

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

Page 1

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

COAKLEY PENDERGRASS, et al.,)
)
Plaintiff,)
)
vs.) CIVIL ACTION FILE
) NO. 1:21-CV-05339-SCJ
BRAD RAFFENSPERGER, et al.,)
)
Defendants.)
_____)

Deposition of Ojuan Glaze

December 14, 2022

10:08 a.m.

Remote via Zoom technology

Reported by: Carla J. Hopson, RPR, CCR-1816

I N D E X

EXHIBITS (For the Plaintiff) Page

Exhibit 1 Deposition Notice 5

E X A M I N A T I O N S

Examination

(By Ms. LaRoss) 4

1 APPEARANCES OF COUNSEL:

2 On Behalf of the Plaintiffs:

3 MICHAEL B. JONES, ESQUIRE

Elias Law Group

4 250 Massachusetts Avenue, NW, Suite 400

Washington, DC 20001-5825

5 Email: mjones@elias.law

Phone: (202) 968-4490

6
7 On Behalf of the Defendants:

8 DIANE F. LaROSS, ESQUIRE

Taylor English Duma, LLP

9 1600 Parkwood Circle, Suite 200

Atlanta, Georgia 30339

10 Email: dlaross@taylorenghish.com

Phone: (678) 336-7228

* * * * *

THEREUPON,

OJUAN GLAZE,

having been first duly sworn, was examined and
testified upon his oath as follows:

EXAMINATION

Q (By Ms. LaRoss) Mr. Glaze, good morning.

A Good morning.

Q My name is Diane LaRoss. Good morning.

And I represent the state defendants in this case.

So I'm just going to do a little bit of an
introductory couple of remarks, and -- just to start
out.

MS. LaROSS: So this will be the
deposition of --

Now, how do I pronounce your first name,
please?

THE WITNESS: It's Ojuan.

MS. LaROSS: Ojuan.

THE WITNESS: Yes.

MS. LaROSS: Just as it's spelled. I
didn't want to get it wrong.

Okay. I'll start over. So this will be
the deposition of Ojuan Glaze taken by
defendants, the Secretary of State

1 Raffensperger, and members of the state
2 election board.

3 And the deposition is taken for purposes
4 of discovery and all purposes allowable under
5 the Federal Rules of Civil Procedure.

6 The deposition is taken by notice and
7 agreement of counsel. And Counsel has agreed
8 that we're going to attach the notice to your
9 deposition as part of the deposition. And
10 since I've having some technical difficulties,
11 I can't quite share my screen with you, Mr.
12 Glaze. He's -- you know, he's graciously
13 agreed to allow us to attach that.

14 (Exhibit No. 1 was identified.)

15 And you'll see it in the transcript.
16 And if you guys have any objection, just let me
17 know.

18 And then if I -- I also need to add that
19 all objections today during the deposition
20 except those going to the form of the question
21 and responsiveness of the answer shall be
22 reserved until trial or first use of the
23 deposition as long as that's okay with counsel.

24 MR. JONES: It is.

25 MS. LaROSS: And, Mike, how did you want

1 to handle reading and signing?

2 MR. JONES: We'll review and then sign.

3 Q (By Ms. LaRoss) Okay. All right. So Mr.
4 Glaze, I'm going to go over just some general
5 guidelines for today's testimony. As you know, I
6 represent the defendant, the Secretary of State and
7 the state election board, who you've sued in the
8 matter that we're here about today.

9 All of my questions I -- it is not -- in
10 all of my questions it's not my intent to confuse
11 you in any way. So if I ask a question that you
12 don't understand, can we agree that you will let me
13 know that and then I'll clarify my question for you?

14 A Okay.

15 Q Okay. The only thing, too, is
16 particularly on a zoom setting -- and it is this way
17 in all depositions, but particularly on zoom. It's
18 really important that we speak one at a time.

19 So if you could just let me finish my
20 question before you begin your answer, that way then
21 the court reporter can be ensured that she'll get a
22 clear transcript of all that you say and all that's
23 said during the deposition today. Is that
24 agreeable?

25 A Agreed.

1 Q Okay. And also, you will need to
2 respond verbally. If you would, again, so that the
3 record can be transcribed clearly and -- rather than
4 an uh-huh or, you know, nod, head shake. Those
5 kinds of things are difficult to make part of the
6 record.

7 So it's best if you respond verbally.
8 Is that also agreeable to you?

9 A Agreed.

10 Q Thank you.

11 And certainly at any time during the
12 deposition if you would like to take a break, that's
13 entirely fine. I would just simply ask that you
14 complete your answer to whatever question is pending
15 at the time, and then we can go ahead and take a
16 break.

17 Is that also agreeable to you?

18 A That's agreeable.

19 Q Thank you.

20 And the -- I also ask that you turn off
21 your cellphone and not have any electronic devices
22 on during the deposition. Obviously you need to be
23 on zoom and on your computer in this setting. But I
24 would ask that you turn off your cellphone or
25 other email, text messaging, social media, that kind

1 of thing.

2 Is that agreeable to you as well?

3 A That's agreeable.

4 Q Okay. Thank you, Mr. Glaze.

5 Mr. Glaze, have you ever given a
6 deposition before?

7 A No.

8 Q Have you ever testified in court?

9 A No.

10 Q Have you taken any medications that
11 would keep you from fully and truthfully
12 participating in today's deposition?

13 A No.

14 Q Do you have any medical conditions that
15 might prevent you from fully and truthfully
16 participating in today's deposition?

17 A No.

18 Q Have you been involved as a party to any
19 other lawsuit besides the one we're here about
20 today?

21 A No.

22 Q Any family members involved in any prior
23 lawsuits that are related to election cases?

24 A No.

25 Q Have you or any family members ever made

1 any claim related to election matters at any time,
2 again, for your -- other than the lawsuit we're here
3 about today?

4 A Like a legal claim?

5 Q Yes, sir.

6 A No.

7 Q Have you ever been charged with a crime?

8 A No.

9 Q So then I would understand you have --
10 so then you've not been arrested. Would that be
11 correct?

12 A That's correct.

13 Q Have you discussed this case with anyone
14 other than your lawyer?

15 A No.

16 Q Have you discussed the deposition with
17 anyone other than your lawyer?

18 A No.

19 Q In preparing for today's deposition did
20 you review anything?

21 A I took a look over the complaint.

22 Q Did you review any other documents to
23 prepare for today's deposition?

24 A No.

25 Q Do you have any notes or memos or other

1 document that relate in any way to this case?

2 A Repeat the question.

3 Q Sure. Do you have any notes or
4 memorandum or other documents that relate in any way
5 to this case? And that would be other than what's
6 been provided to you by your attorneys.

7 A Okay. No.

8 Q And where are you located today giving
9 your deposition?

10 A I am in -- I am in Douglasville,
11 Georgia.

12 Q Are you at your home or at work?

13 A At my house. At home.

14 Q Okay. I guess that's almost an
15 irrelevant question now since every -- so many
16 people work from home. But I just wanted to make
17 the distinction.

18 So you're at your home address in
19 Douglas County?

20 A Yes, I work remotely.

21 Q Okay. Great.

22 And so you mentioned -- sorry -- that
23 you were at your home in Douglasville. And that's
24 of course in Douglas County; correct?

25 A That's correct.

1 Q And what is -- what is your current
2 address?

3 A My current address is [REDACTED]
4 [REDACTED]. That's going to be Douglasville, Georgia,

5 [REDACTED]
6 Q And how long have you lived at that
7 address, sir?

8 A Five years.

9 Q How long have you lived in Douglas
10 County?

11 A Off and on seven years.

12 Q What was your address prior to your
13 current address in Douglas County?

14 A The whole address?

15 Q Yes.

16 A [REDACTED]. I want to say
17 [REDACTED] Marietta, Georgia.

18 Q And was that address in Cobb County?

19 A Cobb County, yes.

20 Q Okay. Let me ask you a couple more
21 questions. So are you originally from Georgia?

22 A I am.

23 Q And where in Georgia were you born just
24 generally?

25 A Mableton, Georgia.

1 Q I don't need the hospital or anything
2 like that. So in Mableton, Georgia.

3 Okay. Did you -- did you grow up in
4 Mableton?

5 A I did.

6 Q And how long did you live in Mableton?

7 A I lived in Mableton until I was 17.

8 Q And where did you live -- where did you
9 live after that?

10 A I went to college in Tuskegee, Alabama.

11 Q And then did you pretty much live for
12 the time that you attended that school in Alabama or
13 did you keep your residence in Georgia?

14 A I -- this is years ago. I want to say
15 that I -- for voting purposes I switched my
16 registration over to Alabama for those four years
17 that I was there.

18 Q When you completed college where did you
19 live then?

20 A I went and got my master's at Fort
21 Valley University in Fort Valley, Georgia.

22 Q And how long did you live in Fort
23 Valley?

24 A Two years.

25 Q And where did you move to after Fort

1 Valley?

2 A I went -- I went and got a second
3 master's at Kennesaw State University in Kennesaw,
4 Georgia.

5 Q I'm going to ask you about your
6 education in a moment. But I wanted to kind of get
7 your residence clear for the record.

8 Okay. So when you were in Kennesaw
9 State did you live in Kennesaw?

10 A No, I actually lived in Douglasville.

11 Q Okay. All right. So did you move from
12 Fort Valley directly to Douglasville?

13 A From Fort Valley I moved back to
14 mother's house in Mableton, Georgia.

15 Q And what county is your mom's house in?

16 A Cobb County.

17 Q How long did you live with your mom in
18 Douglas -- or, sorry -- in Mableton at that point?

19 A Until I got a full-time job. That was
20 in November of 2012. I moved to Douglasville.

21 Q So in November of 2012 where did you
22 live?

23 A In November of 2012 I moved to
24 Douglasville.

25 Q And what was the address that you lived

1 in Douglasville when you moved in -- to Douglasville
2 in November of 2012?

3 A I cannot remember the exact address, but
4 the apartment complex was [REDACTED] in
5 Douglasville.

6 Q And how long did you live there at
7 [REDACTED]?

8 A Until -- I want to say until 2015.

9 Q And where did you next reside?

10 A I moved -- I moved in with my girlfriend
11 which is now my wife in Marietta, Georgia.

12 Q Was that the apartment on [REDACTED]
13 that you mentioned earlier?

14 A This apartment was down the street from
15 that apartment.

16 Q Okay.

17 A Yes. I know.

18 Q Yeah. That's fine. We just kind of
19 generally need to know.

20 Okay. So you were -- sorry. I know
21 you've told me this. The [REDACTED]
22 apartment, was that Cobb County?

23 A [REDACTED], that's Douglas
24 County.

25 Q That was Douglas County. Okay.

1 A Yes.

2 Q And then you said you moved to -- and
3 then you said you moved to an apartment in Cobb
4 County --

5 A Correct.

6 Q -- in approximately 2015; is that right?

7 A Repeat the question.

8 Q Sorry. And then from the [REDACTED]
[REDACTED] apartment did you move from there to an
10 apartment in Cobb County in 2015?

11 A Correct.

12 Q And how long did you live in Cobb
13 County?

14 A Total -- total years?

15 Q Sure.

16 A If we count until I was 17 years old,
17 and then the three or so years that I lived in
18 Marietta, that would be 20 years total.

19 Q Okay. So let me start over. So you
20 lived in Cobb County from 2015 till 2018?

21 A 2017. Sorry.

22 Q Okay. And I know you mentioned the
23 [REDACTED] apartment and another apartment down
24 the street from there. Did you live anywhere else
25 in Cobb County between 2015 and 2017 other than what

1 you've mentioned to us already?

2 A No.

3 Q And then it was in 2017 that you moved
4 to Douglasville?

5 A Correct.

6 Q What address did you move to in
7 Douglasville in 2017?

8 A My current address.

9 Q Okay. The street name, did you say, was
10 [REDACTED] [REDACTED]?

11 A [REDACTED].

12 Q So is that [REDACTED]

13 [REDACTED]

14 A [REDACTED].

15 Q Okay. All one word.

16 A All one word, yes, ma'am.

17 Q Okay. Great. Thank you.

18 And where you live in Douglasville on
19 the [REDACTED] address, is that a property that
20 you own?

21 A Yes, ma'am.

22 Q Is that a house?

23 A A house.

24 Q Okay. And is your home located in any
25 particular subdivision?

1 A Yes, it is.

2 Q And what's the name of the subdivision?

3 A [REDACTED].

4 Q And is the [REDACTED] house, is
5 that your sole residence?

6 A It is.

7 Q And who lives with you there?

8 A My wife and my two kids.

9 Q I'm going to ask you some questions now
10 just about your education. I know you referred to
11 some of it, so we'll go through that as briefly as
12 we can.

