

EXHIBIT Q

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
5 CIVIL ACTION NUMBER: 1:22-CV-00122-SCJ

6 ANNIE LOIS GRANT; et al.,

7 Plaintiff(s),

8 vs.

9 BRAD RAFFENSPERGER, in his
10 official capacity as the Georgia
11 Secretary of State, et al.,

12 Defendant(s).

13
14
15 DEPOSITION TESTIMONY OF:

16 GARRETT REYNOLDS

17 January 25, 2023

18 3 p.m. Eastern Time

19 VIA REMOTE VIDEO-CONFERENCE
20
21
22

23 COURT REPORTER:

24 Angela Smith McGalliard,

25 RPR, CRR, CCR

1 Q. Okay. Shifting gears, again, Mr.
2 Reynolds, can you please state your full
3 name for the Record?

4 A. Garrett Reynolds.

5 Q. What is your current address, Mr.
6 Reynolds?

7 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED] Tyrone,
8 Georgia [REDACTED]

9 Q. What county is that in?

10 A. Fayette.

11 Q. And how long have you lived at
12 that address?

13 A. Little more than ten years.

14 Q. And have you lived anywhere else
15 in the past two years?

16 A. No.

17 Q. And where did you live before
18 moving to your current address?

19 A. [REDACTED] [REDACTED] [REDACTED] -- I cannot
20 recall if it was a [REDACTED] [REDACTED] [REDACTED]
21 Atlanta, Georgia [REDACTED]

22 Q. And how long did you live at that
23 address for, to the best of your
24 recollection?

25 A. Five, six years.

1 discussed, have you received any training
2 in any other area?

3 A. No.

4 Q. Now I'll shift along to talk
5 about organizations that you're currently
6 involved in. Are you currently a member of
7 any social organizations?

8 A. No.

9 Q. How about, are you currently a
10 member of any political organizations?

11 A. Yes.

12 Q. And what are those?

13 A. Fayette County Democratic
14 Committee.

15 Q. And how long have you been a
16 member of the Fayette County Democratic
17 Committee?

18 A. I joined when Donald Trump became
19 president, so that would be six years.

20 Q. So around 2016, 2017, then?

21 A. I believe he was elected -- I
22 believe he took office in 2017.

23 Q. Yeah.

24 A. And so that would be five, five
25 and a half years, six years.

1 are in a little bit greater detail?

2 A. Our organization's goal is to
3 locate and elect democrats to public
4 office.

5 Q. And since joining that committee,
6 has that always been your role or have you
7 held different roles within that
8 organization?

9 A. I have had different roles in
10 that organization.

11 Q. And what are those different
12 roles?

13 A. I was the former vice chair of --
14 we call it FCDC, Fayette County Democratic
15 Committee. I have also been a chair of the
16 field operations department.

17 Q. And, again, consistent with your
18 counsel's objection, and taking into
19 account the prior activities that you
20 identified in your present role, are there
21 any other -- Strike that.

22 Were there any other
23 responsibilities that you had in those
24 prior roles, that were publicly available,
25 that we haven't already discussed?

1 states in addition to Georgia, those were
2 Florida, California, and New York; is that
3 correct?

4 A. Yes.

5 Q. And do you recall what city you
6 voted in in Florida?

7 A. Key West.

8 Q. And that was the only one? Were
9 there any others in Florida?

10 A. That was the only one.

11 Q. And then same question for
12 California.

13 A. Alameda.

14 Q. That's the one that's close to
15 Oakland and San Francisco; correct?

16 A. Correct.

17 Q. And then how about for New York?

18 A. Rochester -- Well, Henrietta,
19 definitely and Henrietta only. I turned
20 eighteen in Henrietta.

21 Q. Now, we will shift along to
22 political affiliations. Mr. Reynolds, do
23 you consider yourself to be a member of the
24 Democratic Party?

25 A. Yes.

1 Q. How long have you considered
2 yourself to be a member of the Democratic
3 Party?

4 A. Since the day Donald Trump became
5 president.

6 Q. I'm fairly certain of this
7 answer, based on our prior discussion of
8 organizations you were involved in, but I
9 just want to confirm, that you've held
10 leadership positions in the Democratic
11 Party; is that correct?

12 A. Yes.

13 Q. Those were all the previous
14 positions we discussed earlier; right?

15 A. Yes.

16 Q. And with that -- The committee we
17 discussed earlier, was that the only
18 committee that you have served on with the
19 Democratic Party?

20 A. Yes.

21 Q. Aside from the discussions
22 earlier, and consistent with your counsel's
23 prior objection about only to discuss
24 publicly facing activities, have you
25 participated in any other activities with

1 the Democratic Party, other than those that
2 we've discussed previously?

3 A. No.

4 Q. Have you ever considered yourself
5 to be a member of the Republican Party?

6 A. No.

7 Q. Based on that, is it fair to say
8 that you generally support Democratic
9 candidates for election in Georgia?

10 A. Yes.

11 Q. Have you ever voted for a
12 Republican candidate?

13 A. Yes.

14 Q. And who was that?

15 A. John McCain for president.

16 Q. And I believe that would have
17 been the 2008 presidential election;
18 correct?

19 A. He ran twice. The first time.

20 Q. So that would have been -- So not
21 the time he ran against Barrack Obama, but
22 the time before that; correct?

23 A. Correct.

24 Q. Have you ever been a member or
25 held a position in any other political