

Exhibit 12

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION

4 THE SOUTH CAROLINA)
5 STATE CONFERENCE OF)
6 THE NAACP, et al.,)

7 Plaintiffs,)

Case No. 3:21-CV-03302-MGL-
TJH-RMG

8 vs.)

9 THOMAS C.)
10 ALEXANDER, et al.,)

11 Defendants.)
12)
13)

14 Videotaped Remote Deposition of
15 SENATOR GEORGE EARLE CAMPSER, III
16 (Taken by Plaintiffs)
17 Isle of Palms, South Carolina
18 Friday, August 5, 2022
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20
21
22
23

24 Reported in Stenotype by
25 Lauren M. McIntee, RPR, CRR
Transcript produced by computer-aided transcription

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ALSO PRESENT:

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Michael Kirby, Videographer (via Zoom)

1 VIDEOTAPED REMOTE DEPOSITION OF SENATOR GEORGE EARLE
2 CAMPSSEN, III, a witness called on behalf of Plaintiffs,
3 before Lauren M. McIntee, Registered Professional
4 Reporter, Certified Realtime Reporter, and Notary
5 Public, in and for the State of North Carolina, in Isle
6 of Palms, South Carolina, on Friday, August 5, 2022,
7 commencing at 9:10 a.m.

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1 THE VIDEOGRAPHER: We're on the record at
2 9:10 a.m. This is the deposition of Senator George
3 E. Campsen, III. This deposition is being held on
4 August 5th, 2022. The court reporter is Lauren
5 McIntee. The videographer is Michael Kirby. The
6 court reporter will now do the swearing.

7 THE COURT REPORTER: Participating attorneys
8 recognize that all parties, including the witness
9 and court reporter, are participating remotely. In
10 lieu of an oath administered in person, the witness
11 will verbally declare that their testimony in this
12 deposition is under penalty of perjury and will be
13 the truth, the whole truth, and nothing but the
14 truth.

15 Counsel stipulate that all objections to the
16 remote participation are waived. Please state your
17 name and indicate your agreement on the record.

18 MR. TRAYWICK: Lisle Traywick agrees on
19 behalf of the Senate defendants.

20 MR. CUSICK: John Cusick agrees behalf of
21 plaintiffs.

22 MS. TRINKLEY: Jane Trinkley on behalf of the
23 Election defendants.

24 THE COURT REPORTER: If that's all, counsel,
25 you may proceed.

1 MR. CUSICK: Thank you.

2 EXAMINATION

3 BY MR. CUSICK:

4 Q. Good morning, Senator Campsen. How are you
5 doing today?

6 A. Good morning. Doing fine. Thank you.

7 Q. My name is John Cusick. I'm one of the
8 attorneys representing the plaintiffs in this lawsuit,
9 The South Carolina State Conference of the NAACP versus
10 Alexander. If you could please state your full name for
11 the record, spelling your last name.

12 A. George Earle Campsen, III. C-A-M-P-S-E-N.

13 Q. Great. Thank you.

14 MR. CUSICK: And I'd like to just briefly go
15 around the virtual room, if you will, for any
16 attorneys planning to make an appearance today. And
17 we can begin with House defendants.

18 Hearing none, I will turn to the Election
19 defendants, Ms. Trinkley.

20 MS. TRINKLEY: We're here.

21 MR. CUSICK: Great. And anyone else from the
22 Senate defendants?

23 MR. TRAYWICK: Lisle Traywick here on behalf
24 of the Senate defendants, and I believe John Gore is
25 participating remotely as well.

1 A. I think I probably did, yeah. I'm not sure,
2 but I really can't recall, but perhaps.

3 Q. Based on your understanding, if you
4 supported --

5 A. You can't -- keeping Charleston whole is a
6 misnomer because Charleston wasn't whole in the first
7 place. It hadn't been whole since 1992. So that is a
8 misnomer. You're not keeping it whole. It's not whole.
9 It wasn't whole to begin with.

10 Q. For people you reached out to for Beaufort to
11 be in CD1 and to be whole, wouldn't they also have had
12 an interest in the Senate Amendment 2 plan that kept
13 Beaufort County whole, kept it in CD1?

