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

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

## VOLUME I

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The deposition of JACQUELINE ARBUTHNOT taken pursuant to the stipulations contained herein; all formalities waived, excluding the reading and signing of the deposition; before Heather D. Williams, CCR; taken on January 24th, 2023, via Zoom teleconference, commencing at 3:00 p.m.

## APPEARANCES

ON BEHALF OF THE PLAINTIFF:

MICHAEL C. JONES, ESQUIRE

MICHAEL C. JONES & ASSOCIATES, LLC

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ON BEHALF OF THE DEFENDANTS:

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## EXHIBITS

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	To Take Deposition of Jacqueline Faye Arbuthnot	
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	(Exhibit Not Attached)	
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## P R O C E E D I N G S

3:00 p.m.

(Whereupon, the court reporter complied with the requirements of O.C.G.A. §9-11-28(d).)

(Whereupon, all parties have agreed to waive 9-11-30 (b)(4), therefore, the swearing of the witness is remote and taken down via Zoom.)

(Witness sworn.)

Whereupon,

JACQUELINE ARBUTHNOT,  
was called as a witness herein, and having been first duly sworn, was examined and deposed as follows:

## CROSS-EXAMINATION

BY MR. WEIGEL:

MR. WEIGEL: This will be the deposition of Ms. Jacqueline Faye Arbuthnot, taken by Defendants for the purpose of discovery and all purposes allowed under the Federal Rules of Civil Procedure.

And since the witness has already been sworn in, I, Dan Weigel, am appearing for the Defendants from the law firm Taylor, English, Duma, and will let counsel for Ms. Arbuthnot make his appearance.

MR. JONES: Mike Jones from Elias Law Group, representing the Pendergrass and Grant Plaintiffs, defending Ms. Arbuthnot here, this afternoon.

1 MR. WEIGEL: And Counsel, is it agreeable that all  
2 objections will be reserved until hearing of this matter or  
3 first use of this deposition, with the exception to the  
4 form of the question and the responsiveness of the answer?

5 MR. JONES: Yes, it is.

6 BY MR. WEIGEL (Resuming)

7 Q Ms. Arbuthnot, I'm going to ask you a series of  
8 questions. The purpose of this deposition is not to confuse  
9 you. So if I ask you a question that you don't understand, or I  
10 phrase the question poorly, can we all agree that you'll let me  
11 know and I'll do my best to rephrase it?

12 A Yes.

13 Q And since this is a virtual deposition, our court  
14 reporter mentioned before we went on the record, there will  
15 likely be some audio issues that we encounter. And for the  
16 court reporter, its going to be important we do a couple of  
17 things.

18 First, do your best to speak clearly and loudly so that the  
19 court reporter can hear you.

20 Second, especially for "yes" or "no" answers where it may  
21 be easy to nod or give a verbal "uh-huh," be sure to say "yes"  
22 or "no" audibly.

23 And finally, we have to both do our best to not speak over  
24 each other or cut each other off. So even if you know the  
25 answer before I finish the question, make sure you wait until I

1 complete my question before you provide the answer, and  
2 likewise, I will do my best to make sure that I wait until you  
3 finish your entire answer before I start asking my question.

4 Similarly, if I ask a question and your attorney has an  
5 objection to my question, try to do your best to let your  
6 attorney make the objection for the record before you jump into  
7 any answer that you are going to provide.

8 Ms. Arbuthnot, is that agreeable?

9 A That is agreeable. Yes.

10 Q Also, if you need a break at any time, please just let  
11 me know. The only thing I'm going to ask is that if I've  
12 already asked the question, that you go ahead and answer the  
13 question that's been posed before we head off for a break.

14 And finally, with this being a virtual deposition, it's  
15 important that we confirm that you don't have any electronic  
16 devices out in the open during this deposition -- [connectivity  
17 interruption.]

18 THE COURT REPORTER: Mr. Weigel. I'm sorry. I'm  
19 having some issues with connectivity. Please just give me  
20 a moment to see if I can get this under control.

21 (A brief recess was taken at 3:12 p.m.)

