

Grant, Annie Lois, et al.v. Raffensperger, Brad, Et Al.

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

ANNIE LOIS GRANT, et al., )  
)  
Plaintiffs, )  
)  
v. ) CIVIL ACTION FILE NO.  
) 1:22-CV-00122-SCJ  
BRAD RAFFENSPERGER, in his )  
official capacity as the )  
Georgia Secretary of State, )  
et al., )  
)  
Defendants. )

\* \* \*

Remote Videoconference Deposition of  
ANNIE LOIS GRANT

December 14, 2022

4:27 p.m.

By Marcia Arberman, CCR B-1059

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## E X A M I N A T I O N

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Examination by Ms. LaRoss

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## E X H I B I T S

Exhibit Description

Page

Exhibit 1 Notice of Deposition

8

1 APPEARANCES OF COUNSEL (all attendees via  
videoconference):

2  
3 On behalf of the Plaintiffs:

4 MAKEBA RUTAHINDURWA, ESQ.

Elias Law Group

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7

8 On behalf of the Defendants:

9 DIANE FESTIN LAROSS, ESQ.

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11 dlaross@taylorenghish.com  
12  
13  
14  
15  
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17  
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19  
20  
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24  
25

1 ANNIE LOIS GRANT,  
2 having appeared remotely before me and having been  
3 duly sworn, was deposed and testified as follows:

4 MS. LAROSS: This will be the deposition  
5 of Annie Lois Grant, taken by Defendants,  
6 Secretary of State Raffensperger and members  
7 of the State Board of Elections for purposes  
8 of discovery and all other purposes allowable  
9 under the Federal Rules of Civil Procedure.

10 All objections except those going to the  
11 form of the question and the responsiveness  
12 of the answer shall be reserved until trial  
13 or first use of the deposition, if that's  
14 agreeable with you, Counsel.

15 MS. RUTAHINDURWA: Agreed by counsel for  
16 Plaintiffs.

17 MS. LAROSS: Thank you. And would you  
18 like to reserve signature? Would your client  
19 like to reserve signature on the deposition?

20 MS. RUTAHINDURWA: Yes.

21 MS. LAROSS: Okay.

22 EXAMINATION

23 BY MS. LAROSS:

24 Q Good afternoon, Ms. Grant. I appreciate  
25 your time and all of the effort it took for you to get

1 on Zoom with us today.

2 A Thank you for bearing with me.

3 Q Of course. No problem. And if at any time  
4 you can't hear me or our sound -- you know, something  
5 happens, please just let us know. Wave your hand,  
6 which I have seen you able to do very well so far. So  
7 thank you.

8 As I mentioned Ms. Grant, I represent the  
9 Secretary of State and the State Board of Elections,  
10 who are the Defendants in the lawsuit that we're here  
11 about today. I'm going to go over just a couple of  
12 ground rules for your deposition.

13 And so I would start by just letting you  
14 know, it's important that you respond verbally to all  
15 of the questions. A nod of the head or an uh-uh  
16 (audio broke up) are normal in everyday conversation  
17 are hard for the court reporter to take down and  
18 transcribe accurately for your deposition.

19 You can't hear me.

20 MS. LAROSS: I don't think she can hear  
21 me.

22 (Off the record.)

23 BY MS. LAROSS:

24 Q Let me just begin again for the just general  
25 guidelines for your deposition, Ms. Grant. If you

1 could -- again, we need to respond verbally with a  
2 yes-or-no answer to the question so that the court  
3 reporter can take an accurate transcript. Is that  
4 agreeable for you?

5 A Yes.

6 Q Okay. Thank you. And I can hear you well.  
7 So thank you for that.

8 It's important that you and I don't speak  
9 over each other. So if you could wait until I  
10 complete my question before you begin answering, that  
11 would be very helpful so that, again, the court  
12 reporter can take an accurate transcript of all that's  
13 said today in your deposition. Is that also  
14 agreeable?

15 A Yes.

16 Q Thank you.

17 And it's not my purpose today at all to  
18 confuse you. If at any time you don't understand a  
19 question that I'm asking of you, just please let me  
20 know, and I will clarify it for you. Is that also  
21 agreeable to you?

22 A Yes.

23 Q Okay. Thank you.

24 And it's entirely fine if you need a break  
25 at any moment. Just let us know. The only request I

1 make with regard to that is if you would just let --  
2 if there's a question that I've asked you, if you  
3 could complete your answer first, and then we'll go  
4 ahead and take a break. Is that also agreeable for  
5 you?

6 A Yes.

7 Q Thank you.

8 And one last thing. If you could make sure  
9 that you turn off -- well, nope, you're going to have  
10 to keep your cell phone on. Never mind.

11 A Yes.

12 Q Usually we ask people to turn off their cell  
13 phone. Do not turn it off. We appreciate your having  
14 it on and running your audio through your phone. I  
15 just ask that you not have other, like, email or text  
16 messaging open during your deposition. Would that be  
17 agreeable?

18 A Yes.

19 Q Thank you.

20 MS. LAROSS: Makeba, if you could put up  
21 the Notice of Deposition.

22 BY MS. LAROSS:

23 Q Ms. Grant, we're going to show you on your  
24 screen the notice of today's deposition that we're  
25 going to have marked as Exhibit 1 to your deposition.

1 (Marked for identification, Exhibit 1.)

2 BY MS. LAROSS:

3 Q And it just shows that we were scheduled  
4 today to have your testimony.

5 MS. RUTAHINDURWA: Do you see that,  
6 Ms. Grant, showing on your screen?

7 THE WITNESS: I do.

8 BY MS. LAROSS:

9 Q Okay, great. Now, have you seen this notice  
10 before, Ms. Grant?

11 A Yes. I read it earlier.

12 Q Okay. So we're going to attach that to your  
13 deposition as Exhibit 1.

14 Ms. Grant, have you ever given a deposition  
15 before?

16 A Yes.

17 Q And how many times have you done that,  
18 ma'am?

19 A Once.

20 Q Okay. And what kind of case was that in?

21 A For the veterans.

22 Q And, just in general, what was your  
23 testimony about?

24 A The problem that my husband had as a  
25 veteran.



1 Q Okay. That's fine.

2 And were you and your husband parties to  
3 that case?

4 A I was a witness because I was his spouse.

5 Q Okay. And that's fine.

6 So other than that deposition, have you  
7 given any other depositions before today?

8 A No.

9 Q Ma'am, if you could lower your camera just a  
10 tiny bit. I've lost your face again.

11 Great. Thank you. We're going to be  
12 experts on this by the end of this deposition. I'm  
13 certain of it.

14 Okay, all righty. So have you ever  
15 testified at trial?

16 A Yes.

17 Q Was that also in your husband's case that  
18 you spoke about a moment ago?

19 A No.

20 Q What kind of matter did you testify at trial  
21 about?

22 A Grand jury in the county.

23 Q Okay. And that would have been in a  
24 criminal case, right?

25 A Yes.

1 Q And that case, does that have anything to do  
2 with elections?

3 A No.

4 Q Other than that, have you testified in any  
5 other case at trial?

6 A No.

7 Q Some of these questions we have to ask  
8 everyone, so I need to check with you. Have you taken  
9 any medications that may keep you from fully and  
10 truthfully participating in the deposition today?

11 A No.

12 Q And, also, do you have any medical condition  
13 that might keep you from fully participating in the  
14 deposition today?

15 A No.

16 Q Have you or a family member ever filed a  
17 lawsuit in any election-related case other than the  
18 one we're here about today?

19 A No.

20 Q Have you or your family members -- has  
21 anybody made a claim in any election-related matter  
22 with the State Board or any other entity, the County  
23 Board? Anything along those lines?

24 A No.

25 Q And, Ms. Grant, have you ever been charged

1 with a crime?

2 A No.

3 Q So I would understand that you've not been  
4 arrested then or convicted of a crime; is that  
5 correct?

6 A That's correct.

7 Q Okay. Again, I have to ask everyone these  
8 questions.

9 Okay. So did you discuss this case with  
10 anyone other than your attorney?

11 A No.

12 Q Have you discussed the deposition with  
13 anyone other than your attorney?

14 A No.

15 Q And what did you do to prepare for today's  
16 deposition, if anything? And that would be, of  
17 course, other than speaking with your lawyer.

18 A Other than speaking with my lawyer, nothing.

19 Q Okay. Do you have any notes or documents  
20 that you've made that relate in any way to this case?  
21 And I mean -- and I'm not including the documents or  
22 any documents that your attorney has sent to you.

