b>free</b> 81:5,5 <b>frequent</b> 91:1 <b>full</b> 3:5 55:14,15 90:22 <b>fully</b> 75:23 76:5 76:12 77:9,20	91:18 <b>fun</b> 104:17 <b>fundamental</b> 98:17 <b>fundraising</b> 49:21 <b>funds</b> 10:20 <b>further</b> 3:1,8,17 31:8 32:17 105:13
<b>g</b>			
<b>gain</b> 101:18 <b>gang</b> 34:18 <b>garbled</b> 81:22 <b>gary</b> 12:15 <b>gas</b> 77:4 <b>geiger</b> 5:1 <b>general</b> 4:20,21 5:2,3 27:3 32:15 38:10 55:16 68:11 100:1 <b>general's</b> 7:8 <b>generally</b> 11:5 46:7 <b>generates</b> 101:22,23 <b>geography</b> 54:23 <b>george</b> 74:6 <b>georgia</b> 10:17 <b>germane</b> 20:3 27:17 <b>germany</b> 15:13 20:16			



**[gerrymander - holistic]**

Page 116

<b>gerrymander</b> 28:6 30:20 <b>gerrymandering</b> 24:5,7,9 27:12 100:20,23 <b>getting</b> 95:9 96:12 <b>gift</b> 33:7 64:8 <b>gingles</b> 29:22 47:14 <b>give</b> 35:1 48:3 49:14 54:6 73:13 77:4 <b>given</b> 105:11 <b>gives</b> 8:8 <b>giving</b> 51:3 <b>go</b> 33:16 43:18 44:20 53:18 57:9 61:17 62:2 74:5 78:14,23 85:2 90:12 91:1 93:7 <b>goal</b> 24:5,8 48:13 49:6 52:8 58:9 97:2,7 98:17,21 99:2,2 99:5,6 101:3,12 101:12,21 <b>goals</b> 29:19 48:4 48:9,12,13,23 49:2 <b>going</b> 7:11 28:7 34:4,14 35:7 43:3 47:17 48:2 49:10 56:19,20	60:16 65:18 77:8 86:11 89:18 94:3 97:5 <b>goldwater</b> 74:6 74:18,21 <b>good</b> 7:6 33:18 44:4 64:14 73:11,14 86:6 97:20 101:6,16 <b>google</b> 88:3,16 <b>gop</b> 58:4 60:1 73:8,10 <b>gosh</b> 76:7 80:23 <b>gotten</b> 15:3 <b>government</b> 11:7 30:19 63:17 <b>governor</b> 32:21 <b>grab</b> 87:15 <b>grace</b> 75:15 <b>graduate</b> 16:10 16:16 <b>graduated</b> 16:11 <b>graduating</b> 17:4 <b>grass</b> 61:4 <b>great</b> 20:22 76:7 102:2 <b>greater</b> 21:8 <b>grew</b> 60:20 <b>grievances</b> 81:8 <b>grocery</b> 14:8 <b>ground</b> 9:4 23:9 <b>grounds</b> 3:13	<b>group</b> 35:8 <b>grow</b> 15:5 <b>guaranteed</b> 36:13 81:2 <b>gubernatorial</b> 54:20 <b>guess</b> 18:20 <b>guidance</b> 39:15 65:19 67:21 68:6 <b>guidelines</b> 97:21 <b>h</b> <b>hand</b> 64:5 <b>handful</b> 50:21 76:21 <b>hands</b> 40:1 <b>happen</b> 31:2 <b>happened</b> 31:6 <b>happening</b> 31:21 53:4 54:4 77:23 102:19 <b>happens</b> 13:18 21:9 36:16 46:7 51:1 <b>happy</b> 87:15 <b>hard</b> 32:1 76:17 78:5,9 <b>harder</b> 102:15 <b>harvesting</b> 33:3 85:8 <b>hb100</b> 35:12 45:15 84:16 <b>head</b> 7:20 <b>healthy</b> 75:20	<b>hear</b> 36:14 70:12 <b>heard</b> 24:21 81:13,17,17,21 86:13 90:5 95:4 96:15 <b>hearings</b> 39:4 <b>heavily</b> 40:21 41:2 51:8 94:14 <b>hectic</b> 63:8 <b>help</b> 8:13 14:23 19:12 32:23 33:10 61:22 65:11 80:9 103:1,2 <b>helped</b> 62:7,9 64:17 65:1 69:6 <b>helpful</b> 51:10 53:8,10 54:11 58:10 77:15 93:5 <b>helpfully</b> 79:19 <b>helping</b> 65:21 <b>hiatuses</b> 20:16 <b>high</b> 16:16 47:22 49:18,19 <b>higher</b> 99:20 100:8 <b>highest</b> 16:2 <b>historical</b> 89:7 <b>history</b> 99:18 <b>hold</b> 13:2 <b>holistic</b> 35:16 76:8 96:4
---	---	---	--

<b>holistically</b> 78:1 <b>homes</b> 91:2 <b>hoover</b> 12:8 15:16,20,22,23 68:22 <b>hope</b> 36:16 <b>hopes</b> 99:8 <b>hoping</b> 79:6 <b>house</b> 17:7,21 33:14 37:17 38:20 66:21 79:12 88:13 <b>huh</b> 7:21,21 <b>human</b> 17:17 <b>hurts</b> 51:6,7 <b>hypothetical</b> 93:8	<b>important</b> 7:18 8:17 37:8 63:19 <b>importantly</b> 56:12 <b>inaccurate</b> 83:19 <b>incarcerated</b> 35:4 64:6 84:6 <b>include</b> 40:23 <b>includes</b> 34:11 <b>including</b> 52:4 <b>incoming</b> 73:4 <b>incumbency</b> 101:22 102:23 <b>incumbent</b> 32:10 53:5 54:7 54:9 55:4 57:3 60:2 82:12 101:8 102:1 <b>incumbents</b> 30:2 42:18 48:15 54:15,21 58:1,2,7 101:2 101:11,16 102:2 <b>individual</b> 57:5 70:21 <b>individuals</b> 80:3 89:22 90:7 <b>inferred</b> 34:17 <b>informal</b> 7:20 <b>information</b> 19:8 72:9 85:16 88:14,17 <b>informed</b> 19:19 37:7,16 53:9,9	64:2 65:5 72:5 81:7 <b>infrastructure</b> 102:20 <b>initial</b> 25:6 <b>initially</b> 58:5 <b>initiative</b> 44:18 45:1,4 92:21 <b>initiatives</b> 11:6 70:11 <b>input</b> 88:9,19 <b>inside</b> 72:4 <b>instituted</b> 61:23 <b>instructing</b> 69:20 <b>insuring</b> 77:20 <b>intelligence</b> 17:17 <b>inter</b> 63:21 <b>interacted</b> 67:14 67:19 <b>interacts</b> 67:17 <b>interest</b> 37:4 49:20 <b>interested</b> 23:6 23:10 53:20 105:15 <b>interesting</b> 13:15 56:10,18 <b>interestingly</b> 63:23 <b>interests</b> 52:22 <b>internally</b> 67:2 75:15	<b>interpret</b> 95:8 <b>interpreted</b> 77:7 <b>interrupt</b> 59:13 <b>intersections</b> 63:17 <b>introduced</b> 89:4 <b>involve</b> 96:10 <b>involved</b> 24:17 25:4 36:1 64:20 74:1,10,11 96:14 <b>involvement</b> 33:13 74:19 <b>involving</b> 33:4 <b>ish</b> 33:23 58:21 <b>issue</b> 71:16 72:23 73:1,9,10 85:4 <b>issues</b> 14:7,9,12 14:17,18,20 19:15 30:8 50:4 56:6,11,12,23 72:17,20 82:17 93:22
<b>i</b>			
<b>ideal</b> 29:8 57:21 57:22 77:18 <b>ideally</b> 29:15 <b>ideas</b> 32:2 <b>identified</b> 40:8 87:20 <b>imminently</b> 77:22 <b>impact</b> 14:22 26:21 84:13 <b>impacted</b> 32:22 <b>implausibility</b> 41:11 <b>implications</b> 23:9 88:13 <b>importance</b> 61:3			
			<b>j</b>
			<b>jabo</b> 14:2 <b>jackson</b> 16:12 <b>james</b> 5:11 <b>jefferson</b> 15:18 28:2,8,13,18,19 28:20 29:3,7,9 29:15 30:3 40:20,21,22 41:21 42:1 43:20,21,23

[jefferson - letter]

Page 118

50:17 51:7,13 51:17,21 52:4,8 52:13,16,20,23 55:5,19 57:1,4 57:20 64:23 71:15 79:2 99:14,15,17,20 <b>jim</b> 86:23 87:7 <b>job</b> 73:11 <b>johnson</b> 16:5 <b>join</b> 34:18 <b>joining</b> 60:14 <b>judge</b> 1:8,16 11:18 26:13 57:14 <b>judicial</b> 43:11 48:17 51:6 57:18 58:23 71:16 <b>july</b> 2:18 6:7 <b>justice</b> 49:4	<b>kinds</b> 67:7 85:9 88:15 <b>knew</b> 44:16 <b>know</b> 8:5,13,21 19:10 22:20 25:3,13,15 26:10 27:1 30:1 32:17 35:11,14 38:21 47:5,9 55:10,22,23 57:20,23 59:8 59:10,19 63:15 65:8,10 67:17 71:10 77:3 79:16 82:6 88:16 89:10,15 89:23 90:2 93:8 93:16 94:15,16 97:9,13,17 98:1 100:14 101:1,17 102:6,14 104:7 104:17 <b>knowledge</b> 42:5 97:18	<b>law</b> 5:8,12,15,19 9:14 33:6,15 36:3 49:5 65:13 70:2 84:9 98:6 <b>laws</b> 3:6 31:7 32:16,18,19 64:12 <b>lawsuit</b> 7:10,12 9:21 10:9 11:17 24:2,3 30:16 36:11 86:9 99:8 99:11,13 100:12 <b>lawyer</b> 27:4,16 97:4 104:8 <b>lawyers</b> 9:20 12:2 <b>lead</b> 70:22 <b>leaders</b> 37:18 <b>leadership</b> 20:6 72:6,10,14 75:14 <b>leading</b> 3:11 <b>league</b> 18:10 19:9 20:6,9,14 20:18,23 21:5,8 21:12 33:8 37:2 37:13,15,23 38:7,12,21,23 53:13,15 55:22 62:12 65:15 67:2,17,19,22 75:7 <b>league's</b> 21:4 <b>learn</b> 19:12	<b>leave</b> 46:3 69:22 <b>led</b> 36:6 71:2 <b>legal</b> 26:16 48:2 57:19 96:18,23 97:5,10,11 99:2 99:5 <b>legalities</b> 78:7 <b>legally</b> 76:15 100:16 <b>legislation</b> 35:17 67:12 77:6 83:22 84:12 85:7 <b>legislative</b> 17:5 17:19 36:23 45:11 101:19 102:6,7,9,13,15 103:9,18 <b>legislator</b> 36:5 86:8 102:16 <b>legislators</b> 36:5 48:10 103:8 <b>legislature</b> 11:7 14:8,21 28:5 30:19 31:7 32:20 33:17 34:4 35:22 38:3 38:10 39:3,7,14 40:17 43:7,11 46:9 97:15,19 100:14 <b>leonette</b> 2:15,20 6:8 7:1 9:12 <b>letter</b> 68:2
<b>k</b>	<b>l</b>		
<b>kallas</b> 9:15 <b>keep</b> 28:1 29:8 29:20 43:13,15 48:14 49:3 52:8 57:20 <b>keeping</b> 52:20 <b>kentucky</b> 15:13 <b>kept</b> 29:16 <b>key</b> 25:1,2 <b>kin</b> 105:14 <b>kind</b> 33:21 55:17 74:18 104:17	<b>laborious</b> 65:11 <b>laid</b> 47:19 <b>language</b> 58:17 58:20 80:7 90:3 90:4 <b>late</b> 25:9 45:10 <b>lauderdale</b> 105:3		

[level - mcgovern]

Page 119

<b>level</b> 16:2,7 21:10 32:13 38:20 54:23 69:10 103:23 <b>leverage</b> 72:8 <b>liaison</b> 20:10 <b>license</b> 61:21 <b>light</b> 59:18 <b>likely</b> 60:4 100:5 <b>line</b> 26:18 98:13 <b>lines</b> 23:5 38:16 56:13 59:5 60:5 94:5 96:5 100:16 <b>listed</b> 45:17 <b>literacy</b> 80:8 <b>literally</b> 41:12 <b>litigation</b> 11:21 22:15 24:18 25:2,4 85:16 <b>little</b> 31:13 33:16 66:2,3 67:11 75:14 80:18 81:22 89:23 90:1,11 <b>live</b> 35:19 41:4,7 44:1 46:10 90:18,21 <b>lived</b> 15:14,17 15:19,22 <b>living</b> 78:9 91:1 <b>livingston</b> 43:5 86:10	<b>llc</b> 5:16 <b>llp</b> 5:8 <b>local</b> 20:2 60:20 <b>location</b> 15:21 <b>locations</b> 15:20 <b>long</b> 15:14 20:13 23:10 54:6 79:16 86:11 102:19 <b>look</b> 11:9 31:4 31:20 32:3 35:17 51:16 57:1 69:19 78:1 82:16 <b>looked</b> 11:11 <b>looking</b> 35:15 35:16 94:9 <b>lose</b> 34:10 82:6 <b>loses</b> 81:20 82:3 <b>losing</b> 82:11,17 <b>lost</b> 55:10 <b>lot</b> 37:6 56:6,10 62:15 76:11 80:23 101:23 103:11,22 <b>lots</b> 56:23 77:9 <b>loudly</b> 81:18 <b>low</b> 80:7 <b>lowest</b> 54:22 <b>loyal</b> 74:15 <b>lying</b> 66:20 <b>lyndon</b> 16:5	<b>m</b> <b>m</b> 4:19 <b>ma'am</b> 92:8 104:7 <b>made</b> 3:10 21:5 22:18 72:23 78:2 84:21 97:20 <b>mail</b> 66:16,22 <b>mailing</b> 62:11 <b>majored</b> 61:2 <b>majority</b> 36:8 58:18,19 <b>make</b> 3:13 8:1 28:20 30:9,11 34:13 52:5,12 55:13 57:4 73:3 76:14 83:20 84:8 87:11 92:13 93:9 98:8 98:14 99:13 101:17 <b>makes</b> 56:6 76:16 93:4 <b>makeup</b> 42:5 96:1 <b>making</b> 22:21 60:10 95:11 <b>mandated</b> 23:3 <b>mandatory</b> 66:11 <b>manner</b> 8:6 <b>map</b> 4:9 28:5,16 29:7,10 31:3,5,8 35:22 36:6 39:6	39:12 40:16,17 40:18 41:3,5,6,8 41:9,17 42:12 42:16 43:15 44:2 57:11,14 57:16,17,23 58:6,12,15,17 59:9 77:18 90:19,20 97:21 98:2 <b>maps</b> 11:9 38:1 38:6,9,14,22 39:1 60:16 76:13 98:8 <b>marcus</b> 2:1 <b>mark</b> 40:11 <b>marked</b> 86:22 <b>married</b> 16:19 <b>master</b> 39:18 40:2 <b>master's</b> 16:4,6 16:13 <b>match</b> 13:20 <b>mathematically</b> 82:10 <b>matter</b> 7:14 63:18 102:18 <b>matters</b> 63:23 <b>mayors</b> 55:2 <b>mays</b> 2:16 6:1 105:21 <b>mccarthy</b> 74:6 <b>mcgovern</b> 74:6 74:17
--	--	---	--

[mean - new]

