

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

Page 1

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., )

-----

The deposition of JACQUELYN BUSH 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 11:00 a.m.

## APPEARANCES

ON BEHALF OF THE PLAINTIFF:

MAKEBA RUTAHINDERWA, ESQUIRE

1700 Seventh Avenue NW

Suite 2100

Seattle, Washington 98101

mrutahindurwa@elias.law

ON BEHALF OF THE DEFENDANT:

HANNAH CLAPP, ESQUIRE

1600 Parkwood Circle SE

Suite 200

Atlanta, Georgia 30339

hclapp@taylorenghish.com

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

Page 3

## INDEX

Page

## Cross-Examination:

By Ms. Clapp. . . . . 4

## EXHIBITS

Page Marked/

Exhibit No.	Description	Identified
-------------	-------------	------------

1	Notice of Deposition	6
---	----------------------	---

2	Amended Complaint filed 3/29/22	23
---	---------------------------------	----

(Exhibits Not Attached)		
-------------------------	--	--

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

Page 4

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

10:58 a.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,

JACQUELYN BUSH,

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

## CROSS-EXAMINATION

BY MS. CLAPP:

MS. CLAPP: This will be the deposition of Ms. Jacquelyn Bush, taken by the Defendant, Secretary of State Brad Raffensperger, and members of the State Election Board, for the purpose of discovery and for all purposes allowed under the Federal Rules of Civil Procedure. All objections, except those going to the form of the question and the responsiveness of the answer are reserved until trial or the first use of the deposition.

Are those stipulations agreeable to you, Ms. Rutahinderwa? I'm sorry. I butchered your last name.

MS. RUTAHINDERWA: That's okay. I agree.

1 MS. CLAPP: Thank you. And how do you wish to handle  
2 signature?

3 MS. RUTAHINDERWA: We'll reserve signature.

4 MS. CLAPP: Okay. Great. Thank you.

5 BY MS. CLAPP (Resuming)

6 Q Ms. Bush, my name is Hannah Clapp. I'm an attorney  
7 with Taylor, English, Duma. I represent the Defendants in this  
8 matter.

9 The purpose of this deposition is not to confuse you, so if  
10 I ask you a question that you don't understand, or you can't  
11 hear me, can you agree that you will let me know?

12 A Yes.

13 Q Great. Thank you. And for the court reporter, I  
14 think Ms. Williams already mentioned, but please speak clearly  
15 and loudly -- loud enough so she can hear and be sure to say  
16 "yes" and "no," as opposed to "Uh-huh" or "Huh-uh," and try to  
17 give audible answers as opposed to nodding your head up and  
18 down. Do you understand?

19 A Yes.

20 Q It's important that we not speak at the same time, as  
21 well. It's a little bit difficult over Zoom, so please wait  
22 until I complete my question before you answer.

23 If you need a break at any time, please just let me know.  
24 You can wave, you can say, Ms. Clapp, you know, I just need a  
25 break from your relentless questioning, just let me know.

1 We also ask that you do not have any electronic devices  
2 available during your deposition, including your cell phone, you  
3 know, if you have your email up, you've got the TV going on in  
4 the background. Certainly, you'll need to keep Zoom open on  
5 your computer, but do you agree to not have your cell phone on,  
6 your email, text messaging, or any social media open during your  
7 deposition?

8 A Yes.

9 Q Great. Thank you. Okay. I'll go ahead and share my  
10 screen.

11 THE COURT REPORTER: Okay. It should now be enabled.

12 MS. CLAPP: Thank you.

13 BY MS. CLAPP (Resuming)

14 Q Ms. Bush, can you see your deposition notice?

15 A Yes.

16 Q Okay. We're marking this as Exhibit No. 1.

17 Ms. Bush, this is the Defendant's Notice To Take The  
18 Deposition of Jacquelyn Bush. Are you familiar with this  
19 document?

20 (Exhibit 1 was displayed on screen for review.)

21 A Are you speaking to me?

22 Q Yes, ma'am. Are you familiar with this document?

23 A Yes, I am.

24 Q Okay. Perfect. I'll go ahead and stop sharing.

25 We'll do a few preliminary questions before we get into the

1 meat of the matter.

2 Have you ever given testimony before today, whether that  
3 was in a deposition or a trial?

4 A Yes.

5 Q In what context would that have been?

6 A It was work-related.

7 Q Was it in a deposition?

8 A Yes.

9 Q Okay. Was it just the one time that you gave  
10 testimony?

11 A Yes.

12 Q Did the case go to trial?

13 A No.

14 Q Do you know what kind of case it was?

15 A I don't recall.

16 Q Do you remember what happened to the case?

17 A No.

18 Q Okay. Do you remember about what year it would have  
19 been?

20 A It would have been more than 20 years ago.

21 Q Okay. I see why you don't remember. That's a long  
22 time ago.

23 Okay. And have you taken any medications today that would  
24 keep you from fully and truthfully participating in today's  
25 deposition?

1 A No.

2 Q And you have any medical conditions that would keep  
3 you from fully and truthfully participating in today's  
4 deposition?

5 A No.

6 Q All right. Have you ever been involved in any prior  
7 lawsuits with -- sorry -- whether that be yourself or a family  
8 member, regarding any election-related cases?

9 A Regarding what?

10 Q Election-related cases.

11 A No.

12 Q Have you made any prior claims, whether that be  
13 yourself or a family member, related to any election-related  
14 claims?

15 A No.

16 Q Have you ever been charged with a crime?

17 A No.

18 Q Have you ever been arrested?

19 A No.

20 Q And have you ever been convicted of a crime?

21 A No.

22 Q All right. And without going into specifics, did you  
23 discuss this case with anyone other than your lawyer?

24 A No.

25 Q Have you discussed this deposition with anyone other



1 than your lawyer?

2 A No.

3 Q All right. And again, without going into any of the  
4 detail about anything you may have discussed with your  
5 attorneys, did you review anything to prepare for today's  
6 deposition?

7 A Yes.

8 Q What did you look at?

9 A I looked at the lawsuit itself.

10 Q When you say the lawsuit, are you referring to the  
11 Complaint?

12 A Yes, the Complaint.

13 Q Okay. What made you look at that?

14 A It was emailed to me in preparation for the meeting,  
15 so of course, when I opened it up, I saw those documents and I  
16 looked over them.

17 Q Had you seen the Complaint before?

18 A Yes.

19 Q Okay. And did that document help you refresh your  
20 recollection as to the events that you will testify here to,  
21 today?

22 A Yes.

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

24 A No.

25 Q Do you have any notes, or memos, or other documents

1 that relate any way to this case?

2 A No.

3 Q All right. Okay. For the record, will you please  
4 state your full name and your current address?

5 A Jacquelyn Bush. [REDACTED] Fayetteville,  
6 Georgia [REDACTED].

7 Q Is that within the city limits of Fayetteville?

8 A No. Actually, it's outside of the city limits.

9 Q Okay. And which county is that in?

10 A Fayette.

11 Q And how long have you lived at that [REDACTED] [REDACTED]  
12 [REDACTED] address?

13 A Since October of 1987.

14 Q All right. And did you have any other addresses  
15 before 1987?

16 A No.

17 Q Where did you reside before that [REDACTED]  
18 address?

19 A In College Park.

20 Q And what time frame would that have been?

21 A That would have been probably two years prior to  
22 moving here -- so the two years prior.

23 Q And where did you live before College Park?

24 A Stone Mountain, Georgia.

25 Q What time period was that?

1 A That was probably three years prior to College Park.

2 Q And have you ever resided in any other state?

3 A Yes.

4 Q What states would that have been?

5 A Florida.

6 Q Florida? I'm from Florida. I'm so sorry. What part  
7 of Florida were you in?

8 A Stuart.

9 Q Okay. You said Stuart?

10 A Stuart, Florida.

11 Q Okay.

12 A It's the southeast coast.

13 Q And what time period was that?

14 A I was born there, and I lived in Florida -- in Stuart,  
15 and then school in Gainesville, until I moved here. And I moved  
16 here in 1979.

