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

GEORGIA STATE CONFERENCE OF THE)
NAACP, et al.,) Case No.
Plaintiffs,) 1:21-CV-5338-
v.) ELB-SCJ-SDG
STATE OF GEORGIA, et al.)
)
Defendants.)

_____

COMMON CAUSE, et al.,)
Plaintiffs,) Case No.
v.) 1:22-CV-00090-
BRAD RAFFENSPERGER) ELB-SCJ-SDG
Defendant.)

_____

The DEPOSITION of:
CYNTHIA BATTLES
Being taken pursuant to stipulations herein:
Before Kathryn Taylor, CCR
FRIDAY, JANUARY 13, 2023
Commencing at 11:25 a.m.
All parties, including the court reporter, appeared by videoconference.

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Also Present: Helen Butler

I N D E X

DEPONENT PAGE
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* * *

A T T A C H M E N T S

Certificate
Reporter's Disclosure Statement
Errata Sheet

* * *

T R A N S C R I P T C O D E S:

--	interruption/change in thought
. . .	incomplete thought
[sic]	denotes word/phrase that may seem strange or incorrect has been written verbatim
(ph)	phonetically spelled
(indiscernible)	not capable of being understood

I N D E X TO E X H I B I T S

EXHIBITS	DESCRIPTION	PAGE
DEFENDANTS'		
Exhibit No. 1	Notice of deposition	14
Exhibit No. 10	E-mail	29

(Originally marked exhibits attached to the original of the deposition and a copy attached to all copies produced.)

P R O C E E D I N G S

11:25 a.m.

(Whereupon, the court reporter complied with the requirements of O.C.G.A. Section 9-11-28(d).)

(Witness sworn.)

Whereupon,

CYNTHIA BATTLES,

was called as a witness herein and, having first been duly sworn, was deposed and testified as follows:

EXAMINATION

BY MR. TYSON:

Q. All right. Well, good morning, Ms. Battles. It's good to see you again. I hope you're doing well. I'm going to do just for you -- I know you've heard kind of all the different conversations happen so far, but what I'm planning to do is just drill down on a few specific points for the topics for you.

But, again, this will be a deposition on behalf of the coalition for the Peoples' Agenda. And you understand today, you're testifying on behalf of the organization for the topics for which you've been identified, right?

A. Yes, sir.

Q. Okay. So I'm going to do the same kind of just background questions for you, just an overview,

and then we'll do the two topics and be set.

So if you could give me your full name for the record, please.

A. Cynthia Ann Battles.

Q. And, Ms. Battles, you're a resident of which county in Georgia?

A. Fulton.

Q. And I'll ask you the same questions. Again, please don't be offended. Do you have any medical condition or any -- on any medication that would keep you from fully and truthfully participating today?

A. No, I am not.

Q. And have you ever been arrested for a felony?

A. No, not for a felony.

Q. Okay. And I'm assuming you have never been convicted of a felony before, right?

A. No. I'm sorry, I thought I was about to have to admit to being arrested twice in 2021 for (indiscernible).

Q. That's all right. All right. So, Ms. Battles, have you testified in a deposition or a trial before?

A. Aside from personal, no.

Q. Okay. Yeah. And that -- I realized I should have asked related to any voting issues. So you have

not testified in a deposition or a trial related to voting practices, right?

A. No.

Q. Okay. So like we did for Ms. Butler, could you just give me a brief overview of your education starting with college?

A. Sure. I have an associate's degree from Dalton State College and I am currently a student at Atlanta Metropolitan College in Atlanta, Georgia.

Q. Okay. And, I'm sorry, you said -- is it Carlton College?

A. Dalton.

Q. Oh, Dalton, I'm sorry. Dalton State, yes. Are you originally from the Dalton area?

A. I'm originally from Chattooga County.

Q. Chattooga County. Okay. I know, I have spent some time in Chattooga County. I know right where it is. My wife grew up in Lindale in Floyd County, just south of Rome, so . . .

So what year did you get your associate's degree?

A. 2000.

Q. Okay. And do you have an estimated date when you're going to complete your current course of study?

A. Never.

Q. Oh, okay.
A. That's -- it should be 2024.
Q. Understood. And what degree are you seeking at Atlanta Metro?
A. Health and human services.
Q. Okay.
A. It's a poli-sci major.
Q. Great. Thank you. And do you currently hold any professional licenses or professional certifications unrelated to kind of various degrees from colleges?
A. I have a -- it's like a volunteer management certificate from Portland State University that I got in 2012.
Q. Okay. Great. And aside from what we just talked about, you don't have any other formal half -- post-high school education, right?
A. No.
Q. Could you give me your employment history? Let's start from when you -- when you had your associate -- when you graduated with your associate's degree. Just an overview of kind of where different places you've worked.
A. From 2012, I was a Head Start teacher. At that point, we moved to Coweta County, and I've worked

for corporations. I worked for a local telephone company and a local construction company. I went back into nonprofit, working for a women's shelter, joined a missions organization known as Operation Mobilization, left there to work for Wellspring Living. And then worked for Atlanta Community Food Bank. From there, I moved into working political campaigns, and then I worked for Common Cause for five years. And then of course, Peoples' Agenda.

Q. Right. So I'm going to try to work backwards from that then. So when did you join the Peoples' Agenda?

A. Full time, it was February of 2020.

Q. Okay. And what was your role when you joined in February of 2020?

A. Director of policy and engagement.

Q. Is that still your position today?

A. Yes, sir, it is.

Q. Okay. And you mentioned that was full time. Had you worked part-time with the Peoples' Agenda before then?

A. So I -- in 2019 -- about April of 2019, I was working part-time for them. I didn't really have a title, but I did voter registration events and managed their social media.

Q. Okay. Yeah. And were you still working for Common Cause when you were working part-time for the Peoples' Agenda?

A. I was.

Q. Okay. And so roughly what dates did you work for Common Cause?

A. I worked from -- for Common Cause from 2015 to 2020.

Q. And did you have --

A. 2021. Sorry.

Q. -- what were your titles? I'm sorry.

A. Program coordinator. Oh, wait. It was a election protection coordinator, I believe, was my first title, and then about a year after I started, it became program coordinator.