Page 120

<b>mean</b> 24:6 38:14 46:17 59:13 60:14 74:12 75:22 76:3 77:8 78:19 80:21 81:20 82:7 92:16 93:10 95:16,22 100:16 103:16 <b>means</b> 46:18 59:2 68:5 76:8 81:1,4,6 95:2 <b>meant</b> 63:15 78:22 91:19 92:3,6 <b>mechanisms</b> 30:21 <b>media</b> 21:21 22:2,15 38:5 <b>meet</b> 28:22 29:23 30:4 58:17 97:20 98:5,8 100:2 <b>meeting</b> 70:7,9 <b>meets</b> 57:18 <b>member</b> 17:6 18:4,9,10,11,13 18:15,20,22 20:13 21:14,16 24:22 69:9 <b>members</b> 38:8 38:10 <b>membership</b> 19:23 21:6 37:7	<b>memory</b> 44:19 47:18 <b>men</b> 20:21 <b>mention</b> 18:19 55:9 <b>mentioned</b> 11:13,22 19:21 44:12 46:15 47:12 56:4 83:7 86:2 92:14 96:19 <b>message</b> 46:4 82:11,17 <b>met</b> 24:22 25:17 29:10 99:16 <b>methodist</b> 18:15 <b>michael</b> 5:7 86:7 <b>middle</b> 50:1 <b>military</b> 10:15 13:2 17:13,16 <b>milligan</b> 1:13 12:13 <b>millsaps</b> 16:12 <b>mind</b> 13:12 21:20 86:18 <b>minded</b> 60:14 <b>minority</b> 28:9 40:22 94:2 <b>minute</b> 44:5 82:20 <b>minutes</b> 83:2 <b>mismanageme...</b> 10:19	<b>mississippi</b> 15:6 15:8,9 16:12 20:12 60:23 61:12 74:8 <b>misspoke</b> 8:10 <b>mistaken</b> 45:12 <b>moderate</b> 36:14 42:2 52:23 <b>moderation</b> 99:23 100:6 <b>money</b> 18:14 19:8 50:8 73:4 75:2 77:5 101:23 <b>montgomery</b> 4:22 5:4,17 37:19 <b>moral</b> 33:19,23 65:14 <b>morning</b> 7:6 86:6 104:16 <b>motor</b> 61:16 <b>mountain</b> 52:19 <b>moved</b> 23:16 61:14 <b>multiple</b> 14:6 47:23 98:8 <b>multiracial</b> 21:1 <b>myron</b> 5:15	53:2 62:12 86:6 90:16 <b>narrowly</b> 77:13 <b>national</b> 21:10 72:23 73:6 102:10,19 <b>nationally</b> 53:16 72:23 <b>navigate</b> 65:12 <b>navigation</b> 66:14 <b>near</b> 15:9 <b>necessary</b> 3:9 <b>need</b> 7:17 8:10 8:20,22 23:4,5 30:14 35:19 36:1 53:8 66:4 76:2 82:14,16 82:21 91:2 102:16 <b>needed</b> 91:14 <b>needs</b> 73:2 75:12,13,14 95:13 <b>neighborhood</b> 41:12 <b>neighborhoods</b> 28:9 42:3,6,9 <b>neither</b> 105:13 <b>nevada</b> 50:23 <b>never</b> 15:3 41:19 54:7 94:6 <b>new</b> 21:10 34:23 40:5 58:2 61:20 67:12
		<b>n</b>	
		<b>n</b> 2:12 4:1 <b>naacp</b> 33:8 65:15 <b>name</b> 7:6 9:11 22:5,7,9 28:13	



[newly - pairing]

Page 121

<p><b>newly</b> 31:21 35:20 77:6</p> <p><b>nomadic</b> 73:21</p> <p><b>nonpartisan</b> 19:6,11 75:8</p> <p><b>nonprofit</b> 18:13</p> <p><b>nonprofits</b> 67:4</p> <p><b>nonverbal</b> 8:1</p> <p><b>nonviable</b> 32:5</p> <p><b>normal</b> 88:12</p> <p><b>normally</b> 56:8 56:16</p> <p><b>north</b> 5:12,20 38:8,13</p> <p><b>northeast</b> 15:9</p> <p><b>northern</b> 1:2 28:21</p> <p><b>note</b> 85:5</p> <p><b>notes</b> 4:10 10:3 83:7,10,16 84:12,15,17,18 85:9 86:15,20 87:1,2,5,8,23 88:4,19</p> <p><b>notice</b> 3:18</p> <p><b>noting</b> 94:8</p> <p><b>nuanced</b> 71:6</p> <p><b>nugent</b> 17:20</p> <p><b>number</b> 4:2,7 29:16,22 30:3 49:17 50:3,5,8 50:10 60:2 67:7 78:3 80:6 103:12</p>	<p><b>numbers</b> 84:21</p> <p><b>nursing</b> 91:2</p> <tr> <td colspan="2" data-bbox="553 327 878 380"><b>o</b></td></tr> <tr> <td colspan="2" data-bbox="553 386 878 1919"> <p><b>o</b> 2:12</p> <p><b>object</b> 29:4 85:18 94:23</p> <p><b>objections</b> 3:10 3:13</p> <p><b>objectives</b> 30:11 42:20 47:20</p> <p><b>obligation</b> 61:5</p> <p><b>obtain</b> 64:18</p> <p><b>obviously</b> 61:2 63:7 95:7</p> <p><b>occasionally</b> 8:19</p> <p><b>occasions</b> 14:6</p> <p><b>offered</b> 3:15 51:4</p> <p><b>office</b> 4:20 5:2 7:8 13:5 54:5 61:18 62:3 67:15,18,20 68:1,4 73:16 79:6,9 87:11</p> <p><b>officer</b> 17:14</p> <p><b>officers</b> 18:23 55:8</p> <p><b>offices</b> 9:14 53:22</p> <p><b>official</b> 1:8,16 2:4</p> <p><b>oh</b> 14:6 22:7 44:15 74:5 76:4 82:5</p> </td></tr>	<b>o</b>		<p><b>o</b> 2:12</p> <p><b>object</b> 29:4 85:18 94:23</p> <p><b>objections</b> 3:10 3:13</p> <p><b>objectives</b> 30:11 42:20 47:20</p> <p><b>obligation</b> 61:5</p> <p><b>obtain</b> 64:18</p> <p><b>obviously</b> 61:2 63:7 95:7</p> <p><b>occasionally</b> 8:19</p> <p><b>occasions</b> 14:6</p> <p><b>offered</b> 3:15 51:4</p> <p><b>office</b> 4:20 5:2 7:8 13:5 54:5 61:18 62:3 67:15,18,20 68:1,4 73:16 79:6,9 87:11</p> <p><b>officer</b> 17:14</p> <p><b>officers</b> 18:23 55:8</p> <p><b>offices</b> 9:14 53:22</p> <p><b>official</b> 1:8,16 2:4</p> <p><b>oh</b> 14:6 22:7 44:15 74:5 76:4 82:5</p>	
<b>o</b>					
<p><b>o</b> 2:12</p> <p><b>object</b> 29:4 85:18 94:23</p> <p><b>objections</b> 3:10 3:13</p> <p><b>objectives</b> 30:11 42:20 47:20</p> <p><b>obligation</b> 61:5</p> <p><b>obtain</b> 64:18</p> <p><b>obviously</b> 61:2 63:7 95:7</p> <p><b>occasionally</b> 8:19</p> <p><b>occasions</b> 14:6</p> <p><b>offered</b> 3:15 51:4</p> <p><b>office</b> 4:20 5:2 7:8 13:5 54:5 61:18 62:3 67:15,18,20 68:1,4 73:16 79:6,9 87:11</p> <p><b>officer</b> 17:14</p> <p><b>officers</b> 18:23 55:8</p> <p><b>offices</b> 9:14 53:22</p> <p><b>official</b> 1:8,16 2:4</p> <p><b>oh</b> 14:6 22:7 44:15 74:5 76:4 82:5</p>					

 **okay** 9:4 17:4 20:5 21:21 22:14 44:7 58:6 60:16 82:22 85:23 87:13,18 88:23 89:17 91:12 93:3 94:8 96:17 97:4 104:2  **older** 20:22  **ones** 19:22  **open** 20:19,20 20:21 71:21  **opinion** 41:15 42:14 48:14 51:6,10 58:13 59:1 81:3,4 101:5,9  **opinions** 49:9 101:15  **opportunities** 36:13 38:18 60:11  **opportunity** 7:13 36:12 43:14 50:10 81:6 92:19 95:3 95:5,18  **opposed** 45:13 51:3  **opposite** 79:18  **opposition** 32:11  **optional** 66:12 80:13,14 | **oral** 6:9  **organiza** 37:4  **organization** 18:7 19:11,14 21:1  **organizations** 14:23 18:5,9,17 18:18 19:1,21 20:11 21:14 24:21 30:23 32:22 67:8  **original** 25:11 25:19  **originally** 19:11 34:12  **outreach** 11:1,8 19:18  **overruled** 39:9  **overt** 48:12 95:8  **overwhelming** 42:23 92:23  **own** 12:1 33:22 | **p** |  | | **p** 2:12 5:7  **p.o.** 4:22 5:4,8  **pack** 59:6  **packed** 24:10  **page** 4:2,7 8:7 43:4 79:18  **paid** 23:20 64:15  **pair** 58:2  **paired** 58:3  **pairing** 101:2 101:15 |  | |

## [pairs - plays]

Page 122

<b>pairs</b> 57:23 58:7 <b>palmer</b> 12:15,17 13:11 <b>panel</b> 11:19 26:13 57:18 <b>papers</b> 61:1 <b>par</b> 61:3 <b>pardons</b> 65:9 <b>park</b> 68:22 <b>part</b> 17:12 25:11 96:5,6 97:5 <b>participate</b> 53:3 53:17 75:23 76:5,12 77:21 <b>participation</b> 30:22 55:6 <b>particular</b> 11:10 13:7 42:8 53:23 54:1 56:7 70:15,23 101:19 <b>particularly</b> 7:22 8:17 51:15 <b>parties</b> 2:14 3:12 32:1 35:13 50:6 51:5 54:15 54:16 59:21 71:3 72:21,22 73:7 75:20 99:23 105:14 <b>partisan</b> 42:15 <b>parts</b> 64:14 <b>party</b> 17:23 18:2,2 31:14 32:3,5 42:2,21	50:7,19 51:23 54:18 60:10,11 69:10 70:8,10 70:15,23 71:2,9 71:12,18,20 72:4,7,15,18,22 75:10,12,17 94:5,15 100:6 100:17 101:10 <b>party's</b> 72:2,11 <b>pass</b> 13:8 43:11 <b>passage</b> 19:13 <b>passed</b> 28:6 32:20 35:22 39:7 58:23 65:13 77:6,19 100:23 <b>past</b> 17:2 41:22 <b>pay</b> 53:17 82:14 <b>paying</b> 23:12 64:13 <b>payment</b> 33:8 <b>pending</b> 8:21 <b>penn</b> 5:15,16 <b>pennsylvania</b> 16:9 <b>pentagon</b> 20:17 <b>peo</b> 18:13 19:7 <b>people</b> 20:21 24:10,14,14 27:5 30:13 31:1 31:9 32:2 34:13 36:14 42:20 49:8,14,23 51:2 52:18 54:5	55:11 56:17 58:22 59:4 60:12 62:9,15 62:17,19,21,23 63:2,10,13,16 63:21 64:5,11 64:16 65:16,21 65:23 66:19,20 71:22 72:1,14 77:20 80:6,10 80:18 90:10,16 90:19 91:2 93:12,12,13 94:4 95:9,13 96:6 <b>percent</b> 35:2,3,5 58:21 59:2 65:2 84:6,7 <b>percentage</b> 52:17 63:1 84:5 <b>percentages</b> 51:18 83:20 <b>perception</b> 75:9 <b>perfect</b> 57:6 <b>performance</b> 55:20 <b>permit</b> 50:21 <b>permitted</b> 50:20 100:15,15,16 <b>person</b> 10:10,20 25:18 26:19 32:4 46:16 56:21 57:2 59:4 61:11 63:5 78:12 84:19	92:1,14 94:21 95:2,6 96:21 97:1,3 <b>person's</b> 46:23 <b>personal</b> 10:3 25:16 <b>personally</b> 37:20 91:4 <b>personnel</b> 17:17 <b>perspective</b> 24:16 89:7 <b>perspectives</b> 31:10 <b>phone</b> 46:1,2 <b>physically</b> 62:1 77:2 <b>piece</b> 77:19 <b>pieces</b> 83:21 <b>place</b> 5:16 78:6 78:10 79:4 90:14,18 96:8 <b>places</b> 81:18 <b>plaintiffs</b> 1:6,14 2:2 7:10 9:20 11:3,5 24:20 25:11,14,17,20 26:7 88:11 <b>plan</b> 43:5,7,8,10 43:10 <b>platforms</b> 22:1 <b>played</b> 41:16,18 42:15 58:14,16 <b>playing</b> 50:16 <b>plays</b> 103:8 104:3
--	--	--	---

## [pleading - process]

Page 123

<p><b>pleading</b> 26:4</p> <p><b>pleadings</b> 11:2 11:14,14,16 12:1 88:10</p> <p><b>please</b> 8:5,12,20 9:11 52:6 59:15 81:23</p> <p><b>plethora</b> 31:23</p> <p><b>point</b> 15:1,6 16:17 57:4,17 61:12 62:20 63:14 83:11 92:23</p> <p><b>points</b> 25:2 94:1</p> <p><b>polarized</b> 71:9</p> <p><b>policies</b> 100:4</p> <p><b>policy</b> 53:1 54:10 70:17,20 71:5,7 99:17</p> <p><b>political</b> 16:15 29:21 30:7 33:13 49:3 54:23 61:2 69:9 69:12 70:8,10 70:15 74:2 75:3 75:23 76:6,9 77:10,16,21 80:22 96:11 99:22 100:17,20 100:23</p> <p><b>politically</b> 99:9</p> <p><b>politics</b> 42:15 60:20 61:1 89:8 100:1 104:5</p>	<p><b>polling</b> 78:10</p> <p><b>polls</b> 69:3 77:5,8 77:14 96:9</p> <p><b>population</b> 23:3 30:5 34:15 35:3 36:9 42:7 47:2 84:4,13 92:3,7 94:14 97:17,20 98:4,9,10</p> <p><b>populations</b> 47:6</p> <p><b>portions</b> 91:7</p> <p><b>position</b> 19:17 20:6 29:15 54:10 72:6 100:19</p> <p><b>positions</b> 19:15 53:1 70:17,20 71:5,7 72:7,10 75:6 82:16 100:5</p> <p><b>possi</b> 29:12</p> <p><b>possibilities</b> 41:22</p> <p><b>possibility</b> 13:19 26:23 92:23 93:18</p> <p><b>possible</b> 29:20 32:2 40:3 41:23 49:4 76:14</p> <p><b>postage</b> 66:18</p> <p><b>posted</b> 22:14</p> <p><b>potentially</b> 36:2</p> <p><b>power</b> 56:19 103:11,22</p>	<p><b>practical</b> 98:7</p> <p><b>precinct</b> 91:3</p> <p><b>precincts</b> 28:21 30:6 41:21</p> <p><b>predicate</b> 29:5</p> <p><b>prefer</b> 60:6,8</p> <p><b>preferred</b> 82:2 82:8</p> <p><b>prepaid</b> 66:18</p> <p><b>prepare</b> 10:21 83:16 88:1,2,4</p> <p><b>preparing</b> 87:23 88:19 89:11</p> <p><b>presented</b> 29:10 40:3</p> <p><b>president</b> 21:7 21:11 37:22 55:3 68:3</p> <p><b>press</b> 55:15</p> <p><b>pretty</b> 19:23 43:15 56:18</p> <p><b>prevail</b> 49:12 50:12 60:13 92:21 94:7 95:22</p> <p><b>prevailing</b> 49:22 95:5,20</p> <p><b>prevails</b> 60:11 93:1</p> <p><b>preventing</b> 95:9 95:10</p> <p><b>previous</b> 18:16 21:11 39:14 56:5</p>	<p><b>primaries</b> 85:5</p> <p><b>primarily</b> 28:8</p> <p><b>primary</b> 18:2 32:1,11 68:13 68:15 69:12</p> <p><b>principle</b> 46:16 96:21 97:1,3</p> <p><b>pringle</b> 86:10</p> <p><b>print</b> 80:9 105:8</p> <p><b>prior</b> 3:15</p> <p><b>priorities</b> 70:17 70:19 71:4 99:16</p> <p><b>priority</b> 49:17 49:18</p> <p><b>prisons</b> 35:4</p> <p><b>privately</b> 79:5</p> <p><b>privilege</b> 34:21 61:5</p> <p><b>privy</b> 72:11</p> <p><b>probably</b> 14:19 23:21,23 26:3 61:16 68:2 75:14 92:11</p> <p><b>problem</b> 71:15 73:10 87:14</p> <p><b>problems</b> 62:4 65:23 68:23 101:10</p> <p><b>procedure</b> 6:4</p> <p><b>proceedings</b> 6:10 36:23 105:6,12</p> <p><b>process</b> 24:9 33:13 53:3</p>
---	--	--	--