17 Q Okay. What made you move to Georgia?

18 A Work.

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

20 A Home.

21 Q And is that the [REDACTED] address?

22 A Yes.

23 Q Great. Thank you.

24 A I'm sorry. Did you say [REDACTED]?

25 Q [REDACTED]

1 A It's [REDACTED]

2 Q [REDACTED]

3 A Yes.

4 Q Okay. Thank you for that clarification. I'll turn my  
5 volume up now. Do you have an attorney there with you?

6 A No. Here in my home?

7 Q Correct.

8 A No.

9 Q Okay. And is there anyone else in the room with you?

10 A No.

11 Q All right. So let's go to your education. I heard  
12 you were in Gainesville. Were you at the University of Florida?

13 A Yes.

14 Q Another apology. I'm sorry. My mother goes to  
15 Florida State, so I'm a little partial.

16 What years were you at University of Florida?

17 A From 1973 through June 1977.

18 Q What did you study?

19 A Journalism.

20 Q Journalism. What made you want to study journalism?

21 A I really don't know. I liked the subject.

22 Q Sometimes that's all you need. All right and where  
23 did you go to high school?

24 A Martin County High School.

25 Q And what year did you graduate?

1 A 1973.

2 Q All right. And did you go to graduate school after  
3 you studied journalism?

4 A No.

5 Q And do you have any other kind of formal training?

6 A No.

7 Q Do you have any licenses?

8 A No.

9 Q Any certifications?

10 A Yes.

11 Q What kind of certifications?

12 A For public relations. And I have expired  
13 certifications for teaching, also in the state of Florida.

14 Q what did you teach?

15 A I taught different subjects in high school.

16 Q What was your favorite one?

17 A History.

18 Q That's a good one. All right. So we kind of touched  
19 on your employment history a little bit. So when you graduated  
20 with your degree in journalism, what was your first job after  
21 that?

22 A First job after that was marketing - actually, let me  
23 take that back. I was still in Florida, and I worked in public  
24 relations for a community center.

25 Q How long were you there?

1 A For 18 months.

2 Q And what did you do after that?

3 A I moved to Atlanta, and I had various jobs in -- I've  
4 had jobs in retail, I've had jobs in marketing.

5 Q How long would those various jobs last approximately?

6 A A year. I would say a year.

7 Q Okay. So how long did you continue to have various  
8 jobs like that?

9 A Well after that, I went to work for a company --  
10 BellSouth --

11 Q Uh-huh.

12 A -- that I retired from. So I worked for them for 25  
13 years.

14 Q Wow. What did you do for BellSouth?

15 A Various jobs -- again, in management. I worked from a  
16 PR standpoint mostly.

17 Q And you said you worked there for 25 years. What time  
18 period would that have been?

19 A Let's see. I can tell you when I retired.

20 Q That works. I can work backwards from there.

21 A I retired December 16th, 2008.

22 Q You know right down to the day.

23 A Yes.

24 Q Okay. And what have you been doing since then?

25 A Gardening and having fun.

1 Q What kind of gardening are you into?

2 A I like landscaping. So planting flowers, shrubs, and  
3 vegetables.

4 Q That sounds nice.

5 A Uh-huh.

6 Q All right. So you left BellSouth because you retired  
7 -- or why did you leave?

8 A I retired. I retired on the last day I could retire  
9 with Bellsouth. Bellsouth had a lot of changes going on, so  
10 there was a merger and I decided to take an offer to retire the  
11 last day I could retire as a BellSouth employee.

12 Q Okay. And why did -- you said when you were working  
13 various jobs in retail marketing for about a year, why would you  
14 leave those jobs?

15 A Because they weren't what I wanted to do. You know, I  
16 was staying busy. I was working because I was supporting  
17 myself, but --

18 Q Okay.

19 A -- I would move on.

20 Q Did you have any kids?

21 A Yes.

22 Q How many kids do you have?

23 A 2.

24 Q Do you have a boy and girl?

25 A Yes.

1 Q Who's older?

2 A My son.

3 Q Okay. And when you worked at BellSouth, were you  
4 full-time?

5 A Yes.

6 Q So would you say about 40 hours a week?

7 A Yes.

8 Q Okay. All right. Onto your voter registration and  
9 history. Are you registered to vote in Georgia?

10 A Yes.

11 Q And do you remember where you registered to vote?

12 A Yes. I'm registered in Fayette County. You mean  
13 where I went when I registered?

14 Q Yes, ma'am, where you first, you know, signed up to  
15 vote.

16 A At the registration office in Fayette County.

17 Q Okay. Is College Park in Fayette County?

18 A No, it isn't. And I was registered to vote before  
19 moving here, but when I moved here, I moved my registration. I  
20 don't know where I initially registered in Georgia --

21 Q Uh-uh.

22 A -- but I had voted prior to voting in Fayette County.

23 Q Okay. Do you remember what location you would have  
24 voted at that time?

25 A At that time, no.



1 Q All right. And when did you register in Fayette  
2 County?

3 A I believe it was January of 1988. It was right after  
4 I moved here.

5 Q And were you registered in Florida when you lived  
6 there?

7 A Yes.

8 Q And are you registered to vote at your current  
9 address?

10 A Yes.

11 Q Do you know what district you resided in before the  
12 recent redistricting took effect?

13 A District for Senate -- 16, and the other was 74.

14 Q Okay. Do you know what you are now?

15 A No.

16 Q And do you know if you voted in each election in  
17 Georgia?

18 A Yes, as far as I can remember. I don't recall missing  
19 any --

20 Q Okay.

21 A -- however, when I looked at my voter's record,  
22 probably a couple of years ago, it appeared to me that some  
23 dates -- that one or two dates were missing.

24 Q Okay. Do you recall which two dates those would have  
25 been?

1 A No.

2 Q All right. So I asked if you voted in each election.  
3 Have you voted in the presidential primaries?

4 A Yes.

5 Q Have you voted in general elections?

6 A Yes.

7 Q Have you voted in special elections?

8 A Yes.

9 Q Okay. And do you know what precinct you voted for --  
10 or voted in the November 2022 election?

11 A I actually voted by absentee ballot.

12 Q Okay.

13 A I don't know where my precinct is located, but prior  
14 to that, I've been doing early voting. So I would go to the  
15 registrar's office.

16 Q Okay. Where is your physical precinct's location?

17 A It's about a mile from me at Southside Baptist Church,  
18 which is off 92 South.

19 Q All right. And where did you vote for the runoff --  
20 in the runoff?

21 A I voted absentee.

22 Q Okay. Onto your political affiliations. Do you  
23 consider yourself to be a member of the Democratic Party?

24 A Yes.

25 Q And since when?

1 A Since I initially registered to vote, so always.

2 Q And have you held any leadership positions in that  
3 party?

4 A No.

5 Q Have you ever held any position or served on any  
6 commission of the Democratic Party?

7 A No.

8 Q Have you participated in any activities of the  
9 Democratic Party?

10 A I don't understand.

11 Q I think -- like voter registration drives, things like  
12 that?

13 A Yes.

14 Q Okay. Can you explain what activities and when?

15 A Yes. In 2008, I did participate in going door-to-  
16 door, getting people to register to vote.

17 Q Is there anything else?

18 A No.

19 Q Have you ever considered yourself to be a member of  
20 the Republican Party?

21 A No.

22 Q Is it fair to say you generally support Democratic  
23 candidates for elections in Georgia?

24 A Yes.

25 Q Have you ever voted for any Republican candidate?

1 A No, not that I recall.

2 Q Have you ever been a member or held any position in  
3 any other political party?

4 A No.

5 Q Have you worked on any political campaigns?

6 A Yes.

7 Q Okay. Who would that have been?

8 A I worked on the presidential campaign for President  
9 Obama.

10 Q Was that in 2008?

11 A Yes.

12 Q Any other campaigns?

13 A I worked to support Andrew Young's campaign.

14 Q And what year would that have been?

15 A I'm not sure.

16 Q And what kind of work did you do for President Obama's  
17 campaign?

18 A I did Getting Out to Vote -- did phone banks.

19 Q That's tough work. Probably get a lot of people  
20 hanging up. And then what kind of work did you do for Andrew  
21 Young's campaign?

22 A The same.

23 Q All right. Are you involved with any voter advocacy  
24 groups?

25 A No.

1 Q All right. So moving onto the history of the case.

2 When did you first learn about the lawsuit?

3 A I'm really not sure, probably at least a year ago.

4 Q Who did you learn about it from?

5 A I believe a phone call -- over the phone.

6 Q Do you remember who called you?

7 A No.

8 Q Do you know if it was an attorney?

9 A No. I don't know.

10 Q Okay. Do you remember what they told you?

11 A I believe it was more like marketing, I guess -- a  
12 survey. When you're asking people questions and they asked me  
13 what my feelings were about certain things, and then I was later  
14 asked if I would be interested in taking part.

