

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

Page 1

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

ANNIE LOIS GRANT, et al.,

Plaintiffs,

vs.

CIVIL ACTION FILE

NO. 1:22-CV-00122-SCJ

BRAD RAFFENSPERGER, in
his official capacity as
the Georgia Secretary of
State, et al.,

Defendants.

DEPOSITION OF MARY NELL CONNER

Taken by Remote Conference

February 9, 2023

2:57 p.m.

Valerie N. Almand, RPR, CRR, CRC

Page 2

INDEX OF EXHIBITS

(None marked)

INDEX OF EXAMINATION

By Ms. Clapp

Page 4

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1 MS. CLAPP: Good afternoon. This will be
2 the deposition of Ms. Mary Nell Conner, taken by
3 defendant and Secretary of State Brad
4 Raffensperger and members of the state election
5 board, for the purpose of discovery and all
6 purposes allowed under the Federal Rules of Civil
7 Procedure.

8 All objections except those going to the
9 form of the question and the responsiveness of the
10 answer are reserved until trial or the first use
11 of the deposition.

12 Are those stipulations agreeable to you,
13 counselor?

14 MS. RUTAHINDURWA: Agreed.

15 MS. CLAPP: Thank you. And how do you
16 wish to handle signature?

17 MS. RUTAHINDURWA: Reserve signature.

18 MS. CLAPP: Great.

19 MARY NELL CONNER,
20 being duly sworn, was examined and testified as
21 follows:

22 EXAMINATION

23 BY MS. CLAPP:

24 Q. Ms. Conner, my name is Hannah Clapp. I'm
25 an attorney with Taylor English Duma. I represent

1 the defendants in this action.

2 The purpose of this deposition is not to
3 confuse you, so if I ask you a question that you
4 don't fully understand, can we agree that you will
5 let me know?

6 A. Yes.

7 Q. Perfect. For the court reporter, please
8 speak clearly and loud enough so that she can hear
9 you and be sure to say yes and no as opposed to
10 uh-huh, and try to give audible answers as opposed
11 to nodding your head up and down. Is this
12 agreeable to you?

13 A. Yes.

14 Q. And especially over Zoom, it's important
15 that we not speak at the same time. So please
16 wait until I complete my question before you
17 answer. If you need a break at any time, meet let
18 me know. You can wave your hand, you can say,
19 Hannah, I need to step away for a second, but I'll
20 ask you to answer the last question before we take
21 a break.

22 And, lastly, we ask that you not have any
23 electronic devices available during your
24 deposition, including your cell phone, your email,
25 Facebook, you know, television on in the

1 background. Certainly you'll need to keep your
2 Zoom open on your computer or your phone, but do
3 you agree to not have your cell phone on or email,
4 text messaging or any social media open during
5 your deposition?

6 A. I do.

7 Q. Great, thank you. And I will go ahead
8 and share my screen for a moment. Make sure I'm
9 selecting the right screen. Okay, do you see my
10 screen right now, Ms. Conner?

11 A. I do. I do.

12 Q. Okay. Are you familiar with this notice
13 to take your deposition?

14 A. Yes, yes.

15 Q. Okay. And have you read it in its
16 entirety?

17 A. Yes, I have. I have.

18 Q. Okay.

19 (Off-the-record discussion)

20 BY MS. CLAPP:

21 Q. Okay, Ms. Conner, have you ever given any
22 prior testimony, whether that be in a deposition
23 or trial?

24 A. No.

25 Q. All right. And have you taken any

1 medications today that would keep you from fully
2 and truthfully participating in today's
3 deposition?

4 A. No.

5 Q. And do you have any medical conditions
6 that would keep you from fully and truthfully
7 participating in today's deposition?

8 A. No.

9 Q. And have you ever been involved with any
10 prior lawsuits, whether that's yourself or a
11 family member, in any election-related cases?

12 A. No.

13 Q. Have you made any prior claims in any
14 election-related -- or any election-related
15 claims?

16 A. No.

17 Q. Have you ever been charged with a crime?

18 A. No.

19 Q. Have you ever been arrested?

20 A. No.

21 Q. Have you ever been convicted of a crime?

22 A. No.

23 Q. Have you discussed this case with anyone
24 other than your attorney?

25 A. No.

1 Q. And have you discussed this deposition
2 with anyone other than your attorney?

3 A. No.

4 Q. Did you review anything today to prepare
5 for your deposition?

6 A. No.

7 Q. Okay. Do you have any notes or memos or
8 other documents that relate in any way to this
9 case?

10 A. No.

11 Q. Okay. And will you please state your
12 full name and your current address for the record.

13 A. Mary Nell Conner. My address, [REDACTED],
[REDACTED],
15 Locust Grove, Georgia, ZIP Code [REDACTED]

16 Q. Okay. And how long have you lived at
17 that address?

18 A. Four years.

19 Q. In what year and month did you move to
20 that address?

21 A. August 31st of 2018.

22 Q. Do you know what county that's in?

23 A. Henry.

24 Q. And where did you live before [REDACTED]
[REDACTED]?

1 A. [REDACTED] [REDACTED] [REDACTED] in Stockbridge.

2 Q. Do you know why you moved?

3 A. I purchased a home.

4 Q. Okay. And what county was that [REDACTED]

5 [REDACTED] address in?

6 A. That was in Henry County as well.

7 Q. Okay. How long were you at the [REDACTED]

8 [REDACTED] address?

9 A. Five years.

10 Q. Okay. And how long have you lived in
11 Henry County overall?

12 A. Ten years.

13 Q. And where did you live before Henry
14 County?

15 A. Clayton County, Georgia.

16 Q. Did you ever reside in any other state?

17 A. Prior to Georgia, yes.

18 Q. And what states was that?

19 A. Michigan, Farmington Hills, Michigan.

20 Q. Anywhere else?

21 A. Kansas City, Missouri.

22 Q. Was there anywhere else?

23 A. Chicago, Illinois.

24 Q. And what time period did you live in
25 Farmington, Michigan?

1 A. The timeframe was -- just give me a
2 minute, I'm thinking back.

3 Q. Oh, that's okay.

4 A. I think the time period was, I can safely
5 say -- hmm, bear with me.

6 Q. That's okay, take your time.

7 A. That was from 2000 till -- until 2005.

8 Q. And when did you live in Kansas City,
9 Missouri?

10 A. 1998 until 2005.

11 Q. And what about Chicago?

12 A. Chicago was 1995 to 2000.

13 Q. Okay. Where did you live before Chicago?

14 A. Memphis, Tennessee.

15 Q. What years were you in Memphis?

16 A. 1956 until 19 -- until 1992.

17 Q. Were you born in Memphis?

18 A. Yes.

19 Q. Okay. And where are you testifying from
20 today?

21 A. Locust Grove, Georgia, at my address.

22 Q. The [REDACTED] address?

23 A. Yes.

24 Q. Okay. Is there anyone else there with
25 you today?

1 A. I live with my daughter, but she's not in
2 the room.

3 Q. Okay, thank you. All right. And where
4 did you go to high school?

5 A. Millington Central High School in
6 Millington, Tennessee.

7 Q. In what year did you graduate?

8 A. 1974.

9 Q. Did you go to college after that?

10 A. I eventually went. Not right out of high
11 school.

12 Q. What did you do right after high school?

13 A. I started working.

14 Q. And what did you do for work?

15 A. I worked with South Central Bell, the
16 telephone company.

17 Q. And how long were you with them?

18 A. Three years.

19 Q. Do you remember why you left?

20 A. They moved to Brentwood, Tennessee, and
21 at that time I was not able to relocate with them,
22 so I resigned.

23 Q. What did you do once you resigned?

24 A. Once I resigned I went to work for --
25 there were several jobs I had. Cleo Wrap, the

1 wrapping paper company. And I worked as a
2 security guard for about six months. And I worked
3 at Levi Strauss & Co. in Memphis. And then I
4 moved -- I started working for -- I moved to
5 Chicago and started working at FedEx.

