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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

vs.

NO. 1:22-CV-00122-SCJ

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

Defendants.

DEPOSITION OF ELBERT SOLOMON  
TAKEN BY REMOTE VIDEOCONFERENCE

December 9, 2022  
2:10 p.m.

REPORTED REMOTELY BY:  
LAURA R. SINGLE, CCR-B-1343

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A P P E A R A N C E S  
(All appearing remotely)

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For the Defendants:

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\*\*Exhibits not received by counsel\*\*

## P R O C E E D I N G S

(Pursuant to Article 10(B) of the Rules and Regulations of the Georgia Board of Court Reporting, a written disclosure statement was submitted by the court reporter to all counsel present at the proceeding.)

\* \* \*

(The witness was sworn.)

MS. LAROSS: This will be the deposition of Elbert Solomon, taken by notice and agreement of counsel. The deposition is taken by the Defendants the Secretary of State Raffensperger and members of the Georgia State Election Board.

It is taken for the purpose of discovery and all other purposes allowable by the Federal Rules of Civil Procedure.

All objections except those going to the form of the question and responsiveness of the answer will be reserved until the trial or first use of the deposition, if that's agreeable to you, Counsel.

MS. RUTAHINDURWA: Agreed.

MS. LAROSS: Thank you.

And how would you and your client wish to handle reviewing and signing the deposition?

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1 MS. RUTAHINDURWA: We'll review and sign.

2 MS. LAROSS: Okay. Thank you.

3 ELBERT SOLOMON,

4 Having been first duly sworn to state the truth, was  
5 examined and testified as follows:

6 EXAMINATION

7 BY MS. LAROSS:

8 Q. Mr. Solomon, good afternoon. My name is  
9 Diane LaRoss, as I mentioned earlier; and I along  
10 with Dan Weigel -- you'll see he's also joining us  
11 for the deposition. He's an attorney here at my  
12 office, and he represents the State defendants as  
13 well.

14 So I'm just going to go over with you a few  
15 kind of ground rules for proceeding today, and then  
16 we'll get into the questioning after that.

17 So, Mr. Solomon, can you hear me okay?

18 A. Yes.

19 Q. Okay. Great. Perfect. And if you cannot,  
20 please let me know because I know being on Zoom it  
21 makes it a little bit more difficult than if perhaps  
22 we were in person. So we'll need you to speak  
23 clearly and loudly, and the purposes of that is so  
24 that the court reporter can take down a clear and  
25 accurate transcript of everything that's said today

1 during your deposition.

2 So is that agreeable to you?

3 A. That's agreeable.

4 Q. Great.

5 Just one small point about that. Your  
6 answers will need to be verbal, which you've just  
7 done; but, you know -- so a nod of the head or shake  
8 of the head can't quite be transcribed as well as a  
9 verbal response. So I'll need you to respond  
10 verbally as appropriate to my questions.

11 Is that agreeable to you?

12 A. That's agreeable, yes.

13 Q. Okay. Perfect. Sorry. Let me just do  
14 this. My sound went out for a moment. Can you still  
15 hear me, Mr. Solomon?

16 A. Yes.

17 Q. Okay. I can hear you now.

18 A. Yes, yes, yes.

19 Can you hear me?

20 Q. Okay. I can. I apologize. We're going to  
21 need to go off the record just for a second. I'm  
22 going to have to put my audio through my phone  
23 because there's something that's unstable on my  
24 computer and I'm not sure what that is. So if we  
25 could just take a moment. Sorry about that. My

1 apologies.

2 (A recess was taken.)

3 BY MS. LAROSS:

4 Q. Just to go on, we had begun with some  
5 instructions and just general guidelines for the  
6 deposition. I would also ask that you and I not  
7 speak at the same time. So I would ask if you would  
8 wait until my question is completed before beginning  
9 your answer. Again, that is going to enable the  
10 court reporter to get a clear transcript from today's  
11 proceeding.

12 So is that agreeable to you?

13 A. Yes.

14 Q. Okay. Also, if at any time you need to take  
15 a break, that, of course, is entirely fine. I would  
16 just ask that if we complete whatever question is  
17 before you at that point and then we can certainly  
18 take a break if you let us know that.

19 Is that also agreeable?

20 A. Yes.

21 Q. Thank you.

22 Lastly, we just ask that you not have any  
23 electronic devices available during your deposition.  
24 Obviously, you've got to keep Zoom on; but if you  
25 could turn your phone off and not have your e-mail

1 or text messaging or social media?

2 A. (Indicating.)

3 Q. Great. I can see you turned your phone off.  
4 Thank you very much. I appreciate that. Sometimes  
5 there can be -- you know, a lot of it affects the  
6 sound and it also can be distracting. So I very much  
7 appreciate that. Thank you, Mr. Solomon.

8 I just wanted to ask you where are you  
9 located today in giving your deposition from?

10 A. I'm giving my deposition from Griffin,  
11 Georgia.

12 Q. And is that your office where you work?

13 A. Yes.

14 Q. Okay. Is there anyone else in the room with  
15 you today?

16 A. No. In the office but not in the room that  
17 I'm in.

18 Q. Okay. I know and there might be a party  
19 going on out there, so --

20 A. Right.

21 Q. -- if things get loud, you can let us know  
22 that as well.

23 I know that you're represented by counsel in  
24 this deposition, and she's also appearing by Zoom; is  
25 that correct?



1 A. Correct.

2 Q. I'm going to share my screen with you and  
3 hope that I can do this successfully. I just want to  
4 show you what I'm going to mark as Exhibit 1. Let's  
5 see. I'm about to share it.

6 (A discussion was held off the  
7 record with the court reporter.)

8 MS. LAROSS: The only exhibit I was going to  
9 use, Counsel, is just the notice of deposition  
10 and the most current version of the complaint.  
11 That's really it we'll be using for today, and I  
12 wonder if maybe we could agree -- and I'll send  
13 you a copy and if you agree with the notice of  
14 deposition that I'll send to you and if you would  
15 agree that it would be okay to mark that as  
16 Exhibit 1 to the deposition.

17 MS. RUTAHINDURWA: Absolutely. That's okay.

18 MS. LAROSS: Okay. Thank you.

19 MS. RUTAHINDURWA: I think everyone else can  
20 see the document except for you.

21 Just for the record, I pulled up the notice  
22 of deposition of Elbert Solomon, taken Friday,  
23 December 9th at 2:00 p.m. and dated December 7th,  
24 2022; and I'll stop sharing my screen now.

25 MS. LAROSS: Okay. Perfect. That sounds

1 exactly like the copy that I have as well. So  
2 that will end up being marked as Exhibit  
3 Number 1.

4 BY MS. LAROSS:

5 Q. Mr. Solomon, have you ever given a  
6 deposition before?

7 A. No.

8 Q. Have you ever testified at trial?

9 A. No.

10 Q. Have you taken any medications today that  
11 would keep you from fully and truthfully  
12 participating in today's deposition?

13 A. No.

14 Q. And just to ask quickly, do you have any  
15 medical condition that might keep you from fully and  
16 truthfully participating in the deposition today?

17 A. No.

18 Q. Have you filed any other lawsuits in any  
19 election-related cases other than the one we're here  
20 about today?

21 A. No.

22 Q. How about any -- do you have any family  
23 members that have filed lawsuits in any  
24 election-related cases?

25 A. No.

1 Q. Have you filed any prior claims, you or your  
2 family members, on any election-related matters?

3 A. No.

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

5 A. No.

6 Q. So I would understand that you've never been  
7 arrested. Would that be correct?

8 A. No, no. Yes, yes, I have never been  
9 arrested.

10 Q. I apologize. The way I asked the question  
11 was confusing, so thank you for clarifying.

12 Have you discussed this case with anyone  
13 other than your attorney?

14 A. No; except for my personal counsel, my  
15 personal -- I'm talking about Makeba and my personal  
16 attorney.

17 Q. Okay. Other than -- is your personal  
18 attorney also representing you in this litigation in  
19 addition to your counsel here today or are they just  
20 your personal lawyer?