[process - recent]

Page 124

<p>65:11,12 76:1,6 76:9,10 77:10 77:16,21 80:22 81:8 95:21 96:4 96:11,14 97:8 99:3 <b>professional</b> 18:5,6,17 <b>professors</b> 99:20 <b>program</b> 17:13 17:14 <b>project</b> 102:20 103:1,3 <b>projects</b> 102:7 102:10,15 <b>promotions</b> 13:2 <b>propensity</b> 99:21 <b>properly</b> 66:10 <b>prospective</b> 32:23 <b>prove</b> 47:21 <b>provide</b> 9:1 66:17,18 <b>provided</b> 6:3 38:17 91:12 94:19,20 <b>public</b> 16:4,5,18 22:18 38:5 51:3 56:15 <b>publicly</b> 72:9 75:3 88:17</p>	<p><b>pull</b> 42:8 60:16 <b>pulled</b> 42:4 <b>purview</b> 13:8 <b>put</b> 32:4 42:18 54:3,8,10 <b>putting</b> 80:18 90:22</p> <p><b>q</b></p> <p><b>question</b> 8:21 8:22 13:16 18:16 20:22 27:16 29:5 52:12 59:14 69:18,21 76:7 85:21 87:4 90:6 92:12 93:17 94:11,17 99:4 <b>questionnaire</b> 53:6,12,14 55:6 <b>questionnaires</b> 53:22 55:1 <b>questions</b> 3:11 3:12 7:11,19 8:5 9:8 53:7 54:2 82:19 83:5,6 86:1,3,12,16 87:23 88:6 93:6 98:13 104:7,12 104:14,20 105:7 <b>quick</b> 89:17 <b>quite</b> 59:2 86:14 <b>quote</b> 33:3 85:8</p>	<p><b>r</b></p> <p><b>r</b> 53:2 <b>race</b> 35:10 41:16,18,20 42:11 53:23 54:1,20 56:7,14 56:17 57:3 58:14,16 80:15 <b>races</b> 38:20 51:21 53:19 57:7 <b>racial</b> 24:4,7,9 27:12 28:6 35:8 89:7 <b>racially</b> 30:20 84:13 <b>rah</b> 74:23 <b>rahing</b> 74:23 <b>raise</b> 19:8 50:8 <b>raised</b> 73:8 <b>raises</b> 18:13 <b>ramifications</b> 24:4 33:17 <b>ranging</b> 85:14 <b>rates</b> 56:19 <b>rather</b> 7:19 <b>reach</b> 50:1 <b>reached</b> 12:18 14:3,11,16 24:20 <b>reaching</b> 15:2 45:7 <b>read</b> 11:2,4,13 25:19,23 26:3,5 26:10,12 37:6</p>	<p>47:17 61:1 80:11 88:8,10 88:23 89:15 <b>reading</b> 3:2 37:10 <b>real</b> 72:5 73:9 73:10 89:17 <b>realistically</b> 36:16 <b>realizes</b> 8:9 <b>really</b> 19:7 20:3 32:12 33:18 41:2,23 54:18 73:23 75:7 76:8 76:16,19 77:1 77:13 78:5 80:9 <b>reason</b> 8:23 33:2 42:23 50:18 96:8 99:12 <b>reasonable</b> 24:15 49:11 56:13 <b>reasons</b> 29:17 29:18 43:9 56:19 64:5 76:20,21 99:11 100:11 <b>recall</b> 22:20,21 27:23 28:4,11 58:19 89:1 92:4 92:9,13 <b>received</b> 54:9 <b>recent</b> 26:6,17 88:10,14</p>
---	---	--	--

[recently - response]

Page 125

<b>recently</b> 11:12 12:23 26:1 41:8 44:16 51:22 61:18 62:18 <b>recognize</b> 30:18 <b>recognized</b> 41:19 <b>record</b> 7:13 98:11 <b>recounting</b> 92:5 <b>redistricting</b> 23:1,2,7,9,12,19 24:4 29:20 35:9 36:6 37:1 38:2 38:22 39:3 47:12,20 48:5,9 48:11 49:1,2,17 49:19 58:9 96:5 98:18,22 101:3 101:13 <b>redistrictings</b> 40:4 <b>redrawn</b> 39:17 41:8,9 <b>redress</b> 81:7 <b>redrew</b> 98:1 <b>reduced</b> 105:8 <b>refer</b> 74:17 80:14 <b>referenced</b> 19:2 50:15 <b>referred</b> 32:16 67:1,22 <b>referring</b> 11:15 14:13,18 32:18	39:10 53:11,12 74:19 84:1,3 <b>refined</b> 33:14 <b>refused</b> 56:22 <b>regarding</b> 11:8 36:23 65:14 <b>register</b> 60:19 61:6,10,22 62:2 62:8,10 63:6 64:1,4,19 65:22 66:1,15 <b>registered</b> 31:1 60:17 61:11,14 61:17,18 62:16 62:18 63:3 67:6 <b>registering</b> 62:5 <b>registrar</b> 66:5 <b>registrar's</b> 61:17 62:2 79:6 79:9,20 <b>registration</b> 62:10 66:6 67:10 77:1,11 79:16,17,23 80:4 89:20 90:8 <b>regroup</b> 82:20 <b>reintegrated</b> 64:9 <b>reinvigoration</b> 75:13 <b>reject</b> 66:5 <b>related</b> 14:9,12 14:17,18 85:16 <b>relating</b> 3:6	<b>relationship</b> 25:16 <b>relationships</b> 20:11 <b>relay</b> 46:12 <b>reliable</b> 63:5 <b>relocating</b> 15:18 <b>reluctant</b> 64:1 <b>remain</b> 43:22 <b>remainder</b> 17:11 <b>remember</b> 44:23 45:2 74:20 <b>reply</b> 54:7 <b>report</b> 89:11 <b>reporter</b> 6:1 7:15,23 8:13 <b>reports</b> 89:1,2 89:16 <b>represent</b> 7:8 17:23 43:6 57:13 86:8 <b>representative</b> 12:11,12,15,17 13:11,13,17 14:10 15:3 17:18,20 44:13 45:8,22 86:9 <b>representatives</b> 14:1 17:7 81:9 101:18 102:21 <b>represented</b> 18:1	<b>represents</b> 105:10 <b>republican</b> 35:15 51:8 52:18 59:21 72:18,22 <b>republicans</b> 52:3,15,16 93:13,19,20 <b>request</b> 76:20 <b>require</b> 65:4 <b>required</b> 66:15 <b>requirement</b> 96:23 97:10 <b>requirements</b> 29:11 47:13,15 48:17 98:6,9 <b>research</b> 38:7 38:13 49:23 71:18 <b>reservations</b> 94:10 <b>reserve</b> 17:11 17:14 18:22 <b>reside</b> 12:7 <b>resided</b> 15:11 15:12 <b>resident</b> 73:22 <b>resources</b> 17:17 <b>respect</b> 15:1 <b>respective</b> 2:14 <b>respond</b> 55:12 <b>response</b> 8:1 13:4,6 15:4
---	---	---	--



[restoration - senator]

Page 126

<b>restoration</b> 63:9 67:11	<b>rigid</b> 76:20	<b>sayig</b> 39:22	48:18
<b>restructuring</b> 75:13	<b>rime</b> 15:23	<b>saying</b> 31:15	<b>sections</b> 40:22
<b>result</b> 24:12 35:14 50:4 78:5 97:22 100:5 105:16	<b>role</b> 19:4 20:1 41:16,18 42:15 58:14,16 74:13 97:8 100:21 103:8,15,17,18 103:20 104:3	54:9 59:11 90:12 92:9 99:1 99:2	<b>secure</b> 65:1
<b>results</b> 31:21 52:19 54:2 57:2 93:21	<b>roles</b> 20:2 72:14	<b>says</b> 40:16 43:4 85:5	<b>see</b> 13:18 31:2 31:22 36:1 40:12,15 41:20 41:22 43:4 48:19 50:16 52:18 57:10 70:16 82:21 88:6 102:23 103:5
<b>retail</b> 61:1	<b>room</b> 9:16	<b>sb1</b> 32:22 45:14 84:16 85:7 88:13	<b>seeing</b> 54:14,16 55:5 72:3 101:7
<b>retroactive</b> 65:16	<b>roots</b> 61:4	<b>scan</b> 87:1,16	<b>seek</b> 81:7
<b>returning</b> 61:19	<b>rose</b> 32:13	<b>scanning</b> 86:19	<b>seeking</b> 68:6
<b>reverse</b> 75:18	<b>rough</b> 63:1	<b>scenario</b> 94:19	<b>seeks</b> 24:3 65:9
<b>review</b> 38:1 43:11 58:23 100:23	<b>roughly</b> 15:7 25:3	<b>scenes</b> 72:12	<b>seems</b> 41:1
<b>reviewed</b> 83:12 83:14 88:5	<b>rule</b> 94:22	<b>scholarships</b> 18:14 19:9	<b>seen</b> 38:8 39:6
<b>right</b> 13:12 23:17,18,21 27:5 31:12 34:1 34:11,22 35:1 46:8 52:10 64:10 65:2 70:1 73:15 76:16 82:9 98:12	<b>ruled</b> 96:12 100:22	<b>school</b> 16:5,16 16:18	<b>segments</b> 34:15
<b>rights</b> 27:2,8,13 28:17,23 29:11 30:23 48:18 77:7 81:2,3 96:15,20	<b>rules</b> 3:6 6:4 9:5	<b>science</b> 16:15 61:2	<b>seiss</b> 4:3,19 7:5 7:7 29:6 40:10 40:14 44:4,7,10 59:15,16,17 69:20 70:4 83:1 83:4 85:23 89:19 91:23 104:8,18
	<b>ruling</b> 100:19	<b>scores</b> 41:11	<b>senate</b> 13:3 14:21 37:17 38:20 45:17
	<b>run</b> 73:16 103:4 103:5	<b>screen</b> 40:11,15 57:11	<b>senator</b> 14:1,16 15:2 45:8,12,18 46:1,13,14 86:10
	<b>running</b> 48:15 54:5 74:21 78:7 101:11	<b>scroll</b> 43:3	
	<b>runoff</b> 68:15	<b>seaborn</b> 5:16	
	<b>runs</b> 77:6	<b>season</b> 56:9	
	<b>rural</b> 78:12 90:18	<b>seasons</b> 63:8	
	<b>s</b>	<b>second</b> 26:7 27:9 96:22	
	<b>s</b> 2:12	<b>secretary</b> 1:9,17 2:5 7:9 65:20 67:15,18,20,23 68:3	
	<b>safe</b> 41:2	<b>section</b> 27:2,7 27:13 28:17	
	<b>satisfy</b> 30:14 48:16		

[senators - started]

Page 127

<b>senators</b> 103:12	<b>showed</b> 42:4	<b>society</b> 64:9,15	53:1 80:2 85:21
<b>sending</b> 86:19	47:6	<b>solicitation</b> 34:8	85:21 89:19,22
<b>senior</b> 17:6,21	<b>showing</b> 57:10	34:18 84:10	90:5,7 99:16
<b>seniority</b> 101:19	<b>shown</b> 49:23	<b>solicitor</b> 5:2	<b>specifically</b>
103:8,14	<b>shows</b> 79:19	<b>solution</b> 29:8	11:15
<b>sense</b> 8:2 93:4	<b>side</b> 79:19	<b>somebody</b> 69:6	<b>specifics</b> 48:3
<b>september</b> 25:8	<b>sidelines</b> 75:1	77:4 82:12	83:21
25:9	<b>sierra</b> 21:18	87:10	<b>spectrum</b> 55:14
<b>servant</b> 17:15	<b>sign</b> 62:2	<b>someone's</b> 81:19	62:23 81:10
<b>served</b> 17:9,11	<b>signature</b> 3:2	<b>somewhat</b> 90:23	96:10 100:2,4
<b>service</b> 46:2	105:20	<b>soren</b> 5:1	<b>speech</b> 81:5
51:4 56:16	<b>signed</b> 32:21	<b>sorry</b> 22:7 91:10	<b>spent</b> 17:5
<b>session</b> 45:11	105:17	<b>sort</b> 44:21 56:16	<b>split</b> 28:18,19
98:2	<b>significantly</b>	74:23 90:22	29:2 30:9,12
<b>set</b> 49:5	71:4	94:9 98:13	40:20 43:19,22
<b>seven</b> 50:21	<b>singleton</b> 1:5	101:14	<b>splits</b> 29:7
<b>several</b> 13:16	7:10 25:14,20	<b>sought</b> 30:19	<b>splitting</b> 41:12
15:17 68:5	26:6	<b>sound</b> 82:22	<b>spoke</b> 37:19
<b>sewell</b> 12:13	<b>site</b> 53:18	<b>south</b> 15:13	<b>sponsor</b> 45:17
13:13,17 44:13	<b>sitting</b> 79:5	61:20	<b>sponsors</b> 45:13
<b>sex</b> 80:15	85:10 86:13	<b>southern</b> 1:3	<b>squeak</b> 82:13
<b>shades</b> 68:21	104:19	103:12	<b>stacy</b> 2:16 6:1
<b>shaking</b> 7:20	<b>size</b> 90:1	<b>span</b> 102:7,12	105:21
<b>share</b> 19:8	<b>slay</b> 2:16,20 6:8	<b>spanish</b> 77:12	<b>staff</b> 12:22 13:1
40:10	7:1,6 9:12,13	90:3	46:6 55:11
<b>shared</b> 88:7	22:8,8,10,10,11	<b>speak</b> 37:18,20	<b>staffer</b> 13:7 46:3
<b>she'll</b> 7:15	22:12 60:17	37:22 56:12	<b>stamps</b> 66:20,22
<b>shelby</b> 28:22	86:1,6 104:15	<b>speaker</b> 70:10	<b>standard</b> 2:18
30:6	<b>sleeper</b> 56:8,17	<b>speaking</b> 8:16	6:7 33:20
<b>sheriff</b> 60:22	<b>slow</b> 59:14	8:19 37:14	104:23
<b>short</b> 46:4 84:12	<b>small</b> 38:17	<b>special</b> 39:18	<b>starkville</b> 15:10
<b>shortfall</b> 73:4	<b>smaller</b> 78:2	40:2 98:2	<b>start</b> 9:9 48:8
<b>show</b> 31:9 38:16	<b>social</b> 21:21	<b>specific</b> 10:4	<b>started</b> 62:1
47:23	22:1,15	32:19 47:18	83:13
		48:21 52:22	

