

# **Exhibit 4**



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# Transcript of Omari Ho-Sang, Corporate Representative

**Date:** August 29, 2023  
**Case:** Nairne, et al. -v- Ardoin

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA

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DR. DOROTHY NAIRNE, :  
et al., :  
Plaintiffs, : Civil Action No.  
v. : 3:22-cv-00178-SDD-SDJ  
R. KYLE ARDOIN, in :  
his official capacity :  
as Secretary of :  
Louisiana, :  
Defendants. :

- - - - - x  
  
Deposition of Black Voters Matter  
By Omari Ho-Sang, Corporate Representative  
(Conducted Remotely)  
Tuesday, August 29, 2023  
10:31 a.m.

Job No.: 504602  
Pages: 1 - 68  
Reported By: Leonora L. Walker, Court Reporter

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1 Deposition of OMARI HO-SANG, held at the  
2 offices of:

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5 (All parties appeared remotely via Zoom.)  
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10 Pursuant to notice, before Leonora L. Walker,  
11 Court Reporter, Notary Public in and for the State  
12 of New York.  
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A P P E A R A N C E S

ON BEHALF OF PLAINTIFFS:

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General

Stuart Naifeh - NAACP Legal Defense Fund

Sara Rohani - NAACP Legal Defense Fund

John Conine and John Walsh for Defendants

Michael Safee - Technician Specialist

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1 A Yes, I am.

2 Q And what is your current job title?

3 A My current job title is senior state  
4 organizing manager for Louisiana.

5 Q Okay. How long have you held that  
6 position?

7 A I was first hired in April 2020 as the  
8 Louisiana state coordinator which is essentially  
9 the same position.

10 Q Okay. So I believe you said there's a  
11 senior state organizer now in the title.

12 A Yes.

13 Q When did that title change occur?

14 A We became state organizing managers around  
15 2021, and then I became a senior state organizing  
16 manager in 2023.

17 Q And is that a full-time job?

18 A Yes.

19 Q And it's paid or unpaid?

20 A It is paid.

21 Q And what are your job duties?

22 A As the state organizing manager, I'm  
23 responsible for working with our partners in  
24 Louisiana across the state to help them get out  
25 the vote, to increase voter participation, and to

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1 also support their work around other community  
2 issues that they or their members or constituents  
3 or community are concerned about. I'm also  
4 responsible for assisting with our mini grant  
5 process for our partners and making  
6 recommendations around grants and providing  
7 training for partners based on their needs.

8 Q And I believe I heard you say a few times  
9 the term "partners."

10 A Yes.

11 Q Can you tell me what "partners" means?

12 A A partner is an organization or entity  
13 that we work with around increasing voter  
14 participation. Many times they are grassroots or  
15 community-based organizations that work -- have a  
16 specific mission and we provide support around  
17 that mission. And we also help them to increase  
18 their capacity to address their concerns as well  
19 as increase their capacity to get out the vote in  
20 their community.

21 Q And in your current role, who do you  
22 report to?

23 A I report to my deputy field director.

24 Q And who is that?

25 A Fenika Miller.

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1 Q Would you mind spelling that for the  
2 record?

3 A Sure. Fenika, F-E-N-I-K-A; last name  
4 Miller, M-I-L-L-E-R.

5 Q Great. Thank you.

6 Do any other BVM employees report to you?

7 A Yes. I have one person who reports to me,  
8 and that is the southern regional organizer,  
9 Keturah Butler-Reed.

10 Q What is the Black Voters Matter Fund?

11 A The Black Voters Matter Fund is the C4 arm  
12 of BVM.

13 Q What is the difference between the fund  
14 and the Capacity Building Institute?

15 A The BVM Capacity Building Institute is the  
16 C3 nonpartisan arm of Black Voters Matter. And  
17 that is -- that represents a bulk of the work that  
18 we do. The majority of the work that I do as a  
19 state organizing manager is -- concerns BVM  
20 Capacity Building Institute function or work. And  
21 then the Black Voters Matter Fund is the C4 arm of  
22 Black Voters Matter.

23 Q Okay. They are separate entities, but do  
24 they have shared staff?

25 A Yes.



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1 Q Okay. Do they have the same board of  
2 directors?