15 Q And when were you approached or contacted by an  
16 attorney about the case?

17 A All my contact has been by email, and I get a lot of  
18 emails, so I'm not sure.

19 Q What made you decide to join the case to the Secretary  
20 of State?

21 A The merits of the case.

22 Q Can you elaborate a little bit?

23 A Well, I believe that it would be the right thing to  
24 do. I am concerned about the redistricting that's taken place,  
25 so I wanted to do what I could.

1 Q And what are you hoping this lawsuit accomplishes?

2 A I hope it will bring attention and that the right  
3 thing is done, and I hope they'll take consideration when -- in  
4 drawing the districts so that it becomes more inclusive to  
5 represent the Georgia people -- all of the demographics.

6 Q Okay. And how did you find out about the attorneys on  
7 the case?

8 A By email.

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

11 A No.

12 Q And what kind of research did you do concerning the  
13 issues in this case?

14 A Well I'm just aware of it because I do read.

15 Q Okay. It's hard to miss when it's all over the  
16 Georgia news, you know? What kind of research did you do  
17 concerning the issues -- concerning your attorneys?

18 A None.

19 Q Do you know if there is any kind of contract between  
20 you and your attorneys?

21 A No.

22 Q Are you getting paid to participate in this lawsuit?

23 A No.

24 Q Are you receiving anything of value in exchange for  
25 your participation in this lawsuit?

1 A No.

2 Q All right. I'm going to go ahead and share my screen  
3 again. Give me just one second.

4 I'm showing what is now marked as Exhibit 2, for purposes  
5 of this deposition. It is the amended complaint filed March 29,  
6 2022. Have you ever seen this document before, Ms. Bush?

7 (Exhibit No. 2 was displayed on screen for review.)

8 A Yes.

9 Q I'll scroll a little bit too, so you know what you're  
10 looking at. So you have seen this document before?

11 A Yes.

12 Q Okay. Perfect. Have you ever read this document in  
13 its entirety?

14 A Yes.

15 Q And you know the allegations contained in this  
16 document?

17 A Yes.

18 Q Okay. I'll stop sharing.

19 All right. Did you reach out to any legislator during the  
20 2021 special session due to the issues raised in your complaint?

21 A No.

22 Q How about before or after the special session?

23 A No.

24 Q All right. Did you testify in the Georgia assembly on  
25 those issues or any issues pertaining to redistricting in 2021?

1 A No.

2 Q Did you attend any hearings in the Georgia legislature  
3 pertaining to redistricting?

4 A No.

5 Q Did you attend any other meetings concerning  
6 redistricting in 2021?

7 A No.

8 Q Do you know what the term "community of interest"  
9 means?

10 A Community of interest?

11 Q Yes, ma'am.

12 MS. RUTAHINDERWA: Objection. That calls for legal  
13 conclusion. You can answer if you know.

14 A No. Because I don't know what context she might be  
15 talking about. No.

16 BY MS. CLAPP (Resuming)

17 Q All right. Can you describe your community? Not as  
18 it relates to community of interest, but what you would consider  
19 your community.

20 A My community. I would assume it's the people I live  
21 around.

22 Q Okay. And where would you say you're from?

23 A I would say I'm from Fayetteville, Georgia. I would  
24 also say I'm from the state of Georgia. I'm from Fayette  
25 County, so my community expands.



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

3 A Yes.

4 Q What would those associations have been?

5 A Well, it's various associations, but they're mostly  
6 neighborhood. Different interests, nonpolitical.

7 Q Okay. What kinds of things would they do?

8 A Sometimes it's entertainment for our children, in the  
9 past; neighborhood gardening; neighborhood -- just associating  
10 and getting together and socializing.

11 Q How long were you a part of those associations?

12 A It's ongoing.

13 Q Ongoing. Do you know when you first got involved?

14 A Let me make sure we're -- when you say associations,  
15 you're talking about a club or a group?

16 Q It doesn't have to be a formal club or a group, but  
17 sure, that definition works, or like a homeowner's association.  
18 It kind of varies depending on your understanding of what, you  
19 know, you would consider an association.

20 A Okay. Because I've always been involved.

21 Q Okay. Are you a member of any faith-based group or  
22 organization?

23 A Yes.

24 Q And where is that located?

25 A College Park, Georgia.

1 Q Is it a church, mosque, or synagogue?

2 A It's a church.

3 Q And how close is that to your home?

4 A 8 miles.

5 Q And how long have you been a part of that church?

6 A For three years.

7 Q Were you at a different church before then?

8 A Yes.

9 Q And what church was that?

10 A That was a church in College Park, Georgia.

11 Q Do you remember the name?

12 A That church -- no, I don't remember the name of that  
13 one.

14 Q What is your current church's name?

15 A World Changers International.

16 Q Could you spell that?

17 A World. W-o-r-l-d.

18 Q Okay.

19 A And let me correct myself.

20 Q Yes, ma'am.

21 A Prior to World Changers, my church was in Jonesboro,  
22 Georgia --

23 Q Okay.

24 A -- and College Park was long before that. But  
25 Jonesboro, Georgia. And that was Divine Faith.

1 Q Okay. How far is Jonesboro from where you're at now?

2 A 8 miles.

3 Q Oh. Okay. Okay. And your current church in College  
4 Park, do you regularly attend services there?

5 A Yes.

6 Q And what activities or groups in your place of worship  
7 do you participate in?

8 A None.

9 Q Are you involved in any school associations or  
10 activities?

11 A No.

12 Q And where do you do your shopping?

13 A For?

14 Q I'd say groceries.

15 A Oh. Okay.

16 Q Sorry. Shopping is very broad. I'll try to be more  
17 specific.

18 A And when you say "where," are you talking about  
19 location, or store name?

20 Q Generally location?

21 A Fayetteville.

22 Q All right. And outside of work and church, where do  
23 you spend most of your time?

24 A At home.

25 Q All right. Have you ever been prohibited to

1 registering to vote based on your race?

2 A No.

3 Q Have you ever been prohibited from participating in  
4 the political process based on your race?

5 A No.

6 Q Do you have any personal knowledge of discrimination  
7 by the government of Georgia, against members of a minority  
8 group, related to participation in the democratic process?

9 A Could you repeat that?

10 Q Sure. Do you have any personal knowledge of  
11 discrimination by the government of Georgia against members of a  
12 minority group, related to participation in the democratic  
13 process?

14 A No.

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

17 A Yes.

18 Q Do you personally know any black voters who have told  
19 you they have voted for Republican candidates?

20 A Yes.

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

23 A Yes.

24 Q You'd agree that the majority vote requirement led to  
25 the runoff in 2021; correct?

1 A Yes.

2 Q Then that resulted in the election of Senator Warnock  
3 and Senator Ossoff; correct?

4 A That's correct.

5 Q And those were candidates that you supported, right?

6 A Yes.

7 Q And are you familiar with the term "candidate slating  
8 process," as it's used in elections?

9 A I didn't hear that. Candidate what?

10 Q Slating process.

11 A Slating?

12 Q Yes, ma'am. Like S-l-a-t-i-n-g.

13 A No.

14 Q Okay. In your opinion, does a lack of education keep  
15 people of color from participating in Georgia politics?

16 A I don't know.

17 Q Do you believe a lack of employment opportunities keep  
18 people of color from participating in Georgia politics?

19 A I'm not sure.

20 Q Does a lack of access to health services, in your  
21 opinion, keep people of color from participating in Georgia  
22 politics?

23 A I'm not sure.

24 Q Are you familiar with the term "racial appeals" when  
25 used in the context of elections?

1 A Racial appeals?

2 Q Yes.

3 A I believe so.

4 Q Have you personally seen campaigns in Georgia  
5 characterized by racial appeals?

6 A Yes.

7 Q What were those appeals?

8 A Some of them are to appeal to make voters frightened  
9 of certain people by doing certain things -- bringing up certain  
10 things.

