

EXHIBIT N

2/23/2023

Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

Dr. John Alford

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

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

vs.

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

Defendants.

Civil Action No.

2:21-CV-05449-SCJ

ANNIE LOIS GRANT, et al.,

Plaintiffs,

vs.

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

Defendants.

Civil Action No.

1:22-CV-00122-SCJ

Videotaped deposition of DR. JOHN ALFORD, taken
remotely in the above-captioned cause, before
Rachel F. Gard, CSR, RPR, CRR, commencing at
the hour of 11:00 a.m. Eastern on Thursday,
February 23, 2023.

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1 Dr. Palmer's expert report?

2 A It certainly -- I think it certainly goes
3 to some part of my discussion of Dr. Palmer's
4 report, but I would say it is primarily as a sort
5 of adjunct to the discussion of primaries in
6 Dr. Handley's report.

7 Q Okay. So in terms of your analysis of
8 Dr. Palmer's findings and conclusions, you
9 primarily relied on the analysis and data that he
10 himself provided in his report; Is that fair?

11 A So that's correct. But I'm also making
12 the point that because he has no primary analysis,
13 we really don't have anything other than the
14 general election setting to look at. And so I
15 think that's important to understand what we know
16 in that setting, although it's not in his report,
17 we can get that from, you know, sort of
18 comparable -- for time frame that's comparable
19 from Dr. Handley's report and my analysis of the
20 Republican primary, but it's not analysis that's
21 in my report as sort of checking his analysis,
22 something like that, because it's not analysis

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1 that he does in his report.

2 Q Okay. So earlier you had mentioned that
3 in preparation for working on this case, you --
4 I'm not sure if you said, used the verb
5 "downloaded," but you procured more updated
6 election data as you -- in preparation for your
7 work in this case. Do you recall saying something
8 to that effect?

9 A Yes.

10 Q And then here, though, you specify that
11 you relied on the election and demographic data
12 provided by Dr. Palmer and Dr. Handley other than
13 the 2022 Republican primary data; is that right?

14 A That's correct.

15 Q So I guess my question is: Did you, in
16 your response to Dr. Palmer's report in
17 particular, did you utilize any data other than
18 the data that Dr. Palmer himself relied on
19 preparing his report?

20 A No.

21 Q Okay.

22 A The purpose of kind of preloading some of

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1 black candidate, they could be elected. So if
2 blacks prefer to be elected -- or represented by a
3 black, the Voting Rights Act provided a mechanism
4 so that can happen rather than that choice always
5 being blocked.

6 Somebody someplace said this, that blacks
7 can have any candidates they want, as long as that
8 candidate was white. That was true throughout the
9 south, right. You could have any candidate you
10 wanted as black voters as long as the candidate
11 was white.

12 That's what we're trying to address here,
13 provide an equal footing in which if black voters
14 prefer a black candidate, they can elect that
15 candidate rather than just electing a white
16 candidate. So I just think that's a fundamental
17 question.

18 And what this data shows is that, it is
19 the case that black candidates that are supported
20 by black voters face exactly the same or produce
21 exactly the same voting pattern as do white
22 candidates favored by black voters. And so that's