UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CASE NUMBER: 1:21-CV-05337-SCJ

ALPHA PHI ALPHA FRATERNITY INC., a nonprofit organization on behalf of members residing in Georgia; SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL CHURCH, a Georgia Nonprofit organization; ERIC T. WOODS; KATIE BAILEY GLENN; PHIL BROWN; JANICE STEWART, PLAINTIFFS,

V.

BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia, DEFENDANT.

DEPOSITION TESTIMONY OF:
Phil Brown
December 15, 2022

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

IT IS STIPULATED AND AGREED by and between the parties through their respective counsel that the deposition of Phil Brown may be taken before Mallory B. Gray, CCR, RPR, a Court Reporter and Notary Public for the State at Large, via Zoom, on the 15th of December 2022, commencing at approximately 8:30 a.m.

IT IS FURTHER STIPULATED AND AGREED that the signature to and the reading of the deposition by the witness is not waived.

In accordance with Rule 5(d) of the Alabama Rules of Civil Procedure, as amended, effective May 15, 1998, I, Mallory B. Gray, am hereby delivering to Dan Weigel, the original transcript of the oral testimony taken the 15th of December 2022, along with the exhibit.

Please be advised that this is the same and not retained by the Court Reporter, nor filed with the Court.

I N D E X

EXAMINATION BY:	PAGE NO.
Mr. Weigel	6
Mr. Garabadu	69
Mr. Weigel	71

E X H I B I T S

FOR THE DEFENDANT:		PAGE NO.
Exhibit 1	Notice of Deposition	11
Exhibit 2	Amended Complaint	47

(Exhibits not received at transcript production)

A P P E A R A N C E S

FOR THE PLAINTIFFS:
BY: Jennesa Calvo-Friedman
Caitlyn May
Rahul Garabadu
WilmerHale
1875 Pennsylvania Ave NW
Washington, DC 20001

FOR THE DEFENDANT:
BY: Dan Weigel
Taylor, English, Duma, LLP
1600 Parkwood Circle SE
Suite 200
Atlanta, Georgia 30339

I, Mallory Bradberry Gray, a Court Reporter and Notary Public, State of Alabama at Large, acting as Commissioner, certify that on this date, pursuant to the Alabama Rules of Civil Procedure and the foregoing stipulation of counsel, there came before me via Zoom, commencing at approximately 8:30 a.m. On the 15th of December 2022, Phil Brown, witness in the above cause, for oral examination, whereupon the following proceedings were had:

(Witness sworn.)

MR. WEIGEL: This will be the deposition of Phil Brown taken by Defendant Secretary of State Brad Raffensperger for the purpose of discovery and all purposes allowed under the Federal Rules of Civil Procedure.

All objections except those going to the form of the question and the response of it -- responsiveness of the answer are reserved until trial or the first use of the

deposition.

Are those stipulations agreeable to you, Counsel?

MR. GARABADU: Yes, they are.

MR. WEIGEL: And how do you wish to handle signature?

MR. GARABADU: We can do it electronically.

MR. WEIGEL: Do you want to reserve it, though?

MR. GARABADU: We'll reserve it, yes.

MR. WEIGEL: Okay. Sounds great. And the witness has already been sworn in.

PHIL S. BROWN

was sworn (affirmed) and testified as follows:

EXAMINATION

BY MR. WEIGEL:

Q. Sir, my name is Dan Weigel for the law firm Taylor English Duma. I'm appearing on behalf of the Defendant in this matter.

MR. WEIGEL: And, Mr. Brown's

counsel, if you would like to make your appearance for the record.

MR. GARABADU: Yes. My name --

(Discussion held off the record.)

MR. GARABADU: My name is Rahul Garabadu, and I represent the Alpha Phi Alpha Plaintiffs, including Mr. Phil Brown here with us today.

MR. WEIGEL: And if anyone else on the call needs to make their appearance of record as well.

MS. CALVO-FRIEDMAN: My name is Jennesa Calvo-Friedman. I am also representing the Alpha Phi Alpha.

MS. MAY: Hi, my name is Caitlyn May. I'm -- sorry.

MR. WEIGEL: Sorry about that.

MS. MAY: My name is Caitlyn May, and I'm also representing the Alpha Phi Alpha Plaintiffs.

MS. TSAI: And my name is Denise Tsai from WilmerHale, and I'm here on behalf of Alpha Phi Alpha Plaintiffs.

Q. (By Mr. Weigel) Awesome. I think that covers everyone.

So, Mr. Brown, so I'm going to ask you a series of questions. If at any time during the deposition you do not understand my question or if you're not sure you've heard me, then please let me know if you don't -- because if you don't say anything, I'm going to presume you've heard the question and understand it.

The purpose of this deposition is not to confuse you. Again, if I phrase anything poorly or you don't understand any aspect of the question, ask for any clarification at all, and I will provide that.

And since this is a virtual deposition, as you've already noticed, there will likely be some audio or visual issues we may encounter. So for the court reporter especially, it's going to be especially important that we do a couple of things.

First, do your best to speak clearly

and loudly so that the court reporter can hear you.

Second, especially for yes or for no answers where your instinct may be to nod or give a uh-huh, be sure to say yes or no audibly.

And finally, we have to both do our best to not speak over each other or cut one another off. So even if you know the answer before I finish the question, make sure you wait until I complete my question before you answer. I will likewise do my best to wait to ask the next question until you've completed your answer.

Similarly, if I ask a question and your attorney has an objection, make sure you stop any answer that you're providing and let your attorney make that objection on the record.

Mr. Brown, is that agreeable?

A. Yes.

Q. And if you need to take a break at any time, please just let me know. The only

thing that I ask is that if you would like to take a break, if I've already asked a question and that question has been posed, please complete your answer before requesting that we take a break.

And finally, with this being, again, a virtual deposition, it is important that we confirm that you don't have any electronic devices out and open for you to see during the deposition. This is going to include your cell phone, so please make sure you have that off or silenced, as well as the e-mail on your computer or laptop.

Of course, you will obviously need to look at the computer screen because this is a virtual deposition, and also you will need to look at the screen for any exhibits that I may have and share for you to look at.

But, again, if you could go ahead and confirm and agree anything of that nature that I described regarding the cell phone or e-mail, text messaging, or any social media, if you could confirm that you do not have

that open and will not have that open for the deposition, that would be great.

A. I don't.

Q. Thank you.

MR. GARABADU: And, Mr. Weigel, sorry to interrupt you, but I just wanted to say I do have my laptop open. It's not visible to Mr. Brown, but if you'd prefer that I close it, that's fine too. But I just wanted to let you know.

MR. WEIGEL: No, that's fine. And even just having you in the room with him to confirm that, that's certainly fine for the record.

(Whereupon, Defendant's Exhibit No. 1 was marked for identification.)

Q. (By Mr. Weigel) All right. So if we're ready to get going, we can.

Mr. Brown, I'm going to start off, if I can do so correctly, by sharing my screen and bringing up what is -- what will be marked as Defendant's Exhibit 1 and if you can see that.

Is it showing up on your screen?
A. Yes.
Q. Perfect. And I will do my best to see if I can -- do you see it as I'm scrolling through it, Mr. Brown, the document that's on the screen?
A. (No response.)
Q. Mr. Brown, did you see me scroll through that entire document?
A. Yes.
Q. And I will now stop sharing my screen.
Mr. Brown, did you recognize that document that I shared with you?
A. No.
Q. Do you know that a Notice of Deposition had been issued to either you or your attorney regarding this deposition, regarding the date and time of the deposition?
A. Yes.
Q. And do you understand that that -- that document was reflected in the exhibit

that I shared?
A. Yes.
Q. Okay. Thank you.
And, Mr. Brown, moving on, we're going to start your testimony by just asking a few questions.
First, have you ever given any testimony prior to this, whether at deposition or in a trial, in a lawsuit similar?
A. Yes.
Q. And how many times was that?
A. Once.
Q. Once before?
A. (Witness nods head.)
Q. And when was that?
A. I don't remember the exact time, but it's been 30, 35 years ago.
Q. And do you recall the nature of the case that you provided testimony in?
A. Yes.
Q. And what was that?
A. A lawsuit was filed to elect our

county official by district instead of at large.

Q. And do you recall if that case went to trial?

A. I don't know how it was settled.

Q. And I know it was a while ago, but do you remember the name of the case?

A. No.

Q. And you mentioned the nature of that case.

Did it deal with the districting of a county? Is that correct?

A. Yes.

Q. And was that in Georgia?

A. Yes.

Q. Do you recall the county?

A. Jefferson County.

Q. Okay. Thank you.

And then just to quickly confirm, have you taken any medications that would keep you from fully and truthfully participating in today's deposition?

A. No.

Q. And do you have any medical conditions that would keep you fully and truthfully participating in today's deposition?

A. No.

Q. All right. Now we're going to shift gears a little bit. It looks like we already covered the next area that I would get into, which is whether you -- well, I guess I have not, so strike that real fast.

Aside from -- for the case that you mentioned earlier where you were a witness, were you a plaintiff in that election case?

A. Yes.

Q. And do you recall how many other plaintiffs there were?

A. No, it became a class action suit.

Q. And just to confirm, you do not recall if it went to trial or not, correct?

A. That's correct.

Q. Do you recall how it was resolved, though?

A. Yes.

Q. And how was that?
A. We now elect county commission school board by districts.
Q. So is it safe to say that that case achieved the outcome that you were hoping to get when you filed the lawsuit?
A. Yes.
Q. And do you recall if the lawsuit was filed in state court or federal court?
A. I don't recall.
Q. And apart from you, have any district family members filed lawsuits in any election-related matters?
A. Not to my knowledge.
Q. Moving on a little bit, Mr. Brown, have you ever been charged with a crime?
A. Yes.
Q. How many times?
A. Once.
Q. And what was that for?
A. DUI.
Q. And aside from that instance, have you ever been arrested?

A. I don't recall.
Q. And for that DUI, did you end up with a conviction?
A. Yes.
Q. And aside from that, have you ever been convicted in any other instance?
A. No.
Q. Shifting to this case, Mr. Brown, have you discussed this case with anyone other than your lawyer?
A. No.
Q. And have you discussed this deposition with anyone other than your lawyer?
A. No.
Q. And have you reviewed anything to prepare for your deposition?
A. Yes.
Q. And what did you review?
A. The statement I made when joining the lawsuit.
Q. And did reviewing that statement help refresh your recollection as to the

events you will testify to today?
A. No.
Q. Let me ask that a different way.
Did reviewing that document help you better prepare and understand what -- the types of testimony that you would be providing to in connection with the case?
A. No.
Q. And do you have any documents or notes with you today?
A. No.
Q. Shifting gears again, Mr. Brown, could you please just once more state your full name for the record.
A. Phil Stanley Brown.
Q. Mr. Brown, what is your current address?
A. [redacted] Wrens, Georgia.
Q. What county is that in?
A. Jefferson.
COURT REPORTER: I'm sorry, sir. Could you repeat that, please?

