

IN THE MATTER OF

**Georgia State Conference of the
NAACP, et al
vs
Kemp**

Transcript of Deposition of

R. Brian Strickland

On January 26, 2018

*Reported by Joel P. Moyer
Certified Court Reporter*



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R. Brian Strickland

Georgia State Conference of the NAACP, et al vs Kemp

January 26, 2018

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THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA STATE CONFERENCE OF THE NAACP,
as an organization; LAVELLE LEMON, MARLON
REID, LAURETHA CELESTE SIMS, PATRICIA
SMITH, COLEY TYSON,
NAACP Plaintiffs,

AUSTIN THOMPSON, WAYNE SWANSON, DARRYL PAYTON,
AUDRA CUNNINGHAM, SABRINA MCKENZIE, JAMIDA
ORANGE, ANDREA SNOW, SAMMY ARREYMBI, LYNNE
ANDERSON, CORETTA JACKSON,
Thompson Plaintiffs,

vs. CASE NO. 1:17-cv-01427-TCB-WSD-BBM

BRIAN KEMP, in his official capacity as
Secretary of the State for the State of
Georgia,
Defendant.

- - -

Videotaped Deposition of
R. BRIAN STRICKLAND,

Taken by Gregory D. Phillips,

Before Joel P. Moyer,
Certified Court Reporter,

At the Offices of
Balch & Bingham LLP,
Atlanta, Georgia,

On Friday, January 26, 2018,
Beginning at 9:24 a.m. & ending at 4:27 p.m.

- - -

Volume of Testimony
(Exhibits Contained in Separate Volume)

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<p>7</p> <p>1 January 26, 2018</p> <p>2 9:24 a.m.</p> <p>3 (Whereupon the reporter provided a written</p> <p>4 disclosure to all counsel pursuant to</p> <p>5 Article 8.B. of the Rules and Regulations</p> <p>6 of the Board of Court Reporting.)</p> <p>7 THE VIDEOGRAPHER: We're now on the</p> <p>8 video record. This is the beginning of video</p> <p>9 file number one. The time is 9:24 a.m., and</p> <p>10 the date is January 26th, 2018.</p> <p>11 Will the court reporter please swear</p> <p>12 in the witness.</p> <p>13 R. BRIAN STRICKLAND,</p> <p>14 being first duly sworn, was examined and</p> <p>15 testified as follows:</p> <p>16 EXAMINATION</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q Good morning, Senator Strickland.</p> <p>19 A Morning.</p> <p>20 Q We met off the record, but my name</p> <p>21 is Greg Phillips, and we represent the</p> <p>22 Plaintiffs in this action.</p> <p>23 I'm going to be taking your</p> <p>24 deposition today. Please -- I know that we had</p> <p>25 a little mix-up about the start time, and I</p>	<p>9</p> <p>1 Representatives, and I was elected on January</p> <p>2 9th of this year to the State Senate. And I</p> <p>3 was sworn in a week ago this past Tuesday, I</p> <p>4 believe.</p> <p>5 Q I know this may be confusing, but</p> <p>6 I -- when I say "your district" during the</p> <p>7 deposition today, I'm going to be referring to</p> <p>8 your district as a member of the House of</p> <p>9 Representatives.</p> <p>10 A Okay.</p> <p>11 Q Not to your current senatorial</p> <p>12 district.</p> <p>13 A Okay.</p> <p>14 Q Of course, if I ask a question which</p> <p>15 requires you to talk about your senatorial</p> <p>16 district, please, just tell me.</p> <p>17 A I'll try to clarify.</p> <p>18 Q Yeah. Do you own any other property</p> <p>19 in Georgia?</p> <p>20 A No.</p> <p>21 Q Is there any reason you can't give</p> <p>22 your best testimony today?</p> <p>23 A No.</p> <p>24 Q Have you ever been deposed before?</p> <p>25 A I have not.</p>
<p>8</p> <p>1 apologize for that, but we'll try to be as</p> <p>2 efficient as possible.</p> <p>3 Could you please state and spell</p> <p>4 your full name for the record?</p> <p>5 A It's Robert Brian Strickland,</p> <p>6 R-O-B-E-R-T, B-R-I-A-N, S-T-R-I-C-K-L-A-N-D.</p> <p>7 Q And what is the address of your</p> <p>8 current residence?</p> <p>9 A McDonough,</p> <p>10 Georgia</p> <p>11 Q And is that -- what county is that</p> <p>12 in?</p> <p>13 A Henry County.</p> <p>14 Q And so that -- is it correct that</p> <p>15 your residence is in your district?</p> <p>16 A That's correct. Hope so.</p> <p>17 Q You are now a senator; is that</p> <p>18 correct?</p> <p>19 A That's correct.</p> <p>20 Q But until recently, you were a</p> <p>21 member of the Georgia House of Representatives?</p> <p>22 A Yes.</p> <p>23 Q When did that change?</p> <p>24 A I believe it was December 2nd of</p> <p>25 2017 that I resigned from the House of</p>	<p>10</p> <p>1 Q Have you ever given testimony under</p> <p>2 oath at a trial or an arbitration or in any</p> <p>3 other setting?</p> <p>4 A Yes.</p> <p>5 Q And what, what has that -- have you</p> <p>6 done it more than once?</p> <p>7 A Yes, and it's always been as counsel</p> <p>8 for someone testifying on the issue of</p> <p>9 attorney's fees or any other issue as a lawyer</p> <p>10 in a state action testifying on issues that are</p> <p>11 required as attorneys to testify to.</p> <p>12 Q But you have not testified -- is it</p> <p>13 correct that you have not previously testified</p> <p>14 on political issues with regard to the state of</p> <p>15 Georgia?</p> <p>16 A That's correct.</p> <p>17 Q Since you haven't been deposed</p> <p>18 before, I'll go quickly, I hope, through the</p> <p>19 general ground rules of a deposition. I'm sure</p> <p>20 your counsel has given you some information</p> <p>21 about this, but I just think for the purpose of</p> <p>22 the record I should do this.</p> <p>23 A Okay.</p> <p>24 Q So I'll try to be efficient.</p> <p>25 First, as you can see, there's a</p>

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<p>11</p> <p>1 court reporter preparing a transcript of our 2 conversation. Two things about that: It's 3 important we not talk over each other so that 4 the court reporter can get a clear record. So 5 if you'll let me finish my questions before you 6 respond, and I'll let you respond before I ask 7 you another question. At least both of us will 8 try to do that. Do you understand? 9 A Yes. 10 Q It's important that you answer each 11 question orally. The reporter can't record a 12 nod or an uh-huh or at least cannot do so to 13 make a clear record. Do you understand that? 14 A Yes. 15 Q And I can tell you that every 16 witness does occasionally nod or say huh-uh. 17 It's not a big deal. But if do you that, I 18 will simply ask you to restate your answer 19 orally. 20 A Okay. 21 Q If I ask a question that you don't 22 understand, you should say so, and I'll try to 23 clarify my question. But if you don't ask me 24 to rephrase or say you don't -- or say you 25 don't understand, I'll assume you do understand</p>	<p>13</p> <p>1 A No. 2 Q So there's nothing you plan to refer 3 to during the deposition other than what I hand 4 you? 5 A Correct. 6 Q Pro forma, have you ever been 7 arrested? 8 A No. 9 Q When did you first become aware of 10 the litigation, this litigation, approximately? 11 A I really don't remember. When was 12 it filed? 13 Q I'm trying to remember. 14 MR. KHOURY: I actually don't know. 15 Q Last year, early last year. 16 A Okay. Sometime after it was filed, 17 there was a reporter that reached out to me, I 18 want to say it was a local newspaper, I think 19 it was a local newspaper, and asked me my 20 thoughts on it. And that was probably the 21 first time I think I came aware of the suit. 22 Q Do you recall, do you recall which 23 reporter it was? 24 A I do not. 25 Q And you don't recall the</p>
<p>12</p> <p>1 the question. Is that fair? 2 A Okay. 3 Q If your answer depends on a time 4 frame, would you please let me know that time 5 frame so that we can get an accurate and 6 complete record? 7 A Okay. 8 Q Is that -- if you need a break at 9 any time, just say so for any reason. We -- 10 the rules of the deposition generally are, 11 unless it's a question of attorney-client 12 privilege, we will have you finish your answer 13 to the question, and then we'll discuss when we 14 can take a break. 15 It will usually be very soon after 16 you request it. Is that fair? 17 A Okay. 18 Q Your attorney may object to my 19 questions or some of them. Generally, you have 20 to answer the question, if you understand it, 21 unless you're instructed not to do so. Do you 22 understand that? 23 A Yes. 24 Q Did you bring any documents with you 25 today?</p>	<p>14</p> <p>1 organization for which he was calling? 2 A It was a local paper. I want to say 3 it was the Henry Herald, and I think they ran 4 an article that had a quote from me in it, so 5 we could probably find that if it's out there. 6 But it was a local -- I know it was a local 7 reporter, and that was the only person that 8 asked me about the case. 9 Q Do you recall what you told him 10 about the case? 11 A My memory of it was, they -- they 12 asked my general thoughts on redistricting 13 legislation, and I said I've never given it too 14 much thought. It was a noncontroversial thing 15 that passed with bipartisan support in both 16 chambers. I know at least in the House it was 17 unanimous. 18 And so I didn't have a lot of memory 19 of it, and my thoughts were this -- any lawsuit 20 over this was just politically driven to try to 21 create divisions in our state since there 22 wasn't a division at the time. 23 Q And when you say there was a 24 division in the state, what do you mean by 25 that?</p>

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<p style="text-align: right;">15</p> <p>1 A There was no division in the state.</p> <p>2 Q Oh, I'm sorry. I misheard you.</p> <p>3 A Yeah. There was no division over</p> <p>4 the issue when it -- back in whatever year the</p> <p>5 bill passed. There was no controversy over it</p> <p>6 at the time.</p> <p>7 Q Well, there was in the Senate;</p> <p>8 correct?</p> <p>9 A I don't know about the Senate.</p> <p>10 Q Okay.</p> <p>11 A I know in the House everyone voted</p> <p>12 yes on it.</p> <p>13 Q But you know that the Senate was not</p> <p>14 unanimous; is that correct?</p> <p>15 A I don't know the answer to that.</p> <p>16 Q Other than with your attorney, your</p> <p>17 counsel, have you spoken to anyone about your</p> <p>18 testimony today, anybody else?</p> <p>19 A No.</p> <p>20 Q Have you spoken with Mr. -- sorry,</p> <p>21 Ms. Wright or Mr. O'Connor about the</p> <p>22 deposition?</p> <p>23 A I have not spoken with Mr. O'Connor,</p> <p>24 but I did see Ms. Wright sometime at the</p> <p>25 legislative office building in the cafeteria.</p>	<p style="text-align: right;">17</p> <p>1 Representative Nix, and he said the exact same</p> <p>2 thing Ms. Wright said, that it was an all-day</p> <p>3 affair.</p> <p>4 Q Right. But --</p> <p>5 A And so I know I did discuss it with</p> <p>6 him. I think actually I asked him if he had</p> <p>7 been deposed when I -- after I spoke with</p> <p>8 Ms. Wright. He didn't say anything to me.</p> <p>9 And he said, yes, it was an all-day</p> <p>10 affair.</p> <p>11 Q Did you have any substantive</p> <p>12 conversations at all with any of the people --</p> <p>13 A No.</p> <p>14 Q -- I've mentioned about your</p> <p>15 testimony today?</p> <p>16 A No.</p> <p>17 Q Or with either the Speaker or the</p> <p>18 Speaker's staff, Speaker of the House or the</p> <p>19 Speaker's staff?</p> <p>20 A No.</p> <p>21 Q You said that you had a brief</p> <p>22 conversation, nonsubstantive, with Ms. Wright;</p> <p>23 is that correct?</p> <p>24 A Yes.</p> <p>25 Q Have you had any such conversations</p>
<p style="text-align: right;">16</p> <p>1 I want to say it was last week. I'm not sure</p> <p>2 when y'all deposed her, but she -- whenever she</p> <p>3 had just been deposed.</p> <p>4 And she asked me if I had been</p> <p>5 deposed yet. And I said, no, I don't know when</p> <p>6 they're going to depose me.</p> <p>7 And I asked her how it went, and she</p> <p>8 said it was the full seven hours, and that was</p> <p>9 the extent of our conversation.</p> <p>10 Q Okay. Have you spoken -- I'm just</p> <p>11 going to run through some of the individuals</p> <p>12 who have been deposed so far in this matter.</p> <p>13 And if you can just bear their names in mind,</p> <p>14 and then I'm going to ask you if you've had any</p> <p>15 conversations with any of them about the</p> <p>16 depositions --</p> <p>17 A Okay.</p> <p>18 Q -- that they had. These are</p> <p>19 Representatives Nix, Efration, Chandler,</p> <p>20 Rutledge, Welch. Those are the people I'm</p> <p>21 thinking of.</p> <p>22 A I did.</p> <p>23 Q Or Welch has not been deposed yet,</p> <p>24 nor has Mr. Chandler -- Rutledge, but --</p> <p>25 A That same day I believe I did see</p>	<p style="text-align: right;">18</p> <p>1 or any substantive conversations with anyone,</p> <p>2 other than Ms. Wright, who is in the</p> <p>3 Reapportionment Office?</p> <p>4 A About?</p> <p>5 Q About the, I'm sorry, about the</p> <p>6 deposition?</p> <p>7 A No.</p> <p>8 Q Other than the discussion with the</p> <p>9 local reporter that you mentioned earlier, have</p> <p>10 you had -- have you discussed this litigation</p> <p>11 with any member of the press?</p> <p>12 A No, not that I'm aware of. I</p> <p>13 don't -- no.</p> <p>14 Q And have you discussed your</p> <p>15 testimony or the deposition generally with</p> <p>16 anyone else? A family member, a friend, for</p> <p>17 example?</p> <p>18 A No, other than my wife who knows</p> <p>19 that I had to come up here today, but that's</p> <p>20 all she knows.</p> <p>21 Q Did you review documents in</p> <p>22 preparation for your deposition?</p> <p>23 A No, but I did search a second time</p> <p>24 to see if I had any documents. But there was</p> <p>25 nothing I had to review, so no.</p>

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<p style="text-align: right;">19</p> <p>1 Q Okay. How many times did you search</p> <p>2 your documents to determine if you had any</p> <p>3 documents that you understand were relevant to</p> <p>4 this matter?</p> <p>5 A Well, I know that we had the -- my</p> <p>6 House email account was searched. I'm not sure</p> <p>7 when that actually occurred, but it was</p> <p>8 searched. I personally had my law office email</p> <p>9 account searched, and I -- I had it searched by</p> <p>10 someone from our IT department.</p> <p>11 And then I did a personal search</p> <p>12 myself just to make sure there wasn't anything</p> <p>13 else. I did that last week when this was -- or</p> <p>14 this week when this was scheduled.</p> <p>15 And then I personally twice have</p> <p>16 searched through my office documents. The</p> <p>17 reason I did it twice, I just moved offices</p> <p>18 last week and they gave me a second chance. My</p> <p>19 wife found another stack of documents she told</p> <p>20 me to go through because we're trying to clean</p> <p>21 things out.</p> <p>22 And I went through another stack of</p> <p>23 documents and -- to make sure I didn't have</p> <p>24 anything on any of these issues that might be</p> <p>25 relevant to the subpoena that you sent.</p>	<p style="text-align: right;">21</p> <p>1 A No.</p> <p>2 Q Mr. O'Connor?</p> <p>3 A No.</p> <p>4 Q Mr., and I apologize if I'm</p> <p>5 butchering the name, Strangia?</p> <p>6 A I don't know who that is. I haven't</p> <p>7 read any deposition transcripts.</p> <p>8 Q Representative Nix?</p> <p>9 A No.</p> <p>10 Q Representative Chandler?</p> <p>11 A No.</p> <p>12 Q Have you read the Complaint in this</p> <p>13 case?</p> <p>14 A No.</p> <p>15 Q Have you read any pleading in this</p> <p>16 case?</p> <p>17 A No.</p> <p>18 Q Did you look at any expert report in</p> <p>19 preparation for your deposition?</p> <p>20 A No.</p> <p>21 Q And just to make sure we're both on</p> <p>22 the same page, we provided -- in this matter we</p> <p>23 provided expert reports by a Dr. Chen, a</p> <p>24 Dr. Webster, and a Dr. McQueary. Did you read</p> <p>25 any of those?</p>
<p style="text-align: right;">20</p> <p>1 Q Is it your general understanding</p> <p>2 that the documents that you provided to counsel</p> <p>3 were produced?</p> <p>4 A I haven't provided any documents to</p> <p>5 counsel.</p> <p>6 Q Oh, you have not?</p> <p>7 A No.</p> <p>8 Q So you didn't find any relevant --</p> <p>9 any documents that you consider to be relevant</p> <p>10 in your search?</p> <p>11 A Correct. There -- I believe there</p> <p>12 was something possibly from my -- I don't know</p> <p>13 if there was anything from my House email</p> <p>14 account, but I -- not that I'm aware of.</p> <p>15 Q Did you -- when you were searching,</p> <p>16 did you search both hard copy and electronic</p> <p>17 materials?</p> <p>18 A Yes.</p> <p>19 Q In preparation for your deposition</p> <p>20 today, have you read the transcripts of any</p> <p>21 deposition that you understood were taken --</p> <p>22 was taken in this case?</p> <p>23 A No.</p> <p>24 Q So you haven't read the deposition</p> <p>25 transcript of Ms. Wright?</p>	<p style="text-align: right;">22</p> <p>1 A No.</p> <p>2 Q Did your attorney or anyone else ask</p> <p>3 you to preserve relevant documents? I don't --</p> <p>4 and when I'm asking that question, I'm just</p> <p>5 looking for a yes or a no. I don't want you to</p> <p>6 reveal attorney-client communications.</p> <p>7 A Well, yes, I was -- I mean, there</p> <p>8 was -- I think at some point you tried to serve</p> <p>9 a subpoena to me which I was able to get a copy</p> <p>10 of and -- but before that, there was something</p> <p>11 sent, yes. I'm -- I was thinking about the</p> <p>12 subpoena.</p> <p>13 When the lawsuit was first filed, I</p> <p>14 guess it was someone from the Attorney</p> <p>15 General's office in a letter to me asking me to</p> <p>16 preserve documents, so yes.</p> <p>17 Q And did you do so?</p> <p>18 A Yes. Well, there were no documents</p> <p>19 to preserve, but I -- that was the point where</p> <p>20 I initiated -- well, I think at some point</p> <p>21 after that is when I initiated the first search</p> <p>22 for documents. But, yes, there were no</p> <p>23 documents that were not preserved, if I said</p> <p>24 that right.</p> <p>25 Q Did the Georgia House assign you an</p>

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<p style="text-align: right;">23</p> <p>1 email address?</p> <p>2 A Yes.</p> <p>3 Q And is -- what is that? What was</p> <p>4 that email? Well, let me ask the --</p> <p>5 A Lead me on it, please.</p> <p>6 Q Exactly. Is your</p> <p>7 government-assigned email address</p> <p>8 brian.strickland@house.ga.gov?</p> <p>9 A Yes, it was until I was sworn into</p> <p>10 the Senate.</p> <p>11 Q Did you have any -- excuse me. Did</p> <p>12 you have any other email account when you were</p> <p>13 in the House?</p> <p>14 A For the House or personal or --</p> <p>15 Q Either.</p> <p>16 A Yes.</p> <p>17 Q What, what email addresses did you</p> <p>18 have?</p> <p>19 A I have a work email address that is</p> <p>20 bstrickland@smithwelchlaw.com, and I have a</p> <p>21 personal email address which is</p> <p>22 rbrianstrickland@gmail.com.</p> <p>23 Q Now, is it correct that you are a</p> <p>24 lawyer?</p> <p>25 A Yes.</p>	<p style="text-align: right;">25</p> <p>1 Q Do you have a practice in terms of</p> <p>2 deletion of emails from your various accounts?</p> <p>3 A Yes. I have a practice, not</p> <p>4 necessarily to my House account because it's,</p> <p>5 it's overwhelming at times, but I try with my</p> <p>6 personal work account -- I actually don't check</p> <p>7 my Gmail account. It's just there. I use</p> <p>8 for -- when I have to give an account for</p> <p>9 something advertisement-wise or signed up for</p> <p>10 something, so I don't even look at it.</p> <p>11 But I try to at least once a month</p> <p>12 go through and delete emails, stuff I've</p> <p>13 already taken care of. But I have a -- also I</p> <p>14 don't actually ever permanently delete anything</p> <p>15 because it all goes to a deleted folder in case</p> <p>16 I have to look it up again. It's my fallback.</p> <p>17 So I don't think I've ever</p> <p>18 permanently deleted any emails.</p> <p>19 Q From any of your accounts?</p> <p>20 A Not that I'm aware of.</p> <p>21 Q Do you keep a calendar?</p> <p>22 A Yes.</p> <p>23 Q And is that electronic or --</p> <p>24 A It is electronic. It is kept for</p> <p>25 me. I'm not sure how it all works, but I've, I</p>
<p style="text-align: right;">24</p> <p>1 Q And are you -- do you currently have</p> <p>2 a private practice?</p> <p>3 A Yes. I practice with a firm.</p> <p>4 Q And what type of law do you</p> <p>5 practice?</p> <p>6 A Mainly civil litigation, general</p> <p>7 litigation, pretty general practice.</p> <p>8 Q Do you -- are you in any case</p> <p>9 represent the State of Georgia?</p> <p>10 A No.</p> <p>11 Q Or any agency of the State?</p> <p>12 A I have represented the Henry County</p> <p>13 Water Authority, which I guess you could argue</p> <p>14 is instrumentality of the State. I don't</p> <p>15 recall ever representing any other governmental</p> <p>16 body.</p> <p>17 Q Have you ever represented any entity</p> <p>18 in the state of Georgia, any governmental</p> <p>19 entity in the state of Georgia, with regard to</p> <p>20 issues relating to redistricting?</p> <p>21 A No.</p> <p>22 Q Have you ever represented any,</p> <p>23 anyone else in connection with matters related</p> <p>24 to redistricting?</p> <p>25 A No.</p>	<p style="text-align: right;">26</p> <p>1 have a -- I think I have a Gmail calendar that</p> <p>2 is used -- my wife uses it and now my assistant</p> <p>3 at the Capitol just started using it. And then</p> <p>4 I have a work calendar that corresponds with</p> <p>5 that somehow through my work program. I don't</p> <p>6 know how that works.</p> <p>7 Q Did you search -- did you search</p> <p>8 through any of your calendars to determine</p> <p>9 whether there was anything on those calendars</p> <p>10 that might be relevant to this matter?</p> <p>11 A Yes.</p> <p>12 Q And did you find anything?</p> <p>13 A No.</p> <p>14 Q Do you know how long those calendars</p> <p>15 are preserved?</p> <p>16 A I don't know, but I know that it</p> <p>17 goes back since I first started practicing law,</p> <p>18 so at least -- because I've looked back for</p> <p>19 things to point -- a point of reference in</p> <p>20 cases, and it goes at least back to 2009.</p> <p>21 Q And I'm sorry. I may have missed</p> <p>22 this, and I apologize if I did. You have a,</p> <p>23 you have a House calendar that you use purely</p> <p>24 for the House of Representatives?</p> <p>25 A No, I do not for the House.</p>

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<p style="text-align: right;">27</p> <p>1 Q And -- okay. Do you have a cell 2 phone? 3 A Yes. 4 Q Do you use it to text? 5 A Yes. 6 Q Do either of the following numbers 7 belong to you: 404-427-28 -- excuse me, 2880? 8 A That's my cell phone number. 9 Q And does this number belong to you: 10 It is 706-656-7954? 11 A No. 12 Q Does anyone besides you have access 13 to your phone? 14 A No, other than my wife if she wants 15 it. 16 Q Did you search your phone for text 17 messages that might be responsive to this 18 matter? 19 A Yes, but there -- there would not be 20 any way because my phone has been reset. I 21 have issues with storage on my phone, and so I 22 had my phone set with text messages in 23 particular to delete every 30 days because my 24 phone fills up. 25 Q Excuse me. Is it your practice when</p>	<p style="text-align: right;">29</p> <p>1 matter? 2 A Yes. 3 Q And did you find anything? 4 A No. 5 Q I'm going to try to do the 6 biographical part of this deposition as 7 efficiently as possible, so I'm going to hand 8 you certain biographies that we were able to 9 locate on the Internet. 10 A Okay. 11 Q And basically my question, my 12 overall question, will be are they accurate. 13 A Okay. 14 (Whereupon documents were identified as 15 Plaintiff's Exhibit 272, Plaintiff's 16 Exhibit 273, Plaintiff's Exhibit 274, 17 Plaintiff's Exhibit 275, and Plaintiff's 18 Exhibit 276.) 19 Q So I'm going to show you a document 20 that's been previously marked as Exhibit 272. 21 I'm going to give you all of these in turn -- 22 now so that we -- would you like a copy? 23 MR. STRICKLAND: If you have it, 24 yes. 25 MR. PHILLIPS: Do you need get a</p>
<p style="text-align: right;">28</p> <p>1 attending meetings or, for that matter, 2 immediately after meetings to take notes of the 3 meetings? 4 A It depends on what the meeting is. 5 Q It varies? 6 A Uh-huh (affirmative). 7 Q Sorry. You have to answer verbally. 8 A Yes. 9 Q When you do take notes, do you take 10 paper notes or electronic notes? 11 A Paper notes. 12 Q And do you -- when you take paper 13 notes, do you preserve those notes anywhere? 14 A If I need them for something in the 15 future. 16 Q And so would those be -- would those 17 that are -- you save be stored or have been 18 stored in your -- at your office, 19 Representative's office? 20 A Yes, yeah, there would have been. 21 If it was anything dealing with State House 22 functions, it would have been kept in my State 23 House office. 24 Q And did you search whatever 25 hard-copy notes you had with regard to this</p>	<p style="text-align: right;">30</p> <p>1 copy? 2 THE COURT REPORTER: I'll just 3 collect the stickered. 4 MR. PHILLIPS: You'll use the -- 5 okay. 6 THE COURT REPORTER: Yep. 7 Q So this was previously marked as 8 272. 9 I'm going to give you a document 10 that was previously marked as Plaintiff's 11 Exhibit 273, which is Brian Strickland's 12 Biography, The Voter's Self-Defense System. 13 A document previously marked as 14 Exhibit 274. I'm sorry. These are not 15 previously marked. I apologize. I've marked 16 these for identification only. So 272, 273, 17 and 270 -- and this now, 274, are not 18 previously marked but are being marked for 19 identification in this deposition. I apologize 20 for the confusion. 21 And then I'm going provide you a 22 document that's been marked for identification 23 labeled Plaintiff's Exhibit 275. This appears 24 to be a document generated from your website or 25 your firm's website.</p>

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<p style="text-align: right;">31</p> <p>1 The document labeled -- that I've</p> <p>2 labeled for identification as Exhibit 276</p> <p>3 appears to be a biography, Brian Strickland,</p> <p>4 from Ballotpedia.</p> <p>5 So, Senator Strickland, rather than</p> <p>6 go tediously through every matter that -- or</p> <p>7 every position you've ever held, I just wanted</p> <p>8 you to look through these documents and first</p> <p>9 let us -- let me know if you recognize them and</p> <p>10 then if you believe they are to be -- are</p> <p>11 accurate.</p> <p>12 A I recognize Exhibit 272. I don't</p> <p>13 know when it was done, but it appears to be the</p> <p>14 bio I had when I was a state representative.</p> <p>15 It was accurate at the time other than I don't</p> <p>16 know if I was currently serving as president of</p> <p>17 Henry County Kiwanis Club at that time, but I</p> <p>18 was former president.</p> <p>19 And I don't know if was still a</p> <p>20 member of the First Baptist Church of Hampton,</p> <p>21 but I was formerly a member of that church.</p> <p>22 Q And is what -- I'm sorry. You said</p> <p>23 that it appears to be accurate otherwise?</p> <p>24 A Other than those two things. And I</p> <p>25 say accurate at the time. At least everything</p>	<p style="text-align: right;">33</p> <p>1 are generally -- if they are accurate.</p> <p>2 A I do not know the social media sites</p> <p>3 or campaign address, if that's correct. But</p> <p>4 the post office box they have is actually my</p> <p>5 personal post office box. The phone number,</p> <p>6 957 number, is my office number. You already</p> <p>7 know my cell phone number is correct there.</p> <p>8 My name, gender, wife, birthday,</p> <p>9 birthplace, home city, religion, education</p> <p>10 appear to be correct.</p> <p>11 Q And then the political experience</p> <p>12 page? Again, you don't have to go down each</p> <p>13 one individually if you can just tell me if</p> <p>14 it's accurate. Or pick out anything that's</p> <p>15 inaccurate, I should say.</p> <p>16 A It appears to have the committees</p> <p>17 I've served on. I was in the House. I've</p> <p>18 always practiced at the same law firm. And I</p> <p>19 was previously -- I was never a spokesperson</p> <p>20 for Piedmont Henry Hospital.</p> <p>21 But other than that, the rest of the</p> <p>22 religious, civic, and other memberships are</p> <p>23 correct, at least previously they were correct,</p> <p>24 and the award is correct.</p> <p>25 Q Okay. Thank you.</p>
<p style="text-align: right;">32</p> <p>1 else seems to be my bio.</p> <p>2 Q Right.</p> <p>3 A 275 appears to be a bio from my firm</p> <p>4 page. And if it's something that my firm</p> <p>5 published, I'm sure it's correct, but there</p> <p>6 may be the same two exceptions with when I</p> <p>7 served as president of Kiwanis and which church</p> <p>8 I belong to.</p> <p>9 And my age is not correct on this.</p> <p>10 Maybe I was 33 at the time he printed it, or</p> <p>11 maybe it hasn't been updated. I'm 34.</p> <p>12 And Exhibit 274, I don't recognize</p> <p>13 it, but it appears to be from a campaign</p> <p>14 website that I had, and it appears to be the</p> <p>15 same bio that's on 275.</p> <p>16 Q And similarly accurate with the</p> <p>17 exceptions you mentioned?</p> <p>18 A Yes. And I do not recognize 276 or</p> <p>19 273.</p> <p>20 Q Can you just look at this 273</p> <p>21 exhibit briefly.</p> <p>22 A Uh-huh (affirmative).</p> <p>23 Q And especially to the third and</p> <p>24 fourth pages of the exhibit. And if you could</p> <p>25 let me know, scanning those entries, if they</p>	<p style="text-align: right;">34</p> <p>1 A Uh-huh (affirmative).</p> <p>2 Q By the way, with your law firm are</p> <p>3 you a partner? An associate?</p> <p>4 A Yes, I'm a partner. I guess</p> <p>5 formally I'm a member. We're an LLC, so I'm a</p> <p>6 member, same as being a partner in our world.</p> <p>7 Q You were first elected to your House</p> <p>8 District 111 in 2012?</p> <p>9 A Correct.</p> <p>10 Q Was that the first time you were</p> <p>11 elected to any government office?</p> <p>12 A Yes.</p> <p>13 Q Were you ever previously appointed</p> <p>14 to any government office?</p> <p>15 A No.</p> <p>16 Q Had you previously worked for the</p> <p>17 government in any capacity?</p> <p>18 A Yes.</p> <p>19 Q And in what capacity?</p> <p>20 A When I was in high school and</p> <p>21 college, I was a State employee, and at one</p> <p>22 point a federal employee, when I worked my</p> <p>23 summers at an agricultural research</p> <p>24 institution, or the arm of the University of</p> <p>25 Georgia. It was a summer job dealing with</p>

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<p style="text-align: right;">35</p> <p>1 peanuts.</p> <p>2 Q So I assume it had nothing to do</p> <p>3 with redistricting?</p> <p>4 A Not whatsoever, unless you -- I</p> <p>5 guess peanuts. Other than nuts, that's the</p> <p>6 only thing that's relevant.</p> <p>7 Q Other than the redistricting process</p> <p>8 from 2015, have you ever participated in the</p> <p>9 redistricting process for any House -- for the</p> <p>10 House or the Senate --</p> <p>11 A No.</p> <p>12 Q -- in Georgia? Have you ever done</p> <p>13 any research of any sort in -- with regard to</p> <p>14 redistricting?</p> <p>15 A No.</p> <p>16 Q Have you ever spoken publicly or</p> <p>17 published anything about the issue of</p> <p>18 redistricting in general?</p> <p>19 A Yes.</p> <p>20 Q And what was -- can you describe</p> <p>21 what that was?</p> <p>22 A I've never published anything. The</p> <p>23 only time I recall speaking publicly about it</p> <p>24 is I was asked a question while campaigning for</p> <p>25 State Senate. And the question that I</p>	<p style="text-align: right;">37</p> <p>1 ensued.)</p> <p>2 THE VIDEOGRAPHER: We're back on the</p> <p>3 video record at 9:56 a.m.</p> <p>4 Q While we were off the record, I --</p> <p>5 we realized that I had inadvertently previously</p> <p>6 marked the exhibit which I just referred to as</p> <p>7 Exhibit 278 as Exhibit 277. So the exhibit</p> <p>8 that Representative -- excuse me, Senator</p> <p>9 Strickland is looking at now is Exhibit 277.</p> <p>10 It appears to be a report from the</p> <p>11 henryherald.com of a meeting where Nelva Lee</p> <p>12 and Brian Strickland spoke; is that correct?</p> <p>13 A Yes.</p> <p>14 Q And it's dated January 23rd, 2018?</p> <p>15 Is that on or near the date that you did speak?</p> <p>16 A No.</p> <p>17 Q When?</p> <p>18 A It's actually dated January 2nd,</p> <p>19 2018.</p> <p>20 Q Ah, I see that. Yes. And is that</p> <p>21 on or near the date that you spoke?</p> <p>22 A It should be. It was sometime -- I</p> <p>23 believe it was actually between Christmas and</p> <p>24 New Year's, if I remember correctly.</p> <p>25 Q And do you believe -- I realize it's</p>
<p style="text-align: right;">36</p> <p>1 remember, it was a political forum, was do you</p> <p>2 believe that redistricting should be done by an</p> <p>3 unelected group that's not partisan, or should</p> <p>4 it be done by elected officials.</p> <p>5 And my response was it should be</p> <p>6 done by elected officials because politics</p> <p>7 exists everywhere. But the one thing that's</p> <p>8 different about elected officials, you can vote</p> <p>9 us out if you disagree with us.</p> <p>10 And I got a good response from the</p> <p>11 crowd.</p> <p>12 Q I'm just going to mark as exhibit --</p> <p>13 can I just do it?</p> <p>14 A There. That's the forum. I see</p> <p>15 your picture.</p> <p>16 (Whereupon a document was identified as</p> <p>17 Plaintiff's Exhibit 277.)</p> <p>18 Q I'm handing you a documents that's</p> <p>19 been -- that I've marked for identification as</p> <p>20 Exhibit 278.</p> <p>21 (Whereupon off-the-record discussions</p> <p>22 ensued.)</p> <p>23 THE VIDEOGRAPHER: Going off the</p> <p>24 video record at 9:55 a.m.</p> <p>25 (Whereupon off-the-record discussions</p>	<p style="text-align: right;">38</p> <p>1 not a full record of the meeting. But is</p> <p>2 what's stated in there an accurate</p> <p>3 representation of what you said?</p> <p>4 And just for the record, I didn't</p> <p>5 mean to suggest it's everything you said. But</p> <p>6 what is included in here that indicates that</p> <p>7 you said it, is that accurate?</p> <p>8 A Well, there are two quotes I see.</p> <p>9 The first one starts with "the current system"</p> <p>10 and ends with "an election." The second one</p> <p>11 starts with "we can do it the right way" and</p> <p>12 ends with "accountable to do that." Let me</p> <p>13 read it.</p> <p>14 Yeah, exactly what I -- almost</p> <p>15 exactly what I said from memory, so, yes, that</p> <p>16 is what I said at the forum.</p> <p>17 Q Okay. Now, I did have one question</p> <p>18 about what you said. You said that there will</p> <p>19 be -- if we take away the elected person making</p> <p>20 those decisions, there will be someone else we</p> <p>21 can't hold accountable. How -- can't hold</p> <p>22 accountable every two years in an election.</p> <p>23 A Yes.</p> <p>24 Q Can you hold a representative</p> <p>25 accountable if you are removed from the</p>

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<p style="text-align: right;">39</p> <p>1 representative's district prior to the next 2 election, prior to an election? 3 A Yes. 4 Q How? 5 A Well, if you -- you can still speak 6 out against the process, and you still get to 7 vote for a representative. So, yes, you still 8 can hold them accountable. 9 Q But in such a hypothetical 10 situation, the person who is removed from your 11 district could not vote in the next election 12 with regard to you; is that correct? 13 A If they're not in my district, they 14 couldn't. That's correct. 15 Q So in that respect, they could not 16 hold you accountable? 17 A Yes, they still could. 18 Q I don't know. How is that? 19 A Well, they would still be able to 20 vote for someone in the House. And if they 21 thought that they were unfairly removed, then 22 they could obviously petition and let other 23 people know that they were unfairly removed. 24 So, yeah, they could still hold me accountable. 25 Q So in that sense, that is the sense</p>	<p style="text-align: right;">41</p> <p>1 what the term racial dilution means? 2 A No. 3 Q Do you have any background with 4 using any kind of mapping software? 5 A No. 6 MR. STRICKLAND: Got that one, yeah. 7 MR. PHILLIPS: This one, you did 8 get? 9 MR. STRICKLAND: Yeah, I did get a 10 copy of that one. That was 277, I believe. 11 MR. PHILLIPS: Yes. 12 Counsel, Mr. Khoury, did you -- did 13 I give you a copy of this? 14 MR. KHOURY: Yes. I have that one. 15 Thank you. 16 Q Where is House District 111? 17 A In Henry County, Georgia. 18 Q What were your responsibilities when 19 you represented House District 111 as a member 20 of the House? 21 A They were numerous. I mean, I 22 served as state representative for the 23 district. 24 Q And what -- when you say served as 25 state representative for the district, what</p>
<p style="text-align: right;">40</p> <p>1 you're saying that they could hold you 2 accountable if they were removed from your 3 district -- 4 A Yeah. 5 Q -- prior to the election? 6 A Yes. And the biggest thing I'm 7 saying is they get -- if you have elected 8 people doing this, in the sense of when I say 9 "doing this," drawing districts, we all have to 10 be voted on by the people. 11 Q But they couldn't hold you 12 accountable by voting one way or another about 13 you; is that correct? That is one method they 14 could not use to hold you accountable? 15 A Well, they couldn't vote for or 16 against me. 17 Q Do you have a general understanding 18 of the term racial gerrymandering? 19 A No. 20 Q Do you have a general understanding 21 of the term political gerrymandering? 22 A No. 23 Q Or partisan gerrymandering? 24 A No. 25 Q Do you have an understanding about</p>	<p style="text-align: right;">42</p> <p>1 generally do you mean by that? 2 A I was elected to serve as state 3 representative. 4 Q And what -- when you took office as 5 state representative, would you agree that you 6 had the duty to represent all the people in 7 House District 111? 8 A Yes, all the people actually in the 9 state of Georgia. 10 Q I'm sorry. Say that again. 11 A All the people in the state of 12 Georgia. 13 Q But in addition or -- not in 14 addition, but part of that representation was 15 for the district, House District 111? 16 A If they lived in the state of 17 Georgia, yes. 18 Q Do you believe you had a duty to 19 represent all the people, including those 20 people who do not vote for you? 21 A Yes. 22 Q Those who did not -- who voted 23 against you? 24 A Yes. 25 Q Did you, did you believe you had a</p>

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<p style="text-align: right;">43</p> <p>1 duty to represent the Democratic residents of</p> <p>2 your district?</p> <p>3 A Yes. They voted for me too.</p> <p>4 Q And what if they didn't vote for</p> <p>5 you?</p> <p>6 A Then I'd still represent them.</p> <p>7 Q Did you believe you had a duty to</p> <p>8 represent African-Americans --</p> <p>9 A Yes.</p> <p>10 Q -- who reside in your district?</p> <p>11 A I represent all people, no matter</p> <p>12 who they are.</p> <p>13 Q Is it correct that the Georgia House</p> <p>14 is in session for 40 days each year?</p> <p>15 A Yes.</p> <p>16 Q And is the rest of your professional</p> <p>17 time taken up with your law office work?</p> <p>18 A No.</p> <p>19 Q What is -- what do you do</p> <p>20 professionally outside the House?</p> <p>21 A I still -- it's a full-time job</p> <p>22 honestly the rest of the year, but I have</p> <p>23 another full-time job practicing law, so I</p> <p>24 balance the two the rest of the year.</p> <p>25 During the three months on average</p>	<p style="text-align: right;">45</p> <p>1 Representatives.</p> <p>2 Q And were you -- what -- were you the</p> <p>3 chairman of just one committee during that</p> <p>4 time?</p> <p>5 A Yes.</p> <p>6 Q And which committee was that?</p> <p>7 A Industry and Labor.</p> <p>8 Q And, again, I think I know the</p> <p>9 answer to the question, but did the Industry</p> <p>10 and Labor committee have anything to do with</p> <p>11 redistricting?</p> <p>12 A No.</p> <p>13 Q When you were elected -- strike</p> <p>14 that.</p> <p>15 When you participated or planned for</p> <p>16 a campaign for a seat in the House of</p> <p>17 Representatives, what type -- did you rely on</p> <p>18 demographic information of any sort to estimate</p> <p>19 your likelihood of success in the campaign?</p> <p>20 A No.</p> <p>21 Q Did you consider past voting</p> <p>22 information, for example, as to how people</p> <p>23 voted in your district?</p> <p>24 A No, because my district was a new</p> <p>25 district too. It was newly created in the</p>
<p style="text-align: right;">44</p> <p>1 we're in session, I'm somewhat full-time. And</p> <p>2 in session, I'm still practicing some law.</p> <p>3 Q Can you -- during the time that you</p> <p>4 were a member -- well, how long were you a</p> <p>5 member of the House?</p> <p>6 A I was elected in 2012, sworn in in</p> <p>7 2013, and I was there until December of 2017.</p> <p>8 Q And how many elections did you fight</p> <p>9 or participate in during that time?</p> <p>10 A Three, I believe.</p> <p>11 Q During the time that you were a</p> <p>12 member of the House, what were the names and</p> <p>13 positions of your, excuse me, legislative</p> <p>14 staff? And I -- let me exclude from that</p> <p>15 question administrative assistants.</p> <p>16 A Okay.</p> <p>17 Q So people who were not -- who were</p> <p>18 administrative assistants as opposed to staff</p> <p>19 members.</p> <p>20 A I didn't have any staff members that</p> <p>21 I'm aware of. When I was a chairman of a</p> <p>22 committee, there were probably committee staff</p> <p>23 members. I do not remember their names. But</p> <p>24 they were not working for me. They were</p> <p>25 general staff members of the House of</p>	<p style="text-align: right;">46</p> <p>1 2010, I guess it's 2010 redistricting, so there</p> <p>2 was no past data to look at.</p> <p>3 Q What about the second or third time</p> <p>4 you ran, did you consider past voting</p> <p>5 information from the first election?</p> <p>6 A No. I mean, other than the number</p> <p>7 of votes I received, whatever it was.</p> <p>8 Q And did you consider racial</p> <p>9 information in determining whether you thought</p> <p>10 you would win or lose?</p> <p>11 A No.</p> <p>12 Q So you did not -- you never</p> <p>13 considered the proportion of African-American</p> <p>14 electors -- or excuse me, voters in your</p> <p>15 district as to whether or not -- in the context</p> <p>16 of whether or not you could be successful in</p> <p>17 your election?</p> <p>18 A No, other than the fact that I knew</p> <p>19 my district being in metro Atlanta was a</p> <p>20 diverse district, especially compared to some</p> <p>21 other people's districts. And with that, I</p> <p>22 would make sure to focus on everyone, and so I</p> <p>23 campaigned in all communities. So other than</p> <p>24 that, no.</p> <p>25 Q Did you rely on the Congressional</p>