Q. Okay. And just at a general level, what were your responsibilities as a program coordinator at Common Cause?

A. I did a lot of voter education events across the state of Georgia. I also helped Lyndon Waller, who was and is working for Peoples' Agenda with the field program for the Election Protection Coalition.

Q. And you mentioned that before that you worked on some political campaigns.

A. Uh-huh.

Q. What campaigns did you work on?
A. So I'm going to tell you maybe three or four. I don't recall all of them. I remember my first campaign was the mayor's campaign. I can't remember his name at all. I worked John Ossoff's campaign when he was running against Karen Handel. Ken Jurden, Becky Evans, Liliana Bakhtiari. That is all I can recall. I'm sorry, I've worked at least eight over, like, several years, but . . .
Q. That's not a problem. Is it correct that for any part of the races you worked on, the candidates you worked for were Democrats?
A. That would be a fair question.
Q. I'm sorry, I didn't quite get the answer. All them except for what?
A. Yes.
Q. Oh, okay. And do you recall roughly what period of time you were working on political campaigns?
A. Also, I need to go back. I started Common Cause in 2016, and so I was working campaigns 2014, 2015, and part of 2016, because I didn't start Common Cause until around August.
Q. Okay. And then how -- when did you work for Atlanta Community Food Bank?
A. That was 2014.

Q. Okay.
A. It was a short-term contract planning there. Sorry, I can't remember the name of the event, but it's their -- it is, it's Hunger Walk.
Q. Okay. And I think 10 years is probably good enough timeline for us to go back. I won't keep testing your memory on that.
So can you give me -- let's kind of fast forward to the present, in your role as director of policy and engagement at the Peoples' Agenda, what generally are the responsibilities that come with that role?
A. So I do a lot of advocating for policies on a municipal, state, and federal level in our areas. I know that someone's already said it, but voting in the elections, criminal justice reform, education, environmental justice, and economic equity. I do voter education events and co-lead the Election Protection Coalition with Lyndon.
Q. Great, thank you. Let's move next to kind of a process for getting ready for the deposition today. And I want to be clear, I'm not asking for anything you talk with your lawyers about, but for conversations that are unrelated to your lawyers, did you review any documents to get ready for your deposition today?

A. I reviewed the complaints, I reviewed the list of like what we're talking about here -- I don't know the legal name for this -- so that I knew like what topics I was responsible for and sort of what that encompassed. I reviewed each one of my testimonies from the special session and reviewed some e-mails that had been sent during that process.

Q. Okay. And did you speak with anybody in the organization specifically to prepare for your testimony today?

A. With the exception of Ms. Helen Butler, no, I did not.

Q. And other than your lawyers and Ms. Butler, have you talked to anybody else about the fact that you're doing a deposition today or your testimony?

A. No, I have not.

BY MR. TYSON:

Q. Okay. So let's take a look --

MR. TYSON: And I apologize, Kate, I'm going to refer to one of the exhibits that's 1 through 9.

(Whereupon, Defendants' Exhibit No. 1 was identified for the record.)

BY MR. TYSON:

Q. Exhibit number 1 is our topic list if you can

1 get that in front of you.
2 A. Okay.
3 Q. And you're being offered as a witness for
4 Topics Number 1 and 11, right?
5 A. Uh-huh. Yes, sir.
6 Q. Okay. So let's start with Topic Number 1,
7 "The Organization's allocation of resources and
8 budgetary decisions from January 1, 2021 through the
9 present that reflect the diversion of funds and
10 resources the Organization alleges it has undertaken in
11 its Complaints."
12 And as we discussed with Ms. Butler, because
13 the Peoples' Agenda is not seeking to establish
14 standing through a financial diversion of resources,
15 I'll just be asking about nonfinancial diversions.
16 So are you the designee for Topic Number 1
17 here?
18 A. Yes, sir.
19 Q. And, again, this just gets formulaic, but did
20 you review any documents or talk to anybody
21 specifically to prepare for your testimony in Topic
22 Number 1?
23 A. No, sir.
24 Q. So I've talked to -- and you've been present
25 for the conversation with Ms. Butler about the

1 different types of activities the Peoples' Agenda is
2 engaged in? And I'm assuming, and I may be wrong about
3 this, but that you have some knowledge of some of the
4 specific things that you undertook during the
5 redistricting process on behalf of the Peoples' Agenda?
6 Am I right about that?
7 A. Yes, sir.
8 Q. So if you could walk me through, what are
9 some of the activities and things you did differently
10 with your time in light of the redistricting plans on
11 behalf of the Peoples' Agenda?
12 A. So you have to understand that when I was
13 hired, one of the specific things that Ms. Helen Butler
14 had asked me to do was expand the work that we did in
15 at least four of those other areas besides voting and
16 elections. Because of the way that the redistricting
17 process worked, I had to take -- I had to change my
18 plan from how much time I planned to spend expanding
19 those areas and working in those areas to focus almost
20 fully on the redistricting process. Ms. Helen and I
21 had several conversations about that because,
22 obviously, it impacted my work performance given I had
23 goals and a strategy.
24 So a few of the things that we did, because
25 we were concerned about the fact that the public did

not have data, including census data or maps, proposed maps to look at, when we got the schedule for the joint committees' town halls, we planned a series of educational town halls that would precede those so that we could talk to citizens who attended and give them sort of an idea of what they could ask for, since they didn't have that information to look at. That was in June and July of 2021. So I spent a significant amount of time traveling and doing that.

And then, during special session, I testified a total of 10 times during that process. So I had -- had this process happen differently, I would not have spent that much time traveling, spent that much time training people. I certainly would not have testified 10 total times during special session.

So there was a significant amount of time and effort that was diverted from getting ready for special session, working on citizen review boards, doing things like educating folks about what a -- what the QBE is, and what an opportunity would change for public schools in Georgia. All of these things that we had planned, I didn't get to do those because of redistricting.

