

# EXHIBIT J

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

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

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

\* \* \*

Remote Videoconference Deposition of  
ANNIE LOIS GRANT

December 14, 2022

4:27 p.m.

By Marcia Arberman, CCR B-1059

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1 located, giving your deposition today?

2 A Yes.

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

5 A No, no.

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

9 A Yes.

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

11 A Yes.

12 Q How long have you lived at that address?

13 A Ooh. 49 years.

14 Q Are you originally from Georgia?

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

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

18 MS. LAROSS: Oh, boy.

19 THE WITNESS: Yeah, it went out.

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

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

24 (Off the record.)

25 (The record was read.)

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

3 A In Fulton County.

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

6 A I am.

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

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

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

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

16 BY MS. LAROSS:

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

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

21 A Yes, yes.

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

24 A House District 124.

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

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

3 BY MS. LAROSS:

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

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

9 A Yes.

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

12 A Yes.

13 Q Have you ever voted in any other state?

14 A No.

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

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

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

22 A I do.

23 Q And since when have you been a member?

24 A Since the first time I registered.

25 Q And have you held any leadership positions

1 in the Democratic Party?

2 A Yes.

3 Q And what are those, ma'am?

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

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

9 A I'm thinking 11 years.

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

13 A I was elected a state committee member.

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

17 A No.

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

20 A As a state committee member, yes.

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

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

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

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

3                   A       He was white.

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

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

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

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

12                  A       He did.

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

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

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

20                  A       No.

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

22                  A       No.

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

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

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

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

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

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

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

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

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



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

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

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

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

14          THE REPORTER: Okay.

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

17          THE REPORTER: Okay. Thank you.

18       BY MS. LAROSS:

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

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

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

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

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

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

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

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

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

3 A Yes. We do it too for them.

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

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

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

13 A Repeat that.

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

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

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

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

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