22 BY MR. WEIGEL (Resuming)

23 Q So Ms. Arbuthnot, this is going to include your cell  
24 phone, which we have already discussed that you please that it's  
25 off.

1 Again, with this being a virtual deposition, you will  
2 certainly have to have the Zoom open and in front of you, and  
3 you'll also need to look at the screen for any exhibits that we  
4 may have. But if you can go ahead and confirm and agree that  
5 you will not have your cell phone on, or email, or text  
6 messaging, or any social media, or anything of that nature open  
7 during this deposition, that would be great.

8 A I agree.

9 Q Great. Well let's get going. Now, I am going to  
10 start by sharing my screen, which will be marked as Defendant's  
11 Exhibit 1.

12 Ms. Arbuthnot, can you see my screen?

13 (Exhibit 1 was displayed for review.)

14 A I can.

15 Q All right. And do you see the title of this document  
16 that says Defendants' Amended Notice To Take The Deposition Of  
17 Jacqueline Faye Arbuthnot?

18 A Yes.

19 Q All right. Now I will quickly scroll through this,  
20 and if you could just follow along with me while I do this.  
21 This is simply a copy of the notice of deposition that was  
22 issued to you.

23 Ms. Arbuthnot, are you familiar with this document as the  
24 version you received in connection with the deposition that  
25 we're all at today?

1 A Yes.

2 Q Perfect. Now, I will stop sharing my screen and we  
3 should be back in the normal view.

4 Ms. Arbuthnot, have you ever given any testimony prior to  
5 this, whether a deposition or in a trial?

6 A Yes.

7 Q And how many times have you done that to the best of  
8 your recollection?

9 A Once. Just one time.

10 Q One time. And do you recall when that was?

11 A That was in 1989, in Louisiana, for the incident that  
12 happened with my grandmother.

13 Q And do you recall if that case went to trial?

14 A It didn't go to trial. No.

15 Q So the testimony that you provided was in the form of  
16 a deposition similar to what we're doing today?

17 A Yes.

18 Q And I believe you mentioned it had to do with an  
19 incident with your grandmother. Do you recall any other facts  
20 or circumstances of the nature of the case?

21 A There was a slip-and-fall. She fell in their care.  
22 And so -- yeah.

23 Q And do you recall the disposition of the case or what  
24 the result was?

25 A The result was not in our favor.



1 Q Now Ms. Arbuthnot, have you taken any medications that  
2 would keep you from fully and truthfully participating in  
3 today's deposition?

4 A No.

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

8 A No.

9 Q Shifting gears a little bit. We kind of covered this  
10 in a related form with my prior question, but have you ever  
11 filed any election-related lawsuits in the past?

12 A No.

13 Q And have any direct family members of yours filed  
14 election-related lawsuits in the past?

15 A Not to my knowing.

16 Q Okay. Have you ever been charged with a crime?

17 A No.

18 Q Have you ever been arrested?

19 A No.

20 Q And I assume, based on those answers that you have  
21 also never been convicted. Is that true that you've never been  
22 convicted?

23 A Never. No. Never been convicted.

24 Q Have you discussed this case with anyone other than  
25 your lawyer?

1 A No.

2 Q And have you discussed this deposition with anyone  
3 other than your lawyer?

4 A No.

5 Q Did you review anything to prepare for this  
6 deposition?

7 A Yes.

8 Q And what did you review?

9 A The documents that you said I received from the  
10 attorney, only.

11 Q Without divulging any attorney-client privilege  
12 information, or the nature, or form of any communication you've  
13 had with your attorney, why did you look at those documents?

14 A To refresh my memory.

15 Q So looking at those documents helped to refresh your  
16 recollection as to the events that you will testify about today?