Q. I understood. So I want to kind of drill down a little bit on those. So at the time you were hired by the Peoples' Agenda, was there a conversation

about the fact that redistricting was on the horizon, or was that not part of the initial conversation when you joined the Peoples' Agenda?

A. Oh, absolutely. We knew it was coming. Ms. Helen had already started some of her census work before I -- like town halls and events and making sure that folks knew that they needed to fill out the census before I started.

Q. And so when you mentioned the different tasks that you were brought on to work on -- I think you mentioned there were four things. Was that the Citizens Review Board?

A. Five.

Q. Oh, five. Okay. Can you just walk me through it?

A. Five -- five policy buckets, including voting and elections.

Q. Okay. And what were the five policy buckets?

A. Voting and elections, public education, criminal justice reform, economic equity, environmental justice.

Q. A portfolio for sure.

A. It's a lot.

Q. Yes.

A. We work in partnership and coalition with a

lot of it, so . . .

Q. And so then, essentially, I -- as I understand what you've said, the -- the other four policy buckets had to take second place to voting and election policy bucket because that was all-consuming in 2021; is that correct?

A. That's correct.

Q. Okay. And so what I want to do is kind of break down pre-adoption of the maps, the period before that, and then the period after that. So in the period before, let's start with before the special session. So before the special session was held, you were spending a lot of time on these educational town halls to help people -- people prepare, and then attending and helping, I guess, coordinate testimony for the legislature's town hall meetings; is that right?

A. Yes, sir.

Q. Okay. And were there other activities related to redistricting that you were undertaking before the start of the special session, in addition to the work around the town halls?

A. No, sir, because we didn't have any information before that. I mean, since this data came out in September, and we hadn't seen any proposed maps until right before special session started.

Q. And do you recall a congressional map being released I believe it was in late September?

A. It was like September, yes. But I don't know if you recall or not, they released the maps but getting the (indiscernible) files was a little bit difficult. And while it's nice to have a pretty map to look at, it's really hard to do data if you don't have (indiscernible) files.

Q. Gotcha. And thank you. Yeah, my memory of that time period is a little fuzzy myself.

So let's go next to special session convenes through the end of special session. So I know you said you testified a total of 10 times, and then I'm assuming you were also helping with analysis as maps were being released. Is that fair to say?

A. At that point, I was not helping with the analysis. I was doing testimony prep, so I was preparing my own testimony, making sure that folks knew as much as possible in their districts and could show up to testify. It was very time consuming because committee hearings were scheduled last minute, we got agendas last minute, so a lot of my time was spent mobilizing the public.

Q. Understood. Was that the first special session where you had participated in a special session

on redistricting?
A. Yes, it was.
Q. Okay. When you testified -- I know you said you testified a total of 10 times, were you ever prevented from testifying by the committees?
A. No, I was not.
Q. So you worked through the special session. The special session finishes, and then governor signs the maps at the end of December 2021. Can you walk me through, after December 2021, what activities you were engaged in that were related to the redistricting plans?
A. I'm thinking you're only asking about congressional maps and the state maps, right? You're not -- we're not talking local redistricting?
Q. Oh, yes. That's a -- that's a great clarification, yes. So anything related to the House, Senate, and Congressional plans that you were undertaking, but not local redistricting.
A. So after that, there was a lot of making sure that people knew that their districts had changed, and kind of hoping that they got an idea of what their new districts looked like. We did a lot -- we did -- we did a "meet your new legislator" series, mostly via online so that people could have a chance to learn who

1 their new legislator was, that kind of thing. There
2 was a lot of corrections because afterwards, when we
3 had the primary, people didn't know what their new
4 district was. I had a lot of situations where people
5 were calling me going, Wait. I thought so and so was.
6 And I'm going to be honest, as engaged as I
7 was in the process, I went to go vote and Park Cannon
8 wasn't my representative anymore, so I was a little
9 shocked.
10 So -- so that was kind of the thing with --
11 with the general public. There wasn't a great -- no
12 shade to the Secretary of State, but -- or the
13 governor, but there was not a way that, without our
14 help, that people are being informed, these are your
15 new legislators, this is your new district, that kind
16 of thing. So we spent significant resources on doing
17 that.
18 Q. Okay. And have you been involved in a voter
19 education effort after our -- a decennial redistricting
20 before?
21 A. No.
22 Q. Okay. Are there specific things that the
23 Peoples' Agenda was doing that related to the -- what
24 it says is the illegal nature of the maps in its
25 interactions with voters after December 2021?

A. We were collecting stories. We had a lot of people who were frustrated, especially those who just wanted to testify who felt like their voices weren't heard in the process.

Q. Okay. So a story-collection element was part of that. Were there other activities related to the allegedly illegal nature of the House, Senate, and Congressional maps --

A. Not to my knowledge.

Q. -- that the Peoples' Agenda undertook after December 2021?

A. Not to my knowledge. Or I don't recall. Let me put it that way. I shouldn't say not to my knowledge because that sounds like I don't know, but I would have been there. I'm just going to say I don't recall. Because at this point, we've had three or four sessions and 500 elections since then.

Q. And so it'd be correct to say that the new activities that the Peoples' Agenda undertook after December 2021 related to the allegedly illegal nature of those statewide maps was primarily story collection from voters?

A. Story collection, and, again, we did do voter education because a lot of people didn't understand the decision-making process, which is fair because we

didn't understand the decision-making process. And when we asked the questions, we never got answers about it.

Q. Does the Peoples' Agenda engage in story collection for other tasks it is involved in or was that unique to redistricting?

A. That was fairly unique to redistricting. We have collected stories after elections if there were situations that occurred that we want to bring to the Secretary of State or the State Election Board's attention.

Q. Okay. Ms. Battles, let me move to Topic Number 11 in Exhibit 1, which is the second topic identified about. That's titled, "The Organization's communications with the Georgia General Assembly regarding the laws, policies, and protocols it challenges in this action, from January 1, 2021 to the present."

Do you see that topic?