21 A. It's my personal lawyer that I seek legal  
22 counsel from time to time, but they're not  
23 representing me here today.

24 Q. Okay. Other than that person and your  
25 counsel that's with you today, have you discussed the

1 case -- this case with anyone else?

2 A. No.

3 Q. Other than your attorney who's with you  
4 today and the counsel that you mentioned, have you  
5 discussed your deposition with anyone else?

6 A. No.

7 Q. Did you review anything in preparation for  
8 your deposition today?

9 A. Just the information that was provided to me  
10 by my attorney.

11 Q. Was that just -- was that the notice of  
12 deposition saying what day and time your deposition  
13 would be?

14 A. That is correct, yes.

15 Q. That's what we were discussing earlier, and  
16 that's going to be marked as Exhibit 1 to your  
17 deposition.

18 A. Yes.

19 Q. Any other -- have you reviewed anything else  
20 in preparation for your deposition today other than  
21 the notice that we've discussed?

22 A. Rephrase the question, please.

23 Q. Sure.

24 I'm just -- my questions are -- I just want  
25 to find out if there's anything that you reviewed to

1 prepare for your deposition today. I know that you  
2 mentioned that you looked at the notice of  
3 deposition, and I was wondering if there was anything  
4 else that you reviewed in preparation for today's  
5 deposition?

6 A. No.

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

9 A. Only the documents that have been provided  
10 by my attorney.

11 Q. Okay. Thank you.

12 If you would, Mr. Solomon, could you go  
13 ahead and state your full name for the record?

14 A. Elbert D. Solomon.

15 Q. What is your current address, sir?

16 A. [REDACTED] Griffin, Georgia, [REDACTED]

17 Q. And is that in Spalding County?

18 A. Yes.

19 Q. How long have you lived at that [REDACTED]  
20 address?

21 A. Six years.

22 Q. Sorry. Can you say that again? I missed  
23 it.

24 A. Six years. Six years.

25 Q. Okay. Great. Thank you.

1 I heard it that time I believe you said six  
2 years.

3 A. That's correct.

4 Q. Am I correct?

5 A. That's correct.

6 Q. Okay. Thank you.

7 How long have you lived in Spalding County?

8 A. Six years.

9 Q. Okay. Are you from Georgia?

10 A. No.

11 Q. Where are you originally from?

12 A. Prentiss, Mississippi. Prentiss,  
13 P-R-E-N-T-I-S-S, Mississippi.

14 Q. Okay. And how long did you live in  
15 Mississippi?

16 A. 30 years.

17 Q. And when you left Mississippi, where did you  
18 move to?

19 A. Sumter County. Sumter County.

20 Q. So that would be Sumter County here in  
21 Georgia?

22 A. Sumter County, Georgia. Americus, Georgia,  
23 is the city.

24 Q. And from when to when did you live in  
25 Americus, Georgia?

1 A. December 29, 2015.

2 Q. Is that when you left Americus, Georgia?

3 A. Correct.

4 Q. Okay. Great.

5 And how long had you lived in Americus,  
6 Georgia, at the time you moved from there?

7 A. 35 years.

8 Q. And then you mentioned December 29, 2015.  
9 Is that when you moved to Spalding County?

10 A. Correct.

11 Q. When you lived in Sumter County,  
12 Mr. Solomon, did you live at the same address there  
13 or did you live at several addresses?

14 A. The same address. Well, two addresses. I  
15 lived in an apartment for a couple of years and then  
16 I purchased a home, so two addresses.

17 Q. What's the address of the home that you  
18 purchased --

19 A. [REDACTED]

20 Q. -- in Sumter County?

21 A. [REDACTED] Americus, Georgia, [REDACTED] --

22 Q. That's okay. No worries if you can't  
23 remember the ZIP code. This isn't a test of your ZIP  
24 codes or, in fact, a test of anything. I don't know  
25 that I would remember my previous ZIP code.

1 A. [REDACTED]

2 Q. Well done.

3 And do you still own the home at [REDACTED]  
4 [REDACTED] in Americus?

5 A. No.

6 Q. Did you sell that property when you moved to  
7 Spalding County?

8 A. Yes.

9 Q. What occasioned you to move to Spalding  
10 County?

11 A. I retired.

12 Q. What had you choose Spalding County?

13 A. I moved to a 55-plus community, retirement  
14 community.

15 Q. That's the [REDACTED] address, correct?

16 A. Correct.

17 Q. Do you own a home there or what is --

18 A. I own my home.

19 Q. Okay. I gotcha. Thank you, sir.

20 Other than your home on [REDACTED], do you  
21 own any other property?

22 A. Yes.

23 Q. And what are those, sir?

24 A. I own a lot at [REDACTED], Americus,  
25 Georgia.



1 Q. You mentioned that's a lot. So there's not  
2 a home on that lot. Would that be correct?

3 A. Correct.

4 Q. Any other property, sir, that you own?

5 A. I own the property, but it's heirs'  
6 property. My parents left us property. We have not  
7 had it divided.

8 Q. Okay. Where is that property located?

9 A. In Prentiss, Mississippi.

10 Q. You mentioned that your parents left you  
11 that property. Did they leave that property to you  
12 and siblings or just you alone?

13 A. Yes, siblings.

14 Q. It was left to you and your siblings?

15 A. Correct.

16 Q. Okay. I think you mentioned that that  
17 property hasn't been divided amongst you?

18 A. That's correct.

19 Q. You-all own it jointly?

20 A. Correct.

21 Q. Okay. Do you own any other property that  
22 you haven't mentioned to us?

23 A. No.

24 Q. I'm going to ask you about your education  
25 just kind of briefly just to get a sense for where

1 you attended for your education. If you could let us  
2 know, how far did you get in school?

3 A. I completed college; a BS degree, a master's  
4 degree, and a BS degree in chemical engineering.

5 Q. And where did you complete college?

6 A. University of Southern Mississippi. I got a  
7 bachelor's and a master's in chemistry and math and a  
8 BS in chemical engineering from Mississippi State  
9 University.

10 Q. And when did you receive your BA from the  
11 University of Southern Mississippi in chemistry and  
12 math?

13 A. In May 1972.

14 Q. And at that time did you receive your degree  
15 in both chemistry and math?

16 A. Yes.

17 Q. And then how about your -- I think you  
18 mentioned you also got a master's from the University  
19 of Southern Mississippi?

20 A. In 1975.

21 Q. Okay. 1975. And was your master's in both  
22 chemistry and math?

23 A. It was in science education.

24 Q. It sounds like you went on for your master's  
25 degree right out of college after you received your

1 BA; is that correct?

2 A. I took one year off.

3 Q. Okay. And what did you do during that year?

4 A. I taught school in the public schools in  
5 Mississippi.

6 Q. Okay. What grades did you teach?

7 A. High school.

8 Q. And then I believe you mentioned that you  
9 also received a master's degree in chemical  
10 engineering from Mississippi State?

11 A. No; a BS, a BS degree.

12 Q. Okay. Okay. Sorry about that.

13 So a BS degree in chemical engineering from  
14 Mississippi State. When did you get that degree,  
15 sir?

16 A. 1980, May 1980.

17 Q. While you were attending the University of  
18 Southern Mississippi, just generally were you  
19 involved in any student organizations, civic  
20 organizations, or other kinds of activities like  
21 that?

