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

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| MATHIS K. WRIGHT, JR., | |
| Plaintiff, | |
| vs. | CIVIL ACTION |
| SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION, | FILE NO. 1:14-CV-42(WLS) |
| Defendant. | |

DEPOSITION OF

MATHIS KEARSE WRIGHT, JR.

Thursday, November 13, 2014

10:10 a.m.

SunTrust Bank Building, Fifth Floor

435 Second Street

Macon, Georgia

Linda C. Ruggeri, CCR-A-261

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| Exhibit 1 | Injunction to Stop March 18, 2014 and May 20, 2014 Sumter County School Elections | 35 |
| Exhibit 2 | Article entitled "Did NeSmith and Howard Make a Deal with a Law Firm for Several $Million?" Americus Sumter Observer | 76 |
| Exhibit 3 | Article entitled "Former County Attorney NeSmith Attacks Mathis Wright" Americus Sumter Observer | 84 |
| Exhibit 4 | Article entitled "White Commissioners Hire Republican Law Firm to Fight Black People" Americus Sumter Observer | 89 |
| Exhibit 5 | Letter - December 3, 2013 Bohling to Smith | 94 |
| Exhibit 6 | Plaintiff's Answers to Defendant's First Interrogatories | 111 |


(Original Exhibits 1 through 6 have been attached to the original transcript.)

(Reporter disclosure made pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia.)

MS. LEWIS: This will be the deposition of Mathis Wright, Jr., taken by the Defendant Sumter County Board of Elections and Registration, on cross-examination, for the purposes of discovery and all other purposes allowed by the Federal Rules of Civil Procedure and the Federal Rules of Evidence. All objections, except those going to the form of the question or the responsiveness of the answer, are reserved until such time as the deposition is used.

Is that agreeable?

MR. McDONALD: Yes.

MS. LEWIS: And Mr. Wright indicated before we -- let me ask you first, is Reverend Wright the correct address?

REVEREND WRIGHT: Either.

MS. LEWIS: I'm going to go with Reverend. Forgive me if I slip up and say Mr.

REVEREND WRIGHT: Mr. is fine. I was Mr. before I was Reverend, so that's fine.

MS. LEWIS: All right. Reverend Wright

said before the deposition that he'd like to read and sign the deposition after it's transcribed, and so we'll ask that you send it to him.

MATHIS KEARSE WRIGHT, JR.,

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

CROSS-EXAMINATION

BY MS. LEWIS:

**Q. Reverend Wright, we met when I came in the room; but let me tell you again, my name is Anne Lewis. With me is Bryan Tyson. We practice together in Atlanta at the firm of Strickland Brockington Lewis. We represent the Board of Elections and Registration in the lawsuit that you filed in the Middle District.**

**We're here today to ask questions about your lawsuit against the Board of Elections and to get additional information. The questions that I'm going to ask you aren't designed to trick you or try to trip you up. I'm just trying to find out some information from you. And I hope that if I ask a question that isn't clear to you you'll let me know so I can try to do a better job. Is that agreeable?**

A. That's agreeable.

**Q. All right. I have a tendency sometimes to**

**talk fast. And so if I talk too fast, tell me to slow down; and I promise you I'm going to do the same if you talk too fast. Okay?**

A. All right.

**Q. If you will, please be sure to say yes or no rather than -- we'll go off the record for one minute.**

**(Off the record.)**

**Q. (By Ms. Lewis) We're going to go back on the record. As we expected, Ms. Reid has arrived; and so as we introduced you when we were off the record, Ms. Reid represents the County. She is the county attorney for Sumter County.**

**I think we were getting to the fact that you need to say yes or no rather than nodding your head or saying uh-huh or huh-uh so we can have a clear record and it makes it a lot easier on the court reporter.**

**If you need to take a break at any time during the deposition, just let me know. The only thing I ask is that you answer the last question that was asked before we take a break.**

A. Okay.

**Q. Is that agreeable?**

A. That's agreeable.

**Q. All right. Will you state your full name for the record.**

A. Mathis Kearse Wright, Jr.

**Q. Have you ever gone by any other name other than that?**

A. No.

**Q. What's your date of birth?**

A. June 22nd, 1951.

**Q. And where were you born?**

A. In Sumter County, Georgia.

**Q. Have you lived in Sumter County your whole life?**

A. Almost.

**Q. All right. When did you not live in Sumter County?**

A. The first six months of my life. And then when I first got married, I lived in Charlotte briefly and Pennsylvania, Philadelphia, briefly; and then we came back to Americus, Georgia.

**Q. Where did you live the first six months of your life?**

A. Hartford, Connecticut.

**Q. Okay. Are you married now?**

A. Yes.

**Q. And what's your wife's name?**

A. Linda.

**Q. And how long have you been married?**

A. Forty-one years.

**Q. And I'm going to assume from that you have never been married other than to Linda?**

A. That's all.

**Q. All right. How many children do you have?**

A. Six.

**Q. And what are their age ranges from the oldest to the youngest?**

A. The oldest is 40; the youngest 30.

**Q. Do they all still live in Georgia or are they spread across the country?**

A. Three still live in Georgia and two in Texas, one in Fort Campbell, Kentucky.

**Q. Any live in Americus?**

A. No.

**Q. Reverend Wright, are you taking any medications that would prevent you from testifying fully and participating fully in your deposition today?**

A. No.

**Q. And is there any reason, any medical condition or any reason, that you couldn't participate fully in your deposition today?**

A. No.

**Q. Have you ever filed a lawsuit before the one we're here about?**

A. Yes.

**Q. Okay. Tell me any lawsuits that you have filed, starting with the first one.**

A. I think it's only one.

**Q. Okay.**

A. I was employed with Davidson Rubber/Textron of Americus and they filed a discrimination suit about their hiring and promoting practices.

**Q. And when was that suit filed, approximately?**

A. Early '80's. I don't remember the exact year.

**Q. And where was Davidson Rubber located?**

A. In Americus, Georgia.

**Q. And was it a class action or was it an individual suit by you?**

A. Individual.

**Q. And you filed that in federal court?**

A. Yes.

**Q. And who represented you in that case?**

A. Attorney Chevene King, Sr.

**Q. Did that case go to trial?**

A. No.

**Q. You settled it? How did it end up?**

A. Basically he died and I kind of moved on and after -- so we just kind of let it go.

**Q. Okay. It was eventually dismissed?**

A. Yes.

**Q. Did you have to give your deposition in that case?**

A. Yes.

**Q. Have you ever had to give a deposition in any other case besides that one and this one?**

A. Yes.

**Q. Okay. What other cases have you been deposed in?**

A. It was Sims versus Quality Trans.

**Q. And what was that case about?**

A. Employment discrimination.

**Q. And I should ask you, on the Davidson case, was the discrimination at issue racial, age, sex? What kind of discrimination was it?**

A. Race.

**Q. All right. And in the Sims versus Quality Trans, what kind of discrimination was it?**

A. I was a witness, and it was sex and race.

**Q. And were you a witness for the plaintiff or the defendant?**

A. Plaintiff.

**Q. Do you know how that case was resolved?**

A. It's still ongoing.

**Q. Oh, it's still ongoing. And where is that case, in federal court?**

A. Yes.

**Q. In Americus?**

A. Middle District.

**Q. Were you employed at Quality Trans?**

A. No.

**Q. So how did you become a witness in that case?**

A. I'm president of the NAACP in Americus. She had came to us complaining about employment discrimination and to help her with her unemployment hearings. And in the very outset, we didn't think that she actually had a discrimination case because it wasn't anyone comparable to her. So eventually it turned out that someone was comparable, and I just happened to be a witness to it. So that's how I became involved.

**Q. You were a witness to what?**

A. They had discharged her because a patient

fell out of a chair while she was transporting them. And so I was at the gas station one day in Waynesboro. There's a gentleman there that has a food stand, like a fruit stand.

**Q. Sure.**

A. And he asked me to come over and talk with him for a minute. He wanted to discuss something. So while we were there discussing it, a Quality Trans van pulled up; and the gentleman get out, which was a -- which was a white driver by the name of Charlie. He said: "Fellows, can y'all give me a hand. I have a patient that has fell out." And she was kind of a, I'm going to say, mid-age white female and she was, you know, heavy. So we helped him put her back in the chair. And then he called it in.

And so naturally, since I knew about Ms. Sims' case, because it -- her 160-day or 180-day window had not expired, so I particularly paid attention to see if he called it in and that he did.

So after I finished the conversation with Mr. Battle, who was the owner of the fruit stand, I went to my office and got her file and called her; and then we filed an EEOC complaint. So that's how I became the witness.

**Q. Okay. So basically you were a fact**

**witness to the person who became the comparator?**

A. Right.

**Q. And that's the only case you have given a deposition in other than this one?**

A. As far as I can remember, that's it.

**Q. In addition to the suit that you filed against Davidson Rubber, has anybody in your immediate family ever filed a lawsuit that you know of, civil lawsuit?**

A. None that I'm aware.

**Q. Have you ever made any claims that are not the subject of litigation like a Workers' Comp claim or unemployment claim?**

A. Me personally?

**Q. Yes.**

A. No.

**Q. Anybody in your family, your wife or children, that you know of?**

A. No, none of them.

**Q. Have you ever been arrested?**

A. Yes.

**Q. Okay. Tell me about that.**

A. 2008 I was arrested at the voting polls for challenging the 144-foot rule.

**Q. Is that the 150-foot rule from being**

**150 feet from the polling place?**

A. About being -- yeah, about campaigning.

**Q. So who were you campaigning for?**

A. Well, I wasn't really campaigning for anyone. In 2006 I had been a candidate for District 4. And there had been an incident where my opponent, which was Mr. Howard, had violated that rule for over 16 minutes; and I had made a complaint with the Secretary of State. And they said -- they gave some reasons that I don't remember exactly what it was. And so my comment back was that -- that the rule can't just be for him and him alone; and if that's the rule, fine. So I say so I'm going to test it and see if it works for me, too. So in 2008 I had a President Obama picture and a Mr. John McClain picture. So I was within that border.

**Q. And what was John McClain running for?**

A. He was running for President, too. They both was running for President.

**Q. Oh, McCain.**

A. I mean McCain.

**Q. So you had both of them?**

A. I had both of them.

**Q. Okay. So let's go back to 2006 for a minute. You were running for District 4 of the county**

**commission?**

A. Yes.

**Q. Okay. And running against Mr. Howard, who was later also your opponent --**

A. Right.

**Q. -- in 2012, is that right?**

A. No. That was '06.

**Q. But did you recently run against Mr. Howard?**

A. No.

**Q. Okay. So it was 2006?**

A. Uh-huh.

**Q. And had Mr. Howard complained about you campaigning in 2006 at the polling place?**

A. Yeah. He complained about a voter that had came in that had my name on a magnetic sign on the side of his vehicle.

**Q. And what happened to that voter?**

A. He went to the polling place, and that's how the incident occurred. He went to the polling place, which was fine. He got the supervisor, brought her out and showed it to her, which was fine. Then the supervisor went in and found the voter and had the voter to come out. Then after the voter went and moved the sign, he had a conversation right at the

entrance of the door that lasted over 16 minutes.

**Q. And when you say "he," you mean Mr. Howard?**

A. Mr. Howard.

**Q. And Mr. Howard was talking to the poll --**

A. Supervisor.

**Q. Okay. But you're not alleging that he was campaigning at the poll?**

A. Well, it doesn't say when you are campaigning or not. My position was that if you could move my sign, which was just on a vehicle, then he was in violation himself because he was standing there in person while voters came and go.

**Q. But you weren't alleging that he was campaigning in some way?**

A. Yeah, that's what I was alleging.

**Q. Because he was standing there?**

A. Because he was standing there.

**Q. And so in 2008 your presence at the poll with the Obama and McCain signs were sort of a protest to 2006?**

A. Yes. Yes, it was.

**Q. All right. So you were arrested. Then what happened?**

A. I stayed in jail all day, and then they

gave me a bond at 4:00.

**Q. Okay. And then what happened with the charge? What were you charged with?**

A. For that. And later the DA gave me a nol-pros for -- let's see, what did she call it -- in the best interest of justice.

**Q. Do you know what the charge was?**

A. I don't remember exactly, but I think it was violation of that particular -- about the 144 feet.

**Q. All right. Was there ever any complaint brought against you at the election board based on that incident?**

A. Not that I'm aware. No more than that I was arrested. I mean, she called the -- when I say "she," I would say the election supervisor called them. But they were already there anyway.

**Q. Who was already there?**

A. The authorities, the sheriff's office.

**Q. Just because they were at the polling place?**

A. They basically have like security, some, always, usually at the -- at each precinct. At least that's the way it's done in Sumter County, anyway.

**Q. Okay. Have you ever been arrested for**

**anything else?**

A. No.

**Q. Before you came to your deposition today, did you review anything to prepare for it, any documents?**

A. No.

**Q. Prior to retaining a lawyer in this case to represent you, did you make any notes or have other documents that you would need to provide to us about this case, other than the complaint?**

A. Not really.

**Q. I notice that -- I think in your discovery responses -- you said that you had drawn some plans. Do you still have those?**

A. Probably, yes.

**Q. Okay. And have you given them to Mr. McDonald?**

A. I don't think so.

**Q. Okay. Could we get a copy of those from you?**

A. Yes.

**Q. When did you first register to vote?**

A. Probably when I first got out of high school, probably. I don't remember. It's been a long time.

**Q. Was the first place you were registered to vote Sumter County?**

A. Yes.

**Q. And when you moved around the country, did you change your voter registration or did you always leave it in Sumter County?**

A. I always left it in Sumter County.

**Q. You know, there's a term in politics called super voters, people who vote in every election. Would you consider yourself a super voter?**

A. Well, yeah, I voted in every election.

**Q. Do you generally always vote in the primaries, as well?**

A. Yes.

**Q. And are you one of those good people who go out and vote in special elections, too?**

A. Yes.

**Q. Do you typically vote in person?**

A. Yes.

**Q. And do you typically vote on Election Day?**

A. Yes.

**Q. Let's talk a little bit about your background. Where did you go to high school?**

A. In Americus.

**Q. How many high schools were there in**

**Americus when you were in high school?**

A. Two.

**Q. And how many high schools are there today?**

A. One.

**Q. And which one did you go to?**

A. Sumter County High.

**Q. And when did you graduate from high school?**

A. In 1969.

**Q. And where did you go to college?**

A. Georgia Southwestern.

**Q. And did you go there right out of high school?**

A. No.

**Q. What did you do right after you got out of high school?**

A. My grandfather, who reared me, had had a severe stroke; and I was his primary caregiver. So I stayed there from high school until I was about 21, until he died.

**Q. And then what did you do?**

A. Got married and started a family.

**Q. Did you go to college after your grandfather died or did you go some while you were --**

A. No, all of that was after. All of that

was after I married.

