EXHIBIT G

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF NAACP, et al.,	)	No. 1:21-CV-5338-ELB-SCJ-SDG
Plaintiff,	)	
vs.	)	
STATE OF GEORGIA, et al.,	)	
Defendant.	)	

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE
(MS. GINA WRIGHT)
January 26, 2023
9:17 a.m.
18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

Q In September?
A No.
Q In October?
A Possibly. October sounds -- maybe.
Q Late October?
A It had to be in that time window because it's a narrow time window, so maybe October.
Q Late October?
A I couldn't say specifically.
Q Do you recall if it was closer to when the September 27th map was made public or was it closer to when the ultimately enacted map was made public?
A I don't think it was close to the September time frame, but I don't know exactly the date.
Q Do you remember, what did you guys talk about?
A The Congressional map.
Q Who was at the meeting?
A The -- the names I gave you previously.
Q So just to be clear, you had a meeting with -- about the Congressional map at some time closer to the enacted map's publication with Chairmans Kennedy, Rich, Mr. Tyson, Speaker Ralston, Lieutenant Governor Duncan, and staff of the Speaker and Lieutenant Governor?
A That's correct.
Q Do you remember how many staff?

A No. I was in my office on a Zoom call and I was not in the actual room with them, so I don't know who all was in the room.

Q Was everyone -- maybe you don't know this, but was everyone else in a single room and you were on the video?

A I can't say that everyone. Most of them were in a single room. I don't recall there being someone else on the Zoom call, but...

Q Was -- was a map projected when that was taking place?

A Yes.

Q Did you have the ability to change the map's composition when that occurred?

A Yes.

Q Did anyone on that call ask you to make changes to the lines at that time?

A Yes. We worked on adjusting the map during that call.

Q It was a working session?

A Yes.

Q And changes were made?

A Yes.

Q At the direction of Chairman Ralston?

A Speaker Ralston?

Q I apologize. Excuse me. At the direction of Speaker Ralston?

A Yes. I think there was a group discussion about things. I don't know that it was a single person who said do this, but...

Q Somebody on the other side of the Zoom --

A Uh-huh.

Q -- gave you an instruction about how the composition lines would look and you followed it?

A Yes. We would try different scenarios.

Q I just want to understand what you are saying. So would it be fair to say that it was difficult to discern who was in charge of that instruction, but it was someone on the other side of the call?

A It's not difficult to discern, but there was discussion happening.

Q I see.

A So as listening to the discussion, I would then attempt to try and create a sample of what it was that they were looking to see.

Q So it was a collaborative process amongst the people on that Zoom call?

A Yes.

Q Are you aware of how the individuals on the Zoom call obtained -- you know, built their opinions

point, but I don't recall a specific e-mail with him.

Q The same reasons why you didn't really e-mail the Congressional map?

A Yes.

Q Okay. Do you -- did -- I think you told me that Chairman Kennedy provided you with specific instructions about how the lines of the map should be drawn?

A Say that one more time. I'm sorry.

Q Sure.

Did Chairman Kennedy provide you with specific instructions about how the lines of the State Senate map should be drawn?

A No.

Q Did you receive any specific instructions about how the lines of the State Senate map should be drawn?

A Initially, no.

Q How did you make a determination about how to draw the lines for the State Senate map?

A That was a -- basically a -- call it a blind map, but it was a map, just a starting point map to address the population changes in the state and make adjustments to the districts as they were, to try and have a starting point, a discussion map to -- to start with.

you about Mr. Tyson's role?

A I believe so.

Q So Mr. Kennedy -- pardon me. Chairman Kennedy sees the blind map, and then what happens? Does he direct you to make changes to it?

A That being a starting point map, then yes, we began to work within it to make adjustments for whatever requests people wanted to try and modify the map, however he wanted to try to best accommodate requests and things that were brought to him.

Q And you had a lot of conversations with him?

A Yes.

Q A lot of conversations about modifying the blind map?

A We did have conversations about modifying it, yes.

Q Were those conversations ever in person?

A Yes.

Q Were they mostly in person?

A Yes.

Q When you had those conversations, was the map projected onto a screen?

A Not necessarily.

Q But sometimes?

A Sometimes.

Q When you had the conversations when the map was projected onto the screen, was it within Maptitude?

A If I'm looking at the map, it would have been in Maptitude.

Q Okay. And you know how to use Maptitude?

A Yes.

Q Was data projected onto the screen?

A Sometimes it may have been. Not all the time.

Q Why would you look at a map without any data related to it?

A You are just reviewing the geography. You wouldn't necessarily be looking at the data. You are looking at the composition of districts, the counties, precincts and things.

Q When data was projected onto the screen, what type of data was it?

A Typically, our data would include the total population, the deviation, the percent deviation, voting age population. Most of the fields that you see on our population summary reports would be also included on there, as well as political data.

Q I recall that there's data related to the race of the population on those summary reports.

A Correct.

Q Was data related to the race of the populations

projected onto the screen?

A It could have been sometimes.

Q Most of the time?

A Most of the time. We usually projected all the race data that we would use on the reports, as well as the political data that they were reviewing. So both together.

Q Was that data relevant to you making -- I'll rephrase.

Did Chairman Kennedy consider that data when making instructions about how to draw the lines?

A I would assume he did. I don't know what Chairman Kennedy considered.

Q Was it sort of a collaborative conversation or was it really just Chairman Kennedy giving you instructions and you following them?

A Can you explain what you mean by that?

Q Yeah. I can imagine that Chairman Kennedy told you you need to move this line in southeast Georgia and then you did it. Or Chairman Kennedy could say, what would happen if I moved -- you moved this line in southeast Georgia? You could say, well, Chairman, this or that.

A I'd say it's more like the second scenario.

Q Okay. What type of questions did he ask you?

Kennedy, Mr. Tyson and Ms. Paradise and other senators?

A The changes, I think, came at the request of the senator, and then Chairman Kennedy authorized to try and see if we could do what he had requested.

Q At the request of the senator, what senator are you referring to?

A Senator Rhett.

Q So there was the map that was published first?

A Uh-huh.

Q And then Senator Rhett requested changes?

A Uh-huh.

Q And as a consequence of that, you made changes?

A Yes.

Q And then another map was published?

A Yes.

Q Were there any other changes requested?

A I cannot recall. That one stands out. I remember doing that one. I don't recall if there were others in that draft.

Q Why does it stand out?

A I have drawn a lot of maps, so...

Q Yeah. So why does that one stand out?

A Because in committee, I remember there was discussion over the change, that that was in the committee meeting, so that one sticks out. That may have

been the only one that went into that final version because other -- other changes might have gone into the other version, the first presented version before we got to that, but there were members, you know, putting changes in.

That one just jumps out at me. That may have been the only one that went into that last version.

Q Did you speak with anyone else in addition to the people you referred to for any reason about the State Senate map?

A I probably spoke with a lot of senators regarding that map.

Q Right. Right. Okay.

A So I don't want to list all 56 of the members --

Q Yeah.

A -- that were here then, but I spoke with a lot of members at that point, from the time -- especially when the map was made public, those that requested things.

Q Did you speak with anyone in the House about drawing the State Senate map?

A I don't think so.

Q Did you speak with anyone outside of the General Assembly about drawing the State Senate map?

look like?
A There was a lot of input everywhere.
Q And it was hard to look at all of it?
A Yes.
Q Right. You weren't able to look at all of it?
A I looked at a lot of it but not all of it.
Q Yeah. There was a lot you didn't look at?
A I don't know that I'd say there was a lot I didn't look at.
Q Okay.
A But I did watch or attend every public hearing.
Q Okay. We have just been talking about the State Senate map, and you described a blind -- I'm going to call it a blind map process. Does that make sense if I said it that way?
A Sure.
Q Yeah. I should back up. What was your role in drawing the State House map which Governor Kemp signed into law?
A It was the same as the House, or as the Senate and Congressional.
Q Okay. And did you use the same blind map process to draw the State House map?
A Yes.
Q Was Brian Knight involved at all in drawing the

Q Well, so -- sure. Let me rephrase.

You referred to having a working session with Chairman Kennedy, Mr. Tyson, Ms. Paradise about the State Senate map. Am I recalling that?

A Right. Well, we would have had several meetings where we discussed the map. There wasn't one session where we had other multiple senators involved at the same time that I recall. So the Senate was a little different in that respect.

Q You met with Chairman Rich regarding the State Senate map?

A Yes.

Q Was it the same type of process that you had with Senator Kennedy, where you had a blind map and then you reviewed it with her?

A Yes.

Q And then she, as the sponsor of the map, would either direct you to make changes or bring in other members of the House who would make directions for changes?