23 A Is there any way you can explain that  
24 question?

25 Q Of course. It was very complicated.

1 Have you made any personal notes that relate  
2 to this case?

3 A No. Like written notes?

4 Q Yes. Exactly.

5 A No.

6 Q Or any notes on the computer?

7 A No, other than just writing down things, you  
8 know, just from memory as I was out working. I really  
9 don't understand what type of notes that you're  
10 talking about.

11 Q Sorry. Yes. I just mean anything about the  
12 claims that you've made in this case, about the  
13 lawsuit itself, or the circumstances of redistricting  
14 that pertain to the issues that you've raised in the  
15 lawsuit. Does that help explain what I'm looking for?

16 A That question, I guess I would say yes.  
17 I've made notes for myself.

18 Q Okay. And do you have your notes with you  
19 there today?

20 A Not that's within my reach.

21 Q Okay. Ms. Grant, what is your current  
22 address?

23 A [REDACTED] Union Point, Georgia

24 [REDACTED]

25 Q And is that the address where you're

1 located, giving your deposition today?

2 A Yes.

3 Q Is there anyone else in the room with you  
4 right now?

5 A No, no.

6 Q And you mentioned that your address -- I  
7 think you said that it's in Union Point. Do I have  
8 that correct?

9 A Yes.

10 Q And, ma'am, is that in Greene County?

11 A Yes.

12 Q How long have you lived at that address?

13 A Ooh. 49 years.

14 Q Are you originally from Georgia?

15 MS. LAROSS: We've lost her video.

16 THE WITNESS: Yeah. Sure did. It went  
17 out.

18 MS. LAROSS: Oh, boy.

19 THE WITNESS: Yeah, it went out.

20 THE REPORTER: Do you want to go off the  
21 record of...

22 MS. LAROSS: Let's just go off the  
23 record just for a moment.

24 (Off the record.)

25 (The record was read.)

1 A Yes.

2 BY MS. LAROSS:

3 Q And what county were you born in?

4 A Greene County.

5 Q Was that also in Union Point?

6 A No.

7 Q Okay. Where were you born in Greene County?

8 A Siloam, S-I-L-O-A-M, Georgia.

9 Q And how long did you live at Siloam?

10 A From birth to college.

11 Q And I'll ask you about your education. But  
12 after college, is that when you moved to Union Point?  
13 Or where did you move next after Siloam?

14 A After college I met my husband. We were  
15 married. Lived in Decatur, Georgia, until he was  
16 drafted in the service.

17 Q How long did you live in Decatur, Georgia?

18 A I would say in Decatur -- because I was  
19 living in Decatur when I was in college, I would say  
20 maybe 14 years, 15 at the most.

21 Q Okay. And this isn't a test of your memory.  
22 Your best estimate is helpful here.

23 So after that period of time living in  
24 Decatur, where did you live next?

25 A My husband, he went to Okinawa,

1 Camp Pendleton. And then the longest time was in  
2 Camp Lejeune, North Carolina, and back to Georgia.

3 Q And when he came back to Georgia, is that  
4 when you began living in Union Point?

5 A No. My husband's first teaching job was in  
6 Hancock County. So we lived in a little town called  
7 Mayfield, Georgia, for about four years and then had  
8 our home built here.

9 Q And as I understand it then, you've lived in  
10 that home ever since?

11 A Yes.

12 Q And that would be at the -- I think you said  
13 it's the [REDACTED] address.

14 A [REDACTED], Union Point,  
15 Georgia.

16 Q Okay. Thank you.

17 And you mentioned that you and your husband  
18 had built that home. Do you own that property?

19 A Yes.

20 Q Is that your sole residence?

21 A Yes.

22 Q I'm going to ask you a few questions now  
23 just about your education generally. You spoke about  
24 college. So let's go ahead and -- let's see. Okay.  
25 So where did you go to high school? We'll start

1 there.

2 A F. T. Corry High School in Greensboro,  
3 Georgia.

4 Q And from there did you go on to college  
5 right away, or did you not go right away?

6 A Well, a couple of months would be right  
7 away.

8 Q Yes.

9 A Yeah. I went down to Augusta only for  
10 six months. And then I had to leave because my dad --  
11 well, that's another story. I went from Payne down to  
12 Atlanta, to Demorest Business School for two years in  
13 Atlanta, to Fulton County. And after that I met my  
14 husband. I was in Atlanta Junior College for two  
15 years.

16 Q And what agrees -- sorry. What degrees did  
17 you obtain during your college education?

18 A At Demorest Junior College, that was a  
19 business degree, a two-year associate's degree. And I  
20 didn't complete Atlanta Junior College because we were  
21 married and I left. I continued my education in later  
22 years at University of Georgia, Continuing Education,  
23 as a special education teacher.

24 Q Okay, great. I'm just going to ask you this  
25 generally. So what years did you attend Atlanta



1 Junior College?

2 A I would have gone there in '63.

3 Q Okay. And what years did you attend the  
4 University of Georgia in special education?

5 A That would have been in the eighties.

6 Q And did you complete your degree in special  
7 education at the University of Georgia?

8 A The continuing ed, yes.

9 Q Were you going to school part-time or at  
10 night?

11 A Part-time.

12 Q And did you graduate bachelor of arts in  
13 special education?

14 A No. I just received my associate's from  
15 there.

16 Q Okay. After that, any other formal  
17 education?

18 A Continued to take classes because we opened  
19 up our own daycare preschool in Greensboro, Georgia.

20 Q And when did you open the daycare in  
21 Greensboro?

22 A I think it was eighty -- maybe '85. Maybe.

23 Q Okay. So any other formal education other  
24 than what you've described for us?

25 A No, other than there are times when I would

1 go back and be recertified just to be able to -- I  
2 really became a paraprofessional until they had a RIF  
3 in the school system. Now I'm back as a substitute.

4 Q Okay. Your video came back on.

5 A Yeah. I could see you, but I couldn't see  
6 your mouth moving, but I could hear you.

7 Q Oh, okay. Was I too low?

8 A Now it's good.

9 Q I'm sorry. I don't want you to not hear me.  
10 Okay. But I'm very glad to see you.

11 Okay. So you mentioned that you've gotten  
12 some certifications related to your child care  
13 business. Do I understand that correctly?

14 A Yeah. But that was in the late seventies  
15 and early eighties. It wasn't until I closed the  
16 center that I began to teach in the school system.

17 Q When did you close the center?

18 A It was in the nineties. I'm not sure what  
19 year. I'm not sure what year.

20 Q Do you have any other licenses or  
21 certifications?

22 A No.

23 Q Are you a member of any -- lost your video  
24 again. It will come back again. Just let me know if  
25 you can't hear me. Can you see me?

1           A       I can't see you, but I can hear you.

2           Q       Okay, all right. We'll continue, and then  
3 hopefully you'll come back for us.

4                   There you are back again.

5           MS. RUTAHINDURWA: I'm going to take  
6 this opportunity -- I think it's probably an  
7 unstable connection on Ms. Grant's part. But  
8 because she's on her phone, we're able to  
9 continue on. So if we can just maybe  
10 stipulate to the fact that she is where she  
11 is alone and try to keep this going, and,  
12 hopefully, she'll just come in and out, if  
13 that's okay with you.

14           MS. LAROSS: That's entirely fine.

15           MS. RUTAHINDURWA: Thank you.

16           MS. LAROSS: I'm just hoping that she'll  
17 come in and out, and that would be fine.

18           MS. RUTAHINDURWA: Great.

19           MS. LAROSS: Yeah. I totally  
20 understand. And my Internet at home is very  
21 unstable. Here it's less unstable. But,  
22 anyway. So, yes, of course, that would be  
23 fine.

24           MS. RUTAHINDURWA: Thank you.

25           MS. LAROSS: You're welcome.

1 BY MS. LAROSS:

2 Q And, Ms. Grant, let me ask you this. So you  
3 mentioned that when you closed the daycare center, you  
4 taught in school. So tell me about that.

5 A Well, I'm trying to understand -- you know  
6 what education is. So, I mean, I've always loved  
7 children, worked at many daycares even while I was in  
8 school, worked in a hospital in the infant care. So  
9 that's always been my desire.

10 So working in the schools, I was always a  
11 teacher's assistant, working mainly with children with  
12 disabilities. Whatever the job details -- as a  
13 teacher's -- at that time they called them teacher's  
14 aides. I did have a group of students that I taught  
15 on my own. And now they call us paraprofessionals.

16 Q Okay. And was there a particular grade that  
17 you taught?

18 A Yes. Mainly elementary.

19 Q Okay. Would that be K through 8? Or what  
20 grades is elementary?

21 A Yes. At that time it was K through 8.

22 Q Okay. And tell me what schools that you  
23 worked for.

24 A The first one was Union Point Elementary  
25 here in Union Point, Georgia. I also taught as a

1 long-term sub in Hancock County. So I taught quite a  
2 few places. But the next one is Greensboro Elementary  
3 where I was for most of the rest of the time. That's  
4 where I was when they had the RIF, and 38 of us lost  
5 our jobs. So now I'm just back mainly from the middle  
6 school to the high school as a long-term sub.