11 Q Can you be more specific as to what those things were?

12 A Yes. Yes. When they talk about crime, and this is  
13 going to happen to you if you vote this way, or that way, or  
14 even things like darkening of skins to scare certain people, to  
15 make them feel afraid of certain candidates and what they might  
16 represent.

17 Q Are there any other racial appeals that you know of?

18 A No, not specifically.

19 Q Not downplaying what you've already mentioned, just a  
20 follow-up question.

21 And have you seen the similar treatment of Republican white  
22 and black candidates?

23 A No.

24 Q Do you know how many black people have run for office  
25 in Georgia?

1 A No. I don't.

2 Q Do you know how many black people have been elected to  
3 public office in Georgia?

4 A No. I don't.

5 Q And did you know the former Chief Justice of the  
6 Georgia Supreme Court was black and that the position is an  
7 elected one?

8 A Yes.

9 Q And are you aware that in 2021, Senator Warnock, a  
10 black candidate, was voted statewide to the United States  
11 Senate?

12 A Yes.

13 Q And are you aware that Herschel Walker, another black  
14 candidate, was running on the Republican ticket and was elected  
15 by a white margin in the Republican primary by exclusively  
16 Republican voters?

17 A Yes.

18 Q And are you aware that the United States Senate is a  
19 statewide office and that most major political parties are  
20 represented by both people who are black?

21 A Yes.

22 Q All right. Are there any needs of the minority  
23 community in Georgia that, in your opinion, differ of those of  
24 white residents?

25 A Could you repeat that?

1 Q Sure. Are there any needs of the minority community  
2 in Georgia that, in your opinion, differ of those of the white  
3 residents?

4 A No.

5 Q And are there any particular needs of the minority  
6 community in Georgia, in your view?

7 A You said are there any particular needs?

8 Q Yes, ma'am. It's kind of a follow-up question to my  
9 last question. But are there any particular needs of the  
10 minority community in Georgia?

11 A Well, I feel that if all things are equal then the  
12 needs would be the same.

13 Q You started off with, "if all things were equal."

14 A Yes.

15 Q Does that mean that you do not think that things are  
16 equal?

17 A Right. And that goes back to the question you asked  
18 me before, if I felt that the needs were different. No, because  
19 I feel that people are the same. So if everything is equal then  
20 we need the same thing everyone else needs, is what I'm saying.

21 Q All right. Makeba, I think that's all I have.

22 Ms. Bush, I don't have any follow-up questions, so unless  
23 your attorney has any, you are free to go.

24 MS. RUTAHINDERWA: No. I don't have any questions.

25 MS. CLAPP: Great. Thank you for your time today, Ms.



1 Bush. I appreciate you answering my questions thoroughly  
2 and honestly. We know it's a time commitment to do this  
3 kind of thing, so I do appreciate you being here today.

4 THE WITNESS: Okay. Well, thank you.

5 (The deposition concluded at approximately 11:58 a.m.)  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

Page 34

## 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, JACQUELYN BUSH, 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

[00122 - atlanta]

Page 1

<b>0</b>	<b>2100</b> 2:4	<b>access</b> 29:20	<b>annie</b> 1:5
<b>00122</b> 1:6	<b>23</b> 3:10	<b>accomplishes</b>	<b>answer</b> 4:21
<b>1</b>	<b>24th</b> 1:15 34:9	22:1	5:22 24:13
<b>1</b> 3:9 6:16,20	34:15	<b>action</b> 1:6	<b>answering</b> 33:1
<b>10:58</b> 4:2	<b>25</b> 14:12,17	34:14	<b>answers</b> 5:17
<b>110</b> 10:5 11:21	<b>28219</b> 34:17	<b>activities</b> 19:8	34:7
<b>11:00</b> 1:16	<b>29</b> 23:5	19:14 27:6,10	<b>apology</b> 12:14
<b>11:58</b> 33:5	<b>3</b>	<b>actually</b> 10:8	<b>appeal</b> 30:8
<b>16</b> 17:13	<b>3/29/22</b> 3:10	13:22 18:11	<b>appeals</b> 29:24
<b>1600</b> 2:8	<b>30215</b> 10:6	<b>address</b> 10:4,12	30:1,5,7,17
<b>16th</b> 14:21	<b>30339</b> 2:9	10:18 11:21	<b>appearances</b>
<b>1700</b> 2:3	<b>4</b>	17:9	2:1
<b>18</b> 14:1	<b>4</b> 3:4 4:6	<b>addresses</b>	<b>appeared</b> 17:22
<b>1973</b> 12:17	<b>40</b> 16:6	10:14	<b>appreciate</b> 33:1
13:1	<b>6</b>	<b>advocacy</b> 20:23	33:3
<b>1977</b> 12:17	<b>6</b> 3:9	<b>affiliations</b>	<b>approached</b>
<b>1979</b> 11:16	<b>6199-8887-6...</b>	18:22	21:15
<b>1987</b> 10:13,15	34:19	<b>afraid</b> 30:15	<b>approximately</b>
<b>1988</b> 17:3	<b>7</b>	<b>ago</b> 7:20,22	14:5 33:5
<b>1:22</b> 1:6	<b>74</b> 17:13	17:22 21:3	<b>arrested</b> 8:18
<b>2</b>	<b>8</b>	<b>agree</b> 4:25 5:11	<b>asked</b> 18:2
<b>2</b> 3:10 15:23	<b>8</b> 26:4 27:2	6:5 28:24	21:12,14 32:17
23:4,7	<b>9</b>	<b>agreeable</b> 4:23	<b>asking</b> 21:12
<b>20</b> 7:20	<b>9-11-28</b> 4:4	<b>agreed</b> 4:5	<b>assembly</b> 23:24
<b>200</b> 2:9	<b>9-11-30</b> 4:5	<b>ahead</b> 6:9,24	<b>associating</b>
<b>2008</b> 14:21	<b>92</b> 18:18	23:2	25:9
19:15 20:10	<b>98101</b> 2:5	<b>al</b> 1:5,9	<b>association</b>
<b>2021</b> 23:20,25	<b>a</b>	<b>allegations</b>	25:17,19
24:6 28:25	<b>a.m.</b> 1:16 4:2	23:15	<b>associations</b>
31:9	33:5	<b>allowed</b> 4:19	25:2,4,5,11,14
<b>2022</b> 18:10	<b>absentee</b> 18:11	<b>amended</b> 3:10	27:9
23:6	18:21	23:5	<b>assume</b> 24:20
<b>2023</b> 1:15 34:9		<b>andrew</b> 20:13	<b>atlanta</b> 1:3 2:9
34:15		20:20	14:3

[attached - company]