22 A. Yes.

23 Q. And what organizations did you belong to?

24 A. An African-American student organization.

25 Q. Any other organizations?

1 A. No.

2 Q. Any political organization while you were in  
3 college at --

4 A. No.

5 Q. Sorry. I'm going to ask the question again  
6 because I asked it badly.

7 Did you participate in any political  
8 organization while you were attending college at  
9 Mississippi State?

10 A. No.

11 Q. The University of Southern Mississippi?

12 A. No.

13 Q. Did you participate in any student  
14 organizations while you were at Mississippi State?

15 A. No.

16 Q. After receiving your bachelor's from  
17 Mississippi State, have you had any other education  
18 or training?

19 A. Not college-wise. On-the-job training.

20 Q. Okay. And what types of training?

21 A. Team building training, leadership training,  
22 management training, all those.

23 Q. Do you have any licensing or licenses,  
24 professional licenses I should say?

25 A. Not active at this time. I was an educator

1 and I had a teaching license when I was an educator  
2 for four years. They've expired.

3 Q. Okay. You're retired, so that makes  
4 complete sense then.

5 I'm going to ask you about your employment.  
6 So let's see. After leaving the University of  
7 Southern Mississippi, if you could tell us what your  
8 first employment was then.

9 A. I was a teacher.

10 Q. And was that when you taught high school  
11 that you mentioned earlier?

12 A. Yes.

13 Q. And was that for one year?

14 A. I taught for four years.

15 Q. What was your next employment after teaching  
16 four years in high school?

17 A. After I completed my engineering degree, I  
18 started working for Procter & Gamble.

19 Q. And what year did you begin working for  
20 Procter & Gamble?

21 A. June 1980.

22 Q. And what did you do for Procter & Gamble?

23 A. I was a project engineer and manager.

24 Q. How long did you work for Procter & Gamble?

25 A. 12 years, but I worked at the same location

1 for 17 years. They sold the plant, and I remained on  
2 with the Weyerhaeuser Company.

3 Q. What was the company that you remained with  
4 after Procter & Gamble sold the plant?

5 A. Weyerhaeuser. Weyerhaeuser.

6 Q. Oh, thank you.

7 And while you were at Procter & Gamble and  
8 then stayed on with Weyerhaeuser, were you always a  
9 project engineer?

10 A. No. I was an operations manager and a unit  
11 manager in that order.

12 Q. I think you mentioned that was 17 years with  
13 Procter & Gamble and Weyerhaeuser. Would that take  
14 us to 1997? Would that be when you completed your  
15 employment --

16 A. Correct.

17 Q. -- with Weyerhaeuser?

18 And where did you go to work after that?

19 A. I started working for myself. I started my  
20 business, which is an education products company that  
21 I still run today from my home.

22 Q. And what kind of educational products does  
23 your business sell?

24 A. My business developed curriculums for  
25 schools in the area of parental involvement and

1 character education.

2 Q. That business is still active now?

3 A. Yes.

4 Q. Other than your own business that you've  
5 described for us, did you have any other employment  
6 after 1997?

7 A. No.

8 Q. In your educational product business, was  
9 that business that you started while you were living  
10 in Mississippi?

11 A. No.

12 Q. Was that started while you were living in  
13 Sumter County, Georgia?

14 A. Yes.

15 Q. I want to get an idea of your business and  
16 your customers. Are your customers all in Georgia or  
17 where are your customers from just generally?

18 A. My customers are all over the country and  
19 outside of the country.

20 Q. Okay. So when you say outside of the  
21 country, what countries are you talking about?

22 A. Well, I sold some products in Africa. I  
23 sold some products in -- well, it's not a country.  
24 It's a territory, Puerto Rico.

25 Q. When you say that you sold products all over

1 the United States, what states would that include  
2 other than Georgia?

3 A. Oh, my goodness. Multiple. At least 25. I  
4 sold to schools and school districts all over the  
5 country; in California, New York, all over.

6 Q. Okay. And now you mentioned that that  
7 business is still ongoing. Where are your current  
8 clients and customers?

9 A. Alabama, Georgia, Louisiana, Arizona, New  
10 Mexico.

11 Q. What's the name of your business?

12 A. It's "I Care" Products & Services.

13 Q. Do you have any staff that work with you in  
14 that company?

15 A. Not since 2015 when I retired and moved  
16 away. I run it from my home. It's a computerized  
17 curriculum, digital curriculum now.

18 Q. I believe you mentioned that -- do you run  
19 that business from your home currently?

20 A. Yes.

21 Q. I know you mentioned that you retired; but  
22 just to get a sense, how many hours a week or a month  
23 are you working in that business?

24 A. Less than ten.

25 Q. Less than ten per week?



1 A. Per month.

2 Q. Per month, okay.

3 I'm going to ask you about your voting  
4 history and registration. Are you currently  
5 registered to vote in Georgia?

6 A. Yes.

7 Q. Where did you register to vote?

8 A. First in Sumter County and, of course, in  
9 2015 when I moved here to Spalding County.

10 Q. And you're currently registered to vote in  
11 Spalding County?

12 A. Yes.

13 Q. What congressional district did you reside  
14 in before the current redistricting?

15 A. 16. That's -- 134, I believe, before  
16 redistricting.

17 Q. And now you reside in Senate District 16?

18 A. No; 117.

19 Q. Okay.

20 A. That's congressional senate 16.

21 Q. Okay. Great.

22 So 117 is your congressional district. Does  
23 that sound right?

24 A. Correct. Correct.

25 Q. And before redistricting what was your

1 congressional district where you resided?

2 A. I think it was 130. No. I'm sorry. 134.

3 Q. Okay.

4 A. 134.

5 Q. That's okay. I know you're doing your best.

6 If you're uncertain, that's fine, too.

7 A. It was either 134 or 73, which has now  
8 become 74.

9 Q. Okay. Fair enough.

10 So have you voted in each election since  
11 you've been registered to vote in Georgia?

12 A. Yes.

13 Q. Have you voted in all presidential primaries  
14 in Georgia?

15 A. Yes.

16 Q. Since you've been in Georgia?

17 A. Yes.

18 Q. Have you voted in all general elections  
19 since you moved to Georgia?

20 A. Yes.

21 Q. And other than the presidential primary,  
22 have you voted in all other primaries in Georgia  
23 since you moved here?

24 A. Yes.

25 Q. Have you voted in all special elections in

1 Georgia since moving to the state?

2 A. Yes.

3 Q. Did you vote in the November -- in the  
4 November 2022 election?

5 A. Yes.

6 Q. Did you also vote in the runoff this past  
7 week?

8 A. Yes.

9 Q. Have you voted in any other state?

10 A. Other than Mississippi when I lived there,  
11 no other state.

12 Q. Okay.

13 A. Mississippi and Georgia.

14 Q. Okay. That was a poorly asked question.

15 When you resided in Mississippi, you voted  
16 there; is that correct?

17 A. Yes, that's correct.

18 Q. Okay. Do you consider yourself a member of  
19 the Democratic Party?

20 A. Yes.

21 Q. And how long have you been a member, sir?

22 A. Since I was 18 years old.

23 Q. While being a member of the Democratic  
24 Party, have you held any leadership positions within  
25 the party or associated with the party?

1 A. Local, yes.

2 Q. What local positions have you held in  
3 connection with the Democratic Party?

4 A. Second vice president or vice chair, so to  
5 speak.

6 Q. You cut out a tiny bit. Did you say that  
7 you were president of the --

8 A. No; second -- second vice chair.

9 Q. What is the name of the local organization  
10 that you were the vice chair for?

11 A. It's the Spalding County Democratic  
12 Committee.

13 Q. How long have you held that position or did  
14 you hold that position?

15 A. Two years.

16 Q. Do you currently hold that position?

17 A. Yes.

18 Q. Have you held any other positions with the  
19 Spalding County Democratic Committee?

20 A. No.

21 Q. Did you hold any positions in the Democratic  
22 Party or connected to the Democratic Party before  
23 moving to Spalding County?

