

EXHIBIT O

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

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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

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 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 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