EXHIBIT K

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

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

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. 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?

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