24 A. No.

25 Q. What activities have you participated in in

1 connection with the Democratic Party?

2 A. Can you be more specific?

3 Q. Sure.

4 I'm wondering if you participated in any  
5 campaigns or served on committees or other types of  
6 activities? Have you been to meetings, conferences?  
7 I know it's a very general question.

8 A. Yes. I've gone to the state Democratic  
9 conference.

10 Q. And when did you attend the state Democratic  
11 conference?

12 A. October 2022.

13 Q. Did you attend the conference as a delegate  
14 or any other kind of position?

15 A. Alternate delegate.

16 Q. Other than the state Democratic conference  
17 in October of 2022, did you -- have you ever attended  
18 any other state conferences for the Democratic Party?

19 A. No.

20 Q. Other than what you just described thus far,  
21 any other activities that you participated in in  
22 connection with the Democratic Party?

23 A. No more than local events that we had.

24 Q. Those local events, would those include  
25 candidates coming or general party meetings or what

1 kind of events?

2 A. We have a monthly meeting.

3 Q. What is your role at the monthly meetings?

4 A. As an officer I served on the executive  
5 committee that actually facilitates the meeting.

6 Q. Have you worked on any political campaigns?

7 A. No.

8 Q. Is it fair to say that you generally support  
9 Democratic candidates for election in Georgia?

10 A. Not only in Georgia.

11 Q. So did you support Democratic candidates in  
12 Mississippi as well as Georgia?

13 A. Yes.

14 Q. Have you ever voted for a Republican?

15 A. Yes.

16 Q. And who are the Republicans that you voted  
17 for?

18 A. I voted many times because I had to choose  
19 between the lesser of two evils. There were no  
20 Democrats on the ballot.

21 Q. And was that in Mississippi or here in  
22 Georgia?

23 A. In Georgia and Mississippi.

24 Q. Did you say on those occasions that you  
25 voted for a Republican there was not a Democrat

1 listed on the ballot? Is that correct?

2 A. That is correct.

3 Q. Had there been a Democrat listed on the  
4 ballot, would that have been the person that you  
5 voted for, the Democrat?

6 MS. RUTAHINDURWA: Objection; speculation.

7 THE WITNESS: Not necessarily.

8 BY MS. LAROSS:

9 Q. Have you ever voted for a Republican when  
10 there was a Democrat on the ballot?

11 A. I'm not sure.

12 Q. So in 2022 in the election in November, did  
13 you vote for any Republican?

14 A. Yes.

15 Q. And who are the Republicans you voted for in  
16 November of 2022?

17 A. They were -- they were only choice I had, so  
18 I don't actually remember their names.

19 Q. Okay. Fair enough.

20 So for governor, for example, did you vote  
21 for Stacey Abrams?

22 A. Yes.

23 Q. And did you vote for a Republican for any of  
24 the statewide offices; lieutenant governor, secretary  
25 of state, any other statewide offices in Georgia in

1 November of 2022?

2 A. No; unless they were the only one. As I  
3 said, there were a couple on there that you didn't  
4 have a choice; and rather than leave it blank, I  
5 voted for them. They were the only one running in  
6 that area.

7 Q. You mentioned that you also voted in the  
8 most recent runoff that happened earlier this week.  
9 Did you vote for Raphael Warnock in that election?

10 A. Yes.

11 Q. Did you vote for Senator Warnock in the  
12 runoff election in 2021?

13 A. Yes.

14 Q. Did you vote for Senator Warnock in the  
15 general election in 2020 --

16 A. Yes.

17 Q. -- that would have led to the runoff?

18 Okay. Thank you.

19 Have you participated in any voter advocacy  
20 groups?

21 A. Yes.

22 Q. And what groups are those?

23 A. Black Voters Matter.

24 Q. And how long did you participate with Black  
25 Voters Matter?



1 A. Three years.

2 Q. And when was that? When was that  
3 participation?

4 A. 2019.

5 Q. So would that have been from 2019 to about  
6 2022?

7 A. Correct.

8 Q. So are you still participating with the  
9 Black Voters Matter?

10 A. Yes.

11 Q. And what have you done with Black Voters  
12 Matter?

13 A. Register people to vote.

14 Q. And for what elections did you register  
15 people to vote or you just registered people to vote  
16 ongoingly?

17 A. Yes. Ongoingly.

18 Q. Ongoingly, okay.

19 Where did you register people to vote from?  
20 Where did you engage in that activity?

21 A. At different events in the community.

22 Q. When you say different events in the  
23 community, what community are you referring to?

24 A. Spalding County community.

25 Q. Did you ever work to register folks to vote

1 outside of Spalding County?

2 A. Yes.

3 Q. And tell me about that activity.

4 A. Sumter County.

5 Q. When did you do that?

6 A. When I lived there.

7 Q. Have you been involved with any other voter  
8 advocacy groups?

9 A. No.

10 Q. I'm going to ask you about some questions  
11 about the current lawsuit. When did you first learn  
12 about the lawsuit that we're here about today?

13 A. A year and a half or two years. It's been  
14 awhile.

15 Q. Okay. And how did you hear about it?

16 A. I was called by a colleague in the  
17 Democratic Party.

18 Q. And what did they tell you about the  
19 lawsuit?

20 A. It came up in a discussion. It was about --

21 Q. And what were you-all --

22 A. We were discussing redistricting.

23 Q. Did that person discuss with you your  
24 becoming a plaintiff in the lawsuit or did you just  
25 speak with that person generally about the lawsuit?

1           A.    I spoke generally about the lawsuit, and  
2   then I started Googling more and more information  
3   about it, about this whole process of redistricting.

4           Q.    And when you say you were Googling, you were  
5   Googling about the possible redistricting or Googling  
6   about the lawsuit itself?

7           A.    No.  Actually, it started with discussions  
8   around how the census was going to be used.  That's  
9   how the original conversation started, and I was told  
10   it was going to be used for redistricting and  
11   different other things.

12          Q.    And then did you Google about the census in  
13   addition to redistricting in order to learn more  
14   about the process?

15          A.    I started researching information about my  
16   own districts and started paying attention and  
17   reading articles and different things about it and  
18   that kind of piqued my interest in it.

19          Q.    And when did you start doing that research?

20          A.    During the time the census was being taken.  
21   Was that about two years ago?  Two years ago, yeah.

22          Q.    How did it come about that you became a  
23   plaintiff in the lawsuit that we're here about today?

24          A.    The same colleague was telling me about the  
25   opportunity, and I volunteered.  I wanted to get

1 involved.

2 Q. That colleague, is that one of the other  
3 plaintiffs in the case?

4 A. Yes.

5 Q. And who is that?

6 A. Dexter Wimbish, attorney.

7 Q. And what made you decide to sue the  
8 Secretary of State and the State Board of Elections?

9 A. Well, as I researched -- the more and more I  
10 researched, that was the source of this  
11 redistricting; and I realized the impact that it was  
12 having on my community.

13 Q. Again, when you say the impact it was having  
14 on your community, what community are you referring  
15 to?

16 A. My district -- districts here in Spalding  
17 County.

18 Q. So it would be both your senate district and  
19 your congressional district?

20 A. That is correct.

21 Q. What do you hope the lawsuit accomplishes?

22 A. I hope that it provides a fairer opportunity  
23 for Democrats to be able to participate in the  
24 governmental processes.