Page 2

<b>attached</b> 3:11 <b>attend</b> 22:9 24:2,5 27:4 <b>attention</b> 22:2 <b>attorney</b> 5:6 12:5 21:8,16 22:10 32:23 34:11,12 <b>attorneys</b> 9:5 22:6,17,20 <b>audible</b> 5:17 <b>available</b> 6:2 <b>avenue</b> 2:3 <b>aware</b> 22:14 31:9,13,18	<b>bit</b> 5:21 13:19 21:22 23:9 <b>black</b> 28:15,18 30:22,24 31:2 31:6,10,13,20 <b>board</b> 4:18 <b>born</b> 11:14 <b>boy</b> 15:24 <b>brad</b> 1:8 4:17 <b>break</b> 5:23,25 <b>bring</b> 22:2 <b>bringing</b> 30:9 <b>bristol</b> 10:5 11:24 12:1,2 <b>broad</b> 27:16 <b>bush</b> 1:12 4:10 4:16 5:6 6:14 6:17,18 10:5 23:6 32:22 33:1 34:10 <b>busy</b> 15:16 <b>butchered</b> 4:24	<b>candidates</b> 19:23 28:16,19 29:5 30:15,22 <b>can't</b> 5:10 <b>capacity</b> 1:8 <b>caption</b> 34:6 <b>carroll</b> 34:4 <b>case</b> 7:12,14,16 8:23 10:1 21:1 21:16,19,21 22:7,10,13 <b>cases</b> 8:8,10 <b>ccr</b> 1:15 34:18 <b>cell</b> 6:2,5 <b>center</b> 13:24 <b>certain</b> 21:13 30:9,9,9,14,15 <b>certainly</b> 6:4 <b>certifications</b> 13:9,11,13 <b>certified</b> 34:18 <b>certify</b> 34:5 <b>changers</b> 26:15 26:21 <b>changes</b> 15:9 <b>characterized</b> 30:5 <b>charged</b> 8:16 <b>chief</b> 31:5 <b>children</b> 25:8 <b>church</b> 18:17 26:1,2,5,7,9,10 26:12,21 27:3 27:22	<b>church's</b> 26:14 <b>circle</b> 2:8 <b>city</b> 10:7,8 <b>civil</b> 1:6 4:19 <b>claims</b> 8:12,14 <b>clapp</b> 2:8 3:4 4:14,15 5:1,4,5 5:6,24 6:12,13 24:16 32:25 <b>clarification</b> 12:4 <b>clearly</b> 5:14 <b>close</b> 26:3 <b>club</b> 25:15,16 <b>coast</b> 11:12 <b>college</b> 10:19 10:23 11:1 16:17 25:25 26:10,24 27:3 <b>color</b> 29:15,18 29:21 <b>commencing</b> 1:16 <b>commission</b> 19:6 <b>commitment</b> 33:2 <b>community</b> 13:24 24:8,10 24:17,18,19,20 24:25 25:2 31:23 32:1,6 32:10 <b>company</b> 14:9
<b>b</b>			
<b>b</b> 4:6 12:2 <b>back</b> 13:23 32:17 <b>background</b> 6:4 <b>backwards</b> 14:20 <b>ballot</b> 18:11 <b>banks</b> 20:18 <b>baptist</b> 18:17 <b>based</b> 25:21 28:1,4 <b>behalf</b> 2:2,7 <b>believe</b> 17:3 21:5,11,23 29:17 30:3 <b>bellsouth</b> 14:10 14:14 15:6,9,9 15:11 16:3	<b>c</b> <b>c</b> 4:1 34:2,2 <b>call</b> 21:5 <b>called</b> 4:11 21:6 <b>calls</b> 24:12 <b>campaign</b> 20:8 20:13,17,21 <b>campaigns</b> 20:5,12 30:4 <b>candidate</b> 19:25 29:7,9 31:10,14		

**[complaint - downplaying]**

Page 3

<b>complaint</b> 3:10 9:11,12,17 23:5,20 <b>complete</b> 5:22 34:8 <b>complied</b> 4:3 <b>computer</b> 6:5 <b>concerned</b> 21:24 <b>concerning</b> 22:12,17,17 24:5 <b>concluded</b> 33:5 <b>conclusion</b> 24:13 <b>conditions</b> 8:2 <b>confuse</b> 5:9 <b>consider</b> 18:23 24:18 25:19 <b>consideration</b> 22:3 <b>considered</b> 19:19 <b>contact</b> 21:17 <b>contacted</b> 21:15 <b>contained</b> 1:13 23:15 <b>context</b> 7:5 24:14 29:25 <b>continue</b> 14:7 <b>contract</b> 22:19 <b>convicted</b> 8:20 <b>correct</b> 12:7 26:19 28:25	29:3,4 34:8 <b>counsel</b> 34:11 34:12 <b>county</b> 10:9 12:24 16:12,16 16:17,22 17:2 24:25 34:4 <b>couple</b> 17:22 <b>course</b> 9:15 <b>court</b> 1:1 4:3 5:13 6:11 10:5 10:12,17 11:21 11:24 31:6 34:18 <b>crime</b> 8:16,20 30:12 <b>cross</b> 3:3 4:13 <b>crystal</b> 10:11 10:17 11:21,24 11:25 <b>current</b> 10:4 17:8 26:14 27:3 <b>cv</b> 1:6	<b>decide</b> 21:19 <b>decided</b> 15:10 <b>defendant</b> 2:7 4:16 <b>defendants</b> 5:7 <b>defendant's</b> 6:17 <b>definition</b> 25:17 <b>degree</b> 13:20 <b>democratic</b> 18:23 19:6,9 19:22 28:8,12 28:16 <b>demographics</b> 22:5 <b>depending</b> 25:18 <b>deposed</b> 4:12 <b>deposition</b> 1:12 1:14 3:9 4:15 4:22 5:9 6:2,7 6:14,18 7:3,7 7:25 8:4,25 9:6 23:5 33:5 34:5 <b>describe</b> 24:17 <b>description</b> 3:8 <b>detail</b> 9:4 <b>devices</b> 6:1 <b>didn't</b> 29:9 <b>differ</b> 31:23 32:2 <b>different</b> 13:15 25:6 26:7 32:18	<b>difficult</b> 5:21 <b>discovery</b> 4:18 <b>discrimination</b> 28:6,11 <b>discuss</b> 8:23 22:9 <b>discussed</b> 8:25 9:4 <b>displayed</b> 6:20 23:7 <b>district</b> 1:1,2 17:11,13 <b>districts</b> 22:4 <b>divine</b> 26:25 <b>division</b> 1:3 <b>document</b> 6:19 6:22 9:19 23:6 23:10,12,16 <b>documents</b> 9:15,23,25 <b>doesn't</b> 25:16 <b>doing</b> 14:24 18:14 30:9 <b>don't</b> 5:10 7:15 7:21 12:21 16:20 17:18 18:13 19:10 21:9 24:14 26:12 29:16 31:1,4 32:22 32:24 <b>door</b> 19:15,16 <b>downplaying</b> 30:19
	<b>d</b> 1:14 4:1,4 26:17 34:18 <b>darkening</b> 30:14 <b>dates</b> 17:23,23 17:24 <b>day</b> 14:22 15:8 15:11 34:15 <b>december</b> 14:21		

[drawing - given]

Page 4

<b>drawing</b> 22:4 <b>drives</b> 19:11 <b>due</b> 23:20 <b>duly</b> 4:11 34:10 <b>duma</b> 5:7	<b>entirety</b> 23:13 <b>equal</b> 32:11,13 32:16,19 <b>esquire</b> 2:3,8 <b>et</b> 1:5,9 <b>events</b> 9:20 <b>evidence</b> 34:9 <b>examination</b> 3:3 4:13 <b>examined</b> 4:12 <b>except</b> 4:20 <b>exchange</b> 22:24 <b>excluding</b> 1:13 <b>exclusively</b> 31:15 <b>exhibit</b> 3:8 6:16 6:20 23:4,7 <b>exhibits</b> 3:6,11 <b>expands</b> 24:25 <b>expired</b> 13:12 <b>explain</b> 19:14	<b>fayetteville</b> 10:5,7 24:23 27:21 <b>federal</b> 4:19 <b>feel</b> 30:15 32:11 32:19 <b>feelings</b> 21:13 <b>felt</b> 32:18 <b>file</b> 1:6 <b>filed</b> 3:10 23:5 <b>financially</b> 34:13 <b>find</b> 22:6 <b>first</b> 4:11,22 13:20,22 16:14 21:2 25:13 34:10 <b>florida</b> 11:5,6,6 11:7,10,14 12:12,15,16 13:13,23 17:5 <b>flowers</b> 15:2 <b>follow</b> 30:20 32:8,22 <b>follows</b> 4:12 <b>foregoing</b> 34:5 34:7 <b>form</b> 4:20 <b>formal</b> 13:5 25:16 <b>formalities</b> 1:13 <b>former</b> 31:5 <b>frame</b> 10:20	<b>free</b> 32:23 <b>frightened</b> 30:8 <b>full</b> 10:4 16:4 <b>fully</b> 7:24 8:3 <b>fun</b> 14:25
<b>e</b>			<b>g</b>
<b>e</b> 4:1,1 34:2,2 <b>early</b> 18:14 <b>education</b> 12:11 29:14 <b>effect</b> 17:12 <b>elaborate</b> 21:22 <b>elected</b> 31:2,7 31:14 <b>election</b> 4:17 8:8,10,13 17:16 18:2,10 29:2 <b>elections</b> 18:5,7 19:23 28:22 29:8,25 <b>electronic</b> 6:1 <b>elias.law</b> 2:6 <b>email</b> 6:3,6 21:17 22:8 <b>emailed</b> 9:14 <b>emails</b> 21:18 <b>employee</b> 15:11 34:11,12 <b>employment</b> 13:19 29:17 <b>enabled</b> 6:11 <b>english</b> 5:7 <b>entertainment</b> 25:8	<b>f</b> <b>f</b> 34:2 <b>fair</b> 19:22 <b>faith</b> 25:21 26:25 <b>familiar</b> 6:18 6:22 29:7,24 <b>family</b> 8:7,13 <b>far</b> 17:18 27:1 <b>favorite</b> 13:16 <b>fayette</b> 10:10 16:12,16,17,22 17:1 24:24	<b>fayetteville</b> 10:5,7 24:23 27:21 <b>federal</b> 4:19 <b>feel</b> 30:15 32:11 32:19 <b>feelings</b> 21:13 <b>felt</b> 32:18 <b>file</b> 1:6 <b>filed</b> 3:10 23:5 <b>financially</b> 34:13 <b>find</b> 22:6 <b>first</b> 4:11,22 13:20,22 16:14 21:2 25:13 34:10 <b>florida</b> 11:5,6,6 11:7,10,14 12:12,15,16 13:13,23 17:5 <b>flowers</b> 15:2 <b>follow</b> 30:20 32:8,22 <b>follows</b> 4:12 <b>foregoing</b> 34:5 34:7 <b>form</b> 4:20 <b>formal</b> 13:5 25:16 <b>formalities</b> 1:13 <b>former</b> 31:5 <b>frame</b> 10:20	<b>g</b> 4:1 29:12 <b>gainesville</b> 11:15 12:12 <b>gardening</b> 14:25 15:1 25:9 <b>general</b> 18:5 <b>generally</b> 19:22 27:20 28:15 <b>georgia</b> 1:2,9 2:9 10:6,24 11:17 16:9,20 17:17 19:23 22:5,16 23:24 24:2,23,24 25:25 26:10,22 26:25 28:7,11 28:15,21 29:15 29:18,21 30:4 30:25 31:3,6 31:23 32:2,6 32:10 34:3 <b>getting</b> 19:16 20:18 22:22 25:10 <b>girl</b> 15:24 <b>give</b> 5:17 23:3 <b>given</b> 7:2 34:9