7 Q Have you retired from teaching, or are you  
8 still teaching today?

9 A Forced retired through the RIF.

10 Q And when was that, ma'am? What year?

11 A The year that I lost my husband, which would  
12 have been 2005.

13 Q I'm so sorry about that, ma'am.

14 Since 2005 have you had any other  
15 employment?

16 A After I lost my job in the school, I worked  
17 for the City of Greensboro as a receptionist for about  
18 two years before I went back into the school system as  
19 a substitute.

20 Q How long did you serve in the school system  
21 as a substitute?

22 A I went back in 2010. So I've been there --

23 Q And -- excuse me. I'm sorry. I think I  
24 interrupted you.

25 A Yes, as a sub, as a substitute. And I'm

1 still doing that. Sometimes it's long-term. Other  
2 times it's almost every day, whenever a teacher is  
3 out.

4 Q And do you serve as a substitute in  
5 elementary school?

6 A Both. Elementary and high school. Wherever  
7 I'm needed.

8 Q Okay. So is it the kind of check that  
9 you'll sub at various different schools in your  
10 district, or is there one school in particular where  
11 you serve as a substitute?

12 A No. I'm signed up for either school.

13 Q And so you'll -- and I think you mentioned  
14 that you -- do you do elementary school -- sorry. Do  
15 you substitute at elementary school and at high  
16 school?

17 A From pre-K through elementary.

18 Q Okay. So not high school then?

19 A Well, at first you didn't ask me about high  
20 school, but I said -- wherever they call me. It can  
21 be pre-K. It can be the elementary school or the high  
22 school. That's the way they do their subs. That's  
23 our training.

24 Q Okay. And as a substitute do you work in  
25 the area of special needs? Sorry. Let me start

1 again.

2 As a substitute do you work with special --  
3 I just lost the video for a second. Sorry about that.

4 If I could just ask the question again. And  
5 I'm sorry if you've already answered. You said you  
6 serve as a substitute. Do you work with disabled  
7 children?

8 A I am this week. And I did also last week.

9 Q So sometimes it's with disabled children and  
10 sometimes not?

11 A Sometimes it's with the regular and  
12 sometimes it's with the MOID. As I stated before,  
13 wherever I am needed. I've had the training, I follow  
14 the teacher's plan, and I sub wherever I'm needed,  
15 whatever grade it is, whatever school it is in this  
16 county.

17 Q Thank you for your service as a teacher. I  
18 know it's absolutely invaluable to have teachers that  
19 can substitute in and cover the other teachers and  
20 keep the kids going. So, yeah, that's really  
21 admirable.

22 Okay. Let's see. So I'm just going to ask  
23 you some questions about voting in general. And so  
24 are you registered to vote in Georgia?

25 A I am.

1 Q And where did you register to vote first in  
2 Georgia?

3 A In Fulton County.

4 Q And are you registered to vote at your  
5 current address?

6 A I am.

7 Q And do you know what Senate district you  
8 lived in before redistricting?

9 A I do want to say since I've been here, I was  
10 in (audio broke up).

11 THE REPORTER: I'm sorry. You said,  
12 "Since I've been here, I was in" what?

13 THE WITNESS: The question she just  
14 asked is -- I really need her to reframe what  
15 she's asking me.

16 BY MS. LAROSS:

17 Q Okay, that's fine. Yeah. I'm happy to  
18 clarify that for you.

19 I understand that you currently reside in  
20 Senate District 24. Does that sound correct?

21 A Yes, yes.

22 Q Okay, great. And also you reside in State  
23 House District 124; is that correct?

24 A House District 124.

25 Q Okay, great. And for the Senate district,



1 were you in Senate District 24 before redistricting,  
2 or were you in a different district?

3 A Different district. I can't remember now  
4 what it was, but it was different because I was moved  
5 from my district, yeah.

6 Q Okay. And then is that the same with your  
7 state house district? I know you're in 124 now. Were  
8 you in a different district before redistricting?

9 A Yes.

10 Q And getting back to voting in general, have  
11 you voted in each election since you've been  
12 registered here in Georgia?

13 A I have.

14 Q Okay. So would that include -- have you  
15 voted in all primaries?

16 A Yes.

17 Q Presidential primaries as well?

18 A Yes.

19 Q Okay. And all general elections in Georgia  
20 since you registered here in Georgia?

21 A Yes.

22 Q And all special elections since you've  
23 registered in Georgia?

24 A Yes.

25 Q Okay. And it's obvious from that --

1 THE REPORTER: Now I froze. You said,  
2 "It's obvious from that."

3 BY MS. LAROSS:

4 Q Okay. Let me start the question again. I  
5 will strike that question, and we'll start another  
6 one.

7 I would understand then that you voted in  
8 the November 2022 election. Would that be correct?

9 A Yes.

10 Q And did you also vote in the recent runoff  
11 election?

12 A Yes.

13 Q Have you ever voted in any other state?

14 A No.

15 Q Have you voted in any other county other  
16 than Greene County?

17 A Yes. When I first registered, I was in  
18 Fulton County. And I'm sure I voted in DeKalb County  
19 also.

20 Q Ms. Grant, do you consider yourself a member  
21 of the Democrat Party?

22 A I do.

23 Q And since when have you been a member?

24 A Since the first time I registered.

25 Q And have you held any leadership positions

1 in the Democratic Party?

2 A Yes.

3 Q And what are those, ma'am?

4 A First I was voted in as an executive member,  
5 and now I'm the chair of our Greene County Democratic  
6 Party.

7 Q How long have you been the chair of the  
8 Greene County Democratic Party?

9 A I'm thinking 11 years.

10 Q Other than being chair, have you served in  
11 any other positions in the Greene County Democratic  
12 Party?

13 A I was elected a state committee member.

14 Q Anything else other than what you've told us  
15 about in terms of your work with the Greene County  
16 Democratic Party?

17 A No.

18 Q Have you worked with the Democratic Party of  
19 Georgia?

20 A As a state committee member, yes.

21 Q Okay. And when were you a state committee  
22 member?

23 A I'll be going into my third term, I think.  
24 I can't remember when I was elected.

25 Q Okay. And that was an elected position, I

1 think you said?

2 A Yes, by our committee members.

3 Q And you said that it's your third term. So  
4 how long is a term of office?

5 A Well, this is not a presidential election,  
6 and we have to hold another election. Normally it's  
7 three years. Two to three years.

8 Q Any other positions with the Democratic  
9 Party other than what you've described for us?

10 A No.

11 Q Okay. Have you ever considered yourself a  
12 member of the Republican Party?

13 A No. I voted Republican once.

14 Q And when did you vote Republican?

15 A I can't remember the year, but I remember it  
16 was for the mayor of Atlanta. And that's when I was  
17 in college. I can't remember the exact year.

18 Q Do you remember which candidate you voted  
19 for?

20 A I know it was the mayor. I just can't  
21 remember his name. I've been trying to think about  
22 it, but I can't.

23 Q Okay, all right. No problem. As I said,  
24 it's not a memory test. The best you can recall is  
25 fine.

1                   Was that candidate -- was that candidate  
2                   white or black?

3                   A       He was white.

4                   Q       And it was a male, I think you said?

5                   A       Yes. The mayor. The seat for the mayor of  
6                   Atlanta. Fulton County.

7                   Q       Okay. And did the mayor -- sorry. Let's  
8                   strike that.

9                   The candidate that you voted for for mayor  
10                  that you just described, did he win the election for  
11                  mayor?

12                  A       He did.

13                  Q       I think you mentioned that you voted for him  
14                  when you were in college. Do you remember what school  
15                  you were attending?

16                  A       At that time I think I was at Demorest  
17                  Junior College -- Business College.

18                  Q       Okay. Have you voted for any other  
19                  Republican candidates since --

20                  A       No.

21                  Q       -- you've been voting in Georgia?

22                  A       No.

23                  Q       Thank you. And have you worked on any  
24                  political campaigns?

25                  A       No, other than local, for local candidates.

1 Not really working. Just -- I don't know what you  
2 mean by working because I go door-to-door. I do  
3 educational information. So when you say working,  
4 most of the time people think you're getting paid, so  
5 I don't know what you mean by that.

6 Q Okay, yeah. So I do mean either paid or  
7 unpaid, you know, as a volunteer.

8 Let me ask this question, if I may. You  
9 mentioned activities that you've done. You've gone  
10 door-to-door, and you mentioned a couple other  
11 activities. Were those in connection with your -- the  
12 positions that you've held with the Democratic Party,  
13 or were those activities in connection with a specific  
14 candidate's campaign?