25 Q. Okay. And when did you first talk to a

1 lawyer about getting involved in the lawsuit?

2 A. I guess it was about a year and a half ago.  
3 I can't remember dates.

4 Q. That's fine. Just an estimate is fine.

5 Who did you speak with? What lawyer did you  
6 speak with?

7 A. Again, there have been a change in lawyers  
8 over the course of this case, and I don't remember  
9 all the names. Sorry.

10 Q. That's okay.

11 Do you remember who you first spoke with?  
12 Did that name stay in your mind?

13 A. No. No. I can't remember.

14 Q. Okay. Do you remember any of the names of  
15 any of the lawyers that you spoke with?

16 A. I can go find them in my e-mails; but off my  
17 head, I can't remember.

18 Q. Okay. Fair enough.

19 And when you hired your attorneys in this  
20 lawsuit, did you sign any written agreements with  
21 them?

22 A. The fact that I would be a plaintiff, yes.  
23 I had to sign that.

24 Q. Have you --

25 A. No. I just said I had to sign to be a

1 plaintiff.

2 Q. And would that have been with the law firm  
3 that your counsel, who is with you here today, where  
4 she's from?

5 A. Yes.

6 Q. And what did you understand to be the terms  
7 of the agreement with the attorneys?

8 A. It's that I would be a plaintiff in the case  
9 and I would be questioned about how redistricting  
10 impacted me and my community.

11 Q. Did you pay your attorney?

12 A. No.

13 Q. Have you ever paid your attorneys in  
14 connection with this case?

15 A. No.

16 Q. Do you know if they've received payment for  
17 their work on this litigation?

18 A. I don't know, but I'm sure they do. They  
19 have to make a living, you know.

20 Q. Do you have any -- what's your understanding  
21 of how they'll be paid or do you know?

22 A. I don't know, but I know they're being  
23 funded by someone. I'm not sure who.

24 Q. And have you been paid in exchange for your  
25 participation as a plaintiff in this case?

1 A. No.

2 MS. LAROSS: Counsel, I was hoping perhaps  
3 you could post or share your screen with the  
4 second amended complaint in this case. I did  
5 want to ask Mr. Solomon a question or two about  
6 that.

7 MS. RUTAHINDURWA: Okay. I'm sharing my  
8 screen. The document is 118 filed October 28th,  
9 2022. It's entitled, Second Amended Complaint.

10 MS. LAROSS: Okay. Perfect. That is the  
11 document that I was referring to. If it's  
12 agreeable with you, I would like to mark that as  
13 Exhibit 2 to Mr. Solomon's deposition.

14 MS. RUTAHINDURWA: Yeah, agreed.

15 MS. LAROSS: Okay. Great. Thank you.

16 BY MS. LAROSS:

17 Q. Mr. Solomon, can you see the document that  
18 your attorney has shared her screen?

19 A. Yes.

20 Q. Okay. And if you wouldn't mind turning to  
21 paragraph 17, I wanted to ask you a question or two  
22 about that paragraph; and let me know when you get  
23 there.

24 MS. RUTAHINDURWA: We're on paragraph 17  
25 now.

1 MS. LAROSS: Thank you. I very much  
2 appreciate your help with this.

3 MS. RUTAHINDURWA: No problem.

4 BY MS. LAROSS:

5 Q. Mr. Solomon, so paragraph 17 begins with  
6 Plaintiff Elbert Solomon is a black citizen of the  
7 United States and the State of Georgia. Do you see  
8 where I'm referring -- what I'm referring to?

9 A. Yes.

10 Q. If you could just take a moment and read  
11 through the entirety of paragraph 17. I think it  
12 goes on to the next page. If you could tell me if  
13 all of the information contained in that paragraph is  
14 accurate.

15 MS. RUTAHINDURWA: And just let me know when  
16 to scroll down, Mr. Solomon.

17 THE WITNESS: You can scroll down.

18 That's the end of it, of 17. I finished  
19 reading it.

20 BY MS. LAROSS:

21 Q. Perfect. Thank you.

22 Is everything in that paragraph accurate  
23 still today?

24 A. It is accurate.

25 Q. I do think you mentioned that you voted in



1 the 2022 general election. Did the candidate you  
2 voted for in Senate District 15 succeed?

3 A. No.

4 MS. RUTAHINDURWA: Counsel, can I stop  
5 sharing the document?

6 MS. LAROSS: Oh, yes, of course. Thank you.  
7 I apologize. I should have mentioned that.

8 BY MS. LAROSS:

9 Q. And did you also vote for House District  
10 117?

11 A. Yes.

12 Q. And did that candidate succeed?

13 A. No.

14 Q. Did you reach out to any legislators during  
15 the 2021 special session concerning the redistricting  
16 issues raised in your complaint?

17 A. No.

18 Q. Did you reach out to any legislators before  
19 the special session in 2021 concerning the  
20 redistricting issues raised in your complaint?

21 A. No.

22 Q. How about after the session? Is your answer  
23 the same about contacting any legislators?

24 A. I did not contact any legislators.

25 Q. Did you testify in the Georgia General

1 Assembly on any of the issues pertaining to  
2 redistricting in 2021?

3 A. No.

4 Q. Did you attend any hearings on meetings of  
5 the Georgia legislature pertaining to redistricting?

6 A. I attended one online session, if I recall  
7 correct.

8 Q. And at that online session, Mr. Solomon, did  
9 you participate or speak during that hearing or  
10 meeting?

11 A. No.

12 Q. So you just attended to listen to the  
13 hearing?

14 A. Yes.

15 Q. You mentioned earlier that Mr. Wimbish was  
16 your colleague that you first spoke to concerning  
17 this litigation. Do I have that correct?

18 MS. RUTAHINDURWA: Objection.

19 THE WITNESS: I can't recall whether he was  
20 the first one or not. He provides me legal  
21 counsel when I need it. I can't recall to say he  
22 was the first one.

23 BY MS. LAROSS:

24 Q. Okay. All right. Do you also participate  
25 with Mr. Wimbish in the Spalding County Democratic

1 Committee?

2 A. Let me complete the question. He is a  
3 member of the Spalding County Democratic Committee.

4 Could I take a break for a couple of seconds  
5 here?

6 Q. Certainly. Why don't we say for five  
7 minutes. That's fine.

8 A. Okay. Thank you.

9 (A recess was taken.)

10 BY MS. LAROSS:

11 Q. Mr. Solomon, I do have a few more questions  
12 for you today; and I just want to remind you, even  
13 though we have taken a break, that you're still under  
14 oath today. Is that clear to you?

15 A. It's clear, yes.

16 Q. Do you have an understanding of the term  
17 "community of interest" or is that a term you've ever  
18 heard before?

19 A. I've heard the term. I just don't know  
20 what --

21 MS. RUTAHINDURWA: Hang on. Let me object  
22 first.

23 I'm going to object. It's a compound  
24 question and to the extent it calls for a legal  
25 conclusion.

1 If you know, you can respond.

2 BY MS. LAROSS:

3 Q. And, Mr. Solomon, I'm not asking you for a  
4 legal conclusion. I understand you're not an  
5 attorney. I'm just looking for what your  
6 understanding of the term "community of interest" is.

7 A. It's a general term that can be used for  
8 neighborhood of interest or community or group of  
9 interest. So I would have to have more information  
10 to understand what you want me to address in terms of  
11 community of interest. Can you provide me a little  
12 more clarification?