[state - taunton]

Page 128

<b>state</b> 1:10,18 2:6 4:21 5:3 7:9 9:11 11:7,16 13:23 14:1,9 20:8 30:20 33:20 35:4 38:20 48:21 65:20 69:10 72:5 97:14 99:10 101:18 102:10 105:2 <b>state's</b> 67:15,18 67:20 68:1,4 <b>stated</b> 98:15 <b>statement</b> 23:15 77:23 <b>statements</b> 22:18 <b>states</b> 1:1 17:8 21:19 50:21,22 61:15 70:2 73:22 84:19,22 88:15 <b>statewide</b> 51:16 51:20 66:9 <b>stationed</b> 20:16 <b>statistic</b> 35:1 <b>statistics</b> 64:22 83:14 84:1,15 <b>stay</b> 8:7 <b>stereotype</b> 105:7 <b>step</b> 31:12 <b>stipulated</b> 2:13 3:1,8,17	<b>stipulation</b> 6:5 <b>stood</b> 91:14 <b>storms</b> 57:6 <b>story</b> 51:22 <b>straight</b> 50:19 51:2,9 70:5 94:6 <b>straightforward</b> 39:22 <b>street</b> 5:12 87:14 <b>streets</b> 41:9 <b>strength</b> 46:23 75:10 <b>stringent</b> 75:7 <b>structure</b> 71:9 72:4 <b>study</b> 19:15,16 <b>subcommitee</b> 64:21 <b>subcommittee</b> 65:8 <b>subcommuniti...</b> 63:20 <b>subdivisions</b> 49:3 <b>submit</b> 39:2 79:3 <b>submitted</b> 38:2 38:6,9 <b>subsequently</b> 61:13 <b>suit</b> 26:14 88:10 <b>suite</b> 5:20 <b>summarizing</b> 92:11	<b>summer</b> 13:1 <b>superficially</b> 59:22 <b>superior</b> 101:12 <b>supervision</b> 105:9 <b>support</b> 29:6 70:14,18 71:13 101:22 <b>supported</b> 35:11 75:3 <b>supporting</b> 70:22 <b>suppositions</b> 26:14 <b>suppressed</b> 78:3 <b>suppression</b> 95:8 <b>supreme</b> 39:9 39:15 100:18 <b>sure</b> 14:15 29:19 34:13 35:17 39:8 42:19 55:13 59:16 60:10 78:17 82:5,23 83:9,20 84:8 88:18 90:4 91:18 92:13,13 93:10 98:14 101:17 104:18 <b>surface</b> 57:8 <b>surmise</b> 44:20 <b>surprise</b> 55:15	<b>suspect</b> 45:10 <b>suspended</b> 33:9 <b>swath</b> 50:2 <b>sworn</b> 7:2 <b>synergy</b> 78:4 <b>system</b> 53:16 <b>t</b> <b>t</b> 2:12,12 <b>tailored</b> 53:23 <b>take</b> 8:19 40:1 40:21 44:5 77:5 82:19 <b>taken</b> 2:16 10:4 24:11 44:9 65:18 83:3 105:6 <b>takes</b> 19:15 66:22 <b>talk</b> 8:14 12:2 13:1 19:3 29:18 94:12 <b>talked</b> 27:19 44:11 45:7 52:7 55:17 63:13 79:15 86:15 89:23 90:1 91:16 96:19,23 <b>talking</b> 31:13 45:14 47:1 60:20 88:3 89:20 91:23 96:20 102:10 <b>tariffs</b> 71:8 <b>taunton</b> 4:4 5:7 83:6 86:2,5,7,21
--	---	---	---

[taunton - try]

Page 129

87:7,13,22 95:15 98:12 104:6,15 <b>tax</b> 14:8 71:7 <b>taxes</b> 64:13 <b>team</b> 48:2 82:20 97:11 <b>technical</b> 48:17 <b>technician</b> 17:13 <b>teenager</b> 74:21 <b>tell</b> 17:2 27:16 46:9 78:18 89:12 <b>tend</b> 70:22 <b>tends</b> 34:19 <b>tennessee</b> 20:12 <b>term</b> 102:8,13 102:17,19 <b>terms</b> 19:6 27:3 47:2 51:18 60:3 <b>terri</b> 12:13 <b>territory</b> 81:1 <b>testified</b> 7:3 10:12,16 27:19 <b>testify</b> 85:11 <b>testifying</b> 28:1,4 <b>testimony</b> 7:14 8:11 9:1 10:5 11:4,23 28:11 56:2 88:5,8 92:5 98:19 99:19 105:11 <b>texas</b> 16:6 17:6 18:3	<b>thank</b> 46:12 59:15 85:23 89:17 104:9,15 104:18 <b>thanks</b> 81:10 <b>theoretical</b> 93:11 <b>thereto</b> 3:16 105:8 <b>thing</b> 33:18 43:12 47:22 66:7 85:3 101:6 101:16 104:17 <b>things</b> 37:16 44:11 56:8 78:3 86:13 96:4 <b>think</b> 13:17 20:4 22:8,11 23:14 26:18 31:20 32:9 35:23 39:12,21 40:18 41:18 43:8,9,19 48:4,10,20,23 49:16,18,21 51:14 52:7 56:4 57:15 58:8,20 59:3 63:10,16 63:18,22 64:2 69:17,23 70:1 71:20 72:1,21 73:10,13,14 75:5 77:22 80:5 81:14 83:12 90:16,20 91:20 92:2,3 93:14	94:8,10 99:6 101:9,21 103:20 <b>third</b> 50:7 <b>thought</b> 28:5 43:2 51:3 58:22 <b>thoughtful</b> 54:6 <b>thoughts</b> 104:4 <b>three</b> 1:8,16 11:18 26:13 40:3 50:10 57:14 <b>thresholds</b> 57:19 <b>ticipation</b> 61:4 <b>ticket</b> 51:2,9 70:5 71:17 94:6 <b>time</b> 2:18 3:14 3:14 6:7 23:10 33:21 44:5 49:10 56:20 62:11 73:13 74:22 78:6,11 78:21 79:12 82:6 91:21,22 95:19 104:23 <b>times</b> 12:23 71:10,14 90:11 91:16,22 <b>tiny</b> 66:3 80:17 <b>tion</b> 37:5 <b>title</b> 20:5 <b>today</b> 7:12 9:2 9:13 12:3 85:11 85:12,17 88:21 104:3	<b>today's</b> 88:1 <b>together</b> 56:9 57:7 78:4 <b>told</b> 39:22 <b>top</b> 43:4 80:16 <b>totally</b> 64:9 <b>tough</b> 57:3 <b>towards</b> 94:15 <b>training</b> 66:8,9 67:1,2 <b>transcript</b> 7:16 7:18 105:10 <b>transitioned</b> 17:10 <b>transportation</b> 17:22 <b>treasury</b> 73:5 <b>trial</b> 3:14 85:12 <b>tricky</b> 66:2 77:1 <b>trict</b> 58:21 <b>tried</b> 13:16 79:12 <b>trillion</b> 73:6 <b>true</b> 7:22 32:7,9 32:10 73:1 75:18 82:10 105:10 <b>truly</b> 93:16 <b>truthful</b> 9:1 <b>try</b> 8:5,14 26:22 30:21 42:18,23 44:14 45:18 49:3,6 54:11 55:12 76:14 93:9 99:13
--	---	---	--

[try - vote]

Page 130

101:17 <b>trying</b> 20:10 30:1 42:6 75:6 <b>turned</b> 61:7 79:14 <b>turnout</b> 30:22 41:20 50:13 100:9 <b>turpitude</b> 33:19 33:23 65:14 <b>tuscaloosa</b> 15:18 <b>tweaks</b> 43:16 <b>twice</b> 57:2 <b>twitter</b> 22:9 <b>two</b> 12:1 15:19 17:5 21:20 30:9 30:12 31:11 32:19 41:13 45:16 50:8 58:4 58:7 66:22 75:19 79:1 80:12,15 83:21 86:8 88:8 89:3 94:13 101:10 <b>typically</b> 69:13 70:14,16,22 71:13,21	<b>under</b> 27:1 34:23 41:4,10 44:2 70:1 91:13 94:19 96:15 97:1,2 98:4 105:8 <b>undergraduate</b> 16:11,14 <b>underline</b> 22:12 <b>underpopulated</b> 47:10 <b>underscore</b> 24:3 37:15 <b>understand</b> 8:4 9:5 26:16 27:11 47:14 58:3 59:13 61:3 79:22 80:4 86:14 88:12 89:22 90:8,13 93:8,10 96:17 96:18,22 103:10 103:14 <b>understanding</b> 22:23 24:1 43:17 64:6 92:15,17 94:18 94:22 103:7 104:2 <b>understood</b> 91:18 <b>unedited</b> 54:3 <b>unfavorable</b> 81:4	<b>unhoused</b> 63:20 <b>united</b> 1:1 17:8 18:15 21:19 70:2 <b>university</b> 16:6 18:12 89:5,6 <b>update</b> 90:10 91:2 <b>updated</b> 33:15 <b>ups</b> 104:9 <b>urban</b> 78:9 <b>use</b> 67:9 <b>used</b> 21:14,16 45:23 46:1 66:1 71:5 103:10 <b>usually</b> 46:2 51:12 <b>ut</b> 16:13 17:4	<b>victory</b> 32:14 <b>view</b> 57:17 63:14 76:8 77:20 93:1 94:1 <b>views</b> 50:3 <b>village</b> 15:23 <b>violation</b> 36:2 94:21 <b>virtual</b> 7:22 <b>voice</b> 63:18 80:22 81:13,21 82:4,7 95:4 96:15 <b>voices</b> 36:14,15 <b>volunteer</b> 11:1 <b>volunteered</b> 24:22 <b>vote</b> 19:12 24:14
<b>u</b>		<b>v</b>	26:19 27:6 31:1 31:10 34:1,11 34:13,22 35:10 37:8 46:16,19 46:20,22,23 49:15 50:11 51:2 52:18 59:5 60:17,19,21 61:6,10,11,14 61:19,21,22,23 62:5,8,16,19 63:3,19,23 64:1 64:7,10,12,19 65:2,17,22 66:2 66:15 68:8,9,10 68:11,17,20,21 69:6,13 71:16
<b>u</b> 2:12 5:11,19 <b>u.s.</b> 80:17 <b>uh</b> 7:21,21 <b>ultimate</b> 58:9 <b>uncompetitive</b> 24:13		<b>v</b> 1:7,15 2:3 <b>various</b> 11:6 14:7 24:20 38:9 38:9 41:21 49:7 63:17 73:22 74:16 78:7 103:13 <b>vary</b> 48:10 <b>verbs</b> 84:8 <b>versus</b> 84:5,6,11 <b>viable</b> 31:11,11 32:2,13 36:15 36:19 49:20 50:6,9 57:7 75:16 92:19 95:5 100:7	



[vote - witness]

Page 131

71:21 76:16,17 79:4,12 81:7 82:1,2 92:1,15 92:18 94:3,6,21 95:2,7,13 96:21 97:1,3 99:15 100:8 103:5 <b>vote411</b> 54:22 <b>vote411.org</b> 53:16 <b>voted</b> 61:9 62:21 70:4 71:11 78:15,21 79:8,11 96:2 102:22 <b>voter</b> 11:1 14:22 19:17,18 30:22 33:5,10 61:16 62:9 63:9 66:13 67:9,10 77:1,10 79:15,17,23 80:4 89:20 90:8 95:8 <b>voter's</b> 81:13 <b>voters</b> 18:11 19:10 20:7,9,14 20:18,23 21:8 21:12 32:23 33:9,10 37:14 50:10 53:13,15 55:13 60:15 62:13 96:9 102:5 103:6 <b>votes</b> 24:11 26:20 46:20	69:18 70:3 81:14,15 91:17 92:17 93:2,14 102:4 <b>voting</b> 11:8,8 14:9,12,17,18 19:19 27:2,8,13 28:17,23 29:11 30:22,23 31:8 32:18,23 35:6 36:8 48:18 49:7 50:19 51:9 53:9 62:1,20 63:15 69:1 76:14,17 76:19 77:7 78:2 79:9 84:19,20 84:21 88:15 91:3 93:17 94:5 94:5 95:14 96:7 96:15,19 <b>vrr</b> 64:20 <b>w</b> <b>w</b> 2:15,20 5:19 6:8 7:1 <b>waggoner</b> 14:2 14:16 15:2 45:8 45:12,19 46:14 <b>waggoner's</b> 46:1 <b>wait</b> 8:15 <b>waiting</b> 67:22 <b>waived</b> 3:3,19 <b>wake</b> 82:14 <b>walk</b> 87:15	<b>walker</b> 9:12 <b>want</b> 29:1,15 30:15 31:15 37:15 66:16 83:18 87:5 93:9 <b>wanted</b> 70:12 83:20 84:8 86:12 91:19 <b>war</b> 16:7,8 18:21 <b>washington</b> 4:21 5:3 <b>way</b> 36:20 42:3 46:21 52:23 55:2 59:3 71:8 76:13 77:13 80:10 90:14 92:10,19 94:16 104:18 <b>ways</b> 21:7 26:22 30:18 38:17 42:8 43:23 76:12 77:9 84:20 96:8,10 96:13 <b>we've</b> 9:6 30:6,7 30:10 39:23 <b>website</b> 54:4 67:5 <b>week</b> 11:18 26:12 64:23 <b>weekend</b> 77:3 <b>weigh</b> 37:9 <b>weighed</b> 93:2,10 93:15	<b>weight</b> 81:16 94:4 <b>weighted</b> 92:18 94:14 <b>weighting</b> 91:17 94:16 <b>welcome</b> 104:11 104:21 <b>went</b> 37:18 79:10,13 <b>wes</b> 1:8,16 2:4 7:9 <b>west</b> 15:6 16:17 61:12 89:6 <b>whatley</b> 9:14 <b>whichever</b> 71:18 <b>white</b> 41:2 <b>wide</b> 81:10 85:14 <b>william</b> 74:7 <b>win</b> 32:3 36:17 36:18,19 49:10 82:9 95:18 <b>winding</b> 91:10 <b>winning</b> 24:15 <b>wins</b> 51:12 <b>winter</b> 74:7 <b>wish</b> 43:21 <b>witness</b> 3:3 6:8 8:8 40:13 44:6 69:17,21 87:1,5 87:17 104:11,21 105:11
---	---	--	---

[witnesses - zoom]

Page 132

<b>witnesses</b> 11:4 88:9	<b>years</b> 10:23 13:16 15:17
<b>women</b> 18:11,12 19:9,12 20:6,9 20:14,18,19,20 20:23 21:8,12 33:9 37:14 53:13,15 62:12	17:5,10,12 26:2 38:11 44:15,15 51:1 71:11 74:10 75:4,5
<b>women's</b> 18:14	<b>yesterday</b> 66:8 67:4,8 80:12
<b>word</b> 32:17 94:9	<b>young</b> 20:21
<b>words</b> 33:7	<b>z</b>
<b>work</b> 62:14 63:3 63:9 64:16 65:7 65:21 69:3 78:14 88:12 93:9	<b>zip</b> 13:18,19 <b>zoom</b> 2:17 4:23 5:5,9,13,17,21 6:6 8:17 67:4,6 67:8
<b>workday</b> 77:4	
<b>worked</b> 17:19 17:20	
<b>working</b> 78:4	
<b>wrap</b> 51:20	
<b>write</b> 19:3	
<b>writer</b> 74:16	
<b>writing</b> 74:22 81:5	
<b>wrong</b> 79:13	
<b>x</b>	
<b>x</b> 4:1 22:4 80:19	
<b>y</b>	
<b>y'all</b> 86:15 <b>yeah</b> 55:7 87:18 <b>year</b> 12:5 22:21 27:20 63:7 70:10 88:6	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