15 A It was volunteering for candidates during  
16 the election.

17 Q Okay. And what candidates have you  
18 volunteered for?

19 A Well, each time that we have a Democratic  
20 candidate running -- of course, there are those of us  
21 who are Democrats. And I, as one, go out, educate  
22 people on who the person is, their platform. And  
23 that's what we do. That's what I do.

24 Q And how many candidates would you -- sorry.  
25 Go ahead.

1           A       Mainly just doing what everybody does:  
2       Volunteering to get the word out to people and get  
3       them ready to vote or giving them educational  
4       information about whatever candidate they want to know  
5       about. It doesn't have to be a Democrat. I share  
6       (audio broke up) of what's going on.

7           THE REPORTER: My screen froze. I don't  
8       know if anybody else's did. Did anybody  
9       else's screen freeze?

10          Okay. "I share" -- something -- "of  
11       what's going on." That's what I have.

12          MS. LAROSS: "I try to stay abreast of  
13       what's going on."

14          THE REPORTER: Okay.

15          MS. LAROSS: I believe that was actually  
16       the last sentence that she said.

17          THE REPORTER: Okay. Thank you.

18       BY MS. LAROSS:

19          Q       So you mentioned that you've given -- you  
20       give folks information about the candidates and that  
21       you have given information concerning Republican  
22       candidates. How often have you done that?

23          A       Ma'am, I have no idea. If anyone asks me, I  
24       try to stay abreast of what's going on, where it's  
25       with a Democratic candidate or with a Republican

1 candidate because you have people who want to ask and  
2 they want to know. If they don't know, they ask. And  
3 if I have information or a website they can go to, I  
4 give it to them. I don't discriminate when it comes  
5 to that.

6 Q Okay. How long have you been doing that,  
7 going out and educating folks about candidates?

8 A All I can tell you, I've been doing it a  
9 long time. I don't know how many years it's been. I  
10 just can't keep up with how many years I've done  
11 certain work because I'm constantly educating people  
12 of anything that I learn, anything they want to know  
13 about that I know about, or where I can tell them to  
14 get information. So when it comes to how long, I have  
15 no idea. I've been doing it a long time.

16 Q Yeah. It sounds like it's the teacher in  
17 you that is doing that.

18 Okay. And so I think you mentioned that  
19 that work was for local candidates. Am I correct  
20 about that?

21 A What I told you was we also -- you asked me  
22 a question about who had I worked for. And I wanted  
23 to clarify. I don't work. I volunteer. But we did  
24 have three local candidates running in the last  
25 election that I also did the same thing for.



1 Q Okay, all right. Have you done that for any  
2 statewide races?

3 A Yes. We do it too for them.

4 Q Okay. And which races? Was that governor  
5 or U.S. Senate or president?

6 A Whatever election is coming up, I begin to  
7 learn as much as I can. I stay on conference calls.  
8 I search information, and I just share it. I mean, as  
9 the chair of the Democratic Party, that's part of my  
10 job.

11 Q Okay. Do you participate in any voter  
12 advocacy groups?

13 A Repeat that.

14 Q Do you participate with any voter advocacy  
15 groups?

16 A No. I mean, it's depending what you mean by  
17 participate. I get information.

18 Q So you get information from them. Is that  
19 what you meant?

20 A I get information from all candidates, I  
21 mean, whether it's by mail or sometimes by phone  
22 calls. Sometimes it's through the media. But I think  
23 we all get information.

24 Q Ms. Grant, I'm going to ask you some  
25 questions about this lawsuit. When did you first hear

1 about this lawsuit?

2 A Well, let me back up to how interested I was  
3 in all this redistricting that we've had done here in  
4 our county over the years. Being in one district and  
5 then pulled out of that one into another one, looking  
6 at the district lines and how they were being drawn, I  
7 got very interested in why. So I questioned -- I  
8 always went to meetings and asked questions to try to  
9 understand.

10 So I just became involved in why certain  
11 things was happening and why it was so difficult even  
12 to find candidates -- and I don't want to use the word  
13 "qualified" but candidates in a district -- a strong  
14 district, and especially for African-Americans, I  
15 mean, just being truthful.

16 So I really -- it's just who I am and what I  
17 do. I don't bring up a big fuss. I just do it.

18 Q Okay. So when did you first learn about  
19 this lawsuit in particular?

20 A Well, when we had -- I hate to use the word  
21 "gerrymandering," but it comes down to that -- then I  
22 began to hear a lot and learn a lot. And I think I  
23 received a phone call because we had had this big  
24 thing going on here with the redistricting during that  
25 time, and I'm sure that's how I got into it. I think

1 I answered a phone call. I do not know who I received  
2 that phone call from.

3 I'm sure at some point I would have spoke  
4 with people who were on -- with the state Democratic  
5 Party, these issues would come up. So we would just  
6 get involved and concerned.

7 So I think I received a phone call, and it  
8 was like a survey, sort of. And my opinion was asked,  
9 and I gave my opinion. And that's how I got involved.

10 Q Okay. And would that have been, let's say,  
11 after the 2020 census?

12 A No. Well, really, this happened before.

13 Q Okay. Do you remember around --

14 A They were concerned about the census, but I  
15 was interested in all this redistricting before then.  
16 So it had to have been -- when I actually got involved  
17 with this, I would say it was during 2021. And there  
18 wasn't any particular thing going on. It was just  
19 that, as I just said, the redistricting was something  
20 that was important to a lot of us.

21 Q So do I understand what you said? And  
22 correct me if I'm wrong. I may have misunderstood. I  
23 think you'd mentioned that you first learned about the  
24 lawsuit sometime in 2021; is that correct?

25 A I think it was before then. I'm thinking

1 '20. I'm not sure.

2 Q Okay.

3 A I'm really not sure.

4 Q Sure.

5 A All I can tell you is it was being  
6 discussed. Even at meetings, commission meetings,  
7 people were concerned. They were being pulled out of  
8 one district into another one, so there was  
9 conversations going on.

10 So I can't remember exactly who contacted me  
11 at first. I just remember that I gave my opinion on  
12 what was happening here in Greene County. So with  
13 that, I was asked to join this lawsuit, as if I would.  
14 And of course I said yes.

15 And if you want to know -- so you won't have  
16 to ask maybe -- an attorney met me in Greensboro,  
17 Georgia, at McDonald's. And I signed the paperwork.

18 Q Do you remember the name of that attorney?

19 A I don't.

20 Q Do you know if that attorney is part of the  
21 law firm that currently represents you?

22 A I don't.

23 Q Okay. And you said that you signed up with  
24 an attorney at McDonald's. So the agreement with your  
25 attorney when you hired the attorney, that was in

1 writing?

2 A I didn't hire anyone.

3 Q Okay. So what's your understanding of the  
4 paperwork that you signed?

5 A That I would be a part of the lawsuit, of  
6 the redistricting or the gerrymandering, whatever you  
7 want to call it. And I had decided I would agree to  
8 be a part of that. And that's how I got to be a part  
9 of it.

10 Q Okay. And I think you mentioned that --  
11 well, let me strike that and ask this --

12 You mentioned that you were at meetings  
13 where redistricting was being discussed. Were those  
14 meetings that were in connection with your service as  
15 chair of the Greene County Democratic Party?

16 A Not necessarily. Most of them was at the  
17 Commissioner's Office at their meetings. And  
18 different people were getting up and asking questions  
19 and trying to understand why it was happening.

20 So I was just doing what a normal citizen  
21 would do, wanting to know why this happened, you know,  
22 and really looking at what it was doing to a lot of  
23 citizens and voters. So that's just it, you know,  
24 being concerned. It had nothing to do with me as the  
25 chair of the Democratic Party. I never spoke at a

1 meeting like that as a chair of the Democratic Party.

2 I always signed in as Annie L. Grant.

3 Q Okay. So they were meetings pretty much  
4 with -- mostly with the Commissioners, and you signed  
5 in as a citizen. Would that be fair?

6 A Yes.

7 Q And when you talk about the Commissioners,  
8 do you mean the Greene County Commissioners?

9 A Yes.

10 Q Okay. And what made you decide to sue the  
11 Secretary of State and the State Board of Elections?

12 A Because in looking at the way it was drawn,  
13 it was gerrymandering. I mean, it was really hurting  
14 a lot of people in the rural areas.

15 I don't know how to explain to you how you  
16 feel when you hear people say, why is this happening,  
17 I won't be able to vote. And I do have to explain to  
18 them, yes, you can vote, but now you're in a different  
19 district, you're not in the same district you were in.  
20 And people want to know why.