17 A Yes.

18 Q And do you have any documents or notes with you today?

19 A No.

20 Q Shifting gears again, Ms. Arbuthnot. Could you please  
21 state your full name for the record?

22 A Jacqueline Faye Arbuthnot.

23 Q And Ms. Arbuthnot, what is your current address?

24 A [REDACTED] Powder Springs, Georgia

25 [REDACTED]

1 Q Okay. What county is that in?

2 A Paulding.

3 Q And the city you said is Powder Springs; correct?

4 A Correct.

5 Q And how long have you lived at that address?

6 A About 18 years, plus.

7 Q And have you lived anywhere else in the past two  
8 years?

9 A No.

10 Q And you recall where you lived before moving to your  
11 current address?

12 A In Mississippi. You said the address? Pardon me.

13 Q No. And how long did you live in Mississippi for?

14 A 30-plus years.

15 Q And is the address you provided earlier the only  
16 address that you have lived in since moving from Mississippi to  
17 Georgia?

18 A There's been others.

19 Q Okay. And do you recall what those were?

20 A I can't quite remember the numbers, but it was Bakers  
21 Mill, here in Georgia -- Atlanta. Let's see. I lived in  
22 Fairburn, and College Park, as a matter of fact, when I first  
23 got here -- in Georgia.

24 Q And so how long have you lived in Paulding County?

25 A The 18 years at my home address.

1 Q And how long have you lived in Georgia?

2 A Let's see -- 23 years.

3 Q And I know you identified the other cities that you  
4 resided in, in Georgia. Do you recall any other counties that  
5 you have resided in, in Georgia?

6 A There was Clayton County, Cobb County, and I think  
7 that's it. Maybe Fulton. Yeah. That was all the counties.

8 Q And do you recall why you moved to Paulding County?

9 A Yes.

10 Q And why was that?

11 A It was closer to Kennesaw State where my daughter  
12 attended college.

13 Q And aside from Mississippi, which you identified  
14 earlier, have you ever resided in any other state besides  
15 Mississippi and Georgia?

16 A Yes.

17 Q And what were those?

18 A California.

19 Q So just those three?

20 A Yes.

21 Q And since this deposition is occurring virtually, can  
22 you provide the address that you are testifying from?

23 A [REDACTED] Atlanta, Georgia [REDACTED]

24 Q And is your lawyer presently with you in the room now?

25 A No.

1 Q And is anyone else present with you in the room, with  
2 you now?

3 A No.

4 Q And do you own -- either partially or full, any other  
5 properties currently?

6 A Yes.

7 Q And where are those located?

8 A In Woodville, Mississippi.

9 Q And are there any other ones, or just the one you  
10 identified in Woodville, Mississippi?

11 A That's it.

12 Q Do you rent anywhere else?

13 A No.

14 Q And have you owned any other rental properties in the  
15 last two years, other than those that you've already identified?

16 A No.

17 Q And now we'll shift gears a little bit and talk about  
18 your education. What was the highest level of education that  
19 you have completed?

20 A Master's degree.

21 Q Do you recall when you completed that Master's degree?

22 A In 1997.

23 Q Do you recall where you received that Master's degree  
24 from?

25 A Alcorn State University.

1 Q I think I could guess, but I'll just confirm with you,  
2 but what state is Alcorn State University in?

3 A Mississippi.

4 Q Mississippi. And aside from other than -- strike  
5 that. What did you receive your Master's in?

6 A Counseling education.

7 Q And have you ever attended any graduate school other  
8 than that associated with that Master's degree?

9 A No.

10 Q Moving back in time, did you receive a degree from any  
11 other college or University for an undergraduate degree?

12 A Yes.

13 Q Okay. And what was that in?

14 A Bachelor of Science.

15 Q And where did you receive that from?

16 A Southern University in Louisiana -- Baton Rouge,  
17 Louisiana.

18 Q And do you recall what year you received that degree?

19 A 1987.

20 Q Have you attended any college or university other than  
21 Southern University?

22 A Yes.

23 Q And what was that?

24 A Jackson State University. That's in Jackson,  
25 Mississippi.

1 Q Did you receive a degree from there or transfer from  
2 there to Southern University?

3 A I transferred.

4 Q And are there any other colleges or universities that  
5 you've attended for undergraduate courses?

6 A No.

7 Q And where did you attend high school?

8 A In Woodville, Mississippi.

9 Q And do you currently have any licenses?

10 A No.

11 Q In the past had any licenses?

12 A Yes.

13 Q And what would that be in?

14 A Cosmetology.

15 Q Any other licenses?

16 A No.

17 Q How about certifications?

18 A No.

19 Q Have you received vocational training in any other  
20 area?

21 A Yes.

22 Q What would that be in?

23 A Mortgage loan.

24 Q And when did you receive that vocational training?

25 A A month ago.

1 Q And where did you receive that vocational training?

2 A Here in Atlanta. Ameritrain Institute.

3 (Internet connection was lost at approximately 3:18 p.m. and was  
4 unable to be restored.)