A Yes. It was my understanding both chairmen were meeting with members and had opened up office time and meeting time to take input from the members about the map and their districts. And I don't know how many members each of them met with, but they did have those

meetings and that frame of reference. So that when we met together, they could use those meetings and the input they received from members to make adjustments if the -- if the draft didn't look -- if they felt like this member had requested this and we weren't -- if we could accommodate things, we would try to accommodate those things.

Q But you weren't involved in those meetings?

A I was not.

Q Was anyone in your office involved in those meetings?

A No.

Q You just knew they existed?

A Right.

Q Would Chairman Rich mention them to you?

A Yes.

Q Sometimes specific meetings?

A Maybe.

Q Yeah.

We've been going about an hour, I think. Would this be a good time to maybe take a 15-minute break?

A I'm -- whatever.

THE WITNESS: Patrick?

MR. JAUGSTETTER: Sure.

MR. CANTER: Thank you.

received directions from -- sorry, I'll rephrase.

You mentioned earlier that with regards to the Senate map, you received directions on how to draw the lines from -- either directly from Chairman Kennedy or through Chairman Kennedy from other senators. Is that basically right?

A Yes.

Q And it was the same process with the State House map but with Chairman Rich, not Chairman Kennedy?

A Yes.

Q What was your process for receiving directions on how to change the lines with regards to the Congressional map?

A Well, I think we talked about the meeting, jointly meeting with them, so same type of thing. Input from whatever they had, conversations or whatnot. There were also considerations, of course, from things we had heard from public hearings and other things to try and incorporate into those maps, so those decisions were made in coordination with all of that together.

Q Did you use a blind map for the Congressional map -- sorry, let me rephrase.

A Yeah.

Q You mentioned -- that's fair.

You had mentioned creating a blind Senate map

same thing?

A Right. The fewer the splits, the easier it would be for them to assign voters, especially under a compressed time frame.

Q Got it. I understand that's especially the case with precinct splits?

A Yes.

Q As part of your analysis of the maps, what did you do to confirm that they were in compliance with the Voting Rights Act?

A So compliance with the Voting Rights Act is a legal opinion, so my work on drawing the map would create -- try and maintain districts that we had previously had that were districts that had been majority-minority population districts. We try not to reduce the number that we had before, and I would try to make sure that what we were drawing, to the best of my ability, continued that, if possible, but then I would also ask them to have those reviewed by counsel for that compliance.

Q So would it be fair to say that as a nonlawyer, you tried your best to ensure compliance, but ultimately that wasn't a determination you were making?

A True.

Q Okay. And the way you tried your best was to

recommended to add to 6 on that.

Q What do you mean by "e-mail list"?

A We talked about that. I had an e-mail from his staff.

Q Oh, I see.

A It was in the documents somewhere.

Q I understand. So there was an e-mail from the staff of Chairman Kennedy?

A Chairman Kennedy, uh-huh, on his behalf.

Q And the e-mail -- and I know I'm partly paraphrasing here -- but roughly said, hey, here are some things we would like you to do for your blind map?

A Right. Well, they didn't call that a blind map, but here's some things we'd like to try on a Congressional map.

Q Do you know why Senator Kennedy's staff wanted to try adding Forsyth into CD 6?

A The desire for district -- or for congressional District 6 was to make it a more politically electable district.

Q Politically electable for whom?

A For the party of the people who were drawing the map.

Q How was that information conveyed to you?

A It is obvious to me, but, I mean, I don't -- I

don't -- that discussion I think was had at some point.

Q Sorry. Sorry.

A I don't --

Q That question --

A -- have a specific --

Q Yeah.

A -- moment.

Q What makes it -- what makes it obvious to you?

A Forsyth County tends to vote Republican. It was a political decision.

Q If you are gonna add Forsyth County, you are going to have to take away something else. Is that right?

A Right. So as the map from the bottom -- of course, we have mentioned south Georgia's loss of population, those three congressional districts across the bottom, and I think even District 12 had a loss of population or were below in population. They had to reach upward. It sort of pushed the entire map. It did this on all three. The effects of that on all three maps pushed things northward.

So some districts around the middle and in the upper parts in the Metro area were gonna get shifted further up to where the population was. So the growth in population there added into District 6 also gave -- met

their political goal for District 6, so that would be the decision they made to push that district into Forsyth.

Q Are you aware that the benchmark Congressional District 6 -- I'm pretty sure I'm right about this one -- was within 600 persons of the ideal population size for a Congressional map?

A Yes. I think some of them were closer to the target size than others, depending upon the pace of growth. But in any redistricting map, we always say that doesn't mean you can leave one district in a vacuum. The effects of other districts, the desires of, you know, what they want to see in the map impact the shape of the district, so...

Q It seems like adding Forsyth was one of the first proposals, though; is that right?

A It was on that initial draft.

Q The initial list --

A Uh-huh.

Q -- requesting information, right?

Are you aware of any other reasons why Forsyth was added to -- just we'll start with the September map?

A Other than political reasons?

Q Other than the direction from the e-mail from Senator Kennedy's -- Chairman Kennedy's staff.

A Well, as I said, I think that was the political

goal for District 6, so...
Q Ultimately in the passed map, Dawson was added as well?
A I'm sorry, can you say that again?
Q It looks like, when I look at the passed map, Dawson County was added on top of Forsyth.
A You mean passed, approved. I was wondering --
Q Oh, no, I didn't --
A -- when you said passed, and I was like --
Q I'm sorry.
A I was like, what, what?
Q I was told I need to stop that. Enacted?
A Enacted.
Q Yeah.
A Yes.
Q I'll --
A Yes.
Q -- rephrase.
Yeah. Ultimately the enacted map includes --
A Dawson.
Q -- Dawson County as well?
A That's correct.
Q Yeah. What was -- how did you get the direction to add Dawson County to the enacted map?
A That was discussed in the meeting we talked

about earlier that I was on Zoom, and we worked on the map, the Congressional map, and that --

Q So --

A -- was discussed in that meeting to increase --

(Zoom interruption.)

THE WITNESS: Okay. I don't know --

MR. JAUGSTETTER: Keep going.

THE WITNESS: Okay. What was I saying? The meeting. Yes, that was discussed in the meeting, to add that into District 6 to further -- to further increase the Republican percentage in that district.

Q BY MR. CANTER: I believe that meeting included Chairmans Kennedy and Rich, Mr. Tyson, Speaker Ralston, Lieutenant Governor Duncan, and some of the Speaker and other Governor staff, right?

A Yes, that's correct.

Q Do you remember who directed you to add Dawson?

A If I recall correctly, I think it was Speaker Ralston.

Q Did he provide a reason?

A As mentioned, the discussion was about the Republican percentage of the way the district would vote, so that was what was being looked at and discussed as it was -- as we were trying that out.

Q I believe you said that a map was up on the

screen during this conversation?
A Yes.
Q Was demo -- demographic data reflected on the screen as well?
A Yes. There would have been demographic, as well as political. I'm not sure how clearly they could see that from where they were and the way that it was projected, because I wasn't there with them, but it would have been on the screen for -- while we were doing it.
Q Do you know if there was data reflecting the race of citizens in the different districts on the screen? Was it racial data --
A What do you mean?
Q Yeah, was it racial data reflected on the screen?
A Yes.
Q Yeah, it doesn't mean you had demographic, yeah.
A Racial data, as well as political data.
Q I'm sorry. I might have misheard you.
A Yes.
Q Thank you for that confirmation.
Did you literally make the change to Dawson during that meeting?
A Yes.

Q And did the data change on the screen when you made it?

A The data would change when you --

Q Yeah, yeah.

A -- change the map, yes.

Q So the -- the members -- the participants in the meeting on the other side of the Zoom at least could have seen the changes in the numbers?

A They could have. The pending change box that shows up, I don't know if you are familiar with Maptitude, but it will only show the changing number while you have the selection highlighted.

Once you click that into the district or make that change, then it switches to the new. You then can't see the previous. You are not seeing both at the same time.

Q Yeah, no, I know what you mean.

A Yeah.

Q So when you were about to change -- when you were about to add Dawson to CD 6, you could see the racial composition of Dawson under the September map next to the racial compo- -- I'm sorry, the racial composition of CD 6 on the September map next to the racial composition of CD 6, or would it change --

A No.

Q Okay.
A It's going to show the two districts. So whichever district you are moving it out of and the district you are pushing it into, it's going to show the new number for what that would be if you moved -- if you --
Q Okay.
A -- clicked that, made that change.
Q So right before making -- right before adding Dawson into CD 6, they are able to see what the new racial composition of CD 6 would be?
A Right. They would see the new number. They wouldn't see the previous --
Q Right.
A -- at that point.
Q Yeah. But before adding that, you would have seen the previous --
A Right.
Q -- composition? Okay.
A You could have, yes.
Q Yeah, yeah, if they looked.
A If you are looking, yeah.
Q Yeah, right. And then you click it, and it's added?
A It switches.