21 So you have to have some reason to tell them  
22 because these are voters, these are citizens, these  
23 are people who are concerned. Well, anyone would be  
24 concerned when changes are made.

25 Q The folks that were expressing their concern

1 to you, were they connected with any party?

2 A I just stated they were regular citizens.

3 A lot of people know me not from the chair.  
4 They just know me. I was born and raised here. I've  
5 always been active, supporting people, supporting  
6 different organizations or missions, different things.

7 So I just get questions. And when I get  
8 questions, I try to find answers. And I always tell  
9 people, you know, call your commissioners, go to the  
10 meetings.

11 Q And concerning the lawsuit that we're here  
12 about today, what do you hope the lawsuit  
13 accomplishes?

14 A You make it more easier to vote. It used to  
15 not be like this. Absentee ballots now, applications  
16 are harder. People that live in these really rural  
17 areas, dirt roads, the elder people that want to  
18 vote -- always want to vote -- a lot of them are  
19 hindered. We didn't have Saturday voting this time.  
20 People work two jobs. These are the types of things  
21 that come to me, you know. And people are upset.

22 And so my whole thing is -- whether it's a  
23 lawsuit or just trying to find out what's going on,  
24 why is it happening, what -- you know, some answers.

25 So I just want it to be fair. That's all.

1 That's all I ask, is that when the redistricting is  
2 done that you don't come to a conclusion after you  
3 look at what has happened.

4 And you're out here working and you find out  
5 that a creek had split people, that they're in a  
6 different and a harder -- it's hard to find people to  
7 participate and to get involved, especially people of  
8 color. And I have to say that because that's the way  
9 I feel.

10 And I'm hoping any lawsuit where  
11 gerrymandering or the redistricting over and over or  
12 making it harder for people to voice their opinion  
13 will take a step back and look at actually the outcome  
14 of what is being done.

15 Q And I'm not asking you for a legal opinion.  
16 I just want to know what your understanding as a party  
17 in the lawsuit is. What is your understanding of the  
18 claims that you're making in the lawsuit?

19 A Me, myself, along with others with their  
20 opinions to me and talk, I feel like it's unfair that  
21 we have to go through this redistricting and  
22 gerrymandering without a voice, without an  
23 understanding, and not finding out what had been done  
24 till after it's been done. I just feel like everyone  
25 should have a voice in what is going to affect them.



1 And I know here in this county, it has  
2 really affected -- it's a disadvantage. Let me put it  
3 that way.

4 Q Have you reviewed the complaint in this  
5 case?

6 A I have.

7 Q Okay.

8 MS. LAROSS: And, Makeba, if we could  
9 put in the -- I believe it's the Second  
10 Amended Complaint. It's the current  
11 complaint.

12 BY MS. LAROSS:

13 Q She's going to share her screen with you.

14 MS. LAROSS: And if you could --

15 MS. RUTAHINDURWA: Sorry. Give me one  
16 second.

17 MS. LAROSS: Yeah, okay. Of course.  
18 You seem to be the person who's best with  
19 technology so far, so...

20 MS. RUTAHINDURWA: All right. I have  
21 the Document 118, Second Amended Complaint.

22 BY MS. LAROSS:

23 Q Okay. And so, Ms. Grant, can you see on  
24 your screen there the Second Amended Complaint in this  
25 case?

1           A     Yes. I see the Plaintiffs. I'm trying to  
2 scroll up. Wait a minute. Here we go.

3           Q     Yeah. I think your attorney is going to  
4 have to scroll for you.

5           A     Uh-huh.

6           Q     Okay, all right. And have you reviewed this  
7 document before?

8           A     I read this one. Yes.

9           Q     Okay. And if I could direct you and your  
10 counsel to paragraph 11. And that's on page 4. It  
11 starts at the bottom of page 4 and then goes to the  
12 top of page 5. And that paragraph begins with  
13 "Plaintiff Annie Louis Grant is a black citizen of the  
14 United States and the state of Georgia." Let me know  
15 when you can see what I'm talking about.

16          A     I do.

17          Q     Okay. Thank you.

18                Can you review that paragraph 11 and --

19          A     I have.

20          Q     Okay, great. And is the information  
21 contained in that paragraph about you -- is all of  
22 that correct and accurate?

23          A     It is. And if I can say so, it's exactly  
24 what I was saying, just in different words. My words  
25 were layman -- as a layman person.

1 Q Yes. And that's what we're asking for.

2 Okay, great.

3 And so you mentioned that you have voted in  
4 every election here in Georgia thus far. Do you plan  
5 to vote in future elections?

6 A I do.

7 MS. LAROSS: So if you could take that  
8 down, Makeba, thank you. I appreciate it.

9 MS. RUTAHINDURWA: It's down.

10 MS. LAROSS: Thank you.

11 BY MS. LAROSS:

12 Q And you mentioned that you voted in the 2022  
13 general election this past November; is that correct?

14 A Yes.

15 Q And did the candidate you voted for in  
16 Senate District 24 succeed?

17 A No.

18 Q How about the candidate you voted for in  
19 House District 124? Did that candidate succeed in the  
20 election?

21 A Are you talking about the representative?

22 Q I'm talking about State House District 124.

23 A No.

24 Q In 2021 there was -- go ahead. Sorry.

25 A I don't have my paperwork in front of me.

1 But here in Greene County, no, those candidates did  
2 not win.

3 Q Were the candidates that you voted for in  
4 Senate District 24 and House District 124, were they  
5 both Democrats?

6 A Yes.

7 Q During 2021 there was a special session of  
8 the General Assembly. And my question is, did you  
9 contact any of the legislators during that special  
10 session in 2021 concerning redistricting issues, the  
11 kind of issues you raised in your complaint?

12 A No.

13 Q Did you reach out to the legislators before  
14 the 2021 special session?

15 A No, not exactly. On our web page, we would  
16 post information and who people could call if they had  
17 concerns, but no.

18 Q How about after the 2021 special session of  
19 the General Assembly? Did you reach out to any  
20 legislator pertaining to redistricting issues?

21 A No.

22 Q Did you testify in the General Assembly on  
23 any redistricting issues?

24 A No.

25 Q Did you attend any hearings of the General

1 Assembly -- the Georgia General Assembly pertaining to  
2 redistricting?

3 A No.

4 Q And I think that you mentioned that at  
5 meetings of the Greene County Commissioners, there was  
6 a mention in meetings that you attended concerning  
7 redistricting. Do I have that correct?

8 A Yes.

9 Q Other than those meetings, have you attended  
10 any other meetings concerning redistricting?

11 A I wouldn't say it was a meeting concerning  
12 redistricting, but there was concerns -- not with me,  
13 but I'm seeking for me -- concerns of the City  
14 Attorney, who had written along that bill, 202. So  
15 that was very concerning to a lot of people. So that  
16 issue was brought up at the City Council because he is  
17 the attorney for the City. So a lot of people were  
18 concerned. I was there but not as a spokesperson.

19 Q And at those City Council meetings that you  
20 attended as a citizen and not a spokesman -- a  
21 spokesperson, did they discuss issues pertaining to  
22 redistricting, or was it only pertaining to SB202?

23 A When it was time for comments, as always,  
24 the mayor would allow people to speak. And a lot of  
25 the issues were about the redistricting and -- not

1 really the redistricting with the City but mainly  
2 about the 202 bill.

3 Q And did you speak at any of those meetings  
4 as a citizen?

5 A Yes. I spoke at one meeting, yes.

6 Q And what did you speak about?

7 A I posed a question to the manager, the  
8 councilperson, and to Mr. Fleming, if they could  
9 explain why he would be retained for the City and he  
10 had written 60-some-odd pages to that bill.

11 Q I'm sorry. I didn't quite follow the  
12 question that you raised at the meeting.

13 A I answered your question.

14 Q Okay.

15 MS. LAROSS: Marcia, could you go ahead  
16 and read back her answer?

17 THE REPORTER: Yes.

18 MS. LAROSS: I'm sorry. I think I  
19 missed something.

20 (The record was read.)

21 MS. LAROSS: Okay. Thank you.

22 Yeah, I missed part of that.

23 BY MS. LAROSS:

24 Q I want to ask you about your community. And  
25 have you ever heard the term "community of interest"?

1 A Yes.

2 Q And I'm not asking you as an attorney. I'm  
3 asking you as a layperson. What is your understanding  
4 of what "community of interest" means?

5 A For me, it's -- most of the time for me it's  
6 something or someone or some issue that is being  
7 placed or put forth and people are concerned about it  
8 and they show an interest in it, whether it's positive  
9 or negative or whether they're just trying to get some  
10 understanding. That's the way I feel, I mean, for  
11 "community of interest."