3 A Yes.

4 Q And your employment is with the C3 arm; is  
5 that correct?

6 A My employment is with Black Voters Matter  
7 Fund.

8 Q With the fund, okay. Yeah, I just want to  
9 make clear for the record here, but you understand  
10 that you're here today testifying for the Capacity  
11 Building Institute?

12 A Yes.

13 Q Okay. And I believe you have an e-mail  
14 address that's at Black VotersMatterFund.org?

15 A Correct.

16 Q Do you have one that's for the Capacity  
17 Building Institute?

18 A No. We utilize our Black Voters Matter  
19 Fund address.

20 Q Okay. And what is your role within --  
21 well, I believe you said you were employed by the  
22 Fund.

23 Is your position within the Fund the same  
24 as it is with the Capacity Building Institute?

25 A Yes, it is.

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1 parishes outside of Shreveport that All Streets,  
2 All People works in?

3 A We've organized across the state in  
4 various parishes.

5 Q I'd like to switch gears a little bit and  
6 ask you a few questions about BVM's operations.

7 Where is BVM's corporate office?

8 A BVM's corporate office is in Atlanta,  
9 Georgia.

10 Q And what states does BVM operate in?

11 A It operates in 25-plus states. There are  
12 core states, which Louisiana is one of the core  
13 states. There are about 12 of those states.  
14 Louisiana, Mississippi, Texas, Georgia, Florida,  
15 North Carolina, Pennsylvania, Michigan. Tennessee  
16 I believe is a core state, but I'm not absolutely  
17 sure about Tennessee. And then are -- so maybe  
18 that's not 12 that I've just named. And then are  
19 what we call light states that does not have  
20 dedicated staff. Like Louisiana has a -- two  
21 dedicated staff. Those are light states, and  
22 there are many more. I'm not completely aware of  
23 all of the light states that we have, but those  
24 states have a deputy director that runs those  
25 light states.

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1 Q What makes a state a core state?

2 A So as mentioned, a core state is defined  
3 by having a permanent staff member or a team that  
4 is employed by Black Voters Matter, and -- I mean,  
5 that's one of the key -- the key markings, and I  
6 would say that they're -- because of having  
7 personnel there, there's a budget that is  
8 dedicated to funding partners in the core states.  
9 Whereas, with light states, there's not a core  
10 staff person dedicated to that state alone.

11 Q And who decides if a state is a core state  
12 or a light state?

13 A Our effective leadership.

14 Q And who is your executive leadership?

15 A Cliff Albright is our executive director  
16 as well as LaTosha Brown, our chief doer is her  
17 title, and April Albright our legal counsel. They  
18 comprise our executive leadership.

19 Q Does BVM have physical offices in all of  
20 its core states?

21 A So I'm not absolutely sure about physical  
22 offices in all the core states. Now, we have a  
23 physical office that I utilize in Shreveport, in  
24 Louisiana, and we have a physical office  
25 headquartered in Atlanta. Those are the two I

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1 know for sure about.

2 Q And you said utilize that physical office  
3 in Shreveport.

4 Do you report to that office every day --

5 A No.

6 Q -- for work?

7 A No. All of BVM's employees work remote,  
8 so...

9 Q So Ms. Butler-Reed does she report to that  
10 physical office?

11 A She's our southern regional organizer, so  
12 she works in the southern half of the state, so  
13 no.

14 Q I see. And how long has BVM had that  
15 Shreveport office space?

16 A I've utilized it since 2021.

17 Q Do you know if BVM had the office before  
18 then?

19 A No, it did not.

20 Q So I believe you said previously that you  
21 and Ms. Butler-Reed are the BVM employees in  
22 Louisiana.

23 Are there any other BVM employees in the  
24 state?

25 A No.

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1 Q Okay, great.

2 So if you can read that first sentence to  
3 yourself, and I'm going to ask you a couple of  
4 questions about that. If you can just let me know  
5 once you're done reviewing.

