

# EXHIBIT V

2/23/2023

Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

Dr. John Alford

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

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COAKLEY PENDERGRASS, et al.,

Plaintiffs,

vs.

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

Defendants.

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Civil Action No.

2:21-CV-05449-SCJ

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ANNIE LOIS GRANT, et al.,

Plaintiffs,

vs.

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

Defendants.

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Civil Action No.

1:22-CV-00122-SCJ

Videotaped deposition of DR. JOHN ALFORD, taken  
remotely in the above-captioned cause, before  
Rachel F. Gard, CSR, RPR, CRR, commencing at  
the hour of 11:00 a.m. Eastern on Thursday,  
February 23, 2023.

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1 Dr. Palmer's expert report?

2 A It certainly -- I think it certainly goes  
3 to some part of my discussion of Dr. Palmer's  
4 report, but I would say it is primarily as a sort  
5 of adjunct to the discussion of primaries in  
6 Dr. Handley's report.

7 Q Okay. So in terms of your analysis of  
8 Dr. Palmer's findings and conclusions, you  
9 primarily relied on the analysis and data that he  
10 himself provided in his report; Is that fair?

11 A So that's correct. But I'm also making  
12 the point that because he has no primary analysis,  
13 we really don't have anything other than the  
14 general election setting to look at. And so I  
15 think that's important to understand what we know  
16 in that setting, although it's not in his report,  
17 we can get that from, you know, sort of  
18 comparable -- for time frame that's comparable  
19 from Dr. Handley's report and my analysis of the  
20 Republican primary, but it's not analysis that's  
21 in my report as sort of checking his analysis,  
22 something like that, because it's not analysis

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1       that he does in his report.

2           Q   Okay.  So earlier you had mentioned that  
3       in preparation for working on this case, you --  
4       I'm not sure if you said, used the verb  
5       "downloaded," but you procured more updated  
6       election data as you -- in preparation for your  
7       work in this case.  Do you recall saying something  
8       to that effect?

9           A   Yes.

10          Q   And then here, though, you specify that  
11       you relied on the election and demographic data  
12       provided by Dr. Palmer and Dr. Handley other than  
13       the 2022 Republican primary data; is that right?

14          A   That's correct.

15          Q   So I guess my question is:  Did you, in  
16       your response to Dr. Palmer's report in  
17       particular, did you utilize any data other than  
18       the data that Dr. Palmer himself relied on  
19       preparing his report?

20          A   No.

21          Q   Okay.

22          A   The purpose of kind of preloading some of

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1 black candidate, they could be elected. So if  
2 blacks prefer to be elected -- or represented by a  
3 black, the Voting Rights Act provided a mechanism  
4 so that can happen rather than that choice always  
5 being blocked.

6           Somebody someplace said this, that blacks  
7 can have any candidates they want, as long as that  
8 candidate was white. That was true throughout the  
9 south, right. You could have any candidate you  
10 wanted as black voters as long as the candidate  
11 was white.

12           That's what we're trying to address here,  
13 provide an equal footing in which if black voters  
14 prefer a black candidate, they can elect that  
15 candidate rather than just electing a white  
16 candidate. So I just think that's a fundamental  
17 question.

18           And what this data shows is that, it is  
19 the case that black candidates that are supported  
20 by black voters face exactly the same or produce  
21 exactly the same voting pattern as do white  
22 candidates favored by black voters. And so that's