6 Q. And what did you do for FedEx?

7 A. I started off as a customer service rep
8 in a station, and then I was promoted to call
9 center manager, and then I was promoted to an
10 administrative manager at a station in Michigan,
11 South field, Michigan.

12 Q. Is that why you moved around, you
13 followed your job?

14 A. Yes.

15 Q. Okay. So how long were you with FedEx?

16 A. Almost 12 years.

17 Q. And why did you leave FedEx?

18 A. I went to work for -- I'm trying to think
19 of the name of the company -- in Troy, Michigan.
20 I worked at that -- let's see, I'm trying to think
21 of the name. They were a contractor for OnStar,
22 so I worked for OnStar there for three years, then
23 relocated to Georgia here to be with my daughter
24 and granddaughter.

25 Q. What was your daughter doing in Georgia?

1 A. My daughter was working for a trucking
2 company, Swift Transportation.

3 Q. And when did you decide to go to college?

4 A. Well, I went to DeVry and I graduated in
5 2015. There was a three-year program with DeVry
6 University.

7 Q. That's amazing. What kind of program was
8 it?

9 A. Health information technology.

10 Q. What do you do with health information
11 technology?

12 A. Well, I learned to code medical
13 procedures and to be able to read a lot of the
14 medical terminology. For example, if a person was
15 admitted to the emergency room, I was able to read
16 the codes that they were admitted in -- that they
17 were admitted for.

18 Q. That's pretty complicated stuff. You're
19 doing like the CPT codes or the diagnosis codes?

20 A. The diagnosis codes.

21 Q. Okay. And are you still working in that
22 field now?

23 A. No.

24 Q. Are you retired?

25 A. Yes.

1 Q. What year did you retire?

2 A. I retired in 2018.

3 Q. Where were you working before you
4 retired?

5 A. For the State of Georgia in the
6 department of revenue.

7 Q. What were you doing for them?

8 A. Reviewing income tax returns.

9 Q. What kind of training do you need to do
10 that?

11 A. They train you on the job.

12 Q. And when did you start there?

13 A. It was February of -- I'm trying to
14 think -- February of 2015.

15 Q. So February of 2015 to 2018 you were
16 working for the Georgia Department of Revenue?

17 A. Yes.

18 Q. Okay. And why did you leave that job?

19 A. I retired.

20 Q. Just time to be done?

21 A. Yes.

22 Q. All right. We'll move onto your voter
23 registration history. Are you registered to vote
24 in Georgia?

25 A. Yes.

1 Q. Do you remember where you registered to
2 vote?

3 A. I registered when I changed my license in
4 Clayton County, Georgia.

5 Q. Do you remember what year that was?

6 A. 2005.

7 Q. And have you ever registered anywhere
8 else to vote?

9 A. In Henry County.

10 Q. Have you registered in any other states?

11 A. No.

12 Q. And are you registered to vote at your
13 current address?

14 A. Yes.

15 Q. Do you know what district you resided in
16 before the recent redistricting took effect?

17 A. No, I do not.

18 Q. And have you voted in each election since
19 you've been registered to vote in Georgia?

20 A. Yes.

21 Q. Does that include special elections?

22 A. Yes. Any election that I can vote in, I
23 vote in it, in that election.

24 Q. Okay. Great. Do you know what precinct
25 you voted in for the November 2022 election?

1 A. No, I do not.

2 Q. Do you know the general location?

3 A. No. I go to my polling place, which is a
4 library. That's where I vote every time.

5 Q. Okay. What's the name of the library?

6 A. Locust Grove Library.

7 Q. Did you vote in that same location for
8 the runoff?

9 A. Yes.

10 Q. And do you consider yourself to be a
11 member of the Democratic party?

12 A. Yes.

13 Q. Since when?

14 A. Since 2005.

15 Q. And have you ever held a leadership
16 position in that party?

17 A. No.

18 Q. Have you ever held any position or served
19 on any committee of the Democratic party?

20 A. No.

21 Q. Have you participated in any activities
22 of the Democratic party?

23 A. No.

24 Q. Have you ever considered yourself to be a
25 member of the Republican party?

1 A. No.

2 Q. Is it fair to say you generally support
3 Democratic candidates for election in Georgia?

4 A. Yes.

5 Q. And have you ever voted for a Republican
6 candidate?

7 A. Yes.

8 Q. Do you remember who and when that would
9 have been?

10 A. No, I do not.

11 Q. Okay. Have you ever been a member or
12 held a position in any other political party?

13 A. No.

14 Q. Have you ever worked on a political
15 campaign?

16 A. No.

17 Q. Have you ever participated in any kind of
18 voter advocacy group?

19 A. No.

20 Q. Okay. When did you first learn about
21 this lawsuit?

22 A. It was late last -- late last year, late
23 of 2022. Maybe October, November.

24 Q. How'd you learn about it?

25 A. Reading the newspaper.

1 Q. How did you join the lawsuit if you read
2 about it in the newspaper?

3 A. I went to the website listed in the
4 newspaper and placed my name there.

5 Q. Okay. And when did you first talk to a
6 lawyer about the case?

7 A. About three weeks ago.

8 Q. Did you attend any kind of meeting to
9 discuss the case before you hired an attorney?

10 A. No, I did not.

11 Q. And what research did you do concerning
12 the issues in this case?

13 A. None.

14 Q. What research did you do concerning your
15 attorneys in this case?

16 A. None.

17 Q. Is there any kind of fee contract --
18 sorry, go ahead.

19 A. I said I was contacted by an attorney,
20 and that's the person I spoke with.

21 Q. Do you remember who you talked to?

22 A. My attorney was named Makeba, her first
23 name.

24 Q. Okay. And do you have any kind of fee
25 contract with your attorneys?

1 A. No.

2 Q. And have you been paid or have you
3 received anything of value in exchange for your
4 participation in this litigation?

5 A. No.

6 Q. If you'll give me just one moment. Have
7 you seen the complaint in this litigation?

8 A. Yes.

9 Q. When was the first time you saw the
10 complaint?

11 A. In reading of it, about two weeks ago.

12 Q. And do you know about the specific
13 allegations in the complaint?

14 A. I do.

15 Q. Okay. Did you reach out to any
16 legislator during the 2021 special session?

17 A. No, I did not.

18 Q. Did you testify in the Georgia assembly
19 on any of those issues or any issues pertaining to
20 redistricting in 2021?

21 A. No.

22 Q. Did you attend any hearings in the
23 Georgia legislature pertaining to redistricting?

24 A. No.

25 Q. Did you attend any other meetings

1 concerning redistricting in 2021?

2 A. No.

3 Q. Okay. Do you know what the term
4 "community of interest" means?

5 A. Yes.

6 Q. Okay. How would you -- or what do you
7 consider your community of interest?

8 A. The redistricting, the redistricting of
9 our -- of our -- where we vote. The redistricting
10 of our districts. Which would mean that where I
11 live, my district could be changed to where it
12 would either eliminate me or it would include me
13 more.