6 A Okay. I've read it.

7 Q What does a constituency of individuals  
8 and organizations mean in the context of this  
9 case?

10 A Yes. So a constituency is essentially our  
11 partners, their communities, their members.

12 Q Okay. Does BVM have any individual  
13 members?

14 A No, we don't have members. We just have  
15 partners.

16 Q And how many partners does BVM have?

17 A Roughly, based on my last count, around  
18 50, in the upper 50s, or around 57 or 58 partners.

19 Q Is there a criteria to become a partner  
20 organization?

21 A So there is a process to become a partner  
22 that individual groups would go through and it  
23 looks different each time. Kind of how that  
24 partnership happens. But Louisiana has a process  
25 where we meet with our potential partners, and we

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1 kind of do an assessment of their capacity.

2 Because again, you know, a majority of the work  
3 that we do is capacity building, and so we assess  
4 their needs of our resources.

5 Q And when you say "we assess," is that you  
6 personally that's doing that assessment?

7 A So it's staff. So either myself or  
8 Keturah, the southern regional organizer, we'll  
9 conduct assessment or partner intake as we call  
10 the process.

11 Q Now, to become an official -- well, I'm  
12 going to say official partner in the sense that  
13 you're using the term.

14 Does an organization have to have members?

15 A No. You know, sometimes an organization  
16 will not have been formed yet, but they would like  
17 to build an organization because again we are a  
18 capacity building institute, and so we have the  
19 resources to help a group become an organization,  
20 so there are no requirements necessarily of what  
21 that organization has to look like. We do have  
22 organizations that are members, that do have  
23 members rather.

24 Q Okay. So if I was interested in becoming  
25 a partner with BVM and I didn't have an

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1 organization yet, what would you look for, like,  
2 for me to come into this assessment process? What  
3 would I need to have?

4 A You would really just need to understand  
5 what do you want to focus on, what is your  
6 community concern, and then we build from there.  
7 You know, capacity kind of looks different for  
8 different people and it can be defined in  
9 different ways. And so, you know, do you have the  
10 people or the access to people to help volunteer  
11 for a cause. You know, how easily will you be  
12 able to address the issue that you're most  
13 concerned about. We start there and then we help  
14 them build to be able to address the concern that  
15 they bring to the table.

16 A majority of the organizations that we  
17 work with are focused on increasing voter  
18 engagement in their community, and so that is a  
19 majority of what we deal with. However, there are  
20 a lot of community concerns and issues that are  
21 brought to us, and so we want -- our end goal is  
22 to be able to help an organization or a group be  
23 able to meaningfully and substantively address  
24 their issue of concern.

25 Q Now, does it have to be a specific issue

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1 of concern in order to be granted partnership  
2 status?

3 A No. It could be just a general concern  
4 about the state of their community. Or it could  
5 just -- they want to lend their talents or skills  
6 or time to helping our general mission, right, of  
7 increasing black voter turnout.

8 So, you know, as I mentioned earlier, it  
9 looks different, you know, based on the community  
10 or the group or the issue, and our end goal is to  
11 help them to address whatever general concern  
12 however they want to engage in helping us reach  
13 our ultimate goal or objective of increasing black  
14 voter turnout as well as black civic engagement.

15 Q So speaking about the overall mission of  
16 BVM, and I believe you've used the phrase engaging  
17 with the community.

18 What does BVM do to engage with its  
19 communities?

20 A So we support partner initiatives or  
21 events that they're planning, we help with the  
22 planning process if needed by the partner  
23 organization. One of our most well-known  
24 engagements is our bus tour that we conduct across  
25 the country. That looks different again. And so



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1 Q It wasn't all of them; it was part?

2 A So in terms of, like, our partner leaders  
3 that helped us to lead the mobilization, all of  
4 them are registered voters. However, you know,  
5 earlier we talked about, like, engagement and how  
6 we engage with people at the pep rally, we engage  
7 with people along the way. There are many people  
8 who we come into contact with who are not yet  
9 registered which is a part of the purpose of our  
10 tours is to come into contact with those who are  
11 not register, educate them, and register them to  
12 vote.