13 A Sure.

14 Q So then when you went to high school
15 that would have been when you lived in Mableton?

16 A Yes.

17 Q What high school did you attend?

18 A I went to South Cobb High School.

19 Q And were you involved in any groups or
20 organizations while you were in high school?

21 A JROTC.

22 Q Anything else?

23 A No.

24 Q So no political organizations --

25 A No.

1 Q -- while in high school?

2 What year did you graduate from South
3 Cobb High?

4 A 2006.

5 Q And did you go straight to college after
6 graduating from high school?

7 A Yes.

8 Q And I know you mentioned it earlier, but
9 can you tell again where did you go to college?

10 A Tuskegee University.

11 Q What degree program were you involved
12 with -- or involved with a Tuskegee?

13 A Bachelor's of biology. Bachelor of
14 science, biology.

15 Q And what year did you graduate from
16 Tuskegee?

17 A 2010.

18 Q What groups or organizations were you
19 involved in while you were at does key go, if any?

20 A I joined -- I'm sorry. Go ahead.

21 Q I'm sorry. I just said "if any." But
22 let me ask it again then. So what organizations
23 were you involved in while you attended Tuskegee?

24 A I joined a fraternity.

25 Q Are you still a member of that

1 fraternity?

2 A I am.

3 Q And what fraternity did you join?

4 A Kappa Alpha Psi.

5 Q Any other groups or other organizations
6 that you were involved in while you attended
7 Tuskegee?

8 A I was briefly a member of NAACP, the
9 Tuskegee chapter.

10 Q Sorry. The light goes off in my office.
11 Okay. So you were briefly a member of
12 the NAACP chapter Tuskegee; is that right?

13 A Correct.

14 Q Any other organizations while you were
15 at Tuskegee?

16 A No.

17 Q When you graduated from Tuskegee --
18 Tuskegee did you go right into a master's program
19 there?

20 A I did.

21 Q And was that at Fort Valley State?

22 A Yes.

23 Q So from when to when, what year to what
24 year did you attend Fort Valley State?

25 A 2010 to 2012.

1 Q And what was your master's in from Fort
2 Valley State?

3 A Public health.

4 Q Was there any specialty area in public
5 health that your degree was there?

6 A Environmental health.

7 Q And I believe you mentioned that you
8 also got a degree from Kennesaw State. Is that
9 correct?

10 A Correct.

11 Q And from when to when were you in the
12 degree -- that master's degree program at Kennesaw
13 State?

14 A 2013 to 2014.

15 Q And what was that master's program, what
16 was the specialty there?

17 A Business administration.

18 Q Any specialty within business
19 administration or just generally?

20 A Just general.

21 Q Do you have any other degrees?

22 A I'm currently in school right now.

23 Q You are. Okay. And what degree program
24 are you are currently pursuing?

25 A Juris doctorate.

1 Q And what school is that with?

2 A Mitchell Hamline School of Law.

3 Q And how far along are you in that degree
4 program?

5 A It's a part-time four-year program, so I
6 am two years in.

7 Q Is there any particular area of the law
8 that you are kind of concentrating your efforts in?

9 A Criminal law.

10 Q And what do you hope to use your degree
11 for, the law degree?

12 A I want to either go into public defense
13 or prosecution.

14 Q Other than what you've told us about,
15 any other education, formal education?

16 A No.

17 Q I don't mean to say that's not enough.
18 I just wondered if there was anything else.

19 So, okay. So any other training or
20 licensures or certifications related to employment
21 or your professional career? Anything else that
22 we've not mentioned yet?

23 A Not related to my professional career,
24 no.

25 Q Okay. So what is -- is it -- so tell me

1 about the ones that are not related to your
2 professional career.

3 A I have a Six Sigma green belt.

4 Q So you said you had a green belt. And
5 what else did you say about it?

6 A Six Sigma green belt.

7 Q Okay. And when did you receive your
8 training in Six Sigma?

9 A It was in 2017.

10 Q Any other training or licensures,
11 certifications?

12 A No.

13 Q I know you've mentioned that you're a
14 member of the fraternity Kappa Alpha Psi. Are you
15 active in that organization currently?

16 A Financially, no.

17 Q Are you active in that organization in
18 any other way other than financial?

19 A Currently, no.

20 Q Have you held any positions of
21 leadership in the fraternity?

22 A No.

23 Q Have you participated in any committees
24 within the fraternity?

25 MR. JONES: Objection. Relevance.

1 You may answer.

2 A No.

3 Q Do you participate in a local chapter of
4 the fraternity?

5 A Not currently.

6 Q When in the past did you participate in
7 a local chapter of the fraternity?

8 A I haven't yet.

9 Q Okay. Are you involved in any political
10 organizations?

11 A Involved as in work for or volunteer?

12 Q We'll go with the -- let's go ahead and
13 start with work for.

14 A No.

15 Q How about volunteer?

16 A Fair Fight Action, NAACP Atlanta, and
17 New Georgia Project and When We All Vote.

18 Q And Where [sic] We All Vote, is that the
19 name of the organization?

20 A Yes.

21 Q Tell me about your involvement with Fair
22 Fight Action. What volunteer work did you do with
23 them?

24 A I was a county captain for Douglas
25 County. I had to check in with the local board of

1 elections to see if they needed additional poll
2 workers. And after the election was over, I was
3 tasked with finding out what provisional ballots
4 were -- were waiting to be processed.

5 Q And what election are you talking about
6 there?

7 A 2020 election.

8 Q Did you volunteer with Fair Fight Action
9 for -- or during any other election other than the
10 2020 election?

11 A No. I want to say no.

12 Q You mentioned that you volunteered with
13 the New Georgia Project. What time period did you
14 volunteer with the New Georgia Project?

15 A I want to say it was around the same
16 time of the 2020 election.

17 Q What volunteer work did you do in
18 connection with the New Georgia Project at that
19 time?

20 A Poll monitor.

21 Q When you say the 2020 election, was that
22 the November presidential election?

23 A Yes.

24 Q Did you work as a poll monitor during
25 any other election in 2020?

1 A No.

2 Q Any other work with the New Georgia
3 Project other than working as a poll monitor?

4 A No.

5 Q And you work with Where [sic] We All
6 Vote, tell me about that.

7 A It's When We All Vote.

8 Q Sorry. Excuse me. So the name of it is
9 When We All Vote?

10 A Yes.

11 Q Of course. Okay. So that organization
12 -- tell me about your work with that organization?

13 A I essentially assembled a group of
14 volunteers and we register people to vote.

15 Q And from when to when have you worked
16 with the When We All Vote organization?

17 A 2020 until present.

18 Q So you worked with that organization
19 from 2020. Which elections were you registering
20 people to vote for?

21 A For the 2020 presidential election, for
22 the run-off election, and any election that's
23 happened since then.

24 Q Does that include the primary and then
25 the general this past November and the recent

1 run-off?

2 A Yes.

3 Q Have you been involved in any other
4 organizations related to voting or election other
5 than what you have mentioned to us thus far?

6 A No.

7 Q I'm going to ask you some questions
8 about your employment. Where -- what is your
9 current employment?

10 A ConnectWise.

11 Q And what work do you do for that
12 company?

13 A I'm a data analyst.

14 Q I think you mentioned you work for them
15 remotely.

16 A Yes.

17 Q And you work for them remotely from your
18 home? Would that be correct?

19 A Correct.

20 Q And as a data analyst who does your work
21 involve?

22 A Talking to clients, sourcing what their
23 business needs are, building detail metrics to
24 account for those needs, and showing those metrics
25 in a visual format.

1 Q How long have you worked for that
2 company?

3 A Since November of 2021.

4 Q Where did you work before that company?

5 A NICE-Nexidia.

6 (Court reporter request.)

7 A N as in Nancy, I as in indigo, N as in
8 Nancy -- I'm sorry. Let me start over. N as in
9 Nancy, I as in indigo, C as in Charlie, E as in echo
10 dash Nexidia. N as in Nancy, E as in echo, X as in
11 x-ray, I as in India, D as in dog, I as in India, A
12 as in apple.

13 Q How long did you work for NICE-Nexidia?

14 A 2018 to 2021.

15 Q And what work did you do for them?

16 A Business analyst.

17 Q Just generally speaking, what did your
18 job entail?

19 A Essentially the same work as my current
20 job, just the change in title. So building
21 reports -- building visual reports and reporting on
22 different metrics.

23 Q And what was your job title with
24 NICE-Nexidia?

25 A Business analyst.

1 Q And in that job did you also work
2 remotely or did you work in an office?

3 A So initially I was not office, then the
4 pandemic happened and then we moved to remote.

5 Q Where was the office located?

6 A In Atlanta, Piedmont Road in Atlanta.

7 Q Why did you leave that position for your
8 current position?

9 A Higher pay and better benefits.

10 Q So before NICE-Nexidia where did you
11 work?

12 A Sprint.

13 Q Would you say that again, please? I'm
14 sorry. I missed it.

15 A Yes, ma'am. Sprint, the telephone
16 company.

17 Q And what did you do to for Sprint?

18 A I was an account manager.

19 Q How long did you work for Sprint?

20 A From February of 2017 to -- no. I'm
21 sorry. From -- yeah, from February of 2017 to
22 February of 2018.

23 Q And while working for Sprint where was
24 your office?

25 A Norcross, Georgia.

1 Q Before Sprint where did your work?

2 A Before Sprint I worked at Ryder -- Ryder
3 Trucking Company.

4 Q And are they based in Atlanta?

5 A They're based in -- the headquarters is
6 in Florida.

7 Q Were you working at a location here in
8 Georgia when you worked for Ryder Trucking?

9 A Yes.

10 Q And where was that? Where was it
11 located in Georgia?

12 A Marietta, Georgia.

13 Q And what did you do for Ryder Trucking?

14 A I was in a management trainee program.

15 Q And what area of the company was that
16 management training program directed to?

17 A Can you clarify that?

18 Q Sure. That was not a very clear
19 question. Tell me about the management training
20 program.

21 A It was a program where you come in under
22 a sales route or an operational route. And
23 depending -- depending upon what route you choose,
24 you move up the corporate ladder.

25 So I wanted the operational route, but

1 when I about the hired it was shut down so I had to
2 move into the sales route, which the next step I was
3 to become an account manager and you become a
4 realtor manager where you have your own location.

5 Q From when to when did you work at Ryder
6 Trucking?

7 A 2016 to 2017.

8 Q I'm going to ask you about your voting
9 history. So are you currently registered to vote in
10 Georgia?

11 A Yes.

12 Q And are you registered to vote at your
13 current address?

14 A Yes.

15 Q Have you voted in any other county in
16 Georgia other than Douglas County?

17 A Yes.

18 Q What other counties in Georgia have you
19 voted in?

20 A Cobb County.

21 Q What congressional district did you
22 reside in before the recent redistricting took
23 effect?

24 A Congregational District 13.

25 Q And you currently reside in

1 Congressional District 13; is that right?

2 A I do.

3 Q Have you voted in each election in
4 Georgia since you've been registered to vote?

5 A Repeat the question.

6 Q Sure. Have you voted in each election
7 in Georgia since you've been registered to vote in
8 Georgia?

9 A Not every election.

10 Q Have you voted in all of the general
11 elections --

12 A I have.

13 Q -- since you've been registered to vote
14 in Georgia?

15 A I have.

16 Q And when did you -- sorry. Excuse me.
17 I didn't mean to interrupt you.

18 A No. No, I was saying I have.

19 Q Okay. And when did you register to
20 vote -- first register to vote in Georgia?

21 A That is a very good question. It's been
22 since, I want to say -- I want to say 20 -- I want
23 to say 2012.

24 Q So which -- let me ask it this way.
25 Which presidential -- or, I'm sorry. Which general

1 elections have you voted in in Georgia?

2 A Definitely the 2012 election for the
3 president at that time. And pretty much every
4 election since I moved back to Georgia.

5 Q And did you vote in the past election,
6 the November of 2022 election?

7 A Yes.

8 Q And what precinct did you vote in?

9 A Are you referring to the precinct
10 number?

11 Q Or the address or however you can
12 describe it for us.

13 A Usually I early vote, so I usually I go
14 to the courthouse in Douglas County and vote.

15 Q And is that where you went to vote for
16 the November 2022 election?

17 A For the November 2022 election we
18 had four early voter locations. I went to the old
19 courthouse and voted, the old courthouse.

20 Q Did you also vote in the run-off
21 election?

22 A I did.

23 Q And where did you vote for the run-off
24 location?

25 A The same location, the old courthouse.

1 Q And I think you mentioned that while you
2 were at Tuskegee you had registered to vote in
3 Alabama; is that correct?

4 A That's correct.

5 Q Other than the voting in Alabama while
6 you attended Tuskegee, have you ever voted in any
7 other state other than Georgia?