Q Yeah.

Was the discussion just, let's add Dawson, or was there anything more specific about that? It looks like the entirety of Dawson County was added.

A Yes. We moved -- both those two counties were in -- added in whole. Of course, trying to divide counties was not -- as we talked about earlier, it poses problems with elections and whatnot, so trying to limit the splitting of counties.

I think there was discussion about the fact that Georgia 400 runs up through that district, so there is a common road traveling through there, as far as those areas being together, but the -- there was a lot of discussion going on. Again, I wasn't in the room, so it's...

Q Could you hear what was in the room?

A I could, but again, I'm looking at other things while they are discussing --

Q I see.

A -- what they are doing.

Q So based on your knowledge -- I understand you couldn't necessarily hear everything, but based on your knowledge, was there any other factors that were considered in the room when deciding to add Dawson County to CD 6?

A To my recollection, adding Dawson to CD 6 had to do with the political numbers of the district. That was the only thing.

Q Okay. You just mentioned that you try hard to not cut counties. Is that right?

A Correct.

Q I see the new CD 6 cuts right through Cherokee. Is that right?

A Yes.

Q Did I pronounce it correct?

A Cherokee.

Q Yeah. When was the decision made to add this portion of Cherokee County to CD 6?

A I think that was a part of that meeting as well. We were working on the shape of District 6 --

Q Okay.

A -- and the political performance of District 6.

Q Who asked that this portion of Cherokee be added to CD 6?

A I don't recall.

Q But it was someone that was in the room?

A Right. As we were making adjustments in that area to District 11 and District 6, that I think we were able to put Bartow County back together, it previously had been split before, but then population-wise required

that splitting in Cherokee. There was a lot of movement in making adjustments in those two districts in that area during that meeting.

Q Yeah. Can you help me out? Can we go to the September map for a second, just -- oh, I see. Bartow County was split in CD 11 in the September map?

A Right.

Q But when you added Cherokee to CD 6, you were able to keep Bartow County whole --

A Yes.

Q -- in the passed map?

A Right.

Q Okay. The -- the line that cuts through Cherokee --

A Uh-huh.

Q -- right, it's kind of jagged?

A Uh-huh.

Q Right?

A It's a river.

Q It's a river. Okay. So it follows the river?

A That's -- yes. The precinct lines there follow the river, and so, therefore, it's following the precincts, which is, I think, follows the river.

Q Great. Thank you for that.

A Uh-huh.

Q It looks like a portion of Cobb County was taken out of CD 6. Let me rephrase the question.

I'm looking at the side-by-side map right now.

A Okay.

Q I think it's helpful right now. And I see in the benchmark CD 6, there is more Cobb County than in the enacted CD 6?

A Uh-huh.

Q Do you recall taking a portion of Cobb County out of CD 6?

A Specifically, no. As I said, we were doing a lot of movement in that area on the map. And again, the push of population does impact what -- where those lines are drawn. I don't specifically recall --

Q Okay.

A -- what we did, you know.

Q Do you think that you made that change regarding Cobb County and CD 6 during the working session that we've been discussing?

A Cobb County was divided on both of the versions from September. In CD 6 it had been -- even before that, I think it was split. So that area had always been a portion of District 6; it had always been divided. So it's a similar line on all three versions. I mean, if you look at -- I'm trying to remember which. This is the

prior.

Q Yes.

A So this would have been the benchmark.

Q Yeah.

A And then this is the September. All three, that same East Cobb area is in District 6. So to give you the specifics of how many people moved one or the other in that area, I don't know.

Q Got it.

Some portion of CD 6 -- well, let me back up.

You added a portion of Cherokee, all of Forsyth, all of Dawson into CD 6 for, ultimately, the enacted plan?

A Uh-huh.

Q Adding more people, you've got to take some people out. Was there any discussion about where you were going to take people out?

A So I think that had been done on the September map when we moved District 6 out of North DeKalb.

Q I see. So was the decision to move -- remove a portion of DeKalb from CD 6 made in the e-mail provided to you from Chairman Kennedy's staff?

A I believe that it did say to shift 6 out of DeKalb and up into Forsyth, so yes.

Q Do you recall any other directions from Chairman Kennedy's staff about the composition of CD 6?

A Not specifically, no.

Q Do you remember any other discussions about CD 6 during -- about the composition of CD 6 during the working session that we've been talking about?

A Yes. There was discussion about a proposed -- or a candidate, a potential candidate in District 6 that where that person lives and something about that person.

Q Do you remember the potential candidate?

A I'm trying to remember his name.

Q It was a he?

A It was a he.

Q McCormick?

A No.

Q But it was a potential candidate that you wanted to keep in CD 6?

A That they wanted to not have in CD 6. But, of course, candidates for Congress don't have to live in the district anyway, so...

Q Did you talk to anyone who either is in Congress or who -- actually, I won't make -- break it down. Did you talk to anyone in Congress about the composition of CD 6?

A Did I talk to anyone in -- say that one more

time.

Q Yeah. Did you talk to any congressional representatives about the composition of CD 6?

A About 6, specifically 6, no.

Q Okay. But you talked to congressional representatives about some other portions of the map?

A I did speak with a member of Congress about the maps, and this was at the beginning before there were proposed maps produced, yes.

Q Which member?

A Sanford Bishop.

Q Is there anything else about -- did you receive any other directions than what we discussed about the composition of CD 6?

A I think that the portion that went into Gwinnett was something requested from Chairman Rich on the final version.

Q Oh, oh, I see, the portion in the north part of Gwinnett?

A Yes.

Q Do you know why Chairman Rich asked to have that portion?

A I think she has connections to that area, so I assume that's why, but she didn't specifically tell me that.

MR. CANTER: We can go off the record.

THE VIDEOGRAPHER: The time is 11:44 a.m. We are going off the video record.

(The deposition was at recess from 11:44 a.m. to 12:56 p.m.)

THE VIDEOGRAPHER: 12:56, we are back on the video record.

Q BY MR. CANTER: Hello, Director Wright.

A Hello.

Q During the break, did you speak with your counsel about the subject or the contents of this deposition?

A No.

Q Did you speak with anyone else about the subject or contents of this deposition?

A No.

Q If you recall before the break, we were discussing the enacted CD 4; is that right?

A 6.

Q The enacted CD 6, excuse me.

A Yes.

Q Yes. Dawson County was added to CD 6. Do you know the racial composition of Dawson County?

A No, I don't, not specifically.

Q Do you know the racial composition of Forsyth

County?
A Not specifically, no.
Q Would you agree that Dawson County is majority white?
A I believe that to be true.
Q Would you -- would you agree that the vast majority of Dawson County is white?
A How would you measure vast?
Q More than 70.
A That very well could be true. I don't -- again, I don't know the demographics.
Q Sure. But based off your experience as a demographer, you're pretty sure it's more than 70?
A I would think it's around that at least.
Q Would you agree that Forsyth County is majority white?
A I believe that to be true, but I'm not sure of the numbers again on that one either.
Q Still pretty high?
A Probably pretty high.
Q Would you agree that Cherokee County is majority white?
A I believe that's true.
Q Do you know whether the portion of Cherokee County that was added into CD 6 is majority white?

A I don't know the demographics specifically.
Q Would you agree that the portion of Cobb County that was taken out of CD 6 is majority people of color?
A Again, I'd have to look closely. The areas are very similar, so you are looking at a few precincts, and I don't know the demographics of those precincts specifically.
Q The last one is, would you agree that the portion of DeKalb County taken out of CD 6 is majority people of color?
A I don't know that to be true either.
Q Okay.
A DeKalb.
Q DeKalb, thank you. DeKalb County.
A Sure.
Q Now, looking at those changes to CD 6 in totality, adding in Dawson and Forsyth counties, taking out Cobb and DeKalb counties, would you agree that this -- these changes make CD 6 more white?
A I would have to look at the data to verify that. I'm not 100 percent sure that they do.
Q Do you have a sense right now?
A I have no reason to think that you're wrong based on the demographics of the counties that were added in, so that's probably true.

Q Okay. Okay. Do you know if Lucy McBath was the candidate of choice for voters of color?

A Voter -- I don't know where. I don't know. In what --

Q Sure.

A -- election?

Q Do you recall that Representative Lucy McBath represented CD 6 from 2020 to 2022?

A Yes.

Q Do you know that in the -- whether in the 2020 election Representative McBath was the candidate of choice for people of color?

A I don't know. She was elected from the voters in District 6. I don't know the demographics of what that district was at that time, so I can't speak to whether that was voters of color or just the voters of the district.

Q Can you go back to, I think it was Exhibit 2, which is the enacted Congressional map. And you see that CD 4 is next to CD 10?

