EXHIBIT N

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

ANNIE LOIS GRANT, ET AL.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, IN HIS OFFICIAL CAPACITY AS THE GEORGIA SECRETARY OF STATE, ET AL.,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

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COAKLEY PENDERGRASS, ET AL.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, ET AL.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

VIDEOTAPED DEPOSITION
of
ERICK ALLEN

February 21, 2023
10:00 a.m.

Taken by Remote Video Conference
Atlanta, Georgia

ANGELA ADAMS, RPR, CCR-B-1404

media to put it out there. So yeah, I don't.

And it is also very few because of the way the maps have been drawn. There are very few competitive districts where that would even matter. So if you look at the makeup of a lot of state House races, a lot of times the candidates are all of one race. So it is very -- I just don't think it is that relevant in state legislative races, one, because you can't get the image out there enough and, two, the races are somewhat monolithic in the appearance of the candidate.

Q. During your time in the state House or after, are you aware of needs that black voters in Georgia have that are different from those of White voters in Georgia?

A. I wouldn't blow it down to the voter. I would say the communities have differences. Some have been more underserved than others. Some have been overresourced. Others have been underresourced. So as far as the voter, I couldn't say that; but I would say that there are minority and majority communities that are or have strong differences.

Q. And so speaking then of the communities specifically, what are some differences that Black communities and White communities have in terms of the

needs of those communities?

A. I would say around healthcare. There is a lot of differences and disparities in the delivery of healthcare services, education.

Minority communities have overwhelmingly been underfunded, and even in recent years where funding is what we would consider balanced in the legislature, you know, you can have School A and School B both getting the same amount of funds but you have got School A making decisions on what kind of band uniforms to buy; whereas, School B is trying to decide if they want to upgrade their science books from the 80s.

So there is a lot of disparities because we have never focused on catching up communities that have been so underfunded for, basically, generations; and so those are real issues in minority underserved communities opposed to those that have traditionally had resources, both public and private.

Q. While you were in the legislature, did you find your Republican colleagues -- or I should say this.

Did you explain those different needs of different communities to Republican colleagues while you were in the legislature?

A. Yes.

Q. And did you find those Republican colleagues to be receptive to what you had to say about the different needs of different communities in Georgia?

A. No.

And that's why being in those communities of interest is so important. They don't have the same issues. You know, a prime example is legislation I tried to get passed for allowing local municipalities and counties to regulate fireworks, and I know this is a weird example; but for those that are in -- you know, I will use what we have been talking about.

If you are in Bartow County and you are setting off M16 cherry bombs, whatever those big fireworks are, on a 5-acre, 12-acre farm, that is completely different than doing it in an apartment complex in Smyrna where you have got soldiers with PTSD, you have got animals that are jumping fences and running away, you have got kids who are scared, you have got people calling the police thinking they hear gunshots and burdening resources in the county.

So you can explain certain things to those legislators, but because of environmental and lived experience differences, it just doesn't resonate.

MR. TYSON: Mr. Videographer, if