12 Q Okay. And if you were asked by someone  
13 outside of Georgia, how would you describe your  
14 community?

15 A My community is a concerned community,  
16 concerned about the children; concerned about their  
17 future, the children's future; concerned about our  
18 voting rights; concerned about our human rights;  
19 concerned even down to the local businesspeople here  
20 in this county as far as like -- lately it's been the  
21 price of gas, gouging.

22 So issues come up. And with most people in  
23 the community, it has to do with human rights. And I  
24 think the second thing would be -- the first thing  
25 would be interest in the children's future, our voting

1 rights, things that people have -- the older people,  
2 even older than I'm -- and I'm up in age -- talked  
3 about things that happened back when -- and trying to  
4 learn from those lessons.

5 So that's one of the things that I try to  
6 stay abreast of, are things that's going to further  
7 help people and not hinder them or knock them back or  
8 set them back and to think about the future for our  
9 children.

10 I'm a very strong advocate for children. I  
11 make sure that our children know that their  
12 participation and their willingness to learn things  
13 and know what is going on, it's for them. It's for  
14 their future, not for mine. I've lived mine. And now  
15 I just feel like I need to make sure I have my voice  
16 for those who are underprivileged or undereducated to  
17 the fact that things are going on.

18 We have our meetings, our mission meetings,  
19 and this is always brought up. People want to know  
20 why is this happening, what happened to certain  
21 things.

22 Just to make it simple, it was a task for me  
23 and others to explain to people -- a lot of voters who  
24 were sitting and waiting, thinking they was going to  
25 receive the absentee. And when I had to explain to



1     them how it had changed -- and we had a lot of people  
2     who didn't have a family member -- a lot of elder  
3     people that already voted, they didn't have a family  
4     member to take that back in. They didn't drive  
5     anymore.

6             There was a time where we could have sat  
7     down with their application, they could fill it out --  
8     if they couldn't write, we could write it for them,  
9     and they could sign it or put their X.

10            And after this 202 bill -- I feel like it  
11     had a lot to do with it -- we lost some voters because  
12     those of us who work and participate and help others,  
13     we had to explain to them that we could not do that  
14     anymore. They had to have a family member, very close  
15     family member, daughter, uncle, brother...

16            I went through it so many times on the phone  
17     to people that was calling. There was about ten of us  
18     that tried to stay breast of everything so we could  
19     explain it to them, that they were not going to  
20     receive a ballot in the mail or an application for a  
21     ballot. They would have to call in and request it.  
22     And then they had to have a close relative to take it  
23     back in.

24            So it was just a lot of things that were  
25     different. And when things become different -- when

1 people are set in certain ways and all of a sudden  
2 something changes, there are questions.

3 And I think everyone has a right to follow  
4 up on those and try to educate those that we know do  
5 not understand these rules and don't understand what  
6 happened and why it happened -- can't always answer  
7 the why -- just to let them know, this is what you  
8 have to do. I'm sorry, but this is what it is, and  
9 this is what you have to do.

10 So we -- I'm going to say it.  
11 African-Americans in the rural areas in close-knitted  
12 family ties to their church, to their mission  
13 organization, we have a lot of them that -- the  
14 redistricting really hurt a lot of them. They didn't  
15 understand what was going on, so...

16 Q Okay. And thank you for that.

17 When you talk about the community, that  
18 they're very concerned -- and you have indicated the  
19 various concerns that they present to you -- where is  
20 that community located? Is it city? County? State?

21 A All over Greene County. It's not just the  
22 city people. It's the county, all over the county.

23 Q Okay. Do you participate in any  
24 neighborhood or community associations?

25 A Pardon me?

1 Q Do you participate in any neighborhood or  
2 community associations?

3 A I am the Veterans Affairs chairperson for  
4 our local NAACP chapter. And my job is to stay  
5 abreast of information for veterans' policies and  
6 veterans.

7 And I also -- on Veterans Day the committee  
8 that I work with, we put flags -- we put crosses  
9 around the courthouse, beginning with the first war.  
10 And I collect names. I go out and I reach out by  
11 phone, by web page, by the county paper to find our  
12 veterans, even the young people with ROTC who had  
13 graduated and gone off into the service. I now have a  
14 tree in front of the courthouse with a cross with  
15 their names on it.

16 So I'm involved in my mission for my church  
17 and my youth group for my church and the usher board  
18 for my church.

19 Q You're a very busy person, if I may say.  
20 Boy oh, boy. And well done.

21 Okay. You mentioned that you also are a  
22 member of a church?

23 A Yes.

24 Q Okay. And what church is that, Ms. Grant?

25 A New Springfield Baptist Church on Highway

1 15, Siloam, S-I-L-O-A-M, Georgia 30665.

2 Q And how far is that church from your home?

3 A About 8 miles.

4 Q Okay. And I think you mentioned three  
5 things that you're involved in with the church. I  
6 want to make sure that I've got those correct. I  
7 think you said that you're involved with your church's  
8 mission, the youth group, and then there was a third  
9 thing. And I missed the third thing. Can you --

10 A The usher board.

11 Q And what do you do with that board?

12 A I usher on Sundays. I stand at the door,  
13 pass out information to people, helped them to find  
14 seats when we opened back up.

15 Q Okay, great. So I understand now. So you  
16 work as an usher at your church.

17 A Yes.

18 Q I thought you meant it as something else,  
19 some kind of other position in a group that I had  
20 never heard of. So that was my mistake, so I  
21 apologize.

22 A That's okay.

23 Q Okay. Thank you.

24 So you mentioned that you work with the  
25 mission with your church. And what do you do with

1 regard to that?

2 A Our mission work is an outreach work. We  
3 reach out into the community. We assist with food,  
4 with clothing.

5 And we also have a family in Nigeria, a  
6 family in -- I'm trying to think of the other country.  
7 Oh, oh, we have a family in the Bahamas that we  
8 participate in. We send care packages. We have  
9 stayed with a family through two of the -- both of the  
10 boys graduated from high school. And we gather other  
11 people together to help us to make sure that every  
12 year they have their school supplies, anything --  
13 during the COVID we made sure that we sent packages to  
14 them and their family. So a mission outreach is not  
15 just local; it's global.

16 Q Sure, sure.

17 Okay. And other than your church and all of  
18 what you've already described to us, are you involved  
19 with any other associations or organizations, civic or  
20 volunteer organizations, or anything else?

21 A I think I let -- you knew that I was in  
22 Veterans Affairs. Our chapter of NAACP, I'm the  
23 Veterans Affairs Chairperson. And with that job,  
24 yeah, I stay abreast and educate veterans. Maybe -- I  
25 have like four or five handicapped veterans. Any

1 information come through, I pass it on to them and  
2 their families, spouses. Myself with deceased  
3 veterans, whether it's from either war, that is still  
4 living, any rights that they have, anything that I can  
5 assist them with, I do that.

6 The chapter VA program, I stay abreast with  
7 that. And every Veteran Day -- on Memorial Day we  
8 place a wreath in front of the courthouse. And on  
9 Veterans -- two days -- well, a week before Veterans  
10 Day and all the way through the end of November, we  
11 have crosses around the courthouse, beginning with the  
12 first war and every name that we could find, I could  
13 collect, of county veterans, and their names are on  
14 the crosses.

15 Q I keep wanting to thank you for all the work  
16 you do.

17 A It's the only thing that keeps me going.

18 Q Okay. I'm supposed to be asking questions,  
19 actually. So I think we've covered all of your many,  
20 many activities.

21 I just want to ask you one thing. I think I  
22 hadn't asked this before. When you voted in November  
23 of 2022 in the general election, did you vote by early  
24 voting? Absentee? Or how did you vote?

25 A Early voting.

1 Q And that was in person in early voting?

2 A Yes, yes.

3 Q Okay. And how about for the runoff? Did  
4 you vote early? Or how did you vote?

5 A Early.

6 Q Okay.

7 (Off the record, following which a  
8 recess was taken.)

9 BY MS. LAROSS:

10 Q I'm just going to ask you some things just  
11 about voting in Georgia generally.

12 Let's see. So have you ever personally  
13 yourself been prevented from registering to vote based  
14 on your race?

15 A I had a problem when I was trying to get an  
16 absentee ballot when I was at Camp Lejeune. I'm not  
17 going to say it was because of my race. I guess maybe  
18 I felt that it was. But I finally got it done. But I  
19 did have a problem.

20 Q And you said you don't think that problem  
21 was related to your race; is that correct?

22 A No. I said I didn't want to say that. But  
23 I felt that way. But I'm not going to just say  
24 that -- put my hand on a stack of Bibles and say that  
25 it was. But I did feel that way.