13 Q. Yes, sir. I would be happy to.

14 A. I know what it means generally, but I'm not  
15 sure in what reference you want me to speak about it.

16 Q. Okay. What would you consider to be your  
17 community of interest?

18 A. I would consider it to be the Spalding  
19 County area. If I took a look at the map in  
20 reference to this case of the districts that make up  
21 Spalding County, it's part of several of these  
22 districts. So I'm looking at larger than just  
23 Spalding County when I'm thinking of the term  
24 community interest. It includes Pike County. It  
25 includes Henry County. It includes Lamar County. It

1 includes Fayette County. And I'm looking at all of  
2 those counties as a community of interest.

3 Q. Okay. Sure.

4 And what is it about those areas that you  
5 described that make them part of your community of  
6 interest?

7 A. Because these are all districts that impact  
8 the people in this community. Because with the  
9 redistricting, you've had packing and you've had  
10 cracking in this area of interest.

11 Q. You said that those areas are included  
12 because they impact this community, and I'm wondering  
13 when you say this community what community are you  
14 referring to.

15 A. The Spalding County community. The  
16 boundaries are not just at the end of Spalding  
17 County. The way the districts -- they overlap into  
18 Spalding. So like the senate district, you know, it  
19 includes other counties as well. It's not just  
20 Spalding. 117 includes Henry County. It includes, I  
21 believe, a little of -- I know it includes Spalding  
22 County. It includes a little of maybe Fayette. I  
23 need to look at the map. It's not just Spalding  
24 County. It's -- there are other surrounding counties  
25 that the districts are connected. That's what I'm

1 looking at as the community of interest.

2 Q. Okay. So is it fair to say that it's the  
3 areas that are within 117?

4 MS. RUTAHINDURWA: Objection;  
5 mischaracterizes prior testimony. Objection;  
6 asked and answered.

7 THE WITNESS: No, not just 117. I'm looking  
8 at Spalding County. If you put Spalding in the  
9 middle and all those overlapping counties that  
10 voters in Spalding vote for as far as District  
11 74, District 134, District -- Senate District 16,  
12 District 117, you've got Spalding County voters  
13 voting in all those districts.

14 BY MS. LAROSS:

15 Q. Okay. You mentioned that there was packing  
16 in your district. Can you be more specific about  
17 what you mean by that?

18 A. It's where you put a certain minority group  
19 all together. That's packing. And cracking is when  
20 you disburse the minority groups in -- a few of them  
21 in one district and a few such that they can never be  
22 a majority.

23 Q. And so when you think of those terms, do you  
24 think in terms of minority groups?

25 A. Yes.

1 Q. And that would be racial minorities; is that  
2 correct?

3 A. Correct. Correct.

4 Q. And are you -- sorry. I didn't mean to  
5 interrupt you.

6 Would you be -- the racial minority, is that  
7 the black community or what racial minority are you  
8 speaking of?

9 A. The black community because we make up the  
10 majority.

11 Q. You make up the majority of where?

12 A. You were talking about minority. We are the  
13 majority minority.

14 Q. Would that be just in Spalding County or is  
15 that in the area that you described as including --  
16 go ahead.

17 A. In District 117, District 134, Senate 16,  
18 and District 74, I believe. It was 73. 74.

19 Q. Okay. And what is your understanding of --  
20 you've explained it to us. What is that based on?

21 MS. RUTAHINDURWA: Objection.

22 THE WITNESS: Can you be more specific?

23 BY MS. LAROSS:

24 Q. Sure. No problem. That was a bad question.

25 You spoke about that the black community is

1 the majority minority. What is that statement based  
2 on? What do you base that on?

3 A. I base it on actual data that I look at in  
4 the number of Republican voters and the number of  
5 Democratic voters that are in these districts.

6 Q. Is it your understanding then that the  
7 Democratic voters in the district are black voters?

8 A. Not necessarily.

9 Q. Okay. Let me go back and ask you a  
10 question. You said you looked at data of voters as a  
11 basis for your understanding that the black  
12 communities, the majority minority community in the  
13 district, and you said that you look at data and the  
14 number of Republicans and Democrats. Can you be more  
15 specific about how that data reflects the racial  
16 composition of the area?

17 A. What I was sharing with you is the fact that  
18 all the voters in those districts are not black. All  
19 of the Democratic voters are not black in those  
20 districts, but there's a very small number of white  
21 voters in those districts. There are some Democratic  
22 white voters in those districts, but the number of  
23 them is very small. But it's more black Democratic  
24 voters.

25 Q. Is it your understanding that black voters



1 typically vote for a Democratic candidate?

2 A. Statistically, yes.

3 Q. So we were speaking about your community,  
4 and I wanted to ask a few more questions about that.

5 Are you a member of any faith-based  
6 organizations?

7 A. Yes.

8 Q. And where is that located, that  
9 organization?

10 A. In Spalding County.

11 Q. Is that a church?

12 A. Yes.

13 Q. And do you regularly attend services at that  
14 church or at another place of worship?

15 A. At that church.

16 Q. And how far from your home is the church  
17 approximately?

18 A. 15 miles.

19 Q. And what activities or groups at your church  
20 do you participate in, if any?

21 A. We have what we call wards, and I  
22 participate with the ward activities.

23 Q. Describe for me the ward that you  
24 participate with.

25 A. It's just a group that work together on

1 projects. We'll divide it into four wards; north,  
2 south, east, and west, based on where you live.

3 Q. Okay. So the wards are separated  
4 geographically; is that correct?

5 A. Yes.

6 Q. And the ward that you participate in is the  
7 ward that you live in --

8 A. That is correct.

9 Q. -- near your church; is that correct?

10 A. That's correct.

11 Q. So is that anything more than you have  
12 smaller group meetings, you know, within your ward  
13 and other activities that just happen in your ward?  
14 Is that correct?

15 A. Yeah. We fellowship together and we'll work  
16 on projects together.

17 Q. And that's in addition to attending services  
18 at the church itself --

19 A. That is correct.

20 Q. -- is that right?

21 A. That is correct.

22 Q. Okay. Have you held any positions of  
23 leadership in your church?

24 A. No.

25 Q. And are you involved in any civic

1 organizations other than the ones you described?

2 A. No, not anymore. Let's put it that way.

3 After I retired, I just haven't got involved in any.

4 Q. Where do you socialize typically?

5 A. In my community, the community I live in, my  
6 retirement community.

7 Q. They have a lot of activities there for  
8 you-all?

9 A. Yes.

10 Q. Have you ever been prevented from  
11 registering to vote based on your race?

12 A. No.

13 Q. Have you ever been prevented from  
14 participating in the political process based on your  
15 race?

16 A. Yes.

17 Q. Tell me about that.

18 A. For example, this year I took some voter  
19 registration forms to the election office and was  
20 told I could not submit them unless I was a relative.

21 Q. And when did that happen? Did that happen  
22 during early voting or was that -- at what point did  
23 that happen?

24 A. In October timeframe. October.

25 Q. Did you mention that what you presented were

1 voter registration documents?

2 A. Yes, I did. They accepted them after I  
3 prevailed and explained the law.

4 Q. Okay. If you could walk me through what  
5 happened, that you went to -- was it Spalding County  
6 to present the voter registration forms? And tell me  
7 what happened after you presented the forms.

8 A. The clerk explained -- she asked me are  
9 these relatives. It was 15 forms. I said, no,  
10 they're not relatives. She said, well, if they're  
11 not relatives, I cannot accept them. And I asked  
12 when did that happen, when was there a law change in  
13 the election laws. And she said, well, you will have  
14 to speak to a supervisor. And so I said okay.

15 I spoke with the supervisor; and she said,  
16 well, you can't turn in any voter registration unless  
17 you are deputized. And I said, when did that happen;  
18 third parties can turn in voter registration forms; I  
19 have been turning them in for 40 years; when did that  
20 happen.

