EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF NAACP, et al.,	)	No. 1:21-CV-5338-ELB-SCJ-SDG
Plaintiff,	)	
vs.	)	
STATE OF GEORGIA, et al.,	)	
Defendant.	)	

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE
(MS. GINA WRIGHT)
January 26, 2023
9:17 a.m.
18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

point, but I don't recall a specific e-mail with him.

Q The same reasons why you didn't really e-mail the Congressional map?

A Yes.

Q Okay. Do you -- did -- I think you told me that Chairman Kennedy provided you with specific instructions about how the lines of the map should be drawn?

A Say that one more time. I'm sorry.

Q Sure.

Did Chairman Kennedy provide you with specific instructions about how the lines of the State Senate map should be drawn?

A No.

Q Did you receive any specific instructions about how the lines of the State Senate map should be drawn?

A Initially, no.

Q How did you make a determination about how to draw the lines for the State Senate map?

A That was a -- basically a -- call it a blind map, but it was a map, just a starting point map to address the population changes in the state and make adjustments to the districts as they were, to try and have a starting point, a discussion map to -- to start with.

you about Mr. Tyson's role?

A I believe so.

Q So Mr. Kennedy -- pardon me. Chairman Kennedy sees the blind map, and then what happens? Does he direct you to make changes to it?

A That being a starting point map, then yes, we began to work within it to make adjustments for whatever requests people wanted to try and modify the map, however he wanted to try to best accommodate requests and things that were brought to him.

Q And you had a lot of conversations with him?

A Yes.

Q A lot of conversations about modifying the blind map?

A We did have conversations about modifying it, yes.

Q Were those conversations ever in person?

A Yes.

Q Were they mostly in person?

A Yes.

Q When you had those conversations, was the map projected onto a screen?

A Not necessarily.

Q But sometimes?

A Sometimes.

Q When you had the conversations when the map was projected onto the screen, was it within Maptitude?

A If I'm looking at the map, it would have been in Maptitude.

Q Okay. And you know how to use Maptitude?

A Yes.

Q Was data projected onto the screen?

A Sometimes it may have been. Not all the time.

Q Why would you look at a map without any data related to it?

A You are just reviewing the geography. You wouldn't necessarily be looking at the data. You are looking at the composition of districts, the counties, precincts and things.

Q When data was projected onto the screen, what type of data was it?

A Typically, our data would include the total population, the deviation, the percent deviation, voting age population. Most of the fields that you see on our population summary reports would be also included on there, as well as political data.

Q I recall that there's data related to the race of the population on those summary reports.

A Correct.

Q Was data related to the race of the populations

projected onto the screen?

A It could have been sometimes.

Q Most of the time?

A Most of the time. We usually projected all the race data that we would use on the reports, as well as the political data that they were reviewing. So both together.

Q Was that data relevant to you making -- I'll rephrase.

Did Chairman Kennedy consider that data when making instructions about how to draw the lines?

A I would assume he did. I don't know what Chairman Kennedy considered.

Q Was it sort of a collaborative conversation or was it really just Chairman Kennedy giving you instructions and you following them?

A Can you explain what you mean by that?

Q Yeah. I can imagine that Chairman Kennedy told you you need to move this line in southeast Georgia and then you did it. Or Chairman Kennedy could say, what would happen if I moved -- you moved this line in southeast Georgia? You could say, well, Chairman, this or that.

A I'd say it's more like the second scenario.

Q Okay. What type of questions did he ask you?

Kennedy, Mr. Tyson and Ms. Paradise and other senators?

A The changes, I think, came at the request of the senator, and then Chairman Kennedy authorized to try and see if we could do what he had requested.

Q At the request of the senator, what senator are you referring to?

A Senator Rhett.

Q So there was the map that was published first?

A Uh-huh.

Q And then Senator Rhett requested changes?

A Uh-huh.

Q And as a consequence of that, you made changes?

A Yes.

Q And then another map was published?

A Yes.

Q Were there any other changes requested?

A I cannot recall. That one stands out. I remember doing that one. I don't recall if there were others in that draft.

