EXHIBIT I

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:
Eric Woods
December 15, 2022

you please state your full name for the record?

A. Eric T. Woods.

Q. And, Mr. Woods, what is your current address?

A. [redacted] Tyrone, Georgia [redacted].

Q. And what county is that in?

A. Fayette County.

Q. How long have you lived at that address?

A. Going on 15 years now.

Q. And have you lived at any other address in the past two years?

A. No.

Q. Before moving to your current address 15 years ago, where did you live before that?

A. I was in Jonesboro, Georgia.

Q. And how long did you live in Jonesboro?

A. On and off for about maybe seven years. I was -- I was stationed at Great

1 certifications.
2 Q. Okay. That was a little bit of a
3 vague question. Sorry about that.
4 And right now, do you receive
5 continuing education in any area?
6 A. Yes.
7 Q. And what is that?
8 A. It would be Homeland Security
9 exercises, plans and exercises.
10 Q. And how often do you receive
11 continuing education in that area?
12 A. Annually.
13 Q. Annually.
14 And where do you receive that?
15 A. Online.
16 Q. And, currently, we -- we covered it
17 a little bit, but just to confirm, aside from
18 what we've already discussed or talked about,
19 do you currently receive training in any
20 other field or area?
21 A. No.
22 Q. All right. We'll move along to talk
23 about any organizations you're currently

and polling.
Q. And how about where you voted for the runoff; same place?
A. No, they -- it was a switch. So the runoff was at the old Tyrone police station, which is about a 50-year-old building with no running toilets.
Q. We touched on this a little bit with registration, but have you ever voted in any other state?
A. I'm going to say no, to give you -- I'm going to say no.
Q. And do you consider yourself to be a member of the Democratic party?
A. Yes.
Q. And for how long would you say -- consider yourself to be a member of the Democratic Party?
A. Since I was 18.
Q. Have you ever held any leadership positions in the Democratic Party?
A. No, sir.
Q. And have you ever held any position

or served on any committee for the Democratic Party?

A. No, sir.

Q. And have you participated in any activities of the Democratic Party?

A. I'm sorry. You faded out again. Could you --

Q. Yes.

Have you ever participated in any activities for the Democratic Party?

A. Yes.

Q. And could you just describe briefly what those activities have been?

A. Yes. Voter registration.

Q. And how often would you say you participated in those activities?

A. Maybe every other election. There were several where I was deployed, so...

Q. And I presume, based on your prior answer, that this will be in the negative, but have you ever considered yourself to be a member of the Republican Party?

A. No, sir.

Q. And would it be fair to say that you generally support Democratic candidates for election in Georgia?
A. Yes, sir.
Q. Have you ever voted for a Republican candidate?
A. No, sir.
Q. And, again, you probably answered this with your prior answers, but have you ever been a member, held a position, in any other political party?
A. No, sir.
Q. Have you worked on any political campaigns?
A. If you mean have I passed out flyers for prior Democratic presidents, yes.
Q. Yes, so for a specific candidate that you could point to and say, I helped on that campaign?
A. Yes, the Obama campaign.
Q. And would that have been in both -- both elections that he ran?
A. Yes.