5 (Volume I of deposition concluded at approximately 3:18 p.m.)

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

STATE OF GEORGIA )

COUNTY OF CARROLL )

I hereby certify that the foregoing deposition was taken down by me, as stated in the caption; and the questions and answers were reduced to print by me; that the foregoing pages represent a true, correct, and complete transcript of the evidence given on January 24th, 2023, by the witness, JACQUELINE ARBUTHNOT, who was first duly sworn by me; that I am not a relative, employee, attorney or counsel of any of the parties; am not a relative or employee of attorney or counsel for any of said parties; nor am I financially interested in the outcome of the action.

This the 24th day of January 2023.



Heather D. Williams, CCR

Certified Court reporter

License No. 6199-8887-6001-2800

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1 MICHAEL C. JONES, ESQUIRE

mikejones@mcjoneslaw.com

2  
3 February 2, 2023

4 RE: Grant vs Raffensperger

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5  
6 The above-referenced transcript is available for  
7 review.

8 (The witness/You) should read the testimony to  
9 verify its accuracy. If there are any changes,  
10 (the witness/you) should note those with the reason  
11 on the attached Errata Sheet.

12 (The witness/You) should, please, date and sign the  
13 Errata Sheet and email to the deposing attorney as well as  
14 to Veritext at Transcripts-ga@veritext.com and copies will  
15 be emailed to all ordering parties.

16 It is suggested that the completed errata be returned 30  
17 days from receipt of testimony, as considered reasonable  
18 under Federal rules\*, however, there is no Florida statute  
19 to this regard.

20 If the witness fails to do so, the transcript may be used  
21 as if signed.

22 Yours,

23 Veritext Legal Solutions

24  
25 \*Federal Civil Procedure Rule 30(e)/Florida Civil Procedure  
Rule 1.310(e).

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REASON\_\_\_\_\_

Under penalties of perjury, I declare that I have  
read the foregoing document and that the facts  
stated in it are true.

\_\_\_\_\_

(WITNESS NAME)

DATE

[&amp; - brad]

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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.

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

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

ANNIE LOIS GRANT, et al., )  
)  
Plaintiffs, )  
)  
vs. ) Civil Action No.  
) 1:22-CV-00122-SCJ  
BRAD RAFFENSPERGER, in his )  
official capacity as the George )  
Secretary of State, )  
)  
Defendant. )

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DEPOSITION OF: JACQUELINE ARBUTHNOT  
VOLUME II

---

S T I P U L A T I O N

IT IS STIPULATED AND AGREED by and between the  
parties through their respective counsel that the  
deposition of JACQUELINE ARBUTHNOT may be taken on  
January 24, 2023, before Anne E. Miller, Commissioner  
and Notary Public, remotely.

1           IT IS FURTHER STIPULATED AND AGREED that it  
2     shall not be necessary for any objections to be made by  
3     counsel to any questions except as to form or leading  
4     questions, and that counsel for the parties may make  
5     objections and assign grounds at the time of trial or  
6     at the time said deposition is offered in evidence or  
7     prior thereto.