A Yes.

Q All right. And if you go to page 2, you have a blowup of CD 4 next to CD 10, right?

A Yes.

Q Did you draw the lines that separated CD 4 from

CD 10?

A Yes.

Q Do you remember drawing those lines?

A Specifically, no.

Q Okay. Okay. Do you see Oxford is right at the edge between CD 4 and CD 10?

A Yes.

Q I'd like to pull up an exhibit on Exhibit Share, so it should pop up on your computer.

(Deposition Exhibit 5 was marked for identification.)

MR. DAVIS: I'm going to share my screen, so you should be able to see it on your screen in a second here.

MR. CANTER: He's loading it.

MR. DAVIS: Okay. Can you see something on your screen? I'm going to make it bigger for you.

THE WITNESS: Yeah, I see something.

MR. DAVIS: I will make it bigger. There we go. Is that -- can you see anything?

THE WITNESS: I can see red outlines with blue, red, gray.

MR. DAVIS: Great. We can zoom in. If you want us to zoom in at any point, just let us know, please.

THE WITNESS: Okay.
Q BY MR. CANTER: So I'm going to describe the image on the screen right now.
A Okay.
Q The blue line represents the congressional district line.
A Okay.
Q Below is CD 4. Above is CD 10.
A Okay.
Q Does that make sense?
A Yes.
Q The gray box is the city of Oxford.
A Okay.
Q So if you recall from Exhibit 2 we just looked at, it's right around where I was pointing to.
A Uh-huh.
Q Right? The red lines are the state precincts.
A Okay.
Q Does that make sense?
A Yes.
Q Okay. Have you ever -- have you ever looked -- when you -- how about this. When you are drawing maps, do you ever look at the map this zoomed in on an area in the state of Georgia?
A Yes.

Q And why do you do that?
A There could be a lot of reasons why you would zoom in.
Q Sure. Can you describe some of the reasons why you would zoom in?
A Oh, well --
Q Yeah.
A -- I mean, on a Congressional map, we try to use whole precincts where we can, but because you have to draw them to as a population, or we draw them to a population of zero deviation, you are going to have to zoom in down to block level to get the correct numbers of population so that you can have that deviation to that -- that tight range.
Q Okay. So you testified earlier that an important goal for drawing is to not cut state precincts?
A Right.
Q And one of the reasons you provided was that it's administratively difficult --
A Uh-huh.
Q -- for the election administrators?
A Yes.
Q Can you describe why it's administratively difficult?
A So when an elections official assigns voters a

ballot in a split precinct, they have to create a combo for the unique district combinations in that precinct, unless they change their precinct lines, meaning the voters that are in one district have one combo that reflects that in the other district assignments that they are in; and voters that are in that same precinct that have a different district assignment would require a different combo, so that they receive the correct ballot when they go to vote.

Q Okay. Now, if we look back at this image and we look at how the blue line cuts through the city of Oxford --

A Uh-huh.

Q -- it looks to me like that line is cutting through the state precinct; is that correct?

A That looks to be, yes.

Q How would, on a sort of technical level, you accomplish drawing a line that cuts through a state precinct?

A What do you mean how would I accomplish it?

Q So you drew -- you drew this line so that CD 4 and CD 10 have this composition, right?

A Right. So drawing is clicking with a mouse, not drawing.

Q Yeah, yeah. Fair enough.

A Okay.

Q So when you are clicking with a mouse to create the line between -- I'm going to say it's between CD 4 and 10, because that's what we are looking at. What do you need to do to draw -- to create a line that cuts through a precinct? Is it a different process than creating a line that goes along a precinct?

A So you'd select which type level of geography you are using for what you are clicking on.

Q Sure.

A You can click on the larger geography. You can click on counties. You can click on precincts or voting districts. You can click on Census blocks. When you get down to this level, you would be clicking on Census blocks.

Q Please go on.

A At that level. And that's the level you would be at so that you would know, because you are trying to reach that perfect ideal district size, finding the right combination of the population in the Census blocks to achieve that.

Q You would -- and just so I understand, you would have to be at the Census block level in order to draw a line that cuts through a state precinct?

A Say that one more time.

Q So is there racial data at the block level?
A Yes.
Q All right. Is there any other type of demo -- data at the block level?
A So when we build our precinct layer, we do allocate the election data to the block level, so we have that political data at that level. It's estimating, based on the demographics in there, based on registered voter demographics kind of corresponds the two and allocates down to that level. So we do have estimate political data at the block level when we do this.
Q When you are drawing a map and you are looking at the block level --
A Uh-huh.
Q -- is data reflected on the screen?
A Yes.
Q And is the estimated election data on the screen with the other data?
A Yes.
Q You agree that the line we're looking at here splits through the precinct, right?
A At the time, Newton County was considering precinct changes. We were working with several -- their elections office, and we had a draft precinct layer that they were considering, so it's possible that I referred

earlier today?
A Yes.
Q About the Congressional map?
A Yes.
Q Do you remember talking about the line that separated CD 4 and 10 during that working session?
A No, I do not.
Q At any other time, do you recall communications or requests related to drawing the line between CD 4 and 10?
A I don't remember conversation about the line. In that area, there was a question about an address at one point. I don't remember where it fell and whose it was, but that's the only thing I remember about that area.
Q When you say a question about an address, would that be an incumbent address?
A I don't know whose it was.
Q Okay. Just a question.
How often were you looking at the block level when drawing maps?
A I don't have an answer for that. It varies.
Q Would it be fair -- would it be fair to say that you looked at the block level a lot?
A When you get to the point of where you are

A Yes.
Q And they probably weren't looking at precinct level data?
A Probably not.
Q Okay. Can you go back to Exhibit 2, and you can stay on the second page. And do you see that CD 14 shows up on the second page?
A Yes.
Q Did you draw the lines for CD 14?
A Yes.
MR. CANTER: I'm going to hand to the court reporter what I'd like to mark as Exhibit 5 (sic), I believe.
(Deposition Exhibit 6 was marked for identification.)
Q BY MR. CANTER: Director Wright, this is another document which reflects on the left the benchmark CD 14?
A Uh-huh.
Q And on the right the enacted plan CD 14. Does that make sense?
A Yes.
Q Do you -- and I think you can also see this in Exhibit 2, but do you see the enacted CD 14 adds a little piece on the bottom southeast?

A I'm sorry, where?
Q On the bottom southeast.
A Yes.
Q And this bottom southeast addition includes the cities of Austell and Powder Springs?
A Yes.
Q Do you know that Austell and Powder Springs are both majority people of color cities?
A I do not know the specific demographics of those cities, but...
Q Would it -- does that make sense to you, I mean, based on your understanding of the demographics of that area?
A Sure.
Q Okay.
A But the cities themselves are not in their entirety the area that was taken in. They are just a portion of it.
Q There are -- I just want to understand what you said. There are other portions of this addition to CD 14 that are not Powder Springs and Austell?
A Correct.
Q The majority of the addition, though, are those two cities?
A I don't know what the population of the two

cities are in relation to the population of that entire area, but...

Q Okay. But at least --

A They are -- they are included in the area that was added into CD 14.

Q Right. They are certainly part of it. Okay.

Would you say that -- I'm going to call this just the addition, the southeast addition. Does that work?

A Sure.

Q Would you say that the southeast addition can be justified based off of compactness principles?

A Based off compactness principles, I don't think it makes a huge change in the shape of the district.

Q Okay.

A It's a small area.

Q Would you say that adding the southeast addition can be justified based off of respect for preserving communities of interest?

A In terms of keeping two cities wholly within that district, they were maintained and not divided into any other districts, so if you consider that a community, they were maintained in one district.

Q What about adding an urban community into a district that is primarily rural?

A I'm sure there are places on the map where that happens, but this decision to draw this in this area was above my -- my level.

Q Okay. Let's talk about that then.

A Go right ahead.

Q Why did this piece of CD 14, why did the southeast addition get added to CD 14?

A Sure. So the push from the south part, as we've talked about population wise, impacted the other districts that border up against it. So we already had removed Haralson County out of 14, and Pickens County also, as you know, had requested quite vocally to be wholly within one district and not be divided. So the decision was made then to push Pickens into a different district and keep it wholly together.

And there was still a need for District 14 then to have population. Because the size of District 13 is what -- it was not modified very much at all. It did lose part of Douglas County and a little bit of Cobb. That population needed to go elsewhere. And politically putting that area into District 11 was not beneficial to the performance, as you talked about, for District 11, so it was decided that it would go into 14. That area voted, I think around 60 percent democratic, so that was the reason that it was chosen to be pushed into 14.