14 MR. TRAYWICK: Object to the form of the
15 question.

16 THE WITNESS: You want me to answer that now?

17 MR. TRAYWICK: Yeah, sorry. You can answer.

18 A. Well, I -- I think I verbally communicated to
19 her like that on the phone, that there was -- there's
20 another amendment that will do that, but that's not
21 going to go with Berkeley County, the one with the
22 tri -- and Dorchester and the Tri-County area. They're
23 going to protest that. And at this point, I don't
24 even -- I'm not even sure that Senator Harpootlian's
25 amendment had been formulated yet. I'm not -- I can't

1 recall. But I knew, at least I knew in the abstract
2 that that may happen, but that's probably not going to
3 fly because you're going to have a big pushback from
4 Berkeley and Dorchester County.

5 BY MR. CUSICK:

6 Q. But if -- if the primary purpose of folks who
7 were interested in Beaufort County being in CD1, from
8 your understanding and interactions, that would have
9 also been consistent with supporting Senate Amendment 2
10 that did that same thing --

11 A. No. Because I told --

12 Q. -- regardless --

13 A. No, because in my political judgment, that
14 wasn't going to pass. And so, because you would have a
15 big pushback from those -- from those counties. And so
16 don't vote for something that at the end of the day is
17 probably not going to pass. Vote for something that
18 keeps Beaufort in the 1st that will pass.

19 Q. But this is before you had a public hearing
20 on either of the two amendments, correct?

21 A. I'm not sure. I can't remember the -- the
22 dates that we had hearings. Perhaps it was.

23 Q. So when you said --

24 A. But I knew this was coming. I mean, I knew
25 what was coming. I had a sense of what was coming.

1 This -- as I recall, again I hadn't seen the whole text
2 chain, but I think in that chain, the first thing I do
3 is let -- is let Xiaodan know that, y'all testified at
4 the House. You can't sit on your laurels because the
5 Senate is a different body making a different plan. You
6 need to testify in the Senate too. Make -- make the
7 same case you made to the Senate that you made to the
8 House. Most people don't understand the process, and so
9 I just knew that they were interested enough to show up
10 and testify in the House; then you -- you need to
11 testify in the Senate.

12 Q. So was it your understanding before the
13 Senate Amendment 2 plan was proposed to members of the
14 public that there was no scenario in which it would --
15 it would pass the Senate?

16 A. It was my judgment, my political judgment
17 that you would have a hard time passing a plan that put
18 Berkeley, Dorchester in the 7th district with the Pee
19 Dee and the Grand Strand. There is no community of
20 interest whatsoever, whereas Charleston, Berkeley,
21 Dorchester are -- they're even -- they're called the
22 Tri-County area. They've been the Tri-County area for
23 well over a century. We have the Tri-County Association
24 of Realtors. We have the Tri-County Council of
25 Governments. You have Tri-County Chamber of Commerce.

1 It's -- it's the port. It's the, now the industrial
2 logistics and distribution facilities up I-26 in the
3 Nexton area and Summerville.

4 It's an integrated economic unit. And I just
5 knew that there would be a big pushback on Berkeley and
6 Dorchester for -- for taking them out of the 1st and
7 putting them into a district with Horry County and --
8 and -- and the Pee Dee.

9 Q. And so --

10 A. With no connection whatsoever. No community
11 of interest whatsoever there.

12 Q. And so here the text string continues. This
13 is the second one that was produced. Do you see that?

14 A. Yeah, I can see it, but I hadn't read it. I
15 didn't get to read it.

16 Q. Yeah, I'm not -- I mean, I'm not going to ask
17 you questions. I just wanted to show you that -- to
18 just -- so you can see that -- the full thread as I'm
19 scrolling through. Unfortunately, there's no date on
20 this one based on the screenshot, just the time. But I
21 just want you to see that one as well.

22 A. Okay.

23 Q. This one has a January 13th one. It looks
24 like it might -- might have been part of the other one
25 that was -- was not fully clipped.