8 A No.

9 Q Do you consider yourself to be a member
10 of the Democratic party?

11 A I do.

12 Q And since when would you consider
13 yourself to be a member?

14 A Ever since I've been voting.

15 Q So when you say that began?

16 MR. JONES: Objection. Asked and
17 answered.

18 You may answer.

19 A I want to say 2012.

20 Q Have you held any leadership positions
21 with the Democratic party?

22 A No.

23 Q Have you ever served on any committees
24 or held any position with the local Democratic party
25 in Douglasville?

1 A No.

2 Q Have you ever considered yourself to be
3 a member of the Republican party?

4 A No.

5 Q Is it fair to say that you generally
6 support Democratic candidates for election in
7 Georgia?

8 A I support candidate that support my
9 views.

10 Q Have you ever voted for a Republican
11 candidate?

12 A I have.

13 Q I'm sorry. Did you say I have not or I
14 have?

15 A I have.

16 Q And what Republican candidates have you
17 voted for?

18 A I cannot remember. I just know that
19 that was the only person on the ballot for that
20 particular spot that was being elected.

21 Q Other than voting for a Republican
22 candidate when that was the only candidate listed on
23 the ballot, have you voted for any other Republican
24 candidate?

25 A I have not.

1 Q When did you first learn about the
2 lawsuit that we're here about today?

3 A I want to say it was last year.

4 Q And how did you hear about the lawsuit?

5 A I was in a social media group that was
6 discussing political matters and there was a part in
7 the discussion where they brought up
8 redistricting -- I can't even say the word --
9 redistricting going on in Georgia, and they asked if
10 anybody was interested in learning more about it
11 and, you know, to reach out. So that's how I
12 learned about it.

13 Q And you said that was about a year ago;
14 is that right?

15 A I want to say it was definitely earlier
16 this year, like way earlier this year.

17 Q So early 2022? Does that sound about
18 right?

19 A Yeah, going into -- I want to
20 definitely say the beginning of this year.

21 Q Okay. All right. I know the years kind
22 of fall together, particularly through the pandemic,
23 so I understand.

24 Okay. When did you first communicate
25 with an attorney about the lawsuit?

1 A Like I said, definitely the beginning of
2 this year.

3 Q And who was the attorney that you first
4 spoke with?

5 A Mr. -- Mr. Jones.

6 Q And what made you decide to sue the
7 secretary of state and the state board of elections?

8 A Repeat -- can you repeat that again for
9 me?

10 Q Sure. What -- how did you decide to sue
11 the secretary of state and the state board of
12 elections in this lawsuit?

13 A So there appears to be an effort to
14 restrict the voice of black voters, and along with
15 me doing voter registration and doing civic
16 engagement activities, I figured that, you know,
17 this would also be something that would be
18 beneficial as well to make sure that everybody has a
19 chance at, you know, having their voter heard.

20 Q What do you hope the lawsuit
21 accomplishes?

22 A I hope that the lawsuit allows for fair
23 maps to be drawn where the minority which black and
24 brown voters are able to elect candidates that
25 they want to actually elect and they actually

1 choose.

2 Q Did you attend any meetings to discuss
3 this case before you hired your attorney?

4 A No.

5 Q Did you do any research concerning the
6 issues in this case?

7 A No.

8 Q Did you do any research about your
9 attorney in this case?

10 A No.

11 Q And have you signed a contract with your
12 attorney?

13 A You said have I signed a contract with
14 my attorney?

15 Q Yes, sir.

16 A No.

17 Q And is your engagement with them, is
18 that a verbal agreement?

19 A I guess I'm confused on what -- what are
20 we saying is a contract.

21 Q Let me ask this, a little bit of a
22 different question. Do you have a fee agreement
23 with your attorney?

24 A A fee agreement?

25 Q Yes.

1 A No.

2 Q And have you made any payments to your
3 attorneys in this case?

4 A No.

5 Q Do you know if they have received any
6 compensation for their work in the case?

7 A I'm not aware.

8 Q And have you yourself been paid or
9 received anything of value in exchange for your
10 participation in the lawsuit?

11 A No.

12 Q You had you mentioned earlier,
13 Mr. Glaze, that you reviewed the complaint in this
14 case to prepare for the deposition. Do I recall
15 that correctly?

16 A Yes.

17 Q Do you remember if that was the amended
18 complaint in this matter?

19 A The amended complaint, yes.

20 Q And the amended complaint, I believe, is
21 the complaint that's currently in effect. Is that
22 also your understanding?

23 MR. JONES: Objection. It's a legal
24 conclusion.

25 You may answer.

1 Q I'm not asking any legal conclusion,
2 just your general knowledge, Mr. Glaze?

3 A That's my understanding.

4 Could you give me one second real quick?
5 Is that okay?

6 Q Sure. Why don't -- yeah, we can -- why
7 don't -- do you want to take like a -- just a
8 five-minute break.

9 A Yes.

10 (Recess.)

11 Q (By Ms. LaRoss) Mr. Glaze, are you ready
12 to go?

13 A Ready.

14 Q Thank you. I had asked you about the
15 amended complaint in this case. I would show it to
16 you but my share screen is disabled, so I'm just
17 going to read for you a couple of the sentences from
18 the complaint and you can just tell me if they're
19 accurate or not. I apologize that I'm not just
20 showing it to you.

21 So Paragraph 16 of the amended complaint
22 says -- it begins, it says, Plaintiff, Ojuan Glaze,
23 is a black citizen of the United States and the
24 state of Georgia. Mr. Glaze is a registered voter
25 and intends to vote in future congregational

1 elections. He is a resident of Douglas County and
2 located in the 13th congregational district under
3 the inactive plan.

4 Are all of those statements true and
5 correct today?

6 A That's correct.

7 Q Okay. And you intend to vote in future
8 congressional elections?

9 A I do.

10 Q And what candidate did you vote for in
11 the 13th Congressional District this past November?

12 A David Scott.

13 Q Had you voted for Mr. Scott previously?

14 A I have.

15 Q Did you reach out to any legislators
16 during the 2021 special session of the General
17 Assembly here in Georgia? And I'm asking
18 specifically concerning redistricting.

19 A No.

20 Q Had you reached out to any legislators
21 in the General Assembly concerning restricting
22 issues before the 2021 special election? Sorry.
23 Special session, excuse me, on the General Assembly.

24 A Not redistricting -- not redistricting,
25 no.

1 Q Were there other matters that you
2 reached out to your legislators --

3 A Yes.

4 Q -- before the special session?

5 A Not for the special -- not for the
6 special session, no.

7 Q Okay. And other than the special
8 session, have you reached out to your legislators in
9 the General Assembly?

10 A Yes.

11 Q And what matters or concerns did you
12 reach out to them for?

13 A Regarding Senate Bill 202.

14 Q Was there specific concerns about SB 202
15 or was it just -- were they general?

16 A Specific concerns.

17 Q What were your specific concerns with SB
18 202?

19 A Limiting the number of polling
20 locations, talks of getting rid of Souls to the
21 Polls, banning serving drinking water to people
22 while they are in line, and the -- that was the
23 large part of it.

24 Q Have you reached out to any legislators
25 concerning redistricting issues after the 2021

1 special session of the General Assembly?

2 A I have not.

3 Q Did you testify at the General Assembly
4 on any issues related to redistricting in 2021?

5 A I have not.

6 Q Did you attend any hearings of the
7 Georgia Legislature pertaining to redistricting?

8 A No.

9 Q Have you attended any other meetings
10 concerning redistricting in 2021?

11 A Repeat the question one more time for
12 me.

13 Q Sure. Did you attend any other
14 meetings -- and what I mean is any meetings other
15 than the hearings at the Georgia Legislature
16 concerning redistricting?

17 A These weren't official meeting
18 regarding redistricting, but I did attend meetings
19 with Where We All Vote that talked a little bit
20 about what was going on with the redistricting.

21 Q And where were those meetings held?

22 A Virtually.

23 Q Say that again? I'm sorry.

24 A Virtually.

25 Q Okay. My apologies. I'm going to have

1 to go off the record for a second. There's some
2 noise outside my office and I'm not sure if you guys
3 can hear that, so I don't want to --

4 (Off the record.)

5 Q (By Ms. LaRoss) And before we went off
6 the record, Mr. Glaze, I think you attended meetings
7 with When [sic] We All Vote and you attended those
8 meetings virtually. Do I have that correct?

9 A That's correct.

10 Q How many meetings did you attend
11 virtually with When We All Vote that pertained in
12 any way to redistricting?

13 A Probably just one meeting.

14 Q Mr. Glaze, do you have any understanding
15 of the term community of interest?

16 A Did you say community of interest?

17 Q Yes.

18 A It sounds like a very broad term, but I
19 want to say I don't have a deep understanding of it.

20 Q Okay. What would you consider your
21 community of interest?

22 MS. LaROSS: Objection. Calls for
23 speculation.

24 You may answer.

25 A My understanding of community of

1 interest would probably be a community that's
2 basically targeted or being looked into.

3 Q And what would you consider your
4 community of interest?

5 MR. JONES: Objection. Calls for
6 speculation. You may answer.

7 A My community interest from my -- my
8 understanding would probably be black minority.

9 Q And where do you say that you are from?

10 A Can you clarify?

11 Q Sure. Like if someone asked you where
12 you're from, what would you tell them?

13 A Well, generally speaking if someone
14 asked me where I'm from, I would just say where I
15 was born at. So I'm from Mableton, Georgia.

16 Q And what would you consider your
17 community now?

18 A When you say community, can you clarify
19 that? Like what do you mean by community?

20 Q Of the -- what I'm really trying to
21 understand is what you understand your community to
22 be. Some people consider it only professional
23 communities or where -- where they live, where they,
24 you know, are involved in different things.

25 So I'm just -- and I apologize, but I'm

1 trying to -- I don't want to limit it because I want
2 to understand from you what you consider your
3 community to be.

4 MR. JONES: And we'll object on the
5 basis of the question. It's ambiguous.

6 But, Mr. Glaze, you may answer.

7 A I would say my community would be where
8 I currently reside, but if we're speaking of
9 community of interest, then I would lean towards my
10 race, but being -- being a part of where I reside
11 and my race put together.

12 So I would say the black population of
13 the part of Douglasville that I currently live.

14 Q Do you participate in any neighborhood
15 organizations or associations?

16 A No.

17 Q Do you participate in any community
18 organizations?

19 A Outside of what I named earlier, no.

20 Q And you mentioned earlier civic
21 organizations. Do you participate with any civic
22 organizations other than what you described for us
23 today?

24 A No.

25 Q Are you a member of any faith-based

1 organizations?

2 A Outside of my church, no.

3 Q So then -- you belong to a church then?

4 A Yes.

5 Q And do you regularly attend services at
6 that church or any other place of worship?

7 A Not like I need to. So I'm going to say
8 "no."

9 Q Okay. I'm not going to report that to
10 anyone, Mr. Glaze. Are you involved in any
11 activities or groups connected to your church?

12 A My church is really involved in civic
13 engagements, so that's probably the only group that
14 I'm a part of currently.

15 Q What church do you belong to?

16 A First Corinth Missionary Baptist Church
17 in Atlanta, Georgia.

18 Q Where in Atlanta is that located?

19 A Off of Donald Lee Hollowell.

20 Q About how far is this church from your
21 home?

22 A Give or take 30 minutes.

23 Q Have you held any positions of
24 leadership with your church?

25 A No.

1 Q Are there any particular activities
2 or functions that you attend at your church other
3 than services, weekly services?

4 A No.

5 Q And the civic engagement group, tell me
6 about that generally. What do you all do?

7 A So I was a part an effort to register
8 voters at my church, and just to make sure that they
9 are aware of what the upcoming elections are and to
10 basically notify anybody that they are affiliated
11 with to participate in the elections.

12 Q And how long have you done that, the
13 work that you've described with your church?

14 A I would like to say since 2020.

15 Q How long have you been a member of the
16 church?

17 A Since I have a child, so as long I can
18 remember. Since I was a child.

19 Q Are you involved in any school
20 associations?

21 A Repeat the question for me.

22 Q Yes. Are you involved in any school
23 associations?

24 A Yes.

25 Q And what associations are those?

1 A Black Law Student Association, and I'm a
2 member of the Journal -- Journal of Public Policy at
3 my school.

4 Q Are you involved in any other
5 organizations connected to the law school you're
6 attending?

7 A No.

8 Q And the second one that you mentioned,
9 did you say it was General Public Policy?

10 A The Long Journal -- Long Journal of
11 Public Policy.

12 Q And have you written any articles for
13 that journal?

14 A No.

15 Q What is your involvement with that
16 organization?

17 A I'm an editing associate.

18 Q Are you planning on writing an article
19 for that journal?

20 A I have actually written an article for
21 my long paper requirement for graduation. I may
22 submit it to the journal. I haven't decided yet
23 whether I'm going to do that or not.

24 Q And what's the title of that article?

25 A I would have to go look the title up.

1 It's kind of a long title, but it was dealing
2 with -- let me see the best way to describe it --
3 racial discrimination in policing and the effects
4 that mediation can have on it.

5 Q Is this an article that you wrote with
6 anyone else or was that just you as the author?

7 A Just me.

8 Q Have you written any articles pertaining
9 to elections or voting?

10 A No.

11 Q Other than the organizations that you
12 talked about today, do you participate in any -- any
13 others, any other volunteer organizations, civic
14 organizations or associations?