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23

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## A P P E A R A N C E S

Appearing For The Plaintiff:

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Appearing For The Defendant:

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Court Reporter: Anne E. Miller

## I N D E X

Examination by Mr. Weigel ..... 4

Examination by Mr. Jones ..... 12

Examination by Mr. Weigel ..... 13

1 I, Anne E. Miller, a Court Reporter of the State of  
2 Alabama, acting as Commissioner, certify that on this  
3 date there came before me remotely on January 24, 2023,  
4 beginning at or about 3:40 p.m., JACQUELINE ARBUTHNOT,  
5 witness in the above cause, for oral examination,  
6 whereupon the following proceedings were had:

7  
8 JACQUELINE ARBUTHNOT,  
9 having been first duly sworn, was examined and  
10 testified as follows:

11  
12 MR. WEIGEL: We'll go back on the record  
13 now.

14 Q. Ms. Arbuthnot, we were talking about community.  
15 And based on those audio issues, I'm not sure I quite  
16 heard. Ms. Arbuthnot, how would you describe your  
17 community?

18 A. My community, safe and quiet.

19 Q. And where would you say that you are from? If  
20 someone asked you where you are from, where would you  
21 say? What would you say? Pardon me.

22 A. I'm from Mississippi.

23 Q. And what is that based on?



1 A. The years that I have spent there.

2 Q. And do you or have you participated in any  
3 neighborhood or community associations in connection  
4 with where you currently live?

5 A. No.

6 Q. And are you a member of any faith-based  
7 organization?

8 A. Yes.

9 Q. And what is that?

10 A. Siloam Church International.

11 Q. And do you attend services in connection with  
12 that?

13 A. Yes.

14 Q. And where are those services held?

15 A. They are in South Fulton. West College Park,  
16 South Fulton.

17 Q. And how long has it been in South Fulton as  
18 opposed to College Park?

19 A. Well, it's been there, but they changed the  
20 name.

21 Q. Okay. Understood. And about how far away is  
22 that from where you currently reside? How far a drive  
23 would you say that is?

1 A. About a 35 minute.

2 Q. And do you regularly attend services there?

3 A. Yes.

4 Q. And do you regularly attend services at any  
5 other place of worship?

6 A. No.

7 Q. And do you participate in any groups or  
8 activities in your place of worship?

9 A. Yes.

10 Q. And what are those groups or activities?

11 A. Greeter. And we have a women's ministry. Since  
12 the pandemic, we did have a prison ministry. I did  
13 participate in that.

14 Q. And I believe you mentioned the win (sic)  
15 ministry? What does that do?

16 A. It's women.

17 Q. Oh, women, sorry. What all do you do with that?

18 A. We volunteer, go into the nursing homes. We do  
19 coat drives, toy drives, Christmas. We do holiday  
20 specials. We give out food, things of that nature.

21 Q. And how often would you say you are involved in  
22 activities associated with the women's ministry?

23 A. Weekly.

1 Q. And are you involved in any school associations  
2 or activities?

3 A. No.

4 Q. Shifting back a little bit to the activities you  
5 are involved with with the women's ministry with your  
6 church, where are those activities held that you were  
7 describing? Is it in the Atlanta area or all over  
8 Georgia? How would you describe where those activities  
9 are?

10 A. In the Atlanta area, the Atlanta area. And in  
11 the area of South Fulton, East Point and those areas.

12 Q. And aside from that involvement with your  
13 church, are you involved in any civic organizations?

14 A. No, no. NAACP.

15 Q. Aside from what we have discussed previously,  
16 yeah.

17 A. No, no.

18 Q. And then with the NAACP, how often are you  
19 involved in activities associated with that group?

20 A. Occasionally, if there is a meeting nearby, I  
21 occasionally attend.

22 Q. So would you say once a month, twice a year?  
23 What would be an estimate --

1 A. Once a month. But since the pandemic, it hasn't  
2 been.

3 Q. Outside of all activities that we have discussed  
4 with your church and with the NAACP, where do you spend  
5 most of your time?

6 A. With my grandchildren.

7 Q. Do they live nearby?

8 A. Yes.

9 Q. Now again, I'm almost finished up here, Ms.  
10 Arbuthnot. I'm going to get at some quick questions  
11 that are going to be more tailored to the claims and  
12 allegations in the complaint. It could be simple "yes"  
13 or "no" questions, and depending on your answers, we  
14 may expand a little bit. But I will jump right into  
15 it. Have you ever been prohibited from registering to  
16 vote based on your race?