14 Q. Okay. Can you describe your community.

15 A. My community is in between the north,
16 foremost north and southern part of Henry County.
17 We do have schools in our district. And we have
18 several subdivisions in our district. So we have
19 a good mixture of ethnicity, which means that
20 would be Democrats and Republicans.

21 Q. And what is that opinion based on?

22 A. The opinion is based on the children at
23 the elementary school, and just basically looking
24 around my neighborhood.

25 Q. Okay. Speaking of your neighborhood,

1 have you or do you participate in any neighborhood
2 or community associations?

3 A. No, no, we had --

4 Q. Are you a member of any -- go ahead.

5 A. We have -- I don't think you're referring
6 to an association, homeowners association, because
7 we do not meet. Our headquarters is somewhere
8 else.

9 Q. Your headquarters for what?

10 A. The homeowners association.

11 Q. Okay. Do you have a -- just like a -- it
12 doesn't have to be a formal association. Do you
13 have an informal neighborhood group or homeowners
14 group?

15 A. We have an informal neighborhood group
16 that we have a blog, and we talk on the blog.

17 Q. Okay.

18 A. But we do not meet in person.

19 Q. Who participates in this blog?

20 A. There's about 10 neighborhoods
21 surrounding our neighborhood, which includes
22 several subdivisions.

23 Q. Is this something like Nextdoor or
24 Facebook?

25 A. It's like Nextdoor, yes.

1 Q. Those are usually very helpful. They
2 keep you in the loop on what's going on. And are
3 you a member of any faith-based group or
4 organization?

5 A. No.

6 Q. And are you involved in any school
7 associations or activities?

8 A. No.

9 Q. Are you in any kind of fraternity or
10 sorority?

11 A. No.

12 Q. And are you involved in any civic
13 organization?

14 A. No.

15 Q. All right. And outside of, I guess
16 outside of your neighborhood associations, where
17 do you spend most of your time?

18 A. At the senior citizens center, and I --
19 I'm teaching my daughter how to sew. So that's
20 where I spent my time.

21 Q. It takes kind of a long time to learn how
22 to sew, doesn't it?

23 A. Yes, it does.

24 Q. Especially if you want to be any good at
25 it.

1 A. Well, if you're teaching someone, it's
2 even longer.

3 Q. Yeah, I bet. And what kinds of
4 activities do you do at the senior citizens
5 center?

6 A. I eat breakfast, lunch, and when they
7 have programs like for veterans, every week some
8 school comes in and a choir would come in and
9 sing, we play games, and we do arts and crafts.

10 Q. That sounds fun. Can I join? How far is
11 the senior citizens center from your house?

12 A. One and a half miles.

13 Q. Does it have a name?

14 A. It's the Locust Grove Senior Center.

15 Q. How long have you been going there?

16 A. For the last two years.

17 Q. All right. So going back to voting, have
18 you ever been prohibited from registering to vote
19 based on your race?

20 A. No, I have not.

21 Q. Have you ever been prohibited from
22 participating in the political process based on
23 your race?

24 A. No.

25 Q. And do you have any personal knowledge of

1 discrimination by the government of Georgia
2 against members of a minority group related to
3 participation in the Democratic process?

4 A. No.

5 Q. In your opinion do black voters in
6 Georgia generally vote for Democratic candidates?

7 A. Yes.

8 Q. Do you know if Georgia uses a majority
9 vote requirement in its elections?

10 A. Yes.

11 Q. Okay. You'd agree that the majority vote
12 requirement led to the runoff in 2021, correct?

13 A. Yes.

14 Q. And that resulted in the election between
15 Senator Warnoff and Senator Ossoff, correct?

16 A. Yes.

17 Q. And those were candidates you supported,
18 correct?

19 A. Yes.

20 Q. Okay. Are you familiar with the term
21 "candidate slating process" as it's used in
22 elections?

23 A. Repeat that, please.

24 Q. Yes, ma'am. Are you familiar with the
25 term "candidate slating process" as it's used in

1 elections?

2 A. No.

3 Q. In your opinion does a lack of education
4 keep people of color from participating in Georgia
5 politics?

6 A. Yes.

7 Q. Okay. Can you explain how.

8 A. On election day if the voter is unable to
9 read the name of the individuals that are on the
10 ballots, if they are unsure of what an incumbent
11 is as well as the other person, most of them, a
12 lot of them, does not participate in the early
13 voting because they're not encouraged to
14 participate in early voting.

15 If you do not know where your polling
16 place is and you go on line to check to see, there
17 have been occasions where if you did not keep your
18 voters registration up to date, you would go to
19 that polling place where you had been going only
20 to find out you needed to go somewhere else
21 because the district had changed.

22 Q. Okay. Do you have any personal
23 experience of any of this?

24 A. Yes. There have been friends since I've
25 been here -- well, I always keep up with mine so I

1 know where I need to go. But there have been
2 people that moved and they said, I went to where I
3 voted before and they told me I needed to go
4 somewhere else.

5 Q. Okay. Thank you for that answer. Do you
6 believe a lack of employment opportunities keep
7 people of color from participating in Georgia
8 politics?

9 A. Yes.

10 Q. How so?

11 A. Usually if you're unemployed you do not
12 have the resources to get out and do a lot of
13 things. So therefor when it comes to voting, you
14 may have just started a new job and you don't want
15 to take off to go vote. If the polls are not open
16 on Saturday then if you work Monday through Friday
17 you're reluctant to take off either Monday through
18 Friday to go vote, so you're left on having to
19 vote on Saturday. Saturday voting sometimes is
20 limited to very few places in Georgia.

21 Q. Okay. Do you have any personal
22 experience of, you know, employment opportunities
23 affecting voter participation in minority groups?

24 A. No.

25 Q. Okay. And does a lack of access to

1 health services in your opinion keep people of
2 color from participating in Georgia politics?

3 A. Yes, it does. The lack of healthcare
4 prohibits people of color and everybody from being
5 at their best. If on election day you have a
6 doctor's appointment, you go to that doctor's
7 appointment. And you can't really judge how long
8 it's going to take.

9 If your health is not good, say, for
10 instance, if you're on dialysis and you do
11 dialysis Tuesday, Thursday, Saturday, if you do
12 not early vote and you have to go on dialysis the
13 Tuesday that you're scheduled to vote, it's quite
14 possible you will not make it to vote because you
15 do not know how you're going to feel when you get
16 out of dialysis. It might be a case where you
17 need to come home and rest, so therefor you will
18 not make to the polling place.

19 There is also transportation. If you do
20 not drive, you're dependent on getting a ride,
21 usually there's a transit bus in every county.
22 Some counties, there is not. But you would want
23 to schedule a ride to the polling place and a ride
24 back home.

25 So yes, your health has a lot to do with

1 it, because unless you're able to drive yourself,
2 healthy enough to drive yourself to the polls and
3 vote, then that causes a problem.

4 Q. Okay. Do you feel that that affects
5 minority groups more so than the white residents
6 of Georgia?

7 A. Yes, it does, because the minority ones
8 are the ones who really suffer with more health
9 problems than any other group. Doesn't have to
10 necessarily be a Caucasian, but the minority, the
11 people of color, we have a lot of ailments going
12 on. So I think we go to the doctor a little bit
13 more than others due to diabetes, kidney problems,
14 heart problems, and that's because we've not had
15 the opportunity to take care of our health like we
16 should.