15 A No.

16 Q And where do you typically socialize?

17 A Mainly in my community with my family.
18 We have friends over and usually we go out to eat
19 sometimes from time to time.

20 Q And when you go out from time to time,
21 is that locally or do you go into Atlanta or where
22 typically do you go guys go out to eat?

23 A A mixture of both locally and then we go
24 to Atlanta from time to time.

25 Q Outside of work and your church, where

1 do you spend most of your time?

2 A Either at home watching television or at
3 the gym.

4 Q How far is your gym from your house?

5 A And of course spending time with my
6 kids.

7 Q Sorry.

8 A I had to throw that in there, of course.

9 Q What was that last part? Go ahead.

10 A Spending time with my kids.

11 Q How old are your children?

12 A I have a six-year-old and I have a
13 three-year-old.

14 Q Have you ever been prevented from
15 registering to vote based on your race?

16 A It's want to say no. I want to say no.

17 Q Have you ever been prevented from
18 participating in the political process based on your
19 race?

20 A Explicitly? No. But implicitly
21 probably.

22 Q Describe what you mean by implicitly.

23 A So recently we had a court challenge
24 where it worked its way up to the Georgia Supreme
25 Court, and it was in relation to voting in the

1 run-off election over the weekend. And it seems
2 like it's an orchestrated effort to not have people
3 of color to be able to vote on the weekends because
4 it's -- the explanation that was given didn't really
5 make sense because they were saying that it was
6 after a holiday, which -- which was Robert E. Lee's
7 birthday and then Thanksgiving.

8 So it kind of seemed to have like a
9 racial aspect to it. That was -- that's on top
10 of trying to get rid of Souls to the Polls in the
11 past. So it -- that's what I mean when I say
12 implicitly.

13 Q And were you -- have you yourself ever
14 been prevented from casting a ballot because of the
15 implicit issues that you've just described?

16 A Well, since the Supreme Court of Georgia
17 struck it -- well, they said that it was fine to go
18 ahead and let them vote on the weekend, so we -- no
19 one was obstructed from being able to vote.

20 Q Did you vote over that weekend on that
21 Saturday after Thanksgiving?

22 A I actually voted the first day that it
23 was available for early voting in the run-off, so I
24 didn't really have to have that issue.

25 Q And what was the first day of early

1 voting in Douglas County?

2 A The first day of early voting in Douglas
3 County was the 22nd of November.

4 Q And that would have been before
5 Thanksgiving? Do I have that right?

6 A Literally right before Thanksgiving.

7 Q Okay. Do you have any personal
8 knowledge of discrimination by the government of
9 Georgia against members of a minority relating to
10 participation in the democratic process?

11 A Yes.

12 Q And describe that for us.

13 A It's a very long list. It can go all
14 the way back to Georgia having a run-off election
15 period because that is -- the run-off election in
16 Georgia is actually rooted in racism because you
17 have to get 50 plus percent of the vote in order to
18 essentially win the run-off.

19 And what they were saying is that black
20 people had -- had an upper hand in playing a part in
21 electing individuals that they wanted. So they
22 decided to switch over to the actual run-off part
23 where you have to get 50 plus percent of the votes
24 instead of just getting the majority of the vote.

25 So that brings in a whole lot of

1 intimidation tactics and everything along those
2 lines to diminish that vote.

3 Also, we had a former president call
4 down to our state after the election in 2020
5 basically saying that I want to find a certain
6 number of votes. And it's kind of odd because
7 before doing that this former president listed down
8 locations across the country that were -- where
9 predominantly black voters showed up to vote. So
10 mainly Detroit, Philadelphia, Atlanta, just to name
11 a few.

12 Even in our -- you know, our election
13 law that we have, as I stated, they tried to get rid
14 of Souls to the Polls, which was specifically where
15 black people would literally go after service to go
16 to -- you know, go and vote.

17 Not to mention taking away polling
18 locations -- I'm sorry -- dropoff locations for
19 absentee ballots in mainly the larger communities
20 where black people are present, but leaving those
21 locations -- those dropoff locations in rural areas
22 where people can go just go and drop off easily.

23 So it's -- it's a very long list of race
24 tactics in voting here in Georgia that we are aware
25 of here.

1 Q You mentioned intimidation. Have you
2 ever been subjected to me any sort of intimidation
3 when you have voted?

4 A Myself personally, no. But I am aware
5 of other intimidation tactics that have occurred.

6 Q Have you witnessed that's been
7 intimidated while trying to vote?

8 A We had poll workers in Fulton County and
9 I want to also say DeKalb County that were
10 being threatened if they didn't do their, quotation
11 marks, jobs correctly and, you know, count votes as
12 they should be counted and throw out illegal --
13 quotation marks, illegal ballots.

14 So that's -- that's what I'm aware of.

15 Q Okay. And how are aware of that?

16 A It made the -- it made the local news.

17 Q Is there anyone that you know of
18 personally that was a poll worker who was being
19 threatened?

20 A Personally, no.

21 Q Do you know what racially polarized
22 voting is?

23 A I do.

24 Q And what's your understanding of what
25 that means?

1 A My understanding of it is when a racial
2 group largely votes for a certain a -- a certain
3 block. So as we know from what the numbers tell us,
4 that the majority of black voters largely vote
5 Democratic. And on the flip side, the majority of
6 white voters usually vote Republican.

7 Q Do you personally know any black voters
8 what have told you they voted for a Republican
9 candidate?

10 A I met one on vacation, yeah.

11 Q Who did that -- who did that person vote
12 for?

13 MR. JONES: Objection. Hearsay.

14 A That person said they voted for the
15 former president.

16 Q And you said you were on vacation at the
17 time. Where were you on vacation?

18 MR. JONES: Objection. Relevance.

19 You may answer.

20 A South Carolina.

21 Q Do you know if Georgia uses a majority
22 vote requirement in elections?

23 A Your mic had cut out for a second. Can
24 you say it a little bit louder?

25 Q Sure. Do you know if Georgia uses a

1 majority vote requirement in its elections?

2 A Yes.

3 Q And you would agree then that the
4 majority vote requirement led to the run-off in
5 2021; correct?

6 A Yes.

7 Q And that run-off in 2021 resulted in the
8 election of Senator Warnock and Senator Ossoff;
9 correct?

10 A That's correct.

11 Q And did you support those candidates in
12 the run-off?

13 A I did.

14 Q And again, the majority vote requirement
15 led to the run-off earlier this month. Would you
16 agree with that?

17 A I do. I agree with it.

18 Q Did you support Senator Warnock in the
19 run-off?

20 A I did.

21 Q Are you familiar with the term candidate
22 slating.

23 A You said candidate slating?

24 Q Yes.

25 A I'm not -- not familiar with that term.

1 Can you just -- are you able to describe it to me?

2 Q If you're not familiar with it, we can
3 move on. I just wanted to know if you had any
4 understanding of it.

5 A Okay.

6 Q Has a lack of education ever kept you
7 from participating in Georgia politics because of
8 your race?

9 A A lack of education?

10 Q Yes.

11 A No.

12 Q Has the lack of employment opportunities
13 kept you from participating in Georgia politics
14 because of your race?

15 A Not me personally, no.

16 Q Has an access to adequate health
17 services prevented you from participating in Georgia
18 politics?

19 A Me personally, no.

20 Q Are you aware of the term racial appeal
21 when used in connection with elections?

22 A I'm sorry. Repeat it for me.

23 Q Sure. Are you aware of the term racial
24 appeal in the context of election?

25 A Yes.

1 Q And have you personally seen campaigns
2 in Georgia characterized but racial appeal?

3 A Yes, I have.

4 Q And describe those for us.

5 A In the past election -- well, in the
6 most recent election there was a talk of inflation
7 prices -- inflation prices, also a need to crack
8 down on crime. And when the term crime was used and
9 the image that was shown on television when talking
10 about crime, every commercial that I've seen was a
11 depiction of black individuals that took -- that
12 took -- that took to the streets in the 2020 protest
13 for the death of George Floyd.

14 But not accounting for the fact that
15 only 10 percent of those protests were a little bit
16 rowdy, but they decided to use that as the image of
17 what crime looks like.

18 But there was no showing of any other
19 race when talking about crime on the -- on any of
20 the commercials that I have seen. So it appealed --
21 it appears to be specifically targeting a group to
22 make them the face of crime.

23 Q In what election did you see the
24 instances that you've just described?

25 A This past midterm election.

1 Q And was it in any particular races
2 during the midterm elections?

3 A Definitely down here in Georgia for our
4 elections for our state officials. I also attend
5 school in a hybrid program, so sometimes I have to
6 go to my school's campus which is in Minnesota. So
7 when I traveled up there for a week and I had a
8 chance to actually see their commercials for their
9 elected officials, it was the same thing.

10 So when you mention crime, it was
11 showing, you know, black people at a George Ford
12 protest.

13 Q Are there any other racial appeals in
14 the context of Georgia elections other than what
15 you've described?

16 A Yes. Yes. The talking point of needing
17 to crack down on immigration, and largely it shows
18 the southern border but not mentioning the fact that
19 the southern border isn't the only way to immigrate
20 into this country.

21 Most people come in through airlines or
22 other means of entry. But the need to highlight the
23 southern border, which is largely the Hispanic
24 population and Haitian population, it kind of gives
25 the image of we need to crack down on brown people

1 entering the country.

2 Q Anything else that you would consider a
3 racial appeal in connection to campaigns in Georgia?

4 A Those are the most glaring examples that
5 I can think of right now.

6 Q Okay. Do you know how many black people
7 have run for office in Georgia?

8 A As of recently or overall?

9 Q Overall.

10 A I can't give a number to overall, but
11 it's been -- it's been a large number. And I want
12 to say that's not even just related to a specific
13 parties. It's been on both sides, Democratic and
14 Republican, of black people running for office.

15 Q Do you know how many black people have
16 been elected to public office in Georgia?

17 A Outside of Raphael Warnock -- and we're
18 saying state office, right?

19 Q Yes.

20 A Okay. Statewide, the only person I can
21 think of is Raphael Warnock.

22 Q Did you know that the former chief
23 justice of the Georgia Supreme Court, Harold Milton,
24 was black and that position was an elected statewide
25 office?

1 A I'm aware of the Georgia Supreme Court,
2 but I'm not -- I was unaware that they -- that he
3 was elected. I thought he was appointed. But I'm
4 aware of that.

5 Q Are you aware that Herschel Walker when
6 he ran on the Republican ticket in the primary he
7 was elected by a wide margin of -- by exclusively
8 Republican voters? Are you aware of that?

9 A I'm aware that he was elected to
10 represent his party, but not elected to office.

11 Q Are there any needs of the minority
12 community in Georgia in your opinion that differ
13 from the needs of white residents?

14 A I'm sorry. Repeat the question for me?

15 Q Sure. Are there any needs of the
16 minority community in Georgia that in your opinion
17 differ from the needs of white residents?

18 A Clarify -- clarify the question for me.
19 I think I know what you're asking, but just -- can
20 you clarify for just one -- yes.

21 Q Sure. I can make it a little bit more
22 specific. So are there any needs of the black
23 community in Georgia that in your opinion differ
24 from those of white residents in Georgia?

25 A Yes. Specifically I will say healthcare

1 needs. Where I'm situated there are not a lot of
2 medical or therapeutic resources that will -- it's
3 not the same number compared to what you will see
4 going into like -- let's say East Cobb. For
5 example, I have a child with special needs that
6 requires -- requires therapy. So let's say speech
7 therapy.

8 Here you may only find two or three
9 speech therapy companies. But if you were to travel
10 over to the East Cobb area, there are an unlimited
11 number of not only -- not only just speech therapy,
12 but occupational therapy and other healthcare needs
13 that you can acquire just by going right down the
14 street. You might pass three or four or five
15 locations.

16 But here that number isn't equivalent to
17 where it is there.

18 Also, education-wise there are more
19 private schools in certain white communities versus
20 where I -- where I reside. There are private
21 schools, but the number is nowhere what you would
22 see like in a Marietta or a Vining location.

23 Another example that I can probably give
24 is -- I want to say from a foods standpoint as well,
25 compared to East Cobb where you would see something

1 like a, you know, Whole Foods or a Trader Joe's
2 or -- what is it called? -- sprouts or, you know,
3 those kind of healthy food stores. There's probably
4 one near me. But, again, it's not the same as
5 going, you know, over to those areas where there's
6 an abundance of healthy food sources.