A. Yes, I do.

Q. And you're the designee for Topic Number 11 for the Peoples' Agenda as well, right?

A. Yes, I am.

Q. And same question again. Did you talk to anybody or review any documents specifically to prepare

for this topic?
A. I reviewed the e-mail that I believe has been sent to you as an exhibit and looked to see if there were any other further e-mails in -- that I still had in my possession.
Q. Okay. And just to clarify, I'm assuming you didn't find any further e-mails in your possession?
A. No, sir. You would definitely have them.
Q. Okay. I figured that was the case, but I have to ask.
So can you talk with me about the Peoples' Agenda's communications with the General Assembly during the special session, so let's start with that section, in 2021?
A. So we've already brought this up again. I've testified 10 times during special session. It was a lot. And then had multiple conversations with elected officials regarding the Unity Maps. There was, at one point in time, conversations with the joint committee because we didn't find the location for the Augusta town hall to be equitable because it was -- it wasn't even in Augusta. It was in Chairman Fleming's district, which is just north and it was just north of where the public transportation cut off.
So we had worked really hard to try and get

that moved to a better location so that people in Augusta could reach it. And then, as you've seen in that e-mail, I had spoken to the committee both about the fact that the only meeting that was held in Metro Atlanta, people were only given two minutes to testify. There were several of the town halls where people were being harassed, as well as some other processes. And then trying to get answers to questions about the process, why certain decisions were being made, who was the consultant they had used was. I mean, those kind of conversations.

Q. So let's kind of break that down a little bit. So you mentioned you had multiple conversations with elected officials about the Unity Maps. Do you recall which elected officials you talked to about the Unity Maps?

A. I unfortunately cannot recall all of them. I know I spoke to Democrats and Republicans, because there was a -- there was at least one Democrat who disliked the maps even more than the Republicans do.

Q. And when you say "disliked the maps," a Democrat disliked the Unity Maps more than the Republicans?

A. Yes.

Q. Okay. Redistricting is always a fascinating

1 process.
2 So can I just ask, I know I asked Ms. Butler
3 this, do you know if the Unity Maps were ever
4 introduced by any legislator as a bill during the
5 special session?
6 A. No, sir. Despite my efforts, they were not.
7 Q. Okay. So they were not introduced during the
8 special session?
9 A. Right.
10 Q. Do you recall legislators having any reasons
11 why they didn't want to introduce the Unity Maps as
12 bills?
13 A. I don't think I ever got a straight answer to
14 that question.
15 Q. As part of your efforts around your
16 testimony, did you speak with Chairman Kennedy and
17 Chairman Rich?
18 A. Yes, I'm sorry. It looked like you had more
19 to ask on that question.
20 Q. All right. Did Chair Rich and Chair Kennedy
21 always take a meeting with you if you requested one
22 or -- I may actually -- let me ask this: Did you ever
23 request a meeting with either Chair Rich or Chair
24 Kennedy?
25 A. I did.

Q. Okay. And did they meet with you?
A. No, they did not.
Q. Did you speak with them during or after a committee meeting then?
A. Yes, I did.
Q. Okay. And did they listen to your comments?
A. I think it -- I think it depends on how you define "listen."
Q. Let me ask this: Did they --
A. They were present while I was making my comments, and they appeared to be listening. How's that?
Q. Okay. That's funny. Thank you. Did the Peoples' Agenda take a public position in support of or opposition to any of the maps that were introduced during this special session?
A. Yes, we did.
Q. Okay. And what was that? What was the public positions?
A. The position was that the majority party was using race as a means to crack-and-pack districts in an unfair manner.
Q. And so I think I'm assuming it's fair to say you opposed the plans that were adopted by the General Assembly for a statewide redistricting, right?

A. Yes.
Q. Did the Peoples' Agenda take a position on the plans introduced by Leader Beverly or Leader Butler?
A. To be completely honest, we did not. But part of that was because -- I don't know if you remember the process or not, but we weren't even aware of the fact that Leader Beverley was going to be presenting her maps until we sat down in the meeting that day. So we did not get as much analysis on -- or we didn't get as much information on their maps as we did the ones that the majority party was presenting.
Q. Okay. So -- and I understand. So the -- but ultimately, the Peoples' Agenda took a position in opposition to the statewide plans that were passed and didn't take a position on the plans introduced by the Democratic leadership, right?
A. Yes. But, again, that was -- that didn't have anything to do with partisanship as much as it was what was moving and what was not and what we had the information for.
(Whereupon, Defendants' Exhibit No. 10 was identified for the record.)
BY MR. TYSON:
Q. Okay. So I know we've referenced your

e-mail. I'm going to mark as Exhibit Number 10, the e-mail that was sent to us yesterday. So if you can get that pulled up.

A. One moment, please. Sorry.

Q. What was that?

A. I'm sorry, I'm having trouble with the iPad. I'm afraid that I'm going to tear his iPad up.

Q. Take your time. If we need to take a break to get it up, that's fine.

A. I have it.

Q. Okay. So what I want to do, Ms. Battles, is just kind of start from the bottom and work our way up. So that would be page 4 at the bottom, or actually the bottom of 3 into 4. And it looks like this e-mail chain begins with an e-mail that you sent to a variety of legislators on June 28th, 2021, at about 9:33 p.m.; is that right?

A. Yes. That was actually to the members of the redistricting committee specifically.

Q. Okay. And then moving up one e-mail from there, it looks like the chair of the committee, Representative Rich, responded to you at 8:35 the next morning --

A. Yes.

Q. -- right?

A. Yes.
Q. Okay. And then moving up a little more you then responded to her and the members of the redistricting committee at about 9:45 that morning; is that right?
A. Yes.
Q. And kind of looking into the substance of your e-mail, you referenced the issue of 60 people being allowed to speak and the need for a waiting list for virtual meetings; is that right?
A. Yes, sir. So what had had happened is the very first town hall was a Zoom meeting. It was supposed to be statewide, but they had cut it off for 60 people. And when that -- and so there were a significant amount of people who were not allowed to sign up, and then when they actually had the hearing, only about 20 of those people showed up to the Zoom meeting. So there was a good number of people who didn't get to speak because of the way that the system had worked.
Q. Okay. And so you let Chair Rich know your concerns about that part of the system, right?
A. Yes. I -- well, and around some of the other issues as well, including the fact that the online portal didn't allow for documents to be uploaded. So

it was harder for the public to include information that they might want to be included in their testimonies --

Q. Okay.

A. -- or their comments, I guess, since it's an online portal.

Q. And so moving up then, Chair Rich responds to you again, I guess about two and a half hours later still on June 29th; is that right?