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17 (Pages 47 to 50)

<p style="text-align: right;">47</p> <p>1 Reapportionment Office when you were developing 2 a campaign strategy? 3 A No. 4 Q Did you ever look at data from your 5 district with regard to voting or racial 6 characteristics on the precinct level? 7 A No. 8 Q Did you look at data, similar data, 9 racial or any other demographic including 10 voting, past voting records on the street or 11 block level? 12 A No. 13 Q Do you canvas your voters? 14 A What do you mean by "canvas"? 15 Q Well, did you knock on any doors? 16 A Yes. 17 Q Okay. And did you do that for all 18 areas of the district? 19 A Yes. 20 Q Including the racially diverse areas 21 of your district? 22 A There's really not, honestly, 23 racially diverse areas, or wasn't. 24 Q Oh, I'm sorry. 25 A I was --</p>	<p style="text-align: right;">49</p> <p>1 Q Social media? Do you use social 2 media? 3 A Yes. 4 Q What type of social media do you 5 use? 6 A I do Facebook, Instagram, Twitter, 7 maybe others. Those are the three that I'm 8 aware of. 9 Q What type of person in your 10 district, in your understanding, and again I'm 11 referring to the House of Representatives 12 district, is more likely than not to vote for 13 you? 14 A Someone that has met me is more 15 likely to vote for me. In my experience, if 16 I'm able to reach a voter, then I have a good 17 chance that they'll vote for me. So when I 18 campaigned for the House district in 19 particular, I was personally out there all the 20 time knocking on doors, seeing everybody I 21 could see. 22 Q So you don't have any kind -- you 23 don't have any, any type of person in mind as 24 someone who is likely not to vote for you? 25 A That's likely not to vote for me?</p>
<p style="text-align: right;">48</p> <p>1 Q Go ahead, please. 2 A You wouldn't be able to take, in my 3 opinion, District 111 and say one area's 4 diverse, one area's not. But we worked the 5 entire district regardless. 6 Q So are you saying that -- and I'm 7 focusing obviously for obvious reasons on the 8 black voters in your district. 9 A Okay. 10 Q But would you say they do not live 11 in any particular prescribed areas of your 12 district as opposed to the white voters in your 13 district? 14 A That's correct. 15 Q So the entire district is racially 16 integrated? 17 A Yes. 18 Q Block by block? 19 A As far as I know, yes. 20 Q Do you mail pamphlets during 21 election campaigns? 22 A No, not pamphlet -- what do you mean 23 by "pamphlets"? 24 Q Fliers. 25 A We do mailers.</p>	<p style="text-align: right;">50</p> <p>1 Q Yes. 2 A No. 3 Q Isn't it correct that black, 4 black -- African-American voters in Georgia 5 tend to favor, substantially favor, Democratic 6 representatives? 7 A I don't know the answer to that. I 8 haven't looked at the data. Not in my 9 experience. In my experience, when I knock on 10 a door, whether they're white, black, purple, 11 green, orange, I get a very similar response. 12 Q But do you know if that similar 13 response when you knock on the door translates 14 into a favorable vote or not? 15 A I don't know how they vote. I'm not 16 there when they vote. 17 Q If you had to pick one metric other 18 than party affiliation, either whether the 19 person -- in other words, whether the person is 20 Republican or Democrat, that determine the 21 likelihood of someone who would vote for you, 22 what would you think that metric would be? 23 A Whether or not they had met me or 24 been reached by my campaign. 25 Q Do you believe that the race of a</p>

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18 (Pages 51 to 54)

<p style="text-align: right;">51</p> <p>1 voter provides an indication as to whether he</p> <p>2 or she would vote for you?</p> <p>3 A No.</p> <p>4 (Whereupon a document was identified as</p> <p>5 Plaintiff's Exhibit 44.)</p> <p>6 Q Let me ask you to look at a document</p> <p>7 which I will mark as Exhibit 278 for</p> <p>8 identification. And that's not the document.</p> <p>9 Oh, I apologize. This is actually</p> <p>10 Plaintiff's Exhibit 44. Again, I have made a</p> <p>11 mistake. It's been previously marked as</p> <p>12 Exhibit 44.</p> <p>13 A Okay.</p> <p>14 Q And if you could take a look at</p> <p>15 this, these, Senator Strickland.</p> <p>16 I should note that you are not on</p> <p>17 this string of emails, but I wanted to ask you</p> <p>18 about a few things --</p> <p>19 A Okay.</p> <p>20 Q -- contained in the emails. Do you</p> <p>21 know who Dan O'Connor is?</p> <p>22 A Yes.</p> <p>23 Q Who is he?</p> <p>24 A I don't know his title, but he works</p> <p>25 in the Reapportionment Office.</p>	<p style="text-align: right;">53</p> <p>1 expert. You're --</p> <p>2 A I just don't know. I don't consider</p> <p>3 him an expert.</p> <p>4 Q Have you heard anybody say that he</p> <p>5 is an expert?</p> <p>6 A No.</p> <p>7 Q Do you know who Ben Jordan is?</p> <p>8 A No.</p> <p>9 Q In the title of this email is -- the</p> <p>10 email chain is between Mr. O'Connor and</p> <p>11 Mr. Jordan, is that correct, as you see this?</p> <p>12 A No. I don't see a Jordan anywhere.</p> <p>13 Q Well, at the top, for example it's</p> <p>14 from Mr. O'Connor. Do you see that?</p> <p>15 A Yes.</p> <p>16 Q And then there's a Sent line, and</p> <p>17 there's a To line, and it says Ben Jordan; is</p> <p>18 that correct?</p> <p>19 A We must have different emails. This</p> <p>20 says David Knight.</p> <p>21 Q Oh, geez. I apologize. We're on</p> <p>22 the same -- different page. Let me see.</p> <p>23 I made yet another mistake in</p> <p>24 marking documents, and I apologize again.</p> <p>25 A That's okay.</p>
<p style="text-align: right;">52</p> <p>1 Q Have you ever worked with him?</p> <p>2 A No.</p> <p>3 Q Have you ever spoken with him in any</p> <p>4 way?</p> <p>5 A Yeah. His office was on the same</p> <p>6 floor as I believe my first office I had when I</p> <p>7 was elected, and I would see him going to the</p> <p>8 restroom. We had a similar schedule,</p> <p>9 apparently. Other than that, no.</p> <p>10 Q Okay. Do you know who -- do you</p> <p>11 remember using -- I think you may have</p> <p>12 mentioned this. He's part of the</p> <p>13 Reapportionment Office?</p> <p>14 A Yes. I know he works there. I</p> <p>15 don't know what his title is.</p> <p>16 Q And do you consider him an expert on</p> <p>17 issues relating to reapportionment,</p> <p>18 redistricting?</p> <p>19 A No.</p> <p>20 Q Do you consider him an expert on</p> <p>21 voting patterns in Georgia?</p> <p>22 A No. I don't know his expertise.</p> <p>23 Q You don't know?</p> <p>24 A Huh-uh (negative).</p> <p>25 Q You're not saying he's not an</p>	<p style="text-align: right;">54</p> <p>1 (Whereupon a document was identified as</p> <p>2 Plaintiff's Exhibit 278.)</p> <p>3 Q I'll try to eliminate that problem</p> <p>4 in the future. So I am marking an exhibit --</p> <p>5 we will be looking at that exhibit in a little</p> <p>6 while, but I meant to look at this one first.</p> <p>7 Showing you Exhibit 278 which I'm</p> <p>8 marking for identification.</p> <p>9 A Ben may have been someone that</p> <p>10 worked in the majority leader's office. I'm</p> <p>11 not sure. You may already know that answer,</p> <p>12 but that's who that is. I do recognize the</p> <p>13 name.</p> <p>14 Q Okay. And this is an email dated</p> <p>15 November 18th. Well, it's an email string</p> <p>16 which begins at the bottom of November 16th,</p> <p>17 2015, and then the last email is at the top,</p> <p>18 November 18th, 2015; is that correct?</p> <p>19 A It appears to be. I've never seen</p> <p>20 these emails before though.</p> <p>21 Q Okay. If you look -- do you believe</p> <p>22 that it says break -- the subject is Breakdown</p> <p>23 of Legislators by Parties/Black Percentage. Do</p> <p>24 you see that?</p> <p>25 A Yes.</p>

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19 (Pages 55 to 58)

<p style="text-align: right;">55</p> <p>1 Q Would you agree that the percentage</p> <p>2 of blacks in a district is an important metric</p> <p>3 of party affiliation?</p> <p>4 A No.</p> <p>5 Q If you look further down the -- in</p> <p>6 the second paragraph of this email at the top,</p> <p>7 the November 18th detail, paragraph, it says in</p> <p>8 the second sentence, "Basically R percentages</p> <p>9 improve for Brian Strickland and Joyce</p> <p>10 Chandler." Do you see that?</p> <p>11 A Yes.</p> <p>12 Q Is it correct that that is racial</p> <p>13 percentages improved for Brian Strickland and</p> <p>14 Joyce Chandler?</p> <p>15 A I have no idea what R stands for. I</p> <p>16 would guess people use R for political reasons</p> <p>17 sometimes, but I have no idea.</p> <p>18 Q So you think it might be Republican</p> <p>19 percentages?</p> <p>20 A I don't know what it is.</p> <p>21 Q At the bottom of the page, it shows,</p> <p>22 says that there are tables attached showing the</p> <p>23 House members elected in the regular 2014</p> <p>24 election cycle.</p> <p>25 A Where are you reading from?</p>	<p style="text-align: right;">57</p> <p>1 disagree with the generalities that you're,</p> <p>2 that you're making.</p> <p>3 Q Okay. So if you can reach a person</p> <p>4 personally, you believe you have a chance of</p> <p>5 winning their vote.</p> <p>6 A Yes.</p> <p>7 Q Is that correct? But in general, is</p> <p>8 it not the case that black voters in Georgia</p> <p>9 vote for Democratic candidates, generally</p> <p>10 speaking?</p> <p>11 A No, I don't know that data.</p> <p>12 Q Do you know the data about black</p> <p>13 voters voting for presidential candidates</p> <p>14 over -- in the country?</p> <p>15 A No.</p> <p>16 Q You don't believe that black voters</p> <p>17 in the United States vote very heavily for</p> <p>18 Democratic candidates as opposed to Republican</p> <p>19 candidates?</p> <p>20 A I have not reviewed that data.</p> <p>21 Q Mr. Strickland, I'll remind you just</p> <p>22 for the record, you realize you are under oath;</p> <p>23 is that correct?</p> <p>24 A Yes.</p> <p>25 Q As to House District 111 in</p>
<p style="text-align: right;">56</p> <p>1 Q At the bottom of the page, the first</p> <p>2 email on the page, the November 16th email.</p> <p>3 A Okay.</p> <p>4 Q And it says in the first sentence,</p> <p>5 "following up from meeting last month, attached</p> <p>6 are tables showing the House members elected in</p> <p>7 the regular 2014 election cycle, November 2014,</p> <p>8 and black percentage of each district based on</p> <p>9 voter registration data."</p> <p>10 Do you see that?</p> <p>11 A Yes.</p> <p>12 Q Do you know why anyone would break</p> <p>13 up voters in districts, House districts, by</p> <p>14 black percentage?</p> <p>15 A By what percentage?</p> <p>16 Q By black percentage, the percentage</p> <p>17 of black voters?</p> <p>18 A No.</p> <p>19 Q Mr. Strickland, are you really</p> <p>20 saying that you don't know that black voters in</p> <p>21 Georgia tend very heavily to vote for</p> <p>22 Democratic candidates?</p> <p>23 A In my experience, no matter who the</p> <p>24 person is, if I get a chance to reach them, I'm</p> <p>25 able to get votes whether white or black. So I</p>	<p style="text-align: right;">58</p> <p>1 particular, would you say that your district</p> <p>2 was -- would you characterize your district as</p> <p>3 Republican, Democratic, evenly split? Which of</p> <p>4 those would you, would you characterize your</p> <p>5 district as?</p> <p>6 A I would say evenly split because one</p> <p>7 thing I would look at is a precinct by</p> <p>8 precinct. After an election, I will look at</p> <p>9 how many votes I got versus my opponent, and</p> <p>10 then I would look at how many votes another</p> <p>11 race, I would say a benchmark race, if you</p> <p>12 will, such as a US Senate race or governor's</p> <p>13 race, presidential race, and compare the</p> <p>14 numbers.</p> <p>15 And based on that, it was -- depends</p> <p>16 on I guess which precinct you're in. It was</p> <p>17 Republicans, Democrats switching around. I'd</p> <p>18 win places where a Democrat would win statewide</p> <p>19 or the Democrat would win a presidential</p> <p>20 election too, so it was a good mix.</p> <p>21 Q So generally speaking, evenly split</p> <p>22 as opposed to leaning heavily one way or the</p> <p>23 other?</p> <p>24 A Yeah, I would say. If I had to</p> <p>25 guess, I would say evenly split. But that</p>

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20 (Pages 59 to 62)

<p style="text-align: right;">59</p> <p>1 said, I won every race I ran there by several 2 points, so I guess you might -- but I think 3 also other Republicans have lost by several 4 points, so take it for what it's worth. 5 Q Apart from party affiliation, 6 leaving aside formal party affiliation, would 7 you say your district leans more conservative 8 than liberal or vice versa? 9 A I don't know. It's hard to define 10 what conservative and liberal means, so I don't 11 know the answer to that. 12 Q Well, let's take your definition, 13 whatever that may be. Using your definition of 14 conservative or liberal, would you say your 15 district leans more conservative or liberal or 16 somewhere in between? 17 A I would say somewhere in between. 18 Q Would you agree that 19 African-American people in your district tend 20 to vote for Democrats more often than not? 21 A I don't know. 22 Q So you've never looked at that data? 23 A Huh-uh (negative). There's no way I 24 can know. 25 Q Well, there is data regarding racial</p>	<p style="text-align: right;">61</p> <p>1 into my district which means I need to reach 2 new voters, so yes. 3 Q And would you believe that the fact 4 that there were more African-Americans moving 5 into your district would mean that there was 6 more of a chance that those people would vote 7 Democratic as opposed to Republican? 8 A I wouldn't know unless I go see 9 them. 10 Q Are you aware of any 11 African-American Republican representatives in 12 the Georgia House currently? 13 A Yes. Not current -- I don't know. 14 I know there was a African-American 15 representative. I cannot remember his name. 16 There was one. 17 Q Do you know what district he 18 represented? 19 A No. It was Warner Robins, I think. 20 Q I'm sorry? 21 A I think it was Warner Robins area. 22 Representative Heath Clark defeated him in a 23 primary election several years back. 24 Q Was he -- do you know approximately 25 when this black Republican was a member of the</p>
<p style="text-align: right;">60</p> <p>1 proportions of people in your district; is that 2 correct? 3 A I don't know. I can't tell -- I 4 don't get the chance to see how someone votes. 5 Q Well, you don't, but there is -- 6 there are records about that; correct? 7 A How they voted? 8 Q Not about individuals, but about 9 general voting patterns? 10 A No, not that I'm aware of. 11 Q In Georgia as a whole -- well; 12 strike that. 13 In Atlanta, in the Atlanta 14 metropolitan area, would you agree that 15 African-Americans tend to vote more heavily for 16 Democrats -- 17 A I don't know. 18 Q -- than for Republicans? 19 A I don't know. 20 Q If you were informed that several 21 thousand African-Americans moved into your 22 district, would you believe that would have any 23 effect on your chances of reelection? 24 A Yes, but I'd say not because they're 25 African-American, but because someone moved</p>	<p style="text-align: right;">62</p> <p>1 House? 2 A When I was there, but I don't know. 3 Q When you were? 4 A Uh-huh (affirmative). 5 Q Do you believe you can -- you could 6 win an election as a Republican in a district 7 comprised of more than 50 percent 8 African-American people? 9 A Yes. 10 Q Why? 11 A Because I think I can get voted. I 12 think people are going to vote for me based on 13 who I am. So if I work hard, then I can win 14 any election. 15 Q Let me ask you about your campaigns 16 generally. Did you have particular issues that 17 you focused on in your campaigns? And if they 18 varied, please tell me. I mean election by 19 election. 20 A They didn't really vary. I pretty 21 much had the same message all the way through, 22 including my Senate campaign. But it would be 23 bills I voted on after I had been there, I 24 guess you could say. 25 But I think the number one issue</p>

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21 (Pages 63 to 66)

<p style="text-align: right;">63</p> <p>1 would be -- well, the top two issues would be 2 education and transportation, two big issues in 3 my region of the state. 4 Q When you ran campaigns, did you 5 focus at all on national politics? 6 A No. 7 Q How your election or not would 8 affect national politics? 9 A No, because it doesn't in my 10 opinion. 11 Q Of course -- I'm sorry. Go ahead, 12 please. 13 A It doesn't, no. 14 Q How about Georgia politics? Did you 15 discuss with your constituents whether, for 16 example, your election to the House of 17 Representatives would lead to an increased 18 number of Republicans and therefore more 19 control by Republicans in the state of Georgia, 20 as an example? 21 A I don't recall doing that, huh-uh 22 (negative). 23 Q So you never appealed to people as I 24 believe sometimes people do in national races 25 on the basis of your election being favorable</p>	<p style="text-align: right;">65</p> <p>1 right here? 2 MR. PHILLIPS: Yeah. That is yours, 3 yes, sir. 4 MR. STRICKLAND: Okay. Thank you. 5 Q Again, Senator, I don't -- you are 6 not on this email. This is an email -- appears 7 to be an email from Mr. O'Connor, Dan O'Connor, 8 to David Knight. David Knight. The subject is 9 Info on new 130, PDF of House District 109. Do 10 you see that -- 11 A Yes. 12 Q -- at the top? Who is 13 Representative Knight? He's referred to as 14 Representative Knight in the first line of 15 the -- 16 A He's a state representative. 17 Q Is he Republican or Democrat? 18 A Republican. 19 Q And this is discussing, at the top 20 at least, references a pdf of the new House 21 District 109, Dale Rutledge. Do you see that? 22 A Yes. 23 Q And you see that on the left-hand 24 side in the, I suppose you would call it the 25 third paragraph, there's a column which says</p>
<p style="text-align: right;">64</p> <p>1 to a control by one party or the other at a 2 higher level of government? 3 A No, not that I recall. 4 Q Do you believe you can win an 5 election in a district composed of less than 45 6 percent whites? 7 A Yes. 8 Q Why is that? 9 A I don't think race matters. Once 10 again, I think, in my experience, if I talk to 11 a voter, know who they are, I can win their 12 vote. 13 Q Now, I'm going to give you what has 14 been previously marked as Exhibit 44. 15 A Okay. 16 MR. PHILLIPS: I think we have the 17 right one this time. I think I've already 18 given you copies of that. 19 MR. KHOURY: Yeah. We have that. 20 MR. PHILLIPS: Is that correct? 21 MR. KHOURY: That's correct. 22 MR. STRICKLAND: Yeah. 23 MR. PHILLIPS: Again, I'm sorry for 24 the confusion. 25 MR. STRICKLAND: Is this another 44</p>	<p style="text-align: right;">66</p> <p>1 House 109 (Rutledge) at the top of the little 2 chart. Do you see that? 3 A Yes. 4 Q And then a couple of lines down for 5 that, it has a line House 111 (Strickland). Do 6 you see that? 7 A Yes. 8 Q And then the two following 9 comments -- or, excuse me, columns that are 10 Percentage Black Old Map, Percentage Black New 11 Map. Do you see that? 12 A That's what it says. 13 AUTOMATED MESSAGE: Enter star one 14 to cancel and continue the conference. 15 MR. PHILLIPS: Let's go off the 16 record for one minute. 17 THE VIDEOGRAPHER: Going off the 18 video record at 10:27 a.m. 19 (Whereupon off-the-record discussions 20 ensued.) 21 THE VIDEOGRAPHER: We're back on the 22 video record at 10:28 a.m. 23 Q And this says, if you could look 24 at -- I was just starting to refer to the two 25 columns after the House 111 (Strickland). The</p>

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<p style="text-align: right;">67</p> <p>1 first column is Percent Black Old Map, and the 2 second is Percent Black New Map. And this, as 3 I said before, this is dated October 8th, 2015. 4 Is it correct that this refers, the 5 Percent Black Old Map / Percent Black New Map, 6 are the maps that are being referred to, do you 7 believe, are the maps for the 2012 map of 8 districts as opposed to the new map which was 9 the map of the 2015 districts? 10 A I don't know. 11 Q You'll see under House 111 -- beside 12 House 111, it indicates that in the old map 13 there's 37.84 percent. See that? 14 A I see it says that, yeah. 15 Q Yes. And so that would mean that 16 there were 37.84 percent black 17 African-Americans; is that correct? 18 A I don't know. 19 Q Well, what else would it be, sir? 20 A I don't know. I don't know what 21 data he's looking at or what he's referring to 22 here. 23 Q So you think Mr. O'Connor is just 24 making something up here? 25 A Perhaps. I don't know. I don't</p>	<p style="text-align: right;">69</p> <p>1 Q -- compared to 2012? 2 A I'm saying, what I would have 3 looked -- what I would have looked at would 4 have been my election numbers in the next year. 5 Q Okay. Let me -- 6 A So I don't know about '15. 7 Q Let me look at the bottom of the 8 page, please, the last paragraph on the page. 9 It says, "There are few Democrats today serving 10 in the Georgia House from districts that are 11 less than 40 percent." Do you see that? 12 A Yes. 13 Q "In fact, only three Democrats 14 represent House districts that are less than 20 15 percent black (all three of them from DeKalb, 16 where lots of white liberals inside interstate 17 285)." Do you see that? 18 A Yes. 19 Q Do you have any reason to doubt the 20 statement made by Mr. O'Connor there? 21 A Yes, because I don't know the data. 22 I honestly haven't looked at it. 23 Q So that's the reason to doubt? 24 A Yes. 25 Q But you don't know data that</p>
<p style="text-align: right;">68</p> <p>1 know what he's looking at. I was not part of 2 this email, so I don't know. 3 Q Is that what people in the 4 Reapportionment Office generally do? 5 A I don't know. They might. 6 Q Make things up? 7 A They might. I don't have a lot of 8 experience with them. 9 Q Have you ever known them to make 10 things up? 11 A I have never known them to make 12 things correct either, so I don't know. 13 Q So you're not aware that as a result 14 of redistricting in 2015 that the proportion of 15 blacks -- percentage of blacks in your district 16 declined? 17 A I don't know if that's true or not. 18 I honestly have not looked at that data. And I 19 guess the -- this is in '15, so there was an 20 election in '14. You have to look at the data 21 in '16 to see if there was a difference. 22 Q Well, no, sir. That's not correct, 23 is it? As of 2015, you can look at the data 24 and determine what the decline was -- 25 A Oh, I don't know.</p>	<p style="text-align: right;">70</p> <p>1 disproves this statement; correct? 2 A I don't know data that proves it 3 either, so I do doubt it. 4 Q And then it says to the -- the 5 paragraph in the middle of the page which 6 starts with a parenthetical, "(keep in mind 7 those figures)," do you see that? 8 A Yes. 9 Q In the second percentage -- excuse 10 me, second sentence it says, "Between April 11 1st, 2010, census and this past July, Henry 12 added more than 7,000 blacks to the voter rolls 13 while white registration declined by more than 14 3,000." Do you see that? 15 A Yes. 16 Q Were you aware of that fact? 17 A No. 18 Q So you were not aware that the 19 percentage of blacks in your district declined 20 between April 2010, or approximately April 21 2010, and in the middle of 2015? 22 A No. 23 Q Were you aware of changing 24 demographics in your district at all? I 25 mean -- strike that.</p>

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23 (Pages 71 to 74)

<p style="text-align: right;">71</p> <p>1 Did demographics, racial</p> <p>2 demographics, change during the time that you</p> <p>3 were a member of the House?</p> <p>4 A In --</p> <p>5 Q In your district.</p> <p>6 A In my district? Not that I'm aware</p> <p>7 of. It seemed to me, in my experience, that</p> <p>8 things -- it was consistent. The first</p> <p>9 election versus my last election of the House</p> <p>10 seemed very consistent with the voters that I</p> <p>11 saw and seemed consistent with the numbers I</p> <p>12 was -- I saw on election night too.</p> <p>13 Q So you didn't keep track of your</p> <p>14 district as to whether or not there were</p> <p>15 changing demographics in it?</p> <p>16 A No.</p> <p>17 Q That was uninteresting to you?</p> <p>18 A Yeah. I was too busy trying to</p> <p>19 focus on doing my job and getting reelected</p> <p>20 again when I ran again.</p> <p>21 Q Are you familiar with the term</p> <p>22 majority-minority district or</p> <p>23 majority-minority, any political district?</p> <p>24 A Am I familiar with the term? No.</p> <p>25 I've heard that before, but no.</p>	<p style="text-align: right;">73</p> <p>1 A Yes. People use that who like to</p> <p>2 talk about race.</p> <p>3 Q Yes. Okay. So, again,</p> <p>4 majority-minority meaning majority -- the</p> <p>5 majority of the people in your district are</p> <p>6 members of minority groups, such as blacks,</p> <p>7 Asians, native Americans. Is that your</p> <p>8 understanding?</p> <p>9 A No.</p> <p>10 Q What is your understanding?</p> <p>11 A Of what? Of what -- the people in</p> <p>12 my district?</p> <p>13 Q No. I'm sorry. I'm just trying to</p> <p>14 define what majority-minority means.</p> <p>15 A Okay.</p> <p>16 Q And let's use my definition.</p> <p>17 A What's your definition?</p> <p>18 Q A majority of the voters in a</p> <p>19 district are made up of members of minority</p> <p>20 groups.</p> <p>21 A Racial groups?</p> <p>22 Q Yes.</p> <p>23 A Okay.</p> <p>24 Q Okay. Would you say your district</p> <p>25 is majority-minority using that definition?</p>
<p style="text-align: right;">72</p> <p>1 Q Well, let me represent to you, and</p> <p>2 your counsel's free to disagree, but my</p> <p>3 understanding of majority-minority is that</p> <p>4 minority members of the district make up the</p> <p>5 majority members -- make up the majority of the</p> <p>6 voters in the district.</p> <p>7 A They become the majority, so they're</p> <p>8 not the minority, I guess.</p> <p>9 Q Right. But you're familiar with the</p> <p>10 term minorities; correct?</p> <p>11 A Yes.</p> <p>12 MR. KHOURY: Are we -- are we --</p> <p>13 racial minorities?</p> <p>14 MR. PHILLIPS: Yes.</p> <p>15 MR. KHOURY: Or are you talking</p> <p>16 ethnicities?</p> <p>17 A Oh, racial minorities?</p> <p>18 Q Racial or ethnic.</p> <p>19 MR. KHOURY: Or. So both. I just</p> <p>20 want to make sure we're using the same thing.</p> <p>21 MR. PHILLIPS: Let's use racial.</p> <p>22 Let's use racial.</p> <p>23 MR. KHOURY: Okay.</p> <p>24 A Am I familiar with the term?</p> <p>25 Q Yes, minorities.</p>	<p style="text-align: right;">74</p> <p>1 A I don't know. I'm not looking at</p> <p>2 race every day. I don't know.</p> <p>3 Q If you look at the maps -- hang on</p> <p>4 just one second.</p> <p>5 Let's don't bother with what I just</p> <p>6 said. I'll strike that.</p> <p>7 If you can look at the second</p> <p>8 paragraph -- well, strike that.</p> <p>9 If you look at the first paragraph</p> <p>10 of -- one second. You can set that exhibit</p> <p>11 aside.</p> <p>12 A Okay.</p> <p>13 (Whereupon a document was identified as</p> <p>14 Plaintiff's Exhibit 279.)</p> <p>15 Q Show you a document that I'm going</p> <p>16 to mark for identification as Exhibit 279, if</p> <p>17 you could take a look at that. I'm not going</p> <p>18 to ask you about the whole document, but you</p> <p>19 can skim it or read it as much as you like.</p> <p>20 Have you had a chance to take a look</p> <p>21 at that, Senator?</p> <p>22 A No. You said you want me to read</p> <p>23 the whole thing? You said just to scan it.</p> <p>24 Q That's what I mean.</p> <p>25 A Okay.</p>

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24 (Pages 75 to 78)

<p style="text-align: right;">75</p> <p>1 Q When I said look at it --</p> <p>2 A Yeah, I've scanned it.</p> <p>3 Q -- it was scan through it, yes.</p> <p>4 A Uh-huh (affirmative).</p> <p>5 Q Whenever I say that, Mr. Strickland,</p> <p>6 you should feel free to read the whole document</p> <p>7 if you so -- if you prefer, but I am going to</p> <p>8 point you to sections of the document.</p> <p>9 A That's fine.</p> <p>10 Q And this appears to be an email</p> <p>11 chain beginning on page two, which is Bates</p> <p>12 number 031 at the end, with an email from</p> <p>13 Mr. O'Connor to Mr. Knight. And then it</p> <p>14 ends -- the email chain ends on the first page</p> <p>15 with an email from, also from Mr. O'Connor to</p> <p>16 Mr. Knight dated October 8th, 2015; is that --</p> <p>17 does that -- have I said that correctly?</p> <p>18 A That's what it appears to be.</p> <p>19 Q And the subject of the email is</p> <p>20 Overall View of New House District 130. Do you</p> <p>21 see that?</p> <p>22 A Yes.</p> <p>23 Q And that refers to an attachment, a</p> <p>24 House District 111.pdf. Do you see that as</p> <p>25 well?</p>	<p style="text-align: right;">77</p> <p>1 A -- I did slightly, I think -- I got</p> <p>2 slightly fewer votes than I had in 2014 and</p> <p>3 2012. I believe that's correct. So I would</p> <p>4 not say it got more -- never got more</p> <p>5 Republican.</p> <p>6 Q Then it goes on to say that they saw</p> <p>7 a slight reduction on their GOP percentages,</p> <p>8 period.</p> <p>9 And then the following sentence</p> <p>10 says, "Representative Strickland's old</p> <p>11 district," I believe he means before the</p> <p>12 redistricting in 2015, "was almost a 50-50</p> <p>13 split between Romney and Obama in 2012, his old</p> <p>14 district pretty much a microcosm of Henry as a</p> <p>15 whole. That is, his old district overall</p> <p>16 pretty representative of the demographics of</p> <p>17 all of Henry County."</p> <p>18 First of all, do you agree that your</p> <p>19 old district, that is, before the</p> <p>20 redistricting, was pretty all -- overall pretty</p> <p>21 representatives of the Democrats of Henry</p> <p>22 County as a whole -- excuse me, of the</p> <p>23 demographics of Henry County as a whole?</p> <p>24 A I'll be honest. I use that</p> <p>25 statement too because the district is a good</p>
<p style="text-align: right;">76</p> <p>1 A Yes.</p> <p>2 Q Okay. Have you seen this email</p> <p>3 chain before?</p> <p>4 A No.</p> <p>5 Q Let me ask you, looking at the first</p> <p>6 paragraph, Mr. -- about the middle of the</p> <p>7 paragraph toward the right-hand side,</p> <p>8 Mr. O'Connor states, "As I distantly recall,</p> <p>9 Representative Strickland's district (pdf</p> <p>10 attached above), got a few points more</p> <p>11 Republican.</p> <p>12 "He only narrowly won election in</p> <p>13 2012 and 2014, while the other Henry GOP</p> <p>14 representative, Andy Welch -- representatives,</p> <p>15 Andy Welch and Dale Rutledge, saw a slight</p> <p>16 reduction in their GOP percentages."</p> <p>17 Do you recall, is that correct as to</p> <p>18 you, that you got a few more points more</p> <p>19 Republican?</p> <p>20 A No.</p> <p>21 Q You don't recall that?</p> <p>22 A I did not get a few more points more</p> <p>23 Republican. I know I didn't because my</p> <p>24 election in 2016 --</p> <p>25 Q Excuse me.</p>	<p style="text-align: right;">78</p> <p>1 middle heart of Henry County where it's</p> <p>2 located. And it has --</p> <p>3 In the northern part, people, I</p> <p>4 would say, are very much, almost -- not</p> <p>5 suburban, almost more -- consider themselves</p> <p>6 Atlanta voters, if you will, more city people,</p> <p>7 a good way of putting it. And the southern</p> <p>8 part of the district is a little more rural.</p> <p>9 And so I've used that same line</p> <p>10 before. I'm not sure if it's true, but I've</p> <p>11 used the same lines. It's a great mix of</p> <p>12 people.</p> <p>13 Q Okay. And do you know whether it's</p> <p>14 correct that your district prior to</p> <p>15 redistricting in 2015 was almost a 50-50 split</p> <p>16 between Romney and Obama in 2012?</p> <p>17 A I don't remember, but I did look at</p> <p>18 those numbers. I'd always compare my</p> <p>19 performance to other races, as I said earlier.</p> <p>20 And I know I got more votes than Romney got. I</p> <p>21 think I got more votes -- yeah, I got more</p> <p>22 votes than Romney and Obama got in the</p> <p>23 election.</p> <p>24 I outperformed, if you will, the</p> <p>25 Republican national candidates is what I'm</p>

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<p style="text-align: right;">79</p> <p>1 trying to say. So I got 53 percent of the 2 vote, I believe, in 2012 when I first ran. And 3 so to say it was probably 50-50, that's 4 probably about right. I don't remember who 5 won, honestly, if it was Romney or Obama, 6 though. 7 Q Do you believe that the 50-50 split 8 between Romney and Obama, setting aside your 9 voters in terms of how you fared in the 10 election, do you believe that 50-50 split was 11 in part due to the fact that -- due to the 12 number of African-American voters in your 13 district? 14 A I don't know. 15 Q So you did not keep track of whether 16 Mr. Obama won more black votes than Mr. Romney 17 did? 18 A No. I have no idea. 19 Q He goes on to say at the bottom, 20 toward the bottom of the second paragraph, 21 there's a sentence which begins, "I suspect a 22 lot of Clayton residents." Do you see that? 23 A Yes. 24 Q First of all, is that -- is Clayton 25 another district?</p>	<p style="text-align: right;">81</p> <p>1 Do you have any reason to doubt 2 those figures? 3 A I've never looked at those figures, 4 so I don't know. 5 Q Well, do you have any information as 6 you sit here today indicating that those 7 figures are incorrect? 8 A I don't have any information on it 9 either way. 10 Q Before the passage of -- strike 11 that. 12 Do you agree with the suspicion 13 reflected on the last sentence of 14 Mr. O'Connor's suspicion that -- strike that. 15 Do you think you can win an election 16 in Clayton County? 17 A Yes. 18 Q On what basis? 19 A Because I believe that if you give 20 me a chance, I can win any election. 21 Q You can set that one aside. 22 A Okay. 23 MR. PHILLIPS: In fact, would this 24 be -- how much time do we have? 25 THE VIDEOGRAPHER: Nine minutes</p>
<p style="text-align: right;">80</p> <p>1 A It's another county. 2 Q Another county. And is it correct 3 that he goes on to say, "Clayton, of course, 4 already heavily Democratic, indeed the most 5 heavily Democratic county in the state"? Is 6 that correct? 7 A I don't know the answer to that, but 8 I do know that every representative from 9 Clayton County is a Democrat, so it probably is 10 heavily Democrat. 11 Q And then he says between -- looking 12 further up the paragraph, there's a sentence 13 which starts on the right-hand side, "Between 14 2004 and 2014." It's the fourth line down. 15 A Yes. 16 Q On the right. But he states, 17 "Between 2004 and '14, white registration 18 totals in the county," and he's referring to 19 Henry County, "stayed about the same while 20 black voter registration increased by 26,000. 21 "(Last year the roughly 120,000 22 registered voters in Henry, about 37 percent 23 were black, 49 percent white, 1 percent Asian, 24 2 percent Hispanic, and 11 percent others)," et 25 cetera.</p>	<p style="text-align: right;">82</p> <p>1 left. 2 MR. PHILLIPS: Is it okay if we take 3 a break now? Or strike that. Let's continue 4 on until the end of the tape. 5 THE WITNESS: Sounds good with me. 6 MR. PHILLIPS: If that's okay with 7 the witness. 8 THE WITNESS: That's fine. 9 (Whereupon a document was identified as 10 Plaintiff's Exhibit 280.) 11 Q Senator, I am giving you a document 12 I've marked for identification as Exhibit 280, 13 which is -- on the first page of the document, 14 it's labeled GA2-001601. It's a multipage 15 document. And it is an email or appears to be 16 an email from Mr. O'Connor addressed to a Jan 17 Jones. 18 And the subject matter is Follow-Up 19 State House Districts, and it is dated February 20 27th, 2015. See this? 21 A Yes. 22 Q Have you ever seen this email 23 before? 24 A No. 25 Q If you look at the following pages,</p>

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26 (Pages 83 to 86)

<p style="text-align: right;">83</p> <p>1 the chart, the charts that occur on the</p> <p>2 following pages, do you know in one of the --</p> <p>3 among other things, there is information for</p> <p>4 House District 111. For example, on the first</p> <p>5 chart on the second page of the exhibit,</p> <p>6 there's a couple of -- there's information</p> <p>7 about House District 111. Do you see that?</p> <p>8 A Yes, there appears to be.</p> <p>9 Q And then similarly, on the fourth</p> <p>10 page of the exhibit, there's information broken</p> <p>11 out for House District 111.</p> <p>12 A Okay.</p> <p>13 Q See that? I'm sorry. I didn't hear</p> <p>14 your answer.</p> <p>15 A Okay. I see where you're --</p> <p>16 Q You see?</p> <p>17 A Uh-huh (affirmative).</p> <p>18 Q Okay. And I apologize. I know you</p> <p>19 said you did not see the email itself, but have</p> <p>20 you seen this, the tables that are attached to</p> <p>21 the document?</p> <p>22 A No.</p> <p>23 Q Before the passage of House Bill</p> <p>24 566 -- let me back up.</p> <p>25 Is it your understanding that House</p>	<p style="text-align: right;">85</p> <p>1 A She is the -- I don't recognize her</p> <p>2 email address here, but Jan Jones is the</p> <p>3 Speaker Pro Tem of the House of</p> <p>4 Representatives.</p> <p>5 Q And he says at the beginning, "Hi,</p> <p>6 Madame Pro Tem. Following up from yesterday, I</p> <p>7 have attached data concerning the House</p> <p>8 districts of Representatives Chandler (105),</p> <p>9 Strickland (111)," et cetera. You see that?</p> <p>10 A Yes.</p> <p>11 Q And he says, "voter registration by</p> <p>12 counties for their respective districts and</p> <p>13 voting in various statewide contests for those</p> <p>14 districts from last fall." See that?</p> <p>15 A Yes.</p> <p>16 Q And do you know what the reference</p> <p>17 is to "following up from yesterday"?</p> <p>18 A No.</p> <p>19 Q Were you in a meeting by any chance</p> <p>20 or a conference call regarding data concerning</p> <p>21 the House districts of yourself as well as</p> <p>22 others?</p> <p>23 A I did have some meetings that did</p> <p>24 look at data when that bill was being</p> <p>25 considered, yes, but I do not recall any</p>
<p style="text-align: right;">84</p> <p>1 Bill 566 was the bill with regard to the</p> <p>2 redistricting that took place in 2015?</p> <p>3 A If you say that's the number, then</p> <p>4 I'll agree with you. I don't remember the</p> <p>5 number.</p> <p>6 Q Let me represent to you that it is.</p> <p>7 A Okay.</p> <p>8 MR. PHILLIPS: Is that your</p> <p>9 understanding as well, Counsel?</p> <p>10 A Okay.</p> <p>11 MR. KHOURY: Yes.</p> <p>12 Q So before the passage of House Bill</p> <p>13 566, had you asked Mr. O'Connor or anyone else</p> <p>14 for information about the number of white</p> <p>15 voters in your district?</p> <p>16 A No.</p> <p>17 Q Before the passage of House Bill</p> <p>18 566, had you asked Mr. O'Connor or anyone else</p> <p>19 for information about the number of black</p> <p>20 voters in your district?</p> <p>21 A No.</p> <p>22 Q Let me point you now to the email</p> <p>23 that's the first page of the document. And</p> <p>24 then you see from the first paragraph, it</p> <p>25 says -- well, first of all, who is Jan Jones?</p>	<p style="text-align: right;">86</p> <p>1 meetings with Mr. O'Connor or Speaker Pro Tem.</p> <p>2 Q We'll get to the meetings that you</p> <p>3 just referenced in a couple of minutes.</p> <p>4 The second paragraph begins, "Of the</p> <p>5 4 districts, only one," parenthetical, "has a</p> <p>6 white majority as pertains to voter</p> <p>7 registration. Representative Chandler's</p> <p>8 district is 47 percent white."</p> <p>9 Representatives -- well,</p> <p>10 Strickland's -- strike that.</p> <p>11 "Strickland's 48 percent and</p> <p>12 Greene's 44 percent. All four members</p> <p>13 represent districts that are at least 35</p> <p>14 percent black in voter registration." Do you</p> <p>15 see that?</p> <p>16 A Yes.</p> <p>17 Q Were you aware of this data or</p> <p>18 similar data with regard to your district?</p> <p>19 A No, I guess I wasn't. I guess I was</p> <p>20 majority-minority then; right? Majority</p> <p>21 nothing, if you look at that number, so no.</p> <p>22 Q So you don't, you don't recall</p> <p>23 asking for this information?</p> <p>24 A No.</p> <p>25 Q Do you know, do you know based on</p>