17 A. No.

18 Q. Have you ever been prohibited from participating  
19 in the political process based on your race, the  
20 participation in the democratic process?

21 A. No.

22 Q. Do you know what the phrase "racially polarized  
23 voting" is?

1 A. No.

2 Q. And in your opinion, do African-American voters  
3 in Georgia generally vote for Democratic candidates?

4 MR. JONES: Objection. Calls for  
5 speculation. Ms. Arbuthnot, you may answer.

6 THE WITNESS: You say I may answer?

7 MR. JONES: Yes, ma'am, you may.

8 A. Would you repeat the question?

9 Q. (BY MR. WEIGEL) Yes. With the understanding of  
10 your counsel's objection, in your opinion do black  
11 voters in Georgia generally vote for Democratic  
12 candidates?

13 MR. JONES: Same objection. You may  
14 answer.

15 A. Generally.

16 Q. (BY MR. WEIGEL) Okay. Do you personally know  
17 any black voters who have told you that they have voted  
18 for Republican candidates?

19 A. No.

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

22 A. No.

23 Q. Do you know why we had our most recent special

1 runoff election?

2 A. Yes.

3 Q. And why was that?

4 A. The votes were -- because of the votes, the  
5 number of votes and what that entails. So it required  
6 a runoff.

7 Q. And the most recent runoff election resulted in  
8 the election of Senator Raphael Warnock, right?

9 A. Right.

10 Q. And that was the candidate you supported and  
11 voted for, correct?

12 A. Yes.

13 Q. And are you familiar with the term "candidate  
14 slating process" as it is used in elections?

15 A. I don't recall.

16 Q. So based on that, you wouldn't have an  
17 understanding or knowledge of whether a candidate  
18 slating process is used in Georgia? Would that be  
19 accurate?

20 A. Based on my knowledge, yes.

21 Q. And has a lack of education kept you from  
22 participating in Georgia politics?

23 A. No.

1 Q. Has a lack of employment opportunities kept you  
2 from participating in Georgia politics?

3 A. No.

4 Q. Has a lack of access to adequate health services  
5 kept you from participating in Georgia politics?

6 A. No.

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

9 A. I have heard it, but I can't recall.

10 Q. And do you recall the context at all that you  
11 heard it in or anything related to the time and place  
12 that you heard it?

13 A. On the internet or the news.

14 Q. And are there any needs of the minority  
15 community in Georgia that in your opinion differ from  
16 those of the white residents?

17 A. Yes.

18 Q. And are there any in your opinion that differ  
19 from those of the white residents in Georgia?

20 A. It's a disparity, I think, in education and  
21 housing.

22 Q. Anything else?

23 A. African-Americans. That's all I can recall at

1 this time.

2 Q. And what do you base that on? Personal  
3 experience, reading news sources? What is that based  
4 on?

5 A. Based on reading resources, interacting with  
6 friends, members in the community.

7 MR. WEIGEL: All right. I believe that  
8 that covers all of my questions. Mr. Jones, did you  
9 have any questions for your client?

10 MR. JONES: Just very briefly.

11 MR. WEIGEL: And did you want to take a  
12 break at all or just get right into it? I'm good  
13 without it.

14 MR. JONES: Yeah. Let's keep going.

15

16 EXAMINATION BY MR. JONES:

17 Q. Ms. Arbuthnot, did I hear you correctly say  
18 earlier that you tend to support Democrats rather than  
19 Republicans?

20 A. Yes.

21 Q. And why is that?

22 A. Well, I -- there seems to be more assistance,  
23 more help, more resources that we have been able to



1 obtain as opposed to the other party.

2 Q. And when you say we, who are you referring to?

3 A. African-Americans. I'm sorry.

4 MR. JONES: Great. Thank you very much for  
5 that, and I have no further questions.

6 MR. WEIGEL: I just have a quick follow-up.

7

8 EXAMINATION BY MR. WEIGEL:

9 Q. Ms. Arbuthnot, when you say we and you are  
10 referring to African-Americans, are you referring to  
11 African-Americans who live geographically close to you  
12 or African-Americans across the state of Georgia?