Q That was a lot of information.
A There you go.
Q When was that -- when was the direction conveyed to you?
A That was part of that working session.
Q All right. Do you remember who conveyed that direction to you?
A I do not specifically. It was discussed.
Q And were all of those factors that you just brought up discussed?
A Yes. I think that was part of what led to -- to that idea.
Q I see. And I know you just said you don't recall who specifically made the direction, right?
A Right.
Q But did you have any sort of opinion about making this change?
A Well, I mean, I understood their justification for their -- that was the political goal that they had, and I work for them, so, you know, my opinions are not...
Q I -- okay. Though it seems like you might, in fact, have an opinion.
A Well, counties are -- larger counties are going to be split on these maps. We know that. And it is always better if you are going to split, split within a

larger county than to go and split another smaller county. So putting Pickens back together was definitely a decision I felt like was a good choice. They requested that. Let's do that. It made sense to the map, and it -- it fit into where everything else laid out.

This particular area, that was not my decision. They made that decision, and I do what I am told.

Q Okay. So you said that it made sense to keep Pickens whole?

A Yes.

Q Would it be fair to say that you didn't think it made sense to take this piece of Cobb?

A Well, no. I will say that it is -- when you are splitting and dividing between districts, larger counties are going to already be split. So rather than cause a county that is much smaller to have to have two different combinations, two different congressional districts, especially when they requested specifically to have that reversed from how it had been, putting that county back together was a more logical choice than including an additional split in another county that's already split.

Q You -- I think you just said that putting Pickens back together so that it's not split --

A Uh-huh.

Q -- was a logical choice if the consequence would be to split Cobb, which already was split?

A Correct.

Q So it was a good idea in this circumstance to split Cobb into four?

A There were the political justifications for why they chose to do that. That's the reasoning behind that split, why that was put into the 14th District.

Had they chosen a different route, that particular area, as I said, was a strongly democratic voting area, and putting that into the 11th District would have reduced the Republican numbers in the 11th District. The 14th District was a stronger Republican district, so therefore, adding that democratic area into a more Republican performing district was not going to make as big of an impact on the 14th as it would on the 11th.

Q And those were political considerations that you were -- that were conveyed to you?

A Well, yes, that was what the -- you can look at the numbers in the data and see.

Q But you're -- you're a demographer, right? Or you draw maps a lot, right?

A I've been called that, yes.

Q Yeah, yeah. Yeah, you draw maps a lot.

going off the video record.

(The deposition was at recess from 1:40 p.m. to 1:56 p.m.)

THE VIDEOGRAPHER: The time is 1:56. We are back on the video record.

MR. CANTER: I want to clarify for the record the exhibit numbers for the documents that I just showed during the last session.

Exhibit 5 will be the zoomed-in map of the area of Oxford, and Exhibit 6 will be the prior and enacted Congressional District 14 boundaries.

Q BY MR. CANTER: Director Wright, did you speak with your counsel about the contents of this deposition during the break?

A No.

Q Did you speak with anyone else about the contents of the deposition during the break?

A No.

Q Can you please go to the enacted Congressional map. It was Exhibit 2.

A 2.

Q And can you take a look at CD 13? We spoke a little bit about CD 13 before because you pointed out that an area around Douglasville had previously been in CD 3 and was added to CD 13. Is that correct?

A I think Douglas County had been wholly within 13.

Q Ah. So in the benchmark plan, Douglas County was wholly in 13?

A Correct.

Q In the September plan, a portion of it that didn't include Douglasville was added to 13; and then for the enacted, that portion that now includes Douglasville was added?

A That sounds correct. Yeah, it changed.

MR. CANTER: Okay. I'd like the court reporter to mark as Exhibit 7 another comparison of two districts. This time on the left we have the benchmark Congressional District 13, and on the right we have the enacted Congressional District 13.

Q BY MR. CANTER: Does that sound right to you, Director Wright?

A Yes. I haven't looked at it yet, but...

(Deposition Exhibit 7 was marked for identification.)

Q BY MR. CANTER: So yeah, take a second. Does that look right?

A That looks right.

Q Okay. Now, can you go to the population summary tables in Exhibit 2 and look at the data

reflecting the black population in CD 13.
Do you see where I'm looking?
A Yes.
Q It says that the black population is just under -- or just over 64 percent of CD 13; is that right?
A Yes.
Q Do you consider that CD 13 a packed district?
A No.
Q Why not?
A Packing usually is a higher percentage, in my mind, than 64 percent.
Q Okay. So am I understanding that the reason you think CD 13 isn't packed is because 64 percent black population isn't enough to constitute a pack?
A I don't know that I'd say isn't enough. But typically, when I have looked at things to question whether or not that was something that was packed, these numbers were significantly higher than 64 percent. We have a lot of districts on our House and Senate maps that are comparable to that number and note those are not -- we would not consider those to be packed districts either, so I would not consider that to be a packed.
Q If we can go back to the summary table. Right next to it is the Hispanic population for CD 13.
A Uh-huh.

Q And that's just over 12 percent.
A Yes.
Q Now, if you were to combine the black and Hispanic populations into a single minority coalition, that would equal about 76 percent Hispanic/black population in CD 13, right?
A Yes.
Q Would you consider 76 percent of a -- of a coalition population to be packing that coalition into the district?
A I have not usually combined race categories together to consider it a packing or not packing. From my experience, it's typically been one single race category.
Q Okay. Let's say it was one single race category.
A Uh-huh.
Q Would 76 percent of that group be considered a pack to you?
A It would be a high number. It might depend on what the circumstances were in the area surrounding that same area. I know that we have had some of our State House districts that have been around 70 percent of a single race category, which is high, but they are also surrounded by other districts that are equally as high.

A I have to think about it, but that's definitely one of the things --

Q Yeah.

A -- to look for and to look at.

Q Okay. Do you remember drawing -- do you remember drawing CD 13? I know we talked about a portion of drawing CD 13. Do you remember drawing CD 13?

A Not specifically in detail.

Q Were there any discussions during the working session about CD 13 in particular?

A I don't recall any.

Q Okay. You can put the document -- those documents to the side.

MR. CANTER: I'm going to hand to the court reporter what should be marked as Exhibit 8.

(Deposition Exhibit 8 was marked for identification.)

Q BY MR. CANTER: And Director Wright, this is the enacted Senate map, if you want to take a second to look at it.

Does this look right to you?

A Yes.

Q And we've already talked about this, but do you remember -- you drew this map?

A Yes.

A Who did I have these discussions --
Q Yes.
A -- with?
That would have been with Chairman Kennedy.
Q So did Chairman Kennedy convey Senator Strickland's position about SD 17 to you?
A I don't know that he conveyed a position about it.
Q Okay.
A I think the idea was to draw a district that would be a Republican district.
Q So Chairman Kennedy told you to draw a district that would allow Strickland to win?
A I don't know that it's -- it's hard to bring out explicit details of conversations because I don't know that he said that word for word --
Q Yeah, I understand.
A -- verbatim, but that was the understanding. I think for all the senators there was, you know, drawing a district that would allow any incumbent senator to continue to be reelected was something that they considered.
Q Was there any direction about how Chairman Kennedy wanted you to draw SD 17?
A I don't know if -- if I recall specific

just talking about. And the yellow dots are Latino citizens, the green dots are black citizens, and the blue dots are white citizens.

Do you agree that a lot of Latino citizens have been taken out of SD 17?

A It looks to me that there is a broad spectrum of population. There's a large area of blue. There's an area of orange mixed with green. There's an area here -- I mean, I wouldn't know exactly what that represented other than a variety of those different colors.

Q Okay. If we can just zoom out again.

So a lot of white citizens were added in the top right portion, and it was a mix of citizens that were taken out in the bottom left portion. So does it accord with your understanding of changes to SD 17 that the district has gotten whiter?

A I couldn't speak to the exact demographic breakdown of what it was to what it is. This was a -- as I mentioned, this district was about political improvement, and that is what the number -- that's the numbers that I was looking at for this particular district.

Q Specifics aside, does it generally accord with your understanding about changes to the composition of SD 17, that it's gotten whiter?

A That is what it appears to be on here.
Q If you can go to the population summary page on the -- this Senate district map. I don't remember what exhibit number this is.
A 8.
Q 8. Exhibit 8. Thank you.
And do you see that SD 17 has almost 57 percent white population?
A Yes.
Q Do you think that's a lot?
A 57?
Q Yeah.
A I don't know that that's sufficiently a lot.
Q Do you think that's enough to ensure that Senator Strickland can win an election?
A That wouldn't have been what I based that on. I would have looked at the political data to determine whether or not I thought it was a district that would win reelection for him.
Q What political data?
A The same political data we've looked at for all -- that we pull into the precincts, election data, election returns.
THE REPORTER: Wait. Say that again. Just start over.