21 So she said, well, you have to be deputized.  
22 I told her I had been deputized years ago and I had  
23 also been trained and if she didn't take the forms  
24 that I would find another way. So they did take the  
25 forms later on. And I said, if it requires someone

1 being deputized you will have to do some deputy  
2 training and you have not done it over the past year  
3 since you've been the new election supervisor.

4 A couple of months -- well, a few weeks  
5 after that she did do deputy training; and at the end  
6 of the training, she stated that you did not have to  
7 be deputized in order to turn in voter registration  
8 forms. So she went back and read the law that third  
9 parties can turn in voter registration forms. So  
10 that was the end of that.

11 Q. And did that all take place at the same time  
12 or did you have to leave the office and come back and  
13 speak with her or how did all that work?

14 A. She accepted the forms. The forms were  
15 inputted, and the next thing I heard is she was doing  
16 deputy training and she did share at the end -- and  
17 this was secondhand information that she did share.  
18 And I continued to take forms down there, and they  
19 accepted them.

20 Q. You said that you had presented voter  
21 registration forms for over 40 years. Do I have that  
22 correct?

23 A. That is correct.

24 Q. And so that would include your time when you  
25 resided in Mississippi as well; is that correct?

1 A. No; when I was in Sumter County.

2 Q. Oh, okay. So you were -- you collected  
3 voter registration documents in Sumter County and  
4 Spalding; is that correct?

5 A. Yes. I registered people to vote, yes.

6 Q. Okay. And did you register people to vote  
7 when you were living in Mississippi?

8 A. No.

9 Q. Okay. So that is just something you've done  
10 since you've lived in Georgia?

11 A. That is correct.

12 Q. And that work registering people to vote,  
13 was that in connection with your participation with  
14 the Democratic Committee or what organization -- was  
15 it connected to any organization?

16 A. Not all the time.

17 Q. Have you collected voter registration in  
18 connection with your service on the Spalding County  
19 Democratic Committee?

20 A. Yes.

21 Q. Did you work with the Democratic Committee  
22 in Sumter County?

23 A. Not as a member but I did projects with them  
24 when they needed volunteers. I volunteered a lot,  
25 but I was not an officer.

1 Q. Okay. And was one of the activities that  
2 you were involved in with the Sumter County  
3 Democratic Committee -- would that have included  
4 collecting voter registration?

5 A. Yes.

6 Q. And while collecting voter registration for  
7 the Democratic Committee in Sumter County, did you  
8 personally present those registrations to the  
9 election office in Sumter County or did someone else  
10 do it?

11 A. Someone else did it.

12 Q. You mentioned that your work registering  
13 folks to vote in Georgia, not every time was in  
14 connection with an organization. Do I have that  
15 correct?

16 A. That is correct.

17 What happened is part of our civic duty --  
18 it may be at church or it may be at some organization  
19 function or whatever (audio interference).

20 THE COURT REPORTER: Hang on one second. I  
21 didn't understand that last part. You kind of  
22 broke up.

23 THE WITNESS: Voter registrations are done  
24 at all type of events. I was trained on how to  
25 do voter registration. So I would take voter

1 registration for that organization. You have to  
2 be trained on what to do, and it may be at  
3 church, it may be at a type of function that you  
4 have where you do voter registrations.

5 BY MS. LAROSS:

6 Q. Do I understand you correctly that you  
7 participated in voter registration events that may  
8 have been connected with various different  
9 organizations, whether it was churches or other  
10 organizations, but that you were there to participate  
11 in voter registration?

12 A. I was there because I was a trained person.  
13 I had been trained. They would ask who has been  
14 trained to do voter registration, and I would  
15 volunteer to do them.

16 Q. Who trained you in voter registration?

17 A. The election supervisor at wherever I was.

18 Q. So did the election supervisor in Sumter  
19 County -- did that person train you in voter  
20 registration?

21 A. Yes.

22 Q. And was there also the -- strike that. And  
23 also in -- let me start again.

24 Were you also trained in voter registration  
25 by the election supervisor of Spalding County?



1           A.    Not directly with the supervisor. It was  
2   the assistant person, but it was at the request  
3   through the supervisor. It wasn't -- it was her  
4   assistant that actually did the training, but there's  
5   a record of it. It should be there in Spalding  
6   County.

7           Q.    Okay. And I think when we started this  
8   particular discussion, I had asked you if you had  
9   ever been prevented from participating in the  
10   political process based on your race, and you  
11   described the circumstance where initially Spalding  
12   County would not accept the voter registrations that  
13   you presented in October of 2022. Do I have that  
14   correct?

15          A.    That is correct.

16          Q.    Other than that instance, any other instance  
17   when you have been prevented from participating in  
18   the political process based on your race?

19          A.    There have been -- no, no other instances.

20          Q.    Okay. And the instance that you described  
21   in October 2022 with regard to the voter registration  
22   documents and presenting them to Spalding County,  
23   what was it about your race that you felt was the  
24   basis for the events that happened?

25          A.    Voter suppression. Voter suppression.

1 Q. And what do you base your conclusion that it  
2 was voter suppression based on your race? What is  
3 that based on?

4 A. My role as the second vice chair is to deal  
5 with election office issues, and we've had lots of  
6 them giving people misinformation about absentee  
7 ballots. Recently 200 voters in this last election  
8 had premarked Republican forms by the election office  
9 supervisor who copied the wrong thing off of the  
10 election website. They were premarked until I got  
11 involved. I had to get involved to go down there to  
12 get those forms taken out of use. I did get the  
13 election supervisor at the Secretary of State's  
14 office involved in this incident. They were  
15 premarked Republican, and that went on for  
16 approximately 150 to 175 voters. However, those  
17 forms have no bearing on election results in an  
18 election of this type. Only when there is a primary  
19 but still they should not have been marked.

20 Q. And the premarked forms that you described,  
21 do I understand your testimony to be that it wasn't  
22 in connection with a primary?

23 A. No. It was this runoff election, last  
24 Tuesday's election.

25 Q. Oh, okay. I understand now. Thank you.

1           You mentioned that when you presented the 15  
2 forms in October of 2022 to Spalding County elections  
3 office and they initially told you that you couldn't  
4 present them, do you have any knowledge that they  
5 gave different information to folks who were white?

6           A.    It would be speculation. I don't have  
7 concrete facts for that.

8           Q.    Any other instance when you have been  
9 prevented from participating in the political process  
10 based on your race?

11          A.    Not that I can think of at the moment.

12          Q.    In your opinion in Georgia -- let me strike  
13 that.

14                Do you know what racially polarized voting  
15 is?

16          A.    Yes.

17          Q.    And what is your understanding of what  
18 racial polarized voting is?

19          A.    It's when one group vote -- an example. As  
20 you stated earlier, black folks vote for black folks  
21 or white folks vote for white folks.

22          Q.    You mentioned earlier that in your opinion  
23 black voters in Georgia typically vote for Democratic  
24 candidates. Do I have -- do I remember that  
25 correctly?

1 A. I said statistically. It wasn't an opinion.

2 Q. Okay. Do you know if Georgia uses majority  
3 vote requirements in elections?

4 A. Apparently not. Otherwise, we wouldn't have  
5 had the runoff election.

6 Q. Okay. And then -- but we did have runoff  
7 elections in 2021 and then again in the most recent  
8 election here in Georgia, correct?