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

(A) to review the transcript or recording; and

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

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

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

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

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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

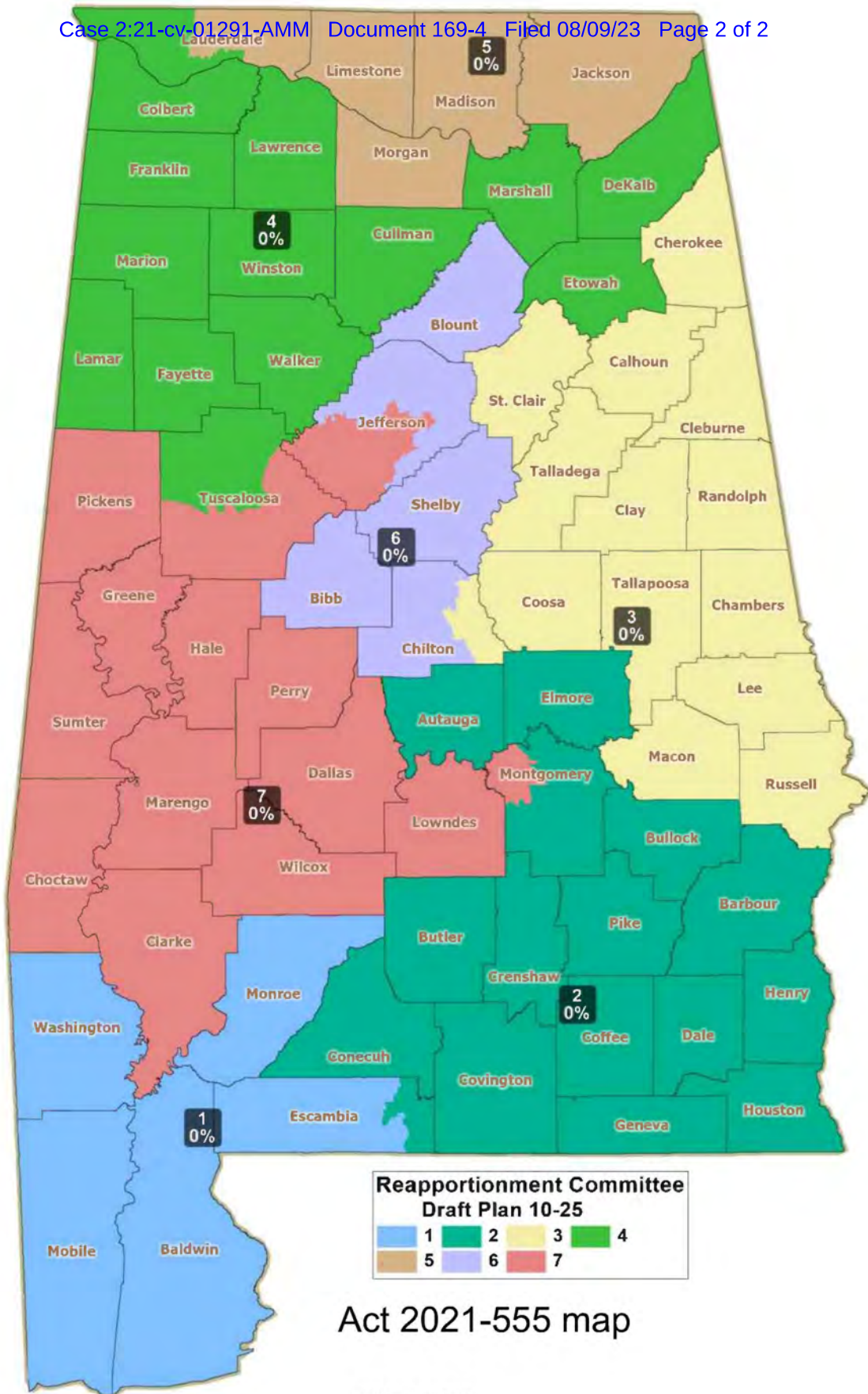
fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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.

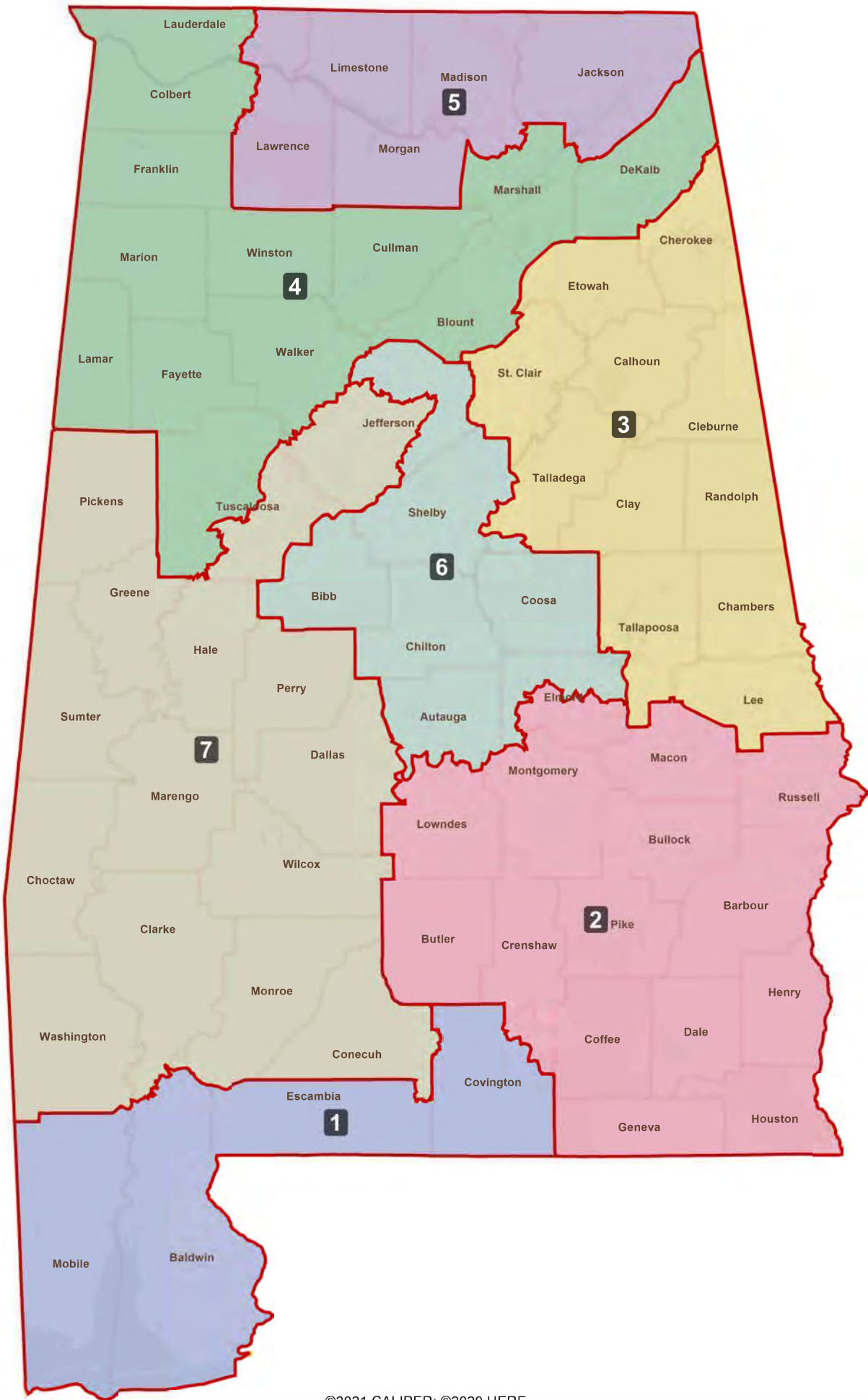
Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).

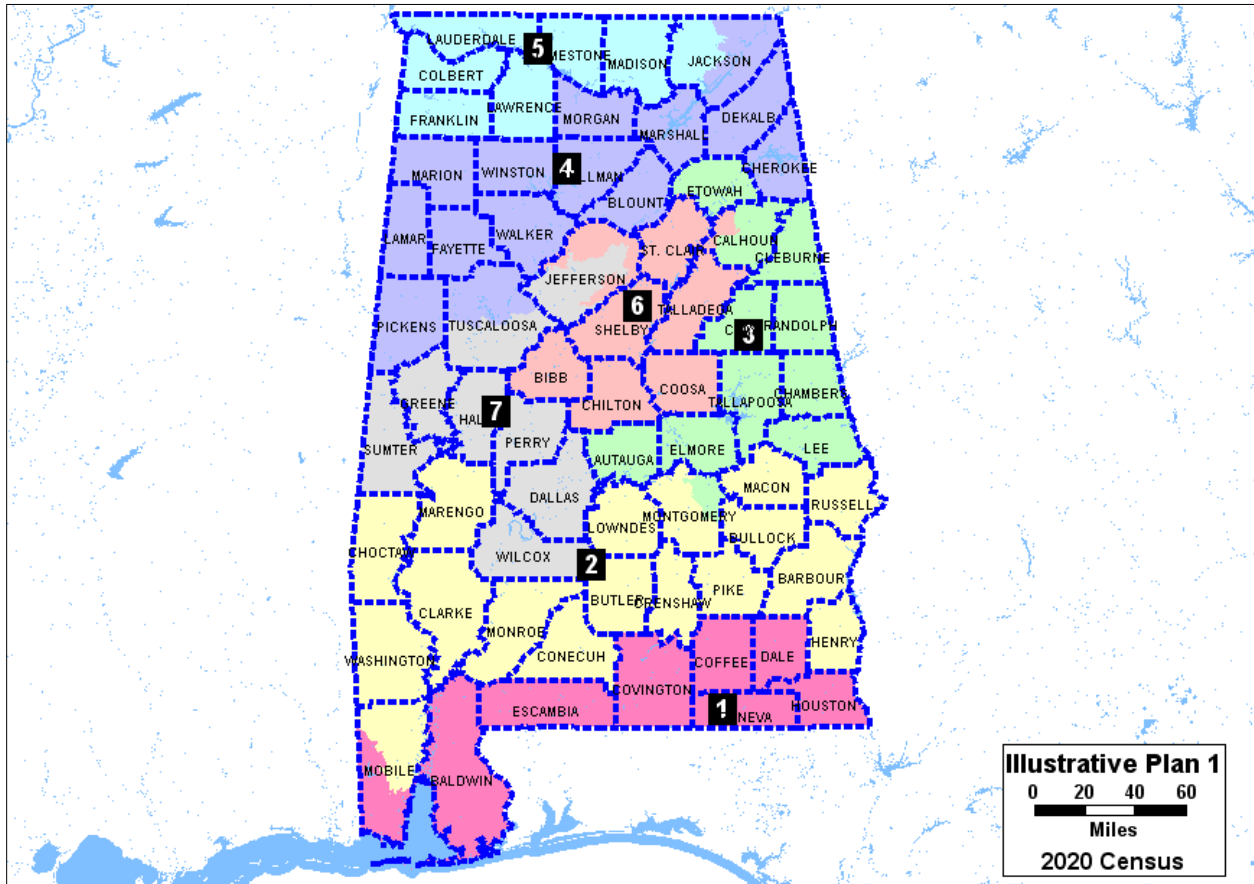


Case 2:21-cv-01291-AMM Document 169-4 Filed 08/09/23 Page 2 of 2



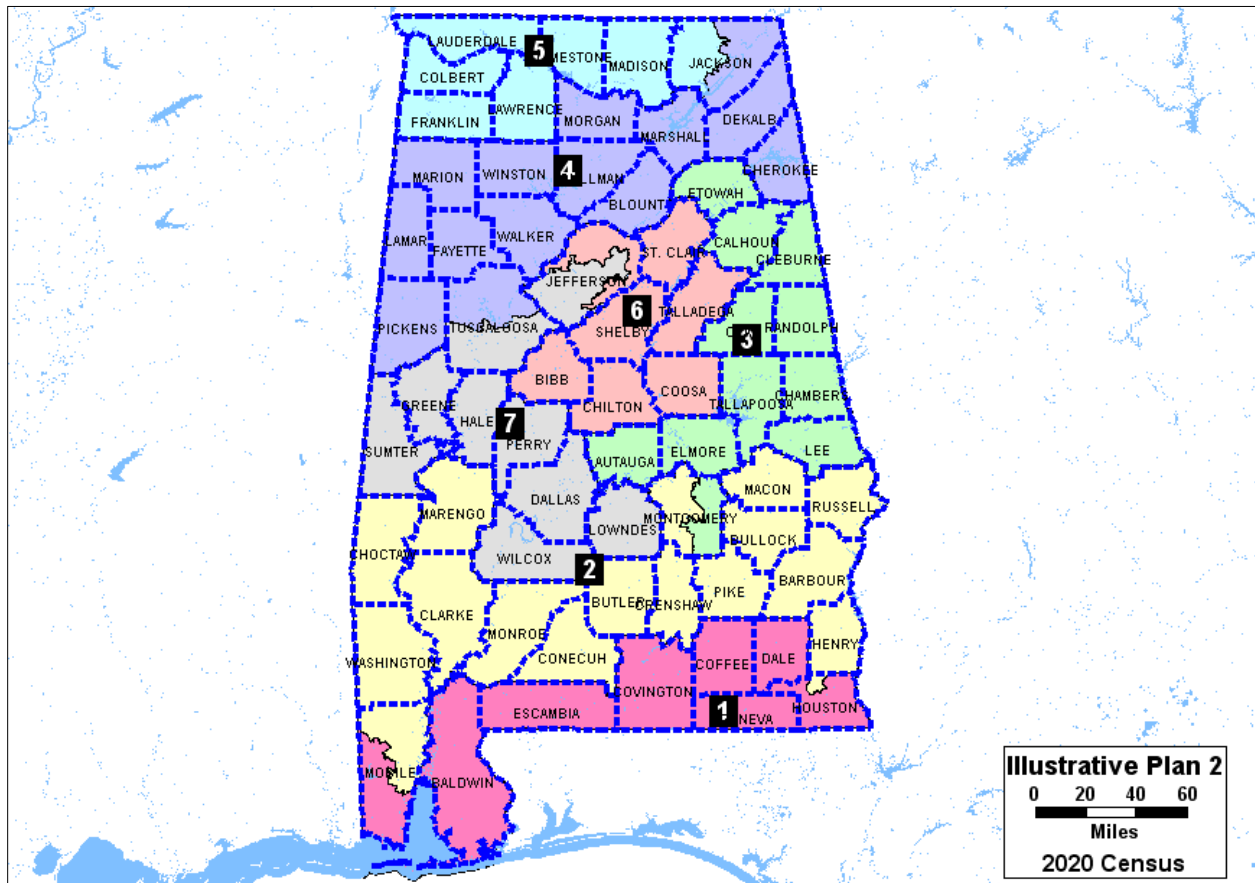
Livingston Congressional Plan 3-2023



**Figure 10****Alabama U.S. House – Illustrative Plan 1**

63. Majority-Black District 2 encompasses part of Mobile County, extends north to include all of Washington and Choctaw Counties, then east through the Black Belt counties. Henry, Barbour, and Russell Counties form the eastern boundary. The northeast part of Montgomery County is merged into District 3.