THE WITNESS: The same political data that we have discussed that we brought in from the Secretary of State's Office that are election returns.

Q BY MR. CANTER: Do you recall whether you looked at data at the county level when determining how to draw the lines for SD 17?

A Can you say that one more time? I'm sorry.

Q Yeah. So do you recall whether you looked at data at the county level when deciding how to draw the lines for SD 17?

A Possibly. I know there is one whole county in the district, so we probably would have looked at county data there. The others we would have looked at probably precinct data because it's divided amongst different precincts.

Q Any other layers?

A What do you mean "other"?

Q Did you look at block level data?

A Possibly, if we had to look at splitting a precinct. I don't know if he has any split precincts in this district or not.

Q Okay. But you at least looked at precinct level data?

A Yes.

Q If you go back to Exhibit 8, do you see a bit

above SD 17, there is SD 48?
A Yes.
Q Did you draw SD 48?
A Yes.
Q Do you recall drawing SD 48?
A As a part of the map as a whole, yes. Specifically, no.
Q Do you remember having any discussions about SD 48?
A Not -- there were some, yes, but...
Q What were the discussions?
A So Senate District 48, there was a discussion about whether that district could be flipped from a Democratic seat to a Republican seat.
Q Do you know who had those discussions with you?
A Again, these discussions kind of happened in a -- not necessarily one on one. There might be a group discussion or things that had been discussed that are then brought to me. I don't have a specific conversation that I can recall.
Q Do you recall whether Senator Kennedy, Chairman Kennedy was part of any discussion about how to change the composition of SD 48?
A Yes.
Q Do you know who was the senator in SD 48 prior

Share another document, once it's ready. And this is going to be Exhibit 10 for the marking.

(Deposition Exhibit 10 was marked for identification.)

Q BY MR. CANTER: Just let me know when you see it, Director.

A I can see it.

Q Oh, great.

A It's far back.

Q So Director Wright, this is another map, like the last one. So the blue lines represent SD 48 in the benchmark plan, and the red lines represent SD 48 in the enacted plan.

Does that make sense?

A Yes.

Q All right. And it's the same description on the bottom where the dots represent the race of different citizens within the district.

Does that make sense?

A Yes.

Q Would you agree that a lot of white voters were added to SD 48?

A Yes.

Q Would you agree that a lot of Latino voters were taken out of SD 48?

A Yes. It would be helpful if there had been an overlay of the new Senate District 7, because most of that area is the new Senate District 7. So it actually created a new district, that portion. As everything again shifted upward, that's where the new district was placed. And it was -- if you look at Exhibit 8, you will see that on there, but it would have been helpful to have seen that overlay there as well.

Q Yeah. Yeah, I guess on page 2 -- it's a good point -- on page 2 of Exhibit 8, you can actually see a blowup of 48 and 7 --

A 7.

Q -- right under it?

A Yes.

Q So --

A So most of that area you are asking me about that is below the red line, and in that area where there is a large population of Latino and some Asian -- I can't see. I think there's green in there. I can't make it all out -- was part of the population that was used to create the new District 7 there. That is mostly -- that is all within Gwinnett, and there's an extremely diverse district there, as that other district pushes 48 northward.

Q Were you aware -- or, actually, let me ask

this. Was Chairman Kennedy aware that adding white voters to District 48 would cause Senator Au to lose?

A I don't believe we discussed adding white voters in an effort to cause her to lose. We discussed adding Republican voters in an effort to make that seat competitive.

Q Okay. And how did you seek to accomplish that?

A I'm sorry, can you --

Q Yeah, sure.

A -- rephrase that?

Q Yeah. How as the map drawer did you make changes to Senate District 48 to reflect the goal that Senator -- that Chairman Kennedy wanted?

A Right. So I think in the creation of District 7 first, once we were able to draw that district there, which we did, of course, take some of the population away from District 48 to fit that new district in Gwinnett, which is a very rapidly growing county, very diverse county, we created that new seat there, pushing 48 upward.

So that then caused us to make decisions about where do we push District 48, now that it will need to pick up population, and also to make it a more competitive political district. That we would have to go northward, and going northward into Forsyth County and

into that area, in the Sugar Hill area, those were some Republican voting areas that would create -- that make -- make District 48 a more competitive district.

Q It looks to me from Exhibit 10 like those are also -- on the screen, excuse me.

A Sorry.

Q No, no.

It looks to me like on Exhibit 10, that the northern areas added to Senate District 48 are also -- have a very large white population?

A Well, I don't create race density maps like this, and this is something I have not seen, so this is your analysis of it. That is not something we use or look at when we do this, so this is new to me to look at it like this.

Q Okay. Did you draw Senate District 48 while looking at the precinct level layer?

A Yes.

Q Did you also look at the block layer while drawing Senate District 48?

A I don't know that I would have looked at blocks. If I was able to draw that with whole precincts, I wouldn't have zoomed into the block layer. It's possible that I did in some of the Sugar Hill area. It looks like I followed the interstate there, so it's

Q Yeah. Okay.

And then Chairman Rich came and provided direction, either directly to you, or Chairman Rich spoke to other members of the House and they provided direction to you through Chairman Rich?

A Yes.

Q Am I missing anything about people who provided direction to you about how to draw this House district?

A I'm not sure what you mean.

Q Are there other people that directed you on how to draw the House plan that I haven't mentioned already?

A Counsel was involved in consulting on -- on the drawing of the maps as well.

Q Anyone else other than your counsel or those that I've mentioned?

A Not that I can recall.

Q When you are drawing at the House level, are you more often looking at the block layer?

A It would depend on which part of the state you were in. In the more rural parts of the state, as you can see on the map, the districts are larger --

Q Sure.

A -- and made up of whole counties. So in those cases, it's probably more county and precinct based in terms of what you use.

major features to split a district. It makes it easier. Street -- major interstate or a street or something.

Q Do you recall drawing House District 49?

A I recall working on House District 49.

Q What do you recall about it?

A There was discussion and work in that area of how to draw those districts there. I think we did draw a new district that's just below that, the 53rd.

Q The 53rd? I see that, yes.

A Uh-huh. That was an open seat, so trying to configure adding an open seat in that area between the other districts there, and also trying to make them politically competitive in that area.

Q Who was the elected official for House -- the area where House District 49 is before -- you know, under the benchmark plan?

A I believe that's Representative Chuck Martin.

Q Okay. Did you speak with Representative Martin about the composition of the new House District 49?

A I believe I did speak with him at some point.

Q What did he say?

A I don't remember specifically what he said.

Q Generally?

A I mean, of course, drawing a district that -- you know, and any member when you are at this level, you

are talking about the precinct level, they have precincts that they have connections to, whether it's family lives there, a school they went to, they have good support there, whatnot. So when you discuss those precincts, they want to make sure those precincts are in their district if possible.

Q Did you discuss with Chairman Rich the composition of HD 49?

A I would expect that she would have been present with conversations that were had in that area.

Q Why?

A She was usually present when we met with other members discussing the districts in certain regions.

Q Did the racial composition of HD 49 ever come up in discussions?

A I don't recall that coming up in discussions.

MR. CANTER: I'd like to -- I'd like to offer for marked Exhibit 12 another document on Exhibit Share.

(Deposition Exhibit 12 was marked for identification.)

Q BY MR. CANTER: So this is the same type of image, once you see it on the screen.

MR. DAVIS: Can you guys -- is it showing?

THE WITNESS: Yeah, I can see it. It's kind of far back, but if you zoom in, it might cut off.

MR. DAVIS: You want me to zoom in?

THE WITNESS: It may cut some -- okay. Yeah, that's good. That's good.

Q BY MR. CANTER: So the principles for this document are the same as the two that we see before. The blue lines reflect the benchmark of House District 49, and the red lines reflect the enacted House District 49.

Does that make sense?

A Remind me one more time. The blue is the old and the red is the new?

Q Yeah. Blue before. That's how I remember it.

A Blue before, there you go. Okay.

Q Do you agree that a lot of white people were added into HD 49?

A It does look to be that from your image.

Q Was a goal of Chairman Rich when drawing the districts in the House map to retain the core of a prior district?

A I think that was something that was considered. I don't know that that was something that was focused heavily upon. Sometimes that's easier in some areas than others, but it was not the -- not a top priority but something that was considered.

Q When you say it was considered, do you mean that it was considered as a factor to bake into the

drawing or as a factor not to bake into the drawing?

A So in a lot of the districts, it's easier to look at cores of districts where a previous district had been. From things we've heard, a lot of the people in the public hearings, you know, wanted to maintain consistent representation with the -- the representative or senator that they had had before, so we do try to consider, if we can try and draw a district in a similar way, to maintain as much of that as we could, but also knowing we have to make changes due to growth and population.