THE WITNESS: Jefferson.
COURT REPORTER: Thank you.
Q. (By Mr. Weigel) Mr. Brown, how long have you lived at that address?
A. Seventy-one years; almost 71.
No. Correction. I've lived at that address since 1999.
Q. And, Mr. Brown, have you lived anywhere else in the past two years?
A. No.
Q. And during that time, since 1999, have you lived at any other addresses?
A. No.
Q. And you mentioned 71 years when I first asked you.
Is it fair to say that you've lived in Georgia for that long of a period of time?
A. Yes.
Q. And then did you live near that address during that whole time?
A. I lived all my life in and around Wrens, where I live now.
Q. And do you recall the address that

you moved from when you moved to your current address in 1999?

A. Yes.

Q. And what was that?

A. [redacted], Wrens, Georgia.

Q. Thank you.

And since this deposition is occurring virtually, can you provide the address that you are currently testifying from?

A. I really don't know the address, but it's Hyatt Place, in Augusta.

Q. Is it at your lawyer's office?

A. No.

Q. Do you know where it is?

A. It's a hotel.

Q. Okay. Name of the hotel?

A. Hyatt Place.

Q. And aside from your lawyer, is anyone else presently in the room with you?

A. No.

Q. And shifting back to properties, do you own, either partially full, anything

else -- strike that.

Do you own either partially or full ownership in any properties?

A. We do have a family house.

Q. And is that your current -- your current address that you listed earlier or does it have a different address?

A. Different address.

Q. And what is that?

A. [redacted] Wrens, Georgia.

Q. And since 1999, have you owned either partially or fully any other properties?

A. No.

Q. So just the two that we've identified and discussed?

A. Yes.

Q. And we're going to shift gears again, Mr. Brown, and talk a little bit about your past education.

What was the highest level of education that you've completed?

A. Some technical school.

Q. And do you recall the dates that you completed that?
A. No.
Q. Could you estimate how long ago it was?
A. It was in 1971.
Q. And prior to that, did you complete high school?
A. Yes.
Q. And could you give an approximate date of when you completed high school?
A. Graduated high school in 1971.
Q. Where was that high school located?
A. Wrens High School, in Wrens, Georgia.
Q. So is it pretty fair to say that you've lived in and around Wrens, Georgia your entire life?
A. Yes.
Q. And, Mr. Brown, do you have any professional licenses?
A. No.
Q. How about professional

certifications?
A. No.
Q. You mentioned that technical training that you've had.
Do you recall the type of education and training you had in that area?
A. Yes.
Q. And what was that?
A. Airline personnel training.
Q. And since that time in 1971, have you received any training or education in that area?
A. No.
Q. And moving on to organizations that you're currently involved in, are you currently a member of any social organizations?
A. Not really.
Q. When you say "not really," what do you mean by that?
A. I'm not sure what you mean "social."
Q. So I'll try to better clarify that question.

Are you involved in any groups, any organizations where you regularly meet?
A. Yes.
Q. And what would those be?
A. Prince Hall Masons, NAACP, and Democratic Committee of Jefferson County.
Q. Let's go through those one by one real fast.
So with the first one, the Prince Hall one, what's your involvement in that organization?
A. It's a fraternal organization, and I'm a member.
Q. And what types of things does that organization do?
A. They do charity donations and community service.
Q. And how would you describe your level of involvement? Is it once a week? Once a month?
A. Twice a month.
Q. Twice a month.
Do you have any leadership roles in

that organization or are you just a member?
A. I'm a past master.
Q. You said past master?
A. Yes.
Q. And what are your responsibilities with that role?
A. Just advisory.
Q. And the next organization, that was the NAACP, right?
A. Yes.
Q. And same question as before, you know, how often -- what is your level of involvement with that organization?
A. I'm a past president and current treasurer.
Q. And, again, same question, what is -- oh, sorry about that -- what is your -- what are your responsibilities with that role with them?
A. I'm tasked with maintaining the finances of the organization.
Q. And shifting along to the last one you mentioned, that was the Democratic

Committee of Jefferson? Is that what you said?

A. Yes.

Q. And, again, same question, how would you describe your level of involvement with that organization?

A. I'm vice chair, but we don't meet regular.

Q. And you say you don't meet regularly.

Would that -- would you say once a month? Twice a year? How would you describe it?

A. Once a quarter.

Q. Once a quarter.

And in your role as vice chair, what -- how would you -- strike that.

What would you say that your role in the organization is as the vice chair?

A. Basically to support the chair and preside in the chair's absence.

Q. So would it be fair to describe that role as kind of second in command with the

group?
A. Yes.
Q. And moving on to other organizations, we might have touched on that in the past, but I just want to confirm, are there any other political organizations that you're involved with, Mr. Brown?
A. No.
Q. How about any other activist organizations?
A. No.
Q. And shifting along, we talked about the organizations that you're currently involved in.
Are there any other previous organizations that we didn't just talk about that you have been involved in in the past?
A. No.
Correction. There was -- there was one.
Q. And what was that?
A. We had a Boys Club in Wrens.
Q. And how long ago would you say that

was?
A. It ended about 12 years ago.
Q. And how long would you estimate that you were involved with that?
A. Twelve to 15 years.
Q. Shifting back a little bit to the organizations and groups we discussed, how long would you say that you were involved in the first one we discussed, which was the Prince Hall group?
A. Forty years.
Q. And how about the NAACP?
A. Forty-give, 50 years.
Q. And then the Democratic Committee?
A. Twenty, 25 years.
Q. And for each of them, have you been involved with each of them consistently or were there any breaks during those time periods you described that you were not involved with those groups?
A. Yes.
Q. And let's start back with the Prince Hall group.

During the past 40, 45 years, what were the circumstances under which you weren't involved with them?
A. There was no breaks in that one.
Q. And then how about the NAACP?
A. Yes.
Q. What were those breaks?
A. I just stopped attending for a while.
Q. And when did that occur?
A. I don't recall.
Q. Do you recall if it was recently?
A. No.
Q. And was that break once or would you describe it as occurring multiple times?
A. No, it lasted over a period of time.
Q. Okay. And do you recall how long a period of time that was?
A. No, I don't.
Q. All right. Shifting to the Democratic Committee, were there any breaks in your involvement with the Democratic Committee?

A. No.
Q. Now let's transition to talking about your current employment and your employment history.
Mr. Brown, do you currently work?
A. Only as a poll manager.
Q. And where do you work as a poll manager?
A. In Wrens.
Q. And what are your duties with that?
A. Manage the poll.
Q. How would you describe a typical day of managing the poll?
A. Well, it's hard to describe a typical day because every day is different and every situation is different.
Q. I'll rephrase the question because I probably poorly asked it.
So how would you describe what your interactions -- strike that.
As a poll manager, are you just interacting with other workers or are you interacting with the voters themselves?

A. With -- with both.
Q. With both?
And what are your interactions with the other workers?
A. To make sure everything is set up and running correctly on Election Day.
Q. And then with the voters?
A. To answer questions, give whatever technical assistance they may need.
Q. And what is the time commitment like with that position?
A. Say that again?
Q. What is the time commitment as far as how would you describe -- is it just around the Election Day? Is it in the lead-up? How would you describe it?
A. Well, state law requires us to have training prior to every election.
Q. Let's get into that just a little bit.
What type of training do they require?
A. Whatever new regulations or

1 procedure comes out from Congress or the
2 Secretary of State's office, we have to make
3 sure that we're aware of them.
4 Q. And shifting along, so prior to what
5 you would describe as your current position,
6 did you have any jobs before that?
7 A. Yes, I did work before that.
8 Q. And what did you do?
9 A. I was machine -- machine operator.
10 COURT REPORTER: You were a machine
11 operator?
12 THE WITNESS: Yes.
13 Q. (By Mr. Weigel) What were your
14 duties as a machine operator?
15 A. To manufacture parts.
16 Q. What parts did you manufacture?
17 A. I made parts for the refrigeration
18 units.
19 Q. And how long were you a machine
20 operator?
21 A. Approximately 35 years.
22 Q. Was it always with the same company
23 or with different companies?

A. Same company.
Q. And what company was that?
A. Thermo King Corporation.
Q. Did you leave just because you retired?
A. Yes.
Q. And I assume this was a full-time job.
How many hours a week did you work?
A. Sometimes 50.
Q. And where did this work occur? I assume in Georgia, but what was the specific location?
A. Louisville, Georgia.
Q. And you mentioned it was 30 to 35 years.
Did you work with anyone else before that?
A. Yes.
Q. And was that also as a machine operator or something else?
A. Something else.
Q. And what was that?

A. I guess you would call it a maintenance worker for a contractor owned for by Gordon.

Q. And do you recall the name of your employer with that work?

A. No, I don't.

Q. Now we'll shift again and get a little closer to the subject matter of this case and discuss your voting history.

Mr. Brown, are you registered to vote in Georgia?

A. Yes.

Q. And if you recall, where did you register to vote?

A. At City Hall in Wrens.

Q. And when was that?

A. Around 1971.

Q. Have you ever registered to vote anywhere else?

A. No.

Q. And are you registered to vote at your current address that we identified earlier?

A. Yes.
Q. Have you voted in each election since you've been registered to vote in Georgia?
A. Yes.
Q. So every presidential primary?
A. Yes.
Q. Every general election?
A. Yes.
Q. And every special election?
A. Yes.
Q. And when you voted in the most recent November 2022 election, do you recall what precinct you voted in?
A. 81st Precinct, Wrens.
Q. And for the runoff that we just had, did you vote in a different precinct or that same precinct?
A. Same precinct.
Q. So the 81st?
A. Yes.
Q. And I'm going to presume the answer to this is no based on our prior discussions,

but, Mr. Brown, have you voted in any other state?
A. No.
Q. And has the city and area you've always voted in been the same?
A. Yes.
Q. And do you consider yourself to be a member of the Democratic Party, Mr. Brown?
A. Yes.
Q. And for how long have you considered yourself to be a member of the Democratic Party?
A. I don't recall.
Q. So since you started voting or did it change over time?
A. No, since I started voting.
Q. We touched on this a little bit earlier, but aside from the positions we discussed within the Democratic Committee, have you held any other leadership positions with the Democratic Party?
A. No.
Q. And have you served on any other

1 committees or been involved in any other
2 organizations specifically in connection with
3 the Democratic Party?
4 A. No.
5 Q. And, again, aside from the
6 involvement we discussed previously, have you
7 participated in any other activities with the
8 Democratic Party?
9 A. No.
10 Q. Based on the testimony you've
11 provided, I assume it would be fair to say
12 that you have never considered yourself to be
13 a member of the Republican Party?
14 A. Correct.
15 Q. And it would also be fair to say
16 that you generally support Democratic Party
17 candidates for elections in Georgia?
18 A. Yes.
19 Q. Do you recall if you've ever voted
20 for a Republican candidate?
21 A. I don't recall.
22 Q. And, again, I think we've probably
23 covered this, but have you ever been a member

or held a position with any other political party aside from the Democratic Party?