1 Q And what made you feel that way? What was  
2 it about that had you feel that way?

3 A Because the person at the registrar asked me  
4 questions that should not have been asked. I had  
5 voted too many times for her to ask me those  
6 questions.

7 Q And were you speaking -- sorry. Who were  
8 you speaking with?

9 A The person at the Board of Registrars there  
10 in Jacksonville, North Carolina, at that time.

11 Q And were you trying to vote in Georgia at  
12 that time?

13 A I wanted an absentee application, yes.  
14 Because I didn't know how long I was going to be  
15 stationed there, I did not want to register there.  
16 And that's what they were trying to pressure me to do.

17 Q They wanted you to register in  
18 North Carolina?

19 A Yes.

20 Q Okay. And I think you said you did manage  
21 to be successful in getting your absentee ballot in  
22 Georgia; is that right?

23 A Yes, by the help of a person that was in  
24 Georgia that worked with that stuff.

25 Q Was the person that helped you, were they



1 with the County Board of Elections or in any official  
2 capacity?

3 A He was a principal -- at one of the  
4 schools -- that I knew.

5 Q Okay. So have you ever been prevented from  
6 participating in the political processes in your  
7 county based on your race?

8 A No.

9 Q Do you have any personal knowledge of  
10 discrimination by the government of Georgia against  
11 black people related to their participation in the  
12 democratic process?

13 A I do. I know of some situations. And I'm  
14 just going to name one that really I know for a fact  
15 that it was race because where the person thought they  
16 were supposed to vote, they were there. And as a poll  
17 watcher that particular year, I witnessed what  
18 happened.

19 And then I gave up my post. And I went  
20 outside with the person, took them to where they told  
21 them to go. And when they got there, they told them  
22 they couldn't vote there. And it wasn't pretty.

23 The person got very upset. And to be frank  
24 with you, I got upset also because I knew that that  
25 was a vote that we were going to lose because he

1 wasn't going to keep going from polling place to  
2 polling place when he knew where he was supposed to  
3 go. So I know that was discrimination.

4 Q Do you know if that person was ever able to  
5 vote in that election?

6 A He did not vote. He did not want to get --  
7 he was very upset.

8 And it wasn't only him. It wasn't just him.  
9 It was others. So at that particular time -- and that  
10 would have been during the -- well, that was during a  
11 presidential election.

12 Q Sorry. Tell me again. What election was  
13 that?

14 A It was a presidential election.

15 Q Was that in 2020?

16 A No.

17 Q What year was the presidential election that  
18 the incident that you described occurred in?

19 A That was during the first election for  
20 President Obama.

21 Q And you said there's other instances. Can  
22 you tell me about those?

23 A Some of the same things because after that  
24 there was so many problems. And I can't recall every  
25 one in detail. But there was so many problems that a

1 lot of people just gave up and just decided they were  
2 not going to vote.

3 And those issues were brought up at the  
4 Board of Elections, and I know quite a few of them did  
5 contact the State. And at that time they decided then  
6 also to try to close down some polling places. So it  
7 was evident that it was discrimination. They did  
8 close them.

9 Q And what you described just now, was that  
10 during the first presidential election for  
11 President Obama?

12 A That and the second one. It was very  
13 evident.

14 Q Any other instances that you have personal  
15 knowledge about of that kind of thing happening during  
16 an election?

17 A There was one problem where there was four  
18 people in the household. And I'll never understand  
19 why two, three would be in one district and the other  
20 ones in another one was told they couldn't vote where  
21 they went.

22 So it was just a lot of that happening. A  
23 lot of it was happening then. And that has a lot to  
24 do with the way I feel about the discrimination  
25 against black voters because it was happening. And

1 there was issues just popping up everywhere.

2 And even, you know, people in the community,  
3 talking about it, grocery stores. Everywhere you  
4 went, it was people talking about it. You know, I  
5 wasn't able to vote. They told me to go here, go  
6 there. It was just a lot of problems. And it was  
7 evident.

8 Q Do you have any personal knowledge of  
9 discrimination by the government of Georgia against  
10 black citizens in any other election other than the  
11 two elections for President Obama?

12 A Well, I mean, after the redistricting was  
13 wrong twice, I mean, there was nothing else you could  
14 do. I mean, there were just people who didn't  
15 understand where they were supposed to go. They had  
16 closed some of the polling places.

17 So it just -- really, this year -- no, I  
18 would say it's '20 when we finally felt like, you  
19 know, we had enough people to understand what had  
20 happened and why they were -- polling places they were  
21 accustomed to going to in the other cities were  
22 closed.

23 The mail was very screwed up. I mean, that  
24 was another problem. And it was in black  
25 neighborhoods. I'm going to be honest with you. It

1 was in black neighborhoods. People were not receiving  
2 their mail not just because of -- not just mail from a  
3 application or absentee ballot. We were just not  
4 receiving our mail.

5 So that was a big issue. And we knew what  
6 it was. I mean, I'm sure that was with everybody, not  
7 just a black issue. But it was happening a lot. And  
8 that was when we had the problem with people not  
9 receiving their ballots. They would get them too  
10 late.

11 The Board of Registrars, I had a pretty good  
12 working relationship with the superintendent. And  
13 somehow -- I don't know if I was given the right  
14 information from him. But one thing was I had -- we  
15 were just telling people to take them to Greensboro,  
16 to the post office, take them in themselves but take  
17 them back out there themselves, not to put them in the  
18 mail.

19 We lost a lot of people voting. But we were  
20 able to -- when I say "we," I'm talking about -- when  
21 you said the community, I'm talking about different  
22 people getting together and deciding we've got to do  
23 something. We cannot lose these votes. No matter who  
24 they're voting for, we just cannot lose the votes.

25 So we were eagerly getting on the phone from

1 my voters list, calling people, letting them know that  
2 they need to, if they could, take the ballot back in,  
3 not to mail it.

4 So it was just a lot of big issues, so -- a  
5 lot of issues.

6 Q I think you mentioned being a poll watcher.  
7 When you served as a poll watcher, was that on behalf  
8 of the Democratic Party?

9 A Yes. But a poll watcher --

10 Q Which election --

11 A I'm sorry. I'm sure you know what a poll  
12 watcher is. A poll watcher goes through training.  
13 But me and all poll watchers, once they're trained --  
14 even though we come out of different parties, we're  
15 not out there -- we don't know who these people are.  
16 We don't know if they're coming in to vote Republican  
17 or Democrat. We're just watching to see if any  
18 irregularity is going on or anyone has any problems.  
19 So that's what a poll watcher is.

20 Q Okay. In which election did you serve as a  
21 poll watcher, if you know? I mean, it may have been  
22 too many to recall or --

23 A I think that was back in the -- that was  
24 back in the year when Bernie Sanders and -- I don't  
25 know how many it was. So many of them was running.

1 It had to have been back in -- I'm guessing it would  
2 have been in '16. '18, '16. That was during -- most  
3 of it was during the Obama years, the two terms, when  
4 Clinton was running -- I'm speaking now of the  
5 Democrat candidates.

6 Q Okay. Do you know what the term "racially  
7 polarized voting" is?

8 A I have an idea, but it's not something I  
9 studied a lot about. For me, I don't -- it's kind of  
10 hard to put it into words. But when I look at  
11 "polarize" and what it means, what it actually means,  
12 and how it affects a person for any meaning, not just  
13 voting, for anything to do with -- maybe being seated  
14 on a certain organization or being able to get your  
15 voice across, for me, it's when you're put into  
16 different sections or different categories or -- and  
17 it not only affects your voting process or your voting  
18 rights, but it could affect just your everyday  
19 lifestyle.

20 Q In your opinion, do black voters in Georgia  
21 generally vote for Democratic candidates?

22 A In my opinion, I guess I can say yes, but it  
23 may be an understatement.

24 Q Is that opinion based upon your experience?  
25 I mean, is it based upon your experience -- do you

1 think that black voters in Georgia generally vote for  
2 Democratic candidates?

3 A Generally, yes, yes, but not always.

4 Q Do you know if Georgia uses a majority vote  
5 requirement in its election?

6 A If it uses what?

7 Q A majority vote requirement.

8 A To elect the winner of an election?

9 Q Yeah. If a candidate in an election needs  
10 to get at least -- has to get over 50 percent of the  
11 vote?

12 A Right, yes.

13 Q Okay. And it's a requirement that led to a  
14 runoff in 2021. And in the runoff in 2021,  
15 Senator Warnock and Senator Ossoff were both elected  
16 to the Senate. Are you aware of that?