In this particular area, in the Metro area, we know there's been a ton of population growth, so that's going to involve, of course, in this case, adding a totally new district that had not been there before. I think we actually did that in Gwinnett as well. So in that same region, when you are adding new districts, there were open seats that -- yeah, well, that one I think didn't run again. But it does make a difference in trying to maintain, because the districts don't necessarily look the same anymore as they move due to that shifts in population. You can't just always keep them just as they were.

Q Do you think the new HD 49 retains the core of the benchmark HD 49?

A It retains some of its core. I mean, there's obviously overlap in this map. I don't know particulars on the value of how much that population is that was there before. Obviously, it's -- there's some, but it did shift.

Q Would you say -- when you said it retained some of the core, do you think -- would you say that it retains more than half or less than half of the core?

A That's speculation. I have no idea.

Q Okay. When drawing this district, do you recall whether you looked at precinct level data?

A Yes. I would most likely have been working with precincts.

Q Do you recall whether you also looked at block level data?

A I do not recall specifically looking at the block level. They do have some precinct boundaries that are a little unusual sometimes.

Q Yeah.

A So sometimes you do have to look at that, if they have non -- they have some noncontiguous pieces --

Q Yeah.

A -- of precincts up there, so you do have to look at it sometimes.

Q Yeah, if you don't mind, I'm going to try to

zoom in on a portion in the enacted, a little -- where it sort of looks like there's like a person pointing in the left direction --

A Uh-huh.

Q -- that's not part of the district. Do you see that?

A Yes.

Q Right.

Is that one of these areas that you mentioned that might be a little -- I think you said maybe a little noncontiguous, is how you put it?

A I don't know if that one is noncontiguous.

Q Yeah.

A That might be part of a city boundary there.

Q Okay.

A There's a little city of Mountain Park there. It could be a portion of that. It could be a city limit from one of the other cities. They do tend to follow the city limit boundaries for their precincts in that area, which tends to make them look a little more unusual.

Q Okay. Right now you're not sure whether that's -- that somewhat odd shape reflects a split county or a split precinct?

A I would expect that is a precinct boundary, because I wouldn't have drawn a split precinct that

1 looked like that.
2 Q Okay. Looking at this document -- and we can
3 zoom out if that's helpful -- do you see anywhere that
4 looks like a split precinct?
5 A Without the precincts, it's hard for me to
6 tell. They're on the exhibit, but it's hard to see
7 because it's not zoomed in very well either. So I can't
8 say for sure without having that.
9 Q We can put the Exhibit Share document away.
10 And if you can go to the Georgia House
11 District, which I think was marked as --
12 A 11.
13 Q -- 11, thank you. And again, on page 2, you
14 can see House District 104.
15 Do you see that?
16 A 104?
17 Q Yes, ma'am.
18 A Yes.
19 Q Do you remember drawing House District 104?
20 A Yes.
21 Q Who was the representative of that district?
22 A That would be Representative Chuck Efstration.
23 (Court reporter clarification.)
24 Q BY MR. CANTER: What did you and the
25 representative discuss -- did you discuss with the

representative about HD 104?

A I don't recall discussing it with him prior to -- well, I don't know when I discussed it with him. There was a time that I spoke with him. I don't recall if that was before or after the map was in a format that was presented. I don't remember when it was.

Q Did you speak with Chairman Rich about HD 104?

A Yes, I believe she would have been involved in those conversations.

Q Were there any conversations with Chairman Rich that didn't include Representative Efstration?

A Efstration. I couldn't say. I'm not sure.

Q What did you talk about in terms of the composition in drawing a new HD 104?

A I think that if -- in some capacity, I was told that 104, of course, they want to ensure that it maintains as -- oh, it got dark -- a Republican district, that an electable district for him, and that to draw that district into Barrow County would be the direction for that one to move, to pick up population. That would continue to maintain that district as a Republican district.

Q Just so I understand, were you directed to add Barrow County into HD 104?

A Again, you know, we've talked about this being

a collaborative thing. At some point in conversation I think that was mentioned. I don't remember being, you know, directly told do this and that was how it happened, but the discussion was there that taking it into Barrow County. And I think all of these districts kind of pushing out a little bit from where they had been because of the growth in the Metro area, especially in Gwinnett, them pushing outward is not -- that was sort of the side effect of the growth in the -- in the area anyway, that they were going to push out to some degree in some areas. And so that one pushing into Barrow to pick up Republican population that votes Republican to ensure that district to maintain.

Q Do you know the racial composition of sort of the middle of Barrow County?

A No, I do not.

Q And I appreciate you bringing this up. You've -- I agree we talked about it and you mentioned that sometimes you had conversations about how the composition of lines should be drawn.

Ultimately, did you always follow the directions of Chairman Rich or another member of the House when drawing the House lines?

A So making changes to the map would usually have been prompted by a discussion with Chairman Rich or

that area or how many people that is.

Q Is the inclusion of a large white population into 104 and the exclusion of a large Latino population out of 104 consistent with your understanding of how the new 104 was, in fact, drawn?

A Can you repeat that one more time?

Q Yeah. Is the inclusion of a large white population into 104 and the exclusion of a large Latino population out of 104 consistent with your understanding of how the new 104 was drawn?

A I don't recall having discussions about adding white population or removing Latino population. I think the political goal of this district was what the objective was, to push it into Barrow County.

I also know we added some new seats in Gwinnett that would have pushed that Latino population into districts where they would have been, you know, a large portion of those districts in that area as this district shifted outward. So the political objective, combined with new districts being drawn, I think that's the effect, and that's why this district is shaped like it is.

Q When you drew this district, were you looking at the precinct layer?

A Yes.

any block level changes when drawing HD 104?

A No, I don't recall whether I made any block level changes probably on a lot of these.

Q Okay.

A It's a lot.

Q You do know that you made some block level changes?

A I'm sure that I did in some places. Like I mentioned, you know, if there were block precincts that are noncontiguous, you are going to have block splits between those two, because you have to.

Cobb County is gonna have a lot of block level work because they have a lot of precinct split, noncontiguous pieces in islands in their precincts, so it's -- it's going to happen in certain places that I have to look at the blocks. But that is, again, I usually try to work with the precincts to avoid blocks and let that level of work, if I can avoid that.

Q Can you please take a look on page 2 of the House district document we are looking at right now of HD 48?

A Yes.

Q Do you recall drawing HD 48?

A Yes.

Q Who was the representative of HD 48?

A I -- I think that it was representative Mary Robichaux.

Q Did you ever speak with Representative Robichaux about the new composition of HD 48?

A No, I did not.

Q Did you ever speak with Representative Rich about HD 48 -- Chairman Rich, excuse me?

A Yes. I think this area was worked on all together. So we've talked about 49 and this whole area, so that would have been as a whole.

Q I believe when we talked about 49, you mentioned 53. What --

A Yes.

Q Can you elaborate on what you talked about with 48?

A I'm sorry, so 50 --

Q You talked -- when I asked about HD 49, I recall you talking about HD 53.

A Correct.

Q But now you are saying that you also, as part of the discussion, were looking at HD 48?

A So we don't draw districts in isolation one at a time. You are looking at, sometimes it's a county delegation as a whole. They all -- you kind of have to work as a group because when you make a change to one,

you are going to move another district. So when you reshape, push one district this way, you are going to have to fix that here. So you kind of work with all of them at the same time.

So this particular region would have been something that was looked at as a group, not one district at a time.

Q Were you directed to draw HD 48 in some way?

A No, I don't recall being told to draw 48 any particular way. I actually think that in working on some of the surrounding districts and then looking at the political breakdown afterwards, we -- I realized that it had then become a competitive district. That wasn't really the goal. It was the effect of working on the other area.

Q Can you take a look at HD 44, on page -- on the same page?

A I see it. It took me a minute, yes.

Q Yeah. Do you remember drawing HD 44?

A Yes.

Q Who was the representative of HD 44?

A I'm not certain.

Q Okay. That's fine.

A I think I know, but I don't want to misspeak, so I'm not gonna say.

Q I promise I won't get upset if you misspeak. Who do you think?

A There's a lot of members. We have 236, so I feel like I'm on the spot when you are asking me who is in every one of them.

Is that -- is that Don Parsons? Don Parsons.

Q I think that's right. I think that's right.

Did you speak with Representative Parsons about HD 44?

A I do not recall speaking with him, no.

Q Did you speak with Chairman Rich about HD 44?

A This would have been, again, part of an area discussion, the districts in that vicinity. So specifically that one district, I don't recall a conversation.

Q What were the -- in that area, what were your priorities? What were you directed to do about drawing the map?

A There is fairly large growth in that area around House District 35, and that's the college area. There's a school there, so there's a lot of growth in population. That school has really hugely grown in the last few years, so they've had a lot of change in the area there.