Q Why does it stand out?

A I have drawn a lot of maps, so...

Q Yeah. So why does that one stand out?

A Because in committee, I remember there was discussion over the change, that that was in the committee meeting, so that one sticks out. That may have

been the only one that went into that final version because other -- other changes might have gone into the other version, the first presented version before we got to that, but there were members, you know, putting changes in.

That one just jumps out at me. That may have been the only one that went into that last version.

Q Did you speak with anyone else in addition to the people you referred to for any reason about the State Senate map?

A I probably spoke with a lot of senators regarding that map.

Q Right. Right. Okay.

A So I don't want to list all 56 of the members --

Q Yeah.

A -- that were here then, but I spoke with a lot of members at that point, from the time -- especially when the map was made public, those that requested things.

Q Did you speak with anyone in the House about drawing the State Senate map?

A I don't think so.

Q Did you speak with anyone outside of the General Assembly about drawing the State Senate map?

look like?
A There was a lot of input everywhere.
Q And it was hard to look at all of it?
A Yes.
Q Right. You weren't able to look at all of it?
A I looked at a lot of it but not all of it.
Q Yeah. There was a lot you didn't look at?
A I don't know that I'd say there was a lot I didn't look at.
Q Okay.
A But I did watch or attend every public hearing.
Q Okay. We have just been talking about the State Senate map, and you described a blind -- I'm going to call it a blind map process. Does that make sense if I said it that way?
A Sure.
Q Yeah. I should back up. What was your role in drawing the State House map which Governor Kemp signed into law?
A It was the same as the House, or as the Senate and Congressional.
Q Okay. And did you use the same blind map process to draw the State House map?
A Yes.
Q Was Brian Knight involved at all in drawing the

Q Well, so -- sure. Let me rephrase.

You referred to having a working session with Chairman Kennedy, Mr. Tyson, Ms. Paradise about the State Senate map. Am I recalling that?

A Right. Well, we would have had several meetings where we discussed the map. There wasn't one session where we had other multiple senators involved at the same time that I recall. So the Senate was a little different in that respect.

Q You met with Chairman Rich regarding the State Senate map?

A Yes.

Q Was it the same type of process that you had with Senator Kennedy, where you had a blind map and then you reviewed it with her?

A Yes.

Q And then she, as the sponsor of the map, would either direct you to make changes or bring in other members of the House who would make directions for changes?

A Yes. It was my understanding both chairmen were meeting with members and had opened up office time and meeting time to take input from the members about the map and their districts. And I don't know how many members each of them met with, but they did have those

meetings and that frame of reference. So that when we met together, they could use those meetings and the input they received from members to make adjustments if the -- if the draft didn't look -- if they felt like this member had requested this and we weren't -- if we could accommodate things, we would try to accommodate those things.

Q But you weren't involved in those meetings?

A I was not.

Q Was anyone in your office involved in those meetings?

A No.

Q You just knew they existed?

A Right.

Q Would Chairman Rich mention them to you?

A Yes.

Q Sometimes specific meetings?

A Maybe.

Q Yeah.

We've been going about an hour, I think. Would this be a good time to maybe take a 15-minute break?

A I'm -- whatever.

THE WITNESS: Patrick?

MR. JAUGSTETTER: Sure.

MR. CANTER: Thank you.

received directions from -- sorry, I'll rephrase.

You mentioned earlier that with regards to the Senate map, you received directions on how to draw the lines from -- either directly from Chairman Kennedy or through Chairman Kennedy from other senators. Is that basically right?

A Yes.

Q And it was the same process with the State House map but with Chairman Rich, not Chairman Kennedy?

A Yes.

Q What was your process for receiving directions on how to change the lines with regards to the Congressional map?

A Well, I think we talked about the meeting, jointly meeting with them, so same type of thing. Input from whatever they had, conversations or whatnot. There were also considerations, of course, from things we had heard from public hearings and other things to try and incorporate into those maps, so those decisions were made in coordination with all of that together.

Q Did you use a blind map for the Congressional map -- sorry, let me rephrase.

