EXHIBIT G

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

Georgia State Conference of the NAACP; Georgia Collation for the People's Agenda, Inc; Galeo Latino Community Development Fund, Inc.,

Plaintiffs,

vs.

CIVIL ACTION FILE NO. 1:21-CV-5338-ELB-SCJ-SDG

STATE OF GEORGIA; BRIAN KEMP, IN HIS OFFICIAL CAPACITY AS THE GOVERNOR OF THE STATE OF Georgia; Brad Raffensperger, in his official capacity as the secretary of State of Georgia,

Defendants.

VIDEOTAPED HYBRID ZOOM
30(b)(6) and 30(b)(1)
DEPOSITION OF
BONNIE RICH
January 18, 2023
9:11 A.M.

18 Capitol Square SW
Atlanta, Georgia

Lee Ann Barnes (via Zoom), CCR-1852B, RPR, CRR, CRC

than your conversations with your attorney?
A. That and when members would come up and tell me that they liked it.
Q. And so do you have any understanding of what changes were made between the November 2 map and this map?
A. Again, it may have been the individual legislator input. I just do not remember. Seems like we were trying to continue to tweak the map, and I think we may have unpaired two Democrat candidates, is what I seem to recall.
Q. Did you review this map to see whether it complied with the Voting Rights Act?
A. I asked my lawyers if it did and they said that it does -- that it did.
Q. Did you ask anyone else?
A. No.
Q. Did anyone else offer an opinion on that to you?
A. No, I don't think anybody else really would have been qualified to do that.
Q. Did you view preserving or creating competitive districts as a goal for the State House map?
A. I'm sorry?

Q. Okay. Do you know why preclearance might come back into play?
A. I do not.
Q. Okay. I'm going to ask you now to go to page 7 that's identified on the bottom by -4306.
A. Okay.
Q. And if you look at the middle bullet, could you read that aloud?
A. "Prohibition on using partisan data: Line drawers, whether they be commissioners, non-partisan staff or legislators are prohibited from using" -- sorry, I looked away -- "incumbent residences, election results, party."
Q. Was partisan data relied on during the redistricting process?
A. It's my understanding that it was.
Q. Was any of this particular partisan data?
A. I don't know what -- oh, I do know we relied on incumbent residences. I don't know that that was considered partisan, but that was something that both parties submitted, their incumbent's addresses to be considered.
Q. What about election results?
A. I believe so, yes.
Q. And party?

A. I did.
Q. And I believe you said earlier, the Democratic members except for a handful of them didn't show up for meetings or try to meet with you.
A. Correct.
Q. And there was a portal that was made to receive public comments as well?
A. Yes, that's correct.
Q. And you received, I guess, hundreds of comments at that portal?
A. I think at last count it was in the 900s and I thought it went over 1,000.
Q. And all those were made available to members to review; right?
A. Yes.
Q. And you -- you reviewed those comments, as you said?
A. Yes, I did.
Q. And we had some discussion about the education data the committees hold.
Do you recall inviting a variety of different groups interested in redistricting?
A. I did.
Q. In both political parties?
A. Yes, both parties.

Q. And the National Conference of State Legislatures?

A. That is correct.

Q. And the guidelines for the committee were adopted after that educational process; is that right?

A. That is correct.

Q. In the map drawing process, I know you talked about you primarily did that in the Reapportionment Office with Ms. Wright or with Mr. Knight; right?

A. Correct.

Q. Was political data generally displayed as you looked at different districts?

A. The political data, if you mean the election results, yes.

Q. And so it's fair to say you were aware of the partisan impact of district lines and you looked at various drafts?

A. Yes.

Q. When you held the committee meetings during the special session, did you generally receive public comment at those meetings as well?

A. I -- I did not at the very first meeting where Leader Beverly and I both presented our maps