

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF) No.
NAACP, et al.,) 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

1 Q In September?

2 A No.

3 Q In October?

4 A Possibly. October sounds -- maybe.

5 Q Late October?

6 A It had to be in that time window because it's a
7 narrow time window, so maybe October.

8 Q Late October?

9 A I couldn't say specifically.

10 Q Do you recall if it was closer to when the
11 September 27th map was made public or was it closer to
12 when the ultimately enacted map was made public?

13 A I don't think it was close to the
14 September time frame, but I don't know exactly the date.

15 Q Do you remember, what did you guys talk about?

16 A The Congressional map.

17 Q Who was at the meeting?

18 A The -- the names I gave you previously.

19 Q So just to be clear, you had a meeting with --
20 about the Congressional map at some time closer to the
21 enacted map's publication with Chairmans Kennedy, Rich,
22 Mr. Tyson, Speaker Ralston, Lieutenant Governor Duncan,
23 and staff of the Speaker and Lieutenant Governor?

24 A That's correct.

25 Q Do you remember how many staff?

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

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

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

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

12 A Yes.

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

15 A Yes.

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

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

20 Q It was a working session?

21 A Yes.

22 Q And changes were made?

23 A Yes.

24 Q At the direction of Chairman Ralston?

25 A Speaker Ralston?

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

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

6 Q Somebody on the other side of the Zoom --

7 A Uh-huh.

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

10 A Yes. We would try different scenarios.

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

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

17 Q I see.

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

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

23 A Yes.

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

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

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

5 Q Okay. And you know how to use Maptitude?

6 A Yes.

7 Q Was data projected onto the screen?

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

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

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

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

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

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

24 A Correct.

25 Q Was data related to the race of the populations

1 projected onto the screen?

2 A It could have been sometimes.

3 Q Most of the time?

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

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

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

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

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

17 A Can you explain what you mean by that?

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

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

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

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

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

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

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

12 A Yes.

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

16 A Yes.

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

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

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

8 Q But you weren't involved in those meetings?

9 A I was not.

10 Q Was anyone in your office involved in those
11 meetings?

12 A No.

13 Q You just knew they existed?

14 A Right.

15 Q Would Chairman Rich mention them to you?

16 A Yes.

17 Q Sometimes specific meetings?

18 A Maybe.

19 Q Yeah.

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

22 A I'm -- whatever.

23 THE WITNESS: Patrick?

24 MR. JAUGSTETTER: Sure.

25 MR. CANTER: Thank you.

1 recommended to add to 6 on that.

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

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

5 Q Oh, I see.

6 A It was in the documents somewhere.

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

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

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

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

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

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

21 Q Politically electable for whom?

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

24 Q How was that information conveyed to you?

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

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

2 Q Sorry. Sorry.

3 A I don't --

4 Q That question --

5 A -- have a specific --

6 Q Yeah.

7 A -- moment.

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

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

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

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

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

1 Q So is there racial data at the block level?

2 A Yes.

3 Q All right. Is there any other type of demo --
4 data at the block level?

5 A So when we build our precinct layer, we do
6 allocate the election data to the block level, so we have
7 that political data at that level. It's estimating,
8 based on the demographics in there, based on registered
9 voter demographics kind of corresponds the two and
10 allocates down to that level. So we do have estimate
11 political data at the block level when we do this.

12 Q When you are drawing a map and you are looking
13 at the block level --

14 A Uh-huh.

15 Q -- is data reflected on the screen?

16 A Yes.

17 Q And is the estimated election data on the
18 screen with the other data?

19 A Yes.

20 Q You agree that the line we're looking at here
21 splits through the precinct, right?

22 A At the time, Newton County was considering
23 precinct changes. We were working with several -- their
24 elections office, and we had a draft precinct layer that
25 they were considering, so it's possible that I referred

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

3 A Correct.

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

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

9 Had they chosen a different route, that
10 particular area, as I said, was a strongly democratic
11 voting area, and putting that into the 11th District
12 would have reduced the Republican numbers in the 11th
13 District. The 14th District was a stronger Republican
14 district, so therefore, adding that democratic area into
15 a more Republican performing district was not going to
16 make as big of an impact on the 14th as it would on the
17 11th.

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

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

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

24 A I've been called that, yes.

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

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

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

15 I think all of the public hearings were
16 streamed at this time, and I don't know that they were in
17 2011. They may have been recorded, but I don't know that
18 they were streamed to be able to watch it live as it was
19 taking place. So that was new this time.

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

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

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

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

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

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

20 A Similar to what it was this time. I worked on
21 drawing those maps, worked with the legislators to draw
22 the -- the statewide maps for the Senate and
23 Congressional and a large portion of the House map in
24 2011.

25 Q Did you follow a similar process in drawing the

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

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

15 A No, that's not unusual.

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

19 Do you recall that?

20 A Yes.

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

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

1 data as you move those blocks.

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

7 A Yes.

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

10 A Yes.

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

14 A Yes.

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

18 Do you recall that?

19 A Yes.

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

25 A It's very difficult, and in certain situations