EXHIBIT K

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

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,

vs.

BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia,

Defendant.

CIVIL ACTION FILE
NO. 1:21-CV-05337-SCJ

30(b)(6) DEPOSITION OF
SIXTH DISTRICT OF THE AFRICAN METHODIST
EPISCOPAL CHURCH GIVEN BY

REGINALD JACKSON

January 9, 2023

9:03 a.m.

1 Atlanta, how are you going to get to either Macon or
2 Atlanta, say, if you are in the middle somewhere,
3 say, Stockbridge or whatever? So that became a
4 concern.
5 Hospitals closing down became a concern
6 because you have a lot of people, particularly in the
7 black community, their only access to health care is
8 the emergency room at the hospital. And with Grady
9 being the only hospital in Atlanta with acute care, a
10 lot of people ended up not having -- hospitals ended
11 up not having beds in the emergency area. Some of
12 them were placed on gurneys in the hall. And so we
13 just thought that's an issue that blacks ought to
14 be -- because that's important to them.
15 Q. And when you say you wanted voters to vote
16 in their best interests, was that for a particular
17 party, or was it on issues?
18 A. No. They -- based on their, voter
19 education, if it was affected, they would determine
20 what was best for them, you know, and which people
21 are discovering more and more, blacks are not all
22 single-minded.
23 You know, as a matter of fact, my wife
24 still looks at me strange because even in New Jersey,
25 she said, Reggie, you are just an oddball. I have

A. Again, I don't think you can separate them. For example, again, and I use the Augusta area as a major example. There was a senator in that Augusta -- and I forget what district it was -- but he was very much in opposition to almost everything the citizens in that district wanted. And, I mean, not citizens, but the citizens in his own district. But with the redistricting, they actually took part of another district, which was predominantly African-American where a number of our churches were, and put them in his district. So now we're shackled by a heavy burden.

Q. And the heavy burden that you're shackled to there is a legislator --

A. He's now their senator.

Q. -- who doesn't represent the interest of the black voters?

A. Yes.

Q. Okay.

MR. GARABADU: Since we've been going for an hour, would this be a good time to take a break?

THE VIDEOGRAPHER: Off the video record at 11:11 a.m.

(A recess was taken from 11:11 a.m. to 11:21 a.m.)

Q. Do you have any volunteers who are solely devoted to redistricting advocacy?
A. No.
Q. Have you had a situation in the Sixth District where the Sixth District wasn't able to complete a project it wanted to do because of its work around redistricting?
A. No.
Q. Earlier when we were talking about the Georgia General Assembly, you mentioned a state senator from the Augusta area who didn't represent black interests. Do you recall that?
A. Yes, I do.
Q. And was that Senator Max Burns?
A. I believe so.
Q. And are the interests that you referenced that were unrepresented the same ones you discussed earlier about health care and those topics, or were they unique situations for Senator Burns?
A. They were unique situations for Senator Burns and -- because I got this from folk in that district, but there were also instances where he was outspoken on some issues that were disturbing.
Q. And do you recall what the disturbing issues were?