[go - know]

Page 5

<b>go</b> 6:9,24 7:12 12:11,23 13:2 18:14 23:2 32:23 <b>goes</b> 12:14 32:17 <b>going</b> 4:20 6:3 8:22 9:3 15:9 19:15 23:2 30:13 <b>good</b> 13:18 <b>government</b> 28:7,11 <b>graduate</b> 12:25 13:2 <b>graduated</b> 13:19 <b>grant</b> 1:5 <b>great</b> 5:4,13 6:9 11:23 32:25 <b>groceries</b> 27:14 <b>group</b> 25:15,16 25:21 28:8,12 <b>groups</b> 20:24 27:6 <b>guess</b> 21:11	<b>head</b> 5:17 <b>health</b> 29:20 <b>hear</b> 5:11,15 29:9 <b>heard</b> 12:11 <b>hearings</b> 24:2 <b>heather</b> 1:14 34:18 <b>held</b> 19:2,5 20:2 <b>help</b> 9:19 <b>herschel</b> 31:13 <b>high</b> 12:23,24 13:15 <b>hired</b> 22:10 <b>history</b> 13:17 13:19 16:9 21:1 <b>home</b> 11:20 12:6 26:3 27:24 <b>homeowner's</b> 25:17 <b>honestly</b> 33:2 <b>hope</b> 22:2,3 <b>hoping</b> 22:1 <b>hours</b> 16:6 <b>huh</b> 5:16,16 14:11 15:5	<b>index</b> 3:1 <b>initially</b> 16:20 19:1 <b>interest</b> 24:8,10 24:18 <b>interested</b> 21:14 34:13 <b>interests</b> 25:6 <b>international</b> 26:15 <b>involved</b> 8:6 20:23 25:13,20 27:9 <b>isn't</b> 16:18 <b>issues</b> 22:13,17 23:20,25,25 <b>it's</b> 5:20,21 10:8 11:12 12:1 18:17 22:15,15 24:20 25:5,8,12 26:2 29:8 32:8 33:2 <b>i'd</b> 27:14 <b>i'll</b> 6:9,24 12:4 23:9,18 27:16 <b>i'm</b> 4:24 5:6 11:6,6,24 12:14,15 16:12 20:15 21:3,18 22:14 23:2,4 24:23,24,24 29:19,23 32:20 <b>i've</b> 14:3,4 18:14 25:20	<b>j</b> <b>jacquelyn</b> 1:12 4:10,16 6:18 10:5 34:9 <b>january</b> 1:15 17:3 34:9,15 <b>job</b> 13:20,22 <b>jobs</b> 14:3,4,4,5 14:8,15 15:13 15:14 <b>join</b> 21:19 <b>jonesboro</b> 26:21,25 27:1 <b>journalism</b> 12:19,20,20 13:3,20 <b>june</b> 12:17 <b>justice</b> 31:5
<b>h</b>	<b>i</b>	<b>k</b>	<b>keep</b> 6:4 7:24 8:2 29:14,17 29:21 <b>kids</b> 15:20,22 <b>kind</b> 7:14 13:5 13:11,18 15:1 20:16,20 22:9 22:12,16,19 25:18 32:8 33:3 <b>kinds</b> 25:7 <b>know</b> 5:11,23 5:24,25 6:3 7:14 12:21 14:22 15:15 16:14,20 17:11
<b>handle</b> 5:1 <b>hanging</b> 20:20 <b>hannah</b> 2:8 5:6 <b>happen</b> 30:13 <b>happened</b> 7:16 <b>hard</b> 22:15 <b>hclapp</b> 2:10	<b>identified</b> 3:8 <b>important</b> 5:20 <b>including</b> 6:2 <b>inclusive</b> 22:4		

[know - needs]

Page 6

17:14,16 18:9 18:13 21:8,9 22:16,19 23:9 23:15 24:8,13 24:14 25:13,19 28:18,21 29:16 30:17,24 31:2 31:5 33:2 <b>knowledge</b> 28:6,10	<b>limits</b> 10:7,8 <b>little</b> 5:21 12:15 13:19 21:22 23:9 <b>live</b> 10:23 24:20 <b>lived</b> 10:11 11:14 17:5 <b>located</b> 18:13 25:24 <b>location</b> 16:23 18:16 27:19,20 <b>lois</b> 1:5 <b>long</b> 7:21 10:11 13:25 14:5,7 25:11 26:5,24 <b>look</b> 9:8,13 <b>looked</b> 9:9,16 17:21 <b>looking</b> 23:10 <b>lot</b> 15:9 20:19 21:17 <b>loud</b> 5:15 <b>loudly</b> 5:15	<b>management</b> 14:15 <b>march</b> 23:5 <b>margin</b> 31:15 <b>marked</b> 3:7 23:4 <b>marketing</b> 13:22 14:4 15:13 21:11 <b>marking</b> 6:16 <b>martin</b> 12:24 <b>matter</b> 5:8 7:1 <b>ma'am</b> 6:22 16:14 24:11 26:20 29:12 32:8 <b>mean</b> 16:12 32:15 <b>means</b> 24:9 <b>meat</b> 7:1 <b>media</b> 6:6 <b>medical</b> 8:2 <b>medications</b> 7:23 <b>meeting</b> 9:14 22:9 <b>meetings</b> 24:5 <b>member</b> 8:8,13 18:23 19:19 20:2 25:21 <b>members</b> 4:17 28:7,11 <b>memos</b> 9:25 <b>mentioned</b> 5:14 30:19	<b>merger</b> 15:10 <b>merits</b> 21:21 <b>messaging</b> 6:6 <b>mile</b> 18:17 <b>miles</b> 26:4 27:2 <b>minority</b> 28:7 28:12 31:22 32:1,5,10 <b>missing</b> 17:18 17:23 <b>months</b> 14:1 <b>mosque</b> 26:1 <b>mother</b> 12:14 <b>mountain</b> 10:24 <b>move</b> 11:17 15:19 <b>moved</b> 11:15 11:15 14:3 16:19,19 17:4 <b>moving</b> 10:22 16:19 21:1 <b>mrutahindurwa</b> 2:6
<b>l</b>	<b>m</b>	<b>n</b>	<b>n</b>
<b>l</b> 26:17 29:12 <b>lack</b> 29:14,17 29:20 <b>landscaping</b> 15:2 <b>lawsuit</b> 9:9,10 21:2 22:1,22 22:25 <b>lawsuits</b> 8:7 <b>lawyer</b> 8:23 9:1 <b>leadership</b> 19:2 <b>learn</b> 21:2,4 <b>leave</b> 15:7,14 <b>led</b> 28:24 <b>left</b> 15:6 <b>legal</b> 24:12 <b>legislator</b> 23:19 <b>legislature</b> 24:2 <b>let's</b> 12:11 14:19 <b>license</b> 34:19 <b>licenses</b> 13:7 <b>liked</b> 12:21	<b>made</b> 8:12 9:13 11:17 12:20 21:19 <b>major</b> 31:19 <b>majority</b> 28:21 28:24 <b>make</b> 25:14 30:8,15 <b>makeba</b> 2:3 32:21	<b>meeting</b> 9:14 22:9 <b>meetings</b> 24:5 <b>member</b> 8:8,13 18:23 19:19 20:2 25:21 <b>members</b> 4:17 28:7,11 <b>memos</b> 9:25 <b>mentioned</b> 5:14 30:19	<b>n</b> 4:1 29:12 <b>name</b> 4:24 5:6 10:4 26:11,12 26:14 27:19 <b>need</b> 5:23,24 6:4 12:22 32:20 <b>needs</b> 31:22 32:1,5,7,9,12 32:18,20