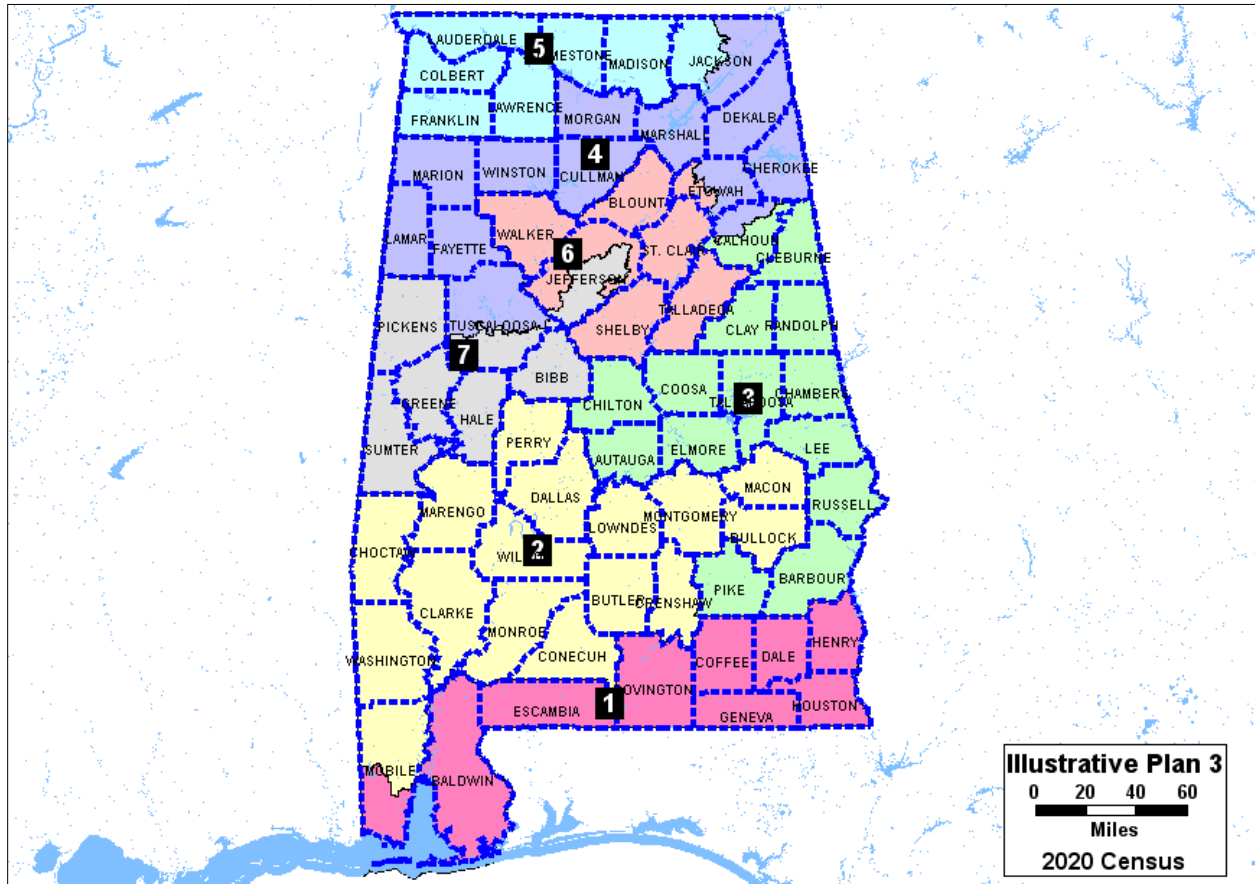
64. Majority-Black District 7 encompasses part of Jefferson and Tuscaloosa Counties as well as Sumter County on the Mississippi state line. Dallas and Wilcox Counties form the eastern border of District 7.

**Figure 12****Alabama U.S. House – Illustrative Plan 2**

68. Under Illustrative Plan 2, District 2 is similar in geographic extent to Illustrative Plan 1. Additional areas of Montgomery County are merged into District 3, allowing parts of Dothan in Henry County to be joined with District 2.

69. The boundary between District 1 and District 2 in and around Dothan generally tracks the boundary between current State Senate Districts 28 and 29. There are no 2020 VTD splits in Henry County under Illustrative Plan 2. (Like



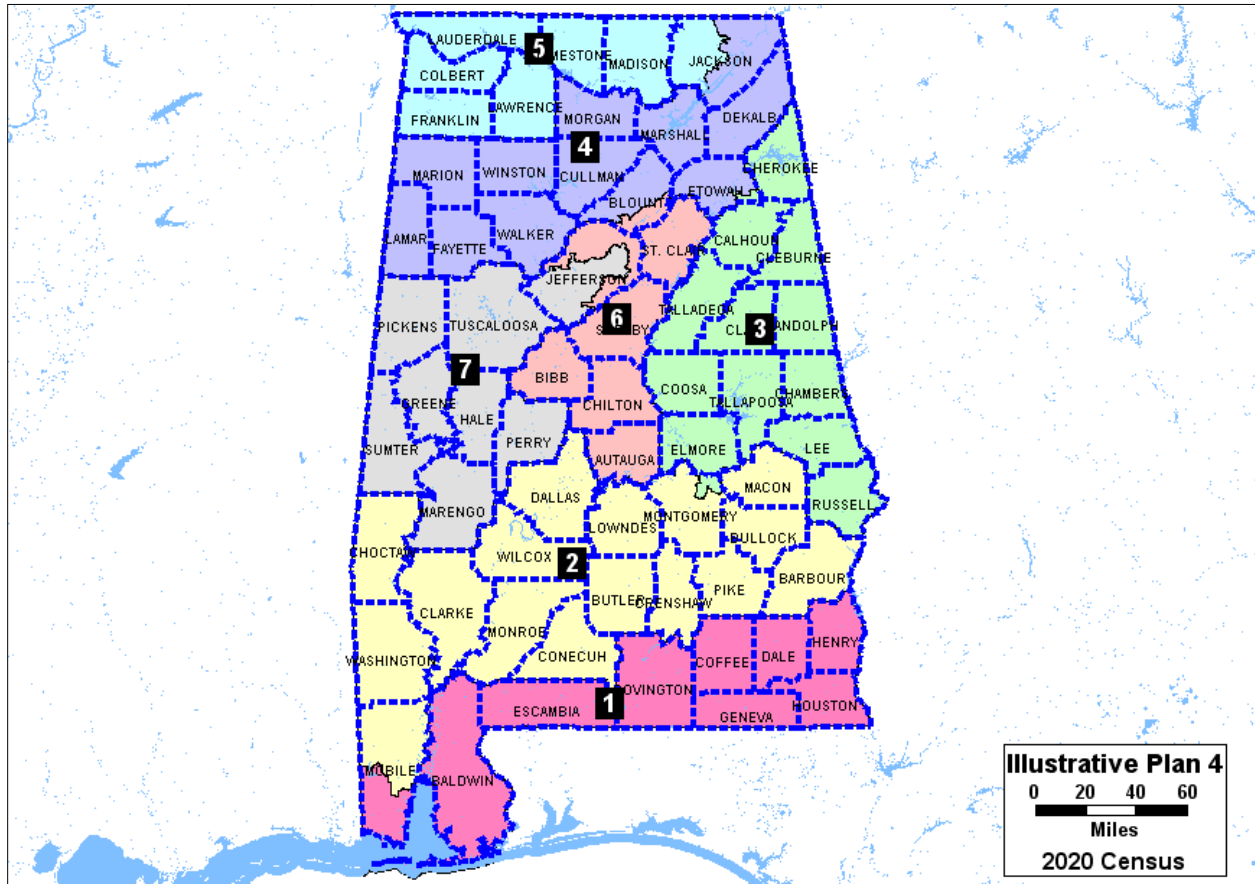
**Figure 14****Alabama U.S. House – Illustrative Plan 3**

75. Majority-Black District 2 encompasses part of Mobile County and extends east to encompass Macon and Bullock Counties.

76. Majority-Black District 7 encompasses part of Jefferson County and extends south to Tuscaloosa County and west to Sumter and Pickens Counties.

77. The table in **Figure 15** shows 2020 summary population statistics for Illustrative Plan 3. **Exhibit I-1** contains detailed 2020 population statistics by district.



**Figure 16****Alabama U.S. House – Illustrative Plan 4**

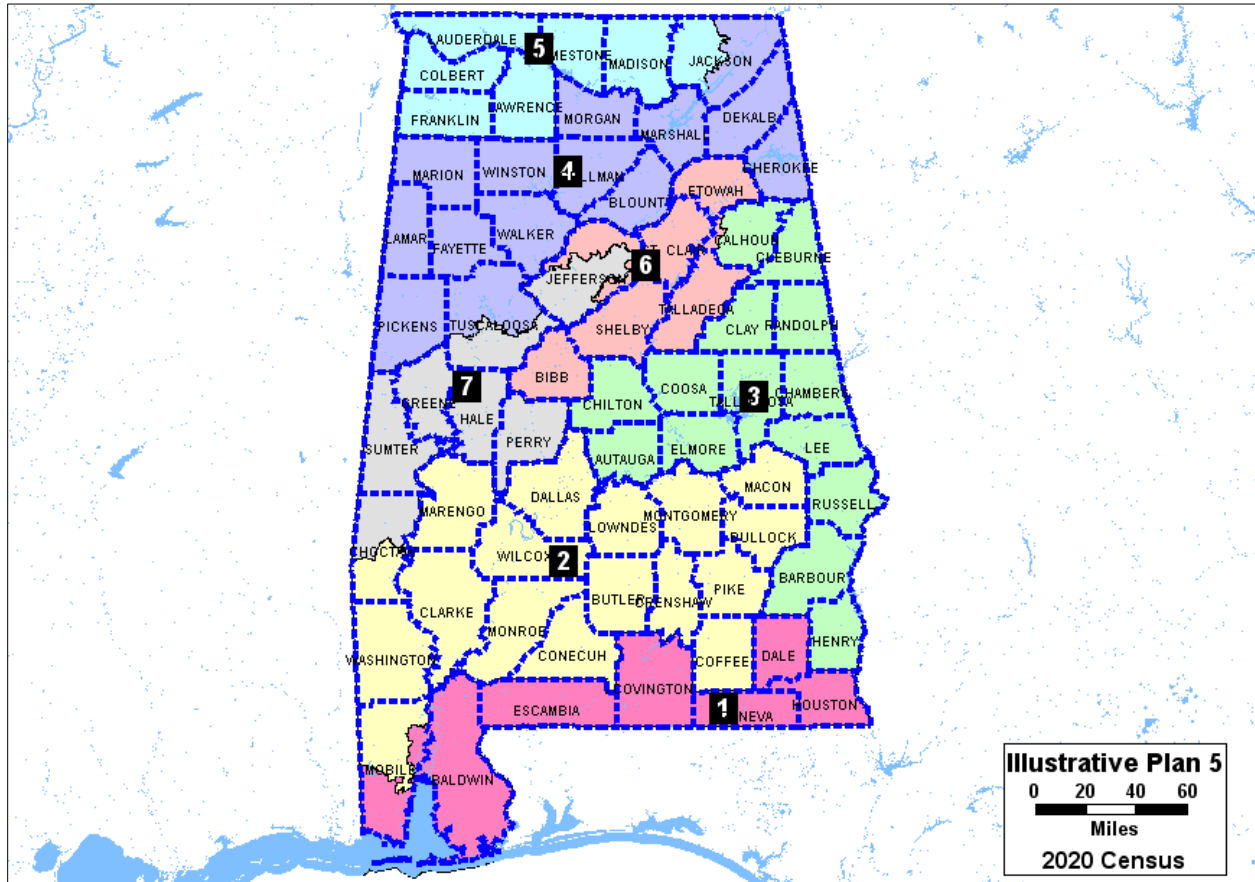
80. Majority-Black District 2 encompasses part of Mobile County, extends north to include all of Choctaw County, and then east to the Georgia state line to include all of Barbour County—part of the historical Black Belt.

81. Majority-Black District 7 encompasses part of Jefferson County and all of Tuscaloosa County and stretches west to the Mississippi state line, with Perry and Marengo Counties forming the eastern border.

85. Illustrative Plan 5 demonstrates that two majority-Black districts can be drawn that would not pair the two current incumbents who currently represent District 1 and District 2.

**Figure 18**

**Alabama U.S. House – Illustrative Plan 5**

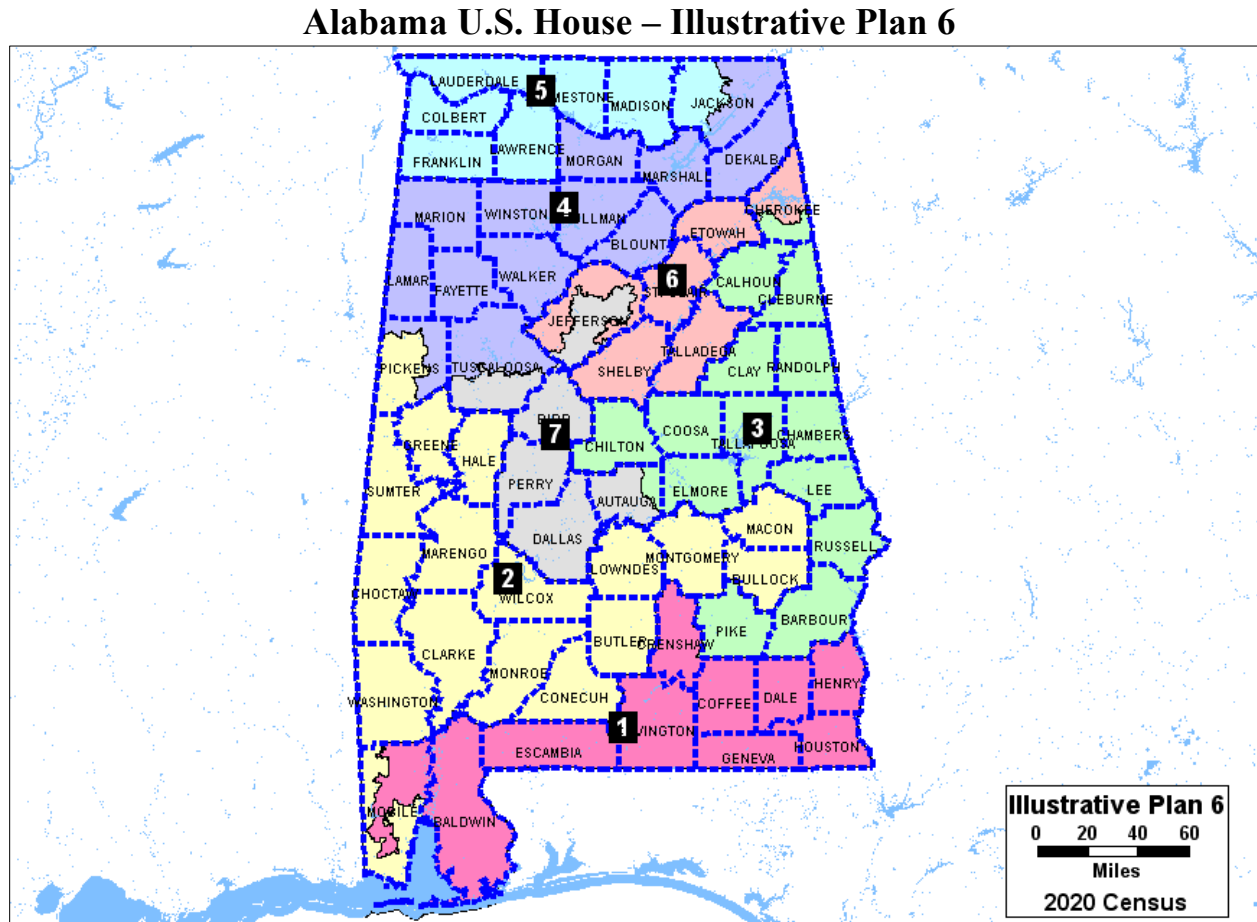


86. Majority-Black District 2 encompasses part of Mobile County, extends north to include all of Washington County and part of Choctaw County, then east through the Black Belt counties. Macon, Bullock, and Pike Counties form the