A. Uh-huh.

Q. And that's a yes?

A. Yes. Yes, sir.

Q. Okay. And Chair Rich thanks you for the information about the sign-up process in her e-mail, right?

A. Yes.

Q. And did the committee make a change to the virtual process for the next virtual hearing in light of the concerns that you raised about people not showing up in a waiting list?

A. There was not a waiting list, but I don't think that there was a 60-person cutoff. The set -- the last online meeting was held on a Saturday morning, and they had significantly less people show up and/or sign up. So I don't -- I don't know if it's because

they heard me, or they looked at the number of sign-ups they had and decided they didn't need the cutoff.

Q. Okay.

A. But I do know that there were no changes made to the online portal for comments, and I wasn't the only person expressing those concerns.

Q. Got it. And, again, just moving up one more e-mail, you sent another e-mail to Chair Rich on June 29th at 6:20 p.m., and then the Chair responds to you the next day at 1:41 p.m., right?

A. Yes.

Q. And the Chair and her e-mail on June 30th at 1:41 p.m. indicates that she's felt similar treatment and how unsettling that feels and how inappropriate that was under the circumstances, right?

A. Yes.

Q. Okay. And I know we've kind of addressed this already, but did -- you didn't have any other written communications beyond the written testimony that you submitted to the portal with any legislators; is that right?

A. No. That's correct.

Q. Ms. Battles, give me just one second. I may be finished with my questions.

One more question: In the testimony that you

gave to the committees at various points, did the Peoples' Agenda ever offer any sort of legal analysis to the committee of what it considered compliance with the Voting Rights Act to be?

MS. BERRY: I would just object to -- as this question calls for privilege. Cindy, you're welcome to answer, but do not disclose anything you learned from counsel or discussed with counsel.

MR. TYSON: And maybe I can clarify that, Crinesha. My only question is for when Ms. Battles was speaking with legislators. So things that she was communicating to legislators, did the Peoples' Agenda communicate any sort of legal analysis to the legislators? Not anything that she learned apart from that.

THE WITNESS: Not legal analysis, no.

BY MR. TYSON:

Q. And when communicating with legislators, did the Peoples' Agenda ever tell legislators what it believed the legal standard should be around compliance with the requirements of the U.S. Constitution?

A. There is testimony where I pointed out that their repeated comments, that they were compliant with the Voting Rights Act, was sort of a low bar given the

nature of Shelby & Brnovich. So -- but that is -- that is a -- I don't know that we would call that a legal analysis given that I'm not a lawyer.

Q. Certainly. All right. Ms. Battles, that's all the questions I have. I don't know if your counsel has any questions, but I really appreciate your time and thank you for bearing with us through the morning here and even via Zoom, so it worked.

A. Thank you, Mr. Tyson. Have a good day.

MS. BERRY: Thank you. I don't have any questions, but I do want to clarify something with you, Bryan. In Exhibit 5, we included on page 11 the link to the Unity Maps. Well, at least that was our intention, but we included a PDF of just one map, so I just wanted to clarify that. The first part of the link georgiaunitymap.org is still live and it contains all of the maps that we submitted.

MR. TYSON: And just -- so then, just so we're clear on the record then, Crinesha, so then when I -- on Exhibit 6, that georgiaunitymaps.org, and the links there, I guess, on pages 4 and 5, it looks like would be the maps that were preposed that you were referencing in response to that discovery request?

MS. BERRY: Yes, that is correct.

MR. TYSON: Okay. Great, thank you very much.

MS. BERRY: Thank you.

THE COURT REPORTER: And, Counsel, same orders as last time?

MR. TYSON: Same for the Defendants.

MS. BERRY: Yes.

* * *

(Whereupon, the deposition ended at 12:10 p.m.)

(Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e), signature of the witness has been reserved.)

D I S C L O S U R E

STATE OF GEORGIA Deposition of CYNTHIA BATTLES
COUNTY OF HENRY Friday January 13, 2023

Pursuant to Article 8.B of the rules and regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I, Kathryn Taylor, am a Georgia Certified Court Reporter. I am here as an independent contractor for Veritext Legal Solutions.

Veritext Legal Solutions was contacted by Taylor, English, Duma, LLP, to provide court reporting services for this deposition. The firm will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b).
Friday, January 13, 2023.

_____
KATHRYN TAYLOR, CCR
No. 5082-8490-7080-9088
CERTIFIED COURT REPORTER

C E R T I F I C A T E

STATE OF GEORGIA)
COUNTY OF HENRY)

I, KATHRYN TAYLOR, Certified Court Reporter for the County of Henry and for the State of Georgia, do hereby certify:

That the foregoing transcript is a true and accurate account of evidence and testimony taken by me in the matter of GEORGIA STATE CONFERENCE OF THE NAACP, ET AL. versus STATE OF GEORGIA, ET AL., to the best of my ability.

I further certify that the foregoing pages 5 through 36 of testimony represent a true and correct record of the evidence given upon said plea;

And I further certify that I am not a relative by blood or marriage, or an employee of attorney or counsel of any of the parties in the case, nor am I financially or in no way interested in the outcome of the action.