**[neighborhood - prepare]**

Page 7

<b>neighborhood</b> 25:1,6,9,9 <b>news</b> 22:16 <b>nice</b> 15:4 <b>nodding</b> 5:17 <b>nonpolitical</b> 25:6 <b>northern</b> 1:2 <b>notes</b> 9:23,25 <b>notice</b> 3:9 6:14 6:17 <b>november</b> 18:10 <b>nw</b> 2:3	16:8,17,23 17:14,20,24 18:9,12,16,22 19:14 20:7 21:10 22:6,9 22:15 23:12,18 24:22 25:7,20 25:21 26:18,23 27:1,3,3,15 29:14 33:4 <b>older</b> 16:1 <b>ongoing</b> 25:12 25:13 <b>open</b> 6:4,6 <b>opened</b> 9:15 <b>opinion</b> 28:15 29:14,21 31:23 32:2 <b>opportunities</b> 29:17 <b>opposed</b> 5:16 5:17 <b>organization</b> 25:22 <b>ossoff</b> 29:3 <b>outcome</b> 34:14 <b>outside</b> 10:8 27:22	25:25 26:10,24 27:4 <b>parkwood</b> 2:8 <b>part</b> 11:6 21:14 25:11 26:5 <b>partial</b> 12:15 <b>participate</b> 19:15 22:22 27:7 <b>participated</b> 19:8 25:1 <b>participating</b> 7:24 8:3 28:3 29:15,18,21 <b>participation</b> 22:25 28:8,12 <b>particular</b> 32:5 32:7,9 <b>parties</b> 4:5 31:19 34:12,13 <b>party</b> 18:23 19:3,6,9,20 20:3 <b>past</b> 25:9 <b>people</b> 19:16 20:19 21:12 22:5 24:20 29:15,18,21 30:9,14,24 31:2,20 32:19 <b>perfect</b> 6:24 23:12 <b>period</b> 10:25 11:13 14:18	<b>personal</b> 28:6 28:10 <b>personally</b> 28:18 30:4 <b>pertaining</b> 23:25 24:3 <b>phone</b> 6:2,5 20:18 21:5,5 <b>physical</b> 18:16 <b>place</b> 21:24 27:6 <b>plaintiff</b> 2:2 <b>plaintiffs</b> 1:6 <b>planting</b> 15:2 <b>please</b> 5:14,21 5:23 10:3 <b>political</b> 18:22 20:3,5 28:4 31:19 <b>politics</b> 29:15 29:18,22 <b>position</b> 19:5 20:2 31:6 <b>positions</b> 19:2 <b>pr</b> 14:16 <b>precinct</b> 18:9 18:13 <b>precinct's</b> 18:16 <b>preliminary</b> 6:25 <b>preparation</b> 9:14 <b>prepare</b> 9:5
<b>o</b>	<b>opened</b> 9:15 <b>opinion</b> 28:15 29:14,21 31:23 32:2 <b>opportunities</b> 29:17 <b>opposed</b> 5:16 5:17 <b>organization</b> 25:22 <b>ossoff</b> 29:3 <b>outcome</b> 34:14 <b>outside</b> 10:8 27:22		
<b>o</b> 4:1 26:17 <b>o.c.g.a.</b> 4:4 <b>obama</b> 20:9 <b>obama's</b> 20:16 <b>objection</b> 24:12 <b>objections</b> 4:20 <b>october</b> 10:13 <b>offer</b> 15:10 <b>office</b> 16:16 18:15 30:24 31:3,19 <b>official</b> 1:8 <b>oh</b> 27:3,15 <b>okay</b> 4:25 5:4 6:9,11,16,24 7:9,18,21,23 9:13,19 10:3,9 11:9,11,17,19 12:4,9 14:7,24 15:12,18 16:3	<b>p</b> <b>p</b> 4:1 <b>page</b> 3:2,7 <b>pages</b> 34:8 <b>paid</b> 22:22 <b>park</b> 10:19,23 11:1 16:17		

[president - right]

Page 8

<b>president</b> 20:8 20:16 <b>presidential</b> 18:3 20:8 <b>primaries</b> 18:3 <b>primary</b> 31:15 <b>print</b> 34:7 <b>prior</b> 8:6,12 10:21,22 11:1 16:22 18:13 26:21 <b>probably</b> 10:21 11:1 17:22 20:19 21:3 <b>procedure</b> 4:19 <b>process</b> 28:4,8 28:13 29:8,10 <b>prohibited</b> 27:25 28:3 <b>public</b> 13:12,23 31:3 <b>purpose</b> 4:18 5:9 <b>purposes</b> 4:18 23:4 <b>pursuant</b> 1:12	<b>r</b> <b>r</b> 4:1 26:17 34:2 <b>race</b> 28:1,4 <b>racial</b> 29:24 30:1,5,17 <b>raffensperger</b> 1:8 4:17 <b>raised</b> 23:20 <b>reach</b> 23:19 <b>read</b> 22:14 23:12 <b>reading</b> 1:14 <b>really</b> 12:21 21:3 <b>recall</b> 7:15 17:18,24 20:1 <b>receiving</b> 22:24 <b>recent</b> 17:12 <b>recollection</b> 9:20 <b>record</b> 10:3 17:21 <b>redistricting</b> 17:12 21:24 23:25 24:3,6 <b>reduced</b> 34:7 <b>referring</b> 9:10 <b>refresh</b> 9:19 <b>regarding</b> 8:8,9 <b>register</b> 17:1 19:16 <b>registered</b> 16:9 16:11,12,13,18 16:20 17:5,8 19:1	<b>registering</b> 28:1 <b>registrar's</b> 18:15 <b>registration</b> 16:8,16,19 19:11 <b>regularly</b> 27:4 <b>relate</b> 10:1 <b>related</b> 7:6 8:8 8:10,13,13 28:8,12 <b>relates</b> 24:18 <b>relations</b> 13:12 13:24 <b>relative</b> 34:10 34:12 <b>relentless</b> 5:25 <b>remember</b> 7:16 7:18,21 16:11 16:23 17:18 21:6,10 26:11 26:12 <b>remote</b> 4:6 <b>repeat</b> 28:9 31:25 <b>reporter</b> 4:3 5:13 6:11 34:18 <b>represent</b> 5:7 22:5 30:16 34:8 <b>represented</b> 31:20	<b>republican</b> 19:20,25 28:19 30:21 31:14,15 31:16 <b>requirement</b> 28:22,24 <b>requirements</b> 4:4 <b>research</b> 22:12 22:16 <b>reserve</b> 5:3 <b>reserved</b> 4:21 <b>reside</b> 10:17 <b>resided</b> 11:2 17:11 <b>residents</b> 31:24 32:3 <b>responsiveness</b> 4:21 <b>resulted</b> 29:2 <b>resuming</b> 5:5 6:13 24:16 <b>retail</b> 14:4 15:13 <b>retire</b> 15:8,10 15:11 <b>retired</b> 14:12 14:19,21 15:6 15:8,8 <b>review</b> 6:20 9:5 23:7 <b>right</b> 8:6,22 9:3 10:3,14 12:11 12:22 13:2,18 14:22 15:6
<b>q</b>			
<b>question</b> 4:20 5:10,22 30:20 32:8,9,17 <b>questioning</b> 5:25 <b>questions</b> 6:25 21:12 32:22,24 33:1 34:6			