7 So those are -- those are three examples
8 I can probably give.

9 Q I'm not sure if I asked you this before.
10 Have you ever worked on a political campaign?

11 A No, I haven't.

12 Q Have you ever worked in connection with
13 getting any particular candidate elected?

14 MR. JONES: Objection. Vague.

15 You may answer.

16 THE WITNESS: You said answer?

17 MR. JONES: You may.

18 A I volunteered to phone bank for Raphael
19 Warnock.

20 Q Any other candidate?

21 A Yes. I volunteered to phone -- text
22 bank and phone bank for Stacey Abrams.

23 Q Any other candidate besides Senator
24 Warnock and Stacy Abrams?

25 MR. JONES: Objection. Asked and

1 answered.

2 You may answer.

3 A No.

4 Q I'm just going to take just a second to
5 look at my notes. I think that I have gotten
6 through all my questions, but let me just check.

7 MS. LaROSS: Mr. Glaze, that's all the
8 questions that I have. Thank you for your
9 time today. We appreciate it.

10 THE WITNESS: Thank you so much.

11 MS. LaROSS: I'm not sure if Mr. Jones
12 has any questions.

13 MR. JONES: No, I don't have any
14 questions. So thank you very much, Mr. Glaze.
15 We appreciate you.

16 THE WITNESS: Thank you.

17 (Deposition concluded at 12:06 p.m.)

18

19

20

21

22

23

24

25

E R R A T A S H E E T

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or Official Code of Georgia Annotated 9-11-30(e), any changes in form or substance which you desire to make to your deposition testimony shall be entered upon the deposition with a statement of the reasons given for making them.

To assist you in making any such corrections, please use the form below. If supplemental or additional pages are necessary, please furnish same and attach them to this errata sheet.

- - -

I, the undersigned, OJUAN GLAZE, do hereby certify that I have read the foregoing deposition and that to the best of my knowledge said deposition is true and accurate (with the exception of the following corrections listed below).

Page ____ Line ____ should read: _____

Reason for change: _____

Page ____ Line ____ should read: _____

Reason for change: _____

Page ____ Line ____ should read: _____

Reason for change: _____

Page ____ Line ____ should read: _____

Reason for change: _____

Page ____ Line ____ should read: _____

Reason for change: _____

Page ____ Line ____ should read: _____

Reason for change: _____

Page ____ Line ____ should read: _____

Page 66

Reason for change:_____

Page____Line____should read:_____

Reason for change:_____

Page ____Line____should read:_____

Reason for change:_____

Page ____Line____should read:_____

Reason for change:_____

Page ____Line____should read:_____

Reason for change:_____

Page ____Line____should read:_____

Reason for change:_____

Page____Line____should read:_____

Reason for change:_____

Page____Line____should read:_____

Reason for change:_____

OJUAN GLAZE

Sworn to and subscribed
before me this ____ day
of _____, 2023.

Notary Public:_____

My Commission Expires:_____

DISCLOSURE

STATE OF GEORGIA DEPONENT: OJUAN GLAZE
COUNTY OF FULTON

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure.

I am a Georgia Certified Court Reporter. I am here as an independent contractor for Veritext Legal Solutions. Veritext Legal Solutions was contacted by the offices of Diane LaRoss, Esquire, to provide court reporting services for this deposition. Veritext Legal Solutions will not be taking this deposition under any contract that is prohibited by O.C.G.A 9-11-28 (c).

Veritext Legal Solutions has no contract/agreement to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. Veritext Legal Solutions will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to



CARLA J. HOPSON, CCR# B-1816
January 3, 2023.

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing deposition was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the foregoing transcript is a true and correct record of the evidence given.

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of Veritext Legal Solutions, Certified Court Reporters, and the signature and original seal is attached thereto.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of the action.

This, the 5th day of January, 2023.



CARLA J. HOPSON, RPR

Certified Shorthand Reporter

B-1816

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

Page 69

1 Mike Jones

2 mjones@elias.law

3 January 5th, 2023

4 RE: Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.

5 12/14/2022, Ojuan Glaze (#5609369)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 (cs-southeast@veritext.com).

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

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

Page 70

Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.

Ojuan Glaze (#5609369)

E R R A T A S H E E T

PAGE_____ LINE_____ CHANGE_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

REASON_____

PAGE_____ LINE_____ CHANGE_____

REASON_____

Ojuan Glaze

Date

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

Page 71

1 Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.
2 Ojuan Glaze (#5609369)

ACKNOWLEDGEMENT OF DEPONENT

3
4 I, Ojuan Glaze, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Ojuan Glaze

Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC
20
21
22
23
24
25

[05339 - agree]

Page 1

0	2014 20:14	4	accounting
05339 1:6	2015 14:8 15:6	4 2:8	58:14
1	15:10,20,25	400 3:4	accuracy 69:9
1 2:3 5:14	2016 30:7	414 11:17	accurate 39:19
10 58:15	2017 15:21,25	5	65:10
10.b 67:4	16:3,7 22:9	5 2:3	acknowledge...
10:08 1:14	28:20,21 30:7	50 52:17,23	71:3
12/14/2022	2018 15:20	5609369 69:5	acknowledg...
69:5	27:14 28:22	70:2 71:2	69:12
12:06 64:17	202 3:5 41:13	5th 68:20 69:3	acquire 62:13
13 30:24 31:1	41:14,18	6	action 1:5
13th 40:2,11	2020 24:7,10,16	678 3:10	23:16,22 24:8
14 1:13	24:21,25 25:17	8	68:19
16 39:21	25:19,21 47:14	8494 11:3	active 22:15,17
1600 3:9	53:4 58:12	9	activities 36:16
1625 11:16	2021 27:3,14	9-11-28 67:10	46:11 47:1
17 12:7 15:16	40:16,22 41:25	9-11-30 65:3	actual 52:22
1816 1:20	42:4,10 56:5,7	968-4490 3:5	add 5:18
67:17 68:24	2022 1:13 32:6	a	additional 24:1
1:21 1:6	32:16,17 35:17	a.m. 1:14	65:7
2	2023 66:21	able 36:24 51:3	additions 71:6
20 15:18 31:22	67:18 68:20	51:19 57:1	address 10:18
71:15	69:3	abrams 63:22	11:2,3,7,12,13
200 3:9	21133 67:16	63:24	11:14,18 13:25
20001-5825 3:4	68:22	absentee 53:19	14:3 16:6,8,19
2006 18:4	22nd 52:3	abundance	30:13 32:11
2010 18:17	250 3:4	63:6	adequate 57:16
19:25	3	access 57:16	administration
2012 13:20,21	3 67:18	accomplishes	20:17,19
13:23 14:2	30 46:22 65:2	36:21	affiliated 47:10
19:25 31:23	69:17	account 26:24	agency 67:12
32:2 33:19	30134 11:5	28:18 30:3	ago 12:14
2013 20:14	30339 3:9		35:13
	336-7228 3:10		agree 6:12 56:3
			56:16,17

agreeable 6:24 7:8,17,18 8:2,3 agreed 5:7,13 6:25 7:9 agreement 5:7 37:18,22,24 67:11 ahead 7:15 18:20 23:12 50:9 51:18 airlines 59:21 al 1:3,6 69:4,4 70:1,1 71:1,1 alabama 12:10 12:12,16 33:3 33:5 allotted 69:20 allow 5:13 allowable 5:4 allows 36:22 alpha 19:4 22:14 ambiguous 45:5 amended 38:17 38:19,20 39:15 39:21 analyst 26:13 26:20 27:16,25 annotated 65:3 answer 5:21 6:20 7:14 23:1 33:18 38:25 43:24 44:6 45:6 55:19	63:15,16 64:2 answered 33:17 64:1 answers 68:7 anybody 35:10 47:10 apartment 11:17 14:4,12 14:14,15,22 15:3,9,10,23,23 apologies 42:25 apologize 39:19 44:25 appeal 57:20 57:24 58:2 60:3 appealed 58:20 appeals 59:13 appearances 3:1 appears 36:13 58:21 appended 71:7 apple 27:12 applicable 69:8 appointed 61:3 appreciate 64:9 64:15 approximately 15:6 area 20:4 21:7 29:15 62:10 areas 53:21 63:5	arrested 9:10 article 48:18,20 48:24 49:5 67:4 articles 48:12 49:8 asked 33:16 35:9 39:14 44:11,14 63:9 63:25 asking 39:1 40:17 61:19 aspect 51:9 assembled 25:13 assembly 40:17 40:21,23 41:9 42:1,3 assist 65:6 associate 48:17 association 48:1 associations 45:15 47:20,23 47:25 49:14 atlanta 1:2 3:9 23:16 28:6,6 29:4 46:17,18 49:21,24 53:10 attach 5:8,13 65:7 attached 68:16 69:11 attend 17:17 19:24 37:2	42:6,13,18 43:10 46:5 47:2 59:4 attended 12:12 18:23 19:6 33:6 42:9 43:6 43:7 attending 48:6 attorney 35:25 36:3 37:3,9,12 37:14,23 68:18 69:13 attorneys 10:6 38:3 auspices 68:14 author 49:6 available 51:23 69:6 avenue 3:4 aware 38:7 47:9 53:24 54:4,14,15 57:20,23 61:1 61:4,5,8,9
b			
b 3:3 67:17 68:24 bachelor 18:13 bachelor's 18:13 back 13:13 32:4 52:14 ballot 34:19,23 51:14			

[ballots - child]

Page 3

ballots 24:3 53:19 54:13 bank 63:18,22 63:22 banning 41:21 baptist 46:16 based 29:4,5 45:25 50:15,18 basically 44:2 47:10 53:5 basis 45:5 began 33:15 beginning 35:20 36:1 begins 39:22 behalf 3:2,7 believe 20:7 38:20 belong 46:3,15 belt 22:3,4,6 beneficial 36:18 benefits 28:9 best 7:7 49:2 65:10 better 28:9 bill 41:13 biology 18:13 18:14 birthday 51:7 bit 4:11 37:21 42:19 55:24 58:15 61:21 black 36:14,23 39:23 44:8	45:12 48:1 52:19 53:9,15 53:20 55:4,7 58:11 59:11 60:6,14,15,24 61:22 block 55:3 board 5:2 6:7 23:25 36:7,11 67:4 border 59:18 59:19,23 born 11:23 44:15 brad 1:6 69:4 70:1 71:1 braylen 17:3 break 7:12,16 39:8 briefly 17:11 19:8,11 brings 52:25 broad 43:18 brought 35:7 brown 36:24 59:25 building 26:23 27:20,21 business 20:17 20:18 26:23 27:16,25	call 53:3 called 63:2 calls 43:22 44:5 campaign 63:10 campaigns 58:1 60:3 campus 59:6 candidate 34:8 34:11,22,22,24 40:10 55:9 56:21,23 63:13 63:20,23 candidates 34:6,16 36:24 56:11 captain 23:24 caption 68:6 career 21:21,23 22:2 carla 1:20 67:17 68:23 carolina 55:20 case 4:10 9:13 10:1,5 37:3,6,9 38:3,6,14 39:15 67:12,12 67:14 cases 8:23 casting 51:14 ccr 1:20 67:17 cellphone 7:21 7:24 century 14:4,7 14:21,23 15:8	certain 53:5 55:2,2 62:19 certainly 7:11 certification 68:11 certifications 21:20 22:11 certified 67:6 68:15,23 certify 65:9 68:5,17 challenge 50:23 chance 36:19 59:8 change 27:20 65:14,16,18,20 65:22,24 66:1 66:3,5,7,9,11 66:13,15 70:4 70:7,10,13,16 70:19 changes 65:3 69:10 71:6 chapter 19:9,12 23:3,7 characterized 58:2 charge 67:13 charged 9:7 charlie 27:9 check 23:25 64:6 chief 60:22 child 47:17,18 62:5
	c		
	c 27:9 67:10 68:1,1		

[children - counsel]