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<p style="text-align: right;">87</p> <p>1 any conversations or emails or any other</p> <p>2 communications why Mr. O'Connor was compiling</p> <p>3 this data regarding the racial makeup of voter</p> <p>4 registration?</p> <p>5 A No.</p> <p>6 Q Did you ever discuss the racial</p> <p>7 makeup of voter registration in your county</p> <p>8 with anyone?</p> <p>9 A Not that I recall, no.</p> <p>10 Q It says, the bottom last sentence of</p> <p>11 paragraph says, "Generally, once a district</p> <p>12 gets in a 30 to 35 percent black range, it</p> <p>13 becomes more of a target for Democrats." Do</p> <p>14 you see that?</p> <p>15 A Yes.</p> <p>16 Q Is that your understanding?</p> <p>17 A No.</p> <p>18 Q Do you disagree with the statement?</p> <p>19 A Yes.</p> <p>20 Q What are the bases for your</p> <p>21 disagreement?</p> <p>22 A I've never heard that before. I</p> <p>23 don't know -- I don't know who would target</p> <p>24 who, so I don't know.</p> <p>25 Q So you don't know one way or the</p>	<p style="text-align: right;">89</p> <p>1 number was, but I haven't -- I don't know what</p> <p>2 it is.</p> <p>3 THE VIDEOGRAPHER: One minute left.</p> <p>4 Q Now, this is -- okay. This is dated</p> <p>5 February 27th, 2015. At that point, the</p> <p>6 information that he would have gathered would</p> <p>7 have been for your House district as it stood</p> <p>8 prior to the passage of HB 566; correct?</p> <p>9 A I don't know.</p> <p>10 Q Well, let me represent to you that</p> <p>11 it -- that is what he's talking about here.</p> <p>12 A Okay.</p> <p>13 Q Let's just accept that for the</p> <p>14 moment --</p> <p>15 A Okay.</p> <p>16 Q -- for the sake of argument. Do you</p> <p>17 think having a district of 48 percent white,</p> <p>18 white voters, would have made the 2016 election</p> <p>19 more or less competitive?</p> <p>20 A Than?</p> <p>21 Q Than it was within -- with the</p> <p>22 redistricted map of 2015?</p> <p>23 A I don't know.</p> <p>24 MR. PHILLIPS: Let's go off the</p> <p>25 record.</p>
<p style="text-align: right;">88</p> <p>1 other if that's correct. Is that --</p> <p>2 A Correct.</p> <p>3 Q And then he says toward the -- the</p> <p>4 fourth paragraph, he says, "Three of the four</p> <p>5 districts backed Obama in 2012." And among</p> <p>6 those three districts that he referenced, he</p> <p>7 says HD 111. That's your district; correct?</p> <p>8 A Correct. Maybe that's the number.</p> <p>9 I haven't seen that, but --</p> <p>10 Q Haven't seen --</p> <p>11 A Well, I did see it at some point,</p> <p>12 but I don't remember if that's the number Obama</p> <p>13 got or not.</p> <p>14 Q It says 49.6 percent.</p> <p>15 A Okay.</p> <p>16 Q You anticipated my question. Do you</p> <p>17 know if that's correct or not?</p> <p>18 A I don't remember. I do remember</p> <p>19 though, as I said previously, I would look at</p> <p>20 other races and see how their candidates fared.</p> <p>21 And I remember in particular looking at the</p> <p>22 Obama-Romney race because it was my first</p> <p>23 election, and I wanted to see if I could</p> <p>24 outperform a national race.</p> <p>25 And so I don't remember what that</p>	<p style="text-align: right;">90</p> <p>1 THE VIDEOGRAPHER: Going off the</p> <p>2 video record at 10:55 a.m.</p> <p>3 (Proceedings in recess, 10:55 a.m. to</p> <p>4 11:06 a.m.)</p> <p>5 THE VIDEOGRAPHER: We're back on the</p> <p>6 video record. This is the beginning of media</p> <p>7 file number two. The time is 11:06 a.m.</p> <p>8 Q Senator, we were looking at this</p> <p>9 document, which is an email from Mr. O'Connor</p> <p>10 to Ms. Jones, and we had looked at the cover</p> <p>11 email. And then I wanted you to turn to the</p> <p>12 charts that we previously looked at very, very</p> <p>13 briefly.</p> <p>14 And on the first chart, which begins</p> <p>15 on the second page of the exhibit, there is a</p> <p>16 line or a -- two or three rows with regard to</p> <p>17 House District 111. Do you see that?</p> <p>18 A Yes.</p> <p>19 Q And there is, and then "Henry</p> <p>20 (part)." Do you see that?</p> <p>21 A Yes.</p> <p>22 Q Is House District 111 only part of</p> <p>23 Henry County?</p> <p>24 A Yes.</p> <p>25 Q And then there's a line for Henry</p>

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<p style="text-align: right;">91</p> <p>1 (part) and then District 11 totals. Do you see 2 that, the two rows? 3 A No, I don't. That's -- 4 Q If you look -- 5 A So the Henry (part), they're the 6 same numbers, though; right? Is that what 7 you're saying? 8 Q Yes. 9 A Okay. Yeah. 10 Q All right. And on the columns that 11 are to the right of the, of the Henry [sic] 12 District 111 County, Henry, and District 111 13 Totals, there are columns for Black Voters, 14 White Voters, Asian Voters, Hispanic Voters, 15 Native American, Other Voters, and then Total 16 Voters. Do you see that? 17 A Yes. 18 Q And then after the black dividing 19 line, those same rows consider with 20 percentage -- continue with Percentage Black, 21 Percentage White, Percentage Asian, Percentage 22 Hispanics, Percentage Native American, and 23 Percentage -- I'm not sure what is supposed to 24 represent. Other, I would assume. Do you see 25 that?</p>	<p style="text-align: right;">93</p> <p>1 Q And were you aware that the 2 percentage -- or roughly 36.7 percent? 3 A I didn't know what the percentage 4 was. 5 Q You weren't aware that the 6 percentage of black voters was less than 40 7 percent? 8 A No. 9 Q Were you aware that the percentage 10 of white voters was 48 percent or -- 11 A No. 12 Q -- something like that? 13 A No. 14 Q So this -- you said you didn't see 15 this information. This information would have 16 been of no interest to you? 17 A No. I do find it interesting, 18 looking at it now, honestly, but I -- no, it 19 didn't have any interest to me at the time. It 20 doesn't match up with -- if you take your idea 21 that white and black vote a certain way, it 22 doesn't match up to my votes. 23 So maybe I shouldn't be interested 24 in it. 25 Q Well, first of all, Mr. Strickland,</p>
<p style="text-align: right;">92</p> <p>1 A Yes. 2 Q Did you request this information? 3 A No. 4 Q Do you know why Ms. -- Mr. O'Connor 5 provided this information to Ms. Jones? 6 A No. 7 Q Were you interested or -- so strike 8 that. 9 I think you told me that you haven't 10 seen these before. Is that correct? 11 A Not that I recall. 12 Q Okay. Do you know why Mr. O'Connor 13 was preparing a chart breaking down your county 14 or your district by racial categories? 15 A No. 16 Q And then also, not just numbers, but 17 also -- and percentages. Do you see that? 18 A Yes, but I don't know why. 19 Q So did you ever look at similar data 20 to this? 21 A Not that I recall. 22 Q Were you aware that as of February 23 27th, 2015, the percentage of black voters in 24 your district was 36.7 percent? 25 A No.</p>	<p style="text-align: right;">94</p> <p>1 it's not my idea. 2 A That's what I've gathered so far, 3 but. 4 Q It's not my idea. 5 A Okay. 6 Q It's reflected in all the records 7 and all the public announcements that I've 8 seen. 9 A They probably ought to look at my 10 data then because it doesn't work in my 11 district. 12 Q Okay. Okay. Are you aware of what 13 percentage of voters voted -- black voters 14 voted for Hillary Clinton in the most recent 15 presidential election? 16 A No. 17 Q As compared to who voted for 18 Mr. Trump? 19 A No. 20 Q No idea? 21 A No idea. 22 Q You don't think that -- do you know 23 if more than 50 percent of black voters voted 24 for Mr. Obama -- or excuse me, Ms. Clinton? 25 A I don't know. I haven't seen the</p>

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<p style="text-align: right;">95</p> <p>1 numbers.</p> <p>2 Q You don't know that from any source,</p> <p>3 whether you've seen the actual numbers or not?</p> <p>4 A No.</p> <p>5 Q Do you know whether racial</p> <p>6 demographics, racial information, is available</p> <p>7 for parts of your district, block -- at the</p> <p>8 block level?</p> <p>9 A I don't know what you mean by "block</p> <p>10 level."</p> <p>11 Q Well, block of a street.</p> <p>12 A Oh, I don't know of that. I haven't</p> <p>13 seen that data.</p> <p>14 Q Do you know if party data is</p> <p>15 available for that level?</p> <p>16 A No, not that I'm aware of. They may</p> <p>17 be, but I honestly don't know.</p> <p>18 Q Do you know whether it's -- whether</p> <p>19 racial data is available for the precinct</p> <p>20 level?</p> <p>21 A I don't know.</p> <p>22 Q And do you know whether party</p> <p>23 registration data is available at the precinct</p> <p>24 level?</p> <p>25 A I don't know.</p>	<p style="text-align: right;">97</p> <p>1 they did.</p> <p>2 Q Do you know whether of the 60</p> <p>3 Democrats elected in the 2014 House of</p> <p>4 Representatives of Georgia election, of the 60</p> <p>5 Democrats elected, 48 were from majority black</p> <p>6 districts?</p> <p>7 A I don't know how many were elected,</p> <p>8 so I don't know.</p> <p>9 Q Do you have any understanding as to</p> <p>10 whether a majority of those Democrats elected</p> <p>11 in the 2014 House cycle were elected from black</p> <p>12 majority districts?</p> <p>13 A I don't know.</p> <p>14 Q Do you know whether it's correct</p> <p>15 that Republicans hold a very large advantage or</p> <p>16 majority of the seats held where the districts</p> <p>17 are less than 20 percent black in voter</p> <p>18 registration?</p> <p>19 A I don't know.</p> <p>20 Q I may have asked you this question</p> <p>21 before, and I apologize if I did. But do you</p> <p>22 have an understanding as to whether -- let me</p> <p>23 back up.</p> <p>24 I realize that you are not any</p> <p>25 longer a House member, but let's assume, if you</p>
<p style="text-align: right;">96</p> <p>1 Q Have you ever heard that racial data</p> <p>2 was used as a proxy for party data?</p> <p>3 A No.</p> <p>4 Q Would you deny that racial data was</p> <p>5 used as a proxy for party data at the precinct</p> <p>6 and block level?</p> <p>7 A I don't know what you're talking --</p> <p>8 MR. KHOURY: I'm going to object</p> <p>9 to -- I'm going to object to the form. Used by</p> <p>10 whom?</p> <p>11 A I don't know what you're talking</p> <p>12 about, so I don't --</p> <p>13 Q Used by the Republican party in</p> <p>14 Georgia?</p> <p>15 A I didn't -- I don't know. I don't</p> <p>16 speak for the Republican party of Georgia, so I</p> <p>17 can't answer your question.</p> <p>18 Q Mr. Strickland, I recognize that</p> <p>19 you're not speaking for the Republican party of</p> <p>20 Georgia. I'm asking you whether you as an</p> <p>21 individual representative or, for that matter,</p> <p>22 citizen of Georgia know whether the Republican</p> <p>23 party in Georgia used racial data as a proxy</p> <p>24 for party data.</p> <p>25 A I don't know. I don't know what</p>	<p style="text-align: right;">98</p> <p>1 don't mind, that you are still a representative</p> <p>2 from the District 111.</p> <p>3 A Okay.</p> <p>4 Q If you understood as you were</p> <p>5 preparing for the next House election that the</p> <p>6 percentage of black registered voters in your</p> <p>7 district was greater than 50 percent, would you</p> <p>8 have believed that your chances of reelection</p> <p>9 in that circumstance would have increased or</p> <p>10 decreased depending on the -- as opposed to</p> <p>11 your election of 2015 -- 2014?</p> <p>12 A I wouldn't know because I don't know</p> <p>13 what it was in 2014 or '16.</p> <p>14 Q '16 is what --</p> <p>15 A I don't know what it was in '16, so</p> <p>16 it would be irrelevant to me.</p> <p>17 Q Do you know about the -- any</p> <p>18 changing demographics in your district between</p> <p>19 2012 and the present?</p> <p>20 A I'm not aware of that, no. Now, I</p> <p>21 know you've represented it a couple of times,</p> <p>22 and I've seen that reference, but that was not</p> <p>23 my experience.</p> <p>24 Q When you say it wasn't your</p> <p>25 experience, what do you mean by that?</p>

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30. (Pages 99 to 102)

<p style="text-align: right;">99</p> <p>1 A When I ran for reelection, every</p> <p>2 time I had, you know, pretty close to similar</p> <p>3 vote totals. I guess you could say my last</p> <p>4 time I ran in '16, I think it was under 53</p> <p>5 percent for the first time. I think it was</p> <p>6 52.9, I rounded it up, I believe, if I remember</p> <p>7 correctly.</p> <p>8 And I can't remember if it had</p> <p>9 fallen below 53 percent, the votes I got</p> <p>10 before. So, of course, that could say</p> <p>11 something about the polling I had this last</p> <p>12 time, or me.</p> <p>13 But, otherwise, my experience has</p> <p>14 been the same every election. I've -- and I've</p> <p>15 knocked on the same doors a lot of times. I</p> <p>16 got to know the people, and then I got to know</p> <p>17 the neighborhoods. And I didn't notice any</p> <p>18 change in the neighborhoods I would go in. It</p> <p>19 was consistent with what I remember it being in</p> <p>20 2012.</p> <p>21 Q So you don't -- leaving aside who</p> <p>22 voted for you, do you have any understanding as</p> <p>23 to whether or not the percentage of people in</p> <p>24 your county -- percentage of black people in</p> <p>25 your county rose during the time between 2012</p>	<p style="text-align: right;">101</p> <p>1 to look at the metro Atlanta counties. It was</p> <p>2 a prediction that, that Cobb County was going</p> <p>3 to become a majority-minority county at some</p> <p>4 point.</p> <p>5 And but when I looked at that data,</p> <p>6 it showed Henry County actually had more white</p> <p>7 voters and was growing in white population, the</p> <p>8 opposite of what this says. So that's the only</p> <p>9 time I've ever looked at data. There was</p> <p>10 actually -- I didn't even look at data. I</p> <p>11 looked at a map.</p> <p>12 It was a virtual map you could click</p> <p>13 on, it was kind of neat to look at, to show</p> <p>14 what your county would look like</p> <p>15 demographically in 20 years, their predictions.</p> <p>16 Q When you referenced AJC, what were</p> <p>17 you referring to?</p> <p>18 A The Atlanta Journal-Constitution.</p> <p>19 Q Which is the newspaper here?</p> <p>20 A Yes.</p> <p>21 Q A newspaper?</p> <p>22 A Uh-huh, yes, the one for the, the</p> <p>23 big one locally, the big one in my district</p> <p>24 too.</p> <p>25 Q Do you have any understanding or</p>
<p style="text-align: right;">100</p> <p>1 and 2016?</p> <p>2 A I don't know. I've actually heard</p> <p>3 conflicting reports in what people say. I've</p> <p>4 heard some people say that we've become more</p> <p>5 diverse. I've heard some people say that we're</p> <p>6 less diverse. It depends on who you're talking</p> <p>7 to.</p> <p>8 But if I was asked my opinion, I'd</p> <p>9 say we're the same county we was -- we were in</p> <p>10 2012. We're obviously growing in some ways,</p> <p>11 and there's some new neighborhoods being built,</p> <p>12 but I don't see a difference in the people.</p> <p>13 Q Have you ever looked at -- strike</p> <p>14 that.</p> <p>15 Have you ever looked at any</p> <p>16 statistics with regard to changing demographics</p> <p>17 or not changing demographics in your district?</p> <p>18 A No, with one exception. I remember</p> <p>19 there was an article, I don't know who</p> <p>20 published it, but there was something published</p> <p>21 by the AJC during the Ossoff-Handel race that</p> <p>22 gave future predictions on demographics of</p> <p>23 counties.</p> <p>24 And I found it interesting and</p> <p>25 because I just -- I thought it was interesting</p>	<p style="text-align: right;">102</p> <p>1 view as to whether or not data in the AJC is</p> <p>2 more or less reliable than data produced by the</p> <p>3 Reapportionment Office or the -- of the state</p> <p>4 of Georgia?</p> <p>5 A Oh, I don't know. I don't know</p> <p>6 where they got their data from. Typically, the</p> <p>7 AJC is not very believable, but I'm not sure</p> <p>8 where they got this data from.</p> <p>9 Q Can I just ask why you say that</p> <p>10 about the AJC?</p> <p>11 A They're very political. Like a lot</p> <p>12 of groups, they have an agenda, so.</p> <p>13 Q Do they lean liberal or</p> <p>14 conservative, if you have a view on that?</p> <p>15 A I just think they lean towards</p> <p>16 helping the Democrat party.</p> <p>17 (Whereupon a document was identified as</p> <p>18 Plaintiff's Exhibit 281.)</p> <p>19 Q I'd like to show you a document that</p> <p>20 has been -- that I'd like, I'd like to mark as</p> <p>21 Exhibit 281.</p> <p>22 A Thank you.</p> <p>23 Q Exhibit 281 is a multipage document</p> <p>24 which -- I'm sorry, which begins with Bates</p> <p>25 number GA2-001214. It -- on the first page of</p>

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<p style="text-align: right;">103</p> <p>1 the document, there's an email --</p> <p>2 A We're looking at two different</p> <p>3 things again.</p> <p>4 MR. STRICKLAND: One moment. The</p> <p>5 reference on 281 that we have here is</p> <p>6 GA2-001168.</p> <p>7 THE WITNESS: That's right.</p> <p>8 MR. STRICKLAND: Just want to be</p> <p>9 sure we're working off the same document.</p> <p>10 MR. PHILLIPS: Yes, we are. And I</p> <p>11 apologize. May I borrow yours?</p> <p>12 MR. STRICKLAND: Sure.</p> <p>13 Q There seems to have been an issue</p> <p>14 with, I apologize, with the ordering of my</p> <p>15 exhibits by unnamed individuals, so I</p> <p>16 apologize.</p> <p>17 A You're not taking the blame</p> <p>18 yourself?</p> <p>19 Q Well, not in this instance.</p> <p>20 A Okay.</p> <p>21 Q Many times it is my fault, but this</p> <p>22 time I don't think it is.</p> <p>23 So this document is -- again, strike</p> <p>24 what I said previously about Exhibit 281.</p> <p>25 Exhibit 281 is in fact a document</p>	<p style="text-align: right;">105</p> <p>1 A In general, uh-huh (affirmative).</p> <p>2 Q If you can look at the last</p> <p>3 paragraph on the -- of the first email on the</p> <p>4 first page. Do you see that? It says, "I'll</p> <p>5 also check."</p> <p>6 A Yes.</p> <p>7 Q It says, Mr. O'Connor states,</p> <p>8 "Gwinnett," this is the second sentence of the</p> <p>9 paragraph, "Gwinnett and Henry have been</p> <p>10 changing quickly in recent years. Virtually</p> <p>11 all of the growth in these two counties these</p> <p>12 days is minority." Do you agree with that</p> <p>13 statement?</p> <p>14 A I don't know what he means by it.</p> <p>15 But assuming he means that the people that are</p> <p>16 moving to the two counties are nonwhite, I do</p> <p>17 not agree with that. I don't have an opinion</p> <p>18 necessarily. But my experience, it's</p> <p>19 multicultural people move into my county.</p> <p>20 I don't -- they may be white. They</p> <p>21 may be black. But I wouldn't say I see one</p> <p>22 more than the other.</p> <p>23 Q But do you have any data as -- which</p> <p>24 would show to you that, as opposed to your</p> <p>25 views generally speaking --</p>
<p style="text-align: right;">104</p> <p>1 which begins GA2-001168. It is also an email</p> <p>2 from Mr. O'Connor to Jan Jones dated September</p> <p>3 4th, 2015. And, Senator, is this a document</p> <p>4 you've seen before?</p> <p>5 A No.</p> <p>6 Q I will note that you're not on the</p> <p>7 sending or receiving, so.</p> <p>8 A I don't recall ever seeing this.</p> <p>9 Q Okay. Do you know -- in this,</p> <p>10 there's a subject line that says, "Re:</p> <p>11 Follow-Up, TSPLOST Vote.</p> <p>12 A Uh-huh (affirmative).</p> <p>13 Q Do you see that?</p> <p>14 A Yes.</p> <p>15 Q Do you know what the TSPLOST refers</p> <p>16 to?</p> <p>17 A I'm assuming it is the</p> <p>18 transportation SPLOST vote. Before I got in</p> <p>19 office, there was a big debate over TSPLOST. I</p> <p>20 want to say it was the year I ran. There were</p> <p>21 local counties had the authority to opt in; do</p> <p>22 a sales tax for transportation projects. It</p> <p>23 was a very controversial thing.</p> <p>24 Q So this was a tax for -- to support,</p> <p>25 as you say, transportation projects?</p>	<p style="text-align: right;">106</p> <p>1 A No.</p> <p>2 Q -- that he is incorrect --</p> <p>3 A I have no data that would verify</p> <p>4 what I said or what he said here, just my</p> <p>5 experience.</p> <p>6 Q And I think we've said before, but</p> <p>7 just to restate it, I take it you do not</p> <p>8 believe that, assuming Mr. O'Connor's correct</p> <p>9 that there was a growth in minorities in your</p> <p>10 district, that that would have threatened your</p> <p>11 chances for reelection in 2016?</p> <p>12 A No.</p> <p>13 Q Did you have any concerns in that</p> <p>14 regard?</p> <p>15 A No.</p> <p>16 Q Okay. You can set that aside.</p> <p>17 MR. STRICKLAND: May I end up with a</p> <p>18 copy of that?</p> <p>19 MR. PHILLIPS: Oh. I'm sorry.</p> <p>20 MR. STRICKLAND: Thank you, sir.</p> <p>21 (Whereupon a document was identified as</p> <p>22 Plaintiff's Exhibit 282.)</p> <p>23 Q And now we will turn to the document</p> <p>24 I was referring to earlier. I'm marking for</p> <p>25 identification as Plaintiff's Exhibit 282 a</p>

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<p style="text-align: right;">107</p> <p>1 document which appears to be an email chain, 2 plus some charts toward the end, from 3 Mr. O'Connor to Tom, excuse me, Tom Crawford 4 dated November 3rd, 2016. 5 And the subject line is RE: Voting 6 Data, State House Districts. Do you see that? 7 A Yes. 8 Q And it has attachments: Georgia 9 2008 President County and -- 2008, that is, and 10 Georgia 2012 President County. Do you see 11 that? 12 A That's what it says. 13 Q Subject line? 14 A Uh-huh (affirmative). 15 Q And you'll see that this email 16 string begins on the second page of the 17 exhibit, Bates number 1215, in an email from 18 Mr. O'Connor to Mr. Crawford. And then the 19 second email -- or excuse me, it continues with 20 a short email from Crawford to O'Connor. 21 And then finally on the first page, 22 there's the November 3rd email from 23 Mr. O'Connor to Crawford. Do you see that? 24 A I'm sorry. I was reading some of 25 it.</p>	<p style="text-align: right;">109</p> <p>1 of those districts that he enumerates? 2 A No. I don't refer to it as -- I 3 don't know what he means by "swaps." I look at 4 a map and tell you which district was, was 5 affected by the 2015 legislation. But I, I 6 disagree with the idea of swapping districts. 7 Q Leaving aside the term swaps and 8 substituting perhaps change -- how -- what term 9 would you use for that rather than swaps? 10 A Well, I just think if you're going 11 to talk about other districts, then I think you 12 need to say the 15 district, I mean, the '15 13 legislation made former House District 111 have 14 former parts of District 73, if you will, or 15 109, but there's no swapping that's done with 16 this. 17 Q So some -- could we say that some 18 areas of Mr. -- your district were placed into 19 the districts, these three districts, 73, 109, 20 and 110, and that some land or areas of those 21 districts were placed into your new district? 22 A Perhaps it was. Those -- those 23 three districts surround 111, so that would 24 make sense. 25 Q And then the -- he goes on to say in</p>
<p style="text-align: right;">108</p> <p>1 Q I was just going through the 2 sequence of emails. 3 A Okay. If it's, if it's what it 4 says, I agree with you. I've never seen this 5 email before. I was reading it -- 6 Q Okay. 7 A -- as you were talking. 8 Q Okay. Could you look at the last 9 two paragraphs of the -- of Mr. O'Connor's 10 email on the first page? Again, when I direct 11 you to a particular part of the email, feel 12 free to read as -- 13 A Okay. 14 Q -- whatever you would like to do so. 15 But those are the two paragraphs I'm going to 16 be focusing on. 17 The second to the last paragraph on 18 the page, the penultimate paragraph, states, 19 "Brian Strickland's new district involves swaps 20 with Districts 73 (John Yates), 109 (Dale 21 Rutledge), and 110 (Andy Welch)." 22 Was it your understanding that those 23 were -- that the statement there is correct, 24 that you exchanged sections of your districts 25 for sections of -- your district for sections</p>	<p style="text-align: right;">110</p> <p>1 the second sentence of that paragraph that 2 these three districts, 73, 109, and 110, remain 3 heavily Republican, though a little less so 4 than before. Would you agree with that 5 statement? 6 A I don't know. 7 Q And then, then in the last 8 paragraph, he says, this is Mr. O'Connor 9 speaking, "With regard to 111, doubtless you 10 saw the story Jim Galloway had this morning on 11 changing demographics in Henry. Not out of the 12 question, the county could be majority black in 13 voter registration by the time we would take up 14 redistricting in 2021 following the 2020 15 census." 16 First of all, in that -- first of 17 all, do you agree with that statement, or do 18 you -- strike that. 19 Do you have any reason to doubt that 20 statement that it is not out of question that 21 the -- Henry County could go majority black -- 22 A Yes. 23 Q -- in voter registration? And what 24 do you base that on? 25 A Because I haven't looked at that</p>

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<p style="text-align: right;">111</p> <p>1 data, and so I don't know what the data would 2 show. And this is obviously a projection, but 3 I have no idea. 4 Q Okay. And do you know who Jim 5 Galloway is? 6 A I know he's a reporter with the 7 Atlanta Journal-Constitution. 8 Q Do you have any recollection as to 9 whether this statement is true that the Great 10 Recession crash after 2007 probably slowed down 11 migration into the county, Henry County, 12 between 2008 and 2012? 13 A I don't know. 14 Q Would you consider your seat 15 competitive? 16 A In what way? 17 Q Between a Republican and Democratic 18 representatives -- or candidates for election 19 to the House of Representatives? 20 A Well, based on the data, if this 21 data is correct, which as far as -- what I mean 22 by that is, if you look at the national race, 23 races, or the statewide races versus how I 24 performed, then apparently people are voting 25 for a Democrat nationally but a Republican</p>	<p style="text-align: right;">113</p> <p>1 have any understanding as to why you don't win 2 70 percent of the vote as opposed to -- 3 A 70 percent of the people didn't vote 4 for me. 5 Q But do you have any understanding 6 why that is? 7 A No. 8 Q Why that was? 9 A (Shakes head negatively.) 10 Q You don't know why people didn't -- 11 do you have any understanding as to why people 12 didn't vote for you in your election races? 13 A No. I mean, I think that the 14 challenge that I have had is, because the 15 Democrat party has done well in other races, I 16 think there was an assumption they would do 17 well in the House race there too or in other 18 races there. 19 And when I have ran, I've 20 consistently had outside influence, in 21 particular from Washington DC and from the 22 state of Georgia, outside of Henry County come 23 in and work against me and try to talk about 24 things such as this, such as race. 25 And I've always risen above that and</p>
<p style="text-align: right;">112</p> <p>1 locally. 2 So I guess you could call that 3 competitive, but I think they're all 4 competitive in some ways. 5 Q Have you ever run an unopposed race 6 for a representative? 7 A No. I take that back. I never was 8 opposed in a primary, but I was always opposed 9 in the general. 10 Q But there -- it is -- is it correct 11 that -- well, strike that. 12 What was the percentage of -- by 13 what percentages, if you recall, did you win 14 election in the three elections you -- 15 A The best I can recall, I've always 16 gotten around 53 percent to 54 percent of the 17 vote. 18 Q Do you have an understanding as to 19 what makes your district -- as to why you have 20 prevailed -- or why your opponent in each 21 election has gathered, I take it, between 46, 22 47 percent of the vote? 23 A Uh-huh (affirmative). Do I know 24 why? 25 Q Yes. In other words, why -- do you</p>	<p style="text-align: right;">114</p> <p>1 haven't gotten into that and taken the bait. 2 And I've stayed very positive, and I've been 3 able to get people, no matter who they are, to 4 vote for me and not care about these racial 5 issues. 6 Q Have you had, you mentioned -- are 7 you referring, when you say people from out of 8 your district coming in, are you referring in 9 that last sentence to Democratic people, 10 representatives or senators? 11 A No. Actually, the local Democrats, 12 a lot of them have supported me. It's liberal 13 groups. And I know liberal is a tough word to 14 define, but it's groups that want to make 15 issues about race, such as this lawsuit. I 16 think this is the purpose of this suit in my 17 opinion too, to try to create issues that 18 aren't there, scare people into voting a 19 certain way. 20 Q You don't believe Republicans try to 21 scare people into voting a certain way? 22 A Certainly. Both parties do it. 23 Q Are you familiar with which 24 districts surround House District 111? 25 A I get the numbers mixed up, but I</p>

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<p style="text-align: right;">115</p> <p>1 know there was a reference I just -- you just 2 mentioned to me. Here, District 73, John 3 Yates, is now held by Karen Mathiak. In 4 District 109 is -- sits to my, well, it sits 5 I'll say to the 111 to the north and the east 6 of 111. 7 110 sits to the east and south of 8 111. 73 sits kind of to the west of 111. And 9 there's one more district that sits to the 10 south of 111. I don't remember the number, 11 though. 12 Q Let me just run some numbers by you. 13 A Okay. 14 Q And then I will show you a map -- 15 A Okay. That would help, yeah. 16 Q -- just to make sure we're on the 17 same page. But is it your understanding that 18 House Districts 73, 78, 109, 110, and 130 19 border District 111? 20 A That sounds right. There's more, 21 though, than just those. 22 Q Let's look. I believe -- 23 A I think 73 is Demetrius Douglas; 78 24 is Pam Stephenson, if my numbers are right. 25 That's Gwinnett.</p>	<p style="text-align: right;">117</p> <p>1 that correct? 2 A I did. That's Demetrius Douglas. 3 Q Okay. We blew that up because an 4 8-and-a-half-by-11 version, at least for me, is 5 totally unreadable, so. 6 A Uh-huh (affirmative). 7 Q Okay. We'll be looking at this a 8 little more later. 9 A Okay. 10 Q But I just wanted to make sure that 11 we were on board with each other in terms of 12 our understanding. 13 And then -- 14 A There's Gwinnett. 15 (Whereupon a document was identified as 16 Plaintiff's Exhibit 5.) 17 Q Okay. I'm going to show you another 18 map which has been previously marked as 19 Exhibit 5. 20 A Okay. 21 Q This is, again, a blowup of a map of 22 Henry house county -- excuse me, Henry County 23 House districts. This is, however, of 2012, as 24 of 2012. 25 A Okay.</p>
<p style="text-align: right;">116</p> <p>1 Q Sorry. These are somewhat awkward 2 to work with. 3 A There you go. 4 (Whereupon a document was identified 5 as Plaintiff's Exhibit 6.) 6 Q My understanding though, it does 7 appear on this -- oh, yes, it does. I'm 8 showing you a very large blowup of Exhibit 6, 9 previously marked as Exhibit 6, which I 10 believe -- which is headed Henry County House 11 districts as passed 2015. Do you see that? 12 A Yes. 13 Q And is this a map of the House 14 Districts for Henry County as passed in 2015? 15 A I believe it is. I don't see that 16 it looks incorrect, so I'm assuming it is. 17 Q And so your House District is? 18 A In the purple. 19 Q In the purple. I know that we ran 20 through a list of numbers, but can you just 21 confirm that what we just discussed was correct 22 as to the House Districts that border 111? 23 A 78 borders, 109 borders, 110 24 borders, 130 borders, and 73 borders. 25 Q Okay. And you'd mentioned 78; is</p>	<p style="text-align: right;">118</p> <p>1 Q Is this -- does this -- is it 2 correct that this is a map of the districts as 3 they existed as of 2012? 4 A I don't know, but what I see for 5 111, based on memory, appears to be correct. 6 So if that's what this has been previously 7 established as, I wouldn't doubt it. 8 Q You recall that we discussed which 9 districts bordered House District 111 as of 10 2015, correct, just a minute ago? 11 A Yes. 12 Q And we agreed, I believe, that House 13 Districts 73, 78, 109, 110, and 130 bordered 14 House District 111 as of 2015; is that correct? 15 A And 110 as well. 16 Q And 110. Did I miss that? Sorry. 17 A Uh-huh (affirmative). 18 Q And then on this map, does it show 19 that an additional district borders House 20 District 111 as of 2012? District 90, 090? 21 A And 76. 22 Q 76 also borders it? 23 A Yes. 24 Q That is different from what happened 25 in -- or what appeared in 2015 after the</p>

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<p style="text-align: right;">119</p> <p>1 redistricting went into effect; is that 2 correct? 3 A Correct. 4 Q Okay. All right. We will be 5 looking at this later to some extent, but I 6 just wanted to make sure the geography was 7 agreed upon. 8 Okay. It's correct -- is it correct 9 that you ran against a Democratic candidate 10 named Bill Blackman in 2012? 11 A Yes. 12 Q What were the most important issues 13 in that, in that campaign? Or put another way, 14 what were the main differences between you and 15 Mr. Blackman in that campaign? 16 A I think I outworked him. I don't 17 think he worked hard enough. I don't think -- 18 what I mean by that is I knocked on doors. I 19 was an unknown candidate at that time. I had 20 no record to run on. I was a young guy too. 21 And I knocked on every door I could, 22 and I don't think he did that. 23 Q Were there political or 24 philosophical differences between you and 25 Mr. Blackman?</p>	<p style="text-align: right;">121</p> <p>1 about myself. I had nothing against 2 Mr. Blackman. Still don't. He ran again for 3 something couple of years ago, and I spent some 4 time with him waving signs on the side of the 5 road. Nice guy. 6 I'm not saying -- I never talked 7 about him at all. I'm not saying he wouldn't 8 do a good job too. 9 Q Did you have an understanding -- 10 strike that. 11 I believe you said, but correct me 12 if I'm wrong, that -- well, is it correct that 13 you won around 53 percent of the vote -- 14 A That sounds right. 15 Q -- in 2012? 16 A That sounds right. 17 Q Did you expect to win -- was that 18 margin of -- for your election bigger than you 19 expected, smaller than you expected, about what 20 you expected? 21 A I don't know. I do remember, 22 though, the only thing we had to look at in 23 2012 would be how Governor Deal performed 24 against Roy Barnes, the governor's race in 25 2010.</p>
<p style="text-align: right;">120</p> <p>1 A We never had any debate. I never -- 2 I met him one time. And actually, I introduced 3 him. He came -- I was president of my Kiwanis 4 club, and he came to speak, and they had 5 invited both of us. And instead of me 6 speaking, I just gave an introduction to him 7 and gave him the floor. 8 I don't recall there being a big 9 difference between what we were running on, 10 though, honestly. 11 Q Were there -- what issues did you 12 emphasize in your campaign as to why people 13 should vote for you? 14 A That I would go to Atlanta and I 15 would work hard to be a voice for the south 16 metro, the metro region that's been overlooked 17 for years in so many different ways at the 18 state level. 19 And that was the overall premise of 20 my campaign is, who do you want to send to 21 Atlanta, me or the other guy? 22 Q And what points did you make as to 23 why you should be sent as opposed to 24 Mr. Blackman? 25 A I didn't talk about him. I talked</p>	<p style="text-align: right;">122</p> <p>1 And I know that I -- I recall 2 looking at different precincts. And I had 3 split precincts with, with district at all 4 times with both maps we had. So it wasn't a 5 perfect model to look at because you would look 6 at a precinct as a whole versus a split. 7 But if you just looked at precincts 8 as a whole, I remember Governor Deal getting 9 around 55 percent in Henry County, I believe, 10 with those -- maybe, well, not Henry County, 11 but in those districts -- in those precincts. 12 And so I expected that if you look 13 at the Republican-Democrat breakdown, because I 14 remember that being a very partisan race, that 15 if you just took any Republican and any 16 Democrat, you might could argue the Republican 17 would get around 55 percent if everybody that 18 voted Republican then voted again Republican. 19 So I thought that that told me that 20 if I had got the same votes that Deal got, I 21 would get around that amount. But I had no 22 idea what to expect because people tend to vote 23 for the candidate over the party a lot times, 24 especially in races like this. 25 Q When you say, "races like this,"</p>

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<p style="text-align: right;">123</p> <p>1 what do you mean?</p> <p>2 A A race that's not a macro race where</p> <p>3 all they see is the ads on TV, where they know</p> <p>4 the people and the people are going to their</p> <p>5 doorsteps.</p> <p>6 Q Is it also correct that local races</p> <p>7 may focus more on local issues than statewide</p> <p>8 or countrywide races in your view?</p> <p>9 A Yes and no. You're still -- you</p> <p>10 have to address national issues because people</p> <p>11 ask those questions.</p> <p>12 Q After the 2012 election, did you</p> <p>13 believe that redrawing your -- the lines, your</p> <p>14 district lines, would improve your chances of</p> <p>15 winning the next election?</p> <p>16 A No.</p> <p>17 Q Did you speak to anyone between 2012</p> <p>18 and 2014 about the possibility of changing --</p> <p>19 of redrawing House District 111?</p> <p>20 A Yes.</p> <p>21 Q Who did you speak to in that regard?</p> <p>22 A I don't remember. This is what I</p> <p>23 recall, though. At some point, I'm assuming in</p> <p>24 2014 if the legislation was in '15, the issue</p> <p>25 was brought up in the House. What I mean by</p>	<p style="text-align: right;">125</p> <p>1 said in 2014?</p> <p>2 A I'm assuming it was then.</p> <p>3 Q Was that Representative Nix?</p> <p>4 A No. I don't recall -- I don't -- I</p> <p>5 don't know if he was chairman of that</p> <p>6 committee. I guess he probably was chairman of</p> <p>7 that committee in '14, but I don't recall. I</p> <p>8 really don't remember if it was him or not.</p> <p>9 Q Did you speak with Representative</p> <p>10 Nix about the possibility of changing your</p> <p>11 district between 2012 and 2015?</p> <p>12 A I don't remember a direct</p> <p>13 conversation with him, but it was an open</p> <p>14 conversation amongst all of the legislators and</p> <p>15 from both parties, so I may have discussed it</p> <p>16 with him along the way.</p> <p>17 I'm assuming I had to at least say</p> <p>18 something to him if he carrying the bill. If</p> <p>19 he carried the bill, which I think he may have,</p> <p>20 he was chair of that committee, then I probably</p> <p>21 would have had to have spoken with him at some</p> <p>22 point, but maybe not. Maybe, maybe he took a</p> <p>23 map that was already drawn. I don't know.</p> <p>24 Q But you don't recall any specific</p> <p>25 conversations with him?</p>
<p style="text-align: right;">124</p> <p>1 that is someone in the House of Representatives</p> <p>2 said that we're going to have a bill that's</p> <p>3 going to be dealing with midterm, if you will,</p> <p>4 changes to the maps.</p> <p>5 What I mean by "midterm" is my</p> <p>6 understanding I had is, is the maps maybe</p> <p>7 visited after a census is put out, but that</p> <p>8 there -- it was traditional to also -- this is</p> <p>9 what I remember hearing. Again, I'm not sure</p> <p>10 who told me.</p> <p>11 But it was also traditional to have</p> <p>12 another look at revisiting or revising maps in</p> <p>13 small ways in a midterm, if you will, in a '15</p> <p>14 year.</p> <p>15 And I remember that being something</p> <p>16 that both parties expressed interest in, which</p> <p>17 is what we saw in '15 where both parties,</p> <p>18 Republicans, Democrats, got together and did</p> <p>19 tweaks to a map. Tweaks is the word I'm using</p> <p>20 because it was small changes.</p> <p>21 So I remember that coming up in '14,</p> <p>22 and so I knew I'd have an opportunity to look</p> <p>23 at changes in 111 at that point.</p> <p>24 Q Was the person who spoke about</p> <p>25 redistricting, I believe you -- I believe you</p>	<p style="text-align: right;">126</p> <p>1 A I don't remember any direct</p> <p>2 conversations with him, no.</p> <p>3 Q Do you recall any conversations with</p> <p>4 anyone else between 2012 -- or from after the</p> <p>5 2012 election about redrawing the lines of your</p> <p>6 district?</p> <p>7 A I recall meeting with Ms. Gina</p> <p>8 Wright in the Reapportionment Office and</p> <p>9 looking at maps such as that and also looking</p> <p>10 at how other Republicans performed in my</p> <p>11 district.</p> <p>12 I don't remember ever seeing some of</p> <p>13 that numbers -- those numbers before, but I</p> <p>14 remember also seeing how, not just the governor</p> <p>15 or the president, presidential candidates,</p> <p>16 would fair, but also looking at how Senate,</p> <p>17 Senate candidates, say at the state level as</p> <p>18 well, the national level, statewide race,</p> <p>19 fared in the district as well.</p> <p>20 Q So meeting with Ms. Wright, she's in</p> <p>21 the Reapportionment Office; is that correct?</p> <p>22 A That's correct.</p> <p>23 Q Did you reach out to her or to the</p> <p>24 Reapportionment Office to discuss the issue of</p> <p>25 redistricting?</p>

