

EXHIBIT L

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

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

4 ANNIE LOIS GRANT, et al.,

5 Plaintiffs,

6 vs.

CIVIL ACTION FILE

NO. 1:22-CV-00122-SCJ

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

11 Defendants.

12 DEPOSITION OF ELROY TOLBERT

13 Taken by Remote Conference

14 February 9, 2023

15 9:04 a.m.

16 Valerie N. Almand, RPR, CRR, CRC
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1 employment history all in one.

2 A. Good.

3 Q. All right. On to your voter registration
4 history. Are you registered to vote in Georgia?

5 A. Yes, I am.

6 Q. Do you remember where you registered to
7 vote?

8 A. In Bibb County.

9 Q. Okay. When did you register?

10 A. In '88.

11 Q. Okay. Have you ever registered anywhere
12 else?

13 A. No, I haven't.

14 Q. Are you registered to vote at your
15 current address?

16 A. Yes, I am.

17 Q. And do you know what district you resided
18 in before the recent redistricting took effect?

19 A. I can't remember right off of my head.
20 144, something like that.

21 Q. I think most people don't really know the
22 district numbers off the top of their heads. It's
23 something we can look into.

24 A. All right.

25 Q. Have you voted in each election since

1 A. Do I know where I voted for the runoff?

2 Q. Yeah, where you voted for the runoff.

3 A. Where I voted?

4 Q. Yes, sir.

5 A. Like I said, one of those churches.

6 Mabel White, or either that other church since I
7 moved out here.

8 Q. Okay. And I know you said you've only
9 lived in Georgia, but have you ever voted in any
10 other state?

11 A. No.

12 Q. Okay. Do you consider yourself to be a
13 member of the Democratic party?

14 A. Yes, I am.

15 Q. And since when?

16 A. Since I started voting.

17 Q. And have you held any leadership position
18 in that party?

19 A. No, I haven't.

20 Q. Have you ever held any position or served
21 on any committee of the Democratic party?

22 A. No, I haven't.

23 Q. Have you participated in any activities
24 of the Democratic party?

25 A. Once.

1 Q. What would that have been?

2 A. I helped -- I tried to help register
3 voters.

4 Q. And when was that?

5 A. That had to be about at least 12 years
6 ago.

7 Q. Okay. Have you ever considered yourself
8 to be a member of the Republican party?

9 A. No.

10 Q. Is it fair to say you generally support
11 Democratic candidates for election in Georgia?

12 A. I do.

13 Q. Have you ever voted for a Republican
14 candidate?

15 A. Yes, I have.

16 Q. Do you remember who and when?

17 A. Yes, it was a governor election, it
18 was -- my mind just went blank then. Governor
19 Purdue.

20 Q. Okay. Do you remember what year that
21 was?

22 A. It was in the nineties.

23 Q. Okay. Have you ever been a member or
24 held a position in any other political party?

25 A. No, I haven't.