A Yeah.

Q You mentioned -- that's fair.

You had mentioned creating a blind Senate map

same thing?

A Right. The fewer the splits, the easier it would be for them to assign voters, especially under a compressed time frame.

Q Got it. I understand that's especially the case with precinct splits?

A Yes.

Q As part of your analysis of the maps, what did you do to confirm that they were in compliance with the Voting Rights Act?

A So compliance with the Voting Rights Act is a legal opinion, so my work on drawing the map would create -- try and maintain districts that we had previously had that were districts that had been majority-minority population districts. We try not to reduce the number that we had before, and I would try to make sure that what we were drawing, to the best of my ability, continued that, if possible, but then I would also ask them to have those reviewed by counsel for that compliance.

Q So would it be fair to say that as a nonlawyer, you tried your best to ensure compliance, but ultimately that wasn't a determination you were making?

A True.

Q Okay. And the way you tried your best was to

Q So is there racial data at the block level?
A Yes.
Q All right. Is there any other type of demo -- data at the block level?
A So when we build our precinct layer, we do allocate the election data to the block level, so we have that political data at that level. It's estimating, based on the demographics in there, based on registered voter demographics kind of corresponds the two and allocates down to that level. So we do have estimate political data at the block level when we do this.
Q When you are drawing a map and you are looking at the block level --
A Uh-huh.
Q -- is data reflected on the screen?
A Yes.
Q And is the estimated election data on the screen with the other data?
A Yes.
Q You agree that the line we're looking at here splits through the precinct, right?
A At the time, Newton County was considering precinct changes. We were working with several -- their elections office, and we had a draft precinct layer that they were considering, so it's possible that I referred

Q Yeah. Okay.

And then Chairman Rich came and provided direction, either directly to you, or Chairman Rich spoke to other members of the House and they provided direction to you through Chairman Rich?

A Yes.

Q Am I missing anything about people who provided direction to you about how to draw this House district?

A I'm not sure what you mean.

Q Are there other people that directed you on how to draw the House plan that I haven't mentioned already?

A Counsel was involved in consulting on -- on the drawing of the maps as well.

Q Anyone else other than your counsel or those that I've mentioned?

A Not that I can recall.

Q When you are drawing at the House level, are you more often looking at the block layer?

A It would depend on which part of the state you were in. In the more rural parts of the state, as you can see on the map, the districts are larger --

Q Sure.

A -- and made up of whole counties. So in those cases, it's probably more county and precinct based in terms of what you use.

Census data until the time when all three of the final maps were published, so the maps that ultimately were passed by Governor Kemp became public. So this is after you --

A Can I ask you to clarify what you mean by a "block equivalency file" to make sure we're on the same page?

Q Yeah. So it's a spreadsheet that request -- that reflects block data.

A Like block with a district assignment?

Q Correct.

A Okay. Just making sure we're talking about the same thing.

So during the process of the draft maps coming out and being made available, yes, I did receive requests for block equivalency files.

Q From whom?

A I know that Shalamar Parham asked for them. And there -- I don't know if there were other people who did, but those -- I know she communicated directly with me. So I don't know if there were others. There may have been, but I know she did.

Q Do you know why?

A Do I know why she wanted them?

Q Yeah.

A I figured she was going to re-create those in her software or their office. She worked for the House Democratic Caucus, so I figured that's what they would be using them for.

Q Did anyone else ask for block equivalency files?

A I don't recollect anyone else, but that could have gone to other staff as well.

Q Other staff you mean in the LCRO?

A Yes.

Q So Mr. Knight?

A It could have -- any requests would come through our office manager, and then she would hand them or give them to staff --

Q Okay.

A -- to handle.

Q So it could have gone to Mr. Knight?

A Could have.

Q Could have gone to Mr. O'Connor?

A Could have. I would think if it was an e-mailed request, it would have been provided already in the documents.

Q What do you mean by that? Sorry.

A The way the -- all the information that was discovery, all those documents, if there was a request

Q And when you answer that, is that just within the redistricting period or is that even after the maps were published?