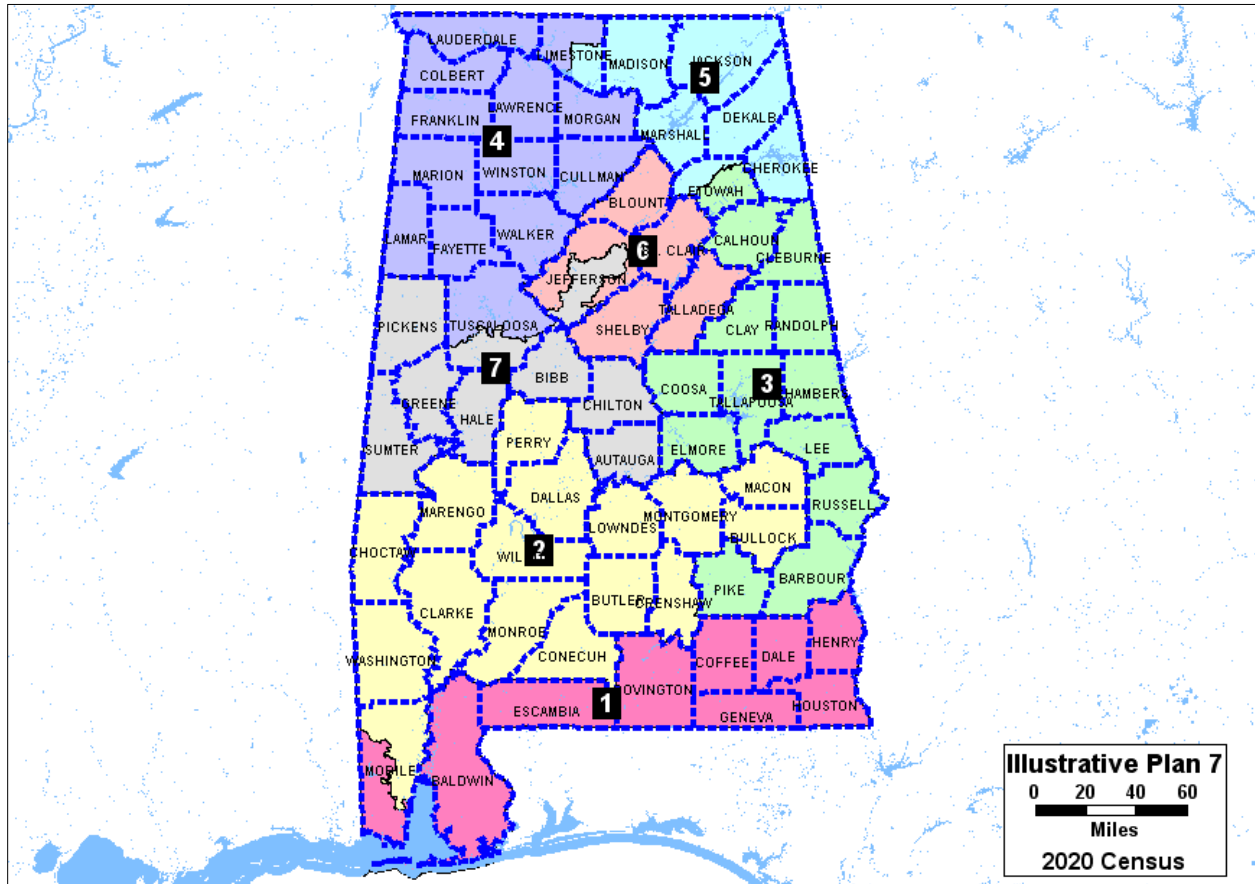
**(f) Illustrative Plan 6**

90. The map in **Figure 20** depicts Illustrative Plan 6. District 2 is 51.28% BVAP and District 7 is 51.09% BVAP.

### Figure 20

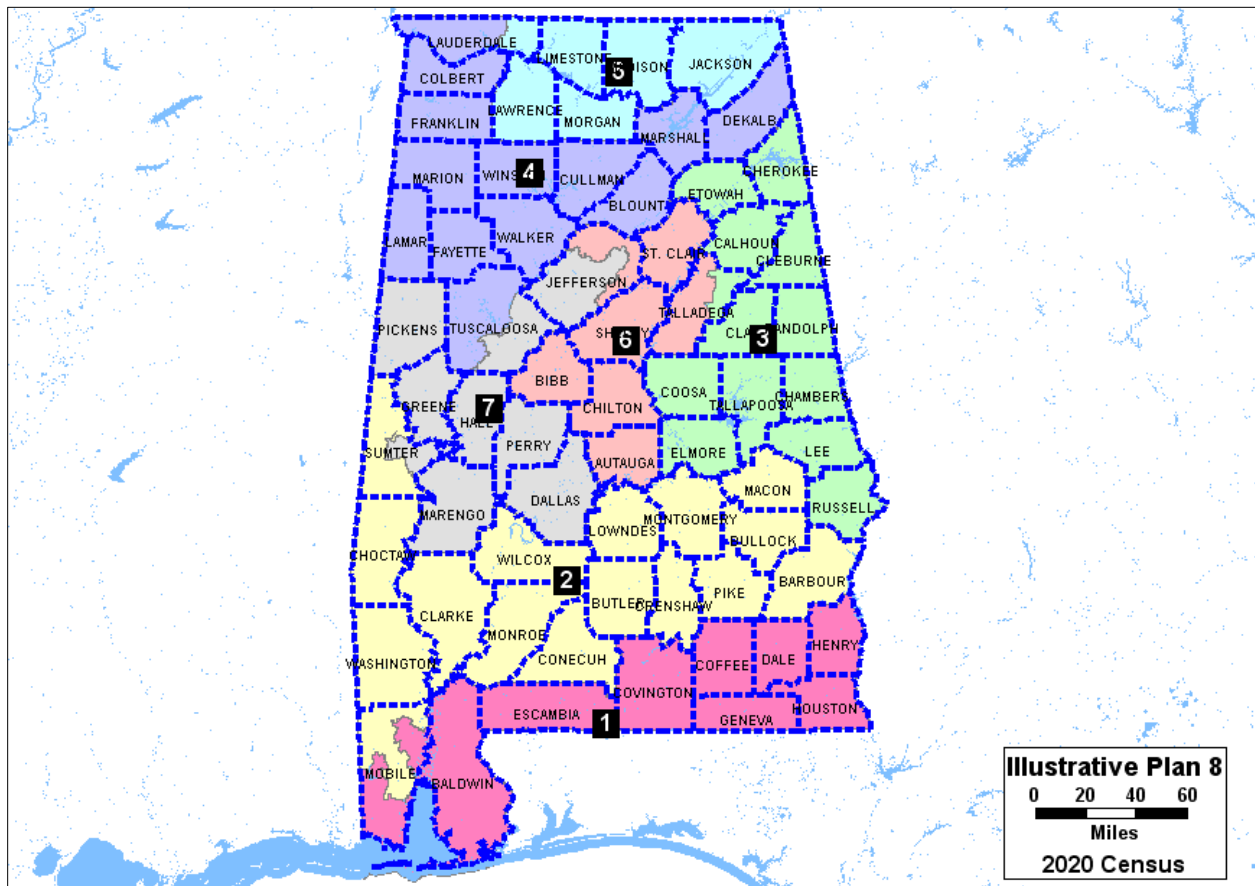


91. Illustrative Plan 6 demonstrates that it is possible to create a second majority-Black district while keeping all of the population in the Cities of Mobile and Montgomery, as well as Montgomery County, together in District 2.

**Figure 22****Alabama U.S. House – Illustrative Plan 7**

98. As in Illustrative Plan 6, majority-Black District 2 is drawn so that both the City of Mobile and the City of Montgomery (and Montgomery County) are entirely in District 2.

99. As shown in **Exhibit M-4**, Illustrative Plan 7 splits five counties and populated areas in 28 VTDs. However, ten of the 28 VTD splits are created because the plan generally follows the city limits of the City of Mobile (rather than VTDs)

**Figure 24****Illustrative Plan 8 – 2020 Census**

106. Majority-Black District 2 extends north from Mobile County to share Sumter County with District 7, then southeast through the Black Belt to Barbour County and the Georgia line. District 7 encompasses most of the land area in Jefferson County, extending south to include part of Tuscaloosa County and on to Dallas County then west to Marengo County and north to include Pickens County on the Mississippi line.



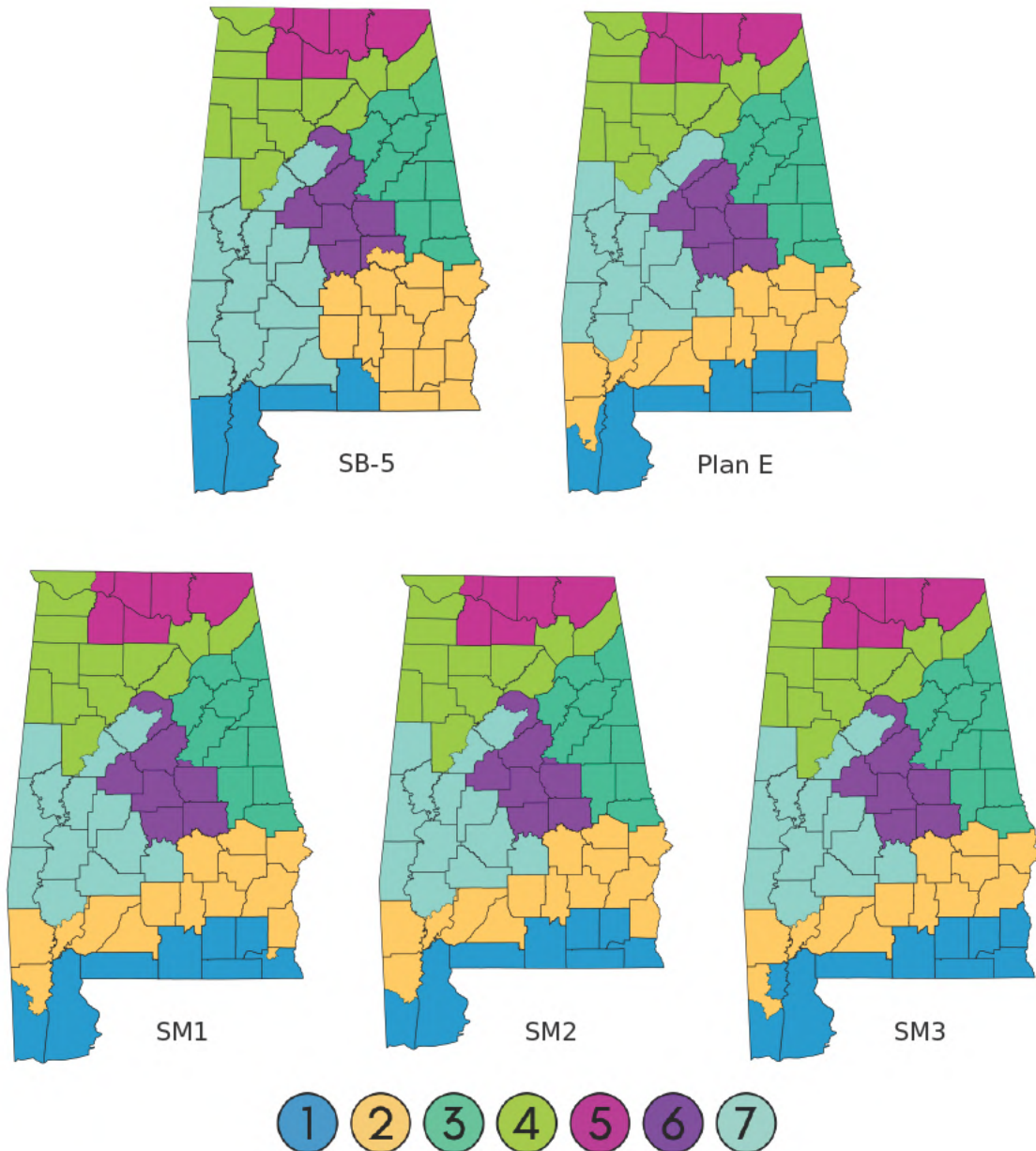


Figure 1: Districts 3, 4, 5, and 6 are substantially similar across all five plans. The main differences occur in districts 1, 2, and 7. All three Special Master plans handle the CD1-CD2 boundary slightly differently; the third Special Master plan also modifies the CD6-CD7 boundary in Jefferson County. Plan E has substantially the same district cores as the Special Master plans, but makes small adjustments throughout.