17 Q. That's a very thorough answer and I
18 appreciate your passion too, so thank you.

19 Are you familiar with the term "racial
20 appeals" when used in the context of elections?

21 A. Yes.

22 Q. Can you explain your understanding of
23 racial appeals and how you've seen them in
24 Georgia.

25 A. Okay. To me racial appeals are what can

1 we do to appeal to this certain group. If we are
2 trying to get the Hispanic vote then we would have
3 people in the commercials, Hispanics. If we are
4 trying to get to the black vote, then we will have
5 successful black people behind that candidate or
6 telling you, This is a good candidate.

7 And as well as -- I'm not limiting
8 poverty to black people or Hispanics, but every
9 group of people, Caucasians, blacks and
10 Hispanics -- if you want to appeal to that racial
11 aspect or that race of people, then you would
12 include people of that color and that race in your
13 campaign.

14 Q. And have you seen campaigns like this in
15 Georgia?

16 A. Yes.

17 Q. Can you describe some of those racial
18 appeals that you saw.

19 A. Yes. With -- with Senator Warnock, he
20 had quite a few African-Americans who say, This is
21 a good person, we need to vote for him. He also
22 had a lot of Caucasians that said his opponent was
23 not the person you need for the job. And one of
24 the other things, Senator Warnock has been in
25 Washington and his opponent had not.

1 Then you have ethnic areas like, say, if
2 someone in Buckhead said that Jon Ossoff was a
3 good candidate, that would probably carry more
4 weight than someone in a lower economic
5 neighborhood in Georgia. And many times they just
6 skip over those neighborhoods that are lower
7 income group in those neighborhoods.

8 Q. Okay. And have you seen a similar
9 treatment of Republican white and black
10 candidates?

11 A. Yes. The Republicans have a tendency to
12 show faces of very successful people or -- or an
13 African-American person that they really helped to
14 get on their feet, and then they would have that
15 African-American say, This is a good person, we
16 need to vote for him, he helped me.

17 I remember one was -- one lady, her
18 father was in the military, he passed, and he was
19 buried in Arling -- in the cemetery for veterans.
20 Her mother died and she wanted to have her
21 father's body buried beside her mom's. So she
22 knew that her mother could not be buried in the
23 cemetery -- in the military cemetery, so she was
24 having a problem getting her father's body buried
25 in a regular cemetery with her mom. And this

1 particular candidate helped her to get that done.
2 So, of course, you have her saying, I don't know
3 what I could have done if this candidate had not
4 helped me get my father and mother buried in the
5 same cemetery.

6 Now, I think that's something that any
7 candidate or anyone in position would have helped
8 with. But since that was an election year, now
9 it's a very big deal.

10 Q. Do you know how many black people have
11 run for office in Georgia?

12 A. I've not kept count, but I can imagine
13 that in every election there's been a black person
14 running.

15 Q. Okay. Do you know how many black people
16 have been elected to public office in Georgia?

17 A. Not to the Georgia house, but two for the
18 federal in the Senate.

19 Q. Okay. Yeah, that was going to be my
20 followup, about Senator Warnock and Herschel
21 Walker having run too. So, just for the record,
22 are you aware that the United States Senate is a
23 state-wide office and that both major political
24 parties were represented by people who are black
25 in the last election?

1 A. Yes, I am aware.

2 Q. And I think you've touched on this a
3 little bit, but I'd love to hear more from you.
4 Are there any needs of the minority community in
5 Georgia that in your opinion differ from those of
6 white residents?

7 A. Yes, it is.

8 Q. Sure. Can you elaborate some more.

9 A. Some of the needs in the black
10 neighborhoods is they need -- the neighborhoods
11 need to be safer, they need to attempt the
12 employment of that neighborhood. The housing in
13 usually in a black neighborhood are dilapidated,
14 they're not up to code. The streets are not paved
15 and they do not have sidewalks. And usually
16 there's a lot of crime.

17 Q. Okay. I'm not agreeing or disagreeing, I
18 just kind of want some more information. But why
19 do you feel like that affects minority communities
20 more so than white communities?

21 A. Because in most minority communities, in
22 my opinion, there are so many people that are
23 unemployed, which brings about a lot of crime.
24 Whereas white neighborhoods, I think most of those
25 people are employed, and they just don't have the

1 amount of crime that black neighborhoods have.

2 Q. What are the particular needs of the
3 minority community in Georgia, in your opinion?

4 A. The need is fair housing, they need more
5 resources for their community, and they need
6 better upkeep of their streets and sidewalks.

7 Q. And what is that based on?

8 A. That is based on there are certain
9 neighborhoods, if I drive through that
10 neighborhood I don't feel safe if there are not
11 sidewalks. I look at the housing, where the
12 housing is not up to par, they're dilapidated.
13 Every other house may be boarded up where nobody's
14 living there. So that's an opportunity for crime
15 or for people to go in those places, let's just
16 say homeless people go in there to live or a
17 squatter, because there's no one taking care of
18 that property.

19 Say, for instance, if I had a house and
20 the house next to me was abandoned and was
21 dilapidated, no, I would not feel safe living
22 there.

23 MS. CLAPP: All right, Ms. Conner, I
24 think I covered everything I needed to today,
25 unless your attorney, Makeba, has anything for

1 you.

2 MS. RUTAHINDURWA: I have no questions,
3 thank you.

4 MS. CLAPP: Ms. Conner, thank you so much
5 for your time today. I appreciate your thoughtful
6 answers, and it's very helpful to us, and I'm sure
7 your team appreciates it as well.

8 Valerie, I think we're ready to wrap up
9 if you are.

10 (Deposition concluded at 3:46 p.m.)

11 (Signature reserved)

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1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the caption,
6 and the colloquies, questions and answers were
7 reduced to typewriting under my direction; that the
8 transcript is a true and correct record of the
9 evidence given upon said proceeding.

10 I further certify that I am not a relative
11 or employee or attorney of any party, nor am I
12 financially interested in the outcome of this
13 action.

14 I have no relationship of interest in this
15 matter which would disqualify me from maintaining my
16 obligation of impartiality in compliance with the
17 Code of Professional Ethics.

18 I have no direct contract with any party
19 in this action and my compensation is based solely
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this
22 proceeding impacts my absolute commitment to serve
23 all parties as an impartial officer of the court.

24 ary 2023.

25 

Valerie Almand, CRR, RPR, CRC, B-531

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Veritext represents that the foregoing transcript as produced by our Production Coordinators, Georgia Certified Notaries, is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the certified court reporter in this case. Veritext further represents that the attached exhibits, if any, are a true, correct and complete copy as submitted by the certified reporter, attorneys or witness in this case, and that the exhibits were handled and produced exclusively through our Production Coordinators, Georgia Certified Notaries. Copies of notarized production certificates related to this proceeding are available upon request to litsup-ga@veritext.com.

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1 TO: Makeba Rutahindurwa, Esquire
2 Re: Signature of Deponent Mary Nell Conner
3 Date Errata due back at our offices: 30 days
4

5 Greetings: The deponent has reserved the right to
6 read and sign. Please have the deponent review the
7 attached PDF transcript, noting any changes or
8 corrections on the attached PDF Errata. The
9 deponent may fill out the Errata electronically or
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11 Once the Errata is signed by the deponent and
12 notarized, please mail it to the offices of Veritext
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14 When the signed Errata is returned to us, we will
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19 above, the original transcript may be filed with the
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2 I, the undersigned, do hereby certify that I have
3 read the transcript of my testimony, and that

4 ___ There are no changes noted.