A. No.

Q. Have you ever worked on political campaigns?

A. No.

Q. And have you ever had involvement with specific voter advocacy groups?

A. No.

Q. All right. Well, we're moving right along, and now we will start talking about this case specifically.

How did you first hear about the lawsuit that you're currently involved in?

A. Attorney Rahul came to my church and announced that our bishop had contacted ACLU to represent us in this lawsuit.

Q. So what did you do after you heard that announcement?

A. He asked for people to sign on, and I did.

Q. So did you sign on right then or was it at a different time?

A. Right then.
Q. And you mentioned something about the bishop contacting -- you said the ACLU, correct?
A. Correct.
Q. And do you know any other facts or circumstances about the bishop contacting it or did you just become aware of that at the time you heard the announcement?
MR. GARABADU: Objection. This is getting a little close to privilege.
MR. WEIGEL: Oh, yeah.
MR. GARABADU: I just ask that Mr. Weigel phrase his questions in a way that doesn't break --
MR. WEIGEL: Yes.
MR. GARABADU: -- attorney/client privilege.
MR. WEIGEL: Of course. Understood.
Q. (By Mr. Weigel) Mr. Brown, of course, any of these questions that I'm asking, do not reveal any conversations, communications that you've had with your

1 attorney. I'm just going to ask -- I will
2 rephrase the question.
3 Are you aware -- prior to signing up
4 on that day as you described earlier, are you
5 aware of any other reasons why the -- strike
6 that.
7 Were you aware of this lawsuit
8 before the announcement -- excuse me. I'll
9 strike that again.
10 Were you aware of the redistricting
11 in Georgia that is the subject matter of this
12 lawsuit before that day that you heard the
13 announcement?
14 A. Yes.
15 Q. And what was that knowledge that you
16 had?
17 A. I heard in the news media that the
18 maps were redrawn and that the legislature
19 has approved them.
20 Q. And when you heard that information
21 in the news media, what was your reaction?
22 A. I felt that the maps were unfair.
23 Q. And why did you think that they were

unfair?
A. Because the way they are drawn, it makes it almost impossible for candidates that I support to be elected.
Q. And would it be fair to say that that conclusion that you came to at that time formed the basis for why you signed up for the lawsuit at that time we previously discussed?
A. Correct.
Q. And prior to this lawsuit and prior to the current redistricting we just discussed, were you satisfied with how the districts were drawn?
A. More than now.
Q. And expand on that a little bit.
Why were you more satisfied with how the districts were drawn then?
A. I think they were fairer then than the districts are now.
Q. And when you're talking about them being fair, what do you mean by that?
A. I mean where both party candidates

have an opportunity to be elected.
Q. When you're talking about them being fair, are you talking about the district map generally across all of Georgia?
A. Yes.
Q. How about your specific district; do you believe that they were fair before as well?
A. Yes.
Q. And following up on that, is it fair to say that you were satisfied with your specific district prior to the redrawing map?
A. More or less content.
Q. And why were you more or less content?
A. Because we did have opportunities to elect our candidates from time to time.
Q. And more specifically in connection with filing lawsuits against the Secretary of State, did you file a lawsuit against the Secretary of State concerning the previously drawn maps?
A. No.

Q. And why didn't you do that?
A. I have never actually filed the lawsuit myself.
Q. So I guess how -- what I -- what I'm getting at is why did you become a Plaintiff in joining this lawsuit against the Secretary of State after the most recent redistricting based on the maps that were drawn then and not the previous drawing of the maps?
A. I joined this lawsuit. I didn't file it.
Q. So would it be fair to say you just did not have the opportunity to file a lawsuit previously or do you have more of a specific reason for not filing a similar lawsuit based on the previously drawn maps?
A. No, the opportunity didn't present itself.
Q. So turning back to this lawsuit, what's your goal with this lawsuit?
A. To have fair maps drawn.
Q. And when you're talking about having fair maps drawn, do you mean generally across

the entire state of Georgia?
A. Yes.
Q. And same question with your specific district, do you want fair maps drawn with specific focus on your district as well?
A. Yes.
Q. And shifting back a little bit to, again, how you got involved in the lawsuit, and, again, to your -- the point that your attorney made earlier, certainly do not reveal the subject matter or nature of any communications you had with your lawyer, I just want to know the facts and details surrounding how you first become involved in the case.
Do you recall when you first communicated with your lawyer about the case?
A. I told you that.
Q. Okay. So it was just the previous discussion we had about the announcement at the church?
A. Correct.
Q. And, again, we probably already

1 covered this, but is it fair to say that you
2 did not do -- strike that.
3 Prior to joining the lawsuit, did
4 you personally do any research concerning the
5 issues in this case beyond what we previously
6 discussed with hearing about it on the news?
7 A. No.
8 Q. Turning back to that a little bit,
9 was this one news report that you saw about
10 the redistricting or multiple news reports?
11 A. Multiple.
12 Q. And was that over one day or
13 multiple days?
14 A. Several days.
15 Q. And do you recall if these were
16 local news reports, national news media, or a
17 collection of both?
18 A. Collection of both.
19 Q. And I know we discussed you signing
20 up when you heard the announcement in your
21 church that day, but do you know what type of
22 contract, if any, you signed specifically
23 with the attorney or is that what you meant

by you signed up with the case?
A. No.
Q. And are you paying your attorneys in this case, Mr. Brown?
A. No.
Q. Do you know how your attorneys are being paid, if at all?
A. I do not.
Q. And are you -- have you personally been paid or received anything of value in exchange for your participation as a Plaintiff in this lawsuit?
A. No.
MR. WEIGEL: And, Mr. Brown, we're about to shift gears again. I just wanted to check in and see if you -- do you need a break or anything or are you ready to keep going with these questions?
A. No, I'm good.
Q. All right. Great.
What I'm going to do now, Mr. Brown, is I'm going to share my screen as I did previously for what's going to be marked as

Defendant's Exhibit 2.
(Whereupon, Defendant's Exhibit No. 2 was marked for identification.)
MR. WEIGEL: And, Counsel, can we -- do you happen to have a copy? My screen sharing is not working. Do you have a copy of the Amended Complaint that you could put in front of Mr. Brown?
MR. GARABADU: I can pull up the Amended Complaint, if you give me just a second.
MR. WEIGEL: Okay. Perfect. Yeah, it's just going to be paragraph 21. Starts on page 10 and continues on page 11.
Thank you for your assistance. Sorry about this.
MR. GARABADU: Yeah, no problem. And I'm just pulling it up straight from the docket.
MR. WEIGEL: Okay.
MR. GARABADU: Do you have the document number handy?
MR. WEIGEL: Yes. It is 141.

MR. GARABADU: Okay. Give me just a second.

And do you want me to pull it up -- I can pull it up on my laptop here, which is what I was going to do, but would you rather share it on the screen so everyone can see it?

MR. WEIGEL: That would be great if it's -- if it's easier.

MR. GARABADU: Okay. Let me do that.

MR. WEIGEL: And, Madam Court Reporter, we can be off the record for this. Sorry. I'll let you know when we're back on.

(Discussion held off the record.)

MR. WEIGEL: I think we can go back on the record now.

Thank you, Counsel.

Q. (By Mr. Weigel) Mr. Brown, your attorney has pulled up for you what will be marked as Defendant's Exhibit 2, which is the Amended Complaint in this matter.

Mr. Brown, are you familiar with

this document or with your attorneys filing this document in this matter?

A. No.

Q. Have you seen this document or a similar document filed -- that was filed by your attorneys in this matter?

A. No.

Q. Now, Mr. Brown, I'm going to have your attorney scroll down to what is going to be paragraph 21 of this Complaint. It starts on page 10 of the Amended Complaint and continues on to page 11.

And, Mr. Brown, do you see the paragraph that starts off with, Plaintiff Phil S. Brown?

A. Yes.

Q. I'm going to ask you to read to yourself that entire paragraph. You don't have to read it out loud or anything, but just if you could, quickly read through that paragraph, and let me know when you're finished.

A. Okay. I'm finished.

Q. And I know that we touched on a little bit of the information that was in this paragraph in your previous testimony, but are you familiar with and do you generally recognize the allegations that are contained in this paragraph?

A. Yes.

Q. And is there any information contained in this paragraph that is -- strike that.

Is the information contained in this paragraph accurate as it relates to you?

A. Yes.

Q. Thank you.

MR. WEIGEL: And thank you, Counsel. I think we can take that down now.

Q. (By Mr. Weigel) And we touched on it a little bit earlier as well, but that paragraph mentioned that you reside -- that you reside in, vote in state Senate District 23.

And you mentioned that you voted in the 2022 general election, correct?

A. Correct.
Q. And did the candidate that you voted for in state Senate District 23 succeed?
A. No.
Q. Going back to the 2022 election, did you reside in state Senate District 23 then?
A. Yes.
Q. And do you recall if the candidate that you voted for in state Senate District 23 in the 2020 general election succeed (sic)?
A. Yes.
Q. Moving on a little bit to the process in which the maps were redrawn by the Georgia legislature. Mr. Brown, did you reach out to any legislator during the 2021 special session concerning the redistricting issues that have been raised in this lawsuit?
A. I don't recall.
Q. And do you recall if you reached out to any legislators before or after the special session?
A. No.

Q. Did you testify in the Georgia Assembly on those issues raised in your Complaint or any issues pertaining to redistricting in 2021?

A. No.

Q. And did you attend any hearings in the Georgia legislature pertaining to redistricting during --

A. No.

Q. And did you attend any other meetings concerning redistricting in 2021?

A. No.

Q. And we're going to now turn to the phrase "community of interest."

Mr. Brown, do you have an understanding of what this phrase, "community of interest," means?

A. I'm not sure.

Q. And when I say it just generally, how would you characterize the community that you live in?

A. I would say it's a rural, small community with not very many amenities.

Q. And what do you consider to be the important interests of that community that you live in?

A. I think surviving and thriving.

Q. When you say "surviving and thriving," what do you mean by that?

A. I mean providing for your family and making a life for your family.

Q. And when it comes to elected officials and those interests that you just described, what do you think the connection is between those elected officials and those interests?

A. I think state and federal government gives the money to communities in need if you have someone to represent and speak up for you.

Q. So when you're talking about the community receiving that need from the state or federal government and you're discussing the community in which you live, do you think that it is fairly unique to that specific community or does it extend beyond that?