This, t

Kathryn Taylor

_____

KATHRYN TAYLOR, CCR
No. 5082-8490-7080-9088
CERTIFIED COURT REPORTER

1 E R R A T A S H E E T
2 DEPOSITION OF CYNTHIA BATTLES
3
4 Deposition Date: FRIDAY, JANUARY 13, 2023
5 Deponent: CYNTHIA BATTLES
6 Case Name: GEORGIA STATE CONFERENCE OF THE NAACP, et
7 al. v. STATE OF GEORGIA, et al
8 _____ I have read and examined the foregoing pages and
9 the following changes are required:
10 Page _____ Line _____:_____
11 Reason: _____
12 Page _____ Line _____:_____
13 Reason: _____
14 Page _____ Line _____:_____
15 Reason: _____
16 Page _____ Line _____:_____
17 Reason: _____
18 Page _____ Line _____:_____
19 Reason: _____
20 Page _____ Line _____:_____
21 Reason: _____
22 Page _____ Line _____:_____
23 Reason: _____
24 Page _____ Line _____:_____
25 Reason: _____

CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

_____

CYNTHIA BATTLES

I hereby certify that the individual representing himself/herself to be the above-named individual, appeared before me this _____ day of _____, 20__, and executed the above certificate in my presence.

_____

NOTARY PUBLIC IN AND FOR

_____ County Name

MY COMMISSION EXPIRES:

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.

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

GEORGIA STATE CONFERENCE OF THE NAACP, et al. *Plaintiffs*, v. STATE OF GEORGIA, et al. *Defendants*.	)	Case No. 1:21-CV-5338-ELB-SCJ-SDG
COMMON CAUSE, et al., *Plaintiffs*, v. BRAD RAFFENSPERGER *Defendant*.	)	Case No. 1:22-CV-00090-ELB-SCJ-SDG

NOTICE OF 30(b)(6) DEPOSITION OF GEORGIA COALITION FOR THE PEOPLE'S AGENDA

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, counsel for Defendants the State of Georgia, Governor Brian Kemp, and Brad Raffensperger, in his official capacity as Secretary of State of Georgia, will take the oral examination under oath of the designated representatives of the Georgia Coalition for the People's Agenda ("Ga Coalition" or "Organization") on Friday, January 13, 2023, beginning at 9:00 a.m. and continuing thereafter until completed via Zoom

Exhibit
0001

videoconferencing through Veritext Legal Solutions. Details regarding the videoconferencing will be emailed to those participating once all arrangements are finalized.

The deposition shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (*e.g.*, videotape, LiveNote, etc.). The deposition will be taken for the purposes of cross-examination, discovery, and for all other purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

Please note, under Rule 30(b)(6) of the Federal Rules of Civil Procedure, the Organization must designate one or more officers, directors, managing agents, or other appropriate persons who consent to testify on behalf of the organization. The Person(s) must be ready to testify about the information known or reasonably available to the Organization regarding the topics listed in Exhibit A, attached hereto.

Respectfully submitted this 29th day of December, 2022.

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Attorneys for Defendants

Exhibit A

1. The Organization's allocation of resources and budgetary decisions from January 1, 2021 through the present that reflect the diversion of funds and resources the Organization alleges it has undertaken in its Complaints.

2. The changes made to the Organization's budgets – as well as any contemporaneous rationale for such changes – during its budget years from January 1, 2021 through the present related to the laws, policies, or protocols challenged in this action.

3. The Organization's exempt purpose and activities it undertakes in accordance with its exempt purpose.

4. The Organization's organizational structure, including individuals who have the authority to make funding and resource-allocation decisions for the Organization from January 1, 2021 through the present.

5. The specific ways in which the actions of the Defendants that form the basis of its Complaints in this action caused the Organization to divert resources away from its organizational activities to activities in which the Organization had not previously engaged, and the identification of the overall amount of the diverted resources.

    a. The specific activities and projects the Organization was unable to engage in due to the diversion of resources to activities necessitated by such actions.

6. The activities or expenditures the Organization plans to undertake in the future related to the laws, policies, and protocols challenged in this action if it is unsuccessful in achieving relief through this action.

7. The total expenditures of the Organization on activities related to this action since the Organization began participating in this litigation.

8. The nature of membership of the Organization, including how individuals become members, any obligations of members, and any benefits offered by the Organization to its members.

9. Whether and how the Organization determined if any of its individual members are impacted by the laws, policies, and protocols challenged in this action.

10. The method(s) used by the Organization to determine which district(s) it would challenge in this action.

11. The Organization's communications with the Georgia General Assembly regarding the laws, policies, and protocols it challenges in this action, from January 1, 2021 to the present.

12. Communications between the Organization and any of the co-Plaintiffs, its individual member plaintiffs, its other members, and other advocates and advocacy organizations, concerning this litigation or the redistricting plans challenged in this action.

13. The specific relief the Organization seeks that will cause it to cease diverting resources to address the laws, policies, or protocols challenged in this action.

14. The documents produced in this litigation by Plaintiffs and the information contained in the documents.

15. The process by which the Organization searched for and identified documents responsive to discovery requests served in this case.

CERTIFICATE OF SERVICE

I hereby certify that, on December 29, 2022, I caused to be served the foregoing **NOTICE OF 30(b)(6) DEPOSITION OF GEORGIA COALITION FOR THE PEOPLE'S AGENDA** via email to the following:

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**Pro Hac Vice*

Common Cause Plaintiffs

This 29th day of December, 2022.

/s/ Bryan P. Tyson
Bryan P. Tyson
Georgia Bar No. 515411

To: Cindy Battles[redacted]
From: Rich, Bonnie[redacted]
Sent: Wed 6/30/2021 2:16:48 PM (UTC-04:00)
Subject: Re: Redistricting Hearing and Statement *** External Email *** *** External Email *** *** External Email *** *** External Email ***

Oh, I misread your email. I thought you were referring to an incident in Atlanta. No, Capitol police were not there last night.