Page 4

children 50:11	colloquies 68:7	39:21	consider 33:9
choose 29:23	color 51:3	complete 7:14	33:12 43:20
37:1	come 29:21	71:8	44:3,16,22
church 46:2,3,6	59:21	completed	45:2 60:2
46:11,12,15,16	commercial	12:18 69:17	considered
46:20,24 47:2	58:10	complex 14:4	34:2
47:8,13,16	commercials	computer 7:23	contacted 67:8
49:25	58:20 59:8	concentrating	context 57:24
circle 3:9	commission	21:8	59:14
citizen 39:23	66:23	concerning	contract 37:11
civic 36:15	committees	37:5 40:18,21	37:13,20 67:9
45:20,21 46:12	22:23 33:23	41:25 42:10,16	67:11
47:5 49:13	communicate	concerns 41:11	contractor 67:7
civil 1:5 5:5	35:24	41:14,16,17	copies 69:14
65:3	communities	concluded	corinth 46:16
claim 9:1,4	44:23 53:19	64:17	corporate
clarify 6:13	62:19	conclusion	29:24
29:17 44:10,18	community	38:24 39:1	correct 9:11,12
61:18,18,20	43:15,16,21,25	conditions 8:14	10:24,25 15:5
clear 6:22 13:7	44:1,4,7,17,18	confuse 6:10	15:11 16:5
29:18	44:19,21 45:3	confused 37:19	19:13 20:9,10
clearly 7:3	45:7,9,17	congregational	26:18,19 33:3
clients 26:22	49:17 61:12,16	30:24 39:25	33:4 40:5,6
coakley 1:3	61:23	40:2	43:8,9 56:5,9
69:4 70:1 71:1	companies 62:9	congressional	56:10 68:9
cobb 11:18,19	company 26:12	30:21 31:1	71:8
13:16 14:22	27:2,4 28:16	40:8,11	corrections
15:3,10,12,20	29:3,15	connected	65:6,11 71:6
15:25 17:18	compared 62:3	46:11 48:5	correctly 38:15
18:3 30:20	62:25	connection	54:11
62:4,10,25	compensation	24:18 57:21	council 67:5
code 65:3	38:6	60:3 63:12	counsel 3:1 5:7
college 12:10	complaint 9:21	connectwise	5:7,23 67:12
12:18 18:5,9	38:13,18,19,20	26:10	69:14
	38:21 39:15,18		

count 15:16 54:11 counted 54:12 counties 30:18 country 53:8 59:20 60:1 county 10:19 10:24 11:10,13 11:18,19 13:15 13:16 14:22,24 14:25 15:4,10 15:13,20,25 23:24,25 30:15 30:16,20 32:14 40:1 52:1,3 54:8,9 67:3 68:3 couple 4:12 11:20 39:17 course 10:24 25:11 50:5,8 court 1:1 6:21 8:8 27:6 50:23 50:25 51:16 60:23 61:1 67:4,6,8 68:15 courthouse 32:14,19,19,25 cover 67:13 crack 58:7 59:17,25 crime 9:7 58:8 58:8,10,17,19 58:22 59:10	criminal 21:9 cs 69:15 current 11:1,3 11:13 16:8 26:9 27:19 28:8 30:13 currently 20:22 20:24 22:15,19 23:5 30:9,25 38:21 45:8,13 46:14 customary 67:14 cut 55:23 cv 1:6 d d 2:1 27:11 dash 27:10 data 26:13,20 date 70:24 71:12 david 40:12 day 22:5 51:22 51:25 52:2 66:20 68:20 71:15 days 69:17 dc 3:4 dealing 49:1 death 58:13 december 1:13 decide 36:6,10 decided 48:22 52:22 58:16	declare 71:4 deemed 71:6 deep 43:19 defendant 6:6 defendants 1:7 3:7 4:10,25 defense 21:12 definitely 32:2 35:15,20 36:1 59:3 degree 18:11 20:5,8,12,12,23 21:3,10,11 degrees 20:21 dekalb 54:9 democratic 33:10,21,24 34:6 52:10 55:5 60:13 denied 68:12 depending 29:23,23 depiction 58:11 deponent 67:2 69:13 71:3 deposing 69:13 deposition 1:11 2:3 4:15,24 5:3 5:6,9,9,19,23 6:23 7:12,22 8:6,12,16 9:16 9:19,23 10:9 38:14 64:17 65:4,4,9,10 67:9,9,13 68:5	depositions 6:17 describe 32:12 49:2 50:22 52:12 57:1 58:4 described 45:22 47:13 51:15 58:24 59:15 desire 65:4 detail 26:23 detroit 53:10 devices 7:21 diane 3:8 4:9 67:8 differ 61:12,17 61:23 different 27:22 37:22 44:24 difficult 7:5 difficulties 5:10 diminish 53:2 directed 29:16 direction 68:8 directly 13:12 disabled 39:16 disassembly 68:12,13 disclosure 67:1 67:5 discount 67:14 discovery 5:4 discrimination 49:3 52:8
---	---	---	---

[discuss - example]

Page 6

discuss 37:2 discussed 9:13 9:16 discussing 35:6 discussion 35:7 distinction 10:17 district 1:1,1 30:21,24 31:1 40:2,11 division 1:2 dlaross 3:10 doctorate 20:25 document 10:1 documents 9:22 10:4 dog 27:11 doing 36:15,15 53:7 donald 46:19 douglas 10:19 10:24 11:9,13 13:18 14:23,25 23:24 30:16 32:14 40:1 52:1,2 douglasville 10:10,23 11:4 13:10,12,20,24 14:1,1,5 16:4,7 16:18 33:25 45:13 drawn 36:23	drinking 41:21 drop 53:22 dropoff 53:18 53:21 duly 4:4 duma 3:8 e e 2:1,6 16:12,14 16:14 27:9,10 51:6 65:1,1,1,2 65:3 68:1,1 70:3,3,3 earlier 14:13 18:8 35:15,16 38:12 45:19,20 56:15 early 32:13,18 35:17 51:23,25 52:2 easily 53:22 east 62:4,10,25 eat 49:18,22 echo 27:9,10 editing 48:17 education 13:6 17:10 21:15,15 57:6,9 62:18 effect 30:23 38:21 effects 49:3 effort 36:13 47:7 51:2 efforts 21:8 either 21:12 50:2	elect 36:24,25 elected 34:20 59:9 60:16,24 61:3,7,9,10 63:13 electing 52:21 election 5:2 6:7 8:23 9:1 24:2,5 24:7,9,10,16,21 24:22,25 25:21 25:22,22 26:4 31:3,6,9 32:2,4 32:5,6,16,17,21 34:6 40:22 51:1 52:14,15 53:4,12 56:8 57:24 58:5,6 58:23,25 elections 24:1 25:19 31:11 32:1 36:7,12 40:1,8 47:9,11 49:9 55:22 56:1 57:21 59:2,4,14 electronic 7:21 elias 3:3 elias.law 3:5 69:2 email 3:5,10 7:25 employee 68:18 employment 21:20 26:8,9 57:12	engagement 36:16 37:17 47:5 engagements 46:13 english 3:8 ensured 6:21 entail 27:18 entered 65:4 entering 60:1 entirely 7:13 entry 59:22 environmental 20:6 equivalent 62:16 errata 65:7 69:11,13,17 esquire 3:3,8 67:8 essentially 25:13 27:19 52:18 et 1:3,6 69:4,4 70:1,1 71:1,1 everybody 36:18 evidence 68:10 exact 14:3 examination 2:7 4:6 examined 4:4 example 62:5 62:23
---	---	---	---

[examples - girlfriend]

Page 7

examples 60:4 63:7 exception 65:10 exchange 38:9 exclusively 61:7 excuse 25:8 31:16 40:23 exhibit 2:3 5:14 exhibits 2:2 expires 66:23 explanation 51:4 explicitly 50:20 expressly 68:11	federal 5:5 65:2 fee 37:22,24 fight 23:16,22 24:8 figured 36:16 file 1:5 financial 22:18 67:14 financially 22:16 68:19 find 53:5 62:8 finding 24:3 fine 7:13 14:18 51:17 finish 6:19 first 4:4,16 5:22 31:20 35:1,24 36:3 46:16 51:22,25 52:2 five 11:8 39:8 62:14 flip 55:5 florida 29:6 floyd 58:13 following 65:11 67:5 follows 4:5 food 63:3,6 foods 62:24 63:1 ford 59:11 foregoing 65:9 68:5,8,13 71:5	form 5:20 65:3 65:6 formal 21:15 format 26:25 former 53:3,7 55:15 60:22 fort 12:20,21 12:22,25 13:12 19:21,24 20:1 forty 13:13 four 12:16 21:5 32:18 62:14 fraternity 18:24 19:1,3 22:14,21,24 23:4,7 friends 49:18 full 13:19 fully 8:11,15 fulton 54:8 67:3 68:3 functions 47:2 furnish 65:7 further 68:17 future 39:25 40:7	generally 11:24 14:19 20:19 27:17 34:5 44:13 47:6 george 58:13 59:11 georgia 1:1 3:9 10:11 11:4,17 11:21,23,25 12:2,13,21 13:4,14 14:11 23:17 24:13,14 24:18 25:2 28:25 29:8,11 29:12 30:10,16 30:18 31:4,7,8 31:14,20 32:1 32:4 33:7 34:7 35:9 39:24 40:17 42:7,15 44:15 46:17 50:24 51:16 52:9,14,16 53:24 55:21,25 57:7,13,17 58:2 59:3,14 60:3,7,16,23 61:1,12,16,23 61:24 65:3 67:2,5,6 68:2 getting 41:20 52:24 63:13 girlfriend 14:10
f			
f 3:8 68:1 face 58:22 fact 58:14 59:18 fails 69:19 fair 23:16,21 24:8 34:5 36:22 faith 45:25 fall 35:22 familiar 56:21 56:25 57:2 family 8:22,25 49:17 far 21:3 26:5 46:20 50:4 february 28:20 28:21,22			
		g	
		g 16:12,14 general 6:4 20:20 25:25 31:10,25 39:2 40:16,21,23 41:9,15 42:1,3 48:9	

[give - implicitly]

Page 8

give 39:4 46:22 60:10 62:23 63:8 given 8:5 51:4 65:5 67:14 68:10 71:9 gives 59:24 giving 10:8 glaring 60:4 glaze 1:11 4:3,7 4:24 5:12 6:4 8:4,5 38:13 39:2,11,22,24 43:6,14 45:6 46:10 64:7,14 65:9 66:18 67:2 69:5 70:2 70:24 71:2,4 71:12 glendale 16:10 glenn 16:12 glenview 11:3 16:11,19 17:4 go 6:4 7:15 17:11 18:5,9 18:19,20 19:18 21:12 23:12,12 32:13 39:12 43:1 48:25 49:18,20,21,22 49:22,23 50:9 51:17 52:13 53:15,15,16,22 53:22 59:6	goes 19:10 going 4:11 5:8 5:20 6:4 11:4 13:5 17:9 26:7 30:8 35:9,19 39:17 42:20,25 46:7,9 48:23 62:4,13 63:5 64:4 good 4:7,8,9 31:21 gotten 64:5 government 52:8 graciously 5:12 graduate 18:2 18:15 graduated 19:17 graduating 18:6 graduation 48:21 great 10:21 16:17 green 22:3,4,6 group 3:3 25:13 35:5 46:13 47:5 55:2 58:21 groups 17:19 18:18 19:5 46:11 grow 12:3	guess 10:14 37:19 guidelines 6:5 guys 5:16 43:2 49:22 gym 50:3,4 h h 65:1 70:3 haitian 59:24 hamline 21:2 hand 52:20 handle 6:1 happened 25:23 28:4 harold 60:23 head 7:4 headquarters 29:5 health 20:3,5,6 57:16 healthcare 61:25 62:12 healthy 63:3,6 hear 35:4 43:3 heard 36:19 hearings 42:6 42:15 hearsay 55:13 held 22:20 33:20,24 42:21 46:23 hereto 71:7 herschel 61:5 high 17:14,17 17:18,20 18:1	18:3,6 higher 28:9 highlight 59:22 hired 30:1 37:3 hispanic 59:23 history 30:9 holiday 51:6 hollowell 46:19 home 10:12,13 10:16,18,23 16:24 26:18 46:21 50:2 hope 21:10 36:20,22 hopson 1:20 67:17 68:23 hospital 12:1 house 10:13 13:14,15 16:22 16:23 17:4 50:4 huh 7:4 hybrid 59:5 i identified 5:14 illegal 54:12,13 image 58:9,16 59:25 immigrate 59:19 immigration 59:17 implicit 51:15 implicitly 50:20,22 51:12
--	---	---	---

[important - lee]

Page 9

important 6:18 inactive 40:3 include 25:24 independent 67:7 india 27:11,11 indigo 27:7,9 individuals 52:21 58:11 inflation 58:6,7 initially 28:3 instances 58:24 intend 40:7 intends 39:25 intent 6:10 interest 43:15 43:16,21 44:1 44:4,7 45:9 interested 35:10 68:19 interrupt 31:17 intimidated 54:7 intimidation 53:1 54:1,2,5 introductory 4:12 involve 26:21 involved 8:18 8:22 17:19 18:11,12,19,23 19:6 23:9,11 26:3 44:24 46:10,12 47:19 47:22 48:4	involvement 23:21 48:15 irrelevant 10:15 issue 51:24 issues 37:6 40:22 41:25 42:4 51:15 j j 1:20 67:17 68:23 january 67:18 68:20 69:3 job 13:19 27:18 27:20,23 28:1 jobs 54:11 joe's 63:1 join 19:3 joined 18:20,24 jones 3:3 5:24 6:2 22:25 33:16 36:5 38:23 44:5 45:4 55:13,18 63:14,17,25 64:11,13 69:1 journal 48:2,2 48:10,10,13,19 48:22 jrotc 17:21 judicial 67:5 juris 20:25 justice 60:23	k kappa 19:4 22:14 keep 8:11 12:13 kennesaw 13:3 13:3,8,9 20:8 20:12 kept 57:6,13 key 18:19 kids 17:8 50:6 50:10 kind 7:25 13:6 14:18 21:8 35:21 49:1 51:8 53:6 59:24 63:3 kinds 7:5 know 5:12,17 6:5,13 7:4 14:17,19,20 15:22 17:10 18:8 22:13 34:18 35:11,21 36:16,19 38:5 44:24 53:12,16 54:11,17,21 55:3,7,21,25 57:3 59:11 60:6,15,22 61:19 63:1,2,5 knowledge 39:2 52:8 65:10	l l 16:12,14 lack 57:6,9,12 ladder 29:24 large 41:23 60:11 largely 55:2,4 59:17,23 larger 53:19 laross 2:8 3:8 4:7,9,14,19,21 5:25 6:3 39:11 43:5,22 64:7 64:11 67:8 law 3:3 21:2,7 21:9,11 48:1,5 53:13 lawsuit 8:19 9:2 35:2,4,25 36:12,20,22 38:10 lawsuits 8:23 lawyer 9:14,17 leadership 22:21 33:20 46:24 lean 45:9 learn 35:1 learned 35:12 learning 35:10 leave 28:7 leaving 53:20 led 56:4,15 lee 46:19
---	--	--	--

