EXHIBIT I

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

Georgia State Conference of the NAACP; Georgia Collation for the People's Agenda, Inc; Galeo Latino Community Development Fund, Inc.,

Plaintiffs,

vs.

CIVIL ACTION FILE NO. 1:21-CV-5338-ELB-SCJ-SDG

STATE OF GEORGIA; BRIAN KEMP, IN HIS OFFICIAL CAPACITY AS THE GOVERNOR OF THE STATE OF Georgia; Brad Raffensperger, in his official capacity as the secretary of State of Georgia,

Defendants.

VIDEOTAPED HYBRID ZOOM
30(b)(6) and 30(b)(1)
DEPOSITION OF
BONNIE RICH
January 18, 2023
9:11 A.M.

18 Capitol Square SW
Atlanta, Georgia

Lee Ann Barnes (via Zoom), CCR-1852B, RPR, CRR, CRC

Q. How would you characterize them?
A. Oh, suburban.
Q. Suburban?
A. Yes.
Q. Okay. And how would you characterize the areas of North Fulton and East Cobb County?
A. Suburban.
Q. So would you say that -- would you say those are relatively similar -- have relatively similar characteristics to the districts that were added?
A. Yes.
Q. Okay. We're going to take a minute to look at another map of Congressional District 14. Just give me a moment.
(Plaintiffs' Exhibit 10 was marked for identification.)
BY MR. MELLMAN:
Q. This is has also been introduced in the Dugan deposition. We can just mark it as Exhibit 10.
Do you recognize this map?
A. I -- I recognize that it's titled "Prior Congressional District 14 and S.B.~2EX Congressional District 14."

Q. And how would you characterize the former Congressional District 14?
A. I'm sorry. What do you mean?
Q. Urban? Suburban? Rural? Exurban?
A. I'm -- I'm not familiar with this area like I am 6 because I don't live down here and I never have. It's my understanding it's very rural in the area, but I don't really -- I don't really have personal knowledge of that area the way that I do the other one.
Q. Are you aware that the primary industries there are agricultural and manufacturing?
A. I am not but that would not surprise me.
Q. Okay. And the -- looking down at the bottom there, the portion of Cobb County that was added, are you familiar with the general characteristics of that area?
A. Generally, yes.
Q. Would you characterize that area as rural?
A. No.
Q. How would you characterize it?
A. Cobb County?
Q. (Nodded head.)
A. It -- it's suburban.
Q. Would you say it's part of the metro

Atlanta area?

A. Yeah, I would say that.

Q. Do you believe that there are communities of interest between that portion of Cobb County that was added and the prior Congressional District 14?

A. So the portion that's beside Paulding County, I really -- I -- I don't know the area. So I really wouldn't know. I would assume that because it's right there, it would be pretty similar to the Paulding County area that it butts up against. But I don't really know that.

Q. Are you aware that District 14 is Marjorie Taylor Greene's district?

A. Yes.

Q. And so are you aware of any of the various demographics of the former Congressional District 14 versus the current Congressional District 14?

A. I don't know the differences. I would assume that they're both conservative, Republican leaning. I don't really know.

Q. Including the portion of Cobb County that was added?

A. I really don't know.

Q. Are you aware that the portions of Cobb County that were added included Austell and Powder

Springs?

A. No.

Q. Are you familiar with those names?

A. I -- I've heard of them, but I'm not familiar with the specific parts of Cobb County. I just know it as a whole.

Q. So are you aware that Austell has a mostly high black population?

A. I don't -- I don't know that specifically.

Q. The same for Powder Springs?

A. Right. I don't know that. I believe you if you say it is.

Q. What about the racial demographics of the various parts of the district that were moved?

So that would be Haralson County and part of Pickens County.

A. I -- I really -- I really don't know. I just remember that Pickens County wanted to be whole. I do remember that.

Q. Would you be surprised to learn that the percentage of non-white people in District 14 increased with the new map?

A. No.

Q. You would not be surprised?

A. No.

Q. Why not?
A. Well, I think that the percentage of non-white people for the whole state increased.
Q. And would that have been smoothly across the whole state?
A. I -- I doubt that.
Q. Do you recall receiving any public comments or feedback from the residents of the -- from the residents of the part of Cobb County that was added to Congressional District 14?
A. Yes, I do.
Q. And what was the tenor of that feedback?
A. Yeah. They -- they did not want to be included there.
Q. And can you discuss why the decision would be made to include them anyway?
A. I really -- you know, I can't say specifically. I know that there were a lot of factors that went into this map and we tried to please as many people as possible, but never -- you're never going to please everybody. There will always be people who are not happy. So I -- I would assume that the reason that the map exists the way it is is because it needed to to comply with the legal standards and the redistricting guidelines.