**Q. And so you got married. And what was your first job after you took care of your grandfather?**

A. I worked at a foundry.

**Q. In Americus?**

A. Cordele.

**Q. Cordele. And what was that called?**

A. Farmville, F-a-r-m-ville, Farmville. And it was a foundry, and they made brake drums and axles and stuff for trucks.

**Q. How long did you work there?**

A. Probably six, seven years.

**Q. And where did you work after that?**

A. I tried being self-employed a little bit, and then I started working at Davidson.

**Q. When you were self-employed, what kind of business did you have?**

A. It was in selling of fire protection equipment.

**Q. Why did you leave Farmville Foundry?**

A. They went out of business. They closed.

**Q. And when you went to work for Davidson, how long did you work there?**

A. Thirteen years.

**Q. And did you bring your lawsuit against**

**Davidson as the result of being terminated?**

A. No, ma'am.

**Q. Okay. So what was the discrimination in that case?**

A. It was about how they were doing their hiring and promoting from within the plant.

**Q. And so you filed that sometime during your 13 years there?**

A. Yes.

**Q. How long did you stay there after you filed that complaint?**

A. Probably four years, maybe five.

**Q. And then why did you leave Davidson?**

A. Because then we -- my wife had finished and we started another business there in Americus, a restaurant and catering service.

**Q. What did your wife do before that?**

A. She was a housewife.

**Q. With six kids, right?**

A. Yeah.

**Q. So she did a lot.**

A. You've got that right. No way, if she had of worked, it wouldn't have been none left when you pay the sitters, you know, the childcare.

**Q. So what was your business called?**

A. Dixie Bakery, Diner & Catering.

**Q. And how long did you have that business?**

A. Twenty years plus.

**Q. So I'm assuming from the name of it you had both a restaurant and you catered events?**

A. Yes.

**Q. Was that there in Americus?**

A. Yes, ma'am.

**Q. And you said you had it 20 years. When did you close that business?**

A. Officially in 2006.

**Q. Were you kind of closed before that or --**

A. No. You know, we had scaled down. All the kids were basically kind of out of the home. None of them wanted to do it. We were at a point to where it was time to -- I always call it reload, having to replace a lot of equipment. And so just looking at it from an economic standpoint, we were at a point to where we could walk away from it or go in debt again. So we chose to walk away.

**Q. After 2006 were you employed in any other capacity?**

A. No. No, ma'am. No. I forgot.

**Q. No, you said it. Now, when we came in, we discussed the fact that you're a reverend. And so**

**what is your church? Is that right?**

A. Say that again, now.

**Q. You have the title reverend, correct?**

A. Yes.

**Q. Okay. And what is your church?**

A. The name of the church?

**Q. Yes.**

A. Well, my home church is New Beulah Baptist Church; and I'm the pastor of New Union Grove Baptist Church.

**Q. And how long have you been the pastor of New Union Grove?**

A. A little over a year.

**Q. How long have you been a pastor?**

A. About three years. Well, a pastor, I've been a pastor for one year but a reverend three years.

**Q. And what did you do to obtain that title?**

A. Well, it was a calling.

**Q. I mean, did you have to go to school or --**

A. No.

**Q. -- have training?**

A. No. Basically you go to your pastor of your church and then they sort of, I'm going to say, examine you based on what you have been doing in the church previously. And when you -- when a person,

male or female, say that they have been called by God to preach where it's sort of the private conversation, so really the pastor in whom you're talking to pretty much end up taking your word for it. And then he takes you to his -- well, in my case, my pastor was a moderator, which is over like a district. And then he takes it to the district, and then they agree to give you a license. And then after a license, then at some point if you live what you are preaching, they give you -- they do what's called a -- they ordain you, meaning that they make you a full-fledged preacher.

**Q. And so you've been ordained for three years?**

A. Not quite three; probably close to three.

**Q. How many members do you have of your congregation at New Union?**

A. That actually attend? That actually attend regularly, probably 75 to 100; but on the roll, probably about 300.

**Q. Okay.**

MR. PLOWDEN: Typical.

**Q. (By Ms. Lewis) We were talking a little bit ago about your 2006 campaign against Mr. Howard. Is that the only time you have ever run for public office?**

A. Yes, ma'am.

**Q. And at the time you and Mr. Howard were in that race, was your restaurant still open?**

A. Only just the catering portion of it where we just only were doing some catering.

**Q. And what was Mr. Howard's occupation at the time?**

A. I think he was working for the State in some capacity.

**Q. Is he the same Randy Howard who's been the sheriff of Sumter County?**

A. Yes, ma'am.

**Q. Do you know how long he was the sheriff?**

A. Twenty-plus years.

**Q. But you think at the time of the 2006 election, he was no longer the sheriff?**

A. Yes. I'm sure of that.

**Q. He was not?**

A. He was not. He had probably been out of office probably about four years at that time.

**Q. Okay. I want to talk to you a little bit about your case.**

**What made you decide to bring this lawsuit against the Board of Elections?**

A. I just felt that the new proposed district

lines were a violation of Section 2.

**Q. And what had your previous experience with Section 2 been?**

A. Hardly none.

**Q. Before you brought the lawsuit, did you talk to anybody about filing it?**

A. No. I just started reading and looking at it and studying it. I used two primary sources. One was from the Defense League of the NAACP, which was a book they had put out about redistricting, and then one from the ACLU that put out about all you need to know about redistricting. So those were my two primary sources.

**Q. I noticed in your discovery responses you indicate that a person with knowledge of this case is Ryan Haygood of the NAACP LDF. Did you speak to Mr. Haygood about this case prior to filing it?**

A. Yes.

**Q. You did?**

A. Uh-huh.

**Q. Did you ask him to represent you?**

A. Yes.

**Q. And he declined?**

A. Yes.

**Q. Did he tell you why?**

A. No, no more than he's busy, didn't have time.

**Q. Did you meet in person with Mr. Haygood?**

A. No.

**Q. Did you talk to him over the telephone?**

A. Just briefly.

**Q. Did you send him a copy of your complaint?**

A. No, I didn't.

**Q. When was that that you talked to Mr. Haygood in relation to when you filed the complaint?**

A. Let's see. It was filed in March, so it had to be either -- I'm going to say March or either late February.

**Q. Did you talk with any other lawyers prior to filing the complaint about the complaint?**

A. No, I didn't.

**Q. Or about the lawsuit?**

A. No.

**Q. I noticed in your discovery responses you also indicated that you talked with Francys Johnson or that Francys Johnson has some knowledge of this case. When did you talk to Mr. Johnson about the case?**

A. I never talked to him about it.

**Q. So what knowledge does he have of this**

**case?**

A. He had to get it from the past president of the NAACP, which was Dr. Marshall, John Marshall.

**Q. He was the past-president of the Sumter County NAACP?**

A. Yes.

**Q. And did you talk with Dr. Marshall prior to filing this case?**

A. Yes.

**Q. And what did you and Dr. Marshall talk about?**

A. Well, he just said that he felt like it needed to be done and somebody had to do it.

**Q. Was it your idea to file this case or Dr. Marshall's idea?**

A. Mine.

**Q. Does Dr. Marshall go by the nickname Doc?**

A. Yes.

**Q. Do you recall having a conversation with Mr. Bill NeSmith in which you told him, "I wish Doc had never talked me into filing this"?**

A. No, I don't remember having that conversation.

**Q. Do you remember saying that to Mr. NeSmith?**

A. I never said that to Mr. NeSmith.

**Q. Other than Dr. Marshall, did you talk to anybody else prior to filing the complaint?**

A. No. I've talked to very few people about it.

**Q. Who have you talked to about it?**

A. Like I said, Mr. Haygood probably was the only one that I really talked to other than Dr. Marshall.

**Q. And those are the only two people you can think of?**

A. Well, I'm pretty sure those are the ones that I actually talked to.

**Q. Did other people speak to people on your behalf?**

A. I'm not sure about that.

**Q. Did Mr. Haygood tell you why they wouldn't file it other than that they were busy?**

A. No. That was all I got was that he was busy.

**Q. Now, ultimately, you retained Mr. McDonald to represent you in this case, correct?**

A. Yes.

**Q. And do you have a written agreement with Mr. McDonald?**

A. Yes.

**Q. And under that agreement are you required to pay fees?**

A. No.

**Q. When did you hire Mr. McDonald in this case?**

A. It had to be, I want to say, August, maybe, July. It was after the runoff between Mr. Coley and Ms. -- I can't remember her name now.

**Q. Now, when you had the hearing before Judge Sands in June, he mentioned that you needed to get a lawyer, didn't he?**

A. Yes.

**Q. Judge Sands, did he comment that you had previously been represented by the ACLU? Do you remember that?**

A. Yes, in the one with Bill Bird.

**Q. And the one with Bill Bird, what's that?**

A. That case you were talking about that Judge Sands referred to.

**Q. Okay. In the case with Bill Bird, were you a plaintiff or a party in that case?**

A. I was just a party.

**Q. What case is that because I don't think we went over that case when we were --**

A. I don't really know all the ins and out of it. I was just a -- I was just a party to it.

**Q. When was that case?**

A. That's in the same year. It was about one person, one vote, something that Mr. Bird was claiming; and then after Shelby and Holder decision, the case became moot or something and so it was resolved basically.

**Q. But you were a party in that case?**

A. Yes, ma'am.

**Q. And so Judge Sands mentioned that you had been represented by the ACLU in that case, correct?**

A. Yes.

**Q. And did you tell Judge Sands in that hearing that Mr. McDonald had lied to you about something?**

A. Yes.

**Q. And what was that?**

A. Well, I felt that because of the way Judge Sands had written the order about the Section 2 had not been put before him -- well, when I first read that order, I thought that the ACLU and that they were going to basically do it because I had kind of, you know, just sort of moved on.

**Q. They were going to do what?**

A. Basically pursue it.

**Q. Your understanding was they were going to pursue a Section 2 case in the one person, one vote case?**

A. No. Judge Sands in his order, he said that that had not been brought before him about Section 2 or something to that effect.

**Q. In the one person, one vote case?**

A. Right. And so, in other words, from my interpretation or my opinion of it, he had left the door open for a Section 2 complaint. And so I thought and/or I was assuming and then so I kind of felt sort of betrayed sort of like, you know, like nobody -- no one had stepped up and did it. And so when they were getting ready to put the plan in place, the elections with the new plans were being scheduled, it wasn't any movement that I saw from anyone getting ready or prepared to do it.

I never called Mr. McDonald or talked to him again during that -- after it was dropped or even until -- nothing before it was filed. And I think I maybe only talked to him maybe just that one time when it was discussed about would he take the case in August.

**Q. You mean the first time you talked to him**

**about it was when you hired him?**

A. Right.

**Q. So let me make sure I have this right. When the one person, one vote case was filed, you thought that a Section 2 claim would be pursued in that case, is that correct?**

A. After that case ended.

**Q. Okay. So your understanding was that after the one person, one vote case ended that the ACLU would pursue a Section 2 case?**

A. Right.

**Q. And then you learned that was not going to happen, correct?**

A. Well, I didn't actually learn it. You know, that's what I mean by assuming. And I knew nothing was happening. I could see nothing was happening. And so then that's when I started doing the -- what I call the legwork, the reading, the research. And that's when I decided that I was going to do it.

**Q. So to the extent that you said that you felt like you were lied to or betrayed, it's because the ACLU didn't bring the Section 2 case, is that right?**

A. That's basically it.

**Q. And, I'm sorry, you said you have a written agreement --**

A. Yes.

**Q. -- attorney fee agreement?**

A. Yes.

MR. McDONALD: I just want to object to that. The agreements that we have are privileged, and I don't think it's appropriate to go into that.

MS. LEWIS: Well, I think we're entitled to a copy of the agreement except with respect to anything privileged in it. So I'm going to ask you to produce that, and I understand you may object to it.

MR. McDONALD: Yes, we will.

MS. LEWIS: All right. So let's talk about your complaint, which I'm going to mark as Exhibit 1 so we can follow along with each other.

(Defendant's Exhibit 1 was marked for identification.)

**Q. (By Ms. Lewis) One thing I want to ask you first, Reverend Wright, is whether your lawsuit is designed to change only the school board districts or also the county commission districts?**

A. School board.

**Q. So you really are not challenging the county commission districts at all, correct?**

A. Correct.

**Q. There are references to the county commission seats within your complaint, but what I get from the request for relief at the end is that you're only talking about the school board. And that's correct?**

A. Correct.

**Q. In your opinion and based on your knowledge of Section 2, do you think the five-member commission districts violate Section 2?**

A. I'm not sure.

**Q. All right. At the very end of your complaint, you asked the judge -- and this is on Page 9 -- to order the districts for the Sumter County School Board to have nine districts only. Is that still your position today?**

A. No.

**Q. Okay. So what is your position today?**

A. That there be seven single-member districts.

**Q. And have you offered that proposal as a resolution of this case?**

A. I think I have.

**Q. Okay. How did you do that?**

A. I told my counsel.

**Q. All right. So let's look at Paragraph 1 of the complaint. And I'm going to go to Page 2 and ask you about some of these facts that you've stated in the complaint. I want to talk first about the -- it's in the top part of the page where you talk about white teachers and counselors deliberately changing grades so that the white students can always be the valedictorians for a period of eight years. So first I want to ask you: What is that eight-year period? What years are those?**

A. I don't remember. It was -- the Department of Justice was the one that actually validated that point of eight years. In my original complaint about the changing of grades, I was only talking about the Class of -- what was that, 2000 -- I forget what class it was now. But when they did their investigation, that's when the eight-year period came in.

**Q. So let me ask you this: Were you the person who brought the original complaint to the Department of Justice about the grade issue?**

A. I was a part to it. The actual complainant was -- Ms. Raven Harris was the student

who was affected.

**Q. And so the Department of Justice did an investigation for some period of time --**

A. Yes, ma'am.

**Q. -- over these allegations? And you said ultimately the Department of Justice issued findings?**

A. Yes, ma'am.

**Q. And how did it get resolved?**

A. The school district entered into a voluntary agreement with the Department of Justice about changing some of their rules and policies and different things that they were going to do to assure that it wasn't going to happen. And the very next year it was a -- whether it was -- whatever, but anyway, the very next year was a black valedictorian.

**Q. Now, is it your position, Reverend Wright, that for those eight years that the white valedictorian really was not the valedictorian by grades?**

A. Well, I can't really testify to the full eight; but I can testify to the one that I had done the investigation on. These other seven years, the Department of Justice did those.