9 A. Yes, we did. And the reason we had it was  
10 because we do not have majority.

11 Q. So you would agree, though, that the reason  
12 that it happened is because neither candidate --

13 A. Got 50 percent.

14 Q. Got 50 percent, okay.

15 A. So it's not based on majority.

16 Q. I don't understand what you mean.

17 A. Majority to me is the one that gets the  
18 highest number of votes, not 50 percent.

19 Q. Okay. I understand now.

20 Did you support Senator Ossoff in the  
21 general election in 2021?

22 A. Yes.

23 Q. Has a lack of education ever kept you from  
24 participating in the Georgia political process?

25 A. No.

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

3 A. No.

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

7 A. No.

8 Q. Have you ever heard of the term "racial  
9 appeal" in the context of elections?

10 A. I have, but I can't remember exactly what  
11 that means at this -- it's like you appeal only to  
12 minority groups or only to black votes or only to  
13 white.

14 Q. Have you personally seen campaigns in  
15 Georgia characterized by racial appeal?

16 A. Repeat the question again. I'm sorry.

17 Q. No problem.

18 Have you personally seen campaigns in  
19 Georgia characterized by racial appeal?

20 A. Yes.

21 Q. And what were those appeals?

22 A. I don't see it in the Democratic Party. We  
23 appeal to a big tent, but I see it in the Republican  
24 party when I pass by their events. I don't see any  
25 black people at their events, and I do not have them

1 reaching out to me. The only time they reach out is  
2 through a robo call, but I've never had one to  
3 personally appeal to me.

4 Q. Anything else that you would consider a  
5 racial appeal in connection with a campaign in  
6 Georgia?

7 A. No.

8 Q. Are there needs of the minority community in  
9 Georgia that in your opinion differ from those of  
10 white residents?

11 A. Yes.

12 Q. And what are the particular needs of the  
13 minority community are those?

14 A. Housing, healthcare, jobs for youths, food.  
15 And when I'm talking about food, I'm talking about  
16 fresh foods.

17 Q. And how is fresh foods -- how does that need  
18 differ in the minority communities from those in the  
19 white community?

20 A. It has to do with income. It has to do with  
21 the type of jobs that they work. They don't have  
22 time to prepare it because they're working two or  
23 three jobs to make ends meet.

24 Q. You spoke about different needs in housing.  
25 Tell me about that just generally.

1           A.     75 percent of the black population in  
2     Griffin, Georgia, live in apartments. They do not  
3     own homes.

4           Q.     And what is that statistic based on?

5           A.     Poverty level here in Spalding County and  
6     statistics for Spalding County.

7           Q.     So those would be statistics kept by the  
8     County?

9           A.     Yes.

10          Q.     And healthcare, how are the healthcare needs  
11     different?

12          A.     If people do not have health insurance, they  
13     cannot afford to go to the doctor and get regular  
14     checkups or go to the dentist, all those type of  
15     things.

16          Q.     And where are those statistics kept?

17          A.     We have what we call here in Spalding County  
18     a collaborative group that kind of do overarching --  
19     they try to reach out to community needs. It's  
20     called the Spalding County Collaborative. You can  
21     get all those statistics. They publish them  
22     annually.

23          Q.     And are the statistics that the Spalding  
24     County Collaborative publishes, are they just about  
25     Spalding County?

1 A. Yes. It's specific to Spalding County.

2 MS. LAROSS: I'm going to check my notes and  
3 see if I have any more questions. We'll just  
4 take a moment.

5 Mr. Solomon, those are all the questions I  
6 have. Thank you for your time. We very much  
7 appreciate the time that you spent here today  
8 with us.

9 MS. RUTAHINDURWA: I don't have any  
10 questions as well.

11 THE WITNESS: Thank you.

12 THE COURT REPORTER: Do y'all want to order  
13 the transcript?

14 MS. RUTAHINDURWA: Yes.

15 MS. LAROSS: Yes, I would like a copy.

16 (Proceedings concluded at 4:19 p.m.)

17 \* \* \*

18

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## 1 COURT REPORTER DISCLOSURES

2  
3 The following representations and disclosures  
4 are made in compliance with Georgia Law, more  
5 specifically:

6  
7 Article 10(B) of the Rules and Regulations  
8 of the Board of Court Reporting (disclosure forms)  
9 OCGA 9-11-28(c) (disqualification of reporter for  
10 financial interest) OCGA 15-14-37(a) and (b)  
11 (prohibitions against contracts except on a  
12 case-by-case basis).

- 13  
14 - I am a certified reporter in the State of Georgia.  
15 - I am a subcontractor for Veritext Legal Solutions.  
16 - I have been assigned to make a complete and  
17 accurate record of these proceedings.  
18 - I have no relationship of interest in the matter on  
19 which I am about to report which would disqualify me  
20 from making a verbatim record or  
21 maintaining my obligation of impartiality in  
22 compliance with the Code of Professional Ethics.  
23 - I have no direct contract with any party in this  
24 action and my compensation is determined solely  
25 by the terms of my subcontractor agreement.

## FIRM DISCLOSURES

- Veritext was contacted to provide reporting services by the noticing or taking attorney in this matter.
- There is no agreement in place that is prohibited by OCGA 15-14-37(a) and (b). Any case-specific discounts are automatically applied to all parties, at such time as any party receives a discount.
- Transcripts: The transcript of this proceeding as produced will be a true, correct, and complete record of the colloquies, questions, and answers as submitted by the certified court reporter.
- Exhibits: No changes will be made to the exhibits as submitted by the reporter, attorneys, or witnesses.
- Password-Protected Access: Transcripts and exhibits relating to this proceeding will be uploaded to a password-protected repository, to which all ordering parties will have access.

\* \* \*

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## CERTIFICATE

STATE OF GEORGIA:

COUNTY OF GWINNETT:

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

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

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

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

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

This the 26th day of December, 2022.



---

LAURA R. SINGLE, CCR-B-1343

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1 TO: MAKEBA RUTAHINDURWA, ESQ.

2 Re: Signature of Deponent ELBERT SOLOMON

3 Date Errata due back at our offices: 30 Days

4  
5 Greetings:

6 The deponent has reserved the right to read and sign.  
7 Please have the deponent review the attached PDF  
8 transcript, noting any changes or corrections on the  
9 attached PDF Errata. The deponent may fill out the  
10 Errata electronically or print and fill out manually.  
11 Once the Errata is signed by the deponent and  
12 notarized, please mail it to the offices of Veritext  
13 (below).

14 When the signed Errata is returned to us, we will  
15 seal and forward to the taking attorney to file with  
16 the original transcript. We will also send copies of  
17 the Errata to all ordering parties.

18  
19 If the signed Errata is not returned within the time  
20 above, the original transcript may be filed with the  
21 court without the signature of the deponent.

22 Please send completed Errata to:

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24 20 Mansell Court

25 Suite 300

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1 ERRATA

2 I, the undersigned, do hereby certify that I have read  
3 the transcript of my testimony, and that

4 \_\_\_\_ There are no changes noted.

5 \_\_\_\_ The following changes are noted:

6  
7 Pursuant to Rule 30(7)(e) of the Federal  
8 Rules of Civil Procedure and/or OCGA 9-11-30(e), any  
9 Changes in form or substance which you desire to make to  
10 your testimony shall be entered upon the deposition with  
11 a statement of the reasons given for making them. To  
12 assist you in making any such corrections, please use the  
13 form below. If additional pages are necessary, please  
14 furnish same and attach.

15 Page \_\_\_\_ Line \_\_\_\_ Change

16 Reason for change\_\_\_\_\_

17 Page \_\_\_\_ Line \_\_\_\_ Change\_\_\_\_\_

18 Reason for change\_\_\_\_\_

19 Page \_\_\_\_ Line \_\_\_\_ Change

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22 Reason for change\_\_\_\_\_

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24 Reason for change\_\_\_\_\_

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Reason for change\_\_\_\_\_

ELBERT SOLOMON

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

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

NOTARY PUBLIC

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

[&amp; - advocacy]

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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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