EXHIBIT H

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

Q. And outside of the hearing, did you meet with anyone one on one?

A. Oh, no, I -- no, I did not do that. There was...

Q. Did any constituents discuss racial demographics with you in connection with the redistricting?

A. I don't recall that.

Q. Any other legislators?

A. I don't recall that, no.

Q. Did any of the discussions with constituents or advocate groups affect your views about the Congressional maps?

A. No.

Q. What about the House maps?

A. No.

Q. Did you think that their comments just didn't generally have merit?

A. I felt like they were partisan.

Q. Did you look at the materials that they provided to you?

A. I did.

Q. And you didn't find them persuasive?

A. I did not. I did go so far as to even look up some of the people who presented them, and I

1 looked at their social media and they were very
2 liberal. They were very partisan.
3 Q. Did you ever review public comments that
4 were submitted through the redistricting committee's
5 public portal about that Congressional map?
6 A. Yes, I did.
7 Q. Regularly?
8 A. Somewhat regularly. I would do it in big
9 chunks, and then toward the end it was more regular.
10 Q. Did you incorporate input from any of
11 those comments into your views on the maps?
12 A. We did. The one that I remember, and it
13 really came up in the -- in the town hall meetings,
14 was about a municipality where we tried -- that was
15 something we talked about was something that we
16 could try to -- to do. And Gina did that for us,
17 Gina Wright.
18 Q. Do you know if there was the capability to
19 attach documents into the public portal, like
20 alternative maps?
21 A. I -- I don't recall. But I do think that
22 there were -- some of those paid lobbyists for the
23 nonprofits mailed them to me and came to my office
24 and dropped them off.
25 Q. Did you ever communicate with any other

I have babies.

BY MR. MELLMAN:

Q. And do you recognize this document?

A. Yes. It appears to be a press release.

Q. And what is it -- what is it discussing?

A. The town hall meeting.

Q. Okay. And do you see a date on there?

A. I see the date it was printed. Oh, June 16, 2021.

Q. Okay. And so do you agree that this document shows that from June 28 through August 11 the House and Senate committees held town halls in Georgia about the redistricting process?

A. Yes.

Q. And you recall that happening?

A. Yes.

Q. You recall the town halls taking place?

A. Yes, yes.

Q. And as we discussed before, the full census wasn't released until September.

So these town hall meetings took place before the census data was fully released?

A. Yes.

Q. Why was that?

A. In order to visit as many places in the

outlined in the email.

Q. Okay. And so at the town halls did you or other legislators answer questions from Georgia residents?

A. No.

Q. Were any requests made to you that information about the redistricting process be provided in languages other than English?

A. Yes.

Q. What happened as a result of those requests?

A. That's something we talked about and, ultimately, that's just not the way our committees work here in the State House and the State Senate. We don't translate and we didn't have the resources to do that, and there was just no practical way to -- to accomplish that goal.

Q. Did you look into doing that?

A. No, we -- we didn't. We -- we -- we all discussed it and ultimately decided that it was not a reasonable request.

Q. "We all" meaning the members of the committee?

A. Yes.

Q. Just the House Committee or the Senate

committee as well?

A. Oh, I don't know what the Senate committee did. The House.

Q. Do you know if any of the town hall locations were inaccessible to people with disabilities?

A. It's my understanding that none of them were. I did receive an email from someone claiming that the Augusta location was not accessible. But I brought that up to the legislator who arranged this, and he went to the venue and, ultimately, that was a false claim, is what was reported to me.

Q. Were there any other redistricting town halls held after the release of the census data?

A. I do not recall.

Q. To your knowledge, was the August 11, 2021, town hall the last one?

A. If that's what our records show on the Redistricting Committee website. I -- I don't have independent recollection.

Q. Did you publish any redistricting information in languages other than English?

A. No.

Q. Do you recall the date that the census released the results of the 2020 census?

A. I recall the Reapportionment Office talking to us about that. I think that might be that legacy data that I referenced earlier.

Q. And looking at the -- the next bullet there it appears that the final redistricting data was released September 16?

COURT REPORTER: Excuse me, Mr. Mellman. You have to get closer to the microphone.

BY MR. MELLMAN:

Q. It appears the final redistricting data was released September 16?

A. Yes.

Q. Why is the census data important in drawing districts, to your knowledge?

A. Well, to my knowledge, that's -- that's what's used to determine where the growth and population retraction are. So that guides how you draw the maps.

Q. And so you agree that before seeing the census data, the public wouldn't be able to know which areas of the state had grown and which had shrunk?

A. No, I don't agree with that. Informed people already knew that generally there was a lot of growth in the metro Atlanta area and that there