**Q. And you say in your complaint that the school board voted not to reprimand those who were**

**involved in the valedictorian scandal. First of all, let me ask you, who were the people that were involved in it? Was it a big group of people?**

A. Yes, fairly large. It was the counselor and principal, assistant principal, teachers.

**Q. And I think you told me earlier there's only one high school in Americus, so this was all at Americus High School or Sumter County High School?**

A. Yes. Americus High School, south campus.

**Q. And from that I'm assuming there's a north campus?**

A. But it's just the 9th grade only.

**Q. So north campus is 9th grade only; south campus is 10, 11, and 12?**

A. Yes, ma'am.

**Q. And you said that there was no reprimand by the school board. Did you bring a complaint to the school board?**

A. Yes.

**Q. And nothing happened on your complaint?**

A. No.

**Q. Although there must have been a hearing of some sort on your complaint because you say that the vote was along racial lines. So the school board did take the complaint up, is that correct?**

A. I wasn't present at that particular meeting, but the indication was that a vote was taken and so -- but the vote was along racial lines, that there was a 5/4 vote.

**Q. And you say in your complaint that the Department of Justice found that black African American students' grades had been arbitrarily changed. Were those students other than the original student that you brought the complaint about?**

A. I'm sure it was.

**Q. But you're not sure?**

A. Well, I mean, I'm sure it was because she was a senior, the one that I was representing. So the only way that they could have found it basically about the valedictorian issue, it would have had to have been in the senior class for each one of those years.

**Q. I want to ask you next about in Paragraph 2 you describe a situation in which the Department of Juvenile Justice, I suppose, took some action with respect to the employment of Carolyn Whitehead. Tell me what that was exactly.**

A. Ms. Whitehead was an incumbent and had been -- she was the oldest seated member on the -- when I say "oldest," in terms of tenure.

**Q. Longest serving, right.**

A. And she had called me and left a recording on my phone that said my employer is not going to approve for me to qualify this time. And she says, it's 11-something and qualifying ends at 12:00. So unless I get the okay, I can't -- I won't be able to run again. That's what the -- that's what the voice message was to me.

**Q. And did someone else qualify for her seat?**

A. Yes.

**Q. Was that person also an African American?**

A. No.

**Q. Did you later talk to Ms. Whitehead about what the conversation with her employer was?**

A. Not really.

**Q. Ms. Whitehead was at that time employed by the State Department of Juvenile Justice, is that correct?**

A. Yes.

**Q. Do you know whether or not her job involved any programs that were funded with federal dollars?**

A. No.

**Q. Have you ever heard of the Hatch Act?**

A. No.

**Q. Let's look at Paragraph 3. You say: "In**

**this case discriminatory acts began when the Sumter County School District elected a majority black school board in 2011." What discrimination began when that majority black school board was elected?**

A. Just complaints about the -- from people within the community about the way the school board was now handling and conducting business.

**Q. Once it became a majority black school board?**

A. Yes.

**Q. So people were complaining about the way it conducted business?**

A. Yes.

**Q. And what were the complaints that you can recall?**

A. I don't -- something about not being able to speak at the meetings and something about discipline. I'm not really sure exactly what the -- what the specifics were.

**Q. And these were complaints coming from black and white people?**

A. There was -- as far as I know about personally, there was one black and many whites.

**Q. And who was the one black who was complaining about it?**

A. Mr. Jacob Battle.

**Q. Battle?**

A. B-a-t-t.

**Q. You also say that "white officials and special interest groups devised a redistricting plan to dilute the black vote." What white officials were those?**

A. Well, primarily, I thought it was Mr. Hooks and Mr. Cheokas. That's what I thought.

**Q. Why did you think that?**

A. Because Mr. Hooks had introduced the first bill, and then Mr. Cheokas later did the other one.

MR. PLOWDEN: Mr. who?

THE WITNESS: Cheokas, Mike Cheokas.

**Q. (By Ms. Lewis) Now, Reverend Wright, you know that in 2011, because of the census, there would have to be a redistricting of the county commission and the school board, correct?**

A. Yes.

**Q. In your opinion, what was Freddie Powell Sims' role in the 2011 redistricting?**

A. Well, at the very beginning, she had no role much; but at the very end, from the way that Mr. Cheokas had introduced the bill in the House, it required her signature.

**Q. And she signed it, correct?**

A. Right.

**Q. Did you ever speak with her about that?**

A. Yes.

**Q. And what did you tell her?**

A. Well, I spoke with her before she signed it. And when I had the conversation with her about it, she had said, because of the way that he had brought it to the floor and how it violated something she said, which I don't really know, but some kind of rule, that she wasn't going to sign it.

**Q. That she wasn't going to sign it?**

A. That she wasn't going to sign it.

**Q. But then she ultimately did, correct?**

A. Yes.

**Q. After she signed it, did you have a conversation with her then?**

A. No. I never talked to her again. She sent me a -- I guess it was a mass e-mail that she sent out because I heard that a lot of people had gotten it.

**Q. A lot of people had what?**

A. Received the e-mail that she sent out.

**Q. And what did the e-mail say?**

A. Something about she did it for the good of

the community and that it was going to probably bring scars and divisions that's going to last a long time, something like that.

**Q. Do you know anything about SACS' interaction with the Sumter County School Board?**

A. I guess some.

**Q. Do you know anything about recommendations that SACS made with respect to the size of the school board prior to the redistricting in 2011?**

A. No; no, ma'am.

**Q. Was the plan passed in 2011 or 2012, the new school board plan? Do you remember?**

A. I'm not sure, because it got delayed because of the court proceedings, because it really didn't happen until really this year.

**Q. You mean you didn't run under that plan until this year?**

A. Right.

**Q. At the time that the new school board plan was passed by the General Assembly with the five districts and two at-large, who were the representatives to the General Assembly from Sumter County? Mr. Cheokas?**

A. Yes.

**Q. And Senator Sims?**

A. I guess it would be Senator Sims because Mr. Hooks retired -- I'm not sure which one of them years -- '10 or '12. But he retired somewhere in there.

**Q. And in Sumter County you just have one member of the House and one member of the Senate, is that correct, to your knowledge?**

A. I think it's broken.

**Q. You think you have more?**

A. I think it's broken. You know, the line kind of runs and splits it. There's one -- they got one portion of it. It is broken, because Mr. Kirk, Greg Kirk, is the senator that's in my district; and Ms. Sims is the senator in the other portion of the county.

**Q. Okay. And then for your House representatives, it's Mr. Cheokas and Mr. Rynders?**

A. Right.

MR. PLOWDEN: What was that second one?

MS. LEWIS: Rynders, R-y-n-d-e-r-s.

MR. PLOWDEN: Thank you.

**Q. (By Ms. Lewis) Prior to the school board plan being passed by the General Assembly, were there hearings at the school board regarding the plan, school board meetings?**

A. There were some meetings, but they were -- in my opinion, they were disguised because they never talked about the school board per se. They only talked about the county commissioners.

**Q. And when you say "they," who do you mean?**

A. That was Attorney Jimmy Skipper and Attorney Bill NeSmith.

**Q. And were these at meetings of the school board or meetings of the county commission?**

A. Well, no, this was school board. You know how they would have the meetings, you know, to, let's say, meet the standard of what you're supposed to do, inviting the public in when they're getting ready to do the district lines, because I protested at the end of each meeting that we never really discussed the school board.

**Q. And did you get an answer to that?**

A. No.

**Q. So when was the first time you saw the plan that went from nine single-member districts to five districts plus two at-large? When is the first time you saw that school board plan?**

A. I'm not sure.

**Q. Was it before it passed by the General Assembly?**

A. No, it wasn't before.

**Q. So after the plan was passed by the General Assembly, am I correct that it was basically too late to put it in into place for the 2012 elections?**

A. No, I think it was passed in time. But I think because of the different lawsuits that had been filed, that's what delayed it.

**Q. Tell me, if you can, about the history of the submission of the plan for preclearance and the withdrawal of the plan. How did that go with respect to the school -- let's just talk about the school board plan because you've said that you're not talking in your lawsuit about the county commission plan. So let's just talk about the school board plan.**

**So the school board plan is passed by the General Assembly, correct?**

A. Uh-huh.

**Q. You have to say yes or no.**

A. Yes.

**Q. And you understand, Reverend Wright, that the school board can devise a plan but ultimately it has to be passed by the General Assembly?**

A. Yes.

**Q. So the General Assembly passes the new**

**plan following the 2010 census and submits it to the Department of Justice for preclearance. What happens next?**

A. And then if the Justice Department approve it, then it's accepted and goes through. And then if it's denied, then they send it back and then they have to redo it.

**Q. And that was a terrible question on my part because it sounded like I was asking you what happens generally speaking. I meant what happened in Americus. Once the plan was passed and it was submitted for preclearance, what happened in Americus?**

A. Well, you know, I may have been, I'm going to say, naive of lack of, I'm going to say, legally trained mind, but from what I have read, that there was a grandfather clause that was written along with that plan that said if you had more than the seven members as of July 1st, 2010, then the only way you had to change it was the school board would have to vote it in. That particular bit of information, when I had -- and I did talk to the black members of the school board. None of them had that piece of information when they took the vote.

Then the chairman of the board went to see Mr. Skipper, who was representing the board. Then she

found out that only the black members of the board didn't know that, because in its meeting publicly he was saying that they had no choice, they had to vote on it, and that the General Assembly had passed it and that they had to do it. He never made any mention about that particular little clause.

After he had his speech, then they got to the part to where citizens could speak. I had a speech that said that basically that I thought Mr. Skipper was bamboozling you, that he ain't telling you the truth, that you didn't have to take the vote. And so it started from there.

**Q. So let me back up for a minute. After the public meetings where there were some discussion about these plans, then the school board took a vote on the plan --**

A. Correct.

**Q. -- correct? And did all the members of the school board vote in favor of the new plan?**

A. Yes.

**Q. And the new plan was five districts and two at-large, correct?**

A. Correct.

**Q. And so I lost you in the clause. What was the clause that the black school board members didn't**

**know about?**

A. About it was a grandfather clause that said if you had more than the seven as of July 1st, 2010, you didn't have to change it unless you voted to change it.

**Q. Oh, I see. And they had voted to change it?**

A. And they had voted to change it.

**Q. And you're saying what the black members didn't know, that that clause would be in there?**

A. That that clause was there, that information had been withheld.

**Q. And is it your position that that information was withheld by Mr. Skipper?**

A. Yes. And then I think that's what prompt the withdrawal of the plan.

**Q. Why do you think that's what prompted it?**

A. Because at that time when they found out that the clause was there, they felt betrayed themselves.

**Q. And so now the school board was majority black and withdrew the preclearance submission, correct?**

A. Right.

**Q. And so that left Sumter County without a**

**school board plan, correct? Is that your understanding?**

A. Yes.

**Q. And so there was a one person, one vote case filed what we discussed earlier, correct?**

A. Yes, yes.

**Q. And under that case the 2012 election proceeded with the nine members?**

A. Yes.

**Q. And the next thing that followed was the Shelby County case which said you didn't need preclearance or that preclearance couldn't be enforced, and so then the plan that had been passed by the Legislature was put into effect, correct?**

A. Yes.

**Q. Let's go back to your complaint. In Paragraph 3 you list a series of events numbered 1, 2, 3, 4 in the second paragraph of Paragraph 3. But I want to ask you about the first statement that you make, "Each and every redistricting cycle has been marked by efforts to dilute the black African American and Hispanic vote." When you say "each and every redistricting cycle," how far back are you going?**

A. 2010.

**Q. Oh, just this one?**

A. (Witness nods head affirmatively.)

**Q. Okay. What was the effort to dilute the black American vote in 2010?**

A. As it relates to the school board, the new plan would change the current members. It would immediately swing from a majority of black board to a majority white board.

**Q. And on the school board, does the race of the member also correspond with the party of the member so that the black members are democrats and the white members are republicans or do you have black republicans or white democrats?**

A. I'm not sure about that.

**Q. And you also say that each and every redistricting cycle which you've said is the 2010 redistricting cycle has been marked by efforts to dilute the Hispanic vote. What's the percentage of the vote in Sumter County that's Hispanic?**

A. Right now it's about 4 percent, if I'm not mistaken.

**Q. And is it your position, Reverend Wright, that in changing the makeup of the board so that it is no longer a majority of black board that that also dilutes the Hispanic vote?**

A. I would say probably yes.

**Q. All right. Are there any Hispanics on the school board?**

A. It was.

**Q. In what year?**

A. 2011, I believe.

**Q. And who was that person?**

A. I forget his name. He didn't stay very long. He actually moved out of the district.

**Q. Did he resign during his term?**

A. Yes. He left during his term. He moved out. At least I take him to be Hispanic. He had a Hispanic name.

**Q. But his decision to leave the school board was the result a residency change?**

A. As far as I know. Now, I don't know no more than I know he moved.

**Q. Let's talk about the numbered actions that you've got in your complaint. And let me ask you first, in all these different examples that you've listed by number, you say something to the effect of the first action or the first time any majority board was subject to and then you list something. When you say "the first time," do you mean the first time a majority board in Sumter County or do you mean anywhere?**

A. Sumter County.

**Q. Okay. But isn't it the case that there wasn't a majority board in Sumter County until 2010?**

A. Yes.

**Q. Let's talk about the first action. You say the majority black school board was brought before the Superior Court of Sumter County during the February 2012 grand jury term. What was that about?**

A. It had to do about the complaints from the community that we discussed earlier about the Robert Rules of Law of a meeting and not being able to speak at the meeting and just a list of --

**Q. So the complaint that was brought before the grand jury had to do with the way that the meetings of the school board were being conducted?**

A. Yes.

**Q. Was there any complaint other than the process of meetings?**

A. I'm not sure about -- because I didn't really keep up with it that detailed. But that was the -- that was my take on it.

**Q. Do you know what ultimately happened in that case?**

A. There was a lot of recommendations given to the school board, I think, about 20-something

recommendations for them to consider about being voted in.

**Q. About being voted in?**

A. Yeah. The grand jury made 20-something recommendations about what they should do and then the DA, I guess, by way of their attorney sent them to the school board for them to consider.

**Q. Was anybody charged with anything?**

A. No, they never got charged.

**Q. And do you know if the school board followed those recommendations?**

A. I'm not sure.

MR. PLOWDEN: Anne, excuse me. Can we take a little short break?

MS. LEWIS: Yes, we can. We sure can.

(Recess from 11:25 a.m. to 11:30 a.m.)