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<p style="text-align: right;">127</p> <p>1 A I don't remember who talked first.</p> <p>2 I'm telling you, it was a general, known, open</p> <p>3 discussion in the House. There was nothing</p> <p>4 private about any of it. It was both parties</p> <p>5 were looking at maps in general.</p> <p>6 So my understanding was, if you</p> <p>7 wanted to look at any changes in your district,</p> <p>8 then you would go visit with her, no matter who</p> <p>9 you are.</p> <p>10 Q And you did that; is that correct?</p> <p>11 A I did.</p> <p>12 Q And when you visited with her, and</p> <p>13 we'll go into that meeting in a little more</p> <p>14 detail later, but do you recall, were you the</p> <p>15 only one present at that meeting? Or strike</p> <p>16 that.</p> <p>17 Was District 111 the only subject of</p> <p>18 that particular meeting?</p> <p>19 A No. Well --</p> <p>20 Q Well, let me strike that.</p> <p>21 A Yeah.</p> <p>22 Q Were you the only person who met</p> <p>23 with Ms. Wright during that meeting?</p> <p>24 A If I had any one-on-one meetings</p> <p>25 with her, I don't remember that. But I do</p>	<p style="text-align: right;">129</p> <p>1 Q Do you remember the reason why, what</p> <p>2 personal reason she had?</p> <p>3 A It wasn't her. It was</p> <p>4 Representative Rutledge.</p> <p>5 Q I'm sorry. Excuse me.</p> <p>6 A He was looking at moving into</p> <p>7 downtown McDonough, and I was also looking at</p> <p>8 moving into downtown McDonough. And he had</p> <p>9 already picked out a street he wanted to live</p> <p>10 on.</p> <p>11 And my -- my view of, of any</p> <p>12 revisions to 111, then -- they need to make</p> <p>13 more sense than having a line that goes all the</p> <p>14 way north into a little bit of Stockbridge, a</p> <p>15 line that goes into Hampton for a touch, a line</p> <p>16 that goes into McDonough, and a line that goes</p> <p>17 into Locust Grove.</p> <p>18 Our county has four cities in Henry</p> <p>19 County, and every city is unique in different</p> <p>20 ways. But it didn't seem right that every city</p> <p>21 had to go to different representatives. And no</p> <p>22 one really seemed to have particular regions as</p> <p>23 a whole, and 111 was all over the place.</p> <p>24 And so I remember discussing with</p> <p>25 him and with Ms. Wright the idea of having all</p>
<p style="text-align: right;">128</p> <p>1 remember, and I'll tell you why in a minute, I</p> <p>2 guess I could say this now, John Yates was -- I</p> <p>3 remember him being present for one of the</p> <p>4 meetings because he fell asleep during the</p> <p>5 meeting.</p> <p>6 And he's an older gentleman who just</p> <p>7 passed away a month ago, served in District 73,</p> <p>8 I think it was. And so I remember there were</p> <p>9 other representatives present because I</p> <p>10 remember laughing at him falling asleep.</p> <p>11 Q There were other representatives in</p> <p>12 your meeting with Ms. Wright?</p> <p>13 A I remember him, so I'm assuming,</p> <p>14 yes.</p> <p>15 Q And did you just have one meeting</p> <p>16 with Ms. Wright in terms of the -- when you</p> <p>17 were talking about redistricting?</p> <p>18 A I don't remember. I would assume</p> <p>19 it's more than one because I would -- I</p> <p>20 remember in particular Representative Rutledge</p> <p>21 wanting to have a particular part of McDonough</p> <p>22 for personal reasons. And I remember us</p> <p>23 discussing that more than once with her and</p> <p>24 looking at some of the streets in downtown</p> <p>25 McDonough.</p>	<p style="text-align: right;">130</p> <p>1 of McDonough in 111 and not having these other</p> <p>2 two districts come into it. And that sparked a</p> <p>3 conversation with him about wanting to move</p> <p>4 into downtown McDonough at some point.</p> <p>5 And I had similar interests and --</p> <p>6 but I had not had any idea where I wanted to</p> <p>7 move or if I was going to move. I had just</p> <p>8 gotten married. That's why I was thinking</p> <p>9 about it. And -- but he already had a street</p> <p>10 picked out, and it turns out he just recently</p> <p>11 moved there.</p> <p>12 Q Do you recall what district was</p> <p>13 redistricted in part, not your district, but</p> <p>14 another district that was redistricted, in</p> <p>15 order to accommodate a farm that the district</p> <p>16 representative had purchased --</p> <p>17 A There was an email --</p> <p>18 Q -- as a residence?</p> <p>19 A -- that referenced a district, and</p> <p>20 it talked about switching small swap of land in</p> <p>21 Hall County. That may be what you're talking</p> <p>22 about. I don't remember what that was, but</p> <p>23 I -- the fact it's a small part of land. I</p> <p>24 remember some discussion about a farm, so</p> <p>25 that -- maybe that's the one you're talking</p>

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<p style="text-align: right;">131</p> <p>1 about.</p> <p>2 Q When you discussed redistricting</p> <p>3 issues with Ms. Wright and, as I think you</p> <p>4 said, you were not certain whether you met with</p> <p>5 her more than once, you thought you did --</p> <p>6 A I thought probably did. I probably</p> <p>7 did.</p> <p>8 Q -- did you take notes of those</p> <p>9 discussions?</p> <p>10 A No, not that I recall.</p> <p>11 Q Do you recall if there was any other</p> <p>12 documentation of the discussions other than</p> <p>13 notes?</p> <p>14 A No, not that I recall.</p> <p>15 Q Were there maps handed out at those</p> <p>16 meetings?</p> <p>17 A I don't believe so.</p> <p>18 Q And was there any PowerPoint used</p> <p>19 during those meetings?</p> <p>20 A No, but I do remember looking at</p> <p>21 numbers on a computer. So you say PowerPoint.</p> <p>22 I don't know if, if that was a Power -- I don't</p> <p>23 think it was a PowerPoint. It wasn't anything</p> <p>24 prepared.</p> <p>25 Q But nothing was handed out --</p>	<p style="text-align: right;">133</p> <p>1 And that's, locally, you get that</p> <p>2 from the cities, and they -- they care who</p> <p>3 their representative is which, again, creates</p> <p>4 the issue when you have three people -- folks</p> <p>5 to deal with.</p> <p>6 And I remember, I wished there was</p> <p>7 in a scenario where 111 could have all of</p> <p>8 McDonough and all of Hampton from a personal</p> <p>9 level. But it -- that would not be what I</p> <p>10 would have done if I was just in charge because</p> <p>11 that would be just for me because you have</p> <p>12 District -- is it 73 that's below in Spalding</p> <p>13 County?</p> <p>14 Q I believe so.</p> <p>15 A Whatever that district is that goes</p> <p>16 north that John Yates had, it made more sense,</p> <p>17 as we did in the redistricting, to give more</p> <p>18 interest in Henry County to that seat because</p> <p>19 that seat has had a little bit of Hampton.</p> <p>20 And even as of last year, I would</p> <p>21 still be considered the representative for</p> <p>22 Hampton because they had someone from a</p> <p>23 different county representing them. And so it</p> <p>24 made more sense to give more of that district</p> <p>25 to Spalding, the Spalding County person have</p>
<p style="text-align: right;">132</p> <p>1 A No.</p> <p>2 Q -- in that regard?</p> <p>3 A Not that I recall.</p> <p>4 Q If you, to use a Dr. Seuss</p> <p>5 comparison, ran the zoo, that is, had the</p> <p>6 control of the redistricting that was being</p> <p>7 done, how would you have drawn -- redrawn your</p> <p>8 district's boundaries in the 2014 period?</p> <p>9 A 111?</p> <p>10 Q Yes. I'm sorry. What change -- in</p> <p>11 other words, what changes would you have wanted</p> <p>12 to make?</p> <p>13 A I probably would have given 111 all</p> <p>14 of the city of McDonough. One thing I didn't</p> <p>15 like about the '15 legislation was that in</p> <p>16 doing that, though, 111 came out of the city of</p> <p>17 Hampton.</p> <p>18 While my argument made sense still</p> <p>19 that it shouldn't be touching little parts of</p> <p>20 every city, I had personal -- just I grew up in</p> <p>21 the Hampton area, and so I had personal</p> <p>22 relationships with all those councilmembers.</p> <p>23 And to this day, they still give me grief about</p> <p>24 the fact that I was no longer their</p> <p>25 representative.</p>	<p style="text-align: right;">134</p> <p>1 all of Hampton, if you will.</p> <p>2 Q Other than wanting to have all of</p> <p>3 McDonough in 111 -- is that correct?</p> <p>4 A Yes. That's my personal -- that was</p> <p>5 my personal preference.</p> <p>6 Q Right.</p> <p>7 A If I get to choose.</p> <p>8 Q Were there -- sorry. Were there any</p> <p>9 other change that you would have liked to have</p> <p>10 seen made?</p> <p>11 A No, not that I can think of.</p> <p>12 Q And I recall, I believe you stated</p> <p>13 that you had not met with Representative Nix.</p> <p>14 At least, you don't recall --</p> <p>15 A I don't recall ever meeting with</p> <p>16 him. If he says we did, maybe we did. I don't</p> <p>17 remember that at all though.</p> <p>18 Q Did you -- do you recall that --</p> <p>19 hearing that Mr. Nix, or Representative Nix,</p> <p>20 had decided that any changes that would be made</p> <p>21 or the people wanted to make between 2012 --</p> <p>22 after 2012 would be made in 2015 but not in</p> <p>23 2013 or 2014?</p> <p>24 A No, I don't recall that.</p> <p>25 Q Do you recall wanting to change your</p>

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<p style="text-align: right;">135</p> <p>1 district or redraw the lines of your district 2 prior to 2015? 3 A No. And I'll be honest with you. I 4 never -- I never wanted to redraw any lines, 5 but I was told that the issue would be visited 6 in the midterm and everybody would have a 7 chance to look at maps. 8 The only rule I was given is you 9 need to have the consent of other districts if 10 you have proposed changes to yours. And so 11 everyone need to agree on it, and that would be 12 why Mr. Yates, for example, was in a meeting 13 with me. I don't know if he ever had any 14 interest, but it affected him. 15 And the other thing that was 16 important, I don't know if it was ever stated, 17 but it was obviously how it worked too, is this 18 was -- because it's a midterm, both parties 19 consented to it. It was completely 20 bipartisan, and both parties got to make 21 tweaks. 22 And you mentioned a vote in the 23 Senate. My recollection of that is there was 24 some dispute about whether two representatives 25 actually agreed to what was done after they'd</p>	<p style="text-align: right;">137</p> <p>1 Q Who is he? 2 A He's the chief of staff for the 3 Speaker of the House. 4 Q Did you ever speak to Mr. Amburn 5 about redistricting? 6 A I don't remember, but he is the 7 spokesperson for the Speaker dealing with us as 8 representatives, so I probably at some point 9 discussed the issue with him. That may be 10 where that instruction came of getting consent 11 if there was any changes. But that may have 12 also been him speaking to all of us as a whole. 13 I don't know. 14 Q Did you ever speak to the Speaker 15 himself about this? 16 A I don't recall doing that. 17 Q Okay. Did you ever inquire as to 18 the reasoning behind the decision to make any 19 changes to the district maps in 2015 rather 20 than in 2013 or '14? 21 A The reason I understood is that's 22 how it works, is that you -- every ten years 23 there's an overhaul, if you will, and the maps 24 are completely redrawn base on census. And 25 every five years there are these tweaks where</p>
<p style="text-align: right;">136</p> <p>1 already voted on it. And they had a fight in 2 the Senate of whether or not they had agreed to 3 a swap, use that word swap, I want to say in 4 Fulton County, and that was the fight in the 5 Senate. 6 There was never any dispute -- or it 7 was completely bipartisan. Every other person 8 on that map you see supported what we did. 9 Q Turn for one minute to the Speaker's 10 office, Speaker of the House of 11 Representatives. Do you recall any involvement 12 of the Speaker's office in terms of what 13 changes should be made to the counties or the 14 districts? 15 A I think that was actually where that 16 instruction may have came -- come from. And if 17 there's going to be any changes, you need to 18 make sure everyone agrees. I -- and I may be 19 wrong, but I believe that's where that would 20 have come from. I don't remember any other 21 instructions in the Speaker's office. 22 Q Did you ever speak with Spiro -- 23 well, strike that. 24 Do you know who Spiro Amburn is? 25 A Yes.</p>	<p style="text-align: right;">138</p> <p>1 you can make small changes to correct basically 2 issues from the last census. 3 Q And where did that -- where did that 4 understanding with regard to the redrawing 5 every five years after the -- 6 A Yeah. 7 Q -- redrawing as a result of the 8 census occur? 9 A It was general knowledge of being in 10 the House. Who said it, I don't know. But it 11 was something everyone understood. 12 Q Did you have any meetings about that 13 in particular, that decision in particular? 14 A Not that I recall. 15 Q So the 2012 election map, was it 16 your understanding that that 2012 election map 17 was drawn as a result of the 2010 census? 18 A That's my understanding. I was not 19 there, but that's my understanding. 20 Q Is it your understanding that the 21 2012 redrawing of districts was precleared by 22 the Justice Department? 23 A I don't know. 24 Q You weren't in the House at that 25 time; correct?</p>

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<p style="text-align: right;">139</p> <p>1 A Yeah. I'm not sure how that works.</p> <p>2 Q Was it your understanding, generally</p> <p>3 speaking, that prior to 2012 or as of 2012 any</p> <p>4 changes in the voting maps for the state of</p> <p>5 Georgia had to be precleared by the Department</p> <p>6 of Justice of the United States?</p> <p>7 A I don't know. I'm not -- I mean,</p> <p>8 I'm a lawyer, but I don't know that much about</p> <p>9 federal law.</p> <p>10 Q Are you aware that at some point</p> <p>11 after 2012 that no longer seemed to be the --</p> <p>12 that no longer was the case, that is, that</p> <p>13 redistricting maps or voting maps could be done</p> <p>14 or prepared without the consent or -- excuse</p> <p>15 me, the clearance of the Justice Department?</p> <p>16 A I don't know.</p> <p>17 Q Have you ever had any conversations</p> <p>18 about the issue of preclearance by the Justice</p> <p>19 Department?</p> <p>20 A Not that I recall, huh-uh.</p> <p>21 Q I'm sorry, Senator. When did you</p> <p>22 first become a member of the House of</p> <p>23 Representatives, if you could you refresh my</p> <p>24 recollection?</p> <p>25 A I started in January of 2013.</p>	<p style="text-align: right;">141</p> <p>1 Q And is that what you understood the</p> <p>2 map of 2012 did?</p> <p>3 A Yes, and that's just my personal</p> <p>4 opinion.</p> <p>5 Q At any point, did you have any</p> <p>6 concern that the 2012 map of District 111 was</p> <p>7 unfair to any racial or ethnic minority group?</p> <p>8 A No, I didn't think it was unfair.</p> <p>9 Q Did you have any concern that the</p> <p>10 2012 map of House District 111 unduly split</p> <p>11 voting precincts or counties?</p> <p>12 A Not precincts or counties, but</p> <p>13 potentially you could argue that the</p> <p>14 communities, as I've said, were kind of unduly</p> <p>15 split.</p> <p>16 Q When you say "communities," are</p> <p>17 those communities -- were those split</p> <p>18 communities that you were referencing?</p> <p>19 A Uh-huh (affirmative).</p> <p>20 Q Did they also, the fact that they</p> <p>21 were split communities, did they also split at</p> <p>22 least in some cases precincts?</p> <p>23 A Yes.</p> <p>24 Q Did you have any view as to whether</p> <p>25 or not it was better or worse to split</p>
<p style="text-align: right;">140</p> <p>1 Q You're aware -- well, strike that.</p> <p>2 Looking at the -- taking the 2012</p> <p>3 map, that map of the districts, and in</p> <p>4 particular 2000 -- your district, 2011 --</p> <p>5 strike that. 1, 1 --</p> <p>6 A 111.</p> <p>7 Q 111. Sorry. Did you have any</p> <p>8 point -- at any point, did you have any concern</p> <p>9 that the 2012 map of House District 111</p> <p>10 violated any federal or state law?</p> <p>11 A No.</p> <p>12 Q Did you have any concern at any</p> <p>13 point that the 2012 map of House District 111</p> <p>14 contained any technical mistakes or errors in</p> <p>15 terms of the description of your district?</p> <p>16 A The only concern I had about 111 was</p> <p>17 it honestly didn't make a lot of sense how the</p> <p>18 district was shaped. And what I -- not the</p> <p>19 shape in itself, but the communities it was</p> <p>20 picking up.</p> <p>21 And so I don't think that's a</p> <p>22 technical, legal -- I'm not sure of the law on</p> <p>23 it, but it -- it didn't make a lot of sense in</p> <p>24 my opinion to have a representative have one</p> <p>25 little portion of each city.</p>	<p style="text-align: right;">142</p> <p>1 precincts?</p> <p>2 A I don't think it matters on -- I</p> <p>3 think what's more important is the community</p> <p>4 itself. So sometimes that means a precinct may</p> <p>5 be split with a district. I think, I think my</p> <p>6 Senate district may have some split -- I don't</p> <p>7 know if it does or not.</p> <p>8 But I don't -- I think it's more</p> <p>9 about the communities. When I say</p> <p>10 "communities," I'm really referring to the four</p> <p>11 cities of Henry County too.</p> <p>12 Q And perhaps your comments may bear</p> <p>13 on this question, but did you at any point have</p> <p>14 any concern that the 2012 map of your</p> <p>15 District 111 didn't sufficiently keep together</p> <p>16 communities of interest?</p> <p>17 A Yes.</p> <p>18 Q And could you expand on that a bit?</p> <p>19 A Yeah. This, again, goes back to the</p> <p>20 cities. If you look at that map, you'll see in</p> <p>21 particular the northern part that cuts up. And</p> <p>22 you only can know this if you're from the area</p> <p>23 or if you knock on doors. The interests are</p> <p>24 different city by city. A lot of what we do at</p> <p>25 the state level is dealing with local charters.</p>

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<p style="text-align: right;">143</p> <p>1 And one area in particular that you</p> <p>2 look at that map, the Eagle's Landing community</p> <p>3 was split. And while they have -- a lot of</p> <p>4 them have Stockbridge addresses, they were into</p> <p>5 District 109 instead of 111. You know, 111</p> <p>6 went up into Stockbridge, and so there was a</p> <p>7 big split especially in that area.</p> <p>8 And you could also argue Hampton, as</p> <p>9 I said earlier, was split because you had a</p> <p>10 representative from another county that had a</p> <p>11 little part of Hampton and then 111 had a big</p> <p>12 part of Hampton as well.</p> <p>13 And then McDonough, the square area</p> <p>14 had three different representatives</p> <p>15 representing the heart of the city.</p> <p>16 MR. PHILLIPS: Can we go off the</p> <p>17 record for a moment?</p> <p>18 MR. KHOURY: Yes.</p> <p>19 THE VIDEOGRAPHER: Going off the</p> <p>20 video record at 12:08 p.m.</p> <p>21 (Proceedings in recess, 12:08 p.m. to</p> <p>22 12:44 p.m.)</p> <p>23 THE VIDEOGRAPHER: We're back on the</p> <p>24 video record at 12:44 p.m.</p> <p>25 Q Good afternoon, Senator Strickland.</p>	<p style="text-align: right;">145</p> <p>1 Republican House members are for the -- United</p> <p>2 States House of Representatives are?</p> <p>3 A If you said their names, I'll</p> <p>4 recognize them.</p> <p>5 Q I'll do that. And if -- I'll go</p> <p>6 fairly slowly, so if you can remember or if you</p> <p>7 can say whether or not you ever heard that</p> <p>8 they --</p> <p>9 A I also can make it easier and say I</p> <p>10 never heard anyone, including any of the</p> <p>11 congressman, ever say that Georgia needed to be</p> <p>12 redistricted.</p> <p>13 Q Okay. That does cut it down. But</p> <p>14 you don't need to have a list of names read --</p> <p>15 A I've never heard any --</p> <p>16 Q -- to reach that conclusion?</p> <p>17 A I never heard anyone say that.</p> <p>18 Q Do you recall ever meeting with any</p> <p>19 United States House representative about</p> <p>20 redistricting either your district or the State</p> <p>21 House in general?</p> <p>22 A No.</p> <p>23 Q How about Governor Deal, do you</p> <p>24 recall anything he said about the need for</p> <p>25 redistricting?</p>
<p style="text-align: right;">144</p> <p>1 A Good afternoon.</p> <p>2 THE VIDEOGRAPHER: Sir, can you put</p> <p>3 your microphone on? Thank you.</p> <p>4 Q Senator Strickland, between 2000 --</p> <p>5 from 2012 until people started talking about</p> <p>6 redistricting, at least when people started</p> <p>7 talking about redistricting in 2014 -- well,</p> <p>8 strike that.</p> <p>9 Do you ever recall the Republican</p> <p>10 leadership in Georgia ever saying that the</p> <p>11 Georgia House needed to be redistricted after</p> <p>12 2012?</p> <p>13 A No.</p> <p>14 Q Do you ever recall United States</p> <p>15 Senator David Perdue ever saying that?</p> <p>16 A No.</p> <p>17 Q How about United States Senator</p> <p>18 Johnny Isakson?</p> <p>19 A No.</p> <p>20 Q Do you recall any United States</p> <p>21 representative for Georgia ever saying the</p> <p>22 Georgia State House needed to be redistricted?</p> <p>23 A No.</p> <p>24 Q And just I'll read the list of</p> <p>25 the -- well, and are you aware of who the</p>	<p style="text-align: right;">146</p> <p>1 A No. I don't recall him ever being</p> <p>2 involved at all in the bill, not that I recall.</p> <p>3 Q How about Speaker David Ralston, did</p> <p>4 you -- did he ever say, to your recollection,</p> <p>5 that the House needed to be redistricted?</p> <p>6 A I never heard anyone say the House</p> <p>7 needed to be redistricted.</p> <p>8 Q Or should be redistricted?</p> <p>9 A Or should be.</p> <p>10 Q So just to finish the list, Speaker</p> <p>11 Pro Tem Jan Jones?</p> <p>12 A No one ever said it.</p> <p>13 Q Do you recall any Democrat, either</p> <p>14 federal, senator or --</p> <p>15 A I recall no Democrat, Republican,</p> <p>16 Independent, Green Party, anyone ever saying</p> <p>17 it, period.</p> <p>18 Q Okay. That's great because we can</p> <p>19 eliminate a lot.</p> <p>20 A There you go. I figured you're</p> <p>21 going to go through. I don't remember anyone</p> <p>22 ever saying that, at any point in my time</p> <p>23 listening, that Georgia should be redistricted,</p> <p>24 redistricted.</p> <p>25 Q Or that revisions should be made to</p>

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<p style="text-align: right;">147</p> <p>1 the redistrict -- the districts?</p> <p>2 A That should be made?</p> <p>3 Q Yes, or need to be made.</p> <p>4 A No. What I recall, as I said</p> <p>5 earlier, is that there were statements made,</p> <p>6 and who said it, I don't know, but amongst</p> <p>7 Democrats and Republicans that we had the</p> <p>8 ability to make revisions.</p> <p>9 And so whether or not that was said</p> <p>10 as a need, I don't know. But it was</p> <p>11 basically -- my understanding was in House</p> <p>12 District 111 at the time that there was an</p> <p>13 opportunity and it was going to be done, and so</p> <p>14 that was why I engaged.</p> <p>15 Q Do you recall what was said, if</p> <p>16 anything, about why the redistricting was going</p> <p>17 to be done in 2015?</p> <p>18 A No, but -- well, that's not true. I</p> <p>19 do remember some reasons, one being, as you</p> <p>20 alluded to, there was some issue about land and</p> <p>21 whether or not someone lived in a particular</p> <p>22 spot.</p> <p>23 I remember there being a debate</p> <p>24 amongst some Democrats about some land in</p> <p>25 Fulton County, I think it was. I was looking</p>	<p style="text-align: right;">149</p> <p>1 came, it was communicated to me, and I believe</p> <p>2 it was at the House as a whole, I'm not sure</p> <p>3 who all it was, but it was communicated to</p> <p>4 everyone at some point that there would be</p> <p>5 these -- and I'm using the word midterm. I</p> <p>6 know that's not the correct terminology -- but</p> <p>7 the midterm in '15 between the '10 and '20</p> <p>8 census revisions made to the maps.</p> <p>9 Q And when you were told that by</p> <p>10 whoever you were told by for the first time,</p> <p>11 did that person or persons tell you why that</p> <p>12 decision had been made by the House or the</p> <p>13 House leadership?</p> <p>14 A No. My recollection is -- was it's</p> <p>15 just how it works, for what it's worth. Part</p> <p>16 of the process.</p> <p>17 Q Do you recall being told that</p> <p>18 during the process before HB 566 or during the</p> <p>19 planning for HB 566 that no changes in</p> <p>20 districts would be made unless all of the</p> <p>21 affected members were in agreement?</p> <p>22 A Yeah. I don't know who said that,</p> <p>23 but someone did say that, which is why I met</p> <p>24 with other representatives that were affected</p> <p>25 by any changes.</p>
<p style="text-align: right;">148</p> <p>1 to see if I saw any notes on that. But there</p> <p>2 was dispute amongst two Democrats about a</p> <p>3 certain area.</p> <p>4 There was also a willingness, I</p> <p>5 think, on both sides to get more Republicans</p> <p>6 or Democrats in certain districts. And there</p> <p>7 obviously was a political side of this too.</p> <p>8 And whether or not that was actually achieved,</p> <p>9 I don't know, but there was also that desire</p> <p>10 as well.</p> <p>11 Q Anything else that you can recall?</p> <p>12 A Not that I recall.</p> <p>13 Q Do you recall representative -- I</p> <p>14 think you mentioned, or let me just -- strike</p> <p>15 that.</p> <p>16 Do you recall an announcement made</p> <p>17 by Representative Nix that the Georgia House</p> <p>18 would consider redistricting during the 2015</p> <p>19 session?</p> <p>20 A I don't recall that. But, again,</p> <p>21 it was communicated to me sometime maybe</p> <p>22 during that session or before -- I think I</p> <p>23 said earlier it could have been '14. It may</p> <p>24 not have been until '15.</p> <p>25 But at some point before the bill</p>	<p style="text-align: right;">150</p> <p>1 Q What did you understand what that</p> <p>2 requirement meant?</p> <p>3 A I think, and this is my</p> <p>4 interpretation, you're not going to make any</p> <p>5 changes that are drastic or that are going to</p> <p>6 really change the intent from 2010. And the</p> <p>7 one way of keeping things minor that wouldn't</p> <p>8 drastically change anything is to make sure</p> <p>9 everybody consents to it.</p> <p>10 And it was also a way of saying</p> <p>11 that if we're going to make any changes -- I</p> <p>12 wasn't there in 2010, but I understand every</p> <p>13 ten years is a big battle amongst the two</p> <p>14 parties when it comes to drawing maps,</p> <p>15 obviously.</p> <p>16 For years, Democrats controlled it.</p> <p>17 Republicans got control of it for the first</p> <p>18 time I think in '10.</p> <p>19 But I remember it also -- the</p> <p>20 interpretation I had was we're not having a</p> <p>21 political fight. Anything we do is going to</p> <p>22 be nonpartisan. It's going to be consented to</p> <p>23 by everyone. And the way to get there was to</p> <p>24 make sure anyone that --</p> <p>25 AUTOMATED MESSAGE: Enter star</p>

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<p style="text-align: right;">151</p> <p>1 one --</p> <p>2 A -- anyone that had any changes that</p> <p>3 were coming would have to consent to that, and</p> <p>4 both parties had to consent to it.</p> <p>5 Because I remember there were</p> <p>6 other, other representatives you have not --</p> <p>7 not mentioned in this, but to Demetrius</p> <p>8 Douglas, Pam Stephenson, Sandra Scott all have</p> <p>9 portions of Henry that are Democrats. And I</p> <p>10 believe they were also in some of these</p> <p>11 communications too and conversations about</p> <p>12 changes in the county as a whole.</p> <p>13 And so it was one of those deals</p> <p>14 where it's not just your neighbors' districts</p> <p>15 that touched you that had to consent that were</p> <p>16 being changed, but it was almost like a county</p> <p>17 consent thing too.</p> <p>18 Q Were any of the counties that</p> <p>19 bordered -- excuse me. Were any of the</p> <p>20 districts that border House District 111</p> <p>21 represented by Democrats?</p> <p>22 A Yes.</p> <p>23 Q Which one was that? Which one or</p> <p>24 ones was that?</p> <p>25 A I don't remember all the numbers,</p>	<p style="text-align: right;">153</p> <p>1 this. But I'm assuming I would have had to</p> <p>2 have at some point. Maybe it wasn't one on</p> <p>3 one. Maybe it was in a group setting about</p> <p>4 the overall process, since he was the author.</p> <p>5 But I don't remember any of that.</p> <p>6 My -- any communication I had would</p> <p>7 have been with the, with the other people in</p> <p>8 the surrounding area, the representatives, and</p> <p>9 Ms. Wright.</p> <p>10 Q Were there any meetings with the --</p> <p>11 when you say any discussions you might have</p> <p>12 had would be within -- would be with the</p> <p>13 representative of the areas surrounding 111;</p> <p>14 is that correct?</p> <p>15 A Yes, I believe so. I don't think I</p> <p>16 would have -- because of the fact we try to</p> <p>17 make it non -- again, noncontroversial, if you</p> <p>18 will, everyone had to agree.</p> <p>19 Q Were -- did you have a group</p> <p>20 meeting with all of the representatives or</p> <p>21 multiple representatives of those districts?</p> <p>22 A I don't remember, but I'll go back</p> <p>23 to what helps my memory is John Yates falling</p> <p>24 asleep, so the fact that I was in a meeting</p> <p>25 with John Yates. And I remember where he was</p>
<p style="text-align: right;">152</p> <p>1 but Demetrius Douglas has a big chunk of</p> <p>2 Clayton County and northwest Henry County that</p> <p>3 borders and still borders 111, I believe. It</p> <p>4 does still border 111.</p> <p>5 And Pam Stephenson had, I think, I</p> <p>6 don't think does anymore, had the northern</p> <p>7 precinct of Stagecoach in 111, the precinct</p> <p>8 that made no sense, as I've said earlier, the</p> <p>9 one at the very top of the district. That was</p> <p>10 bordered by Pam Stephenson and Sandra Scott,</p> <p>11 another Democrat.</p> <p>12 I believe with the '15 changes, I</p> <p>13 think that 111 only -- only Democrat that</p> <p>14 bordered 111 would be Demetrius Douglas.</p> <p>15 Those two were taken away as we saw on those</p> <p>16 maps.</p> <p>17 Q And we've already -- other --</p> <p>18 strike that.</p> <p>19 You may already have answered this</p> <p>20 question, but do you recall any discussions</p> <p>21 with Representative Nix, either in a group</p> <p>22 setting or one to one, where there was a</p> <p>23 discussion about the redistricting of 111?</p> <p>24 A I just don't remember ever having a</p> <p>25 conversation with Representative Nix about</p>	<p style="text-align: right;">154</p> <p>1 because it is so funny. It was with Gina.</p> <p>2 John Yates was present.</p> <p>3 Whether or not any other</p> <p>4 representatives were present, I do not</p> <p>5 remember. But that tells me I probably did</p> <p>6 have a group meeting with those that were</p> <p>7 affected. Whether that was done individually</p> <p>8 or as one group, I don't remember.</p> <p>9 Q And other than the meeting that you</p> <p>10 recall where Mr. Yates fell asleep, do you</p> <p>11 recall specifically any other meetings where</p> <p>12 there was a group of representatives gathered?</p> <p>13 A No, but I -- again, as I said</p> <p>14 earlier too, I think there probably had to</p> <p>15 have been multiple meetings. And I go back to</p> <p>16 the -- it wasn't a battle, but the battle, if</p> <p>17 you will, over how McDonough was going to be</p> <p>18 divided amongst Mr. Rutledge and Mr. Welch and</p> <p>19 myself. And I believe that would have been</p> <p>20 multiple meetings.</p> <p>21 Q And all of those representatives</p> <p>22 you just mentioned are Republican; is that</p> <p>23 correct?</p> <p>24 A Yes.</p> <p>25 Q What was your understanding of the</p>

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<p style="text-align: right;">155</p> <p>1 reapportionment roles -- Reapportionment</p> <p>2 Office's role when it came to the</p> <p>3 redistricting process?</p> <p>4 A So my understanding would be they</p> <p>5 provided maps and they could provide data.</p> <p>6 Q And when you say they could provide</p> <p>7 maps and they could provide data, did they</p> <p>8 provide maps to you and data to you?</p> <p>9 A I don't remember ever actually</p> <p>10 getting anything from them, but I do remember</p> <p>11 looking at maps such as you have here. And I</p> <p>12 think it was all, maybe all computer based, or</p> <p>13 it could have been maps on the wall. I can't</p> <p>14 remember.</p> <p>15 But we did look at data, and it was</p> <p>16 computer based. I do remember that. And I</p> <p>17 remember in particular looking at a benchmark</p> <p>18 political race. And what I mean by that is</p> <p>19 how did Governor Deal perform in 2010 versus</p> <p>20 Roy Barnes, how did Obama and Romney perform</p> <p>21 against each other, and -- this was 2015, so</p> <p>22 how did, I mean, yeah, 2015, how did Deal and</p> <p>23 Jason Carter perform against each other in</p> <p>24 that '14 race.</p> <p>25 And I think, if that's also</p>	<p style="text-align: right;">157</p> <p>1 the redistricting season, as Mr. McDonald</p> <p>2 says. And he says in the next -- this is the</p> <p>3 second paragraph. He says that, "our office</p> <p>4 has established a uniform procedure for all</p> <p>5 members requiring redistricting services."</p> <p>6 A Uh-huh (affirmative).</p> <p>7 Q Do you recall having a uniform</p> <p>8 procedure that you and all -- and others in</p> <p>9 the House were following regarding</p> <p>10 redistricting?</p> <p>11 A Yes. Our -- what I recall is we</p> <p>12 all had the ability to go in and have those</p> <p>13 meetings to discuss any redistricting that</p> <p>14 would be done in 2015, so that's the only</p> <p>15 thing I recall. I don't know of any other</p> <p>16 service they ever provided for me other than</p> <p>17 my meetings over there with them.</p> <p>18 Q And if you turn to the second page</p> <p>19 of the exhibit at the top, you'll see at the</p> <p>20 top it says, this is Individual Projects, it</p> <p>21 says, "Each legislator may schedule an initial</p> <p>22 two-hour appointment to discuss and design a</p> <p>23 district or district plan with a member of the</p> <p>24 reapportionment staff."</p> <p>25 Did you schedule a meeting of this</p>
<p style="text-align: right;">156</p> <p>1 correct, whatever year -- maybe that will get</p> <p>2 to '17, but whatever year Johnny Isakson was</p> <p>3 up for reelection, I remember looking at that,</p> <p>4 those numbers too.</p> <p>5 (Whereupon a document was identified</p> <p>6 as Plaintiff's Exhibit 13.)</p> <p>7 Q Thank you. I wanted to show you a</p> <p>8 document that has been previously marked as</p> <p>9 Exhibit 13, if you could just take a look at</p> <p>10 that, Senator, and let me know if you have</p> <p>11 seen this before.</p> <p>12 A No, not that I recall. This was, I</p> <p>13 guess, before I was in office if it was sent</p> <p>14 in 2011.</p> <p>15 Q Do you recall receiving a copy of</p> <p>16 this when you did take office?</p> <p>17 A No, I don't recall.</p> <p>18 Q The first page is from Jimmy</p> <p>19 McDonald, Executive Director of the</p> <p>20 Legislative & Congressional Reapportionment</p> <p>21 Office. It's to a representative of House</p> <p>22 District 167, Roger Lane; is that correct?</p> <p>23 A It appears to be. I've never seen</p> <p>24 it.</p> <p>25 Q And it talks about certain -- about</p>	<p style="text-align: right;">158</p> <p>1 type, that is, an initial two-hour or</p> <p>2 any-period-of-time meeting to discuss these</p> <p>3 issues?</p> <p>4 A I know that I met with them, as</p> <p>5 I've said several times.</p> <p>6 Q Right.</p> <p>7 A But I don't recall how that was</p> <p>8 scheduled. I'm sure it had to be scheduled</p> <p>9 because I wouldn't just show up there, but I</p> <p>10 may have just shown up and asked when I could</p> <p>11 come back. It may have been that informal,</p> <p>12 because the office was around the corner from</p> <p>13 my office at the time.</p> <p>14 Q I think --</p> <p>15 THE VIDEOGRAPHER: Five, five</p> <p>16 minutes left.</p> <p>17 MR. PHILLIPS: Okay.</p> <p>18 Q So the meeting that you have</p> <p>19 testified that you attended where, I hate to</p> <p>20 say this each time, but where Mr. Yates fell</p> <p>21 asleep, what do you recall that occurred at</p> <p>22 that meeting? If you could describe in as</p> <p>23 much detail as you recall what occurred.</p> <p>24 A I recall looking at maps such as</p> <p>25 the maps you showed me here of the current</p>

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<p style="text-align: right;">159</p> <p>1 district and discussing any changes that we 2 would make. I also recall looking at data, 3 and the data I recall looking at was the 4 population total for a district. 5 I don't remember what that was, but 6 I remember looking at population totals to see 7 if you had any major population shifts, I 8 guess. 9 And I recall looking at the 10 other -- and I'm going to use the word 11 benchmark races again. And I'm not talking 12 about race as a human race. I'm talking about 13 political races -- looking at other races and 14 how people performed in precincts and the 15 district as a whole because, obviously, there 16 would be an advantage if I had the opportunity 17 as a Republican if, if I could, if I were to 18 be able to pick up an area in redistricting 19 where more Republicans -- 20 Republicans had performed better in 21 the past. That would be an obvious advantage 22 for me, even though I always outperformed 23 those other Republicans. That would in theory 24 bring my overall numbers up, so I did look at 25 that too.</p>	<p style="text-align: right;">161</p> <p>1 redistricting project, et cetera. 2 Do you recall signing any maps 3 relating to the redistricting in 2015? 4 A No, but I also don't recall picking 5 up any hard copies of maps either. 6 THE VIDEOGRAPHER: Two minutes. 7 MR. PHILLIPS: Why don't we go off 8 the record. 9 THE VIDEOGRAPHER: Going off the 10 video record at 1:03 p.m. 11 (Proceedings in recess, 1:03 p.m. to 12 1:06 p.m.) 13 THE VIDEOGRAPHER: We're back on 14 the video record. This is the beginning of 15 video file number three. The time is 16 1:06 p.m. 17 Q Senator, I think we've discussed 18 this before. I just wanted to make one 19 question about it and see if I'm correct. 20 Did you discuss any of the 21 estimated demographic changes to your district 22 during the period in which changes to the -- 23 in which you were aware that HB 566 or its 24 equivalent was being considered in 2014, 2015? 25 A Are you saying did I discuss any</p>
<p style="text-align: right;">160</p> <p>1 Q Do you recall what kind of data 2 other than -- I mean, you may -- do you have 3 any more specific recollection about the kind 4 of data that you were represented with? 5 A No, other than what I said. 6 Q If you look at the -- now the third 7 page of Exhibit 13, you'll see that there is a 8 heading on that page number Roman numeral IV, 9 Release of Maps from Reapportionment Office. 10 Do you see that? 11 A Uh-huh, yes. 12 Q Do you recall -- it says, it says, 13 "To pick up a hard copy of a map," this is the 14 second paragraph under that IV, "To pick up a 15 hard copy of a map that has been finalized 16 as" -- strike that. 17 Let me -- in general, could you 18 take a quick look at this paragraph, please, 19 and I'll ask you a general question. 20 A Okay. 21 Q There's a reference here, a couple 22 different references, to maps being signed by 23 the legislator involved, that is, for whom the 24 project was completed, or the signature of the 25 legislator that has sponsored the local</p>	<p style="text-align: right;">162</p> <p>1 changes I saw occurring on the ground, if you 2 will, in my district? Is that what you're 3 saying, or occurring with the legislation? 4 Q On the ground in your district, 5 either that you saw or that you were informed 6 of. 7 A Oh, no. And I was not a -- I was 8 not aware of any changes. The only -- again, 9 the only data I looked at and that I'd know I 10 have would be the how I performed in each 11 election, how other people performed in the 12 election. 13 And there hadn't been another -- it 14 was 2012 the first time I ran, so the only 15 time I really could tell you much would be 16 looking at the '16 numbers versus '12. And so 17 in '15, I wouldn't have known. 18 Q In 2015, were you interested in 19 changing House District 111 because you were 20 concerned that the existing map no longer 21 complied with federal or state law? 22 A I wasn't interested in changing the 23 lines at all. 24 Q So you had no particular desire to 25 change the district at all?</p>

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<p style="text-align: right;">163</p> <p>1 A No.</p> <p>2 Q You didn't seek any, any changes</p> <p>3 whatsoever?</p> <p>4 A I did when I, when I was told that</p> <p>5 changes were going to happen and that we were</p> <p>6 making changes to maps. Then I did.</p> <p>7 Q Okay. But so -- sorry.</p> <p>8 A But I didn't particularly care to</p> <p>9 make any changes personally.</p> <p>10 Q Let me just ask you a series of</p> <p>11 questions just to be sure we have it on the</p> <p>12 record.</p> <p>13 You said once you were told that</p> <p>14 changes would be considered that you -- there</p> <p>15 was some changes that you thought would be a</p> <p>16 good idea, is that correct, generally</p> <p>17 speaking?</p> <p>18 A Yes, yes. That's true.</p> <p>19 Q Did you think that such changes</p> <p>20 would be a good idea because you were</p> <p>21 concerned that the existing map only -- did</p> <p>22 not comply with federal or state law?</p> <p>23 A I don't know because I didn't know</p> <p>24 what the federal and state law was dealing</p> <p>25 with the maps.</p>	<p style="text-align: right;">165</p> <p>1 concerns I had are the ones I testified to</p> <p>2 earlier about the communities being divided</p> <p>3 up.</p> <p>4 Q And I think I asked this before,</p> <p>5 and maybe this goes to the same issue that you</p> <p>6 just mentioned. Were you concerned that the</p> <p>7 existing map of your district didn't</p> <p>8 sufficiently keep together communities of</p> <p>9 interest?</p> <p>10 A Yes.</p> <p>11 Q And that's with regard to the</p> <p>12 cities that you previously mentioned?</p> <p>13 A Yes, and the Eagle's Landing</p> <p>14 community, how it plays into that.</p> <p>15 Q What is --</p> <p>16 A Which is not actually a city.</p> <p>17 Q What is the Eagle's Landing</p> <p>18 community?</p> <p>19 A It's a large country club that is</p> <p>20 located in the southern part of Stockbridge,</p> <p>21 northern part of McDonough, in between the two</p> <p>22 cities. It's been a point of contention for</p> <p>23 some years in the county as to who's going to</p> <p>24 get that property. It's the most valuable</p> <p>25 part of our county landwise.</p>
<p style="text-align: right;">164</p> <p>1 Q Were you --</p> <p>2 A I told you earlier my concerns I</p> <p>3 had with the district as a whole, but I</p> <p>4 don't --</p> <p>5 I'm not sure what -- how that</p> <p>6 complies to -- I'll refer to my lawyer as to</p> <p>7 whether or not those are legal issues. I</p> <p>8 also wanted to say that -- whether or not</p> <p>9 those were legal issues the district had or</p> <p>10 just issues I saw personally.</p> <p>11 Q Okay. But I don't want you to</p> <p>12 reveal any attorney-client communications, of</p> <p>13 course. But do you recall in any general</p> <p>14 sense either being informed that there were</p> <p>15 problems with federal or state law with regard</p> <p>16 to your --</p> <p>17 A No.</p> <p>18 Q -- district boundaries?</p> <p>19 A No, never.</p> <p>20 Q How about were you concerned about</p> <p>21 whether or not the existing map had unequal</p> <p>22 population deviations that you -- that needed</p> <p>23 to be corrected?</p> <p>24 A I don't know what you mean by</p> <p>25 "unequal population deviations." The only</p>	<p style="text-align: right;">166</p> <p>1 And Stockbridge, the city has taken</p> <p>2 property, annexed it around the club. But the</p> <p>3 club still uses a McDonough address, and so</p> <p>4 it's an ongoing battle.</p> <p>5 And the district, when it was done</p> <p>6 in 2010, went all around the club, did not</p> <p>7 have the club. Maybe whoever had 110 at the</p> <p>8 time had more power and wanted to keep the</p> <p>9 club for donors. I don't know, but it made no</p> <p>10 sense.</p> <p>11 Q And what happened in 2015 in --</p> <p>12 with --</p> <p>13 A Yeah.</p> <p>14 Q -- if anything, regarding that</p> <p>15 property?</p> <p>16 A We -- I was able to get the entire</p> <p>17 club into 111. It's now -- it's no longer --</p> <p>18 it was no longer divided. The club itself was</p> <p>19 no longer divided as it previously was.</p> <p>20 Q Were you concerned during the time</p> <p>21 period that you were thinking about changes to</p> <p>22 your district, 2015, 2014, that the existing</p> <p>23 map unduly split voting precincts?</p> <p>24 A I don't -- not sure I was, I was</p> <p>25 actually considering whether or not changes</p>