5 ___ The following changes are noted:

6 Pursuant to Rule 30(7)(e) of the Federal Rules of
7 Civil Procedure and/or OCGA 9-11-30(e), any changes
8 in form or substance which you desire to make to
9 your testimony shall be entered upon the deposition
10 with a statement of the reasons given for making
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13 necessary, please furnish same and attach.

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Grant, Annie Lois, et al.v. Raffensperger, Brad, E

Page 39

1 Page _____ Line _____
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21 DEPONENT'S SIGNATURE

22 Sworn to and subscribed before me this ____ day of
_____, ____.

23

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25 My Commission Expires:_____

[& - appreciate]

Page 1

&	2023 1:11	a	agreement
& 12:3	35:13	abandoned	35:10
0	206.565.0177	33:20	ahead 6:7
00122 1:6	3:8	able 11:21	18:18 21:4
1	2100 3:6	13:13,15 28:1	ailments 28:11
	2:57 1:12	above 37:13	al 1:3,8
10 21:20	3	absolute 35:11	allegations
12 12:16	30 37:3 38:6	access 26:25	19:13
13620 35:14	300 37:18	action 1:5 5:1	allowed 4:6
15-14-37 36:11	30076 37:19	35:7,10	almand 1:13
1600 3:12	30248 8:15	activities 16:21	35:16
1700 3:5	30339 3:14	22:7 23:4	amazing 13:7
17th 35:13	31st 8:21	additional 38:9	american 30:13
19 10:16	3:46 34:10	address 8:12,13	30:15
1956 10:16	4	8:17,20 9:5,8	americans
1960 9:1	4 2:6	10:21,22 15:13	29:20
1974 11:8	401 8:13	administrative	amount 33:1
1992 10:16	5	12:10	ancillary 36:12
1995 10:12	531 35:16	admitted 13:15	annie 1:3
1998 10:10	6	13:16,17	answer 4:10
1:22 1:6	678.336.7249	advocacy 17:18	5:17,20 26:5
2	3:15	affecting 26:23	28:17
20 37:17	7	affects 28:4	answers 5:10
200 3:13	7 38:6	32:19	34:6 35:3 36:4
2000 10:7,12	770-343-9696	african 29:20	appeal 29:1,10
2005 10:7,10	37:20	30:13,15	appeals 28:20
15:6 16:14	7th 3:5	afternoon 4:1	28:23,25 29:18
2015 13:5	9	ago 18:7 19:11	appearances
14:14,15	9 1:11	agree 5:4 6:3	3:1
2018 8:21 14:2	9-11-30 38:6	24:11	applied 36:11
14:15	98101 3:7	agreeable 4:12	appointment
2021 19:16,20		5:12	27:6,7
20:1 24:12		agreed 4:14	appreciate
2022 15:25		agreeing 32:17	28:18 34:5
17:23			

[appreciates - change]

Page 2

appreciates 34:7 areas 30:1 arling 30:19 arrangements 35:11 arrested 7:19 arts 23:9 aspect 29:11 assembly 19:18 assist 38:8 association 21:6,6,10,12 associations 21:2 22:7,16 atlanta 1:2 3:14 attach 38:9 attached 36:5 37:6,6 attempt 32:11 attend 18:8 19:22,25 attorney 4:25 7:24 8:2 18:9 18:19,22 33:25 35:6 37:11 attorneys 18:15 18:25 36:6 audible 5:10 august 8:21 automatically 36:11 available 5:23 36:9,12	avenue 3:5 aware 31:22 32:1	boarded 33:13 body 30:21,24 born 10:17 brad 1:6 4:3 break 5:17,21 breakfast 23:6 brentwood 11:20 brings 32:23 buck 8:13,24 10:22 buckhead 30:2 buried 30:19 30:21,22,24 31:4 bus 27:21	carry 30:3 case 7:23 8:9 18:6,9,12,15 27:16 36:5,7 36:11 cases 7:11 caucasian 28:10 caucasians 29:9,22 causes 28:3 cell 5:24 6:3 cemetery 30:19 30:23,23,25 31:5 center 12:9 22:18 23:5,11 23:14 central 11:5,15 certain 29:1 33:8 certainly 6:1 certificate 35:1 36:1 certificates 36:8 certified 36:3,4 36:6,8 certify 35:2,5 38:2 change 38:11 38:13,15,17,19 38:21,23 39:1 39:3,5,7,9,11 39:13,15,17,19
	b	c	
	b 8:14,14 35:16 36:11 back 10:2 23:17 27:24 37:3 background 6:1 ballots 25:10 based 20:21,22 22:3 23:19,22 33:7,8 35:10 basically 20:23 bear 10:5 behalf 3:2,9 believe 26:6 bell 11:15 best 27:5 bet 23:3 better 33:6 big 31:9 bit 28:12 32:3 black 24:5 29:4 29:5,8 30:9 31:10,13,15,24 32:9,13 33:1 blacks 29:9 blog 21:16,16 21:19 board 4:5 8:14 8:24 10:22		

[changed - day]

Page 3

changed 15:3 20:11 25:21 changes 37:6 38:4,5,6 charged 7:17 check 25:16 chicago 9:23 10:11,12,13 12:5 children 20:22 choir 23:8 circle 3:12 citizens 22:18 23:4,11 city 9:21 10:8 civic 22:12 civil 1:5 4:6 38:6 claims 7:13,15 clapp 2:6 3:10 4:1,15,18,23,24 6:20 33:23 34:4 clayton 9:15 15:4 clearly 5:8 cleo 11:25 code 8:15 13:12 32:14 35:9 codes 13:16,19 13:19,20 college 11:9 13:3 colloquies 35:3 36:4	color 25:4 26:7 27:2,4 28:11 29:12 come 23:8 27:17 comes 23:8 26:13 commercials 29:3 commission 39:25 commitment 35:11 committee 16:19 communities 32:19,20,21 community 20:4,7,14,15 21:2 32:4 33:3 33:5 company 11:16 12:1,19 13:2 compensation 35:10 complaint 19:7 19:10,13 complete 5:16 36:4,6 completed 37:15 compliance 35:8 complicated 13:18	computer 6:2 concerning 18:11,14 20:1 concluded 34:10 conditions 7:5 conference 1:11 confuse 5:3 conner 1:10 4:2 4:19,24 6:10 6:21 8:13 33:23 34:4 37:2 consider 16:10 20:7 considered 16:24 contacted 18:19 context 28:20 contract 18:17 18:25 35:9 contractor 12:21 convicted 7:21 coordinators 36:3,8 copies 36:8 37:11 copy 36:6 correct 24:12 24:15,18 35:4 36:4,6	corrections 37:6 38:8 counsel 3:1 counselor 4:13 count 31:12 counties 27:22 county 8:22 9:4 9:6,11,14,15 15:4,9 20:16 27:21 35:2 course 31:2 court 1:1 5:7 35:12 36:5 37:14,17 covered 33:24 cpt 13:19 crafts 23:9 crc 1:13 35:16 crime 7:17,21 32:16,23 33:1 33:14 crr 1:13 35:16 current 8:12 15:13 customer 12:7 cv 1:6
			d
			d 8:14 date 25:18 37:3 daughter 11:1 12:23,25 13:1 22:19 day 25:8 27:5 35:13 39:22

[days - exhibits]