**Q. (By Ms. Lewis) We're back on the record. Reverend Wright, let's talk about the second item that you listed in Paragraph 3, that the school board was summoned to a hearing before the state Board of Education in November of 2012. What was that about?**

A. The same complaints.

**Q. Regarding the conduct of the meetings?**

A. Yes.

**Q. The next one is about entering open**

**meetings at complaints made with the Department of Law. Is that the same complaint?**

A. It's the same complaints, except for it was with the Attorney General office that was inquiring.

**Q. And what became of those complaints?**

A. I'm not sure.

**Q. Did the Attorney General come to Sumter County?**

A. I'm not positive about that either.

**Q. In No. 4 you say that the school board had a petition for expungement of the 2011 grand jury report. Is that the same as the 2012 grand jury item mentioned in No. 1?**

A. Yes, that's the same.

**Q. So maybe it should be the 2012?**

A. Yeah, maybe it should be '12 instead of '11.

**Q. So just for the record, in Paragraph 3 of the complaint, the second paragraph, No. 4, it should read: The first time any school board had to petition for expungement of the 2012 grand jury report in the Superior Court of Sumter County, Georgia, is that correct, Reverend Wright?**

A. Yes, ma'am.

**Q. The next item is your allegation that the school board was subjected to the Southern Association of Colleges and Schools investigation, placing the school district's accreditation in jeopardy. What was the basis of that issue?**

A. Because the same complaint almost identical when we were doing the grade scandal about changing of grades, I made the same complaint to SACS in 2008, I believe, or '09. They were almost worded -- because I saw the one that they made and the one that I made. And we never got a response. At least I never got a response.

**Q. So let me back up for a minute. So the complaint that you made to SACS regarding the grade scandal --**

A. And the way the meetings were being conducted because, when I was complaining heavily about it, they stopped me from talking about the meetings. They even put it in writing that I couldn't talk to them at the meeting. I made complaints with the Department of Law. I even wrote the -- at that time it was Governor Perdue, I wrote him about it. He did answer me; and he quoted me back that if they didn't let me do it they were violating some Georgia Code, something, something, something, something,

something. But the bottom line was that when basically the white community started making these complaints to the state officials, they were getting responses. They were coming to Sumter County and they were reacting. I'm sitting here looking at my complaint that almost mirrored their complaint, and they only would tell me that it was a local issue, that it should be decided locally.

**Q. And when you say "they," do you mean SACS?**

A. SACS, the Department of Law. Like I say, the only one that gave me any favorable response was Governor Perdue. But I had complained to these same people.

**Q. And so it's your position that you made complaints about the process of the Sumter County School Board and those were ignored?**

A. Right.

**Q. But when complaints were made after the board became majority black that the complaints --**

A. Were not ignored.

**Q. -- were not ignored?**

A. That's right.

**Q. Do you know what became of the open meetings complaints that were made against the board that was elected in 2012?**

A. I'm not sure.

**Q. Was the petition for expungement granted?**

A. I don't know.

**Q. Did SACS place the school system on probation or penalize the school system in some way?**

A. I know they were on probation.

**Q. After this complaint was made?**

A. Yes.

**Q. And to your knowledge, was the probation based entirely on the board's lack of process?**

A. Yes. They said that they were dysfunctional, that they voted basically one way. The state school --

**Q. What way was that?**

A. All the blacks voted together, and all the whites voted together. And then I challenged that because Ms. Whitehead would sometime not vote with the other five blacks. She voted with -- you know, with the other three whites. So that statement wasn't true. And then even with the state, I even challenged the state school board. I said if you're looking for a -- that all of the blacks are voting together, all the whites are voting together, that has been happening all the time even when it was a white majority. And, plus, when I look at your makeup, the

state school board makeup, then every vote you take is a dysfunctional vote because you're basically all white pretty much. You've got one black, a couple Hispanics. At least by the names they seem Hispanic, anyway. So that wasn't a reason to me to say you were dysfunctional.

**Q. Let me ask you this, Reverend Wright: Have you followed at all SACS penalties on other school systems in the state?**

A. I knew about some of them but not really followed them.

**Q. Would it surprise you if SACS often cites boards for being dysfunctional?**

A. Well, you know, not really. But, then, that was my point then when it was a predominantly or majority white school board. If it was dysfunctional now, it was dysfunctional then because the votes went the same way. That was my argument with SACS, how can you make that determination now and you didn't make it then unless you were racially biased yourself.

**Q. The next, No. 6, is your allegation that majority school board members' employers essentially were demanded to fire black members from their jobs. Who were you talking about there?**

A. The black school board members, and they

did send me copies of their -- of those letters. Each one of them had a letter sent to their employer demanding that they be fired for their actions on the school board.

**Q. After complaints were made?**

A. Yes, these complaints that we just got through discussing.

**Q. Do you still have copies of those letters?**

A. Most likely I do. But, if not, I know the school board members got them. I mean, the individual person would have them.

**Q. Okay. And if you have copies of those letters, if you'll give them to Mr. McDonald so he can give them to us.**

A. I will.

**Q. The last allegation in that series is the first time any majority school board was subjected to a lawsuit in the United States District Court for the Middle District of Georgia, is that the one person, one vote suit?**

A. Yes.

**Q. At the end of that paragraph, you say that all of the listed actions were discriminatory and racially motivated. And so is it your position that all of the complaints made were strictly based on**

**race?**

A. Yes.

**Q. You don't think that any of the complaints had any merit to them in terms of people not getting to speak?**

A. No.

**Q. Were you at all the meetings?**

A. Most.

**Q. And it's your position that people were allowed to speak?**

A. Yes.

**Q. And that the meetings were being run correctly?**

A. Yes.

**Q. In Paragraph 4 you say that no black African American has ever won a county-wide election in Sumter County, Georgia. Where did you get that information.**

A. Off the Internet.

**Q. Is there something specific to Sumter County?**

A. I just was searching. I searched -- I can't tell you all the different sites I went to.

**Q. So you don't really remember where you got that?**

A. No. And then I talked to the historian there, Mr. Allen Anderson, who knew Sumter County -- all of its history. He's the one that really knows about what happens in Sumter County. But on the Internet is where I really based it on was what I found there. But he also said that it had never been.

**Q. And where does Mr. Anderson work?**

A. He's retired, and now he's -- he just recently had a stroke since then.

**Q. Oh, I'm sorry.**

A. It messed up his memory. It comes and go.

**Q. Is Sumter County majority black in total population, do you know?**

A. I'm not -- I think it is, but I'm not sure right now off the top about the voting age and nonvoting age and who can and who can't vote.

**Q. Do you know how the registration numbers between black and white voters compare in Sumter County?**

A. No, I don't know it.

**Q. In Paragraph 4 you give some history about various cases in other counties. The first one you refer to is a Sumter County case, but the second one you refer to is a case in Spalding County. Do you know when that was?**

A. Well, according to what I found, it was in 1973.

**Q. All right. And then you refer to a case in Webster County where officials there adopted a new redistricting plan on the eve of the last redistricting cycle. So do you mean the 2000 cycle?**

A. No. I guess that must have been -- from what I can remember, it must have been around 1996.

**Q. Okay. You say at the end of that paragraph that the new plan for the Sumter County School Board mirrors Webster County. But then above that you say that the Webster County redistricting plan is a five-member single district. So how does it mirror Sumter County?**

A. Well, I mean, what I mean was that it was changed in order to get a perceived outcome and that the change -- that the new plan for Sumter County is a change to get a perceived outcome.

**Q. And your understanding of the Spalding County and Webster County cases are based on what you read?**

A. Right.

**Q. Did you talk to anybody about those cases?**

A. No, I didn't call them.

**Q. Let's go to Paragraph No. 5. In the**

**second sentence, you say that the school board plan is subject to preclearance. But you understand that's not correct anymore, right?**

A. Right.

**Q. Let's go to the last sentence in that paragraph. You say that the -- I guess what we're talking about here is the school board plan is a Jim Crow law. What do you mean there?**

A. That it is a law that's designed to prevent black people from being the majority on the school board.

**Q. Let's go to Paragraph No. 7. You say that the new plan will mirror the county commissioner plan that has three whites and two blacks. But you would agree with me that the new plan also has two at-large members?**

A. Right.

**Q. And I think we discussed earlier, the last sentence in that paragraph says that the current Sumter County Board of Commissioner districts reflects a clear violation of Section 2 of the Voting Rights Act of 1965. That really should say the current Sumter County Board of Education districts?**

A. Yes.

**Q. Let's go to Paragraph 8. In Paragraph 8,**

**when you filed this complaint, you said that Sumter County had a history whereby the minority group is politically cohesive and usually votes for the same candidates in all elections. How did you know that when you filed this complaint?**

A. Well, I really just based it off of the election that I was involved in in 2006.

**Q. And how did you come to that conclusion based on your election?**

A. Well, in that particular election it was actually three of us running in the beginning. It was two white males. The incumbent was Tift Pace, I believe, then Mr. Howard and myself. And then it was the runoff between Mr. Howard and me. And when you pull the data after the election, it doesn't tell you who the people voted for, but it tell you who all voted.

So after the election that I was in, I made the comparison of who all had voted the first time and so which had the ones that had voted for Mr. Pace as well. Then I compared who voted the second time during the runoff between Mr. Howard and me. So then when I did the tabulations, that all of the people who basically had voted for Mr. Pace and living in Sumter County -- I know the majority of the

people by name, especially black voters. So, therefore, I could only come up with that then all of the white voters, even though I campaigned and went to their houses and did things, the normal door to door and said they were going to, yes, support me, but in the end, they had voted the other way. So that's how I make that assumption that the whites was voting for the whites and the blacks were voting for the blacks.

**Q. And did you base that on how many white voters turned out and what the result of the election was?**

A. I don't remember. I don't remember what the turnout was. But that was how I determined that they were doing or that it was so or that it was happening.

**Q. So let me make sure I understand how you did that. So you had a primary, correct?**

A. Right.

**Q. And who went into the runoff?**

A. Mr. Howard and me.

**Q. All right. So you were the two democrats?**

A. Right.

**Q. Okay. And then he won the runoff?**

A. Correct.

**Q. Okay. And you determined that the white**

**voters voted for him how? How did you determine that?**

A. Well, in the primary you get the list of who voted. The runoff you get the list of who voted. The number of people voted was basically the same. I don't remember how many it was. But the people who voted, my total from the primary to the runoff was basically the same; but his number was the number that increased. So that means that the people that had supported Pace had supported him. And then when you look at the way they push whether they're black or white and I'm going down the list and I'm looking at the black names, so I just said, well, okay, if I take for granted, not knowing, if all the black people voted for me and I put that number down, then it gives me -- and I'm just assuming that. If they all voted for me, what would that number be versus what would this number be. And there were only four votes that was not accounted for that may have been someone voted for me other than being white or Hispanic.

**Q. You mean there were four votes where there was no race of the voter?**

A. Or that was another race other than black. In other words, let's say 300 black folks voted and I counted one, two, three, four, how many black folks voted and then I put the number down. Then I looked

at, okay, if 300 voted and just say all three voted for me, then I look at my total and say if my total is 304, then that means there's only four people from another race voted for me if that was -- but that was the way I did it, not whether it's right, wrong, indifferent.

**Q. Right. So to make the statement that Sumter County has a history where the minority group is politically cohesive and usually votes for the same candidate in all elections, you really base that on your 2006 election?**

A. That's right.

**Q. And then you gave an example of a school board election in 2011 and you say: "After reviewing who voted in the election, it was clear that the votes were along racial lines." Did you come to that conclusion based on the same process you just told us about your election?**

A. I did the same thing in this -- in this election between Ms. Minich and Mr. Pless.

**Q. Okay. In Paragraph No. 9 you say the majority of Caucasian white voters in Sumter County always vote together to defeat any preferred candidate representing the black population. Have you read your expert's report now?**

A. Yes.

**Q. Okay. Do you know he came to a different conclusion?**

A. Well, he may have. Like I say, this was done -- this is my mind on this paper.

**Q. Okay. And so when you give an example of the county commissioner District 4 race in 2006, again, that analysis is based on the same analysis you gave us for the conclusion you came to in Paragraph 8?**

A. Right.

**Q. All right. In Paragraph 10 you refer to a concept known as packing and cracking.**

A. Uh-huh.

**Q. First of all, what does "packing" mean to you?**

A. Packing means to me that you put a certain amount of voters in a -- you take the district lines and you draw them in a way to where you put a majority of people in one place instead of having them spread out over a place. And then cracking, if that's going to be the next question, is when you break them up or and you kind of disburse them out.

**Q. So is it your contention in this case that there's both packing and cracking, because to me those concepts would seem inconsistent? You're either**

**putting people together or you're separating them. So explain to me how you have them in the same instance.**

A. Well, under the nine-district plan in which at that particular time I was naive, thinking that I probably could get nine districts, but I later learned that the best I could hope for was seven, so when I look at the five districts or single-member districts, then look at how the school board was drawn with the nine-member districts, it did both. It packed them to where all the blacks were basically in just two districts and then the rest were fractioned up in the other three districts. So it really did both in my opinion.

**Q. Let me, Reverend Wright, if you will, go back to Paragraph 3 for a moment. What were the special interest groups who you think devised a redistricting plan to dilute the black vote?**

A. Again, I would say that it was primarily Senator Smith -- not Smith, Hooks; Mike Cheokas, Representative Cheokas; Attorney General Skipper; and Attorney Bill NeSmith. If I had to name people, those would be the four that I would say were the special interest groups that sort of brought in the other people to make the complaints about the school board. But I would say it started with them.

**Q. And so is it fair for me to say when you say the white officials and special interest groups, those are really the same people?**

A. Yes, ma'am.

**Q. Reverend Wright, I probably have about an hour and a half more of questions. Would you like to go through or would you like to stop and take a little bit of a break?**

A. No, I'm fine.

**Q. You're okay?**

A. Uh-huh.

MS. LEWIS: Laughlin, is that --

MR. McDONALD: I think the sooner we get it over, the better. The happier everybody will be.

MS. LEWIS: All right. That's fine. Is that okay with you, Warren?

MR. PLOWDEN: Well, I've got something else to do, but y'all proceed.

**Q. (By Ms. Lewis) Let's look at Paragraph 13. You say that the current school board plan is no more than a bullet voting scheme. What does that mean to you? What's a bullet voting scheme?**

A. Really, you want -- I just, because of the two at-large seats, again, in my mind, that's what I

thought was a bullet voting scheme, because of the two at-large seats.

**Q. In Paragraph 14 you say that the school board plan is a form of candidate slating. How is it slating?**

A. That one, I miss -- I found out that I misinterpreted what that meant. So I don't think it was -- it may be, but I'm not sure.

**Q. All right. So it's your testimony today that you're not sure it's a form of candidate slating whereby the African American candidates will lose their seats?**

A. Well, you know, at the time and whether it's correct or not, I was looking at it from this perspective. We had six members. The new plan was going to -- when I say "six members," six black members, that the new plan was going to reduce it from six to two. And that's really what happened.