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<p style="text-align: right;">167</p> <p>1 needed to happen in 2014, so.</p> <p>2 Q Okay.</p> <p>3 A But to the extent I ever --</p> <p>4 Q Point taken.</p> <p>5 A -- considered any changes, I don't</p> <p>6 remember any issues of actually splitting</p> <p>7 precincts individually, whether or not that</p> <p>8 was an issue. But it would be an issue if</p> <p>9 it -- if a split precinct was splitting a</p> <p>10 city, which we had happen in one precinct in</p> <p>11 Stockbridge in particular where, just to make</p> <p>12 the line continue, there was a police -- a</p> <p>13 precinct that was split just so you could get</p> <p>14 to a bigger precinct on top of that, north of</p> <p>15 that.</p> <p>16 There's probably some history to</p> <p>17 that. I wasn't there in 2010 when that was</p> <p>18 done, but.</p> <p>19 (Whereupon a document was identified</p> <p>20 as Plaintiff's Exhibit 283.)</p> <p>21 MR. PHILLIPS: I wanted to turn to</p> <p>22 a document that was actually created by our</p> <p>23 office. I'd like to mark this as Exhibit 283.</p> <p>24 And I believe Ms. Green used the same document</p> <p>25 in a deposition earlier, Mr. Khoury.</p>	<p style="text-align: right;">169</p> <p>1 MR. PHILLIPS: I haven't had a</p> <p>2 chance to read it.</p> <p>3 Q But for the purposes of this</p> <p>4 deposition, I'd like to know with whom --</p> <p>5 whether you know -- first of all, whether</p> <p>6 you've discussed the redistricting process</p> <p>7 with any of these people and, second, whether</p> <p>8 you were told if you did not discuss it, had</p> <p>9 any communications with any of these</p> <p>10 individuals about the redistricting process,</p> <p>11 written or by email or whatever, and, finally,</p> <p>12 that you were told or understood were involved</p> <p>13 in the process.</p> <p>14 And if you could just check those</p> <p>15 people that you understood were to be involved</p> <p>16 in the process so that then I can -- in the</p> <p>17 sense that I have defined it.</p> <p>18 A Uh-huh (affirmative).</p> <p>19 Q And then if you check those, I</p> <p>20 can -- I may ask you some questions about</p> <p>21 them. I don't want to ask you to go down the</p> <p>22 whole thing in order.</p> <p>23 A Well, the only person I know that I</p> <p>24 met with other than, I can recall exactly,</p> <p>25 other than John Yates and the other</p>
<p style="text-align: right;">168</p> <p>1 MR. KHOURY: Yeah, I remember it.</p> <p>2 MR. PHILLIPS: You do or do not?</p> <p>3 MR. KHOURY: I do remember it.</p> <p>4 Q And again I emphasize that this is</p> <p>5 a document that was created by our office.</p> <p>6 And the purposes of the office as a general</p> <p>7 question, whether -- which of these people</p> <p>8 listed on this chart that you are aware was at</p> <p>9 any point involved in the redistricting</p> <p>10 process for House District 111 that resulted</p> <p>11 in HB 566?</p> <p>12 MR. KHOURY: And I just want to say</p> <p>13 here that there was some issue with</p> <p>14 Representative Chandler on what -- we need to</p> <p>15 define what it means to be involved because,</p> <p>16 otherwise, we're going to get --</p> <p>17 MR. PHILLIPS: Right.</p> <p>18 MR. KHOURY: -- the same document</p> <p>19 but a different understanding --</p> <p>20 MR. PHILLIPS: Right.</p> <p>21 MR. KHOURY: -- of what's being</p> <p>22 indicated on it.</p> <p>23 MR. PHILLIPS: Unfortunately, I was</p> <p>24 not at the deposition.</p> <p>25 MR. KHOURY: Right.</p>	<p style="text-align: right;">170</p> <p>1 representatives of Henry County that have</p> <p>2 Henry County, would be Gina Wright. And so I</p> <p>3 know Gina Wright, I would check. And I would</p> <p>4 check everybody on the Reapportionment</p> <p>5 Committee because they were all part of the</p> <p>6 general discussion about the bill, all voted</p> <p>7 for the bill twice, out of committee and on</p> <p>8 the floor.</p> <p>9 And the GOP leadership, I do</p> <p>10 recall, again, the communication from the</p> <p>11 Speaker's office to everyone about -- and it</p> <p>12 may have come from the majority leader's</p> <p>13 office.</p> <p>14 I saw there was an email from</p> <p>15 someone from his office, someone in</p> <p>16 leadership, communicating to us about the</p> <p>17 process, about it being, again, the midterm, I</p> <p>18 keep calling it that process, and about</p> <p>19 getting the consent of everyone before you do</p> <p>20 anything. So who that was in there, I do not</p> <p>21 know.</p> <p>22 And I don't recall anything from</p> <p>23 legislative counsel at all, anyone being</p> <p>24 involved in any way.</p> <p>25 Q So just to summarize, and we don't</p>

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<p style="text-align: right;">171</p> <p>1 have to do this in writing necessarily, you 2 remember Ms. Wright? 3 A Yes. 4 Q Any other members of the 5 Reapportionment Office? 6 A No. 7 Q Those listed here? 8 A No. 9 Q And the Reapportionment Committee, 10 you feel that you discussed the redistricting 11 of House 111 with each one of them? 12 A Yes, because they all had to review 13 it and voted on it. 14 MR. KHOURY: Let's -- I think he 15 did not hear the question correctly. Can you 16 read that question back? Because that wasn't 17 the testimony. 18 (Whereupon the court reporter read back 19 the referred-to portion as follows:) 20 Q And the Reapportionment Committee, 21 you feel that you discussed the redistricting 22 of House 111 with each one of them? 23 (Whereupon the reading back was 24 concluded.) 25 A I did not personally discuss the</p>	<p style="text-align: right;">173</p> <p>1 Q Okay. And I don't want to, I don't 2 want to misrepresent your testimony. But I 3 believe, and correct me if I'm wrong, you 4 testified that you spoke to someone, to 5 someone in the Speaker's office but couldn't 6 recall who it was, or at least you 7 communicated with them? 8 A I don't know. I know that it was 9 just general discussions with leadership about 10 the rules of it, if you will, that everyone 11 had to consent, it's nonpartisan, and all the 12 stuff we discussed. 13 Q Did you receive any direction from 14 anyone as to what changes should be made in 15 your county? 16 A No. 17 Q Did any of the representatives of 18 districts in your -- that bordered your 19 district ask you to make changes, certain 20 changes to your district? 21 A Yes. 22 Q And who was that? Who were those 23 people? 24 A Dale Rutledge. And I say they 25 asked me. They -- they're part of the</p>
<p style="text-align: right;">172</p> <p>1 issue. What I meant by that is they were all 2 involved in the process. They all, they all 3 reviewed the legislation and voted it out of 4 committee, and then they all voted for it on 5 the floor of the House. 6 But I did not discuss it with any 7 of them that I remember, other than any of 8 them that have districts that border me or in 9 Henry County, which may include Sandra Scott, 10 does include John Yates. But I don't remember 11 Sandra Scott being at a meeting. 12 But I'm sure at some point it was 13 discussed because it affected Henry County. 14 Q During the time that you were 15 discussing redistricting in general, not with 16 anyone in particular, but during that process, 17 did you meet with the Reapportionment 18 Committee as a whole? 19 A No. 20 Q Did you testify before any members 21 of the Reapportionment -- 22 A No. 23 Q -- Reapportionment Committee? 24 A I didn't testify at all about the 25 bill.</p>	<p style="text-align: right;">174</p> <p>1 conversation, had thoughts. And as I've 2 testified to earlier, he was looking at moving 3 into downtown McDonough. 4 Andy Welch also had an interest, 5 just more personally, in having more 6 McDonough. He didn't win that battle. He 7 grew up -- his dad still lives in near 8 downtown. And I think he probably thought -- 9 I'm putting words in his mouth. He'll 10 testify, I guess. 11 But he may have been thinking in 12 the long-term one day he may want to move to 13 his family's property that's in the area, and 14 so he had an interest there too. 15 And so I remember particular 16 discussions about McDonough and the square 17 area around that with Dale Rutledge and Andy 18 Welch. 19 Q Anyone else who you recall asking 20 you or seeking particular revisions to your 21 district? 22 A No, I don't believe so. It was 23 just those two. 24 Q Do you recall anyone saying that 25 they wanted to make changes to your district</p>

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<p style="text-align: right;">175</p> <p>1 to benefit their district because they thought 2 their district would be a stronger base for 3 their future elections, that is, that they 4 would favor Republicans, their district would 5 favor Republicans as a result of changes to 6 District 111? 7 A I don't believe so. The only 8 reason I'm thinking about it is I'm -- the 9 area that Dale Rutledge wanted in 111 was 10 historically a very Republican area. And so 11 you can argue indirectly he was trying to get 12 more Republican voters, but that's not why he 13 was saying that. It was a personal reason. 14 Q And what was the area in -- is that 15 McDonough, did you say? 16 A It's in McDonough. 17 Q What particular region of McDonough 18 is that? 19 A It's the precinct, I think, is the 20 McDonough Central precinct. And you'll see 21 today still, 111 has just a portion of that 22 precinct, not the whole precinct. 23 Q And 111 at the time before the 2015 24 redistrict also just had a portion of that 25 precinct?</p>	<p style="text-align: right;">177</p> <p>1 how that works at the House. And so they rely 2 so much on us, it's very important to them who 3 they have. And there's also -- I believe it's 4 actually in our local rules that if you're the 5 representative who actually has part of that 6 city, you're the one that gets a say in that. 7 And so when you have a city divided 8 by three of us, it takes three of us to get to 9 consent versus one. 10 Q This document that we've been 11 looking at has a section on the right-hand 12 side that's headed Others. Do you see that? 13 A Uh-huh (affirmative). 14 Q Other than the people you've 15 already discussed that appear on this, the 16 ones you've already mentioned of those who are 17 named on this chart, are there any others with 18 whom you were involved in the redistricting 19 process as I defined that, that is, 20 communications, discussions, or you were told 21 that they were involved, with regard to 22 District 111? 23 A The only person I might add there 24 would be Stacey Abrams, minority leader in the 25 House. It was communicated to me that she was</p>
<p style="text-align: right;">176</p> <p>1 A Yeah. I was able to get a little 2 bit more of it. If I -- I think I picked up 3 more of the downtown area in discussing it 4 with Representatives Rutledge and Welch. 5 My office is also located there, 6 and so that's another personal interest. But 7 it goes from the taking the personal part 8 out -- I had not -- I did not have intentions 9 to move there at the time, though I have 10 recently since then moved to that area too. 11 But it -- I thought it was 12 important to have one representative to have 13 the whole McDonough area and not have it 14 divided up. 15 Q I'm not sure I've asked you this 16 question. Why did you think that was 17 important? 18 A It's just a community interest. 19 Again, what most people don't realize, the 20 biggest part of our job is we get calls from 21 city managers, councilmen. And anything they 22 want to do with annexation or with their 23 districting process or with anything with 24 their charter, they have to go through us. 25 We have local rules that delegate</p>	<p style="text-align: right;">178</p> <p>1 in consent with the changes that were being 2 proposed by the Republicans, which is part of 3 the reason it was bipartisan. 4 And so that was, that was another 5 thing that was important in getting everyone's 6 consent was to not have, as we're seeing with 7 this lawsuit now, a partisan battle over this 8 issue. 9 And so I don't remember if I had 10 discussed that directly with her. I also had 11 an office near her. But it was my 12 understanding that she was also involved and 13 consented to the changes to 111. 14 Q And she was not a representative of 15 any of the, of any of the districts bordering 16 111; is that correct? 17 A No, but she was directly involved 18 because her party had targeted 111 trying to 19 pick it up, and so I think it was important 20 that she consented to any changes. That way, 21 there wouldn't be any arguments, as we now 22 have, in a lawsuit that we did this for any 23 political reasons. 24 Q Well, okay. Is it your 25 understanding that the lawsuit is about</p>

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<p style="text-align: right;">179</p> <p>1 political --</p> <p>2 A Yes, 100 percent.</p> <p>3 Q -- issues? Not racial issues?</p> <p>4 A No. It's all political.</p> <p>5 Q I see. So do you know if</p> <p>6 Ms. Abrams had any particular involvement, and</p> <p>7 I may have misinterpreted your response, in</p> <p>8 the particular lines drawn with regard to</p> <p>9 District 111, the redistricting?</p> <p>10 A I believe she did because I believe</p> <p>11 she consented to it. When you have</p> <p>12 legislation going to the floor such as this,</p> <p>13 it was important that both sides of the aisle,</p> <p>14 Republicans, Democrats, consented to it. If</p> <p>15 they weren't going to, maybe -- it may still</p> <p>16 would have moved and been a floor debate.</p> <p>17 But I know that it was communicated</p> <p>18 to me that she had signed off on the changes</p> <p>19 that were being proposed.</p> <p>20 Q But you didn't actually discuss</p> <p>21 individually with her?</p> <p>22 A I don't remember. I don't think I</p> <p>23 did, but I did have some conversations with</p> <p>24 her in general. Despite the fact she worked</p> <p>25 against me, I was always friendly with her. I</p>	<p style="text-align: right;">181</p> <p>1 again, I'll go back and say a race that you</p> <p>2 think was most Republicans voted for this</p> <p>3 Republican, most Democrats voted for this</p> <p>4 Democrat.</p> <p>5 If you have a political race you</p> <p>6 can look at like that, you can look at</p> <p>7 individual precincts. And that's what I did.</p> <p>8 I made assumptions. My assumptions are never</p> <p>9 correct because I always did better, unless I</p> <p>10 just got Democrats to vote for me, than the</p> <p>11 other people I looked at.</p> <p>12 But if you could take a race, you</p> <p>13 say, well, they seem to have the party behind</p> <p>14 both candidates, and you could look at parties</p> <p>15 based on precincts.</p> <p>16 Q What about at the street level, at</p> <p>17 individual streets? Do you have availability</p> <p>18 of party information, Republicans versus</p> <p>19 Democrats --</p> <p>20 A I don't know how you would do --</p> <p>21 Q -- at the street level?</p> <p>22 A I don't know how you would do that,</p> <p>23 no, not in my opinion. I've never seen that.</p> <p>24 Everything I've ever looked at would be</p> <p>25 precincts.</p>
<p style="text-align: right;">180</p> <p>1 was on panels with her. I think she's a very</p> <p>2 smart person and a really good politician, so</p> <p>3 I've always respected her.</p> <p>4 Q Okay. Do you have an understanding</p> <p>5 as to what tools are available to draw a</p> <p>6 district map or redraw a district map,</p> <p>7 technical tools?</p> <p>8 A No.</p> <p>9 Q Do you know whether software is</p> <p>10 available to assist in that process?</p> <p>11 A No.</p> <p>12 Q With regard to data, do you believe</p> <p>13 you can see party information at the precinct</p> <p>14 level?</p> <p>15 A Help me again, what you mean by</p> <p>16 "the precinct." By looking at individual</p> <p>17 precincts?</p> <p>18 Q Yes. Can you see party</p> <p>19 information, that is, who is Republican, who</p> <p>20 is Democratic, how -- what the proportion of</p> <p>21 Democratic versus Republican --</p> <p>22 A All you can --</p> <p>23 Q -- at the precinct level?</p> <p>24 A Yes, but I've got to qualify that.</p> <p>25 Only if you can have a benchmark race. And</p>	<p style="text-align: right;">182</p> <p>1 Q Can you -- do you know if you can</p> <p>2 see information relating to the racial makeup</p> <p>3 of a precinct?</p> <p>4 A I don't know.</p> <p>5 Q Did you ever look at that in the</p> <p>6 context --</p> <p>7 A No.</p> <p>8 Q -- of redistricting?</p> <p>9 A No. What I looked at would be,</p> <p>10 again, the political -- I use race a lot. I</p> <p>11 mean political race, another race I would look</p> <p>12 at. But I don't remember seeing the national</p> <p>13 origin or ethnicity of any people in a certain</p> <p>14 precinct. I'm not sure you can even tell that</p> <p>15 anyway.</p> <p>16 Q When you -- you said, I believe,</p> <p>17 that there were maps projected or on the</p> <p>18 computer when you had the meeting with the</p> <p>19 Reapportionment Office. Is that correct?</p> <p>20 A Yes, I remember looking at existing</p> <p>21 maps and then looking at -- I believe the way</p> <p>22 it would work in the software is you could</p> <p>23 then click on a certain other area and change</p> <p>24 the map and then look at the data that goes</p> <p>25 with that.</p>

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<p style="text-align: right;">183</p> <p>1 Q When you were viewing this map, 2 could you see information with regard to the 3 party affiliation of residents? 4 A Yes. But again, it's with the 5 assumption that the other race I'm looking at, 6 political race I'm looking at, if it went by 7 party line, then that was how I would look at 8 it. 9 Q Did you see or could you see race 10 information, racial information, with regard 11 to the -- on the map or with -- in connection 12 with -- 13 A Yeah. 14 Q -- the drawing of the maps? 15 A I don't know. That would be a good 16 question for Reapportionment, but I don't 17 remember seeing racial information. 18 Q Did you see information at the 19 level of individual precincts? 20 A Do you mean with race or -- 21 Q Either. 22 A I don't -- 23 Q Or any information at the precinct 24 level. 25 A Yeah. So I know, and I think this</p>	<p style="text-align: right;">185</p> <p>1 splitting a precinct? 2 A Yes. 3 Q Do you believe splitting a precinct 4 to remove African-American voters from a 5 district is an appropriate reason to split a 6 precinct? 7 A No. 8 Q Do you believe splitting a precinct 9 to gain white voters is an appropriate reason? 10 A No. I don't think race should be a 11 factor whatsoever. 12 Q Do you believe splitting a precinct 13 to remove Democratic voters is an appropriate 14 reason? 15 A I guess I don't know what the legal 16 side of it is, but I think from a political 17 standpoint my understanding is, if the party 18 is control then, yes, that could be a reason 19 they could do it. 20 In the 111, speaking for that in 21 particular, I don't recall any political 22 advantage. Despite what you may be contending 23 in the case, your side may be contending, I 24 don't remember any advantage that I was able 25 to get politically from any redistricting.</p>
<p style="text-align: right;">184</p> <p>1 may just be me, I know that I always look 2 precinct by precinct, even my Senate race 3 recently. I go online to the Secretary of 4 State and the County site and look at how 5 people vote precinct by precinct. 6 So I may be getting the two mixed 7 up. Whether or not I did that in 8 Reapportionment, I don't remember. 9 Q How about in the map or maps that 10 you saw at this meeting, could you tell where 11 precincts were split by district lines? 12 A Yes. It looks similar -- I believe 13 it's similar to the maps you have here. You 14 can see precincts on those maps, if you know 15 what you're looking at. I know -- I've 16 learned the precincts in running campaigns, 17 so. 18 Q Could you see where district 19 line -- or could you see individual streets on 20 the maps that you were reviewing? 21 A Yes, I believe so, at least major 22 roads, but I would know the streets. I would 23 be able to tell which streets were where. 24 Q Do you reason -- do you believe 25 that there are some reasons that justify</p>	<p style="text-align: right;">186</p> <p>1 It came down to more of the, of the 2 city issue, the personal issues, than it did 3 any political issues with 111. I'm not sure 4 if that was the case in every, every county. 5 But one of the unique things about 6 Henry County, one of the great things about 7 Henry County, is, when it comes to race or 8 when it comes to politics, you can't look at 9 particular parts of the county and guess the 10 kind of person that's there or how they vote 11 in that area. 12 It's a very diverse county across 13 the county. And that's why you'll see Obama 14 win a precinct in the southern part and in the 15 northern part but in between there you'd see 16 Romney win precincts. And the same thing 17 happened this last time with Trump and 18 Hillary. 19 So it's -- Henry County is a unique 20 place where you couldn't just take a line and 21 move it and get any political advantage 22 anywhere. 23 Q But is it correct, though, in your 24 view at least, splitting a precinct to remove 25 Democratic voters is an appropriate reason to</p>

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<p style="text-align: right;">187</p> <p>1 do that split?</p> <p>2 A I don't know the legal appropriate</p> <p>3 reasons.</p> <p>4 Q I'm not asking about a legal</p> <p>5 opinion.</p> <p>6 A Just my personal opinion?</p> <p>7 Q Yeah.</p> <p>8 A Just to remove Democrats?</p> <p>9 Q Or to gain Republicans.</p> <p>10 A Yeah, I think that's fine.</p> <p>11 Q Now, in the redistricting in 2015,</p> <p>12 the redistricting was done by the legislature;</p> <p>13 is that correct?</p> <p>14 A That's my understanding. It was a</p> <p>15 bill that was passed.</p> <p>16 Q Have you ever discussed whether an</p> <p>17 independent commission should be drawing or</p> <p>18 redrawing district lines as opposed to the</p> <p>19 legislator -- legislature?</p> <p>20 A Yes. At that forum that you had</p> <p>21 the article for in December of last year, I</p> <p>22 think it's the only time I've ever discussed</p> <p>23 that, but we discussed that at a forum.</p> <p>24 Q Did you, did you have a view on</p> <p>25 that?</p>	<p style="text-align: right;">189</p> <p>1 as a representative of the state of Georgia</p> <p>2 that you are -- would be familiar?</p> <p>3 A No.</p> <p>4 Q So you don't believe the Voting</p> <p>5 Rights Act has anything to say about how</p> <p>6 voters -- how voting should take place in</p> <p>7 Georgia?</p> <p>8 MR. KHOURY: Objection to the form</p> <p>9 of the question.</p> <p>10 A Yeah. I don't know what it says.</p> <p>11 I haven't read it.</p> <p>12 Q That's my point. You haven't read</p> <p>13 it. Do you feel you should have read it?</p> <p>14 A No. I haven't had to deal with</p> <p>15 that issue.</p> <p>16 Q Did you feel when you were --</p> <p>17 during the redistricting process, or now, were</p> <p>18 there limits on how you could redraw the</p> <p>19 lines, what changes you could make?</p> <p>20 A Yes.</p> <p>21 Q What effect did those limits --</p> <p>22 what type of limits are you thinking of?</p> <p>23 A That it had to be, had to be</p> <p>24 consented to by everyone, which puts limits in</p> <p>25 itself. There's very little you can do when</p>
<p style="text-align: right;">188</p> <p>1 A Yes. It was expressed earlier in</p> <p>2 my testimony.</p> <p>3 Q During the redistricting process,</p> <p>4 did you discuss whether or not the</p> <p>5 Constitution of the United States had anything</p> <p>6 to say about redistricting?</p> <p>7 A No.</p> <p>8 Q Did you ever refer to the</p> <p>9 Constitution of the United States?</p> <p>10 A No.</p> <p>11 Q You took an oath to uphold the</p> <p>12 Constitution of the United States; correct?</p> <p>13 A Correct.</p> <p>14 Q Do you believe you uphold the</p> <p>15 Constitution of the United States in the</p> <p>16 process of redistricting?</p> <p>17 A Yes.</p> <p>18 Q Did you discuss the Voting Right --</p> <p>19 Voting Rights Act in the process of</p> <p>20 redistricting?</p> <p>21 A No.</p> <p>22 Q Are you familiar with the</p> <p>23 provisions of the Voting Rights Act?</p> <p>24 A I am not.</p> <p>25 Q Do you think it would be important</p>	<p style="text-align: right;">190</p> <p>1 you have to have everybody on the same page.</p> <p>2 It's -- what's rare and what's unique about</p> <p>3 this process and this bill was it was one of</p> <p>4 the few times that every person on the floor</p> <p>5 voted the same way and everybody came to the</p> <p>6 same agreement.</p> <p>7 That's what's funny to me about</p> <p>8 this whole lawsuit is the -- it's a political</p> <p>9 fight now. But in 2015, every Republican and</p> <p>10 Democrat agreed to what was being done. No</p> <p>11 one thought it was a political fight until the</p> <p>12 '16 elections didn't go as people thought.</p> <p>13 Q Senator Strickland, just -- I just</p> <p>14 want to remind you that I'm asking the</p> <p>15 questions and you are answering the questions.</p> <p>16 A And that's exactly what I'm doing.</p> <p>17 Q I recognize and everybody</p> <p>18 recognizes what the vote in the House of</p> <p>19 Representatives of Georgia was on this bill.</p> <p>20 A Well, it's important that I --</p> <p>21 Q So --</p> <p>22 A -- state that.</p> <p>23 Q -- I didn't say it was not</p> <p>24 important.</p> <p>25 A I'm going to keep saying it.</p>

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<p style="text-align: right;">191</p> <p>1 Q You've stated that many times.</p> <p>2 A You're not going to tell me what to</p> <p>3 say or not to say. I'm going to answer your</p> <p>4 questions. Apparently, you don't know how the</p> <p>5 vote was.</p> <p>6 Q I do.</p> <p>7 A Okay. What was the vote?</p> <p>8 Q It was, it was unanimous.</p> <p>9 A 180 to what? Nothing?</p> <p>10 Q That's what the meaning of</p> <p>11 unanimous is, right, Mr. Strickland?</p> <p>12 A At least you know that.</p> <p>13 Q Yes, I do.</p> <p>14 MR. KHOURY: All right. Let's --</p> <p>15 A You should reference that in your</p> <p>16 lawsuit.</p> <p>17 MR. KHOURY: Let's, let's get back</p> <p>18 to asking questions.</p> <p>19 MR. PHILLIPS: I don't -- Counsel,</p> <p>20 I do not want your client -- I know he's a</p> <p>21 politician, but I do not need</p> <p>22 political speeches --</p> <p>23 THE WITNESS: You're a politician</p> <p>24 here.</p> <p>25 MR. PHILLIPS: No, I'm not.</p>	<p style="text-align: right;">193</p> <p>1 MR. PHILLIPS: No, I'm not.</p> <p>2 MR. KHOURY: Let's take -- let's go</p> <p>3 off the record for just a few minutes.</p> <p>4 THE VIDEOGRAPHER: Going off the</p> <p>5 video record at 1:35 p.m.</p> <p>6 (Proceedings in recess, 1:35 p.m. to</p> <p>7 1:38 p.m.)</p> <p>8 THE VIDEOGRAPHER: We're back on</p> <p>9 the video record at 1:38 p.m.</p> <p>10 Q Senator Strickland, did</p> <p>11 Representative Nix or anyone representing --</p> <p>12 representing Mr. Nix give you or present to</p> <p>13 you guidelines on what proposed changes could</p> <p>14 be made to your district?</p> <p>15 And I'm not speaking in detailed</p> <p>16 precinct by precinct, for example, but rather</p> <p>17 general guidelines that should be used to</p> <p>18 determine what changes you could request in</p> <p>19 your district.</p> <p>20 A The only thing I remember is the</p> <p>21 rule I testified to earlier about everyone</p> <p>22 consenting, but I don't know if that came from</p> <p>23 his office. I don't know -- you don't have</p> <p>24 his office staff listed here. I don't recall,</p> <p>25 when you say his office, his office doing</p>
<p style="text-align: right;">192</p> <p>1 THE WITNESS: Yes, you are. You're</p> <p>2 acting as a politician.</p> <p>3 MR. KHOURY: Hold on. Hold on.</p> <p>4 Let's take --</p> <p>5 The senator has the -- a right to</p> <p>6 give whatever answer he feels is appropriate.</p> <p>7 If you don't like his answer, you can ask him</p> <p>8 a follow-up question.</p> <p>9 If you feel that he's stalling you</p> <p>10 with your answer, we can discuss that, but I</p> <p>11 haven't seen that.</p> <p>12 MR. PHILLIPS: I have.</p> <p>13 MR. KHOURY: And, you know, your --</p> <p>14 some of your remarks back to him have been</p> <p>15 very cagy, very catty.</p> <p>16 THE WITNESS: And you're smirking</p> <p>17 at me, you can't see on the camera, as you do</p> <p>18 right now.</p> <p>19 MR. KHOURY: Senator, let's just --</p> <p>20 MR. PHILLIPS: I am not smirking --</p> <p>21 THE WITNESS: Yes, you are.</p> <p>22 MR. PHILLIPS: -- Senator</p> <p>23 Strickland.</p> <p>24 THE WITNESS: You're consistently</p> <p>25 smirking at me.</p>	<p style="text-align: right;">194</p> <p>1 anything.</p> <p>2 I'm sure they carried the bill and</p> <p>3 was involved. I don't recall any</p> <p>4 communication from his office or him directly</p> <p>5 on this.</p> <p>6 Q Any written or oral communication?</p> <p>7 A Not that I recall.</p> <p>8 Q On that subject. Sorry.</p> <p>9 A On any subject with this.</p> <p>10 Q Okay.</p> <p>11 A Yeah.</p> <p>12 Q Did you recall anyone ever telling</p> <p>13 you that the new lines couldn't jeopardize the</p> <p>14 2012 map?</p> <p>15 A No. I don't know what that means,</p> <p>16 though. Again, the only, the only rules that</p> <p>17 I remember, if there were rules, would be that</p> <p>18 everyone consented to it. But I don't know if</p> <p>19 there was any other guidelines that we had or</p> <p>20 didn't have in this process. That's all I</p> <p>21 remember.</p> <p>22 Q I just want to ask one question to</p> <p>23 sort of set up the next two -- next couple of</p> <p>24 questions.</p> <p>25 Do you recall ever anybody telling</p>

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<p style="text-align: right;">195</p> <p>1 you that the new lines couldn't jeopardize the</p> <p>2 2012 map in the sense that it could not</p> <p>3 jeopardize the map in a way that would have</p> <p>4 changed the fact that the 2012 map was</p> <p>5 precleared by the Justice Department of the</p> <p>6 United States?</p> <p>7 A Oh, I don't know. I don't know.</p> <p>8 Q Who do you believe is responsible</p> <p>9 for making sure changes to your district, the</p> <p>10 changes that were made to your district, were</p> <p>11 in compliance with the Constitution of the</p> <p>12 United States or federal law in general?</p> <p>13 A I'd say the same with any bill that</p> <p>14 we have because most of us are not lawyers,</p> <p>15 and even -- all of us that are lawyers only</p> <p>16 know certain parts of the law. We're not</p> <p>17 experts in everything.</p> <p>18 But we rely on legislative counsel,</p> <p>19 the office, to tell us if something is</p> <p>20 unconstitutional. I'd also personally would</p> <p>21 probably rely on the Reapportionment Office to</p> <p>22 also tell me what guidelines they have to</p> <p>23 follow.</p> <p>24 But the general rule we have is,</p> <p>25 when no one tells you it's not un -- no one</p>	<p style="text-align: right;">197</p> <p>1 acceptable to them, that is, any of the</p> <p>2 districts bordering your district?</p> <p>3 A Yes.</p> <p>4 Q And who, what -- who told you that?</p> <p>5 A And that goes back to my</p> <p>6 conversations with Representative Rutledge and</p> <p>7 Welch. That's all I recall. And I'm not</p> <p>8 saying they said this is not unacceptable.</p> <p>9 But I know when looking, if my</p> <p>10 memory serves correct, when I first was</p> <p>11 looking at McDonough, and that's why I'm</p> <p>12 thinking there was more than one meeting, is I</p> <p>13 remember wanting to put all of the city, if</p> <p>14 you're taking out Stockbridge is what --</p> <p>15 We were taking out Stockbridge and</p> <p>16 Hampton and making it McDonough, Locust Grove,</p> <p>17 and, again, getting the communities back</p> <p>18 together. I remember Dale Rutledge and maybe</p> <p>19 Andy Welch, I don't recall, not liking my idea</p> <p>20 of doing that with McDonough.</p> <p>21 And it was, again, personal reasons</p> <p>22 for Representative Rutledge.</p> <p>23 Q And I'm sorry. You mentioned a</p> <p>24 community or an area, Locust --</p> <p>25 A Locust Grove.</p>
<p style="text-align: right;">196</p> <p>1 tells you it's unconstitutional, then you</p> <p>2 typically don't worry about it. That's</p> <p>3 because you'll find out quickly because</p> <p>4 legislative counsel reviews every bill, they</p> <p>5 write every bill, if there's constitutional</p> <p>6 issues with it.</p> <p>7 They'll do a letter they put on top</p> <p>8 of the bill to us, and your bill's not going</p> <p>9 far, even though it doesn't kill the bill, it</p> <p>10 always kills the bill when the first thing</p> <p>11 people see is this is unconstitutional.</p> <p>12 Q Did anyone ever tell you that any</p> <p>13 proposed change to your district would not be</p> <p>14 in compliance with federal law?</p> <p>15 A No.</p> <p>16 Q Did anyone ever tell you -- strike</p> <p>17 that.</p> <p>18 I recognize that you said that</p> <p>19 everyone had to be in agreement with regard --</p> <p>20 everyone at least of those who were affected</p> <p>21 by any changes had to be in agreement with</p> <p>22 those changes; is that correct?</p> <p>23 A Yes.</p> <p>24 Q Did anyone ever tell you that a</p> <p>25 proposed change to your district was not</p>	<p style="text-align: right;">198</p> <p>1 Q What is Locust Grove?</p> <p>2 A It's a city in southeast Henry</p> <p>3 County that is -- 111 has always had the</p> <p>4 majority of Locust Grove. It's left out of</p> <p>5 the conversation a lot because most of that</p> <p>6 community always has been kept together, at</p> <p>7 least with the House districts.</p> <p>8 Q I see. And I'm sorry. What was</p> <p>9 the result, if any? Was there any change in</p> <p>10 the treatment of Locust Grove as a result of</p> <p>11 the 2015 redistricting?</p> <p>12 A There was an additional precinct in</p> <p>13 east Locust Grove that was picked up when you</p> <p>14 take 111. 111 was a long, narrow -- it was</p> <p>15 kind of a narrow line. I don't know how --</p> <p>16 what letter of the alphabet you describe what</p> <p>17 it looked like, looks like -- looks like.</p> <p>18 But when it was redone, it was</p> <p>19 flattened back out in doing that, and that</p> <p>20 was, again, to consolidate more McDonough and</p> <p>21 Eagle's Landing. But in doing all of that, in</p> <p>22 order to keep the population consistent, the</p> <p>23 numbers consistent with population, there was</p> <p>24 an extra precinct at Locust Grove that was</p> <p>25 also picked up.</p>

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<p style="text-align: right;">199</p> <p>1 Q By 111?</p> <p>2 A By -- by 111. It's the Grove --</p> <p>3 well, I can't remember what it's called. It's</p> <p>4 Grove Park or something like that, but it's on</p> <p>5 the map.</p> <p>6 Q But is it correct that Locust Grove</p> <p>7 is still divided in some way?</p> <p>8 A In some ay, but it never has been</p> <p>9 divided very much. There's another</p> <p>10 representative that has, David Knight, that</p> <p>11 has --</p> <p>12 Q Excuse me.</p> <p>13 A -- the Heron Bay side of Locust</p> <p>14 Grove, which locally is not really considered</p> <p>15 Locust Grove. It's kind of like Eagle's</p> <p>16 Landing. It's its own little world. The city</p> <p>17 of Locust Grove has always been in 111.</p> <p>18 Q Did any -- other than people who on</p> <p>19 the issue of redistricting of those</p> <p>20 neighboring representatives and for the --</p> <p>21 what I think you described as mainly personal</p> <p>22 reasons, at least with regard to some</p> <p>23 changes -- is that correct?</p> <p>24 A Uh-huh (affirmative).</p> <p>25 Q -- did anyone ever tell you during</p>	<p style="text-align: right;">201</p> <p>1 allowed and not allowed, and I don't know what</p> <p>2 her guidelines are. She would be the expert</p> <p>3 on that.</p> <p>4 Q If you were to summarize your goals</p> <p>5 with regard to the changes you would like,</p> <p>6 would have liked to see in your district, what</p> <p>7 would you say your key goals were?</p> <p>8 A Well, I didn't have any goals</p> <p>9 originally. I would have just kept it like it</p> <p>10 was. It would, would have saved us this whole</p> <p>11 discussion now. But if you -- if it was going</p> <p>12 to be revised, my goal would be to have a</p> <p>13 district that when people look at a map, they</p> <p>14 say it makes more sense.</p> <p>15 It has the communities together</p> <p>16 that needed to be together. It, it doesn't</p> <p>17 have districts that are all overlapping on top</p> <p>18 of themselves.</p> <p>19 People look at these maps. I get</p> <p>20 asked that a lot when I go in schools.</p> <p>21 They'll look at the maps and, how is this --</p> <p>22 why does this line go here? This makes no</p> <p>23 sense.</p> <p>24 And so I think we accomplished that</p> <p>25 when -- at least from the -- when you look at</p>
<p style="text-align: right;">200</p> <p>1 the redistricting process before HB 566 was</p> <p>2 passed that any change was unacceptable to</p> <p>3 them personally or, or for any other reason?</p> <p>4 A Other than Ms. Wright who, again,</p> <p>5 was looking at the numbers that she would see</p> <p>6 in Reapportionment, she would be able to tell</p> <p>7 you what your options were in the sense of, I</p> <p>8 couldn't just say, well, put all McDonough</p> <p>9 together and put these precincts because the</p> <p>10 numbers wouldn't add up to be --</p> <p>11 I've always been told that our</p> <p>12 districts are about 75,000 people each. I'm</p> <p>13 not sure if that's even correct. But you try</p> <p>14 to keep around a certain figure. That's</p> <p>15 something I do rely on Reapportionment to tell</p> <p>16 me. And so she would give me what -- if I say</p> <p>17 generally I want to keep McDonough together,</p> <p>18 she would be the one that I would rely on to</p> <p>19 say this is how it could be done.</p> <p>20 And so when I say it was my idea,</p> <p>21 it was never -- I was never able to go in and</p> <p>22 say, these are the precincts I should get.</p> <p>23 She would say these are your options, and then</p> <p>24 we could go from there.</p> <p>25 So she had some idea of what was</p>	<p style="text-align: right;">202</p> <p>1 the 2015 redistricting process, I think we</p> <p>2 have a better-looking map and more</p> <p>3 consolidated map of Henry County now.</p> <p>4 Q Would you say that one of the key</p> <p>5 goals -- well, strike that.</p> <p>6 Did -- was -- I recognize that you</p> <p>7 just said that you didn't have any goals. But</p> <p>8 could -- would you say that in fact one of</p> <p>9 your goals was to improve your chances of</p> <p>10 reelection in 2016?</p> <p>11 A Yes, if it could have been done.</p> <p>12 And that would be if there was a way to pick</p> <p>13 up more historically Republican precincts in</p> <p>14 the county. But, again, when you look at what</p> <p>15 we actually were able to do, that would have</p> <p>16 been an option I could have looked at, but we</p> <p>17 were not able to accomplish that, in my</p> <p>18 opinion.</p> <p>19 And I don't -- I think</p> <p>20 statistically we were not able to accomplish</p> <p>21 that. Though I think and what I've read on</p> <p>22 it, I think in Gwinnett they may have actually</p> <p>23 been able to pick up more Republican areas</p> <p>24 that may have assisted Representative Chandler</p> <p>25 with getting reelected, and I don't know about</p>

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<p style="text-align: right;">203</p> <p>1 the other areas that were affected.</p> <p>2 But that was not really much of an</p> <p>3 option when it comes to Henry County. But</p> <p>4 what I was -- my understanding was --</p> <p>5 Q Excuse me.</p> <p>6 A -- how this would have gotten past</p> <p>7 the Democrat leadership, I don't know, but my</p> <p>8 understanding was we have the ability as the</p> <p>9 majority party to draw lines that could</p> <p>10 actually politically assist the majority</p> <p>11 party, obviously.</p> <p>12 That's one of the things that</p> <p>13 people look at this stuff with sometimes that</p> <p>14 intention. But that was not anything that we</p> <p>15 were able to -- was even a possibility with on</p> <p>16 111.</p> <p>17 Q Would it surprise you that</p> <p>18 Representative Nix testified in this matter</p> <p>19 that the -- your only goal in redistricting</p> <p>20 was to improve your chances of reelection?</p> <p>21 A Yes.</p> <p>22 Q Sorry. I'm just eliminating some</p> <p>23 questions.</p> <p>24 A Okay.</p> <p>25 Q I think we've already covered them.</p>	<p style="text-align: right;">205</p> <p>1 proposed for your district could change the</p> <p>2 number of Democrats, Republicans, and/or</p> <p>3 Independents in your district?</p> <p>4 A Yes.</p> <p>5 Q And do you recall any tables that</p> <p>6 would --</p> <p>7 A I'm sorry. For that last question,</p> <p>8 were you asking me if there were tables that</p> <p>9 showed that?</p> <p>10 Q Tables or other information.</p> <p>11 A Oh, no. I don't -- I don't</p> <p>12 remember any tables. But I remember, again,</p> <p>13 the discussion of Republican versus Democrat</p> <p>14 based on other political races.</p> <p>15 Q Okay.</p> <p>16 A But I don't remember there being a</p> <p>17 table that showed that, but I remember</p> <p>18 discussing that and looking at numbers, but I</p> <p>19 don't remember -- and my, my memory of it is</p> <p>20 it was as simple as a virtual map, similar to</p> <p>21 that map, where you could look by clicking on</p> <p>22 I guess a precinct and see how people voted in</p> <p>23 that precinct.</p> <p>24 That's my memory. But I, again,</p> <p>25 could be mixing that up with when I look at</p>
<p style="text-align: right;">204</p> <p>1 Going back to the meeting that you</p> <p>2 testified about in which Ms. Wright was</p> <p>3 present and maps were shown to you.</p> <p>4 A Yes.</p> <p>5 Q And also I believe you said</p> <p>6 statistical information was shown to you. Is</p> <p>7 that correct? That is -- go ahead.</p> <p>8 A With the other races we'd look at?</p> <p>9 Q Right.</p> <p>10 A The other political races we'd look</p> <p>11 at? Yes.</p> <p>12 Q Yes.</p> <p>13 A Uh-huh (affirmative).</p> <p>14 Q Do you recall seeing any tables of</p> <p>15 information that were associated with that map</p> <p>16 drawing, the maps?</p> <p>17 A What do you mean by "tables"?</p> <p>18 Q Tables of, for example, party</p> <p>19 affiliations and various areas, racial makeup</p> <p>20 of various areas, that sort of information.</p> <p>21 A No. I don't recall seeing that at</p> <p>22 all.</p> <p>23 Q Okay. Do you recall any discussion</p> <p>24 during the meeting as to how the changes that</p> <p>25 were proposed for your district or might be</p>	<p style="text-align: right;">206</p> <p>1 my, my results online with the Secretary of</p> <p>2 State. I know -- well, there's no map there,</p> <p>3 but I know I look precinct by precinct there.</p> <p>4 Q I see.</p> <p>5 A I don't remember any tables at all.</p> <p>6 Q So the Secretary of State's office</p> <p>7 publishes information regarding the voting</p> <p>8 results in each precinct in the county?</p> <p>9 A Yes.</p> <p>10 Q In the -- excuse me.</p> <p>11 A And that's all what's online. And</p> <p>12 Henry County in particular has a county</p> <p>13 website with that where their Board of</p> <p>14 Elections reports it there. And I think it's</p> <p>15 done through the Secretary of State, or you</p> <p>16 could go to it separately there.</p> <p>17 But I've always relied on that</p> <p>18 county site to look at precinct by precinct.</p> <p>19 Q Does -- where a precinct is split</p> <p>20 between two districts, does the Secretary of</p> <p>21 State's data show the voting for each part of</p> <p>22 the precinct? For example, in District 11 --</p> <p>23 111, the precinct is split.</p> <p>24 A Uh-huh (affirmative).</p> <p>25 Q When you see data with regard to</p>