[lee's - mentioned]

Page 10

lee's 51:6	15:12,24 16:18	lot 52:25 62:1	mean 21:17
legal 9:4 38:23	44:23 45:13	louder 55:24	31:17 42:14
39:1 67:7,7,9	lived 11:6,9	m	44:19 50:22
67:11,13 68:15	12:7 13:10,25	m 2:6	51:11
69:23	15:17,20 17:15	ma'am 16:16	means 54:25
legislators	lives 17:7	16:21 28:15	59:22
40:15,20 41:2	llp 3:8	mableton 11:25	media 7:25
41:8,24	local 23:3,7,25	12:2,4,6,7	35:5
legislature 42:7	33:24 54:16	13:14,18 17:15	mediation 49:4
42:15	locally 49:21	44:15	medical 8:14
licensures	49:23	majority 52:24	62:2
21:20 22:10	located 10:8	55:4,5,21 56:1	medications
light 19:10	16:24 28:5	56:4,14	8:10
limit 45:1	29:11 40:2	making 65:5,6	meeting 42:17
limiting 41:19	46:18	management	43:13
line 41:22	location 29:7	29:14,16,19	meetings 37:2
65:13,15,17,19	30:4 32:24,25	manager 28:18	42:9,14,14,18
65:21,23,25	62:22	30:3,4	42:21 43:6,8
66:2,4,6,8,10	locations 32:18	manor 17:3	43:10
66:12,14 70:4	41:20 53:8,18	maps 36:23	member 18:25
70:7,10,13,16	53:18,21,21	margin 61:7	19:8,11 22:14
70:19	62:15	marietta 11:17	33:9,13 34:3
lines 53:2	long 5:23 11:6	14:11 15:18	45:25 47:15
list 52:13 53:23	11:9 12:6,22	29:12 62:22	48:2
listed 34:22	13:17 14:6	marks 54:11,13	members 5:1
53:7 65:11	15:12 27:1,13	massachusetts	8:22,25 52:9
literally 52:6	28:19 47:12,15	3:4	memorandum
53:15	47:17 48:10,10	master's 12:20	10:4
litigation 67:15	48:21 49:1	13:3 19:18	memos 9:25
little 4:11 37:21	52:13 53:23	20:1,12,15	mention 53:17
42:19 55:24	look 9:21 48:25	matter 6:8	59:10
58:15 61:21	64:5	38:18	mentioned
live 12:6,8,9,11	looked 44:2	matters 9:1	10:22 14:13
12:19,22 13:9	looks 58:17	35:6 41:1,11	15:22 16:1
13:17,22 14:6			18:8 20:7

[mentioned - ojuan]

Page 11

21:22 22:13 24:12 26:5,14 33:1 38:12 45:20 48:8 54:1 mentioning 59:18 messaging 7:25 met 55:10 metrics 26:23 26:24 27:22 mic 55:23 michael 3:3 midterm 58:25 59:2 mike 5:25 69:1 milton 60:23 minnesota 59:6 minority 36:23 44:8 52:9 61:11,16 minute 39:8 minutes 46:22 missed 28:14 missionary 46:16 mittell 21:2 mixture 49:23 mjones 3:5 69:2 mom 13:17 mom's 13:15 moment 13:6 monitor 24:20 24:24 25:3	month 56:15 mor 16:10 morning 4:7,8 4:9 mother's 13:14 move 12:25 13:11 15:9 16:6 29:24 30:2 57:3 moved 13:13 13:20,23 14:1 14:10,10 15:2 15:3 16:3 28:4 32:4	needed 24:1 needing 59:16 needs 26:23,24 61:11,13,15,17 61:22 62:1,5 62:12 neighborhood 45:14 new 23:17 24:13,14,18 25:2 news 54:16 nexidia 27:5,10 27:13,24 28:10 nice 27:5,13,24 28:10 nod 7:4 noise 43:2 norcross 28:25 northern 1:1 notary 66:22 71:13,19 note 69:10 noted 71:7 notes 9:25 10:3 64:5 notice 2:3 5:6,8 notify 47:10 november 13:20,21,23 14:2 24:22 25:25 27:3 32:6,16,17 40:11 52:3	number 32:10 41:19 53:6 60:10,11 62:3 62:11,16,21 numbers 55:3 nw 3:4
	n		o
	n 2:1,6,6 16:12 16:12,14 27:7 27:7,8,10 naacp 19:8,12 23:16 name 4:9,16 16:9 17:2 23:19 25:8 53:10 named 45:19 nancy 27:7,8,9 27:10 near 63:4 necessary 65:7 71:6 need 5:18 7:1 7:22 12:1 14:19 46:7 58:7 59:22,25		o 2:6 o.c.g.a 67:10 oath 4:5 object 45:4 objection 5:16 22:25 33:16 38:23 43:22 44:5 55:13,18 63:14,25 objections 5:19 obstructed 51:19 obviously 7:22 occupational 62:12 occurred 54:5 odd 53:6 office 19:10 28:2,3,5,24 43:2 60:7,14 60:16,18,25 61:10 offices 67:8 official 42:17 65:3 officials 59:4,9 ojuan 1:11 4:3 4:18,19,24

[ojuan - piedmont]

Page 12

39:22 65:9 66:18 67:2 69:5 70:2,24 71:2,4,12 okay 4:23 5:23 6:3,14,15 7:1 8:4 10:7,14,21 11:20 12:3 13:8,11 14:16 14:20,25 15:19 15:22 16:9,15 16:17,24 19:11 20:23 21:19,25 22:7 23:9 25:11 31:19 35:21,24 39:5 40:7 41:7 42:25 43:20 46:9 52:7 54:15 57:5 60:6,20 old 15:16 32:18 32:19,25 50:11 50:12,13 ones 22:1 operational 29:22,25 opinion 61:12 61:16,23 opportunities 57:12 orchestrated 51:2 order 52:17	organization 22:15,17 23:19 25:11,12,16,18 48:16 organizations 17:20,24 18:18 18:22 19:5,14 23:10 26:4 45:15,18,21,22 46:1 48:5 49:11,13,14 original 68:16 originally 11:21 ossoff 56:8 outcome 68:19 outside 43:2 45:19 46:2 49:25 60:17 overall 60:8,9 60:10	paragraph 39:21 park 14:4,7,21 14:23 15:8 parkwood 3:9 part 5:9 7:5 21:5 35:6 41:23 45:10,13 46:14 47:7 50:9 52:20,22 participate 23:3,6 45:14 45:17,21 47:11 49:12 participated 22:23 participating 8:12,16 50:18 57:7,13,17 participation 38:10 52:10 particular 16:25 21:7 34:20 47:1 59:1 63:13 particularly 6:16,17 35:22 parties 60:13 67:14 party 8:18 33:10,21,24 34:3 61:10 67:12,15 68:18 pass 62:14	pay 28:9 payments 38:2 pendergrass 1:3 69:4 70:1 71:1 pending 7:14 people 10:16 25:14,20 41:21 44:22 51:2 52:20 53:15,20 53:22 59:11,21 59:25 60:6,14 60:15 percent 52:17 52:23 58:15 period 24:13 52:15 person 34:19 55:11,14 60:20 personal 52:7 personally 54:4 54:18,20 55:7 57:15,19 58:1 pertained 43:11 pertaining 42:7 49:8 philadelphia 53:10 phone 3:5,10 63:18,21,22 photocopying 68:12,14 piedmont 28:6
--	--	--	--

[place - raffensperger]

Page 13

place 46:6	predominantly 53:9	processed 24:4	pursuing 20:24
plaintiff 1:4 2:2	prepare 9:23	professional 21:21,23 22:2	put 45:11
39:22	38:14	44:22	q
plaintiffs 3:2	preparing 9:19	program 18:11	question 5:20
plan 40:3	present 25:17	19:18 20:12,15	6:11,13,20
planning 48:18	53:20	20:23 21:4,5	7:14 10:2,15
playing 52:20	president 32:3	29:14,16,20,21	15:7 29:19
please 4:17	53:3,7 55:15	59:5	31:5,21 37:22
28:13 65:6,7	presidential	prohibited	42:11 45:5
plus 52:17,23	24:22 25:21	67:10	47:21 61:14,18
point 13:18	31:25	project 23:17	questions 6:9
59:16	pretty 12:11	24:13,14,18	6:10 11:21
polarized 54:21	32:3	25:3	17:9 26:7 64:6
policing 49:3	prevent 8:15	pronounce	64:8,12,14
policy 48:2,9	prevented	4:16	68:7
48:11	50:14,17 51:14	property 16:19	quick 39:4
political 17:24	57:17	prosecution	quite 5:11
23:9 35:6	previously	21:13	quotation
50:18 63:10	40:13	protest 58:12	54:10,13
politics 57:7,13	prices 58:7,7	59:12	r
57:18	primary 25:24	protests 58:15	r 65:1,1 68:1
poll 24:1,20,24	61:6	provide 67:8,11	70:3,3
25:3 54:8,18	prior 8:22	provided 10:6	race 45:10,11
polling 41:19	11:12	provisional	50:15,19 53:23
53:17	private 62:19	24:3	57:8,14 58:19
polls 41:21	62:20	psi 19:4 22:14	races 59:1
51:10 53:14	probably 43:13	public 20:3,4	racial 49:3 51:9
population	44:1,8 46:13	21:12 48:2,9	55:1 57:20,23
45:12 59:24,24	50:21 62:23	48:11 60:16	58:2 59:13
position 28:7,8	63:3,8	66:22 71:19	60:3
33:24 60:24	procedure 5:5	purposes 5:3,4	racially 54:21
positions 22:20	65:3	12:15	racism 52:16
33:20 46:23	process 50:18	pursuant 65:2	raffensperger
precinct 32:8,9	52:10	67:4	1:6 5:1 69:4

70:1 71:1 ran 61:6 raphael 60:17 60:21 63:18 rates 67:14 ray 27:11 reach 35:11 40:15 41:12 reached 40:20 41:2,8,24 read 39:17 65:9 65:13,15,17,19 65:21,23,25 66:2,4,6,8,10 66:12,14 69:9 71:5 reading 6:1 ready 39:11,13 real 39:4 really 6:18 44:20 46:12 51:4,24 realtor 30:4 reason 65:14 65:16,18,20,22 65:24 66:1,3,5 66:7,9,11,13,15 69:11 70:6,9 70:12,15,18,21 reasons 65:5 recall 38:14 receipt 69:18 receive 22:7 received 38:5,9	recess 39:10 record 7:3,6 13:7 43:1,4,6 68:9 redistricting 30:22 35:8,9 40:18,24,24 41:25 42:4,7 42:10,16,18,20 43:12 reduced 68:7 referenced 69:6 referral 67:13 referred 17:10 referring 32:9 regarding 41:13 42:18 register 25:14 31:19,20 47:7 registered 30:9 30:12 31:4,7 31:13 33:2 39:24 registering 25:19 50:15 registration 12:16 36:15 regularly 46:5 regulations 67:4 relate 10:1,4 related 8:23 9:1 21:20,23 22:1 26:4 42:4 60:12	relating 52:9 relation 50:25 relative 68:17 relevance 22:25 55:18 remarks 4:12 remember 14:3 34:18 38:17 47:18 remote 1:16 28:4 remotely 10:20 26:15,17 28:2 repeat 10:2 15:7 31:5 36:8 36:8 42:11 47:21 57:22 61:14 report 46:9 reported 1:20 reporter 6:21 27:6 67:6,12 68:23 reporters 68:15 reporting 27:21 67:4,8 67:11,12 reports 27:21 27:21 represent 4:10 6:6 61:10 republican 34:3,10,16,21 34:23 55:6 60:14 61:6,8	republishation 55:8 request 27:6 required 71:13 requirement 48:21 55:22 56:1,4,14 requires 62:6,6 research 37:5,8 reserved 5:22 reside 14:9 30:22,25 45:8 45:10 62:20 residence 12:13 13:7 17:5 resident 40:1 residents 61:13 61:17,24 resources 62:2 respond 7:2,7 responsiveness 5:21 restrict 36:14 restricting 40:21 resulted 56:7 return 69:13,17 review 6:2 9:20 9:22 69:7 reviewed 38:13 rid 41:20 51:10 53:13 right 6:3 13:11 15:6 19:12,18 20:22 31:1
---	---	--	--