**Q. But you're agreeing that nobody is running as a slate?**

A. Right.

**Q. Correct?**

A. Right.

**Q. In Paragraph 16 you say that local Caucasian officials only sought to redo district lines**

**after the school board became a black majority board after the November election in 2010. But you agree with me that after the census every ten years there has to been a redistricting, correct?**

A. Correct.

**Q. So even if your belief is that the reason for the redistricting was the election of a black majority board, that another reason for the redistricting was the census, correct?**

A. Right.

**Q. At the end of your complaint, the last page on the service page, you list a number of people that were going to be served. Do you know if any of those people were ever served? Did you serve them or have somebody serve them?**

A. The sheriff's office served them.

**Q. Served all the people that are listed?**

A. Yes, ma'am.

**Q. After the sheriff's office serves somebody, they do something called a return of service saying I returned Anne Lewis on this day. Did you ever get those?**

A. I don't recall if I did or didn't.

**Q. I'll just represent to you they're not filed in the court. And so you didn't ever file**

**those, correct?**

A. No, I didn't ever go back and file them.

**Q. Okay. I want to talk a little bit about some newspaper articles that we have read about the case. And in all of these you've been interviewed by the Americus Sumter Observer. Is there a particular person that you generally talk to at the Observer? Is there more than one reporter?**

A. It is more than one reporter.

**Q. Okay. And is there a reporter that is assigned to your lawsuit that you generally speak to?**

A. Yes.

**Q. And who is that person?**

A. The owner and editor and publisher, John Marshall.

**Q. Okay. Dr. Marshall?**

A. Uh-huh.

**Q. You have to say yes or no.**

A. Yes.

**Q. Now, I'm going to ask you a couple of questions about these articles and I want to be able to give you a copy so you can follow along. I'm going to mark this as Defendant's Exhibit 2.**

**(Defendant's Exhibit 2 was marked for identification.)**

**Q. (By Ms. Lewis) Unfortunately, when we print it off, it prints the day we printed it off. And so the only thing I can tell you is I think the date of the article is probably the day the picture was uploaded. So this one we're going to call Article 1 and the title of it is "Did NeSmith and Howard Make a Deal With the Law Firm for Several Million Dollars?" Was this an article written by Dr. Marshall?**

A. Yes.

**Q. And Dr. Marshall says that he did a question and answer with you about the lawsuit. Do you recall doing that with him?**

A. Yes.

**Q. In that article Dr. Marshall asked you: "If the County Commissioners told their legal counsel to mediate and resolve this case amicably, would you be willing to do so?" I'm sorry, Reverend Wright. I'm on the second page, maybe about four sentences up. Do you see that?**

A. The second page?

**Q. On the second page, it starts with "Our last question is concerning resolving this case."**

A. Oh, okay. Okay. I see it.

**Q. And the question was: "If the County**

**Commissioners told their legal counsel to mediate and resolve this case amicably, would you be willing to do so?" And you answered, "Yes." And I'm assuming that was the case in September of this year. Is that also the case today?**

A. Well, this was about the case today.

**Q. Right. And so at that time when you gave the interview, you said that you would be willing to attempt to settle the case amicably, correct?**

A. Yes.

**Q. And is that also the case today, that you would be willing to do that?**

A. Yes.

**Q. All right. What do you see that being? What's a resolution for you?**

A. For me, seven single-member districts.

**Q. And as we've talked about earlier, you agree that in order for there to be a new plan it would have to be passed through the General Assembly, correct?**

A. I guess. I'm not sure --

**Q. Well, that's how the --**

A. -- what the procedures are.

**Q. You agree that's how the last plan was passed?**

A. Right.

**Q. He also asks you how the lawsuit was progressing, and you said it was moving right along. At some point in another place you reference the fact that the judge allowed this case to go forward after a preliminary injunction. But you understand, don't you, that the preliminary injunction was just an effort to try to have something happen before the case went forward, correct?**

A. I guess.

**Q. Okay.**

A. I guess so.

**Q. Right. So the fact that you did or did not get a preliminary injunction, the case was going to move forward anyway, isn't that right?**

A. I don't know. All I know, this reference was because of the statement that Mr. NeSmith had made to me about the case had no merit. And that's what it was centered around, and I was saying the case do have merit. So that's where -- I guess that's where that's really about.

**Q. You were asked about the -- I'm sorry. This is on the third page and a little bit more than halfway down the page. Dr. Marshall asked you about the two county commissioners who voted to rescind**

**their votes to hire Strickland, Brockington, Lewis to defend Sumter County. Originally all the county commissioners had voted to hire our firm, correct?**

A. Yes, ma'am.

**Q. Okay. And do you have any understanding of why the other commissioners voted to rescind the vote?**

A. Not really. I can't say, you know, specifically why.

**Q. And then later, just a little bit further down that page, you say that you're confident that you won't lose "because all the complaints made before the lawsuit was filed have now become facts." What do you mean by that?**

A. Well, the primary where there were two black candidates that were at a county-wide election, they both lost; that the school board, about the packing and the cracking, that the school board went from six members to two, just like I had made in the complaint. So that's basically what I was saying.

**Q. So, in other words, the election had now occurred?**

A. Right.

**Q. On the last page of that article -- well, let me preface this by saying we're lawyers. We have**

**thick skins. So I just want to ask you, though, what the factual basis is for some of the allegations that you've made against our firm. And so your answer to the question, "Do you believe the hired firm will be able to keep the budget of 800,000 to $1 million cost if it goes to trial," "No, they are already spending money as fast as they can spend it," what do you mean by that? Like I said, my feelings aren't hurt; but what do you mean by that?**

A. I mean that, you know, at that time I believe I had heard about you were going to hire an expert at an hourly rate. I knew that depositions would be coming, and I knew that was going to be expensive. So that's sort of what I -- that's sort of what I meant was, you know, that, hey, it's moving right along, you know. That money is being spent.

**Q. And, I mean, you would agree as the plaintiff, you have an expert, correct?**

A. Yes, ma'am.

**Q. And for a Section 2 case, you really have to have an expert, correct?**

A. Yes, ma'am, right.

**Q. So we have to have an expert?**

A. Yeah. I mean, if you look at -- I've always said I have no problem with the County getting

representation to defend themselves, you know. But I just said but I would like for them to at least discuss resolving it and see if we could work out a plan to do a seven single-member district.

**Q. I understand. In that same paragraph you say: "If someone is willing to give me or pay me money for nothing, why not take it." But you would agree that we're defending the County in this lawsuit?**

A. I agree. Well, listen, some of that is to sell a newspaper.

**Q. I understand; I understand. And like I said, I don't take it personally.**

**Let me ask you about a little bit more serious statement, though, that follows that. Dr. Marshall asked you: "Have you received any threats?" And you say: "No, not really. Some things were written, but nothing that has dismayed me." Have you received threats regarding this lawsuit?**

A. Not directly, but indirectly with comments and things being said like: I'm the reason people are going to be furloughed. I'm the reason they're going to lay off certain people within the county. I'm the reason that one of the projects that they were going to do will not be done. So those are the kind of things. And then --

**Q. And who is saying that?**

A. Well, I know it was on one of the -- it was on WDEC because I actually called the owner and had a conversation with him about, you know, you shouldn't -- that's almost like putting a bull's eye on my back when your news reporter is reporting that. And so from time to time, I do get e-mails about, you know, I say other people are racist and you're a racist and, you know -- you know, you're trying to prevent, you're a separator, and these things. And so all of a sudden someone could take it personal that I'm fixing to cause -- don't forget the one that I'm going to make everyone's taxes go up and that kind of thing.

**Q. And what you're saying is that those were statements that were made essentially by a media outlet?**

A. Yes. And then it was something came in on a voice mail at the office in reference to that.

**Q. In reference to that report?**

A. Right.

**Q. But was the media reporting that somebody had said that these things are going to be your fault or it was the media outlet's opinion that this is what this lawsuit is going to result in, higher taxes,**

**furloughs?**

A. Well, he ended it by saying "and we all know who we will have to blame for this."

**Q. Was this in the context of a news report or an editorial by the --**

A. It was a news report.

**Q. Okay.**

A. And that's why, when I read it and saw it -- someone called me and told me, say, "Guess what they just said about you on the morning news." I said, "What?" And then they kind of told me. And then they post what they say online. And I went online and read it; and then I called the owner and said, "Listen, he ought not to be saying it like that."

**Q. I understand. Okay. I'm going to give you another article which I'm going to mark as 3.**

**(Defendant's Exhibit 3 was marked for identification.)**

**Q. (By Ms. Lewis) Again, this one, the date at the top is the day we printed it; so I think we'll have to go by the date of the pictures, which it looks like it was in October of 2014. And this is an article concerning Bill NeSmith's response, I guess, to Millard Fuller's widow's questions.**

**I want to go to the second page, if you will, Reverend Wright, and it's the second paragraph down. The second sentence says: "However, settling the matter out of court could be as little as $100,000." What would the $100,000 be for?**

A. I don't know. That's something that Ms. -- I think he got from -- that came out of Ms. Fuller's statement.

**Q. Okay.**

A. Because this -- there was -- what I think Dr. Marshall did, most of it, he took what Ms. Miller had -- what Ms. Fuller Degelmann had put in the Americus Time-Recorder and then put it over here or re-put it over here.

**Q. I see. In the fifth paragraph down, Dr. Marshall says in the second sentence: "The racial makeup of the existing public boards for various entities in our community reflects a return to the racism of the 1960s and '70s." Was that your statement or his statement?**

A. Does it start out by saying "Wright continued by saying"?

**Q. Yes. I'm sorry. That's the first sentence, and the next sentence is not really attributed to anybody.**

A. That was me.

**Q. That was you, okay. And so you believe that the 2011 plan was more like a plan from the 1960s and '70s, is that correct?**

A. Yes, ma'am.

**Q. But it was your opinion that the 1980s, '90s, and 2000 plans were good?**

A. Yes, ma'am.

**Q. Let's skip the next paragraph and go to the next paragraph that says: "Wright said that it is true that he and NeSmith discussed mediation." At the end of that paragraph, it says: "Wright said that he and NeSmith also discussed who would draw the new district lines." What did you and Mr. NeSmith discuss about that? Who would draw them?**

A. What was said between us that day -- this was during the preconference when we were having the joint -- the thing to send to the court.

**Q. Right.**

A. He said that -- we were discussing who would draw the lines if an agreement was made. We both agreed that we really, then -- it didn't really matter to me who would do them because I figured if they were all seven single-member districts they were going to pretty much mirror each other. And he said,

Well, what about -- if it happened, what about Ms. -- I forget her name from the State who drew the county original lines. And I said I don't -- I don't have an issue with her.

So that's what that was. That's what that conversation was about. But he was offering five single members and without the two at-large. And I said no, seven single members. So that's where we were on that.

**Q. And this may be obvious, but I just want to make sure we're talking about the same thing. Is the reason that you wanted seven single-member districts is because a seven single-member district plan would result in a black majority board, whereas, a five would not?**

A. Right. And it wouldn't necessarily mean that I -- let's see what was it. I think with a seven-member, it would just equally divide all the citizens in the county.

**Q. A seven-member plan?**

A. Yes.

**Q. And when you say in the next paragraph down, the last sentence, "I informed my counsel that the offer was unacceptable for obvious reasons and we have not heard any more from Mr. NeSmith about**

**settling the case," what was the obvious reason that the offer was unacceptable?**

A. Well, obvious was that I wanted seven and he was offering five.

**Q. I see. The next paragraph, Dr. Marshall says that you said that "NeSmith may be right that a Section 2 Voting Rights Act lawsuit can be hard to settle, but 'it can be settled.'" Why is it that it's hard to settle?**

A. I don't really know.

**Q. Okay.**

A. But most times, most everything is always hard. Look at us now.

**Q. Okay. Let's look at the last page, the last sentence. "We still can't understand how NeSmith got a state position after hiring a law firm that represents the governor. Could it be the reason why NeSmith opted to leave town?" So is that a statement you made?**

A. No, that's not my statement.

**Q. Okay. Because he's got it in a quote that's saying "Wright concluded by saying that."**

A. No. That's not mine.

**Q. Okay.**

A. That one is definitely not mine.

MS. LEWIS: Okay. This will be No. 4, one more article.

(Defendant's Exhibit 4 was marked for identification.)

MR. PLOWDEN: Article 3, Exhibit 4.

MS. LEWIS: There you go.

MR. PLOWDEN: Okay.

**Q. (By Ms. Lewis) I want to go to Page 2. It looks like the third paragraph from the bottom, at the very end of that paragraph, it says: "Having a fair chance for either race to become the majority on the school board is the intent of the Section 2 of the Voting Rights Act, Wright concludes." Is that a statement you made?**

A. Let me read the whole thing first.

**Q. Sure.**

A. Yeah, that was one of mine.

**Q. All right. And you believe that, correct?**

A. Yes, ma'am.

**Q. Let me ask you a little bit about the dispute between -- and I don't want to say it's you because it seems like it was perhaps the board of the local chapter of the NAACP and the national organization. My understanding from what I've read is that essentially you had a dispute about how much**

**money the local chapter was going to send to the national chapter. Is that a fair statement?**

A. Yes.

**Q. And so the local chapter essentially withdrew as a local chapter of the NAACP?**

A. Well, just that the officers resigned.

**Q. The officers resigned. So currently Sumter County does not have an operating local chapter of the NAACP, is that right?**

A. No, that's not right.

**Q. That's not right. There is one?**

A. Yes.

**Q. Okay. So who is the president or chairman of that?**

A. Me.

**Q. Okay. So is there still an organization existing called the Georgia Association for the Advancement of All People?**

A. No.

**Q. No. That's gone?**

A. Yes.

**Q. Okay. So tell me how that happened, how that situation occurred.**

A. Well, basically it was a disagreement about it. And since then, they have -- when I say

"they," the NAACP has recanted and came back and reinstated the officers.

**Q. And so how long were you not with the NAACP but with the GAAAP, I think we call it?**

A. Probably less than a year. I'm not sure exactly.

**Q. And that organization doesn't exist anymore, GAAAP?**

A. It's still exists. It just doesn't -- they coincide with both of us. They both are together. It is still there.

**Q. But is it really any different from the local chapter of the NAACP?**

A. It is different.

**Q. It is different. Does it have different officers?**

A. No. The officers are the same.

**Q. The officers are the same. Does it hold events that the local chapter of the NAACP doesn't sponsor?**

A. Yes, it does.

**Q. All right. And are you the main workhorse in that organization as well?**

A. Yes.

**Q. Does that organization have a different**

**mission than the local chapter of the NAACP?**

A. All people.

**Q. All people?**

A. Instead of saying colored people, it just says all people.

**Q. And so do you have members of GAAAP?**

A. Yes.

**Q. And do they pay dues?**

A. No.

**Q. Okay. And do you have members of all races?**

A. Yes.

**Q. Both genders?**

A. Yes.

**Q. How large do you think your membership is, you know, if you can count that, maybe along the church lines of how many come to the meetings?**

A. Let's say more than -- probably more than 200.

**Q. Does GAAAP meet regularly?**

A. Every quarter.

**Q. I want to ask you about a complaint that I -- I'm not sure you brought it to the state election board last year, but you testified at the hearing on the complaint and it had to do with Ms. Ratliff at the**

**Board of Elections. Do you remember this?**

A. Not really. I mean, over the course of time I've made several complaints about Ms. Ratliff.

**Q. So this would have been at a hearing at a meeting in Macon in February of last year when there was apparently an allegation that Ms. Ratliff made a posting on Facebook regarding the Department of Justice and the redistricting. Does that ring a bell to you?**

A. Uh-huh.

**Q. Okay.**

A. I know about that.

**Q. Okay. And was it your position that Ms. Ratliff was trying to encourage people to vote for one candidate or another?**

A. Yes, and influencing the outcome and that she was doing it while she was working and not while she was on her private time.

