EXHIBIT D

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

ALPHI 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. CASE NO. 1:21-CV-05337-SCJ

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

Defendant.

DEPOSITION of JASON M. WARD, Ph.D.

February 8, 2023

9:00 a.m.

Tayor English Duma, LLP

1600 Parkwood Circle, Suite 200

Atlanta, GA 30339

Lucy C. Rateau, CCR, RPR

research into civil and voting rights in Mississippi. They have an extensive archive.

Q. That raises a question. Your CV, Exhibit 3, at the very end, the last page which is numbered page 35, has your professional memberships. And you've got three listed there. I don't think you've got any other sorts of organizational memberships listed in your CV. Am I right about that?

A. I don't. Those would be professional memberships. In my capacity as a historian, those are the memberships I keep current.

Q. Are there any other organizations to which you belong?

A. Certainly none of a professional context. None come to mind that would be relevant to the content of this work or report.

Q. Are you a member of any advocacy organizations?

A. No.

Q. At the end of the second paragraph on page 22, the fourth line up, "Race has been the most consistent predictor of partisan preference in Georgia." Do you agree with that?

A. I do.

Q. Have you looked at other factors that would

influence partisan preference in Georgia besides race?

A. I acknowledge that there are others. I would stand by the claim that race is a more consistent predictor, indicator than socioeconomic status or educational level.

Q. Do you actually mention those in the report?

A. I do not.

Q. But you're telling me now you think socioeconomic level has something to do with partisan preference?

A. I was simply giving examples of other factors that one might point to or discuss in relation to why people vote for one party or the other. I'm not offering a professional opinion about the degree to which those factors correlate.

Q. But since you are saying in your report that race is the most consistent factor affecting partisan preference, can you tell me as you sit here today what you believe the other factors are?

A. I believe there are other factors. I believe that you can document cases where one's class status, socioeconomic status, educational level, those have been studied, those have been