[right - taught]

Page 9

16:8 17:1,3 18:2,19 20:23 21:1,23 22:2 23:2,19,24 24:17 27:22,25 28:21 29:5 31:22 32:17,21 <b>room</b> 12:9 <b>rules</b> 4:19 <b>run</b> 30:24 <b>running</b> 31:14 <b>runoff</b> 18:19,20 28:25 <b>rutahinderwa</b> 2:3 4:24,25 5:3 24:12 32:24	<b>seen</b> 9:17 23:6 23:10 30:4,21 <b>senate</b> 17:13 31:11,18 <b>senator</b> 29:2,3 31:9 <b>served</b> 19:5 <b>services</b> 27:4 29:20 <b>session</b> 23:20 23:22 <b>seventh</b> 2:3 <b>share</b> 6:9 23:2 <b>sharing</b> 6:24 23:18 <b>shopping</b> 27:12 27:16 <b>showing</b> 23:4 <b>shrubs</b> 15:2 <b>sic</b> 10:11,17 11:21 <b>signature</b> 5:2,3 34:17 <b>signed</b> 16:14 <b>signing</b> 1:14 <b>similar</b> 30:21 <b>skins</b> 30:14 <b>slating</b> 29:7,10 29:11 <b>social</b> 6:6 <b>socializing</b> 25:10 <b>son</b> 16:2 <b>sorry</b> 4:24 8:7 11:6,24 12:14	27:16 <b>sounds</b> 15:4 <b>south</b> 18:18 <b>southeast</b> 11:12 <b>southside</b> 18:17 <b>speak</b> 5:14,20 <b>speaking</b> 6:21 <b>special</b> 18:7 23:20,22 <b>specific</b> 27:17 30:11 <b>specifically</b> 30:18 <b>specifics</b> 8:22 <b>spell</b> 26:16 <b>spend</b> 27:23 <b>standpoint</b> 14:16 <b>started</b> 32:13 <b>state</b> 1:9 4:16 4:17 10:4 11:2 12:15 13:13 21:20 24:24 34:3 <b>stated</b> 34:6 <b>states</b> 1:1 11:4 31:10,18 <b>statewide</b> 31:10 31:19 <b>staying</b> 15:16 <b>stipulations</b> 1:13 4:23 <b>stone</b> 10:24 <b>stop</b> 6:24 23:18	<b>store</b> 27:19 <b>stuart</b> 11:8,9 11:10,14 <b>studied</b> 13:3 <b>study</b> 12:18,20 <b>subject</b> 12:21 <b>subjects</b> 13:15 <b>suite</b> 2:4,9 <b>support</b> 19:22 20:13 <b>supported</b> 29:5 <b>supporting</b> 15:16 <b>supreme</b> 31:6 <b>sure</b> 5:15 20:15 21:3,18 25:14 25:17 28:10 29:19,23 32:1 <b>survey</b> 21:12 <b>swearing</b> 4:6 <b>sworn</b> 4:8,12 34:10 <b>synagogue</b> 26:1
s			t
s 4:1 29:12 <b>saw</b> 9:15 <b>saying</b> 32:20 <b>scare</b> 30:14 <b>school</b> 11:15 12:23,24 13:2 13:15 27:9 <b>scj</b> 1:6 <b>screen</b> 6:10,20 23:2,7 <b>scroll</b> 23:9 <b>se</b> 2:8 <b>seattle</b> 2:5 <b>second</b> 23:3 <b>secretary</b> 1:9 4:16 21:19 <b>see</b> 6:14 7:21 14:19			<b>t</b> 29:12 34:2,2 <b>take</b> 6:17 13:23 15:10 22:3 <b>taken</b> 1:12,15 4:7,16 7:23 21:24 34:6 <b>talk</b> 30:12 <b>talking</b> 24:15 25:15 27:18 <b>taught</b> 13:15

[taylor - williams]

Page 10

<b>taylor</b> 5:7 <b>taylorenchish...</b> 2:10 <b>teach</b> 13:14 <b>teaching</b> 13:13 <b>teleconference</b> 1:16 <b>tell</b> 14:19 <b>term</b> 24:8 29:7 29:24 <b>testify</b> 9:20 23:24 <b>testifying</b> 11:19 <b>testimony</b> 7:2 7:10 <b>text</b> 6:6 <b>thank</b> 5:1,4,13 6:9,12 11:23 12:4 32:25 33:4 <b>that's</b> 4:25 7:21 12:22 13:18 20:19 21:24 29:4 32:21 <b>they'll</b> 22:3 <b>they're</b> 25:5 <b>thing</b> 21:23 22:3 32:20 33:3 <b>things</b> 19:11 21:13 25:7 30:9,10,11,14 32:11,13,15 <b>think</b> 5:14 19:11 32:15,21	<b>thoroughly</b> 33:1 <b>three</b> 11:1 26:6 <b>ticket</b> 31:14 <b>time</b> 5:20,23 7:9,22 10:20 10:25 11:13 14:17 16:4,24 16:25 27:23 32:25 33:2 <b>today</b> 7:2,23 9:21,23 11:19 32:25 33:3 <b>today's</b> 7:24 8:3 9:5 <b>together</b> 25:10 <b>told</b> 21:10 28:18 <b>took</b> 17:12 <b>touched</b> 13:18 <b>tough</b> 20:19 <b>training</b> 13:5 <b>transcript</b> 34:8 <b>treatment</b> 30:21 <b>trial</b> 4:22 7:3 7:12 <b>true</b> 34:8 <b>truthfully</b> 7:24 8:3 <b>try</b> 5:16 27:16 <b>turn</b> 12:4 <b>tv</b> 6:3 <b>two</b> 10:21,22 17:23,24	<b>u</b>	31:10 <b>voter</b> 16:8 19:11 20:23 <b>voters</b> 28:15,18 30:8 31:16 <b>voter's</b> 17:21 <b>voting</b> 16:22 18:14
		<b>uh</b> 5:16,16 14:11 15:5 16:21,21 <b>under</b> 4:19 <b>understand</b> 5:10,18 19:10 <b>understanding</b> 25:18 <b>united</b> 1:1 31:10,18 <b>university</b> 12:12,16 <b>use</b> 4:22 <b>used</b> 29:8,25 <b>uses</b> 28:21	<b>w</b>
		<b>v</b>	<b>w</b> 26:17 <b>wait</b> 5:21 <b>waive</b> 4:5 <b>waived</b> 1:13 <b>walker</b> 31:13 <b>want</b> 12:20 <b>wanted</b> 15:15 21:25 <b>warnock</b> 29:2 31:9 <b>washington</b> 2:5 <b>wave</b> 5:24 <b>way</b> 10:1 30:13 30:13 <b>week</b> 16:6 <b>went</b> 14:9 16:13 <b>weren't</b> 15:15 <b>we'll</b> 5:3 6:25 <b>we're</b> 6:16 25:14 <b>white</b> 30:21 31:15,24 32:2 <b>who's</b> 16:1 <b>williams</b> 1:15 5:14 34:18

[wish - zoom]

Page 11

<b>wish</b> 5:1	<b>z</b>
<b>witness</b> 4:6,8 4:11 33:4 34:9	<b>zoom</b> 1:15 4:7 5:21 6:4
<b>work</b> 7:6 11:18 14:9,20 20:16 20:19,20 27:22	
<b>worked</b> 13:23 14:12,15,17 16:3 20:5,8,13	
<b>working</b> 15:12 15:16	
<b>works</b> 14:20 25:17	
<b>world</b> 26:15,17 26:21	
<b>worship</b> 27:6	
<b>wow</b> 14:14	
<b>y</b>	
<b>year</b> 7:18 12:25 14:6,6 15:13 20:14 21:3	
<b>years</b> 7:20 10:21,22 11:1 12:16 14:13,17 17:22 26:6	
<b>young's</b> 20:13 20:21	
<b>you'd</b> 28:24	
<b>you'll</b> 6:4	
<b>you're</b> 21:12 23:9 24:22 25:15 27:1	
<b>you've</b> 6:3 30:19	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

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

(A) to review the transcript or recording; and

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

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

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

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

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).