**Q. In your opinion was she supporting candidates or was she supporting the preclearance or not preclearance of the plan?**

A. I'm really not sure. My main complaint about that issue was that she was doing it when she shouldn't have been doing it.

**Q. And ultimately the State Board of**

**Elections dismissed that complaint?**

A. I guess they did because I never really got -- you got more about it than I do.

MS. LEWIS: All right. I'm going to mark this as Exhibit 5.

(Defendant's Exhibit 5 was marked for identification.)

**Q. (By Ms. Lewis) Exhibit 5 is a letter from AdvancED, which is part of SACS.**

MR. PLOWDEN: It is SACS.

**Q. (By Ms. Lewis) Or it is SACS. Have you ever seen this letter?**

A. I don't recall seeing it.

**Q. Well, then I'm not going to ask you any questions about it if you don't recall seeing it. Have you ever heard about it?**

A. I knew that SACS was saying that part of the reason they were doing what they were doing because the Board was in violation of the law that had been passed by the General Assembly. But as far as this particular letter, I don't recall seeing this letter.

**Q. Okay. Let me go back for a minute and talk about the discussions you had with Mr. NeSmith about settling the case. Who first offered to try to**

**resolve the case by settlement?**

A. I don't remember.

**Q. Okay.**

A. It was during that -- during that meeting and that we were together probably three hours. And we talked about a lot of things while we were there, so I don't remember how it actually came up. It was discussions about if we did do it neither one of us would be a winner, that there were going to be people on both sides saying that we were both sell-outs and that kind of thing.

**Q. You mean if you settled?**

A. In other words, that people on the board may not agree or this one may not agree. So we kind of talked about that, that it would probably be some backlash if we did come to an agreement. So it was a lot of just general talk but nothing serious.

**Q. And that was the meeting that you had to prepare the report you had to file with the court that you talked about earlier?**

A. Yes.

**Q. Okay. And did you meet with Mr. NeSmith again about settling the case?**

A. No. We haven't met again about settling.

**Q. Have you talked again? Did you talk with**

**him again, whether you met or not, on the phone or anything, or is that the only time you talked about settling?**

A. That's the only time we talked about settling.

**Q. Okay. Did you talk with anybody else at the County about settling?**

A. No, no, not directly. Not like that, no. But it has been talk about it because everybody in the county knew about it. So people have asked; and I basically say that, yes, would you be willing -- like Ms. Fuller and Senator Kirk, Greg Kirk, you know, those people have inquired, asking questions, do I want nine or do I want seven and that type stuff.

**Q. I see. Do you know Dr. Busman on the school board?**

A. Yes.

**Q. Would you say that Dr. Busman has any relationship with the black community in Sumter County?**

A. I would say he probably does.

**Q. A good one?**

A. I can't say how good. I guess like with any of us, it depends on who you're talking to. I'm sure you'll find some that say he's a great guy and

you'll find some that say he's a bad guy.

**Q. And it's probably not dependent on race, right?**

A. Right. Even with me, I don't think he's a bad guy.

**Q. I'm going to ask you some questions that have to do with the Section 2 claim. Have you ever been prohibited from registering to vote based on your race?**

A. Me?

**Q. Yes.**

A. No.

**Q. Have you ever been prohibited from participating in the political process based on your race?**

A. Only when I got arrested.

**Q. Well, and in that case you would agree that you knew that the law was that you couldn't campaign there?**

A. I didn't know it because I wanted the same treatment that Mr. Howard had received.

**Q. Right.**

A. And I was using the same explanation that they had given me.

**Q. What do you mean?**

A. When I say "they," the Secretary of State office is that it was -- it was acceptable. So I said, well, okay, if it's acceptable for him, it's got to be acceptable for me, too.

**Q. Right. But you would agree, as we discussed earlier, he was talking to the poll manager; you were holding up signs of the candidates?**

A. But when she came out, I was now talking to her.

**Q. I see; I see.**

A. It was -- it was the exact same thing, you know, to me because the issue was where we were located doing it.

**Q. Right. But you agree that he wasn't campaigning?**

A. It looked like he was campaigning to me.

**Q. How, by talking to the poll manager?**

A. Well, he was speaking to the people. I mean, we took pictures. I'm watching him. I'm standing on -- I'm standing where I'm supposed to be standing, and he's standing in the doorway. And the voters are coming and going and like he's been sheriff 20 years. Everyone know who he is. He's speaking to them. And so to me, that's campaigning.

**Q. Okay. And I think that's a little bit**

**different than what we talked about before because I think when we were talking about it before, we were talking about him talking to the poll worker or the poll manager.**

A. Right. But that's how it started and then that's what my complaint was. He made it appear that's what he was doing; but once she removed -- had the voter to come out, move the sign, then she should have told him it's time for you to leave.

**Q. I understand. Do you have any personal knowledge of discrimination by the government of Sumter County against minority citizens with respect to them participating in the political process, voting, registering to vote, running this candidate, that the government of Sumter County is somehow discriminating against minority citizens?**

A. I guess the only thing that I could relate to is when Mr. Edge filed his case back in 1971.

**Q. All right. What's your definition of racially polarized voting? What does that mean to you?**

A. Well, it's where in a district or a district where you -- the voters are -- that the black people tend to vote for a black candidate, if it's a black and a white candidate, that they will tend to

vote for the black candidate and the whites will tend to vote for the white candidate.

**Q. And I think you told me earlier about your election and then an analysis you did on a 2011 school board election regarding racial polarization. Are those the only two analysis you've really done on that?**

A. That I actually done, yes.

**Q. Do you happen to know if the Hispanic voters in Sumter County favor one race candidate over another?**

A. I can't say specifically about that.

**Q. In your opinion do black voters in Sumter County generally vote for democratic candidates?**

A. Yes.

**Q. Do you know what the block voter turnout in Sumter County was, let's say, ten years ago?**

A. No.

**Q. How about five years ago?**

A. No.

**Q. How about this year?**

A. No.

**Q. Okay.**

A. I looked, but it wasn't something that I, you know, like memorized. I looked at the results but

not to -- not to like retain them.

**Q. You would agree with me that elections in Georgia require a majority vote? You've got to win by a majority?**

A. Yes.

**Q. And there isn't any what they call single-shot voting? I mean, there's no law against single-shot voting? If you want to go in and there are 20 people on the ballot for 20 different offices, you can go in and vote for one person and leave, right?**

A. Yes.

**Q. Is there anything in the election process in Sumter County that you think discriminates against the minority group, the process?**

A. Nothing except for these last voting lines, this last new plan.

**Q. I think we talked about this earlier, but let me just make sure that I understand the question. When we were talking about slating before, you agree there's no slating process in Sumter County, right?**

A. I'm not sure. I'm really not sure.

**Q. All right. Since you've been in Sumter County a long time, would you say that most of the African Americans who live in Sumter County grew up**

**there?**

A. Yes.

**Q. When people move to Sumter County, why do you think they move there?**

A. I don't know. I really don't know. You know, I guess if you were older, you're coming to retire and it's kind of quiet. I do know some people who moved away and this was their original home and then they moved back home. As far as -- it's not many that will move there for work reasons because most of the graduates that are there move out because they're not jobs.

**Q. What's the main industry? I mean, what's the biggest employer besides the school system, probably?**

A. Probably the City and then the County and then probably Eaton and then probably Georgia Southwestern, South Georgia Tech, probably along those lines.

**Q. Do you think that there is racial discrimination in the school system of Sumter County?**

A. Not real bad, but it is some.

**Q. Like what's an example?**

A. Well, naturally, being president of the organization, I get plenty. I get plenty of

complaints. But one was we had this white female teacher who had been accused of abusing two black students, hitting them. They were primary students. The parents had complained. And then she was not discharged or disciplined, and she was wasn't reported to the Professional Standards Commission. She also was indicted by the grand jury on two counts of simple battery, and she wasn't fired. Then you had a parapro that was a black female who cursed and was fired. To me, that's, you know, discrimination.

**Q. Can you think of other examples of racial discrimination in the school system?**

A. It's some more. I would have to pull the files. I mean, it's so much stuff come through there, it's unreal.

**Q. When was that event that you just referenced?**

A. 2010 or I'll say '09, one of those years, that particular one.

**Q. What's the graduation rate in the Sumter County High School?**

A. About 70 percent.

**Q. Do you think that a lack of education -- and I mean school education, not just being educated about the world, but a lack of formal education --**

**prevents minority citizens from being involved in the election process?**

A. I don't really think so. I know a lot of older people who vote in every election that only got a third grade, you know; so I don't think so.

**Q. Do you think that with respect to employment opportunities in Sumter County that there is racial discrimination in the hiring of new employees?**

A. I don't know.

**Q. Does Sumter County have a high unemployment rate?**

A. Yes, it's kind of high.

**Q. And do you think the lack of a job keeps people from participating in the election process?**

A. I don't know it.

**Q. Do you think that there is racial discrimination in Sumter County in the provision of healthcare services?**

A. Well, I've had some complaints about it.

**Q. You have. Like what?**

A. Just the way they get treated at the hospital versus how they perceive that white patients are being treated.

**Q. And so it's a matter of perception versus**

**whether or not you can give an example of this person was treated this way and this person was treated another way?**

A. So usually, you know, just so then you call and you ask and then you try and figure out what happened.

**Q. Have you in investigating those found that there is merit to the complaint, that there's racial discrimination in the provision of healthcare services in Sumter County?**

A. Well, we have found some occasions.

**Q. Do you keep records of those things?**

A. Yeah, but I can't talk about -- the only one that I can recall, I can't talk about any right now because it's still ongoing.

**Q. It's a litigated matter?**

A. Yes.

**Q. Where the person has filed a lawsuit?**

A. Yes.

**Q. So then that's a matter of public record.**

A. Well, I guess it may be; but I don't -- once it leaves my office -- when I say "leaves my office," like if they find counsel, then we're through with it.

**Q. Do you know of any discrimination by**

**Sumter County government against county government employees? And I mean specific examples.**

A. Well, there have been complaints about it.

**Q. I understand, but I mean something you can think of here.**

A. No, not offhand.

**Q. Okay. Let me ask you about racial appeals in political campaigns. Have you witnessed that happening, where in political campaigns they'll be an emphasis on the race of the candidates? In Sumter County I'm talking about.**

A. Say that again.

**Q. In a political campaign, say, for example, a white candidate is running against a black candidate, have you seen examples of where either one of those candidates will use the race of the candidate as an issue in the campaign?**

A. No.

**Q. Would you say over the past 20 or so years that there have been a good number of African American candidates elected to various positions in Sumter County?**

A. Yes, I would say it is; it has been.

**Q. Do you know the number?**

A. Not offhand, but probably.

**Q. I wouldn't expect you to.**

A. Probably 20. But I have looked at it. But it's probably about 20 overall.

**Q. Do you think there are any needs of the African American community in Sumter County that differ somehow from the needs of white Sumter County residents in terms of needs that the Government can assist with?**

A. Yes.

**Q. What are those?**

A. Just to include them in their process, in the decision-making process. There is something called Archway there in Sumter County, and that was being sponsored by the University of Georgia. And the facilitator name was Matt something. I forget his last name. But he said in that meeting that Americus and Sumter County would not achieve their goal without reaching out and being inclusive to all of its citizens from the lowest to the highest and that if that didn't happen that what they were trying to do was not going to be successful.

**Q. Was that a complaint that was focused on the school board?**

A. No. This was just in a general meeting about some of the -- I thought your question was more

general and so --

**Q. It was; it was.**

A. And I was giving a general answer that in the black neighborhoods they feel like they're basically left out.

**Q. Of what?**

A. Of the political process, that they -- that no one really reaches out to them to hear what their complaints and concerns are.

**Q. Well, let me ask you sort of the flipside of that. Do you know that members of the minority community, do you know whether or not they meet with, say, for example, school board members about needs that they have that aren't being met?**

A. Oh, I tell them all the time. I just left a meeting personally from South Georgia Tech about that very issue on Veterans Day or the day after Veterans Day, one of those days, about literacy in the black community and trying to get some of those people to come.

**Q. Well, and you would agree with me, wouldn't you, that's important if you feel that you have unmet needs that you meet with the people who can meet those needs, correct?**

A. Correct.

**Q. And would you agree that it's probably not the case that members of the minority community take the opportunity to go and meet and talk about whatever need is not being met?**

A. No, they go fairly regular.

**Q. Are you saying that they go but no one listens?**

A. That's it.

**Q. Okay. So let's talk about you in particular. Tell me sometime that --**

MR. McDONALD: Let him finish.

**Q. (By Ms. Lewis) I'm sorry. Go ahead.**

A. A group a ministers just went two or three weeks ago about concerns that they had; and it basically appears that it, again, have fallen on deaf ears.

**Q. Where did they go?**

A. They went to the mayor and council on that particular issue.

**Q. Of Americus?**

A. Yes.

**Q. And what was the issue?**

A. About freedom of speech in the council meetings.

**Q. Is there an issue with respect to the way**

**the council meetings are being run as well?**

A. Yes.

**Q. And is it the same sort of complaints that were being lodged against the school board?**

A. Not quite, but similar.

**Q. Do you know why or do you have an opinion why the current school board plan contains the two at-large districts?**

A. None other than what I said before, to get a perceived outcome.

**Q. And the perceived outcome is?**

A. Majority white school board.

**Q. Do you know if the school board itself could change the method of election from five districts and two at-large to seven districts? The school board has authority to do that? Do you know?**

A. I don't know.

**Q. Have you ever seen the plan that Fred McBride has drawn for this litigation?**

A. Yes.

**Q. Have you ever talked to Mr. McBride?**

A. Yes.

**Q. Did you talk to him before or after he drew the plan?**

A. After.

**Q. What did you think of that plan?**

A. It was okay.

**Q. Is there anything you would have changed in it?**

A. No.

MS. LEWIS: All right. I think I just have one last thing to ask you about, and I think I'm going to be finished.