Q. And would you have made the decision on whether to include that piece of Cobb County?

A. No. It was part of the map. Like, it was not -- you know, it wasn't anything that -- that we discussed changing. So I would say that that decision was probably made by the map drawer and then we did just -- we approved it when we -- when we looked at the map.

Q. "We" being you and counsel?

A. The committee, and yeah, counsel. Yeah.

Q. Did you conduct any sort of analysis to determine the propriety of the map?

A. Beyond hiring counsel to review it?

Q. (Nodded head.)

A. No.

Q. Do you recall receiving any comments or feedback from the residents of the existing Congressional District 14 about the prospect of adding parts of Cobb County?

A. I -- I don't remember. There may have been. There may have been people who complained about that.

Q. Do you recall the tenor of any of those complaints?

A. Well, if -- if somebody did complain, they

just wouldn't have wanted it. But I -- I -- I don't -- I don't have a specific recollection who it may have been. It's been over a year ago. There were a lot of, you know, people testifying in these hearings.

Q. Okay. Do you recall why they would not have wanted that part of Cobb County as part of their district?

A. No, I don't.

Q. Can you look back again at the -- the email attachment that we just looked at?

On the last page with respect to Congressional District 11, you write "Responded to the overwhelming public input with respect to Pickens County and made it whole."

A. Yes.

Q. And we discussed that before as well?

A. Yes.

Q. And then just above that for Congressional District 14 you write "Maintained this core district; needed to gain population, so it geographically moved south, where we had population growth."

A. Yes.

Q. And if you take a look at the map, why

didn't you make Pickens whole if you needed to add population growth?

Why didn't you make Pickens whole by adding all of Pickens to Congressional District 14?

A. I -- I really couldn't answer that. I'm not a map drawer. This was something that was an issue because of a mountain range that divided and made things difficult there, is what I seem to recall. But I -- I'm not the map drawer so I couldn't really answer that.

Q. Do you recall if anyone suggested incorporating all of Pickens County into Congressional District 14?

A. Who? Like -- like the public?

Q. A legislator. A map drawer.

A. No, I don't.

Q. Okay. I'm going to show -- I'm going to show you another document which I'm going to mark as Exhibit 11.

(Plaintiffs' Exhibit 11 was marked for identification.)

BY MR. MELLMAN:

Q. And it begins with a Bates Number LEGIS00003224.

And can you take a look at this email?

Q. (Nodded head.)
A. I really don't. I -- I really don't.
Q. Do you have an understanding of why she was critical of the redistricting decisions related to Congressional District 14?
A. I don't. I don't -- I don't follow her rationale or logic. I don't understand it.
Q. Do you have an understanding of why any residents of Congressional District 14 were displeased with the redistricting process?
A. I wouldn't -- I wouldn't know except for whatever they said in the meeting, and I -- I don't remember that, sitting here today.
Q. I'm going to ask you now about some of the specific districts -- some of the specific House districts.
So the map, if you flip to the subsequent pages, there's some zoomed-in portions, and I'll just ask you to answer to -- to the best of your ability about each particular district.
So for House District 44, do you see where that is? It's --
A. No.
Q. -- in the top left. It splits between the -- the second big box down there.

A. Oh, is it on a blowup?
Q. Yeah. On the second page --
A. Oh, okay.
Q. -- Metro Atlanta area.
A. I see 43 and 45. Oh, there's 44, yes.
Q. And are you generally familiar with House District 44?
A. No.
Q. Okay. Can you explain when a factors you considered in redrawing House District 44?
A. None other than the ones that I've already told you about.
Q. Are you aware of whether the district core was maintained from the 2010 map?
A. I don't recall.
Q. Are you aware of the racial demographic -- demographics of the old HD44?
A. Not sitting here.
Q. Or would you have been at the time?
A. I may not have been. I -- I -- I don't -- I -- I don't recall looking -- I know for a fact I didn't look at every district, and I don't recall if I looked at that one or not.
Q. For the districts that you looked at, would you have looked at the racial demographics?

A. The information -- if -- if we clicked on the district, it would have popped up and, you know, that would have been something, you know, when we would try to make a change that was requested, it may have altered it so extreme that, for example, you know, a voting rights district went down to, you know, nothing. No -- no black population or very low. So we're, like, well, we can't do that.

So to that extent, I would have, but I -- I really wasn't the one using those figures to draw the maps. Those would just pop up when we were trying to tweak it.

Q. And when you say you -- you didn't look at every district, for the districts you did look at, what does it mean to you to look at them?

A. Meaning the districts where we tried to change something that somebody -- that a legislator had -- had requested.

Q. And in drawing this district and the districts in general, we talked about did you value keeping counties whole?

A. That was one of the redistricting guidelines.

Q. Do you recall why it would have been sacrificed in this particular situation?

A. I don't recall in this particular situation, but given the fact that we have as many counties as we do, that was inevitable, to have to split them.