A Even after. I mean, requests don't come to me and then to them, so they -- like I said, they come through our office manager. If someone asks for some information, it could have been fielded out to anyone in our office to provide the answer to that.

Q You mentioned that Ms. Shalamar?

A Shalamar Parham.

Q Yeah, Ms. Shalamar asked for block equivalency data?

A Yes.

Q Did you give it to her?

A Yes.

Q Did she have any follow-up questions?

A No.

Q Can you recall providing block equivalency data to anyone else?

A She's the only particular individual I recall providing that or asking for that file.

Q So generally, do you recall other people asking for block equivalency data?

A What is the distinction in the question?

Q Because you said particularly, and so I'm

A Well, as I mentioned earlier, the inclusion of an educational video, that was actually my idea. I wanted to provide the people who cared enough to come out to the public hearings the opportunity to learn a little bit about the process, rather than just come up and talk about things without knowing some of the detail or the reasons why we do this. So that video was a new feature to add.

I also -- I don't know if related to the hearings, per se, the Zoom platform is new. We didn't have that before. We have two public hearings on Zoom at this time. That was definitely not something we did ten years before. To allow people to not just watch but also participate from -- from that platform.

I think all of the public hearings were streamed at this time, and I don't know that they were in 2011. They may have been recorded, but I don't know that they were streamed to be able to watch it live as it was taking place. So that was new this time.

And the comment portal we had on the website was also a new feature at this time, to allow people to submit comments, and those comments are actually posted so that they were viewable throughout the whole process. I think the comment portal was left up until through the end of the year, even following the adoption of the maps.

And it actually might still be there now. I'm not even a hundred percent sure if it's still active, but it might be still active now, not to submit, but to at least review comments.

So all of those things were new in 2021 that we did not do or have the ability to do in 2011.

Q Do you recall if the special session timeline was similar in 2011 to 2021, the actual time in special session?

A 2011, the special session was in the summer. It was August, I believe. It was around maybe two, two and a half weeks. It was a relatively short time period. I mean, it was, like I said, in the summer. So 2021, we were in session. Maybe -- I don't know if it was exact. Maybe a little longer than that or around that time period, but it was in November as opposed to August, so much later in the year.

Q Okay. What was generally your role in the redistricting process in 2011?

A Similar to what it was this time. I worked on drawing those maps, worked with the legislators to draw the -- the statewide maps for the Senate and Congressional and a large portion of the House map in 2011.

Q Did you follow a similar process in drawing the

A Traditionally, we renumber the House plan following finalizing a map. And it follows a pattern from the top left, moving towards the bottom right, trying to, number one, if I can maintain the same district numbers that were there previously, that does help with a lot of things in the counties for the elections, and also for the members. But I renumber to try and keep delegations in similar numbering patterns and things like that as it moves through. It's not a perfect science, but that is traditionally what we do in the House.

Q So is it unusual for House District numbers to change for Georgia voters following a Census and a redraw of the maps?

A No, that's not unusual.

Q You talked to Mr. Canter a little bit about the political data that you had available and the process of, I guess, disaggregating or imputing that data to blocks.

Do you recall that?

A Yes.

Q And so is it correct then that if you were looking at Census block data, each Census block has political data in it even though it's an estimate, right?

A Right. As you move blocks, you would see a change in not just demographic data but also in political

data as you move those blocks.

Q And when drawing the maps, you talked about different meetings with groups. Let's start with the -- the Senate groups that you met with. Was the political data for each district an important consideration for the members when they were drawing the maps?

A Yes.

Q And for the House maps, was that also -- was political data also an important consideration?

A Yes.

Q And for the congressional maps in that leadership meeting, was political data an important consideration?

A Yes.

Q Mr. Canter talked with you about the -- the different factors of redistricting that the committee adopted.

Do you recall that?

A Yes.

Q Can you just describe briefly, as a map drawer, how do you go about trying to balance -- because I'm assuming there is a competing interest between a lot of those different factors. How do you go about approaching balancing those different factors?

A It's very difficult, and in certain situations