(Defendant's Exhibit 6 was marked for identification.)

**Q. (By Ms. Lewis) This is No. 6 and these are your responses to interrogatories that we served on you. And you remember reviewing these responses and signing?**

A. Yes.

**Q. Is there a verification?**

MR. TYSON: I'm not sure there is.

MS. LEWIS: Is there a verification on these, Laughlin? Do you have one? I don't see one on our copy.

MR. McDONALD: I think there is, yes.

MS. LEWIS: Okay.

**Q. (By Ms. Lewis) Let's go to Page 3 and we asked you to identify people who knew something about your complaint. We've talked about Francys Johnson**

**and Ryan Haygood and Dr. Marshall. You also name a person named Sarah Pride. Who is Sarah Pride?**

A. She is a former retired educator.

**Q. And what does she know about your case?**

A. Nothing. But she just checked it for grammar, misspelled words.

**Q. Oh, okay. She's your proofreader?**

A. Yes, yes.

**Q. Okay. Everybody needs one.**

A. That's what she did.

**Q. Okay. Now, you also list in response to that interrogatory sort of a general group of people, present and past members of the school board -- or, no, I guess that's the Board of Elections, current elected officials in Sumter County and their predecessors and elected officials in the State of Georgia, residents of Sumter County, state and federal officials of Georgia and their predecessors, current and past members of state and federal civil rights commissions, historians, political scientists, anthropologists, and other academics, and members of civil rights organizations. Is there anybody specific in that group that knows something about your case or are you saying that these are people who may know something about the subject matter of your case?**

A. That's what I'm saying. They just may know something about the subject matter.

**Q. Okay. Let's look at Page 4. We talked earlier about the issue with the school district and the valedictorian and salutatorian determinations. You also say, though -- I think it's about the eighth line down -- that OCR required a revision of policies to ensure that more than one person is involved in identifying a scholarship nominee. Did that have something to do with the valedictorian issue?**

A. Well, it came out in that where I think it was a Robert C. Byrd Scholarship, that they were not presenting it to black students to apply.

**Q. And do you know if that has changed?**

A. Yes.

**Q. Yes, it has changed?**

A. It has changed.

**Q. Okay. On the next page, Page 5, about the fourth line down -- well, you're talking about the various complaints that we've already discussed against the majority black school board and you refer to the complaint before the Southern Association of Colleges and Schools which resulted in the black board of education being placed on probation for allegedly not complying with the law. Is it your understanding**

**that the complaint about the processes that the school board was following in meetings is the only reason that the school board was placed on probation?**

A. Yes.

MS. LEWIS: I think that those are the questions I have. If you don't mind, I want to take a quick break and consult with my colleagues here. So if you don't mind, we'll just step out for a minute.

(Recess from 1:02 p.m. to 1:07 p.m.)

**Q. (By Ms. Lewis) Just a couple more questions, Reverend Wright. I asked you earlier if, you know, anybody in your immediate family had filed a lawsuit; but I may not have asked you specifically has your wife ever filed a complaint about elections that you know of?**

A. Yes.

**Q. Okay. And what is that complaint?**

A. She had gone to qualify for District 6, I believe, for a school board seat. And they told her at the time that she couldn't qualify because she wasn't in District 6. So we said okay. The complaint stemmed from when she went to vote, she was in District 6.

**Q. Was this in 2012?**

A. I can't say. It was in that area, around 2012. I think it's 2012, '10, somewhere. We vote in every election, but it was one of those elections between '10 and '12.

**Q. Okay. So she wanted to run for one of the nine school board seats?**

A. Uh-huh.

**Q. But they told her she wasn't in District 6?**

A. Right.

**Q. Did they -- and when I'm saying "they," is that somebody at the Board of Elections?**

A. Right. That was the -- that was the supervisor. That was Mr. -- or was it Ms. Ratliff at that time.

**Q. Okay.**

A. But whoever the supervisor was at that time told her that she couldn't qualify for that district because she wasn't in District 6.

**Q. Was that part of the complaint that I was talking to you about earlier with the Facebook posting, because the record from the Secretary of State's hearing on that day had also had an issue about Sumter County and somebody's challenge to somebody's qualification. Has this complaint come**

**before the state election board?**

A. I don't think so, because the investigator was just in Americus to see my wife either just before this last runoff election or just after that. So I don't think that's -- I don't think it's been heard yet.

**Q. So that's still pending?**

A. Yes, ma'am.

**Q. And let me ask you this, Reverend Wright: When she was told she's not in District 6, was the district that she was supposedly in up for election?**

A. Well, that's the district that -- right. It was up for election. It's the district that she had been voting in the whole time.

**Q. Right. But what I'm asking is: When Ms. Ratliff told her you're not in District 6, did she say, but you're in District 5, so you can qualify there?**

A. I don't think District 5 was open at that time.

**Q. Okay. And then you say that the rest of the story is, when your wife went to vote, she was in District 6?**

A. Right. They would not let her vote in 5. She had to vote in 6 or do a provisional ballot to

vote in 5.

**Q. And that's currently being investigated?**

A. Right.

**Q. All right. You told me that you had somebody proofread the complaint for you. Did you physically prepare the complaint? Did you type it yourself?**

A. Well, my wife actually -- I wrote it. All of it was hand scribble.

**Q. And who typed it?**

A. My wife typed it and then Ms. Pride proofed it.

**Q. Did Dr. Marshall have any part in physically preparing the complaint?**

A. No.

**Q. Are you paying all the costs associated with this litigation yourself?**

A. Whatever costs have been associated to this point, yes.

**Q. Right. The filing of the complaint, for example?**

A. Yes.

**Q. So while other people may have encouraged you to pursue it, nobody is helping you with the payment?**

A. Well, no one really encouraged me. It was my decision. As a matter of fact, they were all shocked when they learned that I was actually -- no one really knew until I was almost finished.

**Q. Now, when you say "they" were shocked, who do you mean?**

A. Marshall and Francys and Hargood.

**Q. Marshall and Francys and who?**

A. Hargood, whatever his name is -- Haygood.

**Q. Haygood, okay.**

A. They all were surprised because basically everyone just thought it was sort of a done deal, that it was gone, and it was --

**Q. Okay. These interviews that you had with Dr. Marshall, are those in person or on the telephone or do you guys e-mail back and forth? How do they work?**

A. They're in person.

**Q. They're in person?**

A. Uh-huh.

**Q. Have you e-mailed back and forth with Dr. Marshall about the --**

A. I do very little e-mailing.

**Q. But have you e-mailed back and forth with him?**

A. No. Not with him, no.

**Q. Or anybody about this case?**

A. No.

**Q. Let me ask you about your proposal for a resolution. My understanding is that what you want is seven single-member districts for the school board, is that correct?**

A. That's correct.

**Q. Is there any other resolution that you would consider other than seven single-member districts?**

A. Not at this time.

**Q. Okay. If the ultimate result were that there were seven single-member districts for the school board, would it be your position that there must also be seven single-member districts for the Board of Commissioners?**

A. I haven't even got that far.

**Q. Have you talked personally to any members of the Board of Elections about your lawsuit against them?**

A. Not about the lawsuit, but I have talked to them. Well, I guess it would be about the lawsuit, yes, I have.

**Q. Let me start first with who have you**

**talked to?**

A. I talked to Mr. Howard a little bit about it, and I talked to Mr. Jordan and Mr. Jones.

**Q. And these are all members of the Board of Elections?**

A. Oh, no. Those are the county commissioners.

**Q. Right. So let's go first to the Board of Elections. Have you talked to any members of the Board of Elections?**

A. No.

**Q. And let me ask a better question than that. Have you talked to any members of the Board of Elections about your lawsuit?**

A. No.

**Q. All right. Have you talked to any members of the Board of Education about your lawsuit?**

A. No.

**Q. Now, on the Board of Commissioners, you talked to Mr. Howard, Mr. Jordan, and who else?**

A. Mr. Jones.

**Q. And what did you talk to Mr. Howard about?**

A. Basically about they need to instruct you all to mediate.

**Q. Oh, you told Mr. Howard that?**

A. Yes.

**Q. Okay. So we can be doing something, right. And how about what did you talk to Mr. Jordan about?**

A. Basically the same thing. All three of them, I don't remember, but the conversation was centered around mediation.

**Q. And did you talk to Mr. Jones as well about mediation?**

A. Yes. I talked to all three of them about it.

**Q. At the same time?**

A. No. Well, I did talk to Mr. Jones and Mr. Jordan at the same time.

**Q. And when were these conversations, approximately?**

A. It was after you all had been hired.

**Q. My last question is: Have you ever thought about working with your General Assembly legislators on getting a plan changed in the General Assembly?**

A. I have had some conversation with Mr. Cheokas about it. He's a little bit more receptive when he's running for office.

MR. PLOWDEN: Who's running?

**Q. (By Ms. Lewis) When did you talk to Mr. Cheokas?**

A. The night that they had the debate at Georgia Southwestern, he and his opponent, Mr. Brown. It was after the debate. It wasn't a long conversation. It was just pretty much in brief, you know, like, hey, I need to talk to you. You know, we need to do something about all this money we're spending on this. You know, I need your help, you know. And I said -- probably shouldn't have said it. I said just like you helped them, now you need help, or, you know, you need to help us back, you know, so that kind of thing.

**Q. And did y'all plan to follow up that conversation?**

A. No. We haven't made any --

**Q. Would you say you have a good relationship with Mr. Cheokas?**

A. Yes. He and I get along well. I mean, when we see each other, we're very cordial. We speak. We talk. He always want to know how my son is doing because he's in the military. So he keeps up with him.

MS. LEWIS: All right. Well, I don't think I have any other questions. I don't know

if anybody else has any. But I thank you very much for your answers. It was a pleasure to meet you.

MR. PLOWDEN: If you will indulge me, even though my client is not a party, but it's the object of this lawsuit, to just get clarified in my mind a couple of things.

EXAMINATION

BY MR. PLOWDEN:

**Q. Reverend Wright, Ms. Lewis asked you about a meeting that was held before the plan was passed; and I'm assuming that's the 5/2 plan?**

A. Yes, sir.

**Q. And was this a school board meeting --**

A. Yes, sir.

**Q. -- that was deemed to be a public hearing for people to make comments about the plan?**

A. Yes, sir.

**Q. Okay. And you said that Jimmy Skipper only talked about the county?**

A. Right.

**Q. And that they did not discuss the school board at all?**

A. Correct.

**Q. And there was a vote before the General**

**Assembly by the Board of Education, but the grandfather clause was withheld from the black board members?**

A. Correct.

**Q. All right. And I want to explore what you're talking about as the grandfather clause, what you understand it to be.**

A. Yes, sir.

**Q. But there is a statute in the code that says if a board has more than seven members and the number of members is going to be changed, it can't be more than seven.**

A. Okay.

**Q. Is that what you're talking about?**

A. Right. And then -- and then I learned later -- because I was first pushing for nine, for it to stay nine. Then when I realized and learned that it was no way that I could have nine or we could get nine, then that's when I drew back and said let's have seven, but seven single-member districts and not five with two at-large.

**Q. Okay. Who told you you couldn't have nine?**

A. Well, they were saying according to the General Assembly had voted it in that you couldn't

have more than seven.

**Q. But the grandfather clause is that you can keep nine until there's going to be a change in the number?**

A. Right. And that's what I was arguing about with Mr. Skipper that night --

**Q. Okay.**

A. -- and about with the board members because the board members, the black board members, said if they had of known that, they never would have voted for it. They went on and voted yes to change because they were being told --

**Q. Okay.**

A. -- that they didn't have a choice because it had been passed.

**Q. So there was a vote to approve the 7-2 plan by all the board members?**

A. Yes.

**Q. It was unanimous?**

A. Right, right, the 5-2 plan.

**Q. Right. All nine of them voted for the 5-2 plan?**

A. Yes, sir.

**Q. But it's your contention that the black board members would not have voted for that had they**

**known about the grandfather clause?**

A. Yes, sir.

MR. PLOWDEN: All right.

MS. LEWIS: Anything else?

MR. McDONALD: That's it. Thank you.

MS. LEWIS: All right. Thank you very much.

(Deposition concluded at 1:21 p.m.)

(Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e), signature of the witness has been reserved.)

CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was reported as stated in the caption and the questions and answers thereto were reduced to writing by me; that the foregoing 126 pages represent a true, correct, and complete transcript of the evidence given on Thursday, November 13, 2014, by the witness, Mathis Kearse Wright, Jr., who was first duly sworn by me.

I certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); I am a Georgia Certified Court Reporter here as an independent contractor of JPA Reporting, LLC who was contacted by Anne W. Lewis, Esq. to provide court reporting services for the proceedings; I will not be taking these proceedings under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board; and by the attached disclosure form I confirm that neither I nor JPA Reporting, LLC are a party to a contract prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board.

This 22nd day of December, 2014.

_____

LINDA C. RUGGERI
CERTIFIED COURT REPORTER
GEORGIA CERTIFICATE NO. CCR-A-261

DISCLOSURE OF NO CONTRACT

I, Lynn Pyles, do hereby disclose pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that JPA Reporting, LLC was contacted by the party taking the proceedings to provide court reporting services for these proceedings and there is no contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board for the taking of these proceedings.

There is no contract to provide reporting services between JPA Reporting, LLC or any person with whom JPA Reporting, LLC has a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond our usual and customary rates have been disclosed and offered to all parties.

This 22nd day of December, 2014.

_____

LYNN PYLES, FIRM REPRESENTATIVE
JPA REPORTING, LLC

DEPOSITION OF: MATHIS KEARSE WRIGHT, JR. /LCR

I do hereby certify that I have read all questions propounded to me and all answers given by me on November 13, 2014, taken before Linda C. Ruggeri, and that:

1) There are no changes noted.
2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the deposition...with a statement of the reasons given...for making them. Accordingly, to assist you in effecting corrections, please use the form below:

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If supplemental or additional pages are necessary, please furnish same in typewriting annexed to this deposition.

MATHIS KEARSE WRIGHT, JR.

Sworn to and subscribed before me,
This the day of , 20 .

Notary Public
My commission expires:

Please forward corrections to:

JPA Reporting, LLC
1776 Peachtree Street, N.W., Suite 230-S
Atlanta, Georgia 30309
404-853-1811

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

| | | |
|---|---|---|
| MATHIS KEARSE WRIGHT, JR., | ) | |
| | ) | |
| Plaintiff, | ) | |
| | ) | |
| v. | ) | Case No. 1:14-CV-42 (WLS) |
| | ) | |
| SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION, | ) | |
| | ) | |
| Defendant, | ) | |
| | ) | |

PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

GENERAL OBJECTIONS

1. In responding to any interrogatory, or providing documents or other things pursuant hereto, Plaintiff does not admit, imply, or concede the relevance or materiality of either the information requested or of the subject matter to which the interrogatory refers, nor that it is reasonably calculated to lead to the discovery of admissible evidence. Rather, the responses are made expressly subject to, and without in any way waiving or intending to waive, any question or objection as to the competency, relevancy, privilege, or admissibility as evidence, of any of the matters referred to or responses given or documents produced.