So in terms of -- that actually, I think, is a

change to the districts there, which push some of that population up into Cherokee as that district there was formed, 35. And talking about 35, 44, 22, 20, in that whole area.

MR. CANTER: I'd like to put up on Exhibit Share Exhibit 14.

Q BY MR. CANTER: And Director Wright, please let me know when you see it.

(Deposition Exhibit 14 was marked for identification.)

MR. DAVIS: It should be up there now.

THE WITNESS: It is. If you can zoom in some more.

Q BY MR. CANTER: You recall from before, this is another one of these maps where blue is before and red is after?

A Yes.

Q Does that sound good?

A Yes.

Q All right. And the dots -- the colors of the dots represents the same racial composition of the benchmark in enacted districts.

It looks -- would you agree that a large number of white voters -- white persons, excuse me, were added into HD 44?

A This one is hard to see. It looks to be a pretty disperse spread of different population in there, because there seems to be a fairly good bit of -- I think that's Hispanic population in there as well. It's kind of dispersed between.

Q Okay. Do you think that the new HD 44 retains the core of the old HD 44?

A As we said before, it retained some of the core.

Q Okay.

A I don't know how much. I'd have to, you know, do further digging to tell you how much of the core that it retains. It does have some. But again, this is another one of those everything expanding and pushing outward. This pushed into Cherokee County, and everything below is pushing the districts that way. So it did change. It does retain some of the core.

Q Did you ever have a discussion about a threshold of core retention that would be sort of satisfactory for the legislators or for anyone else?

A No.

Q So there is no notion of enough core retention?

A Not to my knowledge.

MR. CANTER: What time are we at?

THE VIDEOGRAPHER: We have been going one hour

Census data until the time when all three of the final maps were published, so the maps that ultimately were passed by Governor Kemp became public. So this is after you --

A Can I ask you to clarify what you mean by a "block equivalency file" to make sure we're on the same page?

Q Yeah. So it's a spreadsheet that request -- that reflects block data.

A Like block with a district assignment?

Q Correct.

A Okay. Just making sure we're talking about the same thing.

So during the process of the draft maps coming out and being made available, yes, I did receive requests for block equivalency files.

Q From whom?

A I know that Shalamar Parham asked for them. And there -- I don't know if there were other people who did, but those -- I know she communicated directly with me. So I don't know if there were others. There may have been, but I know she did.

Q Do you know why?

A Do I know why she wanted them?

Q Yeah.

A I figured she was going to re-create those in her software or their office. She worked for the House Democratic Caucus, so I figured that's what they would be using them for.

Q Did anyone else ask for block equivalency files?

A I don't recollect anyone else, but that could have gone to other staff as well.

Q Other staff you mean in the LCRO?

A Yes.

Q So Mr. Knight?

A It could have -- any requests would come through our office manager, and then she would hand them or give them to staff --

Q Okay.

A -- to handle.

Q So it could have gone to Mr. Knight?

A Could have.

Q Could have gone to Mr. O'Connor?

A Could have. I would think if it was an e-mailed request, it would have been provided already in the documents.

Q What do you mean by that? Sorry.

A The way the -- all the information that was discovery, all those documents, if there was a request

Q And when you answer that, is that just within the redistricting period or is that even after the maps were published?

A Even after. I mean, requests don't come to me and then to them, so they -- like I said, they come through our office manager. If someone asks for some information, it could have been fielded out to anyone in our office to provide the answer to that.

Q You mentioned that Ms. Shalamar?

A Shalamar Parham.

Q Yeah, Ms. Shalamar asked for block equivalency data?

A Yes.

Q Did you give it to her?

A Yes.

Q Did she have any follow-up questions?

A No.

Q Can you recall providing block equivalency data to anyone else?

A She's the only particular individual I recall providing that or asking for that file.

Q So generally, do you recall other people asking for block equivalency data?

A What is the distinction in the question?

Q Because you said particularly, and so I'm

A Well, as I mentioned earlier, the inclusion of an educational video, that was actually my idea. I wanted to provide the people who cared enough to come out to the public hearings the opportunity to learn a little bit about the process, rather than just come up and talk about things without knowing some of the detail or the reasons why we do this. So that video was a new feature to add.

I also -- I don't know if related to the hearings, per se, the Zoom platform is new. We didn't have that before. We have two public hearings on Zoom at this time. That was definitely not something we did ten years before. To allow people to not just watch but also participate from -- from that platform.

I think all of the public hearings were streamed at this time, and I don't know that they were in 2011. They may have been recorded, but I don't know that they were streamed to be able to watch it live as it was taking place. So that was new this time.

And the comment portal we had on the website was also a new feature at this time, to allow people to submit comments, and those comments are actually posted so that they were viewable throughout the whole process. I think the comment portal was left up until through the end of the year, even following the adoption of the maps.

And it actually might still be there now. I'm not even a hundred percent sure if it's still active, but it might be still active now, not to submit, but to at least review comments.

So all of those things were new in 2021 that we did not do or have the ability to do in 2011.

Q Do you recall if the special session timeline was similar in 2011 to 2021, the actual time in special session?

A 2011, the special session was in the summer. It was August, I believe. It was around maybe two, two and a half weeks. It was a relatively short time period. I mean, it was, like I said, in the summer. So 2021, we were in session. Maybe -- I don't know if it was exact. Maybe a little longer than that or around that time period, but it was in November as opposed to August, so much later in the year.

Q Okay. What was generally your role in the redistricting process in 2011?

A Similar to what it was this time. I worked on drawing those maps, worked with the legislators to draw the -- the statewide maps for the Senate and Congressional and a large portion of the House map in 2011.

Q Did you follow a similar process in drawing the

A Traditionally, we renumber the House plan following finalizing a map. And it follows a pattern from the top left, moving towards the bottom right, trying to, number one, if I can maintain the same district numbers that were there previously, that does help with a lot of things in the counties for the elections, and also for the members. But I renumber to try and keep delegations in similar numbering patterns and things like that as it moves through. It's not a perfect science, but that is traditionally what we do in the House.

Q So is it unusual for House District numbers to change for Georgia voters following a Census and a redraw of the maps?

A No, that's not unusual.

Q You talked to Mr. Canter a little bit about the political data that you had available and the process of, I guess, disaggregating or imputing that data to blocks.

Do you recall that?

A Yes.

Q And so is it correct then that if you were looking at Census block data, each Census block has political data in it even though it's an estimate, right?

A Right. As you move blocks, you would see a change in not just demographic data but also in political

data as you move those blocks.

Q And when drawing the maps, you talked about different meetings with groups. Let's start with the -- the Senate groups that you met with. Was the political data for each district an important consideration for the members when they were drawing the maps?

A Yes.

Q And for the House maps, was that also -- was political data also an important consideration?

A Yes.

Q And for the congressional maps in that leadership meeting, was political data an important consideration?

A Yes.

Q Mr. Canter talked with you about the -- the different factors of redistricting that the committee adopted.

Do you recall that?

A Yes.

Q Can you just describe briefly, as a map drawer, how do you go about trying to balance -- because I'm assuming there is a competing interest between a lot of those different factors. How do you go about approaching balancing those different factors?

A It's very difficult, and in certain situations

you may have to give on one factor to accommodate another factor. For instance, maybe population requires that I have to divide a county because I can't fit this entire county into this district as it is, and the -- and the district nearby needs additional population. So although I would prefer to keep that county whole and intact, I might have to divide it so that the population is balanced between the two.

But it is a give and take. There is not a specific method or rhyme or reason as to how you choose what takes precedence in any given situation. And sometimes that's driven by what the legislator is asking for.

Q And so it becomes, at some level, a policy decision of which one the legislator wants to prioritize in that situation?

A Yes, it can.

Q Mr. Canter talked with you about using the different racial data available to you, and Maptitude will allow you to color a district by the racial makeup of the population; is that right?

A Can you say that one more time?

Q Yeah. Let me ask it this way.

Does Maptitude allow you to color different parts of the district by the racial makeup of the

population in that area?

A You could create a theme that would do that, I think using the data, whatever field you selected, and -- and setting a theme that way, yes, you could.

Q In drawing the House, Senate, and Congressional plans, did you ever use a theme of racial coloring on a map?

A No, I did not.

Q We talked a little bit, too, about discussions with the House Democratic Caucus. Did you meet with members of the Democratic party and work on redistricting maps for members of the Democratic party in the 2021 cycle?

A Yes.

Q And so those legislators had equal access to your office if they wanted to come in and draw a map?

A Yes.

Q And do you recall ever receiving a request from the House or Senate Democratic Caucus that your office was not -- did not respond to and provide information in response to?

A Are you asking -- can you say that one more time?

Q Sure. So you mentioned Shalamar -- and I'm forgetting her last name.