[right - sounds]

Page 15

35:14,18,21 52:5,6 60:5,18 62:13 road 11:16 14:12 15:23 28:6 robert 51:6 rooted 52:16 roswell 11:16 14:12 15:23 route 29:22,22 29:23,25 30:2 rowdy 58:16 rpr 1:20 68:23 rule 65:2 rules 5:5 65:2 67:4 run 25:22 26:1 32:20,23 51:1 51:23 52:14,15 52:18,22 56:4 56:7,12,15,19 60:7 running 60:14 rural 53:21 ryder 29:2,2,8 29:13 30:5	60:18 says 39:22,22 sb 41:14,17 school 12:12 17:14,17,18,20 18:1,6 20:22 21:1,2 47:19 47:22 48:3,5 59:5 school's 59:6 schools 62:19 62:21 science 18:14 scj 1:6 scott 40:12,13 screen 5:11 39:16 seal 68:16 second 13:2 39:4 43:1 48:8 55:23 64:4 secretary 4:25 6:6 36:7,11 see 5:15 24:1 49:2 58:23 59:8 62:3,22 62:25 seen 58:1,10,20 senate 41:13 senator 56:8,8 56:18 63:23 sense 51:5 sent 69:14 sentences 39:17	served 33:23 service 53:15 services 46:5 47:3,3 57:17 67:8,11 serving 41:21 session 40:16 40:23 41:4,6,8 42:1 setting 6:16 7:23 seven 11:11 shake 7:4 share 5:11 39:16 she'll 6:21 sheet 65:7 69:11 shorthand 68:23 show 39:15 showed 53:9 showing 26:24 39:20 58:18 59:11 shown 58:9 shows 59:17 shut 30:1 sic 23:18 25:5 43:7 side 55:5 sides 60:13 sigma 22:3,6,8 sign 6:2 69:12	signature 67:16 68:16,22 signed 37:11,13 69:20 signing 6:1 simply 7:13 sir 9:5 11:7 37:15 situated 62:1 six 22:3,6,8 50:12 slating 56:22 56:23 social 7:25 35:5 socialize 49:16 sole 17:5 solutions 67:7 67:7,9,11,13 68:15 69:23 sorry 10:22 13:18 14:20 15:8,21 18:20 18:21 19:10 25:8 27:8 28:14,21 31:16 31:25 34:13 40:22 42:23 50:7 53:18 57:22 61:14 sort 54:2 souls 41:20 51:10 53:14 sound 35:17 sounds 43:18
s			
s 2:6 65:1 70:3 sales 29:22 30:2 saturday 51:21 saying 31:18 37:20 51:5 52:19 53:5			

[sources - testified]

Page 16

sources 63:6 sourcing 26:22 south 17:18 18:2 55:20 southeast 69:15 southern 59:18 59:19,23 speak 6:18 speaking 27:17 44:13 45:8 special 40:16 40:22,23 41:4 41:5,6,7 42:1 62:5 specialty 20:4 20:16,18 specific 41:14 41:16,17 60:12 61:22 specifically 40:18 53:14 58:21 61:25 speculation 43:23 44:6 speech 62:6,9 62:11 spelled 4:21 spend 50:1 spending 50:5 50:10 spoke 36:4 spot 34:20 sprint 28:12,15 28:17,19,23 29:1,2	sprouts 63:2 stacey 63:22 stacy 63:24 standpoint 62:24 start 4:12,23 15:19 23:13 27:8 state 4:10,25 5:1 6:6,7 13:3 13:9 19:21,24 20:2,8,13 33:7 36:7,7,11,11 39:24 53:4 59:4 60:18 67:2 68:2 stated 53:13 68:6 statement 65:5 statements 40:4 states 1:1 39:23 statewide 60:20 60:24 step 30:2 stores 63:3 straight 18:5 street 11:4 14:14 15:24 16:9,10,11,13 16:14,19 17:4 62:14 streets 58:12 struck 51:17	student 48:1 subdivision 16:25 17:2 subjected 54:2 submit 48:22 subscribed 66:20 71:14 substance 65:4 sue 36:6,10 sued 6:7 suite 3:4,9 supplemental 65:6 support 34:6,8 34:8 56:11,18 supreme 50:24 51:16 60:23 61:1 sure 10:3 15:15 17:13 29:18 31:6 36:10,18 39:6 42:13 43:2 44:11 47:8 55:25 57:23 61:15,21 63:9 64:11 switch 52:22 switched 12:15 sworn 4:4 66:20 71:14 t t 2:6 65:1,1 68:1,1 70:3,3 tactics 53:1,24 54:5	take 7:12,15 39:7 46:22 64:4 taken 4:24 5:3 5:6 8:10 68:6 talk 58:6 talked 42:19 49:12 talking 24:5 26:22 58:9,19 59:16 talks 41:20 targeted 44:2 targeting 58:21 tasked 24:3 taylor 3:8 taylorenglish... 3:10 technical 5:10 technology 1:16 telephone 28:15 television 50:2 58:9 tell 18:9 21:25 23:21 25:6,12 29:19 39:18 44:12 47:5 55:3 term 43:15,18 56:21,25 57:20 57:23 58:8 testified 4:5 8:8
--	---	--	---

[testify - veritext]

Page 17

testify 42:3 testimony 6:5 65:4 69:9,18 71:8 text 7:25 63:21 thank 7:10,19 8:4 16:17 39:14 64:8,10 64:14,16 thanksgiving 51:7,21 52:5,6 therapeutic 62:2 therapy 62:6,7 62:9,11,12 thereto 68:16 thing 6:15 8:1 59:9 things 7:5 44:24 think 26:14 33:1 43:6 60:5 60:21 61:19 64:5 thought 61:3 threatened 54:10,19 three 15:17 50:13 62:8,14 63:7 throw 50:8 54:12 ticket 61:6 tight 48:24	till 15:20 time 6:18 7:11 7:15 9:1 12:12 13:19 21:5 24:13,16,19 32:3 42:11 49:19,19,20,20 49:24,24 50:1 50:5,10 55:17 64:9 69:19 timeframe 69:8 title 27:20,23 48:25 49:1 today 5:19 6:8 6:23 8:20 9:3 10:8 35:2 40:5 45:23 49:12 64:9 today's 6:5 8:12,16 9:19 9:23 told 14:21 21:14 55:8 top 51:9 total 15:14,14 15:18 trader 63:1 trainee 29:14 training 21:19 22:8,10 29:16 29:19 transcribed 7:3 transcript 5:15 6:22 68:9,13 69:6,20 71:5,8	travel 62:9 traveled 59:7 trial 5:22 tried 53:13 trucking 29:3,8 29:13 30:6 true 40:4 65:10 68:9 71:8 truthfully 8:11 8:15 trying 44:20 45:1 51:10 54:7 turn 7:20,24 tuskegee 12:10 18:10,12,16,23 19:7,9,12,15,17 19:18 33:2,6 two 12:24 17:8 21:6 62:8 typewriting 68:8 typically 49:16 49:22	44:8 54:24 55:1 57:4 united 1:1 39:23 university 12:21 13:3 18:10 unlimited 62:10 upcoming 47:9 upper 52:20 use 5:22 21:10 58:16 65:6 uses 55:21,25 usual 67:14 usually 32:13 32:13 49:18 55:6
			v
		uh 7:4 unaware 61:2 undersigned 65:9 understand 6:12 9:9 35:23 44:21,21 45:2 understanding 38:22 39:3 43:14,19,25	v 16:14 69:4 70:1 71:1 vacation 55:10 55:16,17 vague 63:14 valley 12:21,21 12:23 13:1,12 13:13 19:21,24 20:2 value 38:9 verbal 37:18 verbally 7:2,7 verify 69:9 veritext 67:7,7 67:9,11,13 68:14 69:14,23

[veritext.com - wrote]

Page 18

veritext.com 69:15	32:19 33:6 34:10,17,23 40:13 51:22 54:3 55:8,14	wanted 10:16 13:6 29:25 52:21 57:3	withdrawn 68:11
versus 62:19		warnock 56:8	witness 4:18,20 63:16 64:10,16 69:8,10,12,19
view 16:10,12	voter 32:18 36:15,19 39:24	56:18 60:17,21 63:19,24	witnessed 54:6
views 34:9	voters 36:14,24 47:8 53:9 55:4 55:6,7 61:8	washington 3:4	wondered 21:18
vining 62:22	votes 52:23 53:6 54:11 55:2	watching 50:2	word 16:15,16 35:8
virtually 42:22 42:24 43:8,11	voting 12:15 26:4 30:8 33:5 33:14 34:21 49:9 50:25 51:23 52:1,2 53:24 54:22	water 41:21	work 10:12,16 10:20 23:11,13 23:22 24:17,24 25:2,5,12 26:11,14,17,20 27:4,13,15,19 28:1,2,11,19 29:1 30:5 38:6 47:13 49:25
visual 26:25 27:21	vs 1:5	way 6:11,16,20 10:1,4 22:18 31:24 35:16 43:12 49:2 50:24 52:14 59:19	
voice 36:14	w	we've 21:22	worked 25:15 25:18 27:1 29:2,8 50:24 63:10,12
volunteer 23:11,15,22 24:8,14,17 49:13	w 16:14	week 59:7	worker 54:18
volunteered 24:12 63:18,21	waiting 24:4	weekend 51:1 51:18,20	workers 24:2 54:8
volunteers 25:14	walker 61:5	weekends 51:3	working 25:3 28:23 29:7
vote 23:17,18 25:6,7,9,14,16 25:20 30:9,12 31:4,7,13,20,20 32:5,8,13,14,15 32:20,23 33:2 39:25 40:7,10 42:19 43:7,11 50:15 51:3,18 51:19,20 52:17 52:24 53:2,9 53:16 54:7 55:4,6,11,22 56:1,4,14	want 4:22 5:25 11:16 12:14 14:8 21:12 24:11,15 31:22 31:22,22 33:19 35:3,15,19 36:25 39:7 43:3,19 45:1,1 50:16,16 53:5 54:9 60:11 62:24	weekly 47:3	worship 46:6
voted 30:15,19 31:3,6,10 32:1		went 12:10,20 13:2,2 17:14 17:18 32:15,18 43:5	writing 48:18
		west 14:4,7,21 14:23 15:9	written 48:12 48:20 49:8
		white 55:6 61:13,17,24 62:19	wrong 4:22
		wide 61:7	wrote 49:5
		wife 14:11 17:8	
		win 52:18	
		wise 62:18	

[x - zoom]

Page 19

x
x 2:1,6 27:10 27:11
y
yeah 14:18 28:21 35:19 39:6 55:10 year 18:2,15 19:23,24 21:5 35:3,13,16,16 35:20 36:2 50:12,13 years 11:8,11 12:14,16,24 15:14,16,17,18 21:6 35:21
z
zoom 1:16 6:16 6:17 7:23

Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

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

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

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:21-CV-05339-
SCJ

**DEFENDANTS' NOTICE TO TAKE THE DEPOSITION
OF OJUAN GLAZE**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, counsel for Defendants Brad Raffensperger, in his official capacity as Secretary of State of Georgia; William S. Duffey Jr., in his official capacity as chair of the State Election Board; and Matthew Mashburn, Sara Tindall Ghazal, Edward Lindsey, and Janice Johnston will take the oral examination of Plaintiff Ojuan Glaze on Wednesday, December 14, 2022, beginning at 10:00 a.m. and continuing thereafter until completed via Zoom videoconferencing through Veritext Legal Solutions. Details regarding the videoconferencing will be emailed to those participating once all arrangements are finalized.

EXHIBIT

1

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

This 1st day of December, 2022.

Respectfully submitted,

Christopher M. Carr
Attorney General
Georgia Bar No. 112505
Bryan K. Webb
Deputy Attorney General
Georgia Bar No. 743580
Russell D. Willard
Senior Assistant Attorney General
Georgia Bar No. 760280
Charlene McGowan
Assistant Attorney General
Georgia Bar No. 697316
State Law Department
40 Capitol Square, S.W.
Atlanta, Georgia 30334

/s/ Bryan P. Tyson
Bryan P. Tyson
Special Assistant Attorney General
Georgia Bar No. 515411
btyson@taylorenghish.com

Frank B. Strickland
Georgia Bar No. 678600
fstrickland@taylorenghish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenghish.com
Taylor English Duma LLP
1600 Parkwood Circle
Suite 200
Atlanta, Georgia 30339
(678) 336-7249
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2022, I caused a copy of the foregoing to be served by electronic mail on all counsel of record.

/s/ Bryan P. Tyson

Bryan P. Tyson

Counsel for Defendants