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<p style="text-align: right;">207</p> <p>1 how the precinct voted, can you see the data</p> <p>2 with regard to how your section, 111's</p> <p>3 section, voted, or is it -- is it the entire</p> <p>4 precinct?</p> <p>5 A So, yes and no. So it is not</p> <p>6 divided. But, for example, if I had a</p> <p>7 precinct that was divided, I'll see the</p> <p>8 overall total for a statewide race or a</p> <p>9 countywide race, and then I'll see my total</p> <p>10 which will be less voters. And then I'll see</p> <p>11 the other person who had the other part of the</p> <p>12 precinct, so.</p> <p>13 Q I see.</p> <p>14 A But it would take me going in and</p> <p>15 dividing, do the math myself, I guess. It</p> <p>16 doesn't individually break down the portions.</p> <p>17 Q Are there any sources of data that</p> <p>18 you have with regard to the portion of the</p> <p>19 precinct that is --</p> <p>20 A Not that I'm aware of. And I've</p> <p>21 testified earlier that's one of the challenges</p> <p>22 I have in really looking precinct by precinct</p> <p>23 at how a precinct performs, because I won't</p> <p>24 always know, while I may win a precinct big</p> <p>25 and then a Democrat wins it big, I don't know</p>	<p style="text-align: right;">209</p> <p>1 recall -- oh, sorry. I didn't mean to</p> <p>2 interrupt you.</p> <p>3 A Well, I was thinking there was also</p> <p>4 a Senate race that year. I believe it was the</p> <p>5 year David Perdue ran too, I can't remember,</p> <p>6 maybe one other race we were looking at. But</p> <p>7 that's -- when I say Republican, Democrat,</p> <p>8 what I recall looking at were the other</p> <p>9 political races I've used as a benchmark to</p> <p>10 see how Republicans, Democrats voted in my</p> <p>11 district.</p> <p>12 Q But you recall -- I shouldn't say</p> <p>13 but.</p> <p>14 Do you recall at the meeting that</p> <p>15 you testified to where the maps were</p> <p>16 discussed, do you recall being shown data with</p> <p>17 regard to how changes in your district would</p> <p>18 affect the proportion of black or white voters</p> <p>19 in your district?</p> <p>20 A I don't think so. I just don't</p> <p>21 remember that.</p> <p>22 Q At the meeting, were you shown</p> <p>23 tables or given other information about</p> <p>24 past -- how different parties voted? Strike</p> <p>25 that.</p>
<p style="text-align: right;">208</p> <p>1 how the precinct's actually divided if it's as</p> <p>2 a whole.</p> <p>3 Q And on -- going back to this</p> <p>4 meeting, you said you saw information about</p> <p>5 Democrats and Republicans and Independents; is</p> <p>6 that correct?</p> <p>7 A Yes.</p> <p>8 Q And did you see information as to</p> <p>9 how redistricting, any one or all of the</p> <p>10 components of the redistricting, would change</p> <p>11 the number of black people or the number of</p> <p>12 white people, for example, in a district?</p> <p>13 A Not that I recall. Again, what</p> <p>14 I -- when I say Republicans, Democrats, I'm</p> <p>15 making an assumption that a benchmark</p> <p>16 political race I'm looking at was a partisan</p> <p>17 race.</p> <p>18 Q Right.</p> <p>19 A So that's what I remember looking</p> <p>20 at. And if we're in 2015, I believe that the</p> <p>21 main race I was looking at would be the</p> <p>22 Deal-Carter race. That was the big race. And</p> <p>23 that's -- that was the big governor's race</p> <p>24 2014 in Georgia.</p> <p>25 Q Right. Right. But you don't</p>	<p style="text-align: right;">210</p> <p>1 How -- let me strike that and start</p> <p>2 over.</p> <p>3 At the meeting in which you've</p> <p>4 testified to and which we're discussing, were</p> <p>5 you shown information about past elections</p> <p>6 with regard to breakdowns between parties with</p> <p>7 regard to districts or areas in your, in your</p> <p>8 district?</p> <p>9 A Yes. I remember looking at past</p> <p>10 elections, yes. That's what I was alluding to</p> <p>11 when I said we looked at other races. That's</p> <p>12 what I mean.</p> <p>13 Q Right, right. And the past</p> <p>14 election information you recall seeing, is</p> <p>15 that how different areas voted with regard to</p> <p>16 either being Democratic or Republican or</p> <p>17 Independent?</p> <p>18 A Yes.</p> <p>19 Q And I think from your testimony</p> <p>20 it's fair to say that you do not recall, but</p> <p>21 tell me if I'm wrong, past election</p> <p>22 information broken down by how different</p> <p>23 ethnicities or races voted?</p> <p>24 A No. I don't think there's a way to</p> <p>25 see that, if there is a way to see that. Not</p>

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<p style="text-align: right;">211</p> <p>1 that I know of.</p> <p>2 Q Do you recall someone sitting down</p> <p>3 at a computer and clicking through various</p> <p>4 options that might be used for the</p> <p>5 redistricting?</p> <p>6 A Yes, but what I recall is clicking</p> <p>7 on the map itself. My recollection of the, of</p> <p>8 the program, which I know these other folks</p> <p>9 will know a lot more about, is you're able to</p> <p>10 click on a -- I don't know if it was a</p> <p>11 precinct or how it went, but you were able to</p> <p>12 click on certain areas.</p> <p>13 And you could look and see, I guess</p> <p>14 it was by precinct is all I know, look and see</p> <p>15 how other political races, past elections,</p> <p>16 went in that area. And in doing so, you could</p> <p>17 actually click on that, so yes.</p> <p>18 Q Did you consider moving specific</p> <p>19 streets in or out of your district as opposed</p> <p>20 to the precinct level?</p> <p>21 A The only reason I'm pausing,</p> <p>22 because, if I was dividing any precincts -- I</p> <p>23 can't remember if we had precincts divided. I</p> <p>24 know there were precincts divided to start</p> <p>25 with. But if the population change was going</p>	<p style="text-align: right;">213</p> <p>1 prior to the redistricting in 2015, HB 566,</p> <p>2 that you had -- in your district there were</p> <p>3 two split precincts?</p> <p>4 A I remember two. One of them was in</p> <p>5 Hampton, which is the weird way downtown</p> <p>6 Hampton was divided. The other one was, I</p> <p>7 think, the precinct leading into Stockbridge</p> <p>8 where they had that one narrow strip that led</p> <p>9 into Stockbridge.</p> <p>10 So prior to '15, I at least</p> <p>11 remember those two. If there were more, I</p> <p>12 don't remember off the top of my head.</p> <p>13 Q Do you recall that as a result of</p> <p>14 HB 566, you had more precincts that were split</p> <p>15 as a result of the map that was drawn as in</p> <p>16 2015?</p> <p>17 A I don't know, but I do know that</p> <p>18 we -- those two that were split were</p> <p>19 completely removed. So I don't know if we</p> <p>20 split it -- let me think back at my last</p> <p>21 election.</p> <p>22 Mt. Carmel precinct wasn't</p> <p>23 previously split and was then split, so there</p> <p>24 was one. And there's a precinct somewhere in</p> <p>25 McDonough. Oh, I'm wrong. McDonough Central</p>
<p style="text-align: right;">212</p> <p>1 to be too much to where a precinct still had</p> <p>2 to be divided -- I don't remember ever looking</p> <p>3 at a particular street, though.</p> <p>4 No. It was precinct based because</p> <p>5 I remember the discussion in particular about</p> <p>6 McDonough Central, but it was street based,</p> <p>7 based on Representative Rutledge and where he</p> <p>8 wanted to live. It was a particular side of</p> <p>9 the road, so yes in that sense.</p> <p>10 Q Sorry. I didn't mean to laugh.</p> <p>11 A Have you deposed him yet?</p> <p>12 Q No, we have not.</p> <p>13 A Okay. You'll have to ask him about</p> <p>14 that.</p> <p>15 Q We have not.</p> <p>16 A He did buy a house there recently.</p> <p>17 He was right. I didn't believe him at the</p> <p>18 time.</p> <p>19 Q We may ask him questions such as do</p> <p>20 you -- would it surprise you to say that</p> <p>21 Representative or Senator Strickland</p> <p>22 testified -- I'm teasing.</p> <p>23 A Tell him I was angry about it. I'm</p> <p>24 just kidding.</p> <p>25 Q Now, you -- do you recall that</p>	<p style="text-align: right;">214</p> <p>1 was always split, remained split, the one over</p> <p>2 the square. I didn't count that as -- there</p> <p>3 was three originally I remember being split.</p> <p>4 It stayed split, though it was less split.</p> <p>5 There was a new precinct</p> <p>6 northern -- further north in Hampton that made</p> <p>7 John Yates, that district, go further and have</p> <p>8 that whole panhandle area. To do that</p> <p>9 required another split of a precinct in</p> <p>10 Hampton, so we lost a split but gained a</p> <p>11 split, so now we're even on splits.</p> <p>12 And there was one out east of</p> <p>13 McDonough somewhere, I think, that was split</p> <p>14 still.</p> <p>15 Q Do you recall --</p> <p>16 A Or east Locust Grove. I can't</p> <p>17 remember.</p> <p>18 Q I'm sorry. Did I interrupt? I</p> <p>19 didn't mean to.</p> <p>20 A No. That's all I remember. I'm</p> <p>21 just trying to think through. And I'm</p> <p>22 thinking out loud, which is dangerous on the</p> <p>23 record, I guess.</p> <p>24 Q Do you recall, does it ring a bell</p> <p>25 if I were to tell you that five precincts were</p>

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<p style="text-align: right;">215</p> <p>1 split after the redistricting --</p> <p>2 A You may have looked at it --</p> <p>3 Q -- in 2005 --</p> <p>4 A -- and told me that. I don't</p> <p>5 remember the --</p> <p>6 Q -- 2015?</p> <p>7 A Five. I remember the two -- the</p> <p>8 three. I remember three off the top of my</p> <p>9 head, and there were previously three. So</p> <p>10 there may have been two additional splits</p> <p>11 after the '15, if that's what you're saying,</p> <p>12 but I don't remember.</p> <p>13 Q And I think you said that you did</p> <p>14 not take notes at the meeting that we've been</p> <p>15 discussing?</p> <p>16 A There were no notes.</p> <p>17 Q Do you recall anyone sending a</p> <p>18 follow-up email regarding the meeting?</p> <p>19 A No, but I know we didn't because I</p> <p>20 check my emails. One of the things I checked</p> <p>21 in particular is to see if I had any</p> <p>22 correspondence with Ms. Wright to see if we</p> <p>23 ever discussed it, and I checked that on my</p> <p>24 personal. I know my House email was already</p> <p>25 checked.</p>	<p style="text-align: right;">217</p> <p>1 Reapportionment Office meeting issue --</p> <p>2 A Yeah.</p> <p>3 Q -- or question. And I know -- I</p> <p>4 think I've said this before, but I just wanted</p> <p>5 to make sure that I'm understanding.</p> <p>6 You don't have any -- you think you</p> <p>7 may have met with the Reapportionment Office</p> <p>8 more than once. Is that --</p> <p>9 A Yes.</p> <p>10 Q -- fair?</p> <p>11 A Yes.</p> <p>12 Q Do you have any specific</p> <p>13 recollection of any other -- or any</p> <p>14 recollection of any other specific meeting?</p> <p>15 A About redistricting or --</p> <p>16 Q About redistricting.</p> <p>17 A -- any of this?</p> <p>18 Q About redistricting.</p> <p>19 A No, no.</p> <p>20 Q During the redistricting process</p> <p>21 for 111 in 2015, were there -- was one of your</p> <p>22 considerations that you wanted to make sure</p> <p>23 that neighboring Republican districts were not</p> <p>24 made significantly more Democratic by any</p> <p>25 proposed changes --</p>
<p style="text-align: right;">216</p> <p>1 But I made an additional search</p> <p>2 myself for this deposition beyond what my IT</p> <p>3 people did to make sure there wasn't anything</p> <p>4 because I just didn't remember it, and there</p> <p>5 was nothing there.</p> <p>6 Q Whether or not your emails preserve</p> <p>7 it or your documents preserve it --</p> <p>8 A Yeah.</p> <p>9 Q -- do you recall any memorandum or</p> <p>10 summary of the meeting being distributed?</p> <p>11 A I don't recall it. I remember</p> <p>12 going to the office, and I remember going -- I</p> <p>13 believe there was more than one meeting.</p> <p>14 Again, it goes back to the Mr. Rutledge thing.</p> <p>15 But I -- the difference in being in the</p> <p>16 legislature versus practicing law, practicing</p> <p>17 law, everything is very structured. You have</p> <p>18 your calendar. People schedule meetings.</p> <p>19 One thing I've learned being at the</p> <p>20 State Capitol is everything happens on the</p> <p>21 fly. Suddenly, there's a meeting you didn't</p> <p>22 plan for. And so it's less structured, and so</p> <p>23 I'm not surprised there's no emails or no</p> <p>24 calendar entries dealing with it.</p> <p>25 Q Now, I just want to wrap up the</p>	<p style="text-align: right;">218</p> <p>1 A Yes.</p> <p>2 Q -- to your district? And was any</p> <p>3 purpose -- and I think I know the answer to</p> <p>4 this, but I have to ask the question. Was</p> <p>5 there any purpose in regard to changing the</p> <p>6 racial demographics of your district?</p> <p>7 A No.</p> <p>8 Q Were you concerned about the racial</p> <p>9 demographics of any other district?</p> <p>10 A No.</p> <p>11 Q So, for example, did you want to</p> <p>12 avoid changing the racial demographics of</p> <p>13 Representative Efration's district, which I</p> <p>14 understand were heavily white?</p> <p>15 A You've got to -- that's the</p> <p>16 Gwinnett county seat.</p> <p>17 Q Yeah.</p> <p>18 A I wasn't --</p> <p>19 Q I'm sorry.</p> <p>20 A You're talking about the Gwinnett</p> <p>21 County. That's Representative Chandler's</p> <p>22 neighbor.</p> <p>23 Q Okay. That's right. That's right.</p> <p>24 A But as far as my neighbors --</p> <p>25 Q With any --</p>

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<p style="text-align: right;">219</p> <p>1 A -- there was never any discussions 2 about race or changes. 3 Q Okay. 4 A There was discussion -- again, 5 initially with this process, you have the 6 opportunity as the majority party to 7 strengthen numbers, and your political 8 numbers. So we did look at other political 9 contests in the past and look at changes you 10 can make that would actually strengthen 11 Republican seats around me, including my seat. 12 But, again, numbers will be what 13 they are, but there was not really a way to do 14 that in Henry County. And so I don't recall 15 any discussions about race involved in any of 16 that though. 17 Q Do you believe that any changes to 18 your district resulted in more favorable -- a 19 more favorable political situation for any of 20 the districts surrounding it, more favorable 21 to Republicans, that is? 22 A Yes. I think in hindsight after 23 the 2016 election, my election was slightly 24 closer in 2016 than it was in '14. And part 25 of it was the new McDonough area that I wanted</p>	<p style="text-align: right;">221</p> <p>1 the 2014, but I can't remember the '12, 2 honestly. I think it was very similar to '12, 3 but I feel like it was a little bit closer 4 than '12. 5 Q So in 2014, you won reelection? 6 A With a larger number. 7 Q Do you recall the margin at that 8 point? 9 A It was -- I know it was over -- I 10 was over 53 percent. It wasn't 52-point 11 something. It was a larger margin. 12 Q And then in 2016, your margin was 13 slightly less? 14 A That's correct. 15 Q Was it your view that if the 16 changes had not been made, the 2015 changes 17 had not been made, that you would have fared 18 worse in terms of percentage of margin of 19 victory in 2016 than you had fared in 2014? 20 A I think -- no one will ever the 21 answer, but I think I actually could have done 22 a little bit better in hindsight. And nobody 23 else may agree with this, but I think the 24 changes in '15 actually made my race a little 25 bit tighter in '16.</p>
<p style="text-align: right;">220</p> <p>1 to be all in one district that came from 2 Representative Welch's district actually was 3 pretty heavily Democrat when you look at the 4 Trump-Hillary numbers. 5 Now, I still did pretty well there, 6 but the national politics affects me, 7 obviously. And so that's why I look at other 8 races, because if I don't go knock on a door, 9 they may just think I'm just like all the 10 other Republicans or all the other Democrats. 11 You know, it depends on who you are. 12 And so in hindsight, I think that 13 the changes in '15 actually probably -- I'm 14 not sure if there's something that offset this 15 for Representative Welch's district, but I 16 think it could have actually benefited his and 17 hurt the 111 politically. 18 Q Looking at the -- I recognize you 19 just said that you -- well, let me back -- ask 20 the question. 21 Did -- was your margin of victory 22 in 2016 less than it had been in previous 23 elections? 24 A I believe it was, but I can't 25 remember how -- I know it was different from</p>	<p style="text-align: right;">222</p> <p>1 Q Why -- how did you come to that 2 conclusion, or how do you come to that 3 conclusion? 4 A It's -- it's based on the -- a big 5 new precinct I picked up in McDonough that was 6 a Democrat precinct. And I say Democrat 7 precinct. I'm putting it in a box, but I'm 8 comparing that to the presidential race. It 9 was a heavy Hillary Clinton turnout precinct, 10 but it was new in the 111. 11 Q I see. 12 A And while I did decent with Hillary 13 voters, well enough to get reelected, I think 14 that probably hurt me a little bit. 15 Q And did you -- did your opponent 16 win that precinct? 17 A Yes, not as much as Hillary won it, 18 but yes. I believe he -- I believe he did. 19 If I'm wrong, the numbers will show, but I'm 20 almost positive he did. Because I -- if my 21 memory's correct, Trump lost by ten points. 22 And I want to say I lost my four or five, if 23 my memory's correct, but I may be wrong. 24 That was a sore point for me. This 25 was a new area I picked up, and I thought that</p>

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<p style="text-align: right;">223</p> <p>1 the changes actually probably hurt me because 2 the people there had -- I was new to them. 3 Q Were there any changes that you 4 made where you picked up areas or, or changed 5 the areas so that you did not have the areas 6 that you previously had? Were there any 7 particular changes that you felt benefited 8 you? 9 A Maybe you could argue the rest of 10 McDonough that I did -- the McDonough Central 11 precinct I picked up more of just because I 12 know more people there because I work right 13 there in the square area and now I live in the 14 square area. 15 And in the meantime, I moved to 16 that area in between the two elections, and so 17 I think that that did probably help me 18 politically. 19 Q Any other changes that you felt 20 helped you politically in the 2016 race? 21 A Maybe you could argue the Eagle's 22 Landing pickup. Eagle's Landing is actually a 23 very Democrat area. But, also, I'm a member, 24 well, became a member in the meantime. 25 Because of the changes, I got more involved</p>	<p style="text-align: right;">225</p> <p>1 talking about, what do you mean? 2 A Well, I mean simply, it looks like 3 it comes from the Henry County website that I 4 look at after each election. 5 Q And was this -- so you recognize 6 this document or at least the format? 7 A At least -- I believe this is how, 8 if you click on each precinct, and if you did 9 this -- well, let's look at the bottom. 10 Well, I did not go -- this looks 11 familiar in the sense of you can go precinct 12 by precinct on the Henry County website and 13 look at precincts and how they vote, so that's 14 why I say I recognize it. I'm not sure if 15 that's where this came from or not, but. 16 Q So, for example, if you look at the 17 fourth page of Exhibit 36, which is -- I'm 18 sorry. 19 Is it correct that the first five 20 pages refer to precincts that were in Henry 21 County as of November of 2014, or at least 22 part of them were in Henry County? 23 A Yes. That appears to be the case. 24 And the last two pages look to be Gwinnett 25 County.</p>
<p style="text-align: right;">224</p> <p>1 there, became a member of that country club. 2 And I think that I was able to 3 probably pick up some more votes there, and 4 that would be more crossover votes, if you 5 will, people that vote Democrat that voted for 6 me because they knew me. 7 I'm speculating on all this, but 8 those are two, two places I think I probably 9 benefited. 10 Q Okay. I'd like to show you -- 11 MR. KHOURY: I was just looking to 12 see if we had coffee so I don't pull a 13 Representative Yates on us in here. 14 THE WITNESS: I feel so bad talking 15 about him. He was a great guy. It was just a 16 boring meeting. 17 MR. PHILLIPS: Remind me to tell 18 you an anecdote when we go off the record. 19 (Whereupon a document was identified as 20 Plaintiff's Exhibit 36.) 21 Q I'm going to show you a document 22 that's been previously marked as Exhibit 36. 23 A Here are those results that I was 24 talking about. 25 Q When you say those results you were</p>	<p style="text-align: right;">226</p> <p>1 Q Which does not border on your -- 2 A Right. 3 Q -- precinct, correct, or -- yeah. 4 A Correct. 5 Q Now, if you look at page -- this is 6 the fourth page. If you look at the fourth 7 page of the document, would it be fair to say 8 that, based on reviewing this document or your 9 knowledge generally, that of the precincts in 10 Henry County you did most poorly, or you did 11 less well, in Stockbridge West than you did in 12 other precincts? That is, you received fewer 13 votes. 14 A Looks like I received the fewest 15 votes in Stockbridge West. 16 Q Is the Stockbridge West in the 17 northern portion of your district? 18 A We need to look at the map, but my 19 recollection is that is the arm, if you will, 20 I keep referring to, I think that was a split 21 precinct that got you to the Stagecoach 22 precinct, which is that one of the top that I 23 said made no sense. 24 This is the area that cuts around 25 the Eagle's Landing Country Club and cuts</p>

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<p style="text-align: right;">227</p> <p>1 around the 75 corridor there to get to the 2 Stagecoach precinct. When you look at a map, 3 it looks like it's just the vehicle to get to 4 another precinct. 5 Q And was Stagecoach West removed 6 from District 111 as a result of the 2015 7 redistricting? 8 A Stagecoach was. And I believe -- 9 Q I'm sorry. Excuse me. I misspoke. 10 A Yeah, but I want to answer your 11 question too. 12 Q Okay. 13 A I believe Stockbridge West was as 14 well, but they both -- it was that entire -- 15 my recollection is that is an arm in itself. 16 The weird little top part of the 111 before 17 '15, both of those were taken off when it was 18 flattened out. 19 Q Do you know what the racial 20 demographics of Stockbridge West are? 21 A No. 22 Q And do you know what the racial 23 demographics of the precinct you also 24 mentioned in your last response, Stagecoach, 25 were?</p>	<p style="text-align: right;">229</p> <p>1 A It must have been if these are Dale 2 Rutledge's results. 3 Q And do you know, having -- do you 4 know what the racial demographics of those 5 districts are? 6 A I don't, but I do know that Flippen 7 is the Eagle's Landing precinct that has 8 that -- the whole country club in it. As a 9 member of the country club, my wife's actually 10 the chair of the membership board, we're a 11 very diverse club. 12 I don't know our breakdown, but we 13 are a good melting pot of young professionals, 14 so I don't -- it's diverse. I know that. 15 Q And then on the third page of the 16 exhibit you see the name, and I'm probably 17 going to murder this, Tussahaw. Is that at 18 the top of that table? 19 A Yes. 20 Q And was that precinct within 21 District 110 at the time of the 2014 election? 22 A It appears it is if -- because this 23 is Andy Welch versus Kaye Shipley, and that 24 was the race for 110 in 2014. 25 Q Do you ever -- do you recall ever</p>
<p style="text-align: right;">228</p> <p>1 A No. But I can tell you, knocking 2 on doors, Stockbridge West was a lot of newer 3 homes, people that commute in and out to 4 Atlanta to every day. It was honestly a 5 different type of voter than Stagecoach, which 6 is right above of it, which was an old -- more 7 older population. 8 Very young population, very well 9 educated in Stockbridge West versus 10 Stagecoach. Not saying they're uneducated, 11 but it's just an older population that's been 12 there forever versus new people that moved in, 13 young people that had moved in. 14 Q But you wouldn't characterize each 15 as predominantly a black community or 16 predominantly white community? 17 A I don't know. It's very diverse. 18 When I knocked on doors, I saw white and black 19 and other races too. 20 Q If you could look at the second 21 page of Exhibit 36. 22 A Yes. 23 Q Do you recall -- well, where the 24 Flippen and Hickory Flat precincts in 25 District 109 at the time of the 2014 election?</p>	<p style="text-align: right;">230</p> <p>1 knowing or discussing the racial demographics 2 of that precinct? 3 A I don't. To be on honest with you, 4 I don't know where that is now. I believe 5 that that was one of those split precincts, 6 and so I don't remember spending much time 7 campaigning there because there are very few 8 voters there that I recall. 9 Q Very few Republicans or just 10 generally very few voters? 11 A Just general voters that I recall 12 in my last election, because I remember that 13 being a precinct that to this day I still 14 can't tell you where it is. I think it's in 15 my Senate district. I should know that. 16 Q Were there changes that were 17 proposed to the 2012 map in preparation for 18 HB 566 that you rejected as the representative 19 of District 111? 20 A Not that I recall. I mean, again, 21 the conversation I remember having was pretty 22 to the point of, I don't know who had the 23 original proposal, but the idea that I 24 discussed previously about the communities. 25 And I remember the discussion about McDonough</p>

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<p style="text-align: right;">231</p> <p>1 in particular, the square, as we've gone over 2 before. 3 But I don't remember there being 4 something I proposed that will -- that someone 5 else proposed that I rejected. That was your 6 question. I don't remember that ever coming 7 up. 8 Q Did you ever request that a map be 9 drawn which -- where the number of Republicans 10 in your district increased? 11 A Yes, but I -- what I remember is 12 the initial conversation. The first thing we 13 discussed was politics and looking at whether 14 or not we could keep strong Republican base 15 seats in Henry County, looking at all these 16 seats put together, so I do remember that 17 conversation. 18 Now, whether that -- whether there 19 was ever actually a map that I could come up 20 with that would do that, no, I don't ever 21 remember seeing anything that would actually 22 do that. 23 Q Did you ever -- let's set aside 24 your district for a moment. 25 A Okay.</p>	<p style="text-align: right;">233</p> <p>1 basis for disagreeing is the fact that the new 2 area that I picked up was very diverse. And 3 so I don't have any statistics to say one way 4 or another, but I -- that's the only reason I 5 can say I disagree with that, but I don't 6 know. 7 Q Do you know whether the number of 8 white voters was increased by any changes that 9 were made to -- 10 A I don't. 11 Q -- District 111? 12 A And it's the same answer. I would 13 think no, but I don't know what the actual 14 numbers were. I didn't see that on the 15 ground. 16 Q And I'm not sure that we 17 discussed -- I think you told me that 18 Stockbridge West was moved into House District 19 109 -- 20 A I believe that's -- 21 Q -- in 2015? 22 A I believe that's right because 23 that's, again, that's the arm that gets to 24 Stagecoach. 25 Q Do you recall why it was decided to</p>
<p style="text-align: right;">232</p> <p>1 Q And ask you whether you ever heard 2 other members of the legislature requesting 3 information regarding the racial demographics 4 of their district or of any district. 5 A No. I don't remember that coming 6 up. 7 Q And did you ever see any maps with 8 regard to -- which broke down precincts or 9 districts by race? 10 A Not that I recall, huh-uh. 11 Q And I take it you did not ask for 12 any such map for your district? 13 A No. 14 Q Excuse me. Do you recall that the 15 changes, the sum total of the changes that 16 were made to District 111 as a result of HB 17 566, decreased the number of African-Americans 18 in your district, voters that is, by 19 approximately 2.5 percent? 20 A I don't recall that. 21 Q Do you have any -- do you think 22 that's wrong? 23 A I don't know. I actually do -- I 24 disagree with that number, but I'm not sure 25 how good my basis is for disagreeing. My</p>	<p style="text-align: right;">234</p> <p>1 move that portion of Stockbridge West into 2 District 109? 3 A Yes, I remember that specifically. 4 Because that takes, when you look at the maps, 5 it makes 109 cover that whole Stockbridge 6 region, Stockbridge all the way to the east, 7 and gets it out of going around the country 8 club and put 111 into the club south. 9 Q Do you know what the -- in terms of 10 votes for Republicans versus Democrats, do you 11 know what the effect of moving Stockbridge 12 West out of your district and into another 13 district was on your district? 14 A I don't know. I would say it 15 probably broke even because Stagecoach was a 16 historically Republican precinct that also 17 went away with that, and Stockbridge West was 18 historically a Democrat precinct. And when I 19 say Republican and Democrat, I'm basing that 20 on other benchmark political races, making 21 assumptions. 22 I don't believe I previously ever 23 won Stockbridge West, so I always won 24 Stagecoach. And so I gave up a reliable 25 precinct there when I gave up Stagecoach.</p>

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<p style="text-align: right;">235</p> <p>1 Q Between, as opposed -- if you</p> <p>2 compare Stockbridge West and Stagecoach, do</p> <p>3 you have an understanding as to the racial</p> <p>4 demographics of each of those precincts?</p> <p>5 A I don't. Again, Stockbridge West</p> <p>6 is more of a younger professional crowd.</p> <p>7 That's just my opinion, what I've seen. And</p> <p>8 Stagecoach is your older, more senior folks</p> <p>9 that have lived in that area forever.</p> <p>10 And when you drive around and you</p> <p>11 knock on doors there, you have to walk up long</p> <p>12 driveways with dogs versus Stockbridge West</p> <p>13 where I can go into neighborhoods that are</p> <p>14 more like townhomes. It's just more --</p> <p>15 honestly, some voters that I associate more</p> <p>16 with as a young professional.</p> <p>17 Q So the combination of moving</p> <p>18 Stockbridge West and Stagecoach into 109, you</p> <p>19 believe that's sort of a wash, that it didn't</p> <p>20 really have any impact on your electoral</p> <p>21 success?</p> <p>22 A Yes. I mean, we could do numbers</p> <p>23 and look and compare the -- my 2014 numbers</p> <p>24 there in those precincts, but that's just my</p> <p>25 opinion of it.</p>	<p style="text-align: right;">237</p> <p>1 two precincts moving out, all other things</p> <p>2 being equal, that movement out would benefit</p> <p>3 you; is that correct?</p> <p>4 A It's just hard to say that because</p> <p>5 I still lost -- if you look at it that way, I</p> <p>6 lost 681 plus 265 voters total right there. I</p> <p>7 lost that many votes. So I don't know, and I</p> <p>8 don't know how Jim Nichols -- Jim's a friend</p> <p>9 of mine. He actually endorsed me this last</p> <p>10 year when I ran.</p> <p>11 But I don't know how he compares to</p> <p>12 other candidates either, whether or not that's</p> <p>13 fair to say that my '16 opponent would have</p> <p>14 done the same thing there. Jim I think</p> <p>15 lives -- he does not live in Stockbridge West</p> <p>16 because he's still in 111, but he lives in</p> <p>17 that area too which probably gave him some</p> <p>18 advantage.</p> <p>19 He actually worked really hard,</p> <p>20 knocked on doors. We came friends again after</p> <p>21 the election, so that may have been part of</p> <p>22 the reason he performed so well there. I</p> <p>23 don't know how it looked in '12. We could</p> <p>24 look back and see and compare.</p> <p>25 Q And I don't think we've talked much</p>
<p style="text-align: right;">236</p> <p>1 Q I mean, if you'd like to, you said</p> <p>2 we can look at numbers, I'm happy to have you</p> <p>3 do that if you, if you think that would be</p> <p>4 helpful.</p> <p>5 A Well, if you look at the numbers,</p> <p>6 then it would be Jim Nichols did really well</p> <p>7 in Stockbridge West versus Stagecoach, where I</p> <p>8 did well compared to him and not very well</p> <p>9 compared to him. So I guess you could argue</p> <p>10 there's more Democrats, more Democrats total</p> <p>11 in those two put together than are</p> <p>12 Republicans.</p> <p>13 Q So --</p> <p>14 A If you assumed Democrats voted for</p> <p>15 him, Republicans vote for me. Our voters, he</p> <p>16 did better overall in that entire area than I</p> <p>17 did if you put the two together.</p> <p>18 Q So is it correct that moving those</p> <p>19 two precincts out of your district would have</p> <p>20 benefited you; correct?</p> <p>21 A Depends on what I picked up in</p> <p>22 exchange for it.</p> <p>23 Q But I mean -- no, I understand.</p> <p>24 A Yeah.</p> <p>25 Q But in terms of the effect of those</p>	<p style="text-align: right;">238</p> <p>1 about the Flippen precinct before.</p> <p>2 A Yeah.</p> <p>3 Q Did, did -- was the result of</p> <p>4 the -- of HB 566 that the Flippen precinct was</p> <p>5 split, that is, that it had previously been</p> <p>6 part of District 109 and after the HB 566 was</p> <p>7 passed a portion of the Flippen precinct went</p> <p>8 into House District 111?</p> <p>9 A I don't know how much of it did,</p> <p>10 but that was the Eagle's Landing community.</p> <p>11 Q I see.</p> <p>12 A That's what that pickup is.</p> <p>13 Q Okay.</p> <p>14 A So that's why it looks like a</p> <p>15 split. It's not on the ground. It's -- you</p> <p>16 have a particular community right there. I've</p> <p>17 actually thought all of Flippen went to 111.</p> <p>18 I may be wrong. Maybe that is a split</p> <p>19 precinct. But the part -- Highway 42 divides</p> <p>20 it.</p> <p>21 Everything west of 42 was put into</p> <p>22 111. That's all a particular community there,</p> <p>23 Eagle's Landing. It has several neighborhoods</p> <p>24 in it, which is very diverse when you look at</p> <p>25 race. That's one of the most diverse areas</p>

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<p style="text-align: right;">239</p> <p>1 you'll see in our county in my opinion.</p> <p>2 Q Would you characterize that county</p> <p>3 in any way economically? Upper middle class,</p> <p>4 middle class, et cetera?</p> <p>5 A It's a great mix because you have</p> <p>6 starter home communities that are called</p> <p>7 Eagle's Landing communities and you have</p> <p>8 million-dollar homes mixed in. It's a true</p> <p>9 mix, which is kind of rare to see houses like</p> <p>10 that next to each other.</p> <p>11 Q Did you think the change in the</p> <p>12 Flippen precinct benefited you ultimately in</p> <p>13 terms of political results?</p> <p>14 A But it wouldn't have benefit --</p> <p>15 yes, but not anybody else. It benefited me</p> <p>16 because of the fact that after that happened I</p> <p>17 got more engaged in that country club. The</p> <p>18 club country has struggled a little bit. It's</p> <p>19 had some issues in the past, and they</p> <p>20 needed -- and the issues have been young</p> <p>21 people aren't joining country clubs like they</p> <p>22 used to.</p> <p>23 And a lot of the growth in Henry</p> <p>24 County went further south, and so my wife and</p> <p>25 I decided when we got married to get involved</p>	<p style="text-align: right;">241</p> <p>1 Q Just for the sake of clarity, why</p> <p>2 don't we look at that map.</p> <p>3 I'm showing you first Exhibit 5.</p> <p>4 A Uh-huh (affirmative).</p> <p>5 Q Which is Henry County House</p> <p>6 Districts - as of 2012.</p> <p>7 A Okay.</p> <p>8 Q And then Exhibit --</p> <p>9 A I can answer it based on this.</p> <p>10 Q Can you?</p> <p>11 A Yeah.</p> <p>12 Q Okay.</p> <p>13 A That answers my question. So</p> <p>14 Flippen, the Eagle's Landing community is all</p> <p>15 off Eagle's Landing Parkway through here.</p> <p>16 This is the -- this is the actual club itself.</p> <p>17 And all these neighborhoods surrounding,</p> <p>18 they're all part of that community.</p> <p>19 Highway 42 is a major divide here.</p> <p>20 There are Eagle's Landing neighborhoods that</p> <p>21 go off on the east side of 42 into Hickory</p> <p>22 Flat. And so if, if this -- and this is</p> <p>23 divided, not -- it does not go all the way</p> <p>24 over here. This is a whole different area</p> <p>25 compared to this area as far as the community.</p>
<p style="text-align: right;">240</p> <p>1 there socially and met a lot of folks. And so</p> <p>2 it did politically benefit me, in my opinion,</p> <p>3 because we made a lot of friends in there.</p> <p>4 Q Is Flippen -- I'm sorry. Is the</p> <p>5 country club you referenced, is that a private</p> <p>6 club?</p> <p>7 A Yes. It's part of Club Corp. It's</p> <p>8 a private club. But when I say Eagle's</p> <p>9 Landing, I'm not just referring to the club.</p> <p>10 Again, Eagle's Landing is the entire group of</p> <p>11 neighborhoods, and I have a law office there</p> <p>12 too.</p> <p>13 Q Do you recall that the Hickory Flat</p> <p>14 district, which is on the same page --</p> <p>15 A Yeah.</p> <p>16 Q -- was split as a result of the</p> <p>17 changes in -- that were the result of HB 566?</p> <p>18 A I don't remember where Hickory Flat</p> <p>19 is. I honestly need to look at the map to</p> <p>20 tell you. I don't remember. I feel like</p> <p>21 that's right in that same area, but I can't</p> <p>22 remember if that's part of -- or if that was</p> <p>23 picking up one more Eagle's Landing</p> <p>24 neighborhood or what that was doing, if it was</p> <p>25 split.</p>	<p style="text-align: right;">242</p> <p>1 So what was, what was picked up, if</p> <p>2 you will, with the change would have been</p> <p>3 drawing this whole Eagle's Landing area in.</p> <p>4 And then another note is Stockbridge has</p> <p>5 incorporated some of these neighborhoods in,</p> <p>6 as you see. That's what this area is here.</p> <p>7 And so that also kept 111 having</p> <p>8 another vote when it comes to Stockbridge,</p> <p>9 which from a political standpoint is important</p> <p>10 because you have 109 that's one person that</p> <p>11 has city of Stockbridge, 111 has a little bit</p> <p>12 of Stockbridge, and then you have Democrats</p> <p>13 with the rest.</p> <p>14 And so it kept it politically</p> <p>15 diverse and Republicans having a say in what</p> <p>16 happens in Stockbridge while still a minority</p> <p>17 say, but of having a say there too.</p> <p>18 Q So this map of 2012, looking at</p> <p>19 this, you're -- you can recollect what</p> <p>20 happened in 2015?</p> <p>21 A Yes. I know based on, based on</p> <p>22 just the communities alone.</p> <p>23 Q Based on -- okay.</p> <p>24 A Yeah.</p> <p>25 Q Okay. And I'm sorry. Did we</p>

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<p style="text-align: right;">243</p> <p>1 also -- I think you wanted to look at the --</p> <p>2 one of the reasons you wanted to ask to look</p> <p>3 at that or suggested we look at that was --</p> <p>4 strike that.</p> <p>5 I think I suggested we look at it</p> <p>6 when you mentioned it.</p> <p>7 A Doesn't look like Stockbridge West</p> <p>8 was ever split, by the way. I guess I had the</p> <p>9 whole thing. I was wrong on that.</p> <p>10 Q What about the Hickory Flat</p> <p>11 precinct?</p> <p>12 A That's what we just discussed. It</p> <p>13 was split --</p> <p>14 Q Okay. That's right. I'm sorry.</p> <p>15 A -- to get all of Eagle's Landing.</p> <p>16 Q Right, right. Okay. Okay.</p> <p>17 A Want me to leave this out?</p> <p>18 Q I think we may be able to --</p> <p>19 A Okay.</p> <p>20 Q I'm not absolutely sure, frankly.</p> <p>21 THE VIDEOGRAPHER: Mr. Phillips,</p> <p>22 can you put on your my microphone back on?</p> <p>23 MR. PHILLIPS: Oh. Thank you.</p> <p>24 Were you able to get my --</p> <p>25 THE VIDEOGRAPHER: Yes. I turned</p>	<p style="text-align: right;">245</p> <p>1 of which bears Bates number GA2-000682, it's a</p> <p>2 multipage document, it appears to be an email</p> <p>3 from -- an email string, the top email of</p> <p>4 which is from Mr. O'Connor, Dan O'Connor, to</p> <p>5 Chris Kelleher.</p> <p>6 And it's regarding House District</p> <p>7 80 with two attachments, one regarding House</p> <p>8 12 Re-2014 Voting Data HD 48 and then another</p> <p>9 attachment, House-amdsup-2015-PACKET-pdf.</p> <p>10 Do you see this, sir?</p> <p>11 A Yes. I've never seen it before,</p> <p>12 but I've not --</p> <p>13 Q You have not -- I'm sorry.</p> <p>14 A Not that I recall.</p> <p>15 Q Okay. If you could look at the</p> <p>16 first attachment, which is at page -- the</p> <p>17 fourth page of the email. And this is a chart</p> <p>18 of House District 48; is that correct?</p> <p>19 A It appears to be.</p> <p>20 Q And then there is a map which has</p> <p>21 Proposed Georgia House Districts. Do you see</p> <p>22 that on the fifth page?</p> <p>23 A Yes, appears to be.</p> <p>24 Q If you could flip with me to the</p> <p>25 tenth page of the document?</p>
<p style="text-align: right;">244</p> <p>1 you up. And there's six minutes left.</p> <p>2 MR. PHILLIPS: I'm skipping</p> <p>3 questions. I apologize for the delay, but --</p> <p>4 THE WITNESS: Okay. That's fine.</p> <p>5 MR. PHILLIPS: -- I think it will</p> <p>6 ultimately benefit where we've already</p> <p>7 discussed them.</p> <p>8 Okay. So, actually, since I'm</p> <p>9 about to move onto another document, why don't</p> <p>10 we just pause here for a few minutes.</p> <p>11 MR. KHOURY: Okay.</p> <p>12 THE WITNESS: Okay.</p> <p>13 THE VIDEOGRAPHER: Going off the</p> <p>14 video record at 2:33 p.m.</p> <p>15 (Proceedings in recess, 2:33 p.m. to</p> <p>16 2:45 p.m.)</p> <p>17 THE VIDEOGRAPHER: We're back on</p> <p>18 the video record. This is the beginning of</p> <p>19 video file number four. The time is 2:45 p.m.</p> <p>20 (Whereupon a document was identified as</p> <p>21 Plaintiff's Exhibit 284.)</p> <p>22 Q Senator Strickland, I'm going to</p> <p>23 give you a document that I've marked for</p> <p>24 identification as Exhibit 284.</p> <p>25 And this document, the first page</p>	<p style="text-align: right;">246</p> <p>1 A Was this the fifth page with the</p> <p>2 map? Is that what you said? I'm just trying</p> <p>3 to get my bearings.</p> <p>4 Q That's my understanding, yes.</p> <p>5 A Okay. Six.</p> <p>6 Q So the page I wanted to look at</p> <p>7 is the page with the 000691.</p> <p>8 A Okay.</p> <p>9 Q You see that?</p> <p>10 A I'm there.</p> <p>11 Q And then have you ever seen this</p> <p>12 table before?</p> <p>13 A I don't believe so.</p> <p>14 Q Have you ever seen any similar</p> <p>15 table?</p> <p>16 A Not that I recall. I don't quite</p> <p>17 know how to read this either. But, no, not</p> <p>18 that I recall.</p> <p>19 Q Okay. If you move down -- you see</p> <p>20 on the left-hand side, there's the word at the</p> <p>21 top, there's the column heading District?</p> <p>22 A Yes, and I see 111 on here.</p> <p>23 Q Right. And 111 has -- appears to</p> <p>24 have two rows, one which is not -- there is</p> <p>25 nothing appearing in this second column. And</p>