Page 4

days 37:3 deal 31:9 decide 13:3 defendant 4:3 defendants 1:9 3:9 5:1 democratic 16:11,19,22 17:3 24:3,6 democrats 20:20 department 14:6,16 dependent 27:20 deponent 37:2 37:5,5,7,8,14 deponent's 39:21 deposition 1:10 4:2,11 5:2,24 6:5,13,22 7:3,7 8:1,5 34:10 36:10 38:7 describe 20:14 29:17 desire 38:7 devices 5:23 devry 13:4,5 diabetes 28:13 diagnosis 13:19 13:20 dialysis 27:10 27:11,12,16	died 30:20 differ 32:5 dilapidated 32:13 33:12,21 direct 35:9 direction 35:4 disagreeing 32:17 disclosure 36:1 discount 36:12 discounts 36:11 discovery 4:5 discrimination 24:1 discuss 18:9 discussed 7:23 8:1 discussion 6:19 disqualify 35:8 district 1:1,1 15:15 20:11,17 20:18 25:21 districts 20:10 division 1:2 doctor 28:12 doctor's 27:6,6 documents 8:8 doing 12:25 13:19 14:7 drive 9:1,5,8 27:20 28:1,2 33:9 due 28:13 37:3 duly 4:20	duma 3:11 4:25	employee 35:6 employment 26:6,22 32:12 encouraged 25:13 english 3:11 4:25 entered 38:7 entirety 6:16 errata 37:3,6,7 37:8,10,12,13 37:15 38:1 especially 5:14 22:24 esquire 3:3,10 37:1 et 1:3,8 ethics 35:9 ethnic 30:1 ethnicity 20:19 eventually 11:10 everybody 27:4 evidence 35:5 examination 2:5 4:22 examined 4:20 example 13:14 except 4:8 exchange 19:3 exclusively 36:7 exhibits 2:1 36:5,7
		e	
		e 38:6,6 early 25:12,14 27:12 eat 23:6 economic 30:4 education 25:3 effect 15:16 either 20:12 26:17 elaborate 32:8 elected 31:16 election 4:4 7:11,14,14 15:18,22,23,25 17:3 24:14 25:8 27:5 31:8 31:13,25 elections 15:21 24:9,22 25:1 28:20 electronic 5:23 electronically 37:7 elementary 20:23 elias 3:4 eliminate 20:12 email 5:24 6:3 emergency 13:15 employed 32:25	

[experience - head]

Page 5

experience 25:23 26:22 expires 39:25 explain 25:7 28:22	file 1:5 37:11 filed 37:13 fill 37:7,7 financial 36:12 financially 35:6 find 25:20 firm 36:1 first 4:10 17:20 18:5,22 19:9 five 9:9 followed 12:13 following 38:5 follows 4:21 followup 31:20 foregoing 35:2 36:2 foremost 20:16 form 4:9 38:7,9 formal 21:12 forward 37:11 four 8:18 fraternity 22:9 friday 26:16,18 friends 25:24 full 8:12 fully 5:4 7:1,6 fulton 35:2 fun 23:10 furnish 38:9 further 35:5 36:5	general 16:2 generally 17:2 24:6 georgia 1:1,7 3:14 8:15 9:15 9:17 10:21 12:23,25 14:5 14:16,24 15:4 15:19 17:3 19:18,23 24:1 24:6,8 25:4 26:7,20 27:2 28:6,24 29:15 30:5 31:11,16 31:17 32:5 33:3 35:1 36:3 36:8 getting 27:20 30:24 give 5:10 10:1 19:6 given 6:21 35:5 38:8 go 6:7 11:4,9 13:3 16:3 18:18 21:4 25:16,18,20 26:1,3,15,18 27:6,12 28:12 33:15,16 going 4:8 22:2 23:15,17 25:19 27:8,15 28:11 31:19	good 4:1 20:19 22:24 27:9 29:6,21 30:3 30:15 government 24:1 graduate 11:7 graduated 13:4 granddaughter 12:24 grant 1:3 great 4:18 6:7 15:24 greetings 37:5 group 3:4 17:18 21:13,14 21:15 22:3 24:2 28:9 29:1 29:9 30:7 groups 26:23 28:5 grove 8:15 10:21 16:6 23:14 guard 12:2 guess 22:15
f			h
facebook 5:25 21:24 faces 30:12 facility 37:16 fair 17:2 33:4 faith 22:3 familiar 6:12 24:20,24 28:19 family 7:11 far 23:10 farmington 9:19,25 father 30:18 31:4 father's 30:21 30:24 february 1:11 14:13,14,15 35:13 federal 4:6 31:18 38:6 fedex 12:5,6,15 12:17 fee 18:17,24 feel 27:15 28:4 32:19 33:10,21 feet 30:14 field 12:11 13:22	ga 36:9 37:19 games 23:9		half 23:12 hand 5:18 handle 4:16 handled 36:7 hannah 3:10 4:24 5:19 head 5:11

[headquarters - license]

Page 6

headquarters 21:7,9 health 13:9,10 27:1,9,25 28:8 28:15 healthcare 27:3 healthy 28:2 hear 5:8 32:3 hearings 19:22 heart 28:14 held 16:15,18 17:12 helped 30:13 30:16 31:1,4,7 helpful 22:1 34:6 henry 8:23 9:6 9:11,13 15:9 20:16 herschel 31:20 high 11:4,5,10 11:12 hills 9:19 hired 18:9 hispanic 29:2 hispanics 29:3 29:8,10 history 14:23 hmm 10:5 home 9:3 27:17 27:24 homeless 33:16 homeowners 21:6,10,13	house 23:11 31:17 33:13,19 33:20 housing 32:12 33:4,11,12 how'd 17:24 huh 5:10 i illinois 9:23 imagine 31:12 impacts 35:11 impartial 35:12 impartiality 35:8 important 5:14 include 15:21 20:12 29:12 includes 21:21 including 5:24 income 14:8 30:7 incumbent 25:10 index 2:1,5 individuals 25:9 informal 21:13 21:15 information 13:9,10 32:18 instance 27:10 33:19 interest 20:4,7 35:7	interested 35:6 involved 7:9 22:6,12 issues 18:12 19:19,19 j job 12:13 14:11 14:18 26:14 29:23 jobs 11:25 join 18:1 23:10 jon 30:2 judge 27:7 k k 8:14 kansas 9:21 10:8 keep 6:1 7:1,6 22:2 25:4,17 25:25 26:6 27:1 kept 31:12 kidney 28:13 kind 13:7 14:9 17:17 18:8,17 18:24 22:9,21 32:18 kinds 23:3 knew 30:22 know 5:5,18,25 8:22 9:2 15:15 15:24 16:2 19:12 20:3 24:8 25:15	26:1,22 27:15 31:2,10,15 knowledge 23:25 l lack 25:3 26:6 26:25 27:3 lady 30:17 lane 8:14,25 10:22 lastly 5:22 late 17:22,22 17:22 law 3:4 lawsuit 17:21 18:1 lawsuits 7:10 lawyer 18:6 leadership 16:15 learn 17:20,24 22:21 learned 13:12 leave 12:17 14:18 led 24:12 left 11:19 26:18 legal 36:1 legislator 19:16 legislature 19:23 levi 12:3 library 16:4,5,6 license 15:3
--	---	--	--

[limited - neighborhood]