13 A. Across the state, outside of the state.

14 MR. WEIGEL: Okay. That's all I needed.  
15 Do you have anything further, Mr. Jones?

16 MR. BARRATT: Nothing else.

17 MR. WEIGEL: Ms. Arbuthnot, thank you so  
18 much for taking the time to speak with me today about  
19 the case. I really do appreciate the time you have  
20 taken today. I believe we can now go off the record,  
21 and that completes the deposition.

22

23 (Deposition concluded at 4:05 p.m.)

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

STATE OF ALABAMA)

JEFFERSON COUNTY)

I hereby certify that the above and foregoing proceeding was taken down by me by stenographic means, and that the questions and answers therein were produced in transcript form by computer aid under my supervision, and that the foregoing represents, to the best of my ability, a true and correct transcript of the proceedings occurring on said date at said time.

I further certify that I am neither of counsel nor of kin to the parties to the action; nor am I in anywise interested in the result of said case.

Signed the 30th day of January, 2023.



/s/ Anne E. Miller

ACCR #486

Expires 9/30/23

My commission expires 11/19/23

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1 MICHAEL C. JONES, ESQUIRE

mikejones@mcjoneslaw.com

2  
3 February 2, 2023

4 RE: Grant vs Raffensperger

January 24, 2023 - Jacqueline Arbuthnot - Job No 5679635

5  
6 The above-referenced transcript is available for  
7 review.

8 (The witness/You) should read the testimony to  
9 verify its accuracy. If there are any changes,  
10 (the witness/you) should note those with the reason  
11 on the attached Errata Sheet.

12 (The witness/You) should, please, date and sign the  
13 Errata Sheet and email to the deposing attorney as well as  
14 to Veritext at Transcripts-ga@veritext.com and copies will  
15 be emailed to all ordering parties.

16 It is suggested that the completed errata be returned 30  
17 days from receipt of testimony, as considered reasonable  
18 under Federal rules\*, however, there is no Florida statute  
19 to this regard.

20 If the witness fails to do so, the transcript may be used  
21 as if signed.

22 Yours,

23 Veritext Legal Solutions

24  
25 \*Federal Civil Procedure Rule 30(e)/Florida Civil Procedure  
Rule 1.310(e).

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## E R R A T A S H E E T

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REASON\_\_\_\_\_

Under penalties of perjury, I declare that I have  
read the foregoing document and that the facts  
stated in it are true.

\_\_\_\_\_

(WITNESS NAME)

DATE

[&amp; - capacity]

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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.

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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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E R R A T A S H E E T

PAGE 10 LINE 9 CHANGE The document that you  
shared on your screen that I received from my attorney.

REASON Correct the way I stated the phrase

PAGE 11 LINE 20-21 CHANGE AKERS Mill Rd.

REASON to correct spelling of address

PAGE 10 LINE 4 CHANGE Because of the close number of

votes of each candidate what that entails, a run off was  
required

REASON Correct what I actually stated

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_

Under penalties of perjury, I declare that I have  
read the foregoing document and that the facts  
stated in it are true.

Jacqueline Arbuthnot  
(WITNESS NAME)

2/23/23  
DATE



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E R R A T A S H E E T

PAGE 5 LINE 15 CHANGE They are in South Fulton

that was College Park but now South Fulton

REASON to correct right words & spelling I spoke

PAGE 6 LINE 11 CHANGE Greeter and we have a

women ministry called WIN. Before pandemic, we had a Prison

REASON to correct the phrase I spoke about my Church.

PAGE 7 LINE 10 CHANGE In the Atlanta area and the

area of South Fulton, East Point and various other areas.

REASON to correct the way I stated the phrase.

PAGE 7 LINE 14 CHANGE NAACP

YES - NAACP

REASON to correct that I said yes - not NO.

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_

Under penalties of perjury, I declare that I have  
read the foregoing document and that the facts  
stated in it are true.

Jacqueline Arbuthnot

(WITNESS NAME)

2/23/23

DATE