13 MS. HOLT: You can take down this exhibit.

14 BY MS. HOLT:

15 Q Ms. Ho-Sang, how has BVM been harmed by  
16 the legislative maps in this case?

17 MS. KEENAN: Objection to the extent it  
18 calls for a legal conclusion, but you can answer.

19 THE WITNESS: So, you know, there are a  
20 few ways that I view, you know, harm. And, you  
21 know, one way is that we had to spend a lot of  
22 time that we did not foresee on redistricting.  
23 And so my time, staff time, partner time, in  
24 addition, because of the outcome of the special  
25 session, we, you know, spend additional time

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1 really responding to that. You know, even before  
2 the maps became law and we -- our partners started  
3 to see them and became concerned about them, that  
4 is where the redistricting takeover and  
5 mobilization was born out of those concerns. That  
6 was not something that we entered 2022 saying,  
7 hey, we're going to do this massive mobilization  
8 to the capitol in the way that it happened. So,  
9 you know, we had to take away our focus from,  
10 like, our core, you know, our core mission which  
11 is increase black voter turnout to the polls to  
12 really focus on redistricting which there was a  
13 huge learning curve for me and our team around  
14 redistricting to begin with.

15 So I think apart of the harm is, you know,  
16 a diversion of our attention, our focus, and our  
17 resources because we did provide mini grants to  
18 partners that participated in the process. So  
19 there's kind of a financial harm in a way, too,  
20 because those funds could have been used for more  
21 general GOTV to really increase the number of  
22 registered voters in a community or to have more  
23 teachings, or, you know, kind of, like, really  
24 focus on that core piece, and so there's the  
25 financial aspect of it as well.

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1           And then another way is that when we go --  
2   you know, it was referenced in the transcript,  
3   when we talk to people a lot of people talk about  
4   how they feel that their vote does not count. The  
5   outcome of this redistricting process has made  
6   that sentiment even worse because now people --  
7   especially because the awareness has increased  
8   around it. Now people are like, well, now my vote  
9   really doesn't count, and so we have to really  
10   have a nuanced approach to how we organize because  
11   there is an increasing sentiment among the people  
12   who we want to engage with that their vote does  
13   not count, so...

14   BY MS. HOLT:

15           Q   Okay. So I'm going to try to break those  
16   down in the same three ways that I heard you break  
17   them down.

18           The first, what specific funding has been  
19   diverted due to these legislative maps?

20           A   So we provided mini grants to our partners  
21   to participate in the redistricting takeover  
22   because we did a mobilization from their home  
23   cities into Baton Rouge. Many of the partners  
24   that attended were not local to Baton Rouge, and  
25   so we wanted to make sure that they had the funds

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1 necessary to transport themselves, their members,  
2 and their community members that wanted to  
3 participate. We also brought the big bus for the  
4 redistricting takeover and there are expenses that  
5 are associated with rolling the bus because it's  
6 not headquartered -- it doesn't live in Louisiana,  
7 so there are expenses that are associated with  
8 that.

9 In addition to also lodging partners and  
10 we took on some of the responsibility of paying  
11 for lodging for our out-of-town partners during  
12 the redistricting takeover as well.

13 And so just to be kind of more concise,  
14 the mini grant funding that went to partners  
15 specific to the redistricting takeover, the  
16 expenses associated with the big bus rolling to  
17 Baton Rouge for the tour as well as the cost  
18 associated with lodging our partners, and the food  
19 and, you know, the cost of the events, and, you  
20 know, the event planners that we worked with to  
21 make sure that the event took place. So there  
22 were a lot of expenses, you know, around just that  
23 one mobilization, but there were also other events  
24 that we took part in with other partners leading  
25 up to the event where we did some cost sharing as

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1 well.

2 Q So all of the items you just listed are  
3 for that one two-day event in Baton Rouge,  
4 correct?

5 A Except for the latter half of what I just  
6 said, like leading into it.

7 Q Leading into it.

8 A Yes. There were a lot of expenses. And  
9 then when we give a grant, or when we provide a  
10 grant to our partner there, of course, within that  
11 was a line item for this particular event, but  
12 also just general outreach in their community  
13 around redistricting, the utilized those funds for  
14 that as well. And so I couldn't say that all of  
15 the funding went just specifically to the  
16 mobilization. There was a significant amount that  
17 did, but there were also expenses associated with  
18 just the whole redistricting process. The more we  
19 got involved, the more resolve. We had to do more  
20 outreach, more awareness. We even sent a  
21 broadcast text, which of course there are costs  
22 associated with broadcast texting, to get people  
23 engaged around the session. But also the  
24 follow-up after when we -- when our partners were  
25 urging the governor to veto the maps, so, you

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1 know, there were costs leading into the  
2 redistricting, there were costs during the  
3 redistricting takeover, and then there were costs  
4 after as well.