2. These responses are accurate to the best of Plaintiff's knowledge as of this date. Plaintiff's investigation, however, is continuing and Plaintiff may obtain additional information relevant to this matter through discovery or further review of documents which Plaintiff may produce in this action. Plaintiff reserves the right to rely in this action on this subsequently discovered information.

3. These General Objections apply to each specific interrogatory or request unless



DEFENDANT'S EXHIBIT
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specifically otherwise stated. Reiteration of any General Objection in response to a specific interrogatory or request shall not be construed to limit the applicability of any other General Objection. Moreover, any attempt to answer or respond to any query to which a general objection is made does not in any way waive the objection.

4. The information sought here is not necessarily within the personal knowledge of any one person or the Plaintiff. Information necessary to respond to these matters was provided by a review of available records and other information gathered collectively from persons having knowledge of the matters discussed.

5. Because these are contention interrogatories, most of the information sought here is not within the knowledge or expertise of Plaintiff, were made by Plaintiff's counsel, and call for purely legal conclusions, or the application of law to facts, known only by the attorneys. If Plaintiff tried to answer on the basis of information received from their attorneys, it may constitute a waiver of privilege. Hence, objection is made to all such interrogatories, and the responses thereto are provided by counsel for Plaintiff.

PLAINTIFF'S RESPONSES

INTERROGATORIES

1. Identify each person who prepared or assisted in the preparation of responses to these interrogatories.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product. Without waiving its objection, Plaintiff further responds that Mathis Kearse Wright, Jr., Laughlin McDonald, and Chad M. Brock prepared or assisted in the preparation of responses to these interrogatories.

2. Identify each person who provided information or was consulted in order to complete

your responses to these interrogatories.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product. Without waiving its objection, Plaintiff further responds that Dr. Frederick McBride, Laughlin McDonald, and Chad M. Brock provided information or were consulted in order to complete the responses to these interrogatories.

3. Identify each person with knowledge of the facts alleged in the Injunction to Stop March 18, 2014 and May 20, 2014 Sumter County School Elections ("Complaint").

Answer: Plaintiff objects to this interrogatory because it is vague and overbroad, seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving his objection, Plaintiff further responds that persons with knowledge of the facts include: Rev. Dr. Francys Johnson, Georgia State Conference President; Ryan P. Haygood, NAACP Legal Defense and Educational Fund, Inc.; Dr. John Marshall, Americus, Georgia; Sarah Pride, Americus, Georgia; members, present and past, of Defendant board; current elected officials in Sumter County and the State of Georgia and their predecessors in office; residents of Sumter County and the State of Georgia; state and federal officials of Georgia and their predecessors in office; current and past members of state and federal civil rights commissions; historians, political scientists, anthropologists, and other academics; and members of civil rights organizations.

4. State all facts and identify all documents that support your contention in Paragraph 1 of the Complaint that the United States Department of Justice concluded that the grades of African American students "had been arbitrarily changed."

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the

matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving his objection, Plaintiff further responds that the Sumter County School District entered into a voluntary agreement with the U.S. Department of Education, Office for Civil Rights (OCR), on April 14, 2011, to: (1) revise its policies and procedures clarifying how and when valedictorian and salutatorian are determined; (2) develop a policy of reporting grades of students; and (3) revise its policies and procedures to ensure that more than one person is involved in identifying a scholarship nominee. Letter from Cynthia G. Pierre, Regional Director, OCR, Atlanta Office, to Mathis K. Wright, April 21, 2011; Sumter County School District Resolution Agreement, OCR Docket Number 04-09-1414.

5. State all facts and identify all documents that support your claims in Paragraph 3 of the Complaint that "White officials and special interest groups devised a redistricting plan to dilute the Black vote," that "[t]he pretext by officials was to decrease the opportunity for Black voters to participate in the political process," and that "[f]urther, the officials and their supporters took other discriminatory actions against the majority Black board and Black community."

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving his objection, Plaintiff further responds that the existing 5-2 plan for the Board of Education was adopted in 2011after Kevin Pless, a black male, defeated Donna Minich, a white female, in the election in District 3 which made the Board of Education majority black. The 5-2 plan diluted black voting strength by reducing the number of districts in which blacks were a majority and creating 2 at-large seats. A number of complaints were filed against the

majority black Board of Education: before the February 2012 Grand Jury in Sumter County; before the Georgia State Board of Education to answer complaints about not letting stake holders participate in open meetings; before the Georgia Department of Law; and before the Southern Association of Colleges and Schools which resulted in the black Board of Education being placed on probation for allegedly not complying with the law. And all black members of the Board of Education had complaints and letters sent to their employers by members of the community requesting that they be fired.

6. State all facts and identify all documents that support your claim in Paragraph 4 of the Complaint that "no Black African American has ever won a county-wide election in Sumter County, Georgia."

Answer: Plaintiff objects to this request because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving his objection, Plaintiff further responds that in June 1980, William Hoston, Sr., a black male, ran for Sheriff and became the first black to run for a county wide office in Sumter County and was defeated. In June 2000, Nelson Brown, a black male, ran for Sheriff of Sumter County and was also defeated. In June 2004, Nelson Brown again ran for Sheriff of Sumter County and was again defeated. In 1980, Arthur C. Pless became the first black elected to the Sumter County Board of Commissioners, and was elected from a majority black single member district. In November 1992, Irene King Edge and Carolyn Thomas Whitehead were elected to the Board of Education from majority black single member districts, the first black women elected to public office in Sumter County.

7. State all facts and identify all documents that support your claims that the pieces of

legislation identified in Paragraph 5 of your Complaint violate Section 2 and are racially discriminatory.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds that under the preexisting 2002 plan blacks were a majority of the TPOP in 5 (55.6%) of the 9 districts and a majority of the VAP in 3 (33.3%) of the districts. Under the existing plan, SB 154, SB 4EX, and HB 836, the number of seats was reduced to 7, with 5 members elected from SMDs and 2 elected at-large. But in the existing plan blacks are a majority in only 2 of the 5 SMDs and because the other 2 seat are elected at-large blacks are likely to elect representatives of their choice in only 2 (28.6%) of the 7 seats. The Sumter County Board of Education has a long history of discriminating against minority voters. This history is discussed in *Edge v. Sumter County School Dist.*, 541 F.Supp. 55 (M.D. Ga. 1981), *aff'd*, *Sumter County School District v. Edge*, 456 U.S. 1002 (1982), and *Edge v. Sumter County School District*, 775 F.2d 1509, 1510 (11th Cir. 1985) ("No black person has ever served on the county school board"). In 1973, the Georgia legislature adopted a plan in which all members of the Board of Education would be elected at-large. The plan was submitted to DOJ for preclearance under Section 5 of the Voting Rights Act, 42 U.S.C. § 1973c, but was objected to because it would "have a racially discriminatory effect." Letter from J. Stanley Pottinger, Assistant Attorney General, to Henry L Crisp, July 13, 1973 ("the requirement that all candidates must be voted on county-wide would result in the dilution and minimization of the voting strength of black citizens"). The objection was ignored by the Board of Education and it continued to hold at-large elections until they were enjoined by a three-judge court as violating

Section 5. *Edge*, 541 F.Supp. at 55. A new plan as enacted in 1982 but it was objected to by DOJ under Section 5 because it "fragments the black voting strength for apparently no compelling governmental reason and such fragmentation need not exist in a fairly drawn plan." Letter from Wm. Bradford Reynolds, Assistant Attorney General, to Henry L. Crisp, December 17, 1982. DOJ found that: "Our analysis also has revealed evidence of racially polarized voting, non-responsiveness on the part of the school board members to the particularized needs of the black community, and other factors which, in the context of a history of racial discrimination in the county, increase the likelihood that the proposed redistricting plan will deny black voters an equal opportunity to elect representatives of their choice." *Id.* DOJ further concluded that the evidence "suggests that the submitted plan was designed with the purpose of minimizing minority voting strength in the school district," and "it appears that the board consciously did not consider the alternative plan proposed by the ACLU because of racial considerations and similarly did not obtain or seek input from the minority community." *Id.* The board submitted a second plan but it was also objected to by DOJ, which concluded that "the present proposal fails to offer black voters a realistic opportunity to elect candidates of their choice," and that it was unable to conclude "in light of the continuing exclusion of effective participation by black citizens and their representatives in the redistricting process, that this discriminatory result was unintended." Letter from Wm. Bradford Reynolds, Assistant Attorney General, to Henry L. Crisp, September 6, 1983. Defendant can find additional information it seeks in the expert report submitted by Dr. Frederick McBride, a copy of which has been provided Defendant. Plaintiff further responds that some of the information Defendant seeks is available in state laws, court decisions, and newspaper articles reporting on racial discrimination in Sumter County. Plaintiff is in the process of compiling this and other information it finds to be relevant and will provide it

to Defendant at such time as the compilation is completed. The United States Census for Sumter County demonstrates that African-Americans have a lower socio-economic status that hinders their ability to participate equally with other residents in the political process in Sumter County or electing candidates of their choice. The Census is as available to Defendant as to Plaintiff, and may be accessed by Defendant online. The legislative history of the Voting Rights Act of 1965, and its subsequent amendments in 1970, 1975, 1982, and 2006, also support the proposition that blacks in Sumter County have been, or are, subjected to private and public discrimination on the basis of race or in attempting to exercise their right of franchise and to participate equally in the political process. The legislative history of the Voting Rights Act of 1965, and its subsequent amendments in 1970, 1975, 1982, and 2006, are as available and accessible to Defendant as to Plaintiff.

8. State all facts and identify all documents that demonstrate that the Board of Education plan "would group sufficiently large Black populations which would concentrate the Black majority in a single-member district," as alleged in Paragraph 7 of the complaint.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds by incorporating his answer to Interrogatory No. 7 into the answer to this interrogatory. Plaintiff further responds that the United States Census for Sumter County contains information about the African American population in Sumter County and is as available to Defendant as to Plaintiff, and may be accessed by Defendant online.

9. State all facts and identify all documents in your possession that support your claim in

Paragraph 8 of the Complaint that racially-polarized voting exists in Sumter County.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds that Defendant can find some of the information it seeks in the expert report submitted by Dr. Frederick McBride, a copy of which has been provided Defendant. Returns of elections in which residents of Sumter County voted further support the proposition that racially-polarized voting exists in Sumter County. These returns are already in the possession of Defendant.

10. What is the method you used to determine which of the candidates in local elections are preferred by the "Black population," as referenced in the Paragraph 9 of the Complaint?

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds that Defendant can find some of the information it seeks in the expert report submitted by Dr. Frederick McBride, a copy of which has been provided Defendant. Returns of elections in which residents of Sumter County voted further shows which of the candidates in local elections are preferred by the Black population. These returns are already in the possession of Defendant

11. State all facts and identify all documents which demonstrate the Board of Education plan will "compress minority communities into a small number of districts" or "spread then thinly into a large number of districts," as alleged in Paragraph 10 of the Complaint.

Answer: Plaintiff objects to this interrogatory request because it seeks attorney work

product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds that Senate Bill 154 and Senate Bill 4EX signed into law by Governor Deal on September 21, 2011, and House Bill 836 signed into law by Governor Deal on February 25, 2014, demonstrate that the Board of Education plan will compress minority communities into a small number of districts, *i.e.*, 2 SMDs, or spread then thinly into a large number of districts, *i.e.*, 2 at-large districts. These bills are as available to Defendant as to Plaintiff.

12. Do you contend that the Board of Education plan "pack[s]" or "crack[s]" the African -American community in Sumter County?

Answer: Yes.

13. If you contend the Board of Education plan "packs" the African-American community in Sumter County, identify the districts which are "packed."

Answer: District 1 (65.9% black TPOP) and District 5 (72.8% black TPOP).

14. If you contend the Board of Education plan "cracks" the African-American community in Sumter County, identify the district which are formed as the result of "cracking."

Answer: African-Americans are "cracked" in District 2 (30.3% BVAP), District 3 (36.2% BVAP), District 4 (43.9% BVAP), and the 2 at-large districts.

15. State all facts and identify all documents which support your allegations in Paragraph 11 of the Complaint that there is a "history of official voting-related discriminatory practices" in Sumter County?

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to

Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds by incorporating his answer to Interrogatory No. 7 into the answer to this interrogatory.

16. Regarding the allegations of Paragraph 11 of the Complaint, state the specific practices used, detail the incidents in which allegedly-discriminatory practices were used to "discriminate and obstruct Blacks and other minorities from the right to vote and select candidates of their choice," and identify all documents supporting the existence of the practices and incidents you identify.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds by incorporating his answer to Interrogatory No. 7 into the answer to this interrogatory.

17. State all facts and identify all documents which support your allegation in Paragraph 13 of the Complaint that the Board of Education is a "bullet voting scheme."

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds by incorporating his answer to Interrogatory No. 7 into the answer to this interrogatory.

18. State all facts and identify all documents which support your allegation in Paragraph 14 of the Complaint that the Board of Education is a "form of candidate slating."

Answer: Plaintiff objects to this interrogatory because it seeks attorney work

product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving this objection, Plaintiff further responds that under the present system members are moved from the districts in which they were elected to new districts, *i.e.*: Kelvin Pless from District 3 under the 9 SMD plan to District 3 under the 5-2 plan; Willa Fitzpatrick from District 4 under the 9 SMD plan to District 3 under the 5-2 plan; Edith Ann Green from District 8 under the 9 SMD plan to District 5 under the 5-2 plan; Alice Green from District 9 under the 9 SMD plan to District 1 under the 5-2 plan; Michael Mock from District 6 under the 9 SMD plan to District 1 under the 5-2 plan; Meda Krenson from District 2 under the 9 SMD plan to District 2 under the 5-2 plan; Michael Busman from District 5 under the 9 SMD plan to District 3 under the 5-2 plan. The new plan also reduced the size of the Board of Education from 9 members to 7 members and will reduce the number and percentage of black members.

19. State all facts and identify all documents which support your allegation in Paragraph 15 that "Black African Americans and other minority groups members bear the effects of discrimination in the areas of education, employment, health, social and human rights, which hinder their ability to participate effectively in the political process."

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving its objection, Plaintiff further responds by incorporating his answer to Interrogatory No. 7 into the answer to this interrogatory and by noting that the report of Dr. Frederic McBride discusses the depressed socio