Get Outlook for iOS

From: Cindy Battles [redacted]
Sent: Wednesday, June 30, 2021 2:05:43 PM
To: Rich, Bonnie [redacted]
Subject: Re: Redistricting Hearing and Statement *** External Email *** *** External Email *** *** External Email *** *** External Email ***

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Capitol police were in Cummings last night? We didn't see any law enforcement until the end. Also, Capitol police were aware that the man in the Trump hat and Trump shirt was harassing people Monday night. They did not do anything because he had not "crossed a line". In fact, they were more suspicious of the Black women wearing Protect the Vote shirts standing along the wall in the committee room. Not that any of us were surprised. This has happened at both in-person meetings so far. I and one other person chose not to wear our masks in Cumming last night because that is how the man at the capitol was choosing who to target. It is fast becoming an unsafe environment and my question is, what actions will the committee take to hold people accountable? Or at least let people know that type of behavior is inappropriate? There is no way the entire committee missed Stacey Abrams being referred to as a "terrorist" or the reaction when the speaker from ACLU was heckled because he said the ACLU was non-partisan. You may have missed him being called a name but the reaction was too loud to have been missed completely.

Even if you do not heed our other requests to make the process as fair, transparent, and non-partisan as possible, I ask that you take measures to make it safer.

Cindy Battles (she/her)
Policy & Engagement Director
GA Coalition for the People's Agenda
[redacted]
www.thepeoplesagenda.org

Exhibit
0010

On 2021-06-30 01:41 PM, Rich, Bonnie wrote:

Oh, no! I understand how uncomfortable he must've been for you and him. I've been treated that way, too, and it's very unsettling, not to mention inappropriate. I can assure you that I did not hear and was not aware of that, and I have not heard from any committee member who was aware. Capitol police were there; did anyone alert them?

From: cbattles [redacted]
Sent: Tuesday, June 29, 2021 6:20:37 PM
To: Rich, Bonnie
Subject: Re: Redistricting Hearing and Statement *** External Email *** *** External Email *** *** External Email ***

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Last night I described being harassed by a Trump supporter in line to sign up to speak. I said allowing name calling during testimony was creating an aggressive environment. The entire committee sat quietly while an ACLU staff

member was heckled and called a "f--king asshole" by a white woman in the fourth row and several other comments.

We are currently making sure he leaves early or with a group.

Sent from Samsung Galaxy smartphone.

-------- Original message --------
From: "Rich, Bonnie" [redacted]
Date: 6/29/21 12:13 PM (GMT-05:00)
To: Cindy Battles [redacted]
Cc: "Taylor, Darlene" <Darlene.Taylor@house.ga.gov>, "Holmes, Susan" <Susan.Holmes@house.ga.gov>, "Alexander, Kimberly" <Kimberly.Alexander@house.ga.gov>, "Ballinger, Mandi" <Mandi.Ballinger@house.ga.gov>, "Deloach, Buddy" <Buddy.Deloach@house.ga.gov>, "Dollar, Matt" <Matt.Dollar@house.ga.gov>, "Efstration, Chuck" <Chuck.Efstration@house.ga.gov>, "Fleming, Barry" <Barry.Fleming@house.ga.gov>, "Gilliard, Carl" <Carl.Gilliard@house.ga.gov>, "Jackson, Mack" <Mack.Jackson@house.ga.gov>, "Jones, Jan" <Jan.Jones@house.ga.gov>, "Nix, Randy" <Randy.Nix@house.ga.gov>, "Scott, Sandra" <Sandra.Scott@house.ga.gov>, "Setzler, Ed" <Ed.Setzler@house.ga.gov>, "Smith, Lynn" <Lynn.Smith@house.ga.gov>, "Smith, Richard" <Richard.Smith@house.ga.gov>, mickey.stephens@gmail.com, "Sutton, Julie" <Julie.Sutton@house.ga.gov>, "Bryant, JC" <JC.Bryant@house.ga.gov>, "Turner, Vanessa" <Vanessa.Turner@house.ga.gov>, "Holloman, Shunta" <Shunta.Holloman@house.ga.gov>, "Fountain, Lisa" <Lisa.Fountain@house.ga.gov>, "Clark, Peyton" <Peyton.Clark@house.ga.gov>, "Bohannon, Alicia" <Alicia.Bohannon@house.ga.gov>, "Fuller, Antarica" <Antarica.Fuller@house.ga.gov>, "Moghimi, Madeleine" <Madeleine.Moghimi@house.ga.gov>, "Wideman, Kimberli" <Kim.Wideman@house.ga.gov>, "Wright, Sheena" <Sheena.Wright@house.ga.gov>, "Brooks, Dianna" <Dianna.Brooks@house.ga.gov>, "Chappelle, Nicole" <Nicole.Chappelle@house.ga.gov>, "Lewis, Pamela" <Pamela.Lewis@house.ga.gov>, "Sims, Olivia" <Olivia.Sims@house.ga.gov>
Subject: Re: Redistricting Hearing and Statement *** External Email *** *** External Email ***

Thank you for that extra information about the signup process for the first virtual hearing. It'll be helpful as we prepare for the next virtual one. This is the first time this has ever been done, so it's been a learning process for us all.

Next time we will definitely have alternates or a waiting list in case we have so many no-shows again. Having a big joint meeting like that is such an investment for everyone involved, we all wish we'd thought of it before! Chairman Kennedy was just trying to use the time we had to let people speak in person that day -- it wasn't part of our original plan.

I think that rumor you heard was just a theory -- I haven't seen any evidence of that. I sure hope that isn't the case, because, as I said, many people had put a lot of work and heart into that meeting.

I'll forward your email to our Policy Analyst department so they can coordinate with IT on the Google Doc.