5 Q You mentioned a broadcast text.

6 A Yes.

7 MS. HOLT: And I'm going to ask the  
8 technician to, please, pull up document that's  
9 been previously marked as BVM LA LEG 977.

10 BY MS. HOLT:

11 Q Ms. Ho-Sang, is this that campaign that  
12 you were mentioning previously?

13 A This is a -- this is the text campaign  
14 that we did for the redistricting takeover.

15 Q Okay. And do you see the event date?

16 A Event date, February 8, 2022.

17 Q And was that before the legislative maps  
18 were passed?

19 A Yes.

20 Q And the launch date was for this campaign  
21 was February 2, 2022; is that correct?

22 A Yes.

23 MS. HOLT: Now, I'd like the tech to,  
24 please, turn to the second page of this PDF, and  
25 I'll give you a chance to review.

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1 Q Is that alignment a condition to receiving  
2 a grant?

3 A Yes. We grant to organizations that, from  
4 one perspective or another, will help to increase  
5 the black voter engagement and black civic  
6 participation.

7 Q Were there any specific grants that were  
8 not awarded due to these legislative maps?

9 MS. KEENAN: Objection to form.

10 MS. HOLT: Yeah, let me ask that a  
11 different way. That was a poor question.

12 BY MS. HOLT:

13 Q So were there any mini grant applications  
14 for other goals of BVM that were diverted to  
15 redistricting?

16 A Oh, I think I understand your question.  
17 We have a finite granting budget. When we grant  
18 money, that money is gone, and so that means less  
19 money for our other key purposes. And so there  
20 was a significant amount, I don't have an exact  
21 figure of how much we granted for redistricting,  
22 but there was a significant amount of granting  
23 that did go towards redistricting.

24 Q And you said there is a specific granting  
25 amount. Does that change from year to year?

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1           A   Insignificantly, but it does change.  It  
2   has changed during my time.

3           Q   Do you have an example of a specific grant  
4   that wasn't -- that didn't make it through the  
5   process because the funds were already fully  
6   disbursed?

7           A   No, I don't have a grant that I can refer  
8   to, no.

9           Q   Okay.  Now, in terms of a generally  
10   diversion of resources that you've talked about,  
11   has BVM's -- (connectivity interruption.)

12                  So in terms of a general diversion of  
13   resources, has BVM's Get Out The Vote initiatives  
14   continued?

15           A   Yes.

16           Q   So they haven't ceased because this  
17   lawsuit is pending?

18           A   No, they have not.

19           Q   And has BVM started new Get Out The Vote  
20   initiatives in Louisiana as this lawsuit has been  
21   pending?

22           A   Yes.

23           Q   And what are those initiatives?

24           A   So we are conducting GOTV for our upcoming  
25   gubernatorial election, and we've had one bus tour



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1 but it's part of the Shreveport community. So  
2 there are many places that are target areas across  
3 the state that contain partners, and our partners  
4 are involved in the work that happens in those  
5 areas. And so as a matter of supporting our  
6 partners, we expanded to those areas as well.

7 Q Okay. So you've listed certain parishes  
8 for me. Does BVM operate in every single parish  
9 in Louisiana?

10 A No.

11 Q How many parishes are covered in full?

12 A Approximately inclusive of our target,  
13 plus the additional parishes that we picked up,  
14 we're -- we most likely have partners in at least  
15 25 parishes that we work with.

16 Q Okay. So 25 --

17 A That's an approximate number.

18 Q All right. Now, switching to the mini  
19 grants, has All Streets, All People received  
20 grants from the BVM?

21 A Yes.

22 Q About how many grant?

23 A ASAP has received three to five grants  
24 from BVM.

25 Q And what years were those received?