17 A Yes.

18 Q And did you support both of those  
19 candidates?

20 A Yes.

21 Q And did you support Senator Warnock in the  
22 most recent runoff?

23 A Yes.

24 Q Have you ever heard the term "candidate  
25 slating" as it concerns elections?



1           A     Yeah, I've heard it. I don't know how to  
2 actually define it.

3           Q     Okay, that's fine. I'll move on.

4                     Has a lack of education kept you from  
5 participating in Georgia politics?

6           A     Lack of education? What type of education?

7           Q     Just any education. And we can refer --  
8 Ms. Grant, we can refer to formal education.

9           A     You mean people not being educated or have a  
10 minimum amount of education, or are we talking  
11 college? Are we talking no education or -- I don't  
12 know how to answer that.

13          Q     Sure, yeah. What I'm asking is that in your  
14 opinion have you ever been prevented from  
15 participating in Georgia politics because of a lack of  
16 education?

17          A     No one ever told me that. No.

18          Q     Okay. Has any lack of employment  
19 opportunities prevented you from participating in  
20 Georgia politics?

21          A     Employment?

22          Q     Yes, ma'am.

23          A     No.

24          Q     And has a lack of access to adequate health  
25 services prevented you from participating in the

1 political process here in Georgia?

2 A That's a far-reach question. I really don't  
3 understand the meaning behind that. Healthwise, I  
4 don't...

5 Q And you may not have experienced a lack of  
6 adequate health services. Would I understand that to  
7 be true?

8 A As far as health services, it is hard for  
9 people in the rural areas to get adequate health care  
10 without traveling a distance. But I don't see where  
11 that has anything to do with politics.

12 Q Okay. But you've never experienced that to  
13 be a problem in connection with politics?

14 A I had a problem when my husband was in the  
15 hospital. I mean, it was hard for me to try to get  
16 back here to vote because he had just had a surgery.  
17 But I don't know if that has anything to do with what  
18 you're talking about. It was hard, but I did it.

19 Q But he had health services available to him?  
20 It was just a matter of the services -- or his surgery  
21 that made it harder for you to get back to vote? Do I  
22 understand that correctly?

23 A For me and to get him an absentee.

24 Q Were you able to get him an absentee ballot?

25 A He had to wind up doing a provisional.

1 Q Say it again. He had to do what?

2 A Do a provisional.

3 Q Okay. He voted by provisional ballot? Is  
4 that what you mean?

5 A That year, yes.

6 Q Are you aware of the term "racial appeals"  
7 when used in the context of elections?

8 A Racial appeal?

9 Q Uh-huh.

10 A Repeal or appeal?

11 Q Appeals. It's when candidates of a  
12 particular race are portrayed in an election in a  
13 negative light.

14 A Yeah. It's used all the time in ads.

15 Q But -- go ahead. Sorry.

16 A I mean, that's evident for anyone who  
17 watches TV or reads the paper.

18 Q Give me some examples of what you're talking  
19 about.

20 A Well, each candidate always has something  
21 negative to say about the other one. Then you'll have  
22 an ad that's positive and an ad that's negative.  
23 That's just out there. Anybody sees that, so it's not  
24 just me.

25 Q Have you seen campaigns in Georgia where

1 black candidates were portrayed in a negative light?

2 A Yes.

3 Q And tell me about those instances.

4 A What do you want me to do? Choose one?

5 Q Sure. Give us an example.

6 A Well, in this last election, every time you  
7 turned your TV on, it was something negative about the  
8 candidates on both sides, the Republican and Democrat.  
9 So I don't have anything else to add to that.

10 Q Okay. Thank you.

11 Do you know how many black people have run  
12 for office in Georgia?

13 A Not just off the top of my head, no.

14 Q Sure.

15 And you're aware that several black  
16 individuals have been elected to office in Georgia  
17 over time, correct?

18 A Yes.

19 Q Did you know that the former Chief Justice  
20 of the Georgia Supreme Court, Harold Melton, was  
21 black -- is black and that he was elected to that  
22 position statewide? Are you aware of that?

23 A Yes.

24 Q And you're aware that in 2021 and then again  
25 in this past runoff that Senator Warnock was elected

1 statewide to the United States Senate, correct?

2 A Yes.

3 Q These are questions I have to ask.

4 MS. LAROSS: Okay. Let me just look  
5 over my list, and we may be through. I want  
6 to be mindful of your time here.

7 Ms. Grant, those are all the questions  
8 that I have. I so appreciate your time and  
9 your patience with technology and with my  
10 inability to run technology and all of that.

11 THE WITNESS: I feel the same way. The  
12 same sentiment goes to you.

13 MS. RUTAHINDURWA: I don't have any  
14 questions.

15 (Off the record.)

16 THE REPORTER: Did you want a copy,  
17 Ms. Makeba?

18 MS. RUTAHINDURWA: Yes, please.

19 THE REPORTER: Okay.

20 And then, just to confirm, Ms. LaRoss,  
21 you'll be getting the original and a copy?

22 MS. LAROSS: Okay, yeah.

23 (Deposition concluded at 6:42 p.m.)  
24  
25

## REPORTER DISCLOSURES

The following representations and disclosures are made in compliance with Georgia Law, more specifically:

Article 10(B) of the Rules and Regulations of the Board of Court Reporting (disclosure forms), OCGA 9-11-28(c) (disqualification of reporter for financial interest), OCGA 15-14-37(a) and (b) (prohibitions against contracts except on a case-by-case basis).

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1 - Password-Protected Access: Transcripts and exhibits  
relating to this proceeding will be uploaded to a  
2 password-protected repository, to which all ordering  
parties will have access.

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## C E R T I F I C A T E

I hereby certify that the foregoing transcript was reported, as stated in the caption; that the witness was duly sworn and elected to reserve signature in this matter; that the colloquies, questions and answers were reduced to typewriting under my direction; and that the foregoing pages represent a true, correct, and complete record of the evidence given.

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of Veritext Legal Solutions, and the signature and original seal is attached thereto.

Pursuant to Article 10B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure: That I am a Georgia Certified Court Reporter, here as an independent contractor for Veritext Legal Solutions; that I was contacted by the offices of Veritext Legal Solutions to provide court reporting services for this deposition; that I will not be taking this deposition under any contract prohibited by Georgia law; and that I am not disqualified as a reporter for a relationship of interest under the provisions of O.C.G.A. 9-11-28(c).

This the 27th day of December, 2022.



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MARCIA ARBERMAN, CCR-B-1059



1  
2  
3 To: MAKEBA RUTAHINDURWA, ESQ.

4 Re: Signature of Deponent ANNIE LOIS GRANT

5 Date Errata due back at our offices: 30 Days

6  
7 Greetings:

8 This deposition has been requested for read and sign  
9 by the deponent. It is the deponent's responsibility  
10 to review the transcript, noting any changes or  
11 corrections on the attached PDF Errata. The deponent  
12 may fill out the Errata electronically or print and  
13 fill out manually.

14 Once the Errata is signed by the deponent and  
15 notarized, please mail it to the offices of Veritext  
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22 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 in  
8 form or substance which you desire to make to your  
9 testimony shall be entered upon the deposition with a  
10 statement of the reasons given for making them. To  
11 assist you in making any such corrections, please use  
12 the form below. If additional pages are necessary,  
13 please furnish same and attach.

14 Page \_\_\_\_ Line \_\_\_\_ Change\_\_\_\_

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\_\_\_\_\_  
DEPONENT'S SIGNATURE

Sworn to and subscribed before me this \_\_\_\_ day of

\_\_\_\_\_, \_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:\_\_\_\_\_

[00122 - ads]

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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.

VERITEXT LEGAL SOLUTIONS  
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.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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

ANNIE LOIS GRANT, *et al.*,

Plaintiffs,

v.

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

Defendants.

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

**DEFENDANTS' NOTICE TO TAKE THE DEPOSITION  
OF ANNIE LOIS GRANT**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, counsel for Defendants Brad Raffensperger, in his official capacity as Secretary of State of Georgia; William S. Duffey Jr., in his official capacity as chair of the State Election Board; and Matthew Mashburn, Sara Tindall Ghazal, Edward Lindsey, and Janice Johnston will take the oral examination of Plaintiff Annie Lois Grant on Wednesday, December 14, 2022, beginning at 4:00 p.m. and continuing thereafter until completed via Zoom videoconferencing through Veritext Legal Solutions.

**EXHIBIT**

1

Details regarding the videoconferencing will be emailed to those participating once all arrangements are finalized.

The deposition shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (*e.g.*, videotape, LiveNote, etc.). The deposition will be taken for the purposes of cross-examination, discovery, and for all other purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

This 7th day of December, 2022.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2022, I caused a copy of the foregoing to be served by electronic mail on all counsel of record.

/s/ Bryan P. Tyson

Bryan P. Tyson

*Counsel for Defendants*