From: Cindy Battles [redacted]
Sent: Tuesday, June 29, 2021 9:45:27 AM
To: Rich, Bonnie
Cc: Taylor, Darlene; Holmes, Susan; Alexander, Kimberly; Ballinger, Mandi; Deloach, Buddy; Dollar, Matt; Efstration, Chuck; Fleming, Barry; Gilliard, Carl; Jackson, Mack; Jones, Jan; Nix, Randy; Scott, Sandra; Setzler, Ed; Smith, Lynn; Smith, Richard; mickey.stephens@gmail.com; Sutton, Julie; Bryant, JC; Turner, Vanessa; Holloman, Shunta; Fountain, Lisa; Clark, Peyton; Bohannon, Alicia; Fuller, Antarica; Moghimi, Madeleine; Wideman, Kimberli; Wright, Sheena; Brooks, Dianna; Chappelle, Nicole; Lewis, Pamela; Sims, Olivia
Subject: Re: Redistricting Hearing and Statement *** External Email *** *** External Email ***

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Chairwoman Rich,

I submitted my statement in writing per your instructions but given that I wanted to remark on the process before the meetings are concluded and I am not sure when the submitted written statements will be read, I took the additional step of emailing them directly to the committee. As I mentioned to your staff, there also needs to be a way to attach documents to the statements in case people want to submit data to support their statements. I hope that can be altered to accommodate. I have used Google forms to recruit fellows in the past and it was possible for them to upload a cover letter and resume.

But I am glad you brought up the first meeting. First, there is a rumor that people deliberately signed up and did not log in to give fewer people the chance to speak. I am not sure where that was founded but it does emphasize the need for a waiting list if you are going to limit the virtual meetings to only sixty people. Further, after the word went out that only sixty people would be allowed to speak, we were told an email would go out to let people know whether they were one of the sixty or not. Very few people that I know who signed up received those emails, some had to check in to find out if they were on the list, others assumed if they did not receive the email they were not on the list. I do know that one name you called had not received an email. If you create a waiting list, you will have a list of names to call on if people do not log on, have internet/computer issues, or defer their time. That would allow you to hear from more citizens who want to be involved in the process.

Also, a number of us asked about attending the virtual meeting in person and were told we could not. So, it was a surprise to us when Chairman Kennedy gave "the public" a chance to speak. While it was probably a mistake, it does not give confidence when people are already suspicious of the process.

I do not envy you the task in front of you but I do hope it can be conducted in a manner where citizens feel safe, heard, and considered when the maps are finished.

Thank you,

Cindy Battles (she/her)
Policy & Engagement Director
GA Coalition for the People's Agenda
[redacted]
www.thepeoplesagenda.org

On 2021-06-29 08:35 AM, Rich, Bonnie wrote:

As we explained last night, please submit all written testimony to the central portal by clicking the banner at the top of our home page: www.house.ga.gov. In addition, as is customary with legislative committee meetings, we made the Zoom link available to all members of this Committee. We held an earlier virtual hearing at which all Georgians were invited to speak virtually; unfortunately, more than half of those who signed up to speak did not log into Zoom to do so. The hearing last night was for non-legislators wishing to speak in person. If you would like to attend a virtual hearing, we will have another one later this summer.

Georgia General Assembly
www.house.ga.gov
Georgia General Assembly, is one of the largest state legislatures in the nation. The General Assembly consists of two chambers, the House of Representatives and the Senate.

From: Cindy Battles [redacted]
Sent: Monday, June 28, 2021 9:33:26 PM
To: Rich, Bonnie; Taylor, Darlene; Holmes, Susan; Alexander, Kimberly; Ballinger, Mandi; Deloach, Buddy; Dollar, Matt; Efstration, Chuck; Fleming, Barry; Gilliard, Carl; Jackson, Mack; Jones, Jan; Nix, Randy; Scott, Sandra; Setzler, Ed; Smith, Lynn; Smith, Richard; mickey.stephens@gmail.com
Cc: Sutton, Julie; Bryant, JC; Turner, Vanessa; Holloman, Shunta; Fountain, Lisa; Clark, Peyton; Bohannon, Alicia; Fuller, Antarica; Moghimi, Madeleine; Holloman, Shunta; Wideman, Kimberli; Wright, Sheena; Wideman, Kimberli; Brooks, Dianna; Chappelle, Nicole; Lewis, Pamela; Sims, Olivia
Subject: Redistricting Hearing and Statement *** External Email ***

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Chairwoman Rich and Members of the Committee,

Given that two minutes is not enough to make meaningful comments on the redistricting process in Georgia, I wanted to make sure you got my full testimony so that you can see the concerns we have with the way this process has played out so far and the way it seems to be continuing. It is difficult to say what will happen given that you have not gotten the data; but, given that multiple people were aware of the rumor you intend to redraw districts so that either Carolyn Bordeaux or Lucy McBath lose their seat, it appears that people already know or believe it is not going to be fair. I have attached my full prepared statements to this email and will send an identical email to the Senate Committee.

Our concerns about this process has honestly increased since today's meeting. Not only is the public not being given enough time to make comments, but members of the Republican party are being allowed to to call political activists/candidates they do not agree with names like "terrorist" with no admonishment from either Chair. It does not surprise me that myself and several others in line were harassed by a man wearing a Trump hat and t-shirt who complained about losing his "original neighbors" during his testimony. The environment is one that allows for name calling and even threats with little to no accountability. If you do not set the tone, the harassment will continue.

It was also surprising to see that Zoom testimony was made available for Speaker Jones given it was not an option for Georgia residents, some of whom sat in traffic for hours before giving up hope of making it to the one meeting happening in the metro area. Should I be surprised that Speaker Jones used her time to share revisionist history and what could almost be called propaganda? Yes, Democrats gerrymandered the districts egregiously but Republicans used Section 5 of the Voting Rights Act to sue. AG Holder "pre-approved" the maps because of timing and because it was no use suing Republicans when SCOTUS was still deciding Shelby v. Holder. Further, Speaker Jones neglected to mention the mid-session redistricting that occurred to ensure that while Republicans still only had 53% of the vote, you won a super majority in the Senate. Her speech gave no one hope this process was going to be fair.

Elections do have consequences. I am just wondering if one of those consequences is one party cheating to make sure they decide the next election? It has been done by both parties but at some point, it is incumbent on one party or the other to do the right thing. Republicans may gerrymander districts but if you do, how will you hold Democrats accountable when they are once again in the majority and return the favor? The losers in all of this is the Georgia voter, regardless of party.

Cindy Battles (she/her)
Policy & Engagement Director
GA Coalition for the People's Agenda
[redacted]
www.thepeoplesagenda.org