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<p style="text-align: right;">247</p> <p>1 then below that is VAP. Do you have an</p> <p>2 understanding of what VAP means?</p> <p>3 A I've heard the term, but I do not</p> <p>4 know what it means, honestly.</p> <p>5 Q Is that voting age population?</p> <p>6 A Okay. Yes.</p> <p>7 Q Does that ring a bell?</p> <p>8 A That -- yes.</p> <p>9 Q And then if you look to your right</p> <p>10 and you see the Percent Total Black column?</p> <p>11 A Uh-huh (affirmative).</p> <p>12 Q Percent Total Black is at the top.</p> <p>13 And you'll see that the numbers under that</p> <p>14 column for 211 -- excuse me, District 111 show</p> <p>15 that the -- the first number is 35.37 percent.</p> <p>16 And then the second number is 32.31 percent.</p> <p>17 Is it correct or is it your</p> <p>18 understanding that those percentages, or the</p> <p>19 percentages for the District 111 of voting age</p> <p>20 black population, before HB 566 was 35.31</p> <p>21 percent and after HSB 566 the number declined</p> <p>22 to 32.31 percent?</p> <p>23 A I don't know. Honestly, I don't</p> <p>24 know how to read this.</p> <p>25 Q Setting aside the table, do you</p>	<p style="text-align: right;">249</p> <p>1 MR. STRICKLAND: VAP, right.</p> <p>2 MR. PHILLIPS: I'm sorry. Where</p> <p>3 are you on the chart? I may be misreading</p> <p>4 this.</p> <p>5 MR. KHOURY: So the 35.31 and the</p> <p>6 32.31, the first one is total population and</p> <p>7 the 32 is the VAP.</p> <p>8 MR. PHILLIPS: Oh, I apologize. I</p> <p>9 think you're right.</p> <p>10 MR. KHOURY: So there should be --</p> <p>11 yeah, there should be a line.</p> <p>12 MR. PHILLIPS: Yeah.</p> <p>13 MR. KHOURY: There could be like a</p> <p>14 line dividing that.</p> <p>15 MR. PHILLIPS: Yeah, so why don't</p> <p>16 we strike that.</p> <p>17 A So saying 32 percent of the voting</p> <p>18 age population or of voting age? I don't even</p> <p>19 know how to --</p> <p>20 MR. KHOURY: I think that's 32</p> <p>21 percent of the voting age population is --</p> <p>22 THE WITNESS: Is --</p> <p>23 MR. KHOURY: Falls under the total</p> <p>24 black category, which in and of itself is --</p> <p>25 MR. PHILLIPS: Right.</p>
<p style="text-align: right;">248</p> <p>1 recall that the number or the percentage of</p> <p>2 African-American voters in your district after</p> <p>3 566 was passed declined by a little more</p> <p>4 than -- or about 3 percentage points?</p> <p>5 A I don't know.</p> <p>6 MR. KHOURY: How -- Greg, help me</p> <p>7 out. Where is the before number? Which one</p> <p>8 is that?</p> <p>9 MR. PHILLIPS: I believe -- I</p> <p>10 confess that the before -- I believe, as I'm</p> <p>11 reading the chart, the before number is the</p> <p>12 first row that appears next to 111, and the</p> <p>13 second number is the post HB 566.</p> <p>14 MR. KHOURY: I think the second</p> <p>15 number is the VAP.</p> <p>16 MR. STRICKLAND: Yeah.</p> <p>17 MR. KHOURY: The percentage VAP,</p> <p>18 and the first number is the percentage total</p> <p>19 population. But that's how we've looked at it</p> <p>20 in previous depositions.</p> <p>21 MR. PHILLIPS: I'm sorry. Am I --</p> <p>22 MR. STRICKLAND: Isn't the first</p> <p>23 number T pop, total population, because --</p> <p>24 MR. KHOURY: Correct, and the</p> <p>25 second number is the VAP.</p>	<p style="text-align: right;">250</p> <p>1 MR. KHOURY: -- is not -- I mean,</p> <p>2 there's a lot packed into that too, so.</p> <p>3 THE WITNESS: Okay.</p> <p>4 Q Okay. Well, why don't we set this</p> <p>5 document aside. I clearly apparently have</p> <p>6 misread this.</p> <p>7 But in any case, you're not aware</p> <p>8 of whether or not the voting age population of</p> <p>9 black people in your district declined or not?</p> <p>10 A I'll be completely honest. I</p> <p>11 probably should know what VAP is. I've heard</p> <p>12 that terminology, but I don't know anything</p> <p>13 about it to be completely honest. I don't</p> <p>14 know. That's -- I let the political</p> <p>15 consultants figure that stuff out, and so I</p> <p>16 don't know.</p> <p>17 (Whereupon a document was identified</p> <p>18 as Plaintiff's Exhibit 285.)</p> <p>19 Q Okay. Let me show you another</p> <p>20 document which, which is a one-page document</p> <p>21 that I'm going to mark as Exhibit 285. And</p> <p>22 this is a one-page document consisting of an</p> <p>23 email apparently between Dan O'Connor, and</p> <p>24 it's to awl@sblaw, Bates number GA2-001571.</p> <p>25 Do you recall seeing this document</p>

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<p style="text-align: right;">251</p> <p>1 before?</p> <p>2 A No.</p> <p>3 Q Do you know to whom the email</p> <p>4 address awl, et cetera, belongs?</p> <p>5 A No. I don't recognize it.</p> <p>6 Q Do you know of an Anne W. Lewis of</p> <p>7 the Republican National Lawyers Association?</p> <p>8 A No.</p> <p>9 Q Would you have any reason to doubt</p> <p>10 me if I represented to you that that who is --</p> <p>11 that is who --</p> <p>12 A I don't know who she is. I've</p> <p>13 never heard of her, so I don't -- I've never</p> <p>14 dealt with anybody with -- is the national</p> <p>15 party, I guess, is you're saying? I've never</p> <p>16 dealt with anybody in the national party.</p> <p>17 Q If you could look at this email, it</p> <p>18 says follow-up -- the subject is Follow-Up,</p> <p>19 President's Day Dinner?</p> <p>20 A Uh-huh (affirmative).</p> <p>21 Q And if you look at the last</p> <p>22 paragraph on the page, it says that these --</p> <p>23 the D -- excuse me, "the redistricting changes</p> <p>24 in the House made last week, the minority</p> <p>25 percentages changed little, even for the two</p>	<p style="text-align: right;">253</p> <p>1 Representative Chandler's seat. I just didn't</p> <p>2 follow it. I was focused on my own race.</p> <p>3 Q Okay.</p> <p>4 A I don't remember who else was</p> <p>5 affected by this, but I don't -- I'm of the</p> <p>6 opinion, I didn't get any sort of advantage,</p> <p>7 and I don't think the party got any sort of</p> <p>8 advantage from any changes to 111. I may be</p> <p>9 wrong.</p> <p>10 Maybe the party did somehow down</p> <p>11 the road. Someone else will now be running</p> <p>12 for that seat this year. But I disagree with</p> <p>13 this.</p> <p>14 Q And then he goes on to say, "Under</p> <p>15 HB 566, Chandler's district drops from 36.69</p> <p>16 percent to 34.69 percent black -- just a two</p> <p>17 percent drop -- and Strickland's drops by 2.53</p> <p>18 percent from 37.84 percent to 35.31 percent."</p> <p>19 Do you see that?</p> <p>20 A Yes.</p> <p>21 Q Were you aware of the drop in the</p> <p>22 percentage of blacks in your district as a</p> <p>23 result of HB 566?</p> <p>24 A No, and I'm not sure this is</p> <p>25 correct.</p>
<p style="text-align: right;">252</p> <p>1 main beneficiaries, Joyce Chandler in</p> <p>2 Gwinnett's HD 105 and Brian Strickland in</p> <p>3 Henry's HD 111."</p> <p>4 Would you agree with Mr. O'Connor's</p> <p>5 statement that you were one of the "two main</p> <p>6 beneficiaries," quote-unquote, of the</p> <p>7 redistricting changes of 2015?</p> <p>8 A No.</p> <p>9 Q Are there other people that you</p> <p>10 believe benefited more from the redistricting</p> <p>11 changes?</p> <p>12 A I don't know. I told you earlier</p> <p>13 I'm not sure I personally benefited at all</p> <p>14 from it. One thing, I laughed when you first</p> <p>15 put this in front of me, is that Mr. O'Connor</p> <p>16 seems to have a lot of opinions about</p> <p>17 politics, but he was wrong on one thing in the</p> <p>18 first paragraph here.</p> <p>19 He said that the presidential race</p> <p>20 would come down to Florida and Ohio. That</p> <p>21 wasn't the case. So he likes to make a lot of</p> <p>22 predictions about politics. I'm not sure how</p> <p>23 much credibility I give him. But I don't</p> <p>24 know. I don't have any opinion.</p> <p>25 I don't know what happened with</p>	<p style="text-align: right;">254</p> <p>1 Q What -- I'm sorry.</p> <p>2 A Well, earlier I saw numbers that</p> <p>3 showed there's a miscellaneous other race</p> <p>4 of -- I don't know if it was over 10 percent</p> <p>5 that said that was in 111, so I don't -- I'm</p> <p>6 not sure how we can ever say whether or not</p> <p>7 the people in 111 -- whether or not the black</p> <p>8 population in 111 increased or decreased as a</p> <p>9 result of House Bill 566.</p> <p>10 Q So -- okay.</p> <p>11 A I think there's statistical issues</p> <p>12 and assumptions made. And the problem is</p> <p>13 nobody actually knows how many people -- what</p> <p>14 people look like overall in a district.</p> <p>15 Q So can you just tell me what are</p> <p>16 the -- the bases, if you have any, other bases</p> <p>17 for disagreeing or suspecting Mr. O'Connor's</p> <p>18 conclusion that the percentage of black people</p> <p>19 in your district dropped as a result of HB 566</p> <p>20 by 2.53 percent?</p> <p>21 A Do I have any other than what I've</p> <p>22 said?</p> <p>23 Q Yes.</p> <p>24 A Also the other thing I would say is</p> <p>25 this doesn't have anything for 2016. I think</p>

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<p style="text-align: right;">255</p> <p>1 the right thing to do would be to look, in my 2 opinion, at political races from '14 to '16, 3 Republican-Democrat, and see if there really 4 was a change in the voting. 5 When I do that, I see my numbers 6 went slightly down. So I would argue that 7 Democrats actually got an advantage with House 8 Bill 566 with 111. 9 Q Well, isn't it correct, Senator, 10 that if -- let's assume for a moment that the 11 demographics of your district were changing 12 between 2012 and 2015. You won election in 13 2014; is that correct? 14 A Correct. 15 Q Certain changes were made to your 16 district in 2015; is that correct? 17 A Correct. 18 Q Is it your view that if those 19 changes in 2015 had not occurred that you 20 would have won your district by a larger 21 percentage than you in fact did win it in 22 2016? 23 A I think possible -- 24 MR. KHOURY: I'm going to object to 25 the form of the question, but you can answer.</p>	<p style="text-align: right;">257</p> <p>1 someone only votes based on what they look 2 like, which I think is the definition of 3 racism to say that. 4 Q And you say that even though the 5 overwhelming majority of African-Americans 6 vote for Democrats? 7 MR. KHOURY: Object to the form of 8 the question. 9 A I don't think that's a fair 10 statement. Go to my district, Henry County. 11 My GOP chair is African-American. The 12 chairperson of our County Board of 13 Commissioners is African-American. Both are 14 Republicans. 15 When I knock on doors, when I go to 16 African-American churches, I get great 17 response despite the fact I'm a Republican. I 18 think the party has national issues, but I 19 don't believe that applies at the state level. 20 Q Did you ever solicit public comment 21 on changes that you proposed for your district 22 in 2015, comments from either your 23 constituents or a broader range of people? 24 A Personally, no, but we did have 25 hearings on it. And so I don't -- if I have a</p>
<p style="text-align: right;">256</p> <p>1 A I think it's -- I'm speculating, 2 but I think yes because I did better in '14 3 than I did in '12. And my numbers in '16 were 4 slightly down from '14 as far as the votes I 5 got. And so I think in hindsight I probably 6 would have been better served personally if 7 I'd kept the same district I had, people that 8 knew me and voted for me previously. 9 Q But if the demographics of your 10 district were changing, and let me just ask 11 you to assume that for a second, for a minute, 12 isn't it possible that the changes in your 13 district resulted in the -- in a greater 14 percentage of votes for you than would have 15 been the case had the district remained as it 16 was in 2014? 17 A Oh, that would assume that the 18 change in demographics -- that because of who 19 somebody is, they wouldn't vote for me, and 20 that's not my experience. So that -- the 21 assumption you'd have to make there, if you're 22 saying that African-American numbers are 23 getting higher in my district, therefore, I 24 would have gotten less votes, I think that's a 25 flawed assumption because that means that</p>	<p style="text-align: right;">258</p> <p>1 bill, I don't in particular go and necessarily 2 gather comments. It takes care of itself, 3 honestly. 4 My constituents seem to usually 5 follow what we're doing pretty well, even 6 better than some of the districts because I'm 7 so close to Atlanta. I think they follow 8 what's on the news more, and they come up and 9 visit me more. 10 So I don't recall. And I guess if 11 there were no emails about it, I don't recall 12 any emails from any constituents addressing 13 this process one way or another. I don't 14 recall it. I don't recall any sort of 15 communication from back home about it, and I 16 don't recall anybody coming to any of the 17 hearings about it. 18 Q When you say "hearings," was 19 hearings held by? 20 A The committee process. 21 Q The Reapportionment Committee? 22 A Correct, the committee process 23 every bill goes through. 24 Q Did you by any chance hold any town 25 meetings?</p>

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<p style="text-align: right;">259</p> <p>1 A No.</p> <p>2 Q Or similar gatherings about this?</p> <p>3 A No, but that's not -- again, I</p> <p>4 don't do that with bills. I -- but that said,</p> <p>5 I may -- I do routinely have town halls during</p> <p>6 session, so I don't know if this came up at a</p> <p>7 town hall or not.</p> <p>8 So I do normally hold town halls</p> <p>9 during my legislative session just to get</p> <p>10 feedback on issues, but I don't recall whether</p> <p>11 or not this one was addressed.</p> <p>12 Q Do you believe generally that</p> <p>13 members of the House of Representatives have</p> <p>14 the right to choose who is in their district?</p> <p>15 A Yes. That's how it works.</p> <p>16 Q And do you believe that the</p> <p>17 constituents in your district were adequately</p> <p>18 informed about the proposed changes to your</p> <p>19 district?</p> <p>20 A Yes.</p> <p>21 Q How, how do you understand they</p> <p>22 were informed of the changes --</p> <p>23 A Because it went through --</p> <p>24 Q -- the proposed changes? Excuse</p> <p>25 me.</p>	<p style="text-align: right;">261</p> <p>1 A That was the first time --</p> <p>2 Q Were there any -- strike that.</p> <p>3 A That was the first time anybody</p> <p>4 ever had any issue with, with the</p> <p>5 redistricting --</p> <p>6 Q Right.</p> <p>7 A -- was when the lawsuit was filed.</p> <p>8 Q Did you have any interviews with</p> <p>9 any members of the press, either television or</p> <p>10 other, other media, about the redistricting</p> <p>11 process before HB 566 was passed?</p> <p>12 A I don't recall. I really don't</p> <p>13 remember. I do a lot of interviews, but I</p> <p>14 don't recall.</p> <p>15 Q Did you publish any articles, op ed</p> <p>16 pieces, or anything else regarding HB 566</p> <p>17 before it was passed?</p> <p>18 A I don't know. I do a weekly</p> <p>19 newsletter to constituents, let them know the</p> <p>20 bills we have each week. So I'm assuming it</p> <p>21 would have been out in that newsletter, but I</p> <p>22 don't know.</p> <p>23 Q Is -- where is -- is your</p> <p>24 newspaper -- strike that.</p> <p>25 Is your weekly newsletter published</p>
<p style="text-align: right;">260</p> <p>1 A It went through the same process</p> <p>2 that we always go through with redistricting.</p> <p>3 It sat in committee, and it was all available</p> <p>4 online. We even had the, the maps. If I</p> <p>5 recall, I remember -- I think one of these</p> <p>6 sheets had a map that showed the state as a</p> <p>7 whole and the districts being affected, so all</p> <p>8 that was out for everyone to see.</p> <p>9 I don't remember if there was a lot</p> <p>10 of local press on it. I don't -- just don't</p> <p>11 recall. But it's part of our function as a</p> <p>12 representative. Part of our job is to deal</p> <p>13 with issues like this.</p> <p>14 Q And I believe -- or strike that.</p> <p>15 Other than the -- I think you had</p> <p>16 an -- you mentioned an article in a local</p> <p>17 newspaper that you had -- where you had</p> <p>18 addressed some issues relating to</p> <p>19 redistricting; is that correct? We talked</p> <p>20 about this early in the session.</p> <p>21 A No. That was actually about the</p> <p>22 lawsuit.</p> <p>23 Q Oh, that's right. I apologize.</p> <p>24 A Yeah.</p> <p>25 Q My mistake.</p>	<p style="text-align: right;">262</p> <p>1 online?</p> <p>2 A Yes.</p> <p>3 Q And do you know if it still exists</p> <p>4 online?</p> <p>5 A I would have said yes until I got</p> <p>6 elected to the Senate. I know my, my website</p> <p>7 had every one on there. And my Facebook page,</p> <p>8 you could still go through my Facebook page,</p> <p>9 I'm sure, and pull it up because I had</p> <p>10 transferred my House page to a Senate page by</p> <p>11 changing the name of it.</p> <p>12 And so all of that information</p> <p>13 would still be online if it's there.</p> <p>14 (Whereupon a document was identified as</p> <p>15 Plaintiff's Exhibit 50.)</p> <p>16 Q Okay. I'd like to have you look at</p> <p>17 a document which has been marked previously as</p> <p>18 Exhibit 50. This is a two-page document. The</p> <p>19 first page is Bates marked GA000077, and it</p> <p>20 appears to be an email from Mr. O'Connor to</p> <p>21 Ms. Wright dated February 1st, 2017.</p> <p>22 And the subject is Comparison of HD</p> <p>23 105 (Chandler) and 111 (Strickland). If you</p> <p>24 could take a look at this, please.</p> <p>25 A Oh, there are my numbers. I've</p>

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<p style="text-align: right;">263</p> <p>1 been trying to guess.</p> <p>2 Q I'm sorry. I didn't mean to</p> <p>3 interrupt your reading.</p> <p>4 A Well, it shows, if this is correct,</p> <p>5 it shows I got 53 percent of the vote in 2012.</p> <p>6 I went up 53.1 in 2014, and then I went down</p> <p>7 to 51.7 in 2016. So that's consistent with</p> <p>8 what my memory was, that my numbers actually</p> <p>9 went up until we did this change.</p> <p>10 Q So do you -- do you agree that --</p> <p>11 or do you have any reason to doubt that these</p> <p>12 numbers, election result numbers reported here</p> <p>13 by Mr. O'Connor, were accurate?</p> <p>14 A I don't know about the rest of the</p> <p>15 numbers, but I -- it seems consistent with my</p> <p>16 memory that my election results went up from</p> <p>17 '12 to '14 but down to '16.</p> <p>18 I do remember 51.7 now that I see</p> <p>19 that as -- well, I think I testified I thought</p> <p>20 it was 52-point something, so maybe I don't</p> <p>21 remember. So I don't know. I'd have to look</p> <p>22 at the actual numbers, but it's consistent</p> <p>23 with my memory that I went up and then down.</p> <p>24 Q Okay. And do you have any basis</p> <p>25 for saying that the number for 2016 might be</p>	<p style="text-align: right;">265</p> <p>1 A I'm sorry. Are you asking about</p> <p>2 the 47.8 to 50.3 number?</p> <p>3 Q No. I'm sorry. I'm looking at the</p> <p>4 paragraph which begins just after the</p> <p>5 statement -- after the note that in the 2016</p> <p>6 election you had 51.7 percent of the vote.</p> <p>7 A Okay.</p> <p>8 Q And it begins, "the 'old' HD 111</p> <p>9 would have had a 50.2 percent total Republican</p> <p>10 average." See that?</p> <p>11 A Yes.</p> <p>12 Q Do you have any reason to doubt</p> <p>13 that information?</p> <p>14 A I don't have any -- I have no</p> <p>15 reason to believe it or doubt it. I don't --</p> <p>16 I do not know what is considered total</p> <p>17 Republican average. I don't know what he</p> <p>18 means by it.</p> <p>19 Q Okay. Do you know with regard to</p> <p>20 the precincts of District 111 that were not</p> <p>21 changed by the 2015 plan, did you do better or</p> <p>22 worse in 2016 than in 2014, if you recall?</p> <p>23 A I don't recall. I don't -- I think</p> <p>24 it varied precinct by precinct. I don't</p> <p>25 recall. So there was some different local</p>
<p style="text-align: right;">264</p> <p>1 wrong?</p> <p>2 A I just don't remember. I just -- I</p> <p>3 was thinking it was -- maybe it was rounding</p> <p>4 up to 52 percent, but I was thinking I was</p> <p>5 over 52 percent. I don't -- I know that on</p> <p>6 election night there was some late -- a late</p> <p>7 precinct that came in or some absentees that</p> <p>8 came in later that changed the ultimate number</p> <p>9 and it went up slightly.</p> <p>10 So it may have been 51.9 instead of</p> <p>11 7. I don't know. But that's out there. We</p> <p>12 can pull it up in a second.</p> <p>13 Q And then it says here on --</p> <p>14 Mr. O'Connor states in the paragraph following</p> <p>15 the number for the 2016 election, he states,</p> <p>16 "the 'old' HD 111 would have had a 50.2</p> <p>17 percent total Republican average (2014 cycle);</p> <p>18 the 'new' HD 105" -- strike that. Okay.</p> <p>19 So let's end it after the "(2014</p> <p>20 cycle)" part of that sentence. So it says,</p> <p>21 again, to repeat, "the 'old' HD 111 would have</p> <p>22 had a 50.2 percent total Republican average</p> <p>23 (2014 cycle)."</p> <p>24 Do you have any reason to doubt</p> <p>25 that information?</p>	<p style="text-align: right;">266</p> <p>1 issues in '16. Are you talking about '16</p> <p>2 versus '14?</p> <p>3 Q Yes.</p> <p>4 A Okay. The big difference in the</p> <p>5 two races is that '16, there was a -- it's in</p> <p>6 the weeds, but it's important. I'll say it</p> <p>7 for the record.</p> <p>8 District 2, the Henry County Board</p> <p>9 of Commissioners had a very contested race.</p> <p>10 The local Democrat party focused on trying to</p> <p>11 flip it to become a Democrat seat. It had</p> <p>12 been previously held by a Republican. A very</p> <p>13 strong, conservative African-American female</p> <p>14 ran as a Democrat and beat a -- what people</p> <p>15 thought was a strong Republican male in the</p> <p>16 race.</p> <p>17 And she outperformed everywhere</p> <p>18 that this -- statistically she should have</p> <p>19 done. She did really well with a lot of</p> <p>20 traditional Republican voters. But it also</p> <p>21 drove up turnout in certain precincts I had.</p> <p>22 I think it helped me in some places because</p> <p>23 people voting for her voted for me too.</p> <p>24 But it may have also hurt me in</p> <p>25 some places if she was able to get some</p>

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<p style="text-align: right;">267</p> <p>1 additional resources from the state Democrat 2 party behind her. 3 It's in the weeds, but it's 4 important because that affects precincts such 5 as the Lowes precinct, anything west of 75, 6 and -- everything west of 75, actually, all 7 the way up I believe to Flippen. That 8 precinct as well would have had different 9 numbers from '16 to '14 based on that 10 District 2 race. 11 If you look on the ground, the 12 Henry County Democrat party with the aid of 13 the state party focused on that main race and 14 let other races go by, such as mine, where 15 they did not help my opponent. 16 Q I'm sorry. And what was the issue 17 regarding -- you said a race for the -- what 18 was the issue that you were focused on? 19 A Oh, it just was a -- it was a 20 vacant District 2 commission seat that had 21 historically been Republican. And a very 22 strong Democrat -- and when I say "very 23 strong," what I mean is someone that gets the 24 Republicans to vote for them too -- ran and 25 worked very hard against the Republican</p>	<p style="text-align: right;">269</p> <p>1 Representatives about HB 566 at any time? 2 A Not that I recall. My recollection 3 of it was one of those few easy bills that had 4 no opposition. I don't remember anybody 5 speaking on it other than the author, but I 6 may be wrong. There's a video of that that 7 can be pulled up and you could see, but I 8 don't recall speaking on it. 9 Q Either in committee or in the House 10 floor? 11 A Correct. I don't, I don't remember 12 going to the committee. I'm not on that 13 committee. I don't remember being at the 14 committee. 15 Q To the best of your knowledge, does 16 this document reflect -- accurately reflect 17 the final version of House Bill 566 -- 18 A Oh, I don't know. 19 Q -- that was signed into law? 20 A I couldn't testify to that 21 honestly. I don't know. It's these things -- 22 when you have -- apparently, you have 23 districting, as I've seen in annexation bills. 24 You have all these things I don't understand, 25 these numbers.</p>
<p style="text-align: right;">268</p> <p>1 candidate who did not work as hard and was not 2 as strong of a candidate. 3 And what's important to note is the 4 local Democrat party, while half of them were 5 endorsing me and not getting involved in my 6 race, they all engaged and focused on that 7 race, and it actually drove up more Democrat 8 turnout in that area. 9 So I don't -- that's a long answer 10 to say I don't know, but it's not based solely 11 on any changes that were made or any change in 12 demographics. 13 (Whereupon a document was identified as 14 Plaintiff's Exhibit 94.) 15 Q I see. Let me have you look at 16 exhibit -- I'd like to show you a document 17 that's been previously marked as Exhibit 94. 18 And, Senator, do you recognize this 19 document? 20 A I do not, but it appears to be a 21 copy of House Bill 566. 22 Q And just for the record, you voted 23 for House Bill 566? 24 A Yes. Every representative did. 25 Q Did you speak in the House of</p>	<p style="text-align: right;">270</p> <p>1 And so there's no -- the only thing 2 I could do is say, if you tell me it says on 3 our website this is the final version as 4 passed by both chambers and signed by the 5 governor, I'd believe you. Otherwise, I don't 6 know. 7 Q If you look at pages 13 and 14 of 8 the -- of Exhibit 94, you'll see about the 9 middle of the page at number 446, it says 10 District 111? 11 A Yes. 12 Q And if you could look down the 13 information that's included down at the bottom 14 of H -- excuse me, page 13 and then turn the 15 page and go down to the line 489, which is 16 just above the District 121? 17 A Uh-huh (affirmative). 18 Q Did these -- does this information 19 accurately reflect the changes to your 20 district? 21 A I don't know. I don't know what 22 this information means. I do know that line 23 479, there is no McDonough Center precinct. 24 I'm not sure if anybody ever noticed that. 25 This is the final version of the bill, and</p>

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<p style="text-align: right;">271</p> <p>1 there's definitely an issue with the way it's</p> <p>2 written.</p> <p>3 Q What is McDonough Center if it's</p> <p>4 not at precinct?</p> <p>5 A I don't know. I think they meant</p> <p>6 to say McDonough Central if it's a precinct,</p> <p>7 but I don't know how the -- I don't know what</p> <p>8 these numbers mean. I have no idea.</p> <p>9 Q I'm sorry. I think you've</p> <p>10 occasionally mentioned in the course of the</p> <p>11 deposition an area named McDonough square?</p> <p>12 A Yes.</p> <p>13 Q Is that -- just for my information,</p> <p>14 what is that?</p> <p>15 A That is McDonough Central precinct.</p> <p>16 That is -- and it was split before, and it was</p> <p>17 split afterwards. It's the battleground</p> <p>18 everybody wants, and it's -- has nothing to do</p> <p>19 with politics.</p> <p>20 Q What does it have to do with?</p> <p>21 A It's just whether or not you want</p> <p>22 to live there I guess or you do business</p> <p>23 there.</p> <p>24 Q Oh. That's --</p> <p>25 A It's just the center of town, and</p>	<p style="text-align: right;">273</p> <p>1 Q Any concern that the proposed</p> <p>2 changes unduly split voting precincts?</p> <p>3 A No.</p> <p>4 Q Or counties?</p> <p>5 A No.</p> <p>6 Q Any concern that the proposed</p> <p>7 changes didn't sufficiently keep together</p> <p>8 members of a community of interest?</p> <p>9 A One concern. You're talking about</p> <p>10 the '15 legislation?</p> <p>11 Q Yes.</p> <p>12 A I haven't discussed this yet, I</p> <p>13 alluded to it earlier, but the city of Hampton</p> <p>14 was taken out of 111. I personally would like</p> <p>15 to see Hampton not just have someone from</p> <p>16 Spalding County representing it, which is why</p> <p>17 in 2017, when the maps were revisited again, I</p> <p>18 argued that Hampton should be put back in</p> <p>19 2011.</p> <p>20 And I think one the versions of the</p> <p>21 maps at that point did that.</p> <p>22 Q So Hampton is in which county?</p> <p>23 A It's Henry County, but it's one of</p> <p>24 the four cities. But it's -- when 111 became</p> <p>25 a McDonough-Locust Grove-Eagle's Landing</p>
<p style="text-align: right;">272</p> <p>1 it's very diverse politically and racially,</p> <p>2 all the way around. So I don't know who wins</p> <p>3 it. I think -- I've always won it, but I</p> <p>4 don't give credit to anything other than me</p> <p>5 living there, knowing people on the ground</p> <p>6 there.</p> <p>7 Q Let me just ask you a few</p> <p>8 questions. These will be familiar, I think,</p> <p>9 with regard to other things that we've been</p> <p>10 talking about.</p> <p>11 Did you at any point have any</p> <p>12 concern that the proposed changes to the map</p> <p>13 of House District 111 violated any federal or</p> <p>14 state law?</p> <p>15 A No.</p> <p>16 Q Did you have any concern that the</p> <p>17 changes, proposed changes, contained errors in</p> <p>18 terms of the descriptions --</p> <p>19 A No.</p> <p>20 Q -- of the district?</p> <p>21 A No.</p> <p>22 Q Any concern that the proposed</p> <p>23 changes were unfair to any racial or ethnic</p> <p>24 minority?</p> <p>25 A No.</p>	<p style="text-align: right;">274</p> <p>1 district, if you will, which, again, made some</p> <p>2 sense in '15 to do that, it took out Hampton.</p> <p>3 From a personal standpoint, again,</p> <p>4 I grew up in that area, but the people in</p> <p>5 Hampton -- no offense to Representative</p> <p>6 Mathiak who has it now. She does a great job,</p> <p>7 and I was actually happy the way she's engaged</p> <p>8 there.</p> <p>9 But she could disregard Hampton and</p> <p>10 focus solely on Spalding County south of there</p> <p>11 and Griffin and get reelected because</p> <p>12 Hampton's not as many votes. So they, in my</p> <p>13 opinion, are not -- unless you have someone</p> <p>14 like Representative Mathiak there, who does</p> <p>15 care, they could easily be disregarded the way</p> <p>16 it currently is set up.</p> <p>17 So I think in '15 that you could</p> <p>18 argue that it divided communities in a way we</p> <p>19 could have done a better job with.</p> <p>20 Q And was Hampton previously entirely</p> <p>21 within 111?</p> <p>22 A No. It was split.</p> <p>23 Q Split?</p> <p>24 A But again, that was one of those</p> <p>25 places that was split. But in hindsight, it</p>

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<p style="text-align: right;">275</p> <p>1 may have been better to be split than to not 2 just have one person that's not from Henry 3 County have it. 4 Q Did you at any point have any 5 concern that the proposed changes to 111 6 were -- constituted unconstitutional 7 gerrymandering -- 8 A No. 9 (Whereupon a document was identified 10 as Plaintiff's Exhibit 47.) 11 Q -- of any type? So I'd like to 12 show you a document that's previously been 13 marked as Exhibit 47. 14 So this document bears Bates number 15 GA000001 to Bates number GA, multiple zeros, 16 2, and its entitled Information Midterm 17 Redistricting and HB 566 (State House -- hey, 18 State House -- Redistricting Bill - 2015). 19 Do you recognize this document? 20 A No. I just -- the one thing I 21 noticed with your Exhibit 94, that to further 22 prove -- I know you don't want to hear this. 23 I'm going to say it one more time for the 24 record -- that this was a nonpartisan bill 25 that had support of not only Democrats but all</p>	<p style="text-align: right;">277</p> <p>1 hindsight, I would just as soon it stay as it 2 was, but I was pleased overall with what 3 happened. 4 (Whereupon a document was identified 5 as Plaintiff's Exhibit 286.) 6 Q Let me ask you to look at a 7 document which is a single-page document Bates 8 numbered GA2-001388. And this is going to be 9 marked as Exhibit 286 for identification. 10 And this appears to be an email 11 from Mr. O'Connor to Mr. Jordan. Data, 2012 12 President by State House District, et cetera. 13 Do you recognize this document? 14 A No. 15 Q In the second -- well, in the first 16 paragraph, Mr. O'Connor says, among other 17 things, that, excuse me, he's attached a table 18 "showing how the State House districts (under 19 HB 566 passed last session, which made changes 20 to about a dozen and a half districts) voted 21 in the 2012 presidential election. 22 "The main Republican beneficiaries 23 (of these changes) were Joyce Chandler of HD 24 105 in Gwinnett and Brian Strickland of HD 111 25 (as listed below)."</p>
<p style="text-align: right;">276</p> <p>1 the African-Americans in the chamber, the -- 2 one of the primary sponsors of the bill was 3 Stephens of the 165th. 4 And according to this, that jogs my 5 memory, that was Mickey Stephens, who is a 6 black Democrat, who primarily sponsored this 7 bill. And so that gives me more reason to 8 know there was nothing -- I trust 9 Representative Stephens, and I trusted at the 10 time Minority Leader Abrams to know that if I 11 was indirectly discriminating against 12 somebody, they would -- they wouldn't sponsor 13 it. 14 Q Do you know who prepared this? I 15 think you said you hadn't seen this before. 16 A I haven't seen this before. I 17 don't know. 18 Q Okay. You can set that aside. 19 A Okay. 20 Q Were you pleased with the changes 21 that were ultimately made to your district 22 for -- by HB 566? 23 A Given the fact that changes were 24 made, yes. It was considered in the 25 negotiation that we had over it. Again,</p>	<p style="text-align: right;">278</p> <p>1 And I think is actually the same -- 2 practically the same thing he said in a 3 previous email we looked at. 4 A Uh-huh (affirmative). 5 Q Does this in any way refresh your 6 recollection that you were in fact one of the 7 main beneficiaries of 566? 8 A No. 9 MR. KHOURY: Object to the form. 10 A Because -- 11 MR. KHOURY: Go ahead. 12 A This would just assume that -- I'm 13 not sure how you can run these numbers. But 14 assuming they ran numbers that showed that 15 Romney would have gotten four more points and 16 Obama would have gotten four less points, the 17 assumption would have to be made that those 18 same people would have -- that voted for 19 Romney would have voted for me. 20 And we had different numbers 21 precinct by precinct that I looked at, so. 22 But on the surface, you could argue that the 23 party as a whole -- I mean, you could make an 24 argument it would have benefited in a new map 25 then based on this, if you do have stronger</p>

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<p style="text-align: right;">279</p> <p>1 Republican numbers, if you consider this a 2 benchmark political race to look at. 3 But did it personally benefit me? 4 I don't know. But you could definitely argue 5 that it was a good political move then for the 6 state GOP, if you will. I think Mr. O'Connor 7 was more concerned about the brunch bill, 8 apparently, in that last paragraph. 9 Q I'm sorry. One second. 10 Mr. O'Connor in the second paragraph -- well, 11 strike that. 12 The information included in the 13 sort of chart that Mr. O'Connor includes in 14 the email after the first paragraph indicates, 15 does it not, that under the old map the 2012 16 president race in your, in your precinct 17 resulted in a vote of Romney 50 percent and 18 Obama 49 percent. Do you see that? 19 A That's what it says. 20 Q And then he indicates that under 21 the new map, that is, the 2015 map, if you had 22 run the 2012 presidential race under that new 23 map, that Romney would have received 54 24 percent of the vote while Obama would have 25 received 45 percent of the vote, which he</p>	<p style="text-align: right;">281</p> <p>1 that 111 was going to have would have any 2 benefit for Republicans or how the other areas 3 would be affected around it. 4 And I don't recall there being 5 hardly any benefit for Republicans when it 6 came to 111 based on the '14 information we 7 saw. 8 Q Just make sure, I mean, you said 9 "you" assuming. I'm not assuming anything. 10 You're saying that Mr. O'Connor is assuming in 11 these statements. 12 A Yes. 13 Q Correct? 14 A Mr. -- yes. 15 (Whereupon a document was identified as 16 Plaintiff's Exhibit 287.) 17 Q Let me, sorry, show you a document 18 that I'm going to mark as Exhibit 287 for 19 identification. 20 MR. KHOURY: He's gone. 21 Mr. Strickland had to leave. 22 THE WITNESS: My cousin left. 23 MR. KHOURY: You can just keep it. 24 THE WITNESS: For the record, he's 25 not really my cousin, we don't think. We may</p>
<p style="text-align: right;">280</p> <p>1 says -- and then he follows that with, "each 2 candidate picked up a four to five-point GOP 3 margin." 4 Is that your understanding of what 5 Mr. O'Connor is saying here? I'm not asking 6 if you agree with it, but -- 7 A Okay. 8 Q -- is that consistent with -- 9 A It appears to be what he's saying. 10 Q Okay. Do you have any reason to 11 doubt Mr. O'Connor's conclusions in that 12 regard? 13 A Yes. Other than what I said 14 earlier, you're also assuming that in 2015, 15 three years later, that same area would have 16 voted for a Republican presidential candidate 17 in the same margin. 18 But if Henry County has shifting 19 demographics, changing demographics, as you've 20 alluded to earlier, then there's no way to 21 know unless we looked at '14 numbers. 22 I think a better thing to look at, 23 and I feel like I looked at this, my 24 recollection is I looked more at the 25 governor's race of 2014 to see if the new area</p>	<p style="text-align: right;">282</p> <p>1 be related back from the 1700s, but. 2 MR. PHILLIPS: So he doesn't need 3 any more -- you don't want to have copies for 4 him? 5 MR. KHOURY: No. I -- 6 MR. PHILLIPS: Okay. 7 MR. KHOURY: No. I thank you. 8 Q So, Senator, this is an email. It 9 appears to be from -- it's an email string, 10 but the last email on the top of the page one 11 is from Mr. Jordan to Mr. O'Connor. It's 12 dated October 21st, 2016. And the subject is 13 Voter Registration Data, Selected House 14 Districts October 2016. 15 And the first page is Bates labeled 16 GA2-000128, and the second page is 129. And 17 could you please review the page -- the second 18 page of the document, in particular with the 19 part of the information which begins with -- 20 in the middle of the page which begins with, 21 "House District 111"? 22 A Yes, and I just read it. 23 Q Do you see that? Okay. And there 24 it says, paren -- "House District 111 (Brian 25 Strickland) has seen increase of about 2,000</p>

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<p style="text-align: right;">283</p> <p>1 blacks, 1,000 whites, 100 Asians, and 100 2 Hispanic -- 150 Hispanics, totals as follows." 3 And then he compares, my 4 understanding is, March 2016 to October 2016. 5 A Uh-huh (affirmative). 6 Q Do you see that? 7 A Yes. 8 Q Do you have any reason to doubt the 9 accuracy of Mr. O'Connor's statements? 10 A No, but there's a reason there's a 11 two percent, I guess some, yeah, two percent 12 increase in the black voter registration. 13 Q What is, what is that reason? 14 A In 2016, I was running for 15 reelection. And Stacey Abrams and another 16 group, that political group she had and also a 17 subdivision of a George Soros group, did a big 18 voter registration drive in Henry County, but 19 they focused solely on black voters, and they 20 had two targets. 21 One was to pick up 111 for 22 Democrats. The second was to pick up a 23 district attorney's race for Democrats in 24 Henry County. They were so successful between 25 March and October that the Republican</p>	<p style="text-align: right;">285</p> <p>1 I don't know why Ben Jordan and 2 Caulder Childs, why they wanted that, but they 3 probably were looking to see the numbers they 4 saw in our -- in the Republican House 5 districts. 6 Q Can you remind who Ben Jordan is? 7 A Ben is -- the email you had earlier 8 has him at the majority leader's office, at 9 his counsel majority leader office. So he 10 worked for Jon Burns who was majority leader 11 at the time. Now he's I think a lobbyist, I 12 believe. 13 Q And do you know who Caulder Childs 14 is? 15 A Yes. Caulder worked -- I don't 16 know his title, but he worked for -- his job 17 changed. But at some point, I think he worked 18 for the majority party in the House with 19 politics. I don't know what his actual title 20 was or what, what his role actually was. 21 But he was involved in the 22 political side of things for the majority 23 party with their reelection efforts. 24 Q And do you know why Mr. O'Connor 25 would have sent this to, this information</p>
<p style="text-align: right;">284</p> <p>1 candidate for district attorney dropped out of 2 the race because he got scared and said, I 3 can't win. 4 And so I remember this very well. 5 And I, I don't remember these exact numbers, 6 but the 2,000 -- he says increase of about 7 2,000 blacks, a thousand whites, a hundred 8 Asians. I see that number. 9 I do recall a large number, though, 10 of new voter registrations that were done by 11 this group. And this group was a racially 12 motivated group, and they were focusing solely 13 on race and solely on registering black 14 voters. And it was part of the Stacey Abrams 15 plan to win certain seats in 2016. 16 Q Do you know why Mr. O'Connor 17 prepared this information as of -- in October 18 of 2016, the information which I -- we just 19 discussed? 20 A No, I have no idea. I'm assuming 21 someone wanted to know what -- it was a big 22 story in the AJC, Jim Galloway, you mentioned 23 earlier. There was a big write-up on this 24 issue in Henry County, but I don't know about 25 the other seats.</p>	<p style="text-align: right;">286</p> <p>1 to -- 2 A Oh, I don't know. You'd have to 3 ask him. They probably requested it, but I 4 don't know. 5 I never saw it. I was in the 6 middle of an election, and nobody ever sent it 7 to me. I didn't know the exact numbers. 8 Q Did you have any view as to whether 9 or not the increase in the number of 10 African-American voter registrations increased 11 or decreased your chances for reelection? 12 A I think there was a perception it 13 decreased it. I don't think it decreased 14 because they were black. It decreased it 15 solely because they were new voters. And I 16 was having trouble that year. When I say 17 "having trouble," my challenge in 2016 was 18 dealing with a new batch of voters that I 19 hadn't met yet that were being registered. 20 And so it was an effort by this 21 liberal group, and I'm using the term liberal, 22 their goal was just to elect Democrats in 23 general. It was an effort to do a big voter 24 registration drive for new voters. 25 These weren't, you know, as some</p>