Page 7

limited 26:20 limiting 29:7 line 25:16 38:10,12,14,16 38:18,20,22 39:1,3,5,7,9,11 39:13,15,17,19 listed 18:3 litigation 19:4 19:7 litsup 36:9 little 28:12 32:3 live 8:24 9:13 9:24 10:8,13 11:1 20:11 33:16 lived 8:16 9:10 living 33:14,21 llp 3:4,11 location 16:2,7 locust 8:15 10:21 16:6 23:14 lois 1:3 long 8:16 9:7 9:10 11:17 12:15 22:21 23:15 27:7 longer 23:2 look 33:11 looking 20:23 loop 22:2 lot 13:13 25:12 26:12 27:25 28:11 29:22	32:16,23 loud 5:8 love 32:3 lower 30:4,6 lunch 23:6 m ma'am 24:24 made 7:13 35:11 mail 37:9 maintaining 35:8 major 31:23 majority 24:8 24:11 make 6:8 27:14 27:18 38:7 makeba 3:3 18:22 33:25 37:1 making 38:8,8 manager 12:9 12:10 mansell 37:17 manually 37:7 marked 2:2 mary 1:10 4:2 4:19 8:13 37:2 matter 35:8 mean 20:10 means 20:4,19 media 6:4 medical 7:5 13:12,14	medications 7:1 meet 5:17 21:7 21:18 meeting 18:8 meetings 19:25 member 7:11 16:11,25 17:11 21:4 22:3 members 4:4 24:2 memos 8:7 memphis 10:14 10:15,17 12:3 messaging 6:4 michigan 9:19 9:19,25 12:10 12:11,19 miles 23:12 military 30:18 30:23 millington 11:5 11:6 mine 25:25 minority 24:2 26:23 28:5,7 28:10 32:4,19 32:21 33:3 minute 10:2 missouri 9:21 10:9 mixture 20:19 mom 30:25 mom's 30:21	moment 6:8 19:6 monday 26:16 26:17 month 8:19 months 12:2 mother 30:20 30:22 31:4 move 8:19 14:22 moved 9:2 11:20 12:4,4 12:12 26:2 n n 1:13 name 4:24 8:12 12:19,21 16:5 18:4,23 23:13 25:9 named 18:22 necessarily 28:10 necessary 38:9 need 5:17,19 6:1 14:9 26:1 27:17 29:21,23 30:16 32:10,11 32:11 33:4,4,5 needed 25:20 26:3 33:24 needs 32:4,9 33:2 neighborhood 20:24,25 21:1 21:13,15,21
--	--	--	---

[neighborhood - personal]

Page 8

22:16 30:5 32:12,13 33:10 neighborhoods 21:20 30:6,7 32:10,10,24 33:1,9 nell 1:10 4:2,19 8:13 37:2 new 26:14 newspaper 17:25 18:2,4 nextdoor 21:23 21:25 nobody's 33:13 nodding 5:11 north 20:15,16 northern 1:1 notaries 36:3,8 notarized 36:8 37:9 notary 39:24 noted 38:4,5 notes 8:7 notice 6:12 noting 37:6 november 15:25 17:23	ocga 36:10 38:6 october 17:23 office 31:11,16 31:23 officer 35:12 offices 37:3,9 official 1:7 oh 10:3 okay 6:9,12,15 6:18,21 8:7,11 8:16 9:4,7,10 10:3,6,13,19,24 11:3 12:15 13:21 14:18 15:24 16:5 17:11,20 18:5 18:24 19:15 20:3,6,14,25 21:11,17 24:11 24:20 25:7,22 26:5,21,25 28:4,25 30:8 31:15,19 32:17 once 11:23,24 37:8 ones 28:7,8 onstar 12:21,22 open 6:2,4 26:15 opinion 20:21 20:22 24:5 25:3 27:1 32:5 32:22 33:3 opponent 29:22 29:25	opportunities 26:6,22 opportunity 28:15 33:14 opposed 5:9,10 ordering 37:12 organization 22:4,13 original 37:11 37:13 ossoff 24:15 30:2 outcome 35:6 outside 22:15 22:16 overall 9:11	participating 7:2,7 23:22 25:4 26:7 27:2 participation 19:4 24:3 26:23 particular 31:1 33:2 parties 31:24 35:12 36:11,13 37:12 party 16:11,16 16:19,22,25 17:12 35:6,9 36:12 passed 30:18 passion 28:18 paved 32:14 pdf 37:6,6 people 25:4 26:2,7 27:1,4 28:11 29:3,5,8 29:9,11,12 30:12 31:10,15 31:24 32:22,25 33:15,16 perfect 5:7 period 9:24 10:4 person 13:14 18:20 21:18 25:11 29:21,23 30:13,15 31:13 personal 23:25 25:22 26:21
o		p	
o 8:14 oakwood 9:1,4 9:7 objections 4:8 obligation 35:8 occasions 25:17		p.m. 1:12 34:10 page 2:6 38:10 38:12,14,16,18 38:20,22 39:1 39:3,5,7,9,11 39:13,15,17,19 pages 38:9 paid 19:2 paper 12:1 par 33:12 parkwood 3:12 part 20:16 participate 21:1 25:12,14 participated 16:21 17:17 participates 21:19	

[pertaining - represented]

Page 9

<p>pertaining 19:19,23</p> <p>phone 5:24 6:2 6:3</p> <p>place 16:3 25:16,19 27:18 27:23</p> <p>placed 18:4</p> <p>places 26:20 33:15</p> <p>plaintiffs 1:4 3:2</p> <p>play 23:9</p> <p>please 5:7,15 8:11 24:23 37:5,9,15 38:9 38:9</p> <p>political 17:12 17:14 23:22 31:23</p> <p>politics 25:5 26:8 27:2</p> <p>polling 16:3 25:15,19 27:18 27:23</p> <p>polls 26:15 28:2</p> <p>position 16:16 16:18 17:12 31:7</p> <p>possible 27:14</p> <p>poverty 29:8</p> <p>precinct 15:24</p> <p>prepare 8:4</p>	<p>pretty 13:18</p> <p>print 37:7</p> <p>prior 6:22 7:10 7:13 9:17</p> <p>probably 30:3</p> <p>problem 28:3 30:24</p> <p>problems 28:9 28:13,14</p> <p>procedure 4:7 38:6</p> <p>procedures 13:13</p> <p>proceeding 35:5,11 36:9</p> <p>process 23:22 24:3,21,25</p> <p>produced 36:3 36:7</p> <p>production 36:3,7,8 37:16</p> <p>professional 35:9</p> <p>program 13:5,7</p> <p>programs 23:7</p> <p>prohibited 23:18,21 36:10</p> <p>prohibits 27:4</p> <p>promoted 12:8 12:9</p> <p>property 33:18</p> <p>public 31:16 39:24</p> <p>purchased 9:3</p>	<p>purpose 4:5 5:2</p> <p>purposes 4:6</p> <p>pursuant 38:6</p> <p>q</p> <p>question 4:9 5:3,16,20</p> <p>questions 34:2 35:3 36:4</p> <p>quite 27:13 29:20</p> <p>r</p> <p>r 8:14</p> <p>race 23:19,23 29:11,12</p> <p>racial 28:19,23 28:25 29:10,17</p> <p>raffensperger 1:6 4:4</p> <p>reach 19:15</p> <p>read 6:15 13:13 13:15 18:1 25:9 37:5 38:2</p> <p>reading 17:25 19:11</p> <p>ready 34:8</p> <p>really 27:7 28:8 30:13</p> <p>reasons 38:8</p> <p>received 19:3</p> <p>receives 36:12</p> <p>recent 15:16</p> <p>record 6:19 8:12 31:21 35:4</p>	<p>redistricting 15:16 19:20,23 20:1,8,8,9</p> <p>reduced 35:4</p> <p>referring 21:5</p> <p>registered 14:23 15:1,3,7 15:10,12,19</p> <p>registering 23:18</p> <p>registration 14:23 25:18</p> <p>regular 30:25</p> <p>relate 8:8</p> <p>related 7:11,14 7:14 24:2 36:8</p> <p>relationship 35:7 36:10</p> <p>relative 35:5</p> <p>relocate 11:21</p> <p>relocated 12:23</p> <p>reluctant 26:17</p> <p>remember 11:19 15:1,5 17:8 18:21 30:17</p> <p>remote 1:11</p> <p>rep 12:7</p> <p>repeat 24:23</p> <p>reporter 5:7 36:5,6</p> <p>reports 36:12</p> <p>represent 4:25</p> <p>represented 31:24</p>
---	--	--	---