Q. Okay. What about -- what about House District 48?

A. I see it here.

Q. Was that one of the districts that you looked at?

A. I would not be able to say.

Q. Do you know if the district core was maintained from the 2010 map?

A. I have no idea looking at this now.

Q. Are you aware of the racial demographics of the old HD48?

A. No. I -- I'm not going to be able to answer any questions like that.

Q. Okay. Or the new HD48?

A. No.

Q. And so when you were looking at a particular district, you were able to click on it and view the racial data for that district?

A. I couldn't. I didn't have access to that software. But when I was with Gina or Brian in the apportionment office, if they clicked on a district,

then they could make that information populate. And they would do that to look at it themselves because they knew that they needed to consider that for whatever changes we were trying to make.

Q. And you were in the office at times when they were clicking on particular districts and looking at that data?

A. Yes.

Q. And if they were making tweaks, you could look at that data before and after the tweak?

A. Yes.

Q. I'm just going to ask you about a few more districts. If you don't know the answer, that's okay. I'm going to ask the questions.

Go look now at House District 49.

A. Okay.

Q. Do you recall looking at that district?

A. I don't.

Q. Can you explain any factors you considered in redrawing that district?

A. We would have -- we would have asked the Reapportionment Office, our lawyers to apply the guidelines and the law. That's all I can tell you.

Q. Do you know if the district core was maintained from the 2010 map?

A. I can't say, sitting here today.
Q. Are you aware of the racial demographics of the old HD49?
A. I don't know.
Q. What about the new HD49?
A. I don't know.
Q. HD52?
A. Okay. I see it.
Q. Do you recall reviewing that district?
A. No.
Q. Are you aware of what factors would have been considered in redrawing that district?
A. The same as all of the other ones.
Q. Was -- are you aware of whether the district core was maintained from the 2010 map?
A. I don't remember.
Q. Are you aware of the racial demographics of the old HD52?
A. No.
Q. Or new HD52.
A. No.
Q. Last one.
HD104?
A. Okay.
Q. And do you recall looking at that

district?

A. Not specifically.

Q. Are you aware of what factors were considered in redrawing that district?

A. The -- the same factors as all of the others.

Q. Are you aware of whether the district core was maintained from the 2010 map?

A. I don't remember, sitting here today.

Q. Are you aware of the racial demographics of the old HD104?

A. There is no way I could ever remember that.

Q. Or the new HD104?

A. No.

Q. And so are there particular districts you do remember looking at?

A. I don't have specific recollection. It's -- it's hard to do that by the numbers, you know, and they don't stay the same after redistricting. So it's virtually impossible.

Q. Were there specific areas or -- of the state or districts that you recall specifically tweaking or working on?

A. I -- I would have for -- representatives

with whom I met who made requests who had not already, in just the -- the drawing by the Reapportionment Office, who had not gotten something they asked for, we would have pulled them up. And we did. I think we gave every -- almost every member who met with me something they asked for, if not every member. And sometimes more than what they -- the one thing.

So I just don't recall what they were because I -- my memory is just -- does not work like that. I just can't remember the -- the district numbers that way.

Q. And so you mentioned earlier that you spoke with about roughly 100 legislators and got requests regarding their district?

A. Yes.

Q. Do you recall how many of those were accommodated in the initial draft and how many tweaks needed to be made for?

A. I don't recall specifically. I do know that we -- I opened the file for every single legislator, and we looked -- so we did look at every single district, now that I'm thinking about how we did it. And if we looked at it and we felt like they got something that they asked for, we closed

A. I did.
Q. And I believe you said earlier, the Democratic members except for a handful of them didn't show up for meetings or try to meet with you.
A. Correct.
Q. And there was a portal that was made to receive public comments as well?
A. Yes, that's correct.
Q. And you received, I guess, hundreds of comments at that portal?
A. I think at last count it was in the 900s and I thought it went over 1,000.
Q. And all those were made available to members to review; right?
A. Yes.
Q. And you -- you reviewed those comments, as you said?
A. Yes, I did.
Q. And we had some discussion about the education data the committees hold.
Do you recall inviting a variety of different groups interested in redistricting?
A. I did.
Q. In both political parties?
A. Yes, both parties.

Q. And the National Conference of State Legislatures?
A. That is correct.
Q. And the guidelines for the committee were adopted after that educational process; is that right?
A. That is correct.
Q. In the map drawing process, I know you talked about you primarily did that in the Reapportionment Office with Ms. Wright or with Mr. Knight; right?
A. Correct.
Q. Was political data generally displayed as you looked at different districts?
A. The political data, if you mean the election results, yes.
Q. And so it's fair to say you were aware of the partisan impact of district lines and you looked at various drafts?
A. Yes.
Q. When you held the committee meetings during the special session, did you generally receive public comment at those meetings as well?
A. I -- I did not at the very first meeting where Leader Beverly and I both presented our maps