

EXHIBIT P

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

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

4 ANNIE LOIS GRANT; QUENTIN T.
5 HOWELL; ELROY TOLBERT; THERON
6 BROWN; TRIANA ARNOLD JAMES; EUNICE
7 SYKES; ELBERT SOLOMON; DEXTER
8 WIMBISH; GARRETT REYNOLDS;
9 JACQUELINE FAYE ARBUTHNOT;
10 JACQUELINE BUSH; and
11 MARY NELL CONNER,
12 Plaintiffs,

CIVIL ACTION FILE

vs.

NO. 1:22-CV-00122-SCJ

13 BRAD RAFFENSPERGER, in his official
14 capacity as the Georgia Secretary
15 of State; WILLIAM S. DUFFY, JR.,
16 in his official capacity as chair
17 of the State Election Board;
18 MATTHEW MASHBURN, in his official
19 capacity as a member of the State
20 Election Board; EDWARD LINDSEY,
21 in his official capacity as a
22 member of the State Election Board;
23 and JANICE W. JOHNSTON, in her
24 official capacity as a member of
25 the State Election Board,
 Defendants.

 TAKEN BY REMOTE VIDEO-CONFERENCE
 DEPOSITION OF DEXTER WIMBISH
 December 6, 2022, 9:31 a.m.

Carolyn J. Smith, CCR, RPR, RMR, CCR-A-1361

1 A No.

2 Q Okay. Are you currently involved in any
3 political or activist organizations?

4 A Democratic Party of Spalding County.

5 Q Okay. And in what capacity do you serve
6 in the Democratic Party of Spalding County?

7 A Member.

8 Q And help me, uh, sort of understand what
9 being a member entails.

10 Is it similar to being a member of just
11 the Georgia Democratic Party or the National
12 Democratic Party? Or are there -- are there more,
13 um, activities in the -- in Spalding County?

14 A It means I gave them \$25, and I attend
15 Democratic meetings.

16 Q Got you. Thank you. And, um, we can just
17 go ahead and move on to your employment history.

18 Um, where do you currently work?

19 A I have -- um, I'm employed, self-employed
20 as a sole proprietor. Practice areas include
21 criminal law, personal injury, and general
22 litigation.

23 I am an adjunct professor for Mercer
24 University. I teach business ethics, uh, and
25 employment law. I've been there from 2013 to

1 A Uh, traffic tickets, minor possession
2 charges, and city ordinances.

3 Q And how many hours a week would you say
4 you devote to that job?

5 A Uh, four hours a month.

6 Q Four hours a month? Okay. Have you run
7 for any political office before?

8 A In 2021, I ran for the district attorney
9 for the Griffin Judicial Circuit, as a Democrat.

10 Q Okay, (nodded head affirmatively.) Did
11 you -- is there a primary process for that, or is it
12 a kind of -- a large pool regardless of party?

13 A It was a special runoff. Uh, it was a
14 special runoff that was held because the governor of
15 Georgia appointed the district attorney after the
16 previous district attorney, uh, moved up to a
17 Superior Court position.

18 Uh, it was a special -- it was a special
19 runoff that was mandated because of the Gonzales
20 decision in Athens-Clarke County where the governor
21 attempted to appoint a district attorney there
22 beyond, uh, the term, and the Supreme Court declared
23 that law to be unconstitutional.

24 Therefore, when our district attorney here
25 moved up to a Superior Court judge, a special

1 election was held. I decided to run because I did
2 not want the person who he had already appointed to
3 district attorney to run unopposed, because I feel
4 like every American has the right to participate in
5 the political process, and that district attorneys
6 are elected. And therefore we should have a choice
7 in an election.

8 Q Okay. Um, so it was -- in that election
9 was it just you and the other candidate who was --
10 let me just ask that way.

11 Was it just you and the other candidate?

12 A Republican incumbent was, (inaudible,
13 cutting out) --

14 THE COURT REPORTER: I'm sorry, can you
15 repeat your response, sir? I couldn't hear you.

16 A It was the Republican incumbent, Marie
17 Broder, B-R-O-D-E-R.

18 BY MR. JACOUTOT:

19 Q Thank you. And what -- what was the
20 result of that election?

21 A I got beat badly.

22 Q Okay. Any other political offices that
23 you've run for?

24 A No.

25 Q Have you served -- apart from the, uh,

1 and Republicans have two very distinct ideologies.
2 The ideologies -- ideologies of Democrats are more
3 in line, I believe, with most African-Americans and
4 other minorities because the Democrats promote
5 exclusion [sic], while Republicans promote
6 exclusion.

7 Q Okay. I'll move on to your voter
8 registration and history.

9 Um, are you registered to vote in Georgia?
10 Sounds like a silly question, but I do have to ask
11 you.

12 A I have been registered to vote since 1987.
13 Um, and in that time, that vote was -- our
14 registration was automatic. Uh, as I graduated --
15 when I turned high school -- turned 18 and graduated
16 high school.

17 And so I registered in 1987. I've voted
18 in every presidential election since that time. I
19 may missed one or two local elections, but I never
20 missed a presidential election.

21 Q Okay. And you -- you said you registered,
22 uh, sort of straight out of high school.

23 Was it, uh, through something that was
24 done -- it was automatic, but was -- was there any
25 voter fair that you had to attend, or was it your

1 when I came back in 1994.

2 Q And you -- you said you voted in every
3 presidential election for sure.

4 Uh, are you registered at your current
5 address, the -- the Spalding --

6 A 420.

7 Q -- County -- yeah.

8 A Yes.

9 Q Okay. Uh, what district -- actually,
10 before we get to that, hold on one second. I'll
11 save that question. You mentioned you voted in the
12 presidential elections basically since you've -- you
13 were originally registered.

14 Did you also vote in the primaries of
15 those elections?

16 A Yes.

17 Q What about the off year uh, gubernatorial
18 year elections?

19 A Yes, I voted in every gubernatorial race.

20 Q Okay. What precinct did you vote in for
21 the November 2022 election?

22 A I voted here at my precinct at the UGA
23 campus. I'm not sure of the precinct number.

24 Q Okay. That's -- that's fine. Have you
25 voted in, uh, this -- this current runoff?