

EXHIBIT S

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.

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.