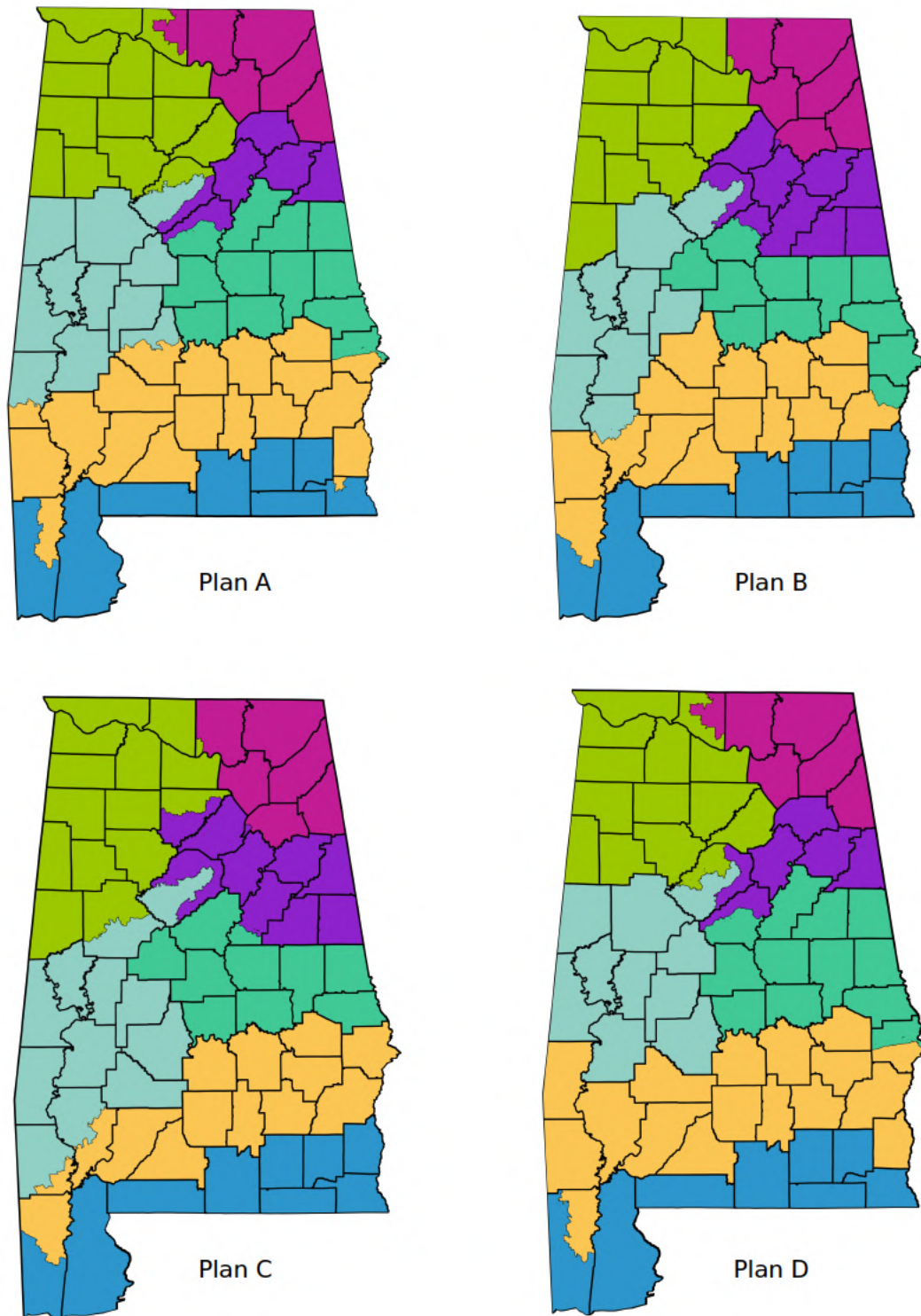
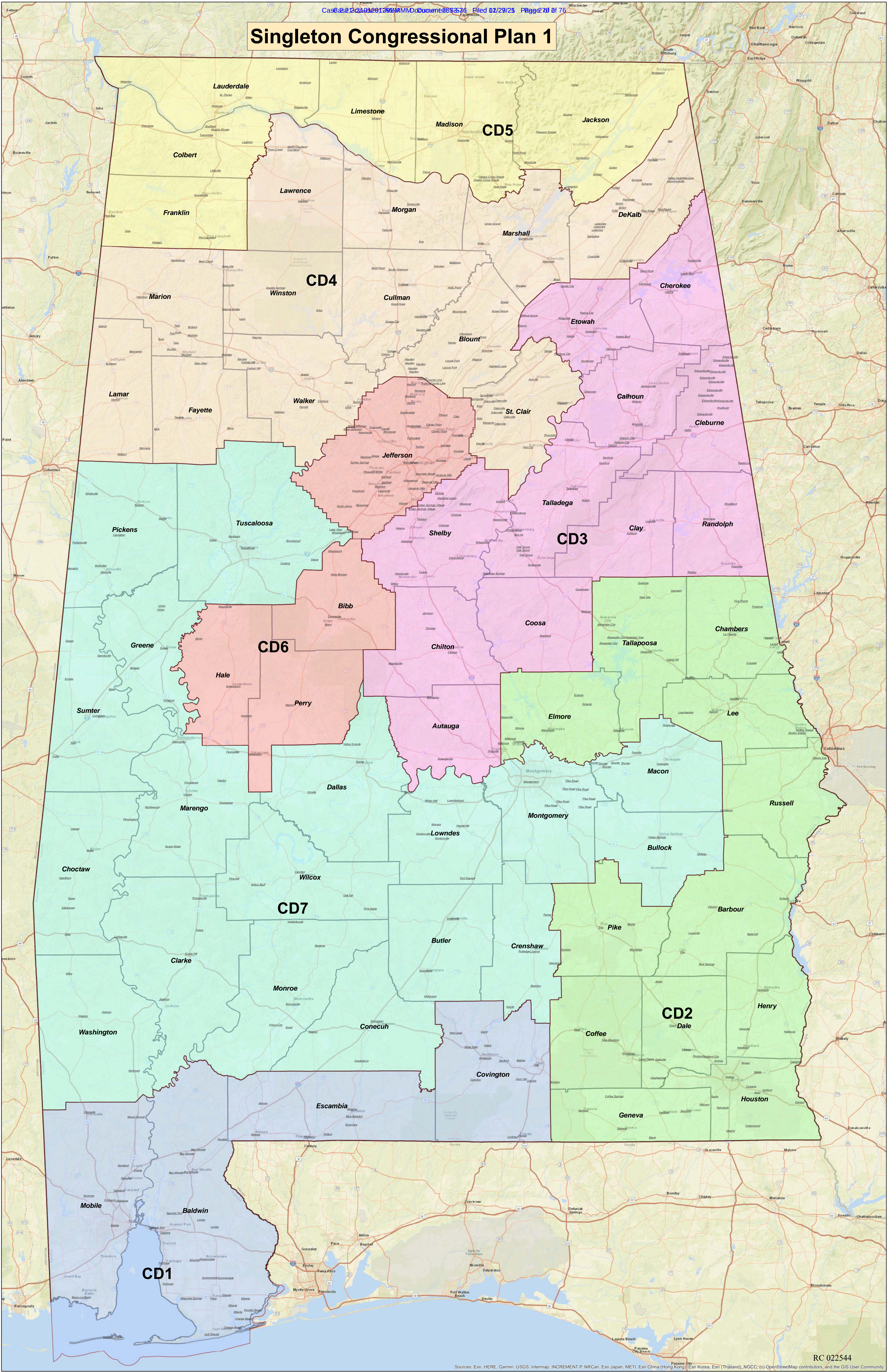


Figure 2: The four alternative plans presented in this report.

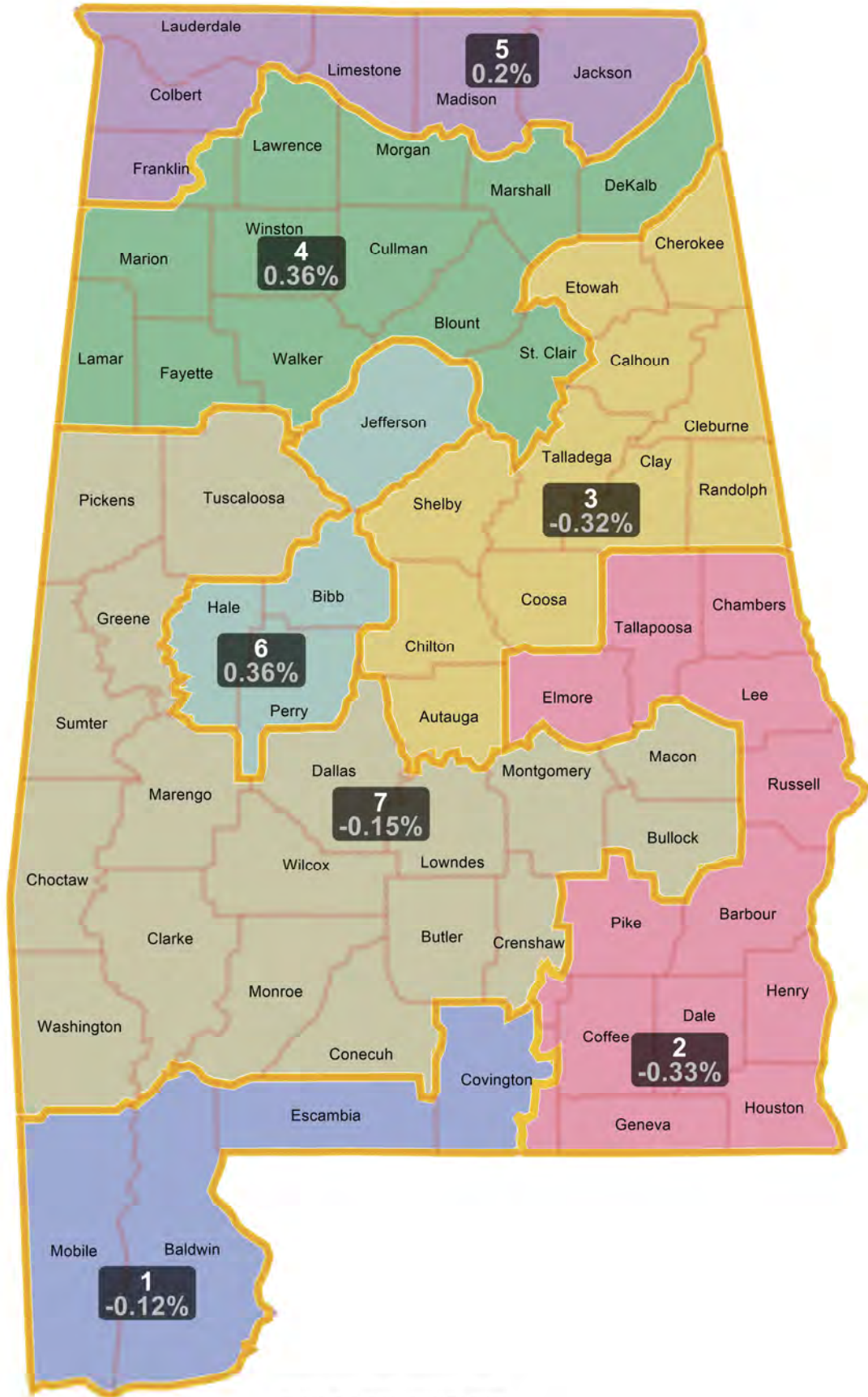


# Singleton Congressional Plan 1

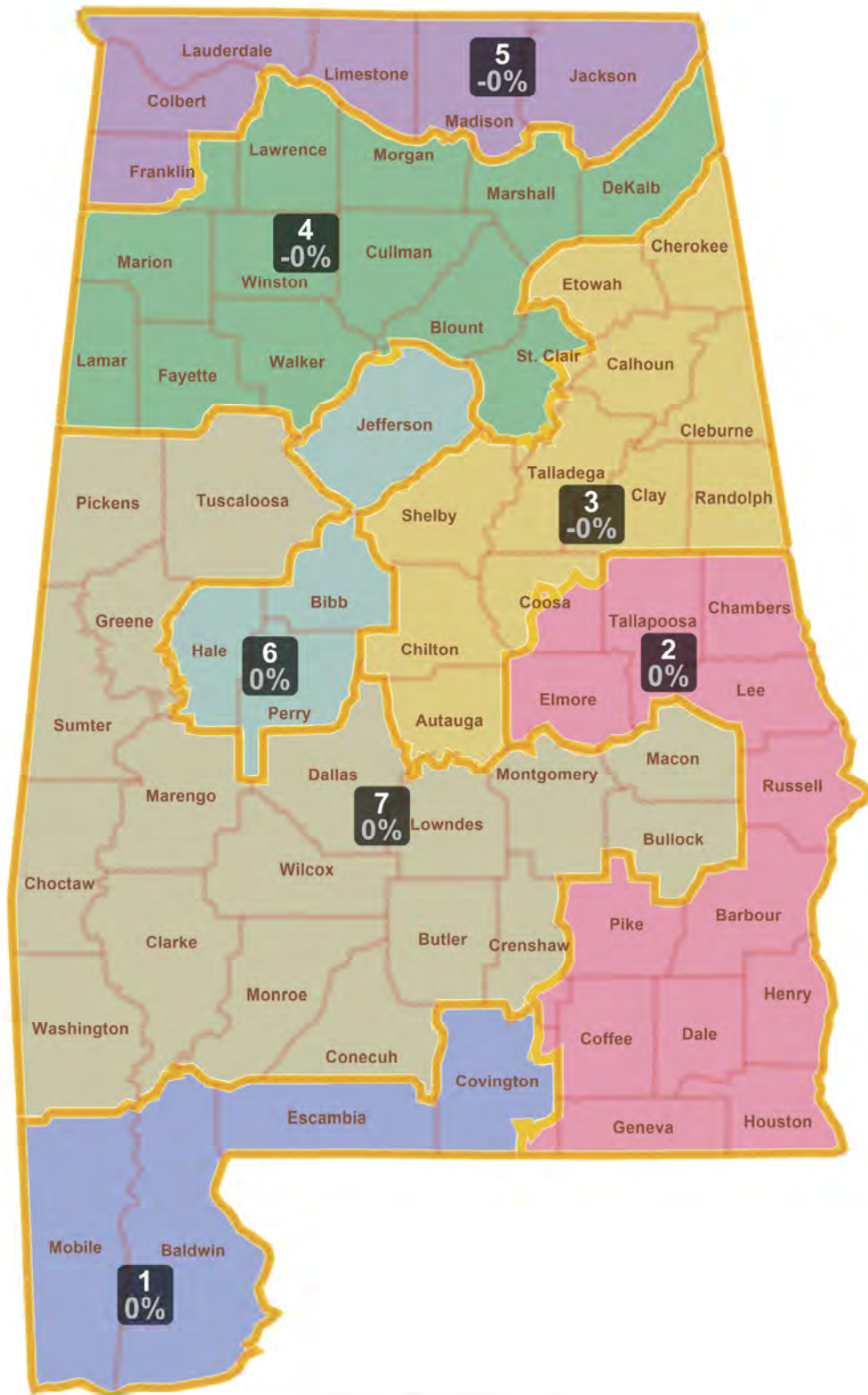




**Singleton Congressional Plan 2**  
**\*\*Narrow Deviation**



**Singleton Congressional Plan 3**  
**\*\*zero deviation**





Straight Ticket Voting Allowed in only 7 states: AL, IN, KY, MI, OK, SC, Nevada  
 13 states have repealed STV since 2006.  
 GA repealed back in 1994, SD 1996, IL 1997  
 In the 2020 election, 2/3 of AL voters voted ST.

Dr. R. Volney Riser

Prof. Riser doc #17

"Brennan recognized that Blacks could have no influence or voice in elections absent interracial coalition building."

Ranked choice voting gives voters more choices and more choices = less polarizing candidates > opposed by leaders of both parties - fear that more moderate officeholders of both parties could be elected.  
 Rick Hasen - UCLA prof of law & pol. sci.

District 7 contains 54% of JeffCO pop but > 71% of its Black pop.

TUSE pop ~ 237,000 as of 2022  
 JeffCO ~ 665,400 " 2022

NOTE BOOK

SBI

only affects

application - original bill

26 Pros

covered the ballot itself

8 cons

Democrats

Disabled people

LUVAL held a

gave powerful

(76 GOP)

press conference

testimonies

75 pros

28 Democrats cons

Crimes of Moral Turpitude

threats against election

Holcomb - included

attempts

> each a

orig. instigating joining gangs

conspiring

separate  
felony

Added 143 felonies

to the 41

~ 4X

aggravating stalking

elder abuse

domestic violence

conspire

solicitation to commit a felony

crime of moral turpitude

1 crime becomes

only People who earlier got to vote will not now

Prison Policy Initiative

AL Locks up 990/100,000 > any democratic country

Black % in AL = 27% but as of 12/2023 they are

52.7% of AL prison pop.



Does not include white collar like  
 HB 1 Felony Voter Disq. Act <sup>embezzlement</sup> or fraud  
Added crime committed against an election  
official motivated by that position is now  
 a crime of moral turpitude min 3 mos  
 up to 15 yrs.

- \* - compelling street gang membership
- aggravated stalking
- dom violence
- elder abuse

Also

attempts / conspiracy / solicitation  
 is equal to the crime itself

Effective Oct 1, 2024 → which  
 disqualifies additional people from  
 voting in the Nov 2024 election  
 But violates law that requires 6 mos between  
 election & any charges that effects bryan.lange7@gmail.com  
 that election.  
 Previously  
 treason / murder / terrorism / human trafficking /  
 sexual abuse of a child

328,000 AL w/ felony

200,000 w/out disq.

130,000 elig. for CERV

15-16% of AA pop disenfranchised

Places B  
 felony  
 SB1

up to 20 yrs in prison

Illegal to pay or be paid by a 3rd party org. to pre-fill/collect absentee ballot applications

Does not allow GOTV orgs to assist. NAACP and LWV AL have suspended absentee ballot assistance efforts.

LWV AL, NAACP, GBMD, and AL Disabilities Rights Coalition have sued to block HB1 as violations of the VRA, Help America Vote Act of 2002, and the 1st/14th Amendments.

AL one of only 4 states w/out early in-prison voting. One of 14 that requires an excuse to vote absentee w/out a broad right to vote absentee for those over 65 or those w/ disabilities. If a voter does qualify AL does not provide env. or prepaid postage. No Braille or other languages.

In 2021 AL outlawed curbside voting even for those w/ disabilities.

In 2022 primaries < 25000 absentee ballots were cast.