A. I can only speak for my community.
Q. Mr. Brown, shifting again a little bit, do you participate in any neighborhood or community associations?
A. No.
Q. You mentioned your church earlier. What is the name of that church?
A. Lofton African Methodist Episcopal Church.
Q. And presently, are you a member of any other faith-based organizations?
A. No.
Q. And how close is your church to where you live?
A. About five miles.
Q. And how long have you attended the services at this church?
A. As long as I can remember.
Q. So since you were a child?
A. Yes.
Q. And as far as your regular attendance at church services, does that occur at any other church or just the one

that you identified?
A. No, I regularly attend another church.
Q. And what is that other church?
A. It's Sand Valley African Methodist Episcopal Church.
Q. And how far away is that church from you?
A. It's about 15 miles.
Q. And you had mentioned the Lofton church. I believe you had said that you had been attending church services there for as long as you can remember.
How long have you been attending services at the Sand Valley church?
A. Probably 40 years.
Q. And when comparing these churches and your involvement, is there one that you are more involved with than the other?
A. Yes.
Q. And which one is that?
A. Lofton.
Q. Why would you describe yourself as

being more involved with that one?
A. That is a church I'm a member of.
Q. Sorry. I'll rephrase the question a little bit.
What are the specific activities that you -- whether it be leadership or events that you're involved in with the church -- the Lofton church?
A. I do have a leadership position.
Q. And what is that leadership position?
A. A steward pro tem.
Q. What does that position involve you doing?
A. Steward pro tem acts instead of the pastor if there's an absence of the pastor.
Q. And are you involved in any other activities or groups in the Lofton church that you participate in?
A. Yes.
Q. And what are those activities and groups?
A. I'm a member of the layman's

organization. I participate in Sunday school.

COURT REPORTER: I'm sorry. I think you broke up on the first part of the answer.

THE WITNESS: I'm a member of the lay organization, or the layman's organization.

Q. (By Mr. Weigel) And what do you do as a member of the layman's organization?

A. I'm a president of a local lay organization.

Q. What kind of activities does the layman's organization do within the community?

A. Basically, we train church members in the history and the ways of the church.

Q. Shifting back to the Sand Valley. Now, I know that you said you were more involved because you were a member with the Lofton church, but are you involved in any activities or groups in the Sand Valley church?

A. The two churches work together as a

circuit.
Q. Oh.
And is it fair to say that that is how you became involved with the second church?
A. Yes.
Q. So it would be fair to say that the activities that you were involved in -- with one church still benefit, effect and are kind of in conjunction with the activities of the other church?
A. That is correct.
Q. One is just located geographically in a different location, correct?
A. Correct.
Q. And shifting a little bit, are you involved in any other -- any school associations or activities?
A. No.
Q. And aside from your involvement in activities within the church, where do you socialize, typically?
A. I usually don't.

Q. Then combining that a little bit with your church activities, outside of attending specific religious services or doing any type of specific religious activity, how often would you say that you participate in activities, events that are affiliated with your church?

A. Quite often.

Q. Would you say it's weekly? Twice a month?

A. Probably monthly.

Q. Monthly.

And do these activities involve engagement with the community more generally or is it just within the church committee?

A. Some with the community in general, some with just the church.

Q. And how would you describe the interactions with the community more generally?

A. From time to time, charity opportunities come available to the church, and we share it with the community.

Q. And can you describe a little bit in more detail the types of charity opportunities that you participate in with the church?

A. Well, during the pandemic, we was able to distribute food that was donated to the communities.

Q. And then shifting along a little bit, we're going to get into kind of the more specific details and claims of the case itself. And these are going to be fairly direct questions, Mr. Brown, depending on the answer. So we'll just go through them one at a time fairly quickly.

Mr. Brown, have you ever been prohibited from registering to vote based on your race?

A. No.

Q. And have you ever been prohibited from participating in the political process based on your race?

A. No.

Q. Do you have any personal knowledge

of discrimination by the Government of Georgia against members of the minority group related to participation in the democratic process?

A. No.

Q. And, Mr. Brown, this -- the phrase I'm about to describe is similar to the phrase I described earlier, so it's -- I'm just going to see if you have familiarity with the phrase.

Do you know what the phrase "racially polarized voting" is?

A. Yes.

Q. And what is that?

A. When people vote along racial lines.

Q. And why do you think that happens?

A. To keep candidates from other races from winning the election.

Q. And when you say keep candidates from winning the election, what do you mean by that?

A. I mean if there's a black candidate and a white candidate, white people vote for

1 white candidates regardless of
2 qualifications.
3 Q. And in your opinion, do black voters
4 in Georgia generally vote for Democratic
5 candidates.
6 A. Yes.
7 Q. And do you personally know any black
8 voters who have told you that they voted for
9 Republican candidates?
10 A. No.
11 Q. Do you know if Georgia uses a
12 majority vote requirement in its elections?
13 A. No, it doesn't.
14 Q. And do you recall the special
15 election that just occurred for the United
16 States Senate between Raphael Warnock and
17 Herschel Walker?
18 A. Yes.
19 Q. And do you recall why that special
20 election occurred?
21 A. Yes.
22 Q. And why did it occur?
23 A. Because neither candidate got 50

1 percent plus 1.
2 Q. And do you recall a similar process
3 occurring back in 2021 for the 2020 general
4 election for the United States Senate with
5 Senator Warnock and Senator Office -- Ossoff?
6 Excuse me.
7 A. Yes.
8 Q. And going back to that runoff
9 election for Senator Warnock and Senator
10 Ossoff, both of those candidates won their
11 runoff races, correct?
12 A. Correct.
13 Q. And who did you vote for in those
14 races?
15 A. Senator Warnock and Senator Ossoff.
16 Q. And in the most recent runoff
17 election between Raphael Warnock and Herschel
18 Walker, who did you vote for?
19 A. Senator Warnock.
20 Q. And you recall that Senator Warnock
21 won that race, correct?
22 A. Yes.
23 Q. Are you familiar with the term

"candidate-slating process"?
A. No.
Q. And so it would be fair to say that you do not know whether there is a candidate-slating process in Georgia, correct?
A. That is correct.
Q. And moving back to participating in the election process, Mr. Brown, for you, has a lack of employment opportunities kept you from participating in Georgia politics?
A. No.
Q. Has a lack of access to adequate health services kept you from participating in Georgia politics?
A. No.
Q. And are you aware of the term "racials appeals" when used in the context of elections?
A. No.
Q. And this will shift back a little bit to the prior discussion we've had about racially polarized voting, but do you think

that candidates in the election process use racially charged tactics when running for office?

A. I don't think I'm qualified to answer that question.

Q. Let's ask it a little bit differently.

Have you ever personally seen campaigns in Georgia characterized by this type of racial campaign tactics?

A. Yes.

Q. And do you recall any specific examples of when that occurred?

A. Not at this time.

Q. And do you know how many black people have run for office in Georgia?

A. No.

Q. And do you know how many black people have been elected to public office in Georgia?

A. No.

Q. And are you familiar with Harold Melton, the former chief justice of the

Georgia Supreme Court?
A. Heard the name.
Q. And are you aware that former Chief Justice Melton is black?
A. No.
Q. Were you aware that in his position as chief justice of the Georgia Supreme Court, this was because chief -- former chief justice Melton was elected?
A. I'm not sure.
Q. And turning back to the most recent special election between Senator Raphael Warnock and Herschel Walker that we touched on a little bit earlier, you are aware that both candidates in that election are black, correct?
A. Correct.
Q. And you know that Herschel Walker ran as a Republican, correct?
A. Correct.
Q. And that to run as a Republican, Herschel Walker had to win a Republican primary, correct?

A. I'm not sure.
Q. But you -- turning back, you -- to confirm, you do know that he ran as a candidate of the Republican Party?
A. Yes.
Q. So that even if your preferred candidate, Raphael Warnock, lost, Georgia still would've been represented by Herschel Walker in the United States Senate.
You understand that, correct?
A. Yes.
Q. Mr. Brown, do you believe that there are any needs of the minority community in Georgia that, in your opinion, differ from those of white residents?
A. Yes.
Q. And what are those?
A. There are many.
Q. Could you describe a few or maybe just the most important ones for me?
A. Well, for years, the black community has been overlooked when it comes to city, state, and county money. So there's a lot of

needs in the black community.

MR. WEIGEL: Mr. Brown, I believe that completes my questioning.

Counsel, do you have any questions that you would like to get on the record?

MR. GARABADU: I might. Can we take a 10-minute break --

MR. WEIGEL: Yeah, yeah, yeah. That sounds great.

MR. GARABADU: Okay. Great.

MR. WEIGEL: That's perfect.

MR. GARABADU: Maybe 11:10, if that sounds okay to folks?

MR. WEIGEL: That -- that sounds great.

So we'll be off the record for now and then reconvene at 11:10.

(Short recess.)

MR. WEIGEL: We are now back on the record.

Questioning for the Defendant is completed, but I believe that counsel has a few questions.

And it is now your turn.

MR. GARABADU: Thank you, Counsel.

EXAMINATION

BY MR. GARABADU:

Q. Mr. Brown, I have a couple more questions just to follow up on Mr. Weigel's questioning from earlier. And I wanted to start by asking you a few questions about recent elections in your state Senate district.

Do you remember Mr. Weigel asking you some questions about recent state Senate elections?

A. Yes.

Q. And do you recall if your preferred candidate won the state Senate election in the 2020 election cycle?

A. No.

Q. Okay. Do you recall if your preferred candidate won in the state Senate election in 2022?

A. It did not.

Q. Okay. And now, Mr. Brown, do you

recall Mr. Weigel asking you some questions about a previous arrest?

A. Yes.

Q. Were you ever convicted of a felony in that instance?

A. No.

Q. Now, Mr. Brown, do you recall Mr. Weigel asking you some questions regarding discrimination and access to the ballot box?

A. Yes.

Q. Mr. Brown, do you -- strike that.

Mr. Brown, in your opinion, have black people faced obstacles when voting in elections in the past?

A. Yes.

MR. WEIGEL: Let me just quickly for the record object to that question as leading, but the witness may answer and the answer may stand.

Q. (By Mr. Garabadu) Mr. Brown, do you believe black people have faced obstacles in voting?

A. Yes.
Q. And how so?
A. Black people are intimidated when coming to the poll.
And early voting, we have to drive to Louisville, which is 15 miles away, to vote early.
Q. And why exactly is -- is -- in that early voting context, how has that been an obstacle for black voters?
A. Because a lot of people don't have adequate transportation.
And also, most people in Wrens don't know to Louisville.
MR. GARABADU: Thank you, Mr. Brown. I have no further questions.
MR. WEIGEL: Okay. Well, I will just have a few quick follow-ups based on those questions.
FURTHER EXAMINATION
BY MR. WEIGEL:
Q. Now, Mr. Brown, you answered your attorney's question and mentioned

intimidation at the polls.

Mr. Brown, are you aware of any specific instances that you can expand upon of that occurring?

A. No, sir, but generally.

Q. So you only have a general understanding of that occurring?

A. Yes.

Q. And then moving on to your testimony about the early voting; now, you mentioned that you need to go to Louisville for early voting?

A. Yes.

Q. How far a drive would you say that is?

A. It's 15 miles from the town limits.

Q. And aside from that, do you believe that your access to the polling aside from early voting is limited in any way aside from the instance that you just testified to?

A. No.

MR. WEIGEL: Okay. Thank you. That completes my questioning.

Counsel, I didn't know if you had any further follow-ups that you wanted to go into.

MR. GARABADU: No, I have no questions.

MR. WEIGEL: Thank you.