[represents - started]

Page 10

represents 36:2 36:5 republican 16:25 17:5 30:9 republicans 20:20 30:11 request 36:9,13 requirement 24:9,12 research 18:11 18:14 reserve 4:17 reserved 4:10 34:11 37:5 reside 9:16 resided 15:15 residents 28:5 32:6 resigned 11:22 11:23,24 resources 26:12 33:5 responsiveness 4:9 rest 27:17 resulted 24:14 retire 14:1 retired 13:24 14:2,4,19 returned 37:10 37:13 returns 14:8 revenue 14:6 14:16	review 8:4 37:5 reviewing 14:8 ride 27:20,23 27:23 right 6:9,10,25 11:3,10,12 14:22 22:15 23:17 33:23 37:5 room 11:2 13:15 roswell 37:19 rpr 1:13 35:16 rule 38:6 rules 4:6 38:6 run 31:11,21 running 31:14 runoff 16:8 24:12 rutahindurwa 3:3 4:14,17 34:2 37:1	22:6 23:8 schools 20:17 scj 1:6 screen 6:8,9,10 seal 37:11 seattle 3:7 second 5:19 secretary 1:7 4:3 security 12:2 see 6:9 12:20 25:16 seen 19:7 28:23 29:14 30:8 selecting 6:9 senate 31:18,22 senator 24:15 24:15 29:19,24 31:20 send 37:11,15 senior 22:18 23:4,11,14 serve 35:11 served 16:18 service 12:7 services 27:1 36:12 session 19:16 several 11:25 20:18 21:22 sew 22:19,22 share 6:8 show 30:12 sidewalks 32:15 33:6,11	sign 37:5 signature 4:16 4:17 34:11 35:14 37:2,14 39:21 signed 37:8,10 37:13 similar 30:8 sing 23:9 six 12:2 skip 30:6 slating 24:21 24:25 social 6:4 solely 35:10 solutions 36:1 sorority 22:10 sorry 18:18 sounds 23:10 south 11:15 12:11 southern 20:16 speak 5:8,15 speaking 20:25 special 15:21 19:16 specific 19:12 36:11 spend 22:17 spent 22:20 spoke 18:20 squatter 33:17 start 14:12 started 11:13 12:4,5,7 26:14
	s		
	safe 33:10,21 safely 10:4 safer 32:11 saturday 26:16 26:19,19 27:11 saw 19:9 29:18 saying 31:2 schedule 27:23 scheduled 27:13 school 11:4,5 11:11,12 20:23		

[state - typewriting]

Page 11

state 1:8 4:3,4 8:11 9:16 14:5 31:23 35:1 stated 35:3 statement 38:8 states 1:1 9:18 15:10 31:22 station 12:8,10 step 5:19 stipulations 4:12 stockbridge 9:1 strauss 12:3 streets 32:14 33:6 stuff 13:18 subcontractor 35:10 subdivisions 20:18 21:22 submitted 36:4 36:6 subscribed 39:22 substance 38:7 successful 29:5 30:12 suffer 28:8 suite 3:6,13 37:18 support 17:2 supported 24:17 sure 5:9 6:8 32:8 34:6	surrounding 21:21 swift 13:2 sworn 4:20 39:22 t take 5:20 6:13 10:6 26:15,17 27:8 28:15 taken 1:11 4:2 6:25 35:3 takes 22:21 talk 18:5 21:16 talked 18:21 tax 14:8 taylor 3:11 4:25 teaching 22:19 23:1 team 34:7 technology 13:9,11 telephone 11:16 television 5:25 telling 29:6 ten 9:12 tendency 30:11 tennessee 10:14 11:6,20 term 20:3 24:20,25 28:19 terminology 13:14	terms 35:10 testified 4:20 testify 19:18 testifying 10:19 testimony 6:22 38:2,7 text 6:4 thank 4:15 6:7 11:3 26:5 28:18 34:3,4 therefor 26:13 27:17 things 26:13 29:24 think 10:4 12:18,20 14:14 21:5 28:12 31:6 32:2,24 33:24 34:8 thinking 10:2 thorough 28:17 thoughtful 34:5 three 11:18 12:22 13:5 18:7 thursday 27:11 till 10:7 time 5:15,17 9:24 10:4,6 11:21 14:20 16:4 19:9 22:17,20,21 34:5 36:11 37:13	timeframe 10:1 times 30:5 today 7:1 8:4 10:20,25 33:24 34:5 today's 7:2,7 told 26:3 took 15:16 touched 32:2 train 14:11 training 14:9 transcript 35:3 35:4 36:3,4 37:6,11,13 38:2 transit 27:21 transportation 13:2 27:19 treatment 30:9 trial 4:10 6:23 troy 12:19 trucking 13:1 true 35:4 36:3 36:6 truthfully 7:2,6 try 5:10 trying 12:18,20 14:13 29:2,4 tuesday 27:11 27:13 two 8:14 19:11 23:16 31:17 typewriting 35:4
--	---	---	--

[u - zoom]

Page 12

u	veterans 23:7 30:19	wave 5:18	years 8:18 9:9 9:12 10:15 11:18 12:16,22 23:16
u 8:14	vote 14:23 15:2 15:8,12,19,22 15:23 16:4,7 20:9 23:18 24:6,9,11 26:15,18,19 27:12,13,14 28:3 29:2,4,21 30:16	way 8:8	z
uh 5:10	voted 15:18,25 17:5 26:3	we've 28:14	
unable 25:8	voter 14:22 17:18 25:8 26:23	website 18:3	zip 8:15 zoom 5:14 6:2
under 4:6 35:4 36:10	voters 24:5 25:18	week 23:7	
undersigned 38:2	voting 23:17 25:13,14 26:13 26:19	weeks 18:7 19:11	
understand 5:4	vs 1:5	weight 30:4	
understanding 28:22	w	went 11:10,24 12:18 13:4 18:3 26:2	
unemployed 26:11 32:23	wait 5:16	white 28:5 30:9 32:6,20,24	
united 1:1 31:22	walker 31:21	wide 31:23	
university 13:6	want 22:24 26:14 27:22 29:10 32:18	wish 4:16	
unsure 25:10	wanted 30:20	witness 36:6	
upkeep 33:6	warnock 29:19 29:24 31:20	words 8:14	
use 4:10 38:9	warnoff 24:15	work 11:14,24 12:18 26:16	
used 24:21,25 28:20	washington 3:7 29:25	worked 11:15 12:1,2,20,22 17:14	
uses 24:8		working 11:13 12:4,5 13:1,21 14:3,16	
usually 22:1 26:11 27:21 32:13,15		wrap 11:25 34:8	
v		wrapping 12:1	
valerie 1:13 34:8 35:16		y	
value 19:3		yeah 23:3 31:19	
veritext 36:1,2 36:5,10 37:9 37:16		year 8:19 11:7 13:5 14:1 15:5 17:22 31:8	
veritext.com. 36:9			

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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