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<p style="text-align: right;">287</p> <p>1 people said, new people moving in as much as 2 they were people who hadn't voted before. 3 That was a big part of their plan. And so the 4 challenge I had was keeping up with that to 5 make sure that the data I use, and that's just 6 the people I would go knock on doors for, when 7 I would pull voter registration lists to try 8 to go knock on doors, was keeping up with this 9 data. 10 It turns out it didn't make a huge 11 difference in the race. My key to my victory, 12 again, was local African-Americans were 13 endorsing me and supporting me. And the local 14 Democrat party was still helping me in some 15 ways, so. 16 Q Did you have -- do you have any 17 information as to how these newly registered 18 voters voted? 19 A I don't know. There's no way of 20 knowing. Apparently, a lot of them voted for 21 me because it -- looking at -- maybe that 22 explains why I went down to the 51.7 after all 23 this, is the new voters. 24 So no matter what was done in 2015, 25 the one thing you might could give some credit</p>	<p style="text-align: right;">289</p> <p>1 They, they try to in polling 2 predict a certain turnout of different racial 3 groups and try to -- when they do a sample. 4 And then they see how you do with that sample. 5 So, for example, if my district, whatever the 6 number you said, if it was 35 percent 7 African-American vote last time I ran, they 8 would do a similar poll with that similar 9 sample in there to see how I poll. 10 I don't know if that's what this is 11 about, but I believe Landmark Communications 12 was doing polling for me in '16. 13 Q And are they generally a 14 Republican-oriented polling -- 15 A I don't know. 16 Q -- company? 17 A I really don't know. 18 Q But you think this is the result of 19 polling that they -- "this" being this email? 20 A Well, I -- 21 Q -- result of polling done for you? 22 A I'm truly -- I'm speculating. I 23 just know they were a polling group that I 24 think, I think was doing polling in 2016 for 25 me. But I'm completely speculating. I've</p>
<p style="text-align: right;">288</p> <p>1 to would be the efforts of registering new 2 voters in certain districts they were 3 targeting. It's a good strategy politically. 4 (Whereupon a document was identified as 5 Plaintiff's Exhibit 288.) 6 Q I'd like to ask you to look at 7 another document. This one, I marked as 8 Exhibit 288. And this document is a multipage 9 document with the beginning -- the first page 10 bearing Bates number GA2-001237. 11 And the first page, it appears to 12 consist of an email chain. The latest of the 13 emails is dated October 28th, 2016. It's from 14 Mr. O'Connor to a Mike Seigle, and the subject 15 is, Need old racial breakdown for old HS 111 16 in 2012 and 2014. Have you seen this document 17 before? 18 A No. 19 Q Do you know who Mike Seigle is? 20 A No, but the -- it says at @Landmark 21 Communications. Landmark Communication 22 does -- they do polling. And so I, I think 23 they were doing polling for my race in 2016, 24 and so part of the polling may have been going 25 through and -- I don't know.</p>	<p style="text-align: right;">290</p> <p>1 never seen the email. I don't -- I recognize 2 the name Mike Siegel, but I don't know who he 3 is. 4 Q And then for -- if you look at the 5 email beginning with the "2012 and 2014 data 6 immediately below" -- 7 A Yes. 8 Q -- the first paragraph, it says the 9 data immediately below will be for the old 10 District 111, boundaries for the 2012 and 2014 11 election cycles before the 2015 tweaking. 12 And then it appears that 13 Mr. O'Connor has provide -- provides them the 14 proportion or the percentages of voters by 15 race or ethnicity for a period from 16 November -- for different periods for the 17 period November 12th -- november 2012 up until 18 October 2016; is that correct? 19 A It, it appears. I don't know where 20 this number comes from. This is in October 21 2016. Early voting was underway. My guess is 22 they were trying to project who was voting 23 early because, again, this is the year that 24 there was the big Stacey Abrams effort to get 25 as many Democrats to vote in Henry County as</p>

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<p style="text-align: right;">291</p> <p>1 possible.</p> <p>2 And they did that by focusing</p> <p>3 solely on black voters, and so I'm assuming</p> <p>4 that's what this is. Though it -- if that's</p> <p>5 the case, I did very, very well with</p> <p>6 African-American voters that year, better than</p> <p>7 in the past, if this -- these are the correct</p> <p>8 numbers.</p> <p>9 Q Do you agree or do you have any</p> <p>10 reason to disagree with the numbers that are</p> <p>11 reported in this email with regard to the</p> <p>12 active registered voters and the breakdown of</p> <p>13 those voters?</p> <p>14 A I have to say yes because I don't</p> <p>15 know, and so I have to disagree without being</p> <p>16 able to confirm it.</p> <p>17 Q But you don't have any information</p> <p>18 specific to these issues that leads you to</p> <p>19 believe that?</p> <p>20 A I don't -- I don't know anything</p> <p>21 about it. I mean, I -- I don't remember any</p> <p>22 of the -- I'm not -- I don't remember if I</p> <p>23 ever heard these numbers as votes were coming</p> <p>24 in. I don't recall. I just don't recall them</p> <p>25 giving me this kind of data.</p>	<p style="text-align: right;">293</p> <p>1 (Proceedings in recess, 3:42 p.m. to</p> <p>2 3:53 p.m.)</p> <p>3 THE VIDEOGRAPHER: We're back on</p> <p>4 the video record at 3:53 p.m.</p> <p>5 (Whereupon a document was identified</p> <p>6 as Plaintiff's Exhibit 289.)</p> <p>7 Q Senator, I'm going to mark and show</p> <p>8 you an exhibit marked for identification as</p> <p>9 289 that bears Bates number GA2-000666. And</p> <p>10 this document is a one-page document. It</p> <p>11 is -- appears to be from Mr. O'Connor to Ronny</p> <p>12 D. Just dated June 12, 2015, regarding changes</p> <p>13 coming to State House districts in Hall</p> <p>14 County.</p> <p>15 A Okay.</p> <p>16 Q Have you seen this document before?</p> <p>17 A No.</p> <p>18 Q Do you know who Mr. Ronny Just is?</p> <p>19 A Never heard of him.</p> <p>20 Q Do you know anything about -- his</p> <p>21 email indicates @southernco. Do you have --</p> <p>22 does that ring any bells?</p> <p>23 A No. I'm assuming it's Southern</p> <p>24 Company, but I don't -- they're a large -- you</p> <p>25 probably know who they are, large company here</p>
<p style="text-align: right;">292</p> <p>1 When you're a candidate in a race,</p> <p>2 you're told to stay on the ground, knock on</p> <p>3 doors, and keep working. So I wasn't even</p> <p>4 given all the polling data.</p> <p>5 Q So I take it you didn't ask</p> <p>6 Mr. O'Connor for this data?</p> <p>7 A No. I've never had any -- my</p> <p>8 relationship with Mr. O'Connor is limited to</p> <p>9 seeing him in the hall going to the restroom,</p> <p>10 and that's just -- I just don't -- I don't</p> <p>11 have any relationship with him outside of</p> <p>12 that.</p> <p>13 I would -- personally wouldn't also</p> <p>14 consider the Reapportionment Office a resource</p> <p>15 during a campaign, honestly. I think it's</p> <p>16 just not what I would personally do.</p> <p>17 MR. PHILLIPS: Okay. Let me ask</p> <p>18 you -- actually, may I suggest we take a</p> <p>19 five-minute break here. I would like to go</p> <p>20 through the outline.</p> <p>21 MR. KHOURY: Sure.</p> <p>22 MR. PHILLIPS: But let me go off</p> <p>23 the record first.</p> <p>24 THE VIDEOGRAPHER: Going off the</p> <p>25 video record at 3:42 p.m.</p>	<p style="text-align: right;">294</p> <p>1 based in Atlanta. But I don't know -- I don't</p> <p>2 know who he is or why he would be asking about</p> <p>3 the districts.</p> <p>4 Q Okay. And then Mr. O'Connor in the</p> <p>5 second paragraph, he starts off the second</p> <p>6 paragraph by saying, "There were a few</p> <p>7 Republicans that got 'helped' by the</p> <p>8 redistricting (in terms of Democratic</p> <p>9 competition)."</p> <p>10 And he mentions a couple of</p> <p>11 districts. And then he says, "And in Henry</p> <p>12 County" -- that's the third sentence. "And in</p> <p>13 Henry County, HD 111 (Brian Strickland) got</p> <p>14 more Republican by exchanging precincts with</p> <p>15 some other GOPers in the area." Do you agree</p> <p>16 with that statement?</p> <p>17 A No.</p> <p>18 Q And then the next sentence is,</p> <p>19 "Both HD 105 and 111 are about 50-50 splits</p> <p>20 right now (redistricting) with the large</p> <p>21 minority increase in both Gwinnett and Henry,"</p> <p>22 et cetera. Do you see that?</p> <p>23 A Yes.</p> <p>24 Q Was it -- is it correct that as of</p> <p>25 June of 2015 your precinct was split between</p>

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<p style="text-align: right;">295</p> <p>1 Republican and Democrats about 50-50?</p> <p>2 A No.</p> <p>3 Q How, how -- what do you believe it</p> <p>4 was split, or what do you believe the split</p> <p>5 was?</p> <p>6 A I don't know. The only way I can</p> <p>7 judge is by the votes I got.</p> <p>8 Q Okay.</p> <p>9 A So mine was not a 50-50 tie, so I</p> <p>10 know it can't be 50-50. And that's assuming</p> <p>11 Republicans all voted for me and Democrats all</p> <p>12 voted for my opponent, which is obviously not</p> <p>13 the case either.</p> <p>14 So I don't know if there's any way</p> <p>15 to know what the GOPers, that's another he --</p> <p>16 what the GOP or Republican-Democrat breakdown</p> <p>17 would be. You would have to make way too many</p> <p>18 assumptions.</p> <p>19 Q Do you have any -- do you know what</p> <p>20 Mr. -- well, strike that.</p> <p>21 And then he says it's about 50-50</p> <p>22 splits right now. And then he says, "with the</p> <p>23 large minority increase in both Gwinnett and</p> <p>24 Henry County."</p> <p>25 Do you have an understanding as to</p>	<p style="text-align: right;">297</p> <p>1 A Yeah. I'm trying to find the</p> <p>2 number. We talked about it earlier. But</p> <p>3 based on the other emails, I would say there</p> <p>4 was a larger number of registered new black</p> <p>5 voters compared to white, a 2-to-1, I guess</p> <p>6 you would say, 2,000 to 1,000.</p> <p>7 But I don't know what -- I would</p> <p>8 attribute that to the success of the new voter</p> <p>9 project. I forget what it was called. But</p> <p>10 there was initiative that was led by Abrams,</p> <p>11 Stacey Abrams, to register new black voters in</p> <p>12 Henry County and other counties as well, and</p> <p>13 so I would give her some credit for that.</p> <p>14 Q Would you agree that the -- at</p> <p>15 least the majority, whatever percentage, but a</p> <p>16 majority, of the new black registered voters</p> <p>17 would tend to be Democratic voters?</p> <p>18 A No.</p> <p>19 Q Even though they were registered by</p> <p>20 a Democratic organization?</p> <p>21 A Yeah. I think the organization has</p> <p>22 a big flaw in their model, and that's why</p> <p>23 they've lost every race they tried to engage</p> <p>24 in.</p> <p>25 Q Do you believe that the changes to</p>
<p style="text-align: right;">296</p> <p>1 why he makes that statement in connection with</p> <p>2 the 50-50 splits that he references?</p> <p>3 A No. All I can assume is that he's</p> <p>4 talking about voter registration, which you'd</p> <p>5 have to know a year in advance it's going to</p> <p>6 happen because you showed me a document that</p> <p>7 showed in '16 there was a high number of new</p> <p>8 voters registered that were African-American</p> <p>9 according to this. But I don't know what he's</p> <p>10 talking about.</p> <p>11 Q Would you agree that the large</p> <p>12 minority increase in -- do you agree that</p> <p>13 there was a large minority increase in Henry</p> <p>14 County?</p> <p>15 A Depends on what you mean by that.</p> <p>16 New voters or new people moving in?</p> <p>17 Q Either one.</p> <p>18 A I don't know. But apparently in</p> <p>19 '16, if this is correct, Exhibit 288, there</p> <p>20 were 2,000 new black voters registered and a</p> <p>21 thousand -- I think this is the document I saw</p> <p>22 this on. There was a document I saw 2,000 and</p> <p>23 a thousand figure new registered voters.</p> <p>24 Q I do recall what you were referring</p> <p>25 to.</p>	<p style="text-align: right;">298</p> <p>1 House District 105 -- excuse me, 111 diluted</p> <p>2 the strength of the African-American vote in</p> <p>3 that district, in your district?</p> <p>4 A No. And apparently, it did the</p> <p>5 opposite.</p> <p>6 Q Let me -- strike that.</p> <p>7 Do you believe that your district</p> <p>8 has trended between the period 2012 to the</p> <p>9 present more Democratic in recent years than</p> <p>10 Districts HD 109 and HD 110?</p> <p>11 A No.</p> <p>12 Q Do you believe that Henry has</p> <p>13 been -- Henry County has been trend -- not</p> <p>14 just your precinct, but Henry County as a</p> <p>15 whole, has been trending Democratic during the</p> <p>16 last ten years?</p> <p>17 A No. The only, the only thing</p> <p>18 countywide that I recall went Democrat was the</p> <p>19 presidential race of 2016. But Republicans</p> <p>20 had a very interesting candidate, as we know,</p> <p>21 in that race. And I don't think you can</p> <p>22 attribute that to anything except the</p> <p>23 personalities of the two candidates.</p> <p>24 (Whereupon a document was identified as</p> <p>25 Plaintiff's Exhibit 290.)</p>

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<p style="text-align: right;">299</p> <p>1 Q I just want to show you very</p> <p>2 briefly a document which I'd like to mark as</p> <p>3 Exhibit 290, and this is a document with a --</p> <p>4 multipage document with the first page bearing</p> <p>5 Bates number GA2-000701. And it appears to be</p> <p>6 an email from Mr. O'Connor to Mr. Seigle.</p> <p>7 Subject matter: Is there a good map that</p> <p>8 shows the changes in district lines this year?</p> <p>9 Do you recall seeing this document</p> <p>10 before?</p> <p>11 A No. It looks similar to the other</p> <p>12 one you showed me, but I don't recall this.</p> <p>13 Q Yeah. And then if you look to the</p> <p>14 three pages which begin with page GA2-000703,</p> <p>15 do you recall seeing these documents or</p> <p>16 documents similar to this before?</p> <p>17 A No. I mean, the first page is a</p> <p>18 map. I don't know where it came from, but</p> <p>19 I've seen maps in my district, obviously. But</p> <p>20 I have not seen these documents before, unless</p> <p>21 there was something you handed me earlier.</p> <p>22 They look very familiar. It may</p> <p>23 have been some the same documents in earlier</p> <p>24 exhibits, so I'll make it easy. Other than</p> <p>25 sitting here today, I have not seen these</p>	<p style="text-align: right;">301</p> <p>1 A That's what it appears to say.</p> <p>2 Q I'm sorry.</p> <p>3 A That's what it appears to say, yes.</p> <p>4 Q Do you have any reason to doubt this</p> <p>5 information?</p> <p>6 A I do now.</p> <p>7 Q And what is that basis?</p> <p>8 A It conflicts with the other numbers</p> <p>9 Mr. O'Connor provided that showed the voter</p> <p>10 registration for African-American is much</p> <p>11 higher in 2016.</p> <p>12 Q So you believe that there was not a</p> <p>13 reduction, as Mr. O'Connor states, of three</p> <p>14 percent --</p> <p>15 A Well --</p> <p>16 Q -- in black percentages?</p> <p>17 A -- all I know is Mr. O'Connor</p> <p>18 reports two different things that conflict with</p> <p>19 each other, so I don't know which one is true.</p> <p>20 Q Oh. Mr. O'Connor says in the</p> <p>21 sentence I read previously in the first</p> <p>22 paragraph, he says, "Of course with 111 running</p> <p>23 along I-75, it has trended more Democratic in</p> <p>24 recent years."</p> <p>25 Do you know what is it -- is there</p>
<p style="text-align: right;">300</p> <p>1 before.</p> <p>2 Q And I am not representing that you</p> <p>3 have.</p> <p>4 A Okay.</p> <p>5 Q I'm just --</p> <p>6 A Yeah.</p> <p>7 Q So if you look at the information on</p> <p>8 the bottom of the page, the first page of the</p> <p>9 document.</p> <p>10 A Okay.</p> <p>11 Q Under the heading Black Voter</p> <p>12 Registration (2014 Cycle)?</p> <p>13 A Yes.</p> <p>14 Q And there are two columns, Old</p> <p>15 Map -- the headings of which are Old Map and</p> <p>16 New Map. Do you see that?</p> <p>17 A Yes.</p> <p>18 Q And it says under the -- your House</p> <p>19 District, 111, that the old map, and it's very</p> <p>20 poorly represented here, I believe, but the old</p> <p>21 map is 37 percent black voter registration.</p> <p>22 And under the new map, the 2015 map, it's 34</p> <p>23 percent. Do you see that?</p> <p>24 A Yes.</p> <p>25 Q And --</p>	<p style="text-align: right;">302</p> <p>1 something about -- I-75, I assume, is</p> <p>2 Interstate 75; is that correct?</p> <p>3 A Correct.</p> <p>4 Q Is there some -- what is the reason,</p> <p>5 if any, that he references or that you believe</p> <p>6 he made reference to I-75 as seemingly causing</p> <p>7 a trend toward more Democratic voters?</p> <p>8 A I have no idea. The only thing I</p> <p>9 can speculate is that there's this general</p> <p>10 argument that Democrat party is making gains in</p> <p>11 metro Atlanta following along the interstates,</p> <p>12 but that has been proven not to be the case.</p> <p>13 So I'm assuming he's referring to</p> <p>14 that, but he's making assumptions that in 2016</p> <p>15 were proven to be incorrect.</p> <p>16 Q Do you think they were more true,</p> <p>17 the assumptions would have been more accurate</p> <p>18 prior to 2016 with regard to this comment about</p> <p>19 by I-75?</p> <p>20 A Oh, I think it was an argument you</p> <p>21 heard then. But in 2016, Henry County, other</p> <p>22 than the Trump-Hillary race, and maybe it was</p> <p>23 just people not voting based on how they</p> <p>24 historically voted, but we saw countywide every</p> <p>25 other -- every Republican won everything.</p>

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<p style="text-align: right;">303</p> <p>1 And we saw -- and you can argue a</p> <p>2 Republican increase in 2016 in the county when</p> <p>3 you had a chairmanship where a Republican did</p> <p>4 very well. She won 67 percent in a runoff.</p> <p>5 And every countywide race that people like</p> <p>6 Mr. O'Connor, who make these predictions, were</p> <p>7 all wrong because everything went Republican.</p> <p>8 Q Mr. O'Connor refers to the black</p> <p>9 voter regis -- black voter registration.</p> <p>10 Nowhere on this email in talking about voter</p> <p>11 registration does he refer to changes in</p> <p>12 registration by party. Would you agree with</p> <p>13 that?</p> <p>14 A No.</p> <p>15 Q Where would --</p> <p>16 A You pointed to at the bottom of this</p> <p>17 email an old map versus new map number.</p> <p>18 Q Yes.</p> <p>19 A And you said that -- oh, I'm not</p> <p>20 putting words in your mouth, but he seemed to</p> <p>21 imply that the changes made the number of</p> <p>22 African-Americans I'm assuming register in the</p> <p>23 district, I'm not making assumptions here, I</p> <p>24 don't know what these numbers are, go down</p> <p>25 three points.</p>	<p style="text-align: right;">305</p> <p>1 on race. And so that's the conversation people</p> <p>2 have, so it forces the other side, assume</p> <p>3 Mr. O'Connor wants Republicans to win, I don't</p> <p>4 know what he wants, but it forces him to dive</p> <p>5 into racial numbers.</p> <p>6 It would be interesting to see if he</p> <p>7 gave similar numbers to Ms. Abrams as well.</p> <p>8 Q But would you agree that, whatever</p> <p>9 your views, and I recognize your views are</p> <p>10 different, but would you agree that there is a</p> <p>11 large proportion -- large numbers of people do</p> <p>12 believe that ethnicity and race do -- are an</p> <p>13 indication of party affiliation?</p> <p>14 MR. KHOURY: I'm going to object to</p> <p>15 the form of the question.</p> <p>16 A Yeah. I don't know what people</p> <p>17 believe, but they're wrong if they think that.</p> <p>18 Q But you haven't heard that?</p> <p>19 A I haven't heard what?</p> <p>20 Q That people, that many people</p> <p>21 believe that.</p> <p>22 A Have I heard that?</p> <p>23 Q Yes.</p> <p>24 A I don't --</p> <p>25 Q Okay.</p>
<p style="text-align: right;">304</p> <p>1 But that's -- he also reports later</p> <p>2 that that number went up three points or more.</p> <p>3 I think it may have been more, four points or</p> <p>4 five point, to 30 -- was it 39 percent he</p> <p>5 reported in -- at one point in '16 was the, was</p> <p>6 the number?</p> <p>7 But regardless, there's numbers all</p> <p>8 over the place.</p> <p>9 Q But in each case, he's referring to</p> <p>10 not Democratic versus Republican. He's</p> <p>11 referring to black voters or minority voters.</p> <p>12 A Yes.</p> <p>13 Q Correct?</p> <p>14 A As he did earlier too.</p> <p>15 Q Right. And is there a reason that</p> <p>16 you're aware of why he would focus or anybody</p> <p>17 would focus on minority group registration as</p> <p>18 opposed to registration by particular party?</p> <p>19 A Sure. Because it is the prevailing</p> <p>20 view by a lot of groups that elections are</p> <p>21 driven by race, which is why Stacey Abrams</p> <p>22 focused solely on race in 2016 in House</p> <p>23 District 111 in Henry County.</p> <p>24 And no offense to you, but groups</p> <p>25 like the ones bringing this suit focus solely</p>	<p style="text-align: right;">306</p> <p>1 A -- know. I mean, I don't, I don't</p> <p>2 generally discuss race. One of the benefits of</p> <p>3 my district is I have a very diverse district.</p> <p>4 It doesn't matter which number you believe.</p> <p>5 It's a diverse district, which is great, and we</p> <p>6 get along pretty well.</p> <p>7 Q Sorry. I'm skipping through.</p> <p>8 A That's okay. I like you skipping.</p> <p>9 I don't think anybody's going to argue.</p> <p>10 (Whereupon a document was identified</p> <p>11 as Plaintiff's Exhibit 291.)</p> <p>12 Q I have eliminated quite a bit of the</p> <p>13 outline, so.</p> <p>14 Let me ask you to look at a document</p> <p>15 with -- which I'm going to mark at Exhibit 291.</p> <p>16 And then this is a document with beginning</p> <p>17 Bates number GA2-001201. And it is -- and it</p> <p>18 appears to be an email from Mr. O'Connor to</p> <p>19 Jeremy Brand regarding HD 106, and there's a --</p> <p>20 it's part of a string of emails. Do you see</p> <p>21 this --</p> <p>22 A Yes.</p> <p>23 Q -- document? And is it correct --</p> <p>24 well, have you seen this before?</p> <p>25 A No.</p>

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<p style="text-align: right;">307</p> <p>1 Q Do you know who Jeremy Brand is?</p> <p>2 A Yes.</p> <p>3 Q Who is he?</p> <p>4 A He's a political consultant that</p> <p>5 people hire for campaigns.</p> <p>6 Q Is he focused on Republican party</p> <p>7 races, or do you know?</p> <p>8 A I don't know. As far as I know, I</p> <p>9 know people that have used him. I used him my</p> <p>10 very first race when I ran in 2012, but I have</p> <p>11 not used him since.</p> <p>12 Q Is there a particular reason why you</p> <p>13 haven't used him?</p> <p>14 A I just wanted to go with someone</p> <p>15 local, honestly. It was a preference, a</p> <p>16 personality preference.</p> <p>17 Q And if you could look at the subject</p> <p>18 page, Bates labeled GA2-001202?</p> <p>19 A Uh-huh (affirmative).</p> <p>20 Q And this, I'm not sure I said this</p> <p>21 before, but it's a document dated November 8th,</p> <p>22 2016. And that's, of course, after the passage</p> <p>23 of HB 566; correct?</p> <p>24 A Yes.</p> <p>25 Q In the penultimate paragraph, it</p>	<p style="text-align: right;">309</p> <p>1 mentioned?</p> <p>2 A No.</p> <p>3 Q I'm sorry?</p> <p>4 A No.</p> <p>5 Q You don't have -- you don't have</p> <p>6 that understanding, or you disagree?</p> <p>7 A I don't have that understanding as</p> <p>8 I've never seen -- I've never seen those</p> <p>9 numbers, honestly. I've never -- the only</p> <p>10 numbers I've seen on registration is what you</p> <p>11 showed me. And I'm assuming that Mr. O'Connor</p> <p>12 is correct, but I don't know if he is because</p> <p>13 he's all over the place.</p> <p>14 But assuming he is correct and there</p> <p>15 was 2,000 new registered voters in 2016, and I</p> <p>16 do believe that just because there was that big</p> <p>17 voter drive that focused solely on black</p> <p>18 voters, then the argument that suddenly it's</p> <p>19 way up in November of '16 would be correct</p> <p>20 compared to March of '16.</p> <p>21 But there was an election in</p> <p>22 November of '16, and those same new voters</p> <p>23 voted for Republicans countywide.</p> <p>24 Q Just a couple more pages of the</p> <p>25 outline.</p>
<p style="text-align: right;">308</p> <p>1 says, "Henry County is seeing a similar trend,</p> <p>2 like in Brian Strickland's HD 111 along I-75.</p> <p>3 White registration in Henry has -- Henry has</p> <p>4 changed little in the last dozen years, but</p> <p>5 black registration is way up, to the point that</p> <p>6 there's no majority race in Henry anymore --</p> <p>7 latest count," et cetera.</p> <p>8 Do you agree with the statement that</p> <p>9 black registration in Henry County has -- is</p> <p>10 way up as opposed to previous years as of 2016,</p> <p>11 November 2016?</p> <p>12 A As of November 2016?</p> <p>13 Q Yes.</p> <p>14 A No, but I will say this. If the</p> <p>15 numbers he reported previously about the</p> <p>16 registration that happened between March and</p> <p>17 October of 2016 are correct, then it would have</p> <p>18 been 2,000 new black registered voters versus</p> <p>19 1,000 white new registered voters.</p> <p>20 And that would obviously be a good</p> <p>21 jump, but I know, again, why that happened.</p> <p>22 Q Do you have any understanding as to</p> <p>23 whether the increase in black registration --</p> <p>24 there was a increase in black registration</p> <p>25 trending up at least prior to the race that you</p>	<p style="text-align: right;">310</p> <p>1 A Okay.</p> <p>2 (Whereupon a document was identified as</p> <p>3 Plaintiff's Exhibit 292).</p> <p>4 Q I'm trying to, trying to be</p> <p>5 efficient.</p> <p>6 I'm going to show you Plaintiff's --</p> <p>7 or strike that.</p> <p>8 I'm going to show you an document</p> <p>9 which I'm marking for identification as Exhibit</p> <p>10 2 -- excuse me, 292.</p> <p>11 A Okay.</p> <p>12 Q It bears Bates number on the first</p> <p>13 page GA2-002106.</p> <p>14 This document is a one-page --</p> <p>15 excuse me, a multipage document which on the</p> <p>16 first page appears to be an email from</p> <p>17 Mr. O'Connor dated January 20th, 2017. It is</p> <p>18 to Spiro Amburn with copies to Mr. Childs and</p> <p>19 Mr. Jordan, and it says, Follow-Up, Explanation</p> <p>20 of Clinton Wins in GOP State House Districts.</p> <p>21 See that?</p> <p>22 A Yes.</p> <p>23 Q And in the -- he attaches to this</p> <p>24 document a -- to the email, that is, a document</p> <p>25 entitled 2017 -- Republican-Held (or</p>

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<p style="text-align: right;">311</p> <p>1 Previously-Held) State House Districts that</p> <p>2 Backed Clinton over Trump -- Analysis; is that</p> <p>3 correct?</p> <p>4 A That's what it appears to be.</p> <p>5 Q Do you know, if you look in the body</p> <p>6 of the email, do you agree that -- well, strike</p> <p>7 that.</p> <p>8 Was HD 111, your district, in fact</p> <p>9 one of the 13 GOP-held districts that went for</p> <p>10 Ms. Clinton?</p> <p>11 A I believe that's correct because I</p> <p>12 saw that she did really well in the precincts I</p> <p>13 looked at. Never saw the overall numbers</p> <p>14 locally, but I believe that is correct.</p> <p>15 Q Then if you can turn to the last</p> <p>16 page of the exhibit bearing Bates number 2109,</p> <p>17 and if you could look at the paragraph which is</p> <p>18 headed District 111, if you could just read</p> <p>19 that to yourself for a moment.</p> <p>20 A Yes.</p> <p>21 Q And it's again about your</p> <p>22 District 111, of course. He again states</p> <p>23 that -- well, in this case, he says, "Brian</p> <p>24 Strickland (I-75 corridor in Henry). Henry</p> <p>25 County overall has moved toward the Democrats</p>	<p style="text-align: right;">313</p> <p>1 And Donald Trump was never going to</p> <p>2 win in Henry County for a lot of reasons.</p> <p>3 Q Okay. Do you think you could have</p> <p>4 won in 2016 in District 111 without the changes</p> <p>5 that were made in 2015?</p> <p>6 A Yes, and I think I actually would</p> <p>7 have done better. And we'll never know. We</p> <p>8 can disagree and debate that, but I'm basing</p> <p>9 that on the new voter registration that was</p> <p>10 done by the Stacey Abrams-George Soros group</p> <p>11 that focused on the new district.</p> <p>12 And the numbers, if Mr. O'Connor's</p> <p>13 correct, that would show that they were able to</p> <p>14 get a lot more black voters. Of course, that</p> <p>15 backfired because they still voted for me. But</p> <p>16 I think that I probably could have done better,</p> <p>17 and I'm basing that simply on the fact that I</p> <p>18 would have had the same voters I had before</p> <p>19 versus dealing with new areas where they were</p> <p>20 able to go in and register new people.</p> <p>21 Q I just wanted to ask you a very few</p> <p>22 more questions.</p> <p>23 A Okay.</p> <p>24 Q We're almost finished. This is</p> <p>25 regarding the decision -- your decision to run</p>
<p style="text-align: right;">312</p> <p>1 over the last ten years."</p> <p>2 And then there's some information</p> <p>3 about presidential races. And then after a</p> <p>4 comment about Clinton carrying 111 by 54 --</p> <p>5 50-to-47 margin, percent margin, over Trump, he</p> <p>6 states, "Strickland won with just 52 percent</p> <p>7 last fall, but that was still an accomplishment</p> <p>8 in a district now 38 percent black in voter</p> <p>9 registration." See that?</p> <p>10 A Uh-huh (affirmative).</p> <p>11 Q Would you agree that your winning in</p> <p>12 2016 was an accomplishment because House</p> <p>13 District 111 has a 38 percent black in voter</p> <p>14 registration?</p> <p>15 A No, not for that reason alone.</p> <p>16 Well, you know what? If we take the premise</p> <p>17 that black people only vote for Democrats, then</p> <p>18 that would be a major accomplishment.</p> <p>19 Q But you disagree with that?</p> <p>20 A I completely disagree with that, and</p> <p>21 the numbers show it. And he's also wrong that</p> <p>22 we moved towards Democrats as a county.</p> <p>23 There's only one Democrat that I'm aware that's</p> <p>24 ever won in Henry County, and that was Hillary</p> <p>25 Clinton.</p>	<p style="text-align: right;">314</p> <p>1 for the Senate.</p> <p>2 A Yes.</p> <p>3 Q Perhaps you could just tell me why</p> <p>4 you made that decision.</p> <p>5 A Because there was an open seat and I</p> <p>6 wanted to go to the Senate. I get tired of</p> <p>7 being in one place too long. There are people</p> <p>8 that have been in the House of Representatives</p> <p>9 for 20, 30 years or even 10 years, and I</p> <p>10 couldn't imagine sitting anywhere that long.</p> <p>11 Q Do you -- was any part of your</p> <p>12 decision to run for the Senate as opposed to</p> <p>13 run again for Georgia Senate -- excuse me, your</p> <p>14 House District 2 -- 111 due to the number of</p> <p>15 African-American people --</p> <p>16 A No.</p> <p>17 Q -- in the district? And did you,</p> <p>18 did you run for the Senate seat which had been</p> <p>19 vacated by a former senator? And I</p> <p>20 apologize for mispronouncing --</p> <p>21 A You won't say it right. Even if</p> <p>22 you're from here, you wouldn't say it right.</p> <p>23 Q It's Jeffares?</p> <p>24 A You're close. Jeffares. I'm not</p> <p>25 sure why it's pronounced that way, but it is.</p>

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<p style="text-align: right;">315</p> <p>1 Q Senator Jeffares.</p> <p>2 A They call him Jeffares in Locust</p> <p>3 Grove too, so it's okay.</p> <p>4 Q Did you run for this Senator</p> <p>5 Jeffares' seat in part because that Senate</p> <p>6 district chose Donald Trump instead of Hillary</p> <p>7 Clinton, whereas District 111 did not?</p> <p>8 A No, but it's -- if you have the</p> <p>9 number of people that asked me how Donald Trump</p> <p>10 did in the Senate district, I have no idea. I</p> <p>11 didn't know whether or not he had won it. I</p> <p>12 know that when I ran for the seat last month, I</p> <p>13 was targeted again by some of the same people</p> <p>14 that targeted me in 111.</p> <p>15 And it's just people trying to make</p> <p>16 it political and trying to say you can't elect</p> <p>17 a Republican. And we had the same issues going</p> <p>18 on there that happened in 111, so it's the</p> <p>19 same, same fight I'll have there too.</p> <p>20 Q And I'd just like to walk -- and</p> <p>21 this will be the final exhibit that I mark,</p> <p>22 which I'm sure you'll be disappointed to hear.</p> <p>23 THE VIDEOGRAPHER: Five minutes</p> <p>24 left.</p> <p>25 MR. PHILLIPS: I'm sorry, I'm</p>	<p style="text-align: right;">317</p> <p>1 member of the House of Representatives in 2017?</p> <p>2 A Until December of 2017, yes.</p> <p>3 Q And there is a string of emails.</p> <p>4 And if you look at the top of page 53, of Bates</p> <p>5 numbered 53, you'll see an email dated December</p> <p>6 14th, 2016, O'Connor to -- O'Connor email, I</p> <p>7 believe, to Mr. Harvill-Childs.</p> <p>8 He says, "With regard to Brian," who</p> <p>9 I presume though cannot really represent to</p> <p>10 you, but I believe it is a reference to you,</p> <p>11 "someone mentioned to me what he might do some</p> <p>12 day is run for Jeffares' seat when he</p> <p>13 retires -- his Senate district backed Trump</p> <p>14 last month (though even there his district is</p> <p>15 not as Republican as it used to be, mainly</p> <p>16 because of the Henry portion became more</p> <p>17 heavily black)."</p> <p>18 Do you agree with the statement that</p> <p>19 it was mainly because of the Henry portion</p> <p>20 becoming more heavily black that Mr. -- or</p> <p>21 Senator Jeffares' seat was not as Republican as</p> <p>22 it used to be?</p> <p>23 A No. You know, the back story there</p> <p>24 is Senator Jeffares decided in 2016 when he ran</p> <p>25 that he would just put a few signs up and</p>
<p style="text-align: right;">316</p> <p>1 having -- could we go off the record for a</p> <p>2 second?</p> <p>3 THE VIDEOGRAPHER: Going off the</p> <p>4 video record at 4:21 p.m.</p> <p>5 (Proceedings in recess, 4:21 p.m. to</p> <p>6 4:22 p.m.)</p> <p>7 THE VIDEOGRAPHER: We're back on the</p> <p>8 video record at 4:22 p.m.</p> <p>9 (Whereupon a document was identified as</p> <p>10 Plaintiff's Exhibit 293.)</p> <p>11 Q Thanks for your patience, Senator.</p> <p>12 I want to show you a document that</p> <p>13 I've marked for identification as Exhibit 293.</p> <p>14 The beginning Bates number of this document is</p> <p>15 GA2-000052.</p> <p>16 And, once again, as in so many of</p> <p>17 the emails we've seen, you are not copied or</p> <p>18 the recipient or author of any of the emails in</p> <p>19 this string. It appears to be an email string</p> <p>20 between Caulder Harvill-Childs and Dan O'Connor</p> <p>21 dated January 5th in the, the last email, the</p> <p>22 first on the page 052 of the string.</p> <p>23 It is dated January 5th, 2017, and</p> <p>24 it's regarding the 2017 session meeting. And</p> <p>25 it's correct, is it not, that you were still a</p>	<p style="text-align: right;">318</p> <p>1 didn't even care. And he had someone working</p> <p>2 for him who went precinct by precinct after the</p> <p>3 election and compared his numbers to my numbers</p> <p>4 where we overlapped.</p> <p>5 And I consistently got 50 to a</p> <p>6 hundred votes more than he did by the precinct.</p> <p>7 And I told him later he should have worked for</p> <p>8 it if he wanted to get more votes.</p> <p>9 Q The next sentence is, after the one</p> <p>10 I just read, it says, "Brian has been</p> <p>11 consistent in performance -- 53 percent in 2012</p> <p>12 and 2014 and 52 percent last month."</p> <p>13 And then he goes on to say, "If we</p> <p>14 had not tweaked his district last year, he</p> <p>15 probably would have lost this time."</p> <p>16 Do you agree with Mr. O'Connor's</p> <p>17 statement?</p> <p>18 A No. I think he's wrong.</p> <p>19 Q And I think we've already</p> <p>20 discussed --</p> <p>21 A That's right.</p> <p>22 Q -- your views on that, is that</p> <p>23 correct, as to why he was --</p> <p>24 A Yeah. Mr. O'Connor bases everything</p> <p>25 on numbers, but it's just a complete flawed</p>

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<p style="text-align: right;">319</p> <p>1 model the way he looks at this, so I completely 2 disagree with him. 3 Q The last comment on the page is that 4 Henry has a lot of large precincts. Is that 5 correct? 6 A I don't know what to compare it to. 7 I've never looked at precincts beyond Henry 8 until this time around, and I thought they were 9 pretty consistent in Newton and Rockdale too, 10 so -- in my Senate race. So, no, I don't -- I 11 don't know that to be the case. I don't know. 12 THE VIDEOGRAPHER: Two minutes. 13 MR. PHILLIPS: I have no more 14 questions. 15 THE WITNESS: Okay. 16 MR. PHILLIPS: Thank you. 17 MR. KHOURY: All right. 18 MR. PHILLIPS: I appreciate the time 19 we've spent. 20 THE WITNESS: Thank you. 21 MR. KHOURY: Thank you. And we 22 appreciate you trying to expedite things to 23 help us out. 24 MR. PHILLIPS: Did my best. 25 MR. KHOURY: Thank you.</p>	<p style="text-align: right;">321</p> <p>1 I, R. BRIAN STRICKLAND, Deponent, 2 do hereby certify that I have read the 3 foregoing deposition, and the same is a true 4 and accurate transcript of my testimony, except 5 for the changes listed below, if any. 6 PAGE/LINE/CHANGE REASON 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 If additional space is needed, please attach 21 separate sheet(s) and indicate number of 22 additional page(s) here: _____ 23 R. BRIAN STRICKLAND, Deponent 24 This _____ day of _____, 20____. 25 Donovan Reporting, PC FAX: 770-428-5801 237 Roswell Street Marietta, GA 30060 Date of Deposition: 1-26-2018 CR: JM</p>
<p style="text-align: right;">320</p> <p>1 THE VIDEOGRAPHER: Going off the 2 video record at 4:27 p.m. 3 MR. KHOURY: All right. 4 THE COURT REPORTER: And you're 5 going to reserve signature? 6 MR. KHOURY: Yes. 7 (Proceedings adjourned, 4:27 p.m.) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">322</p> <p>1 CERTIFICATE OF COURT REPORTER 2 STATE OF GEORGIA 3 COUNTY OF COBB 4 I hereby certify that the foregoing 5 deposition was reported as stated in the 6 caption, and the questions and answers thereto 7 were reduced to writing by me; 8 That the witness's right to read and 9 sign the deposition was reserved; 10 That the foregoing pages 1 through 323 11 represent a true, correct, and complete 12 transcript of the evidence given on the 13 above-referenced date by the witness, R. BRIAN 14 STRICKLAND, who was first duly sworn by me; 15 That I am not of kin or counsel to any 16 of the attorneys or parties in this case. 17 I do hereby disclose pursuant to 18 Article 10.B. of the Rules and Regulations of 19 the Board of Court Reporting of the Judicial 20 Council of Georgia that I am a Georgia 21 Certified Court Reporter; that I am an employee 22 of Donovan Reporting PC; that Donovan 23 Reporting PC was contacted by the attorney 24 taking the deposition to provide court 25 reporting services for this deposition; that I</p>

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1 am not taking this deposition under any
2 contract that is prohibited by OCGA 15-14-37(a)
3 and (b) or Article 7.C. of the Rules and
4 Regulations of the Board; and I am not
5 disqualified for a relationship of interest
6 under OCGA 9-11-28(c).

7 There is no contract to provide
8 reporting services between myself or any person
9 with whom I have a principal and agency
10 relationship nor any attorney at law in this
11 action, party to this action, party having a
12 financial interest in this action, or agent for
13 an attorney at law in this action, party to
14 this action, or party having a financial
15 interest in this action. Any and all financial
16 arrangements beyond my usual and customary
17 rates have been disclosed and offered to all
18 parties.

19 This 2nd day of February 2018.

20

21


JOEL P. MOYER, CCR 2745
Certified Court Reporter

22

23

24

25

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