Mr. Brown, I really do appreciate you taking time to speak with us today, and thank you for sitting for this deposition.

I believe that completes the deposition, and we are off the record.

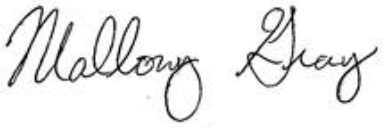
FURTHER DEPONENT SAITH NOT

CERTIFICATE

STATE OF ALABAMA)
) ss:
COUNTY OF MARSHALL)

I hereby certify that the above and foregoing proceeding was taken down by me by stenographic means, and that the content herein was produced in transcript form by computer aid under my supervision, and that the foregoing represents, to the best of my ability, a true and correct transcript of the proceedings occurring on said date at said time.

I further certify that I am neither of counsel nor of kin to the parties to the action, nor am I in anywise interested in the result of said cause.



/s/Mallory B. Gray
Mallory B. Gray, CCR
CCR #558, Expires 9/30/2023
Commissioner for the
State of Alabama at Large
Notary Public, Expires 02/23

Ayana Williams
Ayana.Williams@wilmerhale.com

January 10, 2023

RE: Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
12/15/2022, Phil Brown (#5618951)

The above-referenced transcript is available for review.

Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet.

The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at cs-southeast@veritext.com.

Return completed errata within 30 days from receipt of testimony.

If the witness fails to do so within the time allotted, the transcript may be used as if signed.

Yours,

Veritext Legal Solutions

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

Phil Brown (#5618951)

E R R A T A S H E E T

PAGE_____ LINE_____ CHANGE_____

_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

_____

REASON_____

_____ _____

Phil Brown Date

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
Phil Brown (#5618951)

ACKNOWLEDGEMENT OF DEPONENT

I, Phil Brown, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.

_____ _____

Phil Brown Date

*If notary is required

SUBSCRIBED AND SWORN TO BEFORE ME THIS
_____ DAY OF _____, 20___.

_____

NOTARY PUBLIC

0

02/23 74:21
05337 1:5

1

1 3:14 11:15,22 18:18 63:1
10 47:14 49:11 68:7 75:3
11 3:14 47:14 49:12
110 21:10
11:10 68:12,17
12 28:2
12/15/2022 75:5
141 47:23
15 1:23 2:15 28:5 55:9 71:6 72:16
15th 2:7,18 5:8
1600 4:10
18174 18:18
18327 74:18
1875 4:6
1971 22:6,12 23:10 34:17
1998 2:15
1999 19:7,11 20:2 21:11
1:21 1:5

2

2 3:15 47:1,2 48:21
20 77:15
200 4:10
20001 4:6
2020 51:10 63:3 69:17
2021 51:16 52:4,11 63:3
2022 1:23 2:8 2:18 5:8 35:13 50:23 51:5 69:21
2023 75:3
21 47:13 49:10
23 50:21 51:3,6 51:10
25 28:15

3

30 13:18 33:15 75:17
30339 4:11
35 13:18 32:21 33:15

4

40 29:1 55:16
45 29:1
47 3:15

5

5 2:13
50 28:13 33:10 62:23
503 20:5
558 74:19
5618951 75:5 76:2 77:2

6

6 3:4
69 3:5

7

71 3:6 19:5,14

8

81st 35:15,20

9

9 18:18
9/30/2023 74:19

a

a.m. 2:9 5:8
ability 74:10
able 60:6
above 5:9 74:4 75:6 77:7
absence 26:21 56:16
access 64:13 70:9 72:18
accordance 2:13
accuracy 75:9
accurate 50:12
achieved 16:5
acknowledge... 77:3
acknowledg... 75:12
aclu 38:16 39:3
acting 5:3
action 15:17 74:15
activist 27:9
activities 37:7 56:5,18,21 57:12,21 58:8 58:10,18,21 59:2,6,13
activity 59:5
acts 56:15
actually 43:2
additions 77:6
address 18:17 19:4,7,20,23 20:2,9,11 21:6 21:7,8 34:22
addresses 19:12
adequate 64:13 71:12
advised 2:20
advisory 25:7
advocacy 38:8
affiliated 59:7
affirmed 6:16
african 1:9 54:8 55:5
ago 13:18 14:6 22:4 27:23 28:2
agree 10:20
agreeable 6:2 9:20
agreed 2:2,10

ahead 10:19
aid 74:8
airline 23:9
alabama 2:14 5:2,4 74:2,20
allegations 50:5
allotted 75:20
allowed 5:18
alpha 1:7,7 7:6 7:6,14,14,19,19 7:23,23 75:4,4 76:1,1 77:1,1
amended 2:14 3:15 47:7,10 48:22 49:11
amenities 52:23
announced 38:16
announcement 38:19 39:9 40:8,13 44:20 45:20
answer 5:22 9:9,12,14,17 10:4 31:8 35:22 57:4 60:13 65:5 70:19,20
answered 71:22
answers 9:4
anywise 74:15
apart 16:11
appeals 64:18
appearance 7:2 7:10
appearing 6:21
appended 77:7
applicable 75:8
appreciate 73:7
approved 40:19
approximate 22:10
approximately 2:8 5:7 32:21
area 15:8 23:6 23:12 36:4
arrest 70:2
arrested 16:23
aside 15:11 16:22 17:5 20:19 36:18 37:5 38:2 58:20 72:17,18 72:19
asked 10:2 19:15 30:18 38:20
asking 13:5 39:22 69:8,11 70:1,8
aspect 8:14
assembly 52:2
assistance 31:9 47:15
associations 54:4 58:18
assume 33:7,12 37:11
atlanta 1:3 4:11
attached 75:11
attend 52:6,10 55:2
attendance 54:22
attended 54:16
attending 29:8 55:12,14 59:3
attorney 9:16 9:18 12:18 38:15 39:17 40:1 44:10 45:23 48:20 49:9 75:13
attorney's 71:23
attorneys 46:3 46:6 49:1,6
audibly 9:6
audio 8:19
augusta 20:12
available 59:22 75:6
ave 4:6
aware 32:3 39:8 40:3,5,7 40:10 64:17 66:3,6,14 72:2
awesome 8:1
ayana 75:1
ayana.williams 75:2

b

b 2:5,15 3:11 74:18,19
back 20:22 28:6,22 43:19 44:7 45:8 48:14,16 51:5 57:17 63:3,8 64:8,21 66:11 67:2 68:19
bailey 1:12
ballot 70:10
based 35:23 37:10 43:8,16 54:11 60:16,21 71:18
basically 26:20 57:15
basis 41:7
behalf 1:8 6:22 7:22
believe 42:7 55:11 67:12 68:2,22 70:22 72:17 73:10
benefit 58:9
best 8:23 9:8,12 12:3 74:9
better 18:5 23:22

beyond 45:5 53:23
bishop 38:16 39:3,7
bit 15:7 16:15 21:19 28:6 31:20 36:17 41:16 44:7 45:8 50:2,18 51:13 54:3 56:4 58:16 59:1 60:1,9 64:22 65:6 66:14
black 61:22 62:3,7 65:15 65:18 66:4,15 67:21 68:1 70:14,22 71:3 71:10
board 16:3
box 70:10
boys 27:22
brad 1:17 5:17 75:4 76:1 77:1
bradberry 5:1
break 9:22 10:2 10:5 29:14 39:15 46:17 68:7
breaks 28:18 29:4,7,21
bringing 11:21
broke 57:4
brown 1:12,22 2:4 5:9,16 6:15 7:7 8:3 9:20 11:8,19 12:5,8 12:13 13:4 16:15 17:8 18:12,15,16 19:3,8 21:19 22:20 27:7 30:5 34:10 36:1,8 39:20 46:4,14,21 47:8 48:19,23 49:8,13,15 51:15 52:15 54:2 60:12,15 61:6 64:9 67:12 68:2 69:5,23 70:7 70:12,13,21 71:15,22 72:2 73:7 75:5 76:2 76:24 77:2,4 77:12
brown's 6:23

c

c 4:1
caitlyn 4:4 7:15 7:18
call 7:10 34:1
calvo 4:4 7:12 7:13
campaign 65:10
campaigns 38:5 65:9
candidate 37:20 51:2,8 61:22,23 62:23 64:1,5 67:4,7 69:16,20
candidates 37:17 41:3,23 42:17 61:17,19 62:1,5,9 63:10 65:1 66:15
capacity 1:17
case 1:5 13:20 14:3,7,10 15:11,13 16:4 17:8,9 18:7 34:9 38:12 44:15,17 45:5 46:1,4 60:10
cause 5:9 74:16
ccr 2:5 74:19 74:19
cell 10:11,21
certainly 11:13 44:10
certificate 74:1
certifications 23:1
certify 5:3 74:4 74:13
chair 26:7,16 26:19,20
chair's 26:21
change 36:15 76:4,7,10,13,16 76:19
changes 75:10 77:6
characterize 52:20
characterized 65:9
charged 16:16 65:2
charity 24:16 59:21 60:2
check 46:16
chief 65:23 66:3,7,8,8
child 54:19
church 1:10 38:15 44:21 45:21 54:6,7,9 54:13,17,22,23 55:3,4,6,7,11 55:12,15 56:2 56:8,8,18 57:15,16,20,22 58:5,9,11,21 59:2,7,15,17,22 60:4
churches 55:17 57:23
circle 4:10
circuit 58:1
circumstances 29:2 39:7

city 34:15 36:4 67:22
civil 2:14 5:5 5:19
claims 60:10
clarification 8:15
clarify 23:22
class 15:17
clearly 8:23
client 39:17
close 11:9 39:11 54:13
closer 34:8
club 27:22
collection 45:17,18
combining 59:1
come 59:22
comes 32:1 53:9 67:22
coming 71:4
command 26:23
commencing 2:8 5:7
commission 16:2
commissioner 5:3 74:20
commitment 31:10,13
committee 24:6 26:1 28:14 29:21,23 36:19 59:15
committees 37:1
communicated 44:17
communicati... 39:23 44:12
communities 53:15 60:7
community 24:17 52:14,16 52:20,23 53:2 53:19,21,23 54:1,4 57:14 59:14,16,19,23 67:13,21 68:1
companies 32:23
company 32:22 33:1,2
comparing 55:17
complaint 3:15 47:7,10 48:22 49:10,11 52:3
complete 9:11 10:4 22:7 77:8
completed 9:14 21:22 22:2,11 68:22 75:17
completes 68:3 72:23 73:10
computer 10:13,15 74:8
concerning 42:21 45:4 51:17 52:11
conclusion 41:6
conditions 15:2
confirm 10:8 10:20,23 11:13 14:19 15:18 27:5 67:3
confuse 8:12
congress 32:1
conjunction 58:10
connection 18:7 37:2 42:18 53:11
consider 36:7 53:1
considered 36:10 37:12
consistently 28:17
contacted 38:16
contacting 39:3 39:7
contained 50:6 50:9,11
content 42:13 42:15 74:6
context 64:18 71:9
continues 47:14 49:12
contract 45:22
contractor 34:2
conversations 39:22
convicted 17:6 70:4
conviction 17:3
copies 75:14
copy 47:5,6
corporation 33:3
correct 14:12 15:19,20 37:14 39:4,5 41:10 44:22 50:23 51:1 58:12,14 58:15 63:11,12 63:21 64:6,7 66:16,17,19,20 66:23 67:10 74:10 77:8
correction 19:6 27:19
corrections 77:6
correctly 11:20 31:6
counsel 2:4 5:6 6:3 7:1 47:4 48:18 50:15 68:4,22 69:2 73:1 74:14 75:14
county 14:1,12 14:16,17 16:2

18:20 24:6 67:23 74:3
couple 8:22 69:5
course 10:14 39:19,21
court 1:1 2:6 2:21,22 5:1 8:20 9:1 16:9,9 18:22 19:2 32:10 48:12 57:3 66:1,8
covered 15:8 37:23 45:1
covers 8:2
crime 16:16
cs 75:15
current 18:16 20:1 21:5,6 25:14 30:3 32:5 34:22 41:12
currently 20:9 23:15,16 27:13 30:5 38:14
cut 9:8
cv 1:5
cycle 69:17

d

d 2:13 3:1
dan 2:16 4:9 6:20
date 5:4 12:19 22:11 74:11 76:24 77:12
dates 22:1
day 30:12,15 30:15 31:6,15 40:4,12 45:12 45:21 77:15
days 45:13,14 75:17
dc 4:6
deal 14:11
december 1:23 2:8,18 5:8
declare 77:4
deemed 77:6
defendant 1:19 3:13 4:8 5:16 6:22 68:21
defendant's 11:15,22 47:1 47:2 48:21
delivering 2:16
democratic 24:6 25:23 28:14 29:21,22 36:8,11,19,21 37:3,8,16 38:2 61:3 62:4
denise 7:21
depending 60:12
deponent 73:13 75:13 77:3
deposing 75:13
deposition 1:21 2:4,12 3:14 5:16 6:1 8:5,11 8:18 10:7,10 10:16 11:2 12:17,18,20 13:9 14:22 15:4 17:13,17 20:7 73:9,11
describe 24:18 26:5,12,22 29:15 30:12,14 30:19 31:14,16 32:5 55:23 59:18 60:1 61:7 67:19
described 10:21 28:19 40:4 53:11 61:8
detail 60:2
details 44:13 60:10
devices 10:9
differ 67:14
different 18:3 21:7,8 30:15 30:16 32:23 35:17 38:23 58:14
differently 65:7
direct 60:12
discovery 5:18
discrimination 61:1 70:9
discuss 34:9
discussed 17:9 17:12 21:16 28:7,9 36:19 37:6 41:9,13 45:6,19
discussing 53:20
discussion 7:4 44:20 48:15 64:22
discussions 35:23
distribute 60:6
district 1:1,2,9 14:1 16:12 42:3,6,12 44:4 44:5 50:20 51:3,6,10 69:10
districting 14:11
districts 16:3 41:14,18,20
division 1:3
docket 47:19
document 12:5 12:9,14,23 18:4 47:22 49:1,2,4,5
documents 18:9
doing 56:14 59:4
donated 60:6
donations 24:16

drawing 43:9
drawn 41:2,14 41:18 42:22 43:8,16,21,23 44:4
drive 71:5 72:14
dui 16:21 17:2
duma 4:9 6:21
duties 30:10 32:14

e

e 3:1,11 4:1,1 10:12,22 76:3 76:3,3
earlier 15:12 21:6 34:23 36:18 40:4 44:10 50:18 54:6 61:8 66:14 69:7
early 71:5,7,9 72:10,11,19
easier 48:9
education 21:20,22 23:5 23:11
effect 58:9
effective 2:15
either 12:17 20:23 21:2,12
elect 13:23 16:2 42:17
elected 41:4 42:1 53:9,12 65:19 66:9
election 15:13 16:13 31:6,15 31:18 35:2,8 35:10,13 50:23 51:5,10 61:18 61:20 62:15,20 63:4,9,17 64:9 65:1 66:12,15 69:16,17,21
elections 37:17 62:12 64:19 69:9,13 70:15
electronic 10:8
electronically 6:8
employer 34:5
employment 30:3,4 64:10
encounter 8:20
ended 28:2
engagement 59:14
english 4:9 6:21
entire 12:9 22:18 44:1 49:18
episcopal 1:10 54:8 55:6
eric 1:11
errata 75:11,13 75:17
especially 8:21 8:21 9:3
estimate 22:4 28:3
events 18:1 56:7 59:6
exact 13:17
exactly 71:8
examination 3:3 5:10 6:18 69:3 71:20
examples 65:13
except 5:20
exchange 46:11
excuse 40:8 63:6
exhibit 2:19 3:14,15 11:15 11:22 12:23 47:1,2 48:21
exhibits 3:16 10:17
expand 41:16 72:3
expires 74:19 74:21
extend 53:23

f

faced 70:14,22
facts 39:6 44:13
fails 75:19
fair 19:16 22:16 26:22 37:11,15 41:5 41:22 42:3,7 42:10 43:12,21 43:23 44:4 45:1 58:3,7 64:3
fairer 41:19
fairly 53:22 60:11,14
faith 54:11
familiar 48:23 50:4 63:23 65:22
familiarity 61:9
family 16:12 21:4 53:7,8
far 31:13 54:21 55:7 72:14
fast 15:10 24:8
federal 5:19 16:9 53:14,20
felony 70:4
felt 40:22
file 42:20 43:11 43:13
filed 2:22 13:23 16:6,9,12 43:2 49:5,5
filing 42:19 43:15 49:1
finally 9:7 10:6
finances 25:21
fine 11:9,11,13
finish 9:10
finished 49:22 49:23

firm 6:21
first 5:23 8:23 13:7 19:15 24:9 28:9 38:13 44:14,16 57:4
five 54:15
focus 44:5
folks 68:13
follow 69:6 71:18 73:2
following 5:10 42:10
follows 6:17
food 60:6
foregoing 5:5 74:5,9 77:5
form 5:21 74:7
formed 41:7
former 65:23 66:3,8
forty 28:11,13
fraternal 24:12
fraternity 1:7 75:4 76:1 77:1
friedman 4:4 7:12,13
front 47:8
full 18:14 20:23 21:2 33:7
fully 14:21 15:2 21:12
further 2:10 71:16,20 73:2 73:13 74:13

g

garabadu 3:5 4:5 6:4,7,11 7:3,5,6 11:5 39:10,13,17 47:9,17,21 48:1,10 68:6 68:10,12 69:2 69:4 70:21 71:15 73:4
gears 15:7 18:12 21:18 46:15
general 35:8 50:23 51:10 59:16 63:3 72:6
generally 37:16 42:4 43:23 50:5 52:19 59:14,20 62:4 72:5
geographically 58:13
georgia 1:2,9 1:10,18 4:11 14:14 18:19 19:17 20:5 21:10 22:15,17 33:12,14 34:11 35:4 37:17 40:11 42:4 44:1 51:15 52:1,7 61:2 62:4,11 64:5 64:11,15 65:9 65:16,20 66:1 66:7 67:7,14
getting 39:11 43:5
give 9:5 22:10 28:13 31:8 47:10 48:1
given 13:7 77:9
gives 53:15
glenn 1:12
go 10:19 24:7 48:16 60:13 72:11 73:2
goal 43:20
going 5:20 8:3 8:9,21 10:10 11:18,19 13:5 15:6 21:18 35:22 40:1 46:18,21,22,23 47:13 48:5 49:8,9,17 51:5 52:13 60:9,11 61:9 63:8
good 46:19
gordon 34:3
government 53:14,20 61:1
graduated 22:12
gray 2:5,15 5:1 74:18,19
great 6:13 11:2 46:20 48:8 68:9,10,15
group 27:1 28:10,23 61:2
groups 24:1 28:7,20 38:8 56:18,22 57:21
guess 15:9 34:1 43:4

h

h 3:11 76:3
hall 24:5,10 28:10,23 34:15
handle 6:6
handy 47:22
happen 47:5
happens 61:16
hard 30:14
harold 65:22
head 13:15
health 64:14
hear 9:2 38:13
heard 8:7,9 38:18 39:9 40:12,17,20 45:20 66:2
hearing 45:6
hearings 52:6
held 7:4 36:20 38:1 48:15
help 17:23 18:4
hereto 77:7
herschel 62:17 63:17 66:13,18 66:22 67:8

hi 7:15
high 22:8,11,12 22:13,14
highest 21:21
highway 18:18
history 30:4 34:9 57:16
hoping 16:5
hotel 20:16,17
hours 33:9
house 21:4
hudson 21:10
huh 9:5
hyatt 20:12,18

i

identification 11:16 47:3
identified 21:16 34:22 55:1
important 8:22 10:7 53:2 67:20
impossible 41:3
include 10:10
including 7:7
information 40:20 50:2,8 50:11
instance 16:22 17:6 70:5 72:20
instances 72:3
instinct 9:4
interacting 30:22,23
interactions 30:20 31:3 59:19
interest 52:14 52:17
interested 74:15
interests 53:2 53:10,13
interrupt 11:6
intimidated 71:3
intimidation 72:1
involve 56:13 59:13
involved 23:15 24:1 27:7,14 27:17 28:4,8 28:17,20 29:3 37:1 38:14 44:8,14 55:19 56:1,7,17 57:19,20 58:4 58:8,17
involvement 24:10,19 25:13 26:5 29:22 37:6 38:7 55:18 58:20
issued 12:17
issues 8:19 45:5 51:18 52:2,3

j

janice 1:12
january 75:3
jefferson 14:17 18:21 19:1 24:6 26:1
jennesa 4:4 7:13
job 33:8
jobs 32:6
joined 43:10
joining 17:20 43:6 45:3
justice 65:23 66:4,7,9

k

katie 1:11
keep 14:21 15:2 46:17 61:17,19
kept 64:10,14
kin 74:14
kind 26:23 57:12 58:9 60:9
king 33:3
know 8:7 9:9 9:23 11:10 12:16 14:5,6 20:11,15 25:12 39:6 44:13 45:19,21 46:6 48:14 49:21 50:1 57:18 61:11 62:7,11 64:4 65:15,18 66:18 67:3 71:14 73:1
knowledge 16:14 40:15 60:23

l

l 2:1
lack 64:10,13
laptop 10:13 11:7 48:4
large 2:7 5:3 14:2 74:20
lasted 29:16
law 6:21 31:17
lawsuit 13:9,23 16:6,8 17:21 38:14,17 40:7 40:12 41:8,11 42:20 43:3,6 43:10,14,16,19 43:20 44:8 45:3 46:12 51:18
lawsuits 16:12 42:19
lawyer 17:10 17:14 20:19 44:12,17
lawyer's 20:13
lay 57:6,10
layman's 56:23 57:6,9,13
lead 31:16
leadership 24:23 36:20

56:6,9,10
leading 70:19
leave 33:4
legal 75:23
legislator 51:16
legislators 51:21
legislature 40:18 51:15 52:7
level 21:21 24:19 25:12 26:5
licenses 22:21
life 19:21 22:18 53:8
likely 8:19
likewise 9:12
limited 72:19
limits 72:16
line 76:4,7,10 76:13,16,19
lines 61:15
listed 21:6
little 15:7 16:15 21:19 28:6 31:19 34:8 36:17 39:11 41:16 44:7 45:8 50:2,18 51:13 54:2 56:4 58:16 59:1 60:1,8 64:21 65:6 66:14
live 19:19,22 52:21 53:3,21 54:14
lived 19:4,6,8 19:12,16,21 22:17
llp 4:9
local 45:16 57:10
located 22:13 58:13
location 33:13 58:14
lofton 54:8 55:10,22 56:8 56:18 57:20
long 19:3,17 22:4 27:23 28:3,8 29:17 32:19 36:10 54:16,18 55:13 55:14
look 10:15,17 10:18
looks 15:7
lost 67:7
lot 18:18 67:23 71:11
loud 49:19
loudly 9:1
louisville 33:14 71:6,14 72:11

m

machine 32:9,9 32:10,14,19 33:20
madam 48:12
made 17:20 32:17 44:10 77:5
mail 10:12,22
maintaining 25:20
maintenance 34:2
majority 62:12
make 7:1,10 9:10,16,18 10:11 31:5 32:2
makes 41:3
making 53:8
mallory 2:5,15 5:1 74:18,19
manage 30:11
manager 30:6,8 30:21
managing 30:13
manufacture 32:15,16
map 42:3,12
maps 40:18,22 42:22 43:8,9 43:16,21,23 44:4 51:14
marked 11:16 11:22 46:23 47:3 48:21
marshall 74:3
masons 24:5
master 25:2,3
matter 6:22 34:8 40:11 44:11 48:22 49:2,6
matters 16:13
mean 23:20,21 41:22,23 43:23 53:6,7 61:20 61:22
means 52:17 74:6
meant 45:23
media 10:22 40:17,21 45:16
medical 15:1
medications 14:20
meet 24:2 26:7 26:9
meetings 52:11
melton 65:23 66:4,9
member 23:16 24:13 25:1 36:8,11 37:13 37:23 54:10 56:2,23 57:5,9 57:19

members 1:8 16:12 57:15 61:2
mentioned 14:9 15:12 19:14 23:3 25:23 33:15 39:2 50:19,22 54:6 55:10 71:23 72:10
messaging 10:22
methodist 1:10 54:8 55:5
miles 54:15 55:9 71:6 72:16
minority 61:2 67:13
minute 68:7
money 53:15 67:23
month 24:20,21 24:22 26:12 59:10
monthly 59:11 59:12
moved 20:1,1
moving 13:4 16:15 23:14 27:3 38:10 51:13 64:8 72:9
multiple 29:15 45:10,11,13

n

n 2:1 3:1 4:1
naacp 24:5 25:9 28:12 29:5
name 6:20 7:3 7:5,12,15,18,21 14:7 18:14 20:17 34:4 54:7 66:2
national 45:16
nature 10:20 13:19 14:9 44:11
near 19:19
necessary 77:6
need 9:22 10:14 10:17 31:9 46:16 53:15,19 72:11
needs 7:10 67:13 68:1
neighborhood 54:3
neither 62:23 74:13
never 37:12 43:2
new 31:23
news 40:17,21 45:6,9,10,16,16
nod 9:4
nods 13:15
nonprofit 1:7 1:11
north 18:18
northern 1:2
notary 2:6 5:2 74:21 77:13,19
note 75:10
noted 77:7
notes 18:10
notice 3:14 12:16
noticed 8:18
november 35:13
number 1:5 47:22
nw 4:6

o

o 2:1
object 70:18
objection 9:16 9:18 39:10
objections 5:20
obstacle 71:10
obstacles 70:14 70:22
obviously 10:14
occur 29:10 33:11 54:23 62:22
occurred 62:15 62:20 65:13
occurring 20:8 29:15 63:3 72:4,7 74:11
office 20:13 32:2 63:5 65:3 65:16,19
official 1:17 14:1
officials 53:10 53:12
oh 25:17 39:12 58:2
okay 6:13 13:3 14:18 20:17 29:17 44:19 47:12,20 48:1 48:10 49:23 68:10,13 69:19 69:23 71:17 72:22
once 13:13,14 16:19 18:13 24:19,20 26:11 26:14,15 29:14
ones 67:20
open 10:9 11:1 11:1,7
operator 32:9 32:11,14,20 33:21
opinion 62:3 67:14 70:13
opportunities 42:16 59:22 60:3 64:10
opportunity 42:1 43:13,17

oral 2:17 5:9
organization 1:8,11 24:11 24:12,15 25:1 25:8,13,21 26:6,19 57:1,6 57:7,9,11,13
organizations 23:14,17 24:2 27:4,6,10,13,16 28:7 37:2 54:11
original 2:17
ossoff 63:5,10 63:15
outcome 16:5
outside 59:2
overlooked 67:22
own 20:23 21:2
owned 21:11 34:2
ownership 21:3

p

p 2:1 4:1,1
page 3:3,13 47:14,14 49:11 49:12 76:4,7 76:10,13,16,19
paid 46:7,10
pandemic 60:5
paragraph 47:13 49:10,14 49:18,21 50:3 50:6,9,12,19
parkwood 4:10
part 57:4
partially 20:23 21:2,12
participate 54:3 56:19 57:1 59:6 60:3
participated 37:7
participating 14:22 15:3 60:20 64:8,11 64:14
participation 46:11 61:3
parties 2:3 74:14
parts 32:15,16 32:17
party 36:8,12 36:21 37:3,8 37:13,16 38:2 38:2 41:23 67:4
past 19:9 21:20 25:2,3,14 27:5 27:17 29:1 70:15
pastor 56:16,16
paying 46:3
pennsylvania 4:6
people 38:20 61:15,23 65:16 65:19 70:14,22 71:3,11,13
percent 63:1
perfect 12:3 47:12 68:11
period 19:17 29:16,18
periods 28:19
personal 60:23
personally 45:4 46:9 62:7 65:8
personnel 23:9
pertaining 52:3 52:7
phi 1:7 7:6,14 7:19,23 75:4 76:1 77:1
phil 1:12,22 2:4 5:8,16 6:15 7:7 18:15 49:15 75:5 76:2,24 77:2,4,12
phone 10:11,21
phrase 8:12 39:14 52:14,16 61:6,8,10,11
place 20:12,18
plaintiff 15:13 43:5 46:12 49:14
plaintiffs 1:13 4:3 7:7,20,23 15:16
please 2:20 8:7 9:23 10:4,11 18:13,23
plus 63:1
point 44:9
polarized 61:12 64:23
political 27:6 38:1,4 60:20
politics 64:11 64:15
poll 30:6,7,11 30:13,21 71:4
polling 72:18
polls 72:1
poorly 8:13 30:18
posed 10:3
position 31:11 32:5 38:1 56:9 56:11,13 66:6
positions 36:18 36:20
precinct 35:14 35:15,17,18,19
prefer 11:8
preferred 67:6 69:15,20
prepare 17:17 18:5
present 43:17
presently 20:20 54:10
preside 26:21
president 25:14 57:10
presidential 35:6

presume 8:9 35:22
pretty 22:16
previous 27:15 43:9 44:19 50:3 70:2
previously 37:6 41:8 42:21 43:14,16 45:5 46:23
primary 35:6 66:23
prince 24:5,9 28:10,22
prior 13:8 22:7 31:18 32:4 35:23 40:3 41:11,11 42:12 45:3 64:22
privilege 39:11 39:18
pro 56:12,15
probably 30:18 37:22 44:23 55:16 59:11
problem 47:17
procedure 2:14 5:5,19 32:1
proceeding 74:5
proceedings 5:11 74:11
process 51:14 60:20 61:4 63:2 64:1,5,9 65:1
produced 74:7
production 3:16
professional 22:21,23
prohibited 60:16,19
properties 20:22 21:3,13
provide 8:15 20:8
provided 13:20 37:11
providing 9:17 18:7 53:7
public 2:6 5:2 65:19 74:21 77:19
pull 47:9 48:3,4
pulled 48:20
pulling 47:18
purpose 5:18 8:11
purposes 5:18
pursuant 5:4
put 47:7

q

qualifications 62:2
qualified 65:4
quarter 26:14 26:15
question 5:21 8:6,10,14 9:10 9:11,13,15 10:3,3 23:23 25:11,16 26:4 30:17 40:2 44:3 56:3 65:5 70:18 71:23
questioning 68:3,21 69:7 72:23
questions 8:4 13:6 31:8 39:14,21 46:18 60:12 68:4,23 69:6,8,12 70:1 70:8 71:16,19 73:5
quick 71:18
quickly 14:19 49:20 60:14 70:17
quite 59:8

r

r 4:1 76:3,3
race 60:17,21 63:21
races 61:17 63:11,14
racial 61:15 65:10
racially 61:12 64:23 65:2
racials 64:18
raffensperger 1:17 5:17 75:4 76:1 77:1
rahul 4:5 7:5 38:15
raised 51:18 52:2
ran 66:19 67:3
raphael 62:16 63:17 66:12 67:7
rather 48:5
reach 51:16
reached 51:20
reaction 40:21
read 49:17,19 49:20 75:9 77:5
reading 2:11
ready 11:18 46:17
real 15:10 24:8
really 20:11 23:18,19 73:7
reason 43:15 75:11 76:6,9 76:12,15,18,21
reasons 40:5
recall 13:19 14:3,16 15:15 15:19,21 16:8 16:10 17:1 19:23 22:1 23:5 29:11,12 29:17 34:4,13 35:13 36:13 37:19,21 44:16 45:15 51:8,19

51:20 62:14,19 63:2,20 65:12 69:15,19 70:1 70:7
receipt 75:18
received 3:16 23:11 46:10
receiving 53:19
recent 35:13 43:7 63:16 66:11 69:9,12
recently 29:12
recess 68:18
recognize 12:13 50:5
recollection 17:23
reconvene 68:17
record 7:2,4,11 9:19 11:14 18:14 48:13,15 48:17 68:5,16 68:20 70:18 73:11
redistricting 40:10 41:12 43:7 45:10 51:17 52:4,8 52:11
redrawing 42:12
redrawn 40:18 51:14
referenced 75:6
reflected 12:23
refresh 17:23
refrigeration 32:17
regarding 10:21 12:18,19 70:9
regardless 62:1
register 34:14
registered 34:10,18,21 35:3
registering 60:16
regular 26:8 54:21
regularly 24:2 26:10 55:2
regulations 31:23
related 16:13 61:3
relates 50:12
religious 59:3,4
remember 13:17 14:7 54:18 55:13 69:11
repeat 18:23
rephrase 30:17 40:2 56:3
report 45:9
reporter 2:6,21 5:2 8:20 9:1 18:22 19:2 32:10 48:13 57:3
reports 45:10 45:16
represent 7:6 38:17 53:16
represented 67:8
representing 7:14,19
represents 74:9
republican 37:13,20 62:9 66:19,21,22 67:4
requesting 10:4
require 31:22
required 77:13
requirement 62:12
requires 31:17
research 45:4
reserve 6:9,11
reserved 5:23
reside 50:19,20 51:6
residents 67:15
residing 1:8
resolved 15:21
respective 2:3
response 5:21 12:7
responsibilities 25:5,18
responsiveness 5:22
result 74:16
retained 2:21
retired 33:5
return 75:13,17
reveal 39:22 44:11
review 17:19 75:7
reviewed 17:16
reviewing 17:22 18:4
right 11:17 15:6 25:9 29:20 38:10,10 38:22 39:1 46:20
role 25:6,18 26:16,18,23
roles 24:23
room 11:12 20:20
rpr 2:5
rule 2:13
rules 2:14 5:5 5:19
run 65:16 66:21
running 31:6 65:2
runoff 35:16 63:8,11,16
rural 52:22

s

s 2:1,1 3:11 4:1 6:15 49:15 74:18 76:3
safe 16:4
saith 73:13
sand 55:5,15 57:17,21
satisfied 41:13 41:17 42:11
saw 45:9
school 16:3 21:23 22:8,11 22:12,13,14 57:2 58:17
scj 1:5
screen 10:15,17 11:21 12:1,6 12:12 46:22 47:5 48:6
scroll 12:8 49:9
scrolling 12:5
se 4:10
second 9:3 26:23 47:11 48:2 58:4
secretary 1:18 5:17 32:2 42:19,21 43:6
see 10:9 11:23 12:4,4,8 46:16 48:6 49:13 61:9
seen 49:4 65:8
senate 50:20 51:3,6,9 62:16 63:4 67:9 69:9 69:12,16,20
senator 63:5,5 63:9,9,15,15,19 63:20 66:12
sent 75:14
series 8:4
served 36:23
service 24:17
services 54:17 54:22 55:12,15 59:3 64:14
session 51:17 51:22
set 31:5
settled 14:5
seventy 19:5
several 45:14
share 10:18 46:22 48:6 59:23
shared 12:14 13:1
sharing 11:20 12:11 47:6
sheet 75:11
shift 15:6 21:18 34:7 46:15 64:21
shifting 17:8 18:12 20:22 25:22 27:12 28:6 29:20 32:4 44:7 54:2 57:17 58:16 60:8
short 68:18
showing 12:1
sic 51:11
sign 38:20,22 75:12
signature 2:11 6:6 74:18
signed 41:7 45:22 46:1 75:20
signing 40:3 45:19
silenced 10:12
similar 13:10 43:15 49:5 61:7 63:2
similarly 9:15
sir 6:20 18:22 72:5
sitting 73:9
situation 30:16
sixth 1:9
slating 64:1,5
small 52:22
social 10:22 23:16,21
socialize 58:22
solutions 75:23
sorry 7:16,17 11:6 18:22 25:17 47:16 48:14 56:3 57:3
sounds 6:13 68:9,13,14
southeast 75:15
speak 8:23 9:8 53:16 54:1 73:8
special 35:10 51:17,22 62:14 62:19 66:12
specific 33:12 38:8 42:6,12 43:15 44:3,5 53:22 56:5 59:3,4 60:10 65:12 72:3
specifically 37:2 38:12 42:18 45:22
ss 74:2
stand 70:20
stanley 18:15
start 11:19 13:5 28:22 38:11 69:8
started 36:14 36:16
starts 47:13 49:10,14
state 1:18 2:7 5:2,17 16:9 18:13 31:17 36:2 42:20,21 43:7 44:1 50:20 51:3,6,9

53:14,19 67:23 69:9,12,16,20 74:2,20
state's 32:2
statement 17:20,22
states 1:1 62:16 63:4 67:9
stenographic 74:6
stephens 20:5
steward 56:12 56:15
stewart 1:12
stipulated 2:2 2:10
stipulation 5:6
stipulations 6:2
stop 9:17 12:11
stopped 29:8
straight 47:18
street 20:5 21:10
strike 15:10 21:1 26:17 30:20 40:5,9 45:2 50:9 70:12
subject 34:8 40:11 44:11
subscribed 77:14
succeed 51:3,11
suit 15:17
suite 4:10
sunday 57:1
supervision 74:8
support 26:20 37:16 41:4
supreme 66:1,7
sure 8:6 9:5,10 9:16 10:11 23:21 31:5 32:3 52:18 66:10 67:1
surrounding 44:14
surviving 53:4 53:5
sworn 5:13 6:14,16 77:14

t

t 1:11 2:1,1 3:11 76:3,3
tactics 65:2,10
take 9:22 10:2 10:5 50:16 68:6
taken 2:5,18 5:16 14:20 74:5
talk 21:19 27:16
talked 27:12
talking 30:2 38:11 41:21 42:2,3 43:22 53:18
tasked 25:20
taylor 4:9 6:21
technical 21:23 23:3 31:9
tem 56:12,15
term 63:23 64:17
testified 6:16 72:20
testify 18:1 52:1
testifying 20:9
testimony 1:21 2:17 13:5,8,20 18:6 37:10 50:3 72:9 75:9 75:18 77:8
text 10:22
thank 11:4 13:3 14:18 19:2 20:6 47:15 48:18 50:14,15 69:2 71:15 72:22 73:6,9
thermo 33:3
thing 10:1
things 8:22 24:14
think 8:1 37:22 40:23 41:19 48:16 50:16 53:4,11,14,21 57:3 61:16 64:23 65:4
thriving 53:4,6
time 8:4 9:23 12:19 13:17 19:11,17,20 23:10 28:18 29:16,18 31:10 31:13 33:7 36:15 38:23 39:9 41:6,8 42:17,17 59:21 59:21 60:14 65:14 73:8 74:12 75:19
timeframe 75:8
times 13:12 16:18 29:15
today 7:8 18:1 18:10 73:8
today's 14:22 15:3
together 57:23
told 44:18 62:8
touched 27:4 36:17 50:1,17 66:13
town 72:16
train 57:15
training 23:4,6 23:9,11 31:18 31:21
transcript 2:17 3:16 74:7,10 75:6,20 77:5,8
transition 30:2

transportation 71:12
treasurer 25:15
trial 5:23 13:9 14:4 15:19
true 74:10 77:8
truthfully 14:21 15:3
try 23:22
tsai 7:21,22
turn 52:13 69:1
turning 43:19 45:8 66:11 67:2
twelve 28:5
twenty 28:15
twice 24:21,22 26:12 59:9
two 19:9 21:15 57:23
type 23:5 31:21 45:21 59:4 65:10
types 18:6 24:14 60:2
typical 30:12 30:15
typically 58:22

u

u 2:1
uh 9:5
under 5:19 29:2 74:8
understand 8:5 8:10,13 12:22 18:5 67:10
understanding 52:16 72:7
understood 39:19
unfair 40:22 41:1
unique 53:22
united 1:1 62:15 63:4 67:9
units 32:18
ups 71:18 73:2
use 5:23 65:1
used 64:18 75:20
uses 62:11
usually 58:23

v

v 1:15 75:4 76:1 77:1
valley 55:5,15 57:17,21
value 46:10
verify 75:9
veritext 75:14 75:23
veritext.com. 75:15
vice 26:7,16,19
virtual 8:17 10:7,16
virtually 20:8
visible 11:8
visual 8:19
vote 34:11,14 34:18,21 35:3 35:17 50:20 60:16 61:15,23 62:4,12 63:13 63:18 71:7
voted 35:2,12 35:14 36:1,5 37:19 50:22 51:2,9 62:8
voter 38:8
voters 30:23 31:7 62:3,8 71:10
voting 34:9 36:14,16 61:12 64:23 70:14,23 71:5,9 72:10 72:12,19

w

wait 9:11,12
waived 2:12
walker 62:17 63:18 66:13,18 66:22 67:9
want 6:9 27:5 44:4,13 48:3
wanted 11:6,10 46:15 69:7 73:2
warnock 62:16 63:5,9,15,17,19 63:20 66:13 67:7
washington 4:6
way 18:3 39:14 41:2 72:19
ways 57:16
we've 21:15 37:22 64:22
week 24:19 33:9
weekly 59:9
weigel 2:16 3:4 3:6 4:9 5:15 6:5,9,13,19,20 6:23 7:9,17 8:1 11:5,11,17 19:3 32:13 39:12,14,16,19 39:20 46:14 47:4,12,20,23 48:8,12,16,19 50:15,17 57:8 68:2,8,11,14,19 69:11 70:1,8 70:17 71:17,21 72:22 73:6
weigel's 69:6
went 14:3 15:19
white 61:23,23 62:1 67:15
williams 75:1
wilmerhale 4:5 7:22
wilmerhale.c... 75:2

win 66:22
winning 61:18 61:20
wish 6:5
witness 2:12 5:9,13 6:14 13:15 15:12 19:1 32:12 57:5 70:19 75:8,10,12,19
won 63:10,21 69:16,20
woods 1:11
work 30:5,7 32:7 33:9,11 33:17 34:5 57:23
worked 38:4
worker 34:2
workers 30:22 31:4
working 47:6
would've 67:8
wrens 18:18 19:22 20:5 21:10 22:14,14 22:17 27:22 30:9 34:15 35:15 71:13

x

x 3:1,11

y

yeah 39:12 47:12,17 68:8 68:8,8
year 26:12
years 13:18 19:5,9,14 28:2 28:5,11,13,15 29:1 32:21 33:16 55:16 67:21

z

zoom 2:7 5:7

Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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

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

1 Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
2 Phil Brown (#5618951)
3 ERRATA SHEET
4 PAGE 51 LINE 5 CHANGE 2022 Should read
5 2020
6 REASON Because we was discussing the 2020 Election
7 PAGE 71 LINE 5 CHANGE Know to louisulie
8 Should read Go to Louisville
9 REASON Because I wanted them to know most people dont go to Louisville
10 PAGE ____ LINE ____ CHANGE ____
11 ____
12 REASON ____
13 PAGE ____ LINE ____ CHANGE ____
14 ____
15 REASON ____
16 PAGE ____ LINE ____ CHANGE ____
17 ____
18 REASON ____
19 PAGE ____ LINE ____ CHANGE ____
20 ____
21 REASON ____
22
23 Phil Brown 08 feb. 2023
24 Phil Brown Date
25

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
Phil Brown (#5618951)

ACKNOWLEDGEMENT OF DEPONENT

I, Phil Brown, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.

Phil Brown 08 Feb 2023

Phil Brown Date

*If notary is required

SUBSCRIBED AND SWORN TO BEFORE ME THIS 8th DAY OF February, 2023.

ELIZABETH PADGETT NOTARY PUBLIC Comm. Exp. 11/30/26 JEFFERSON COUNTY, GA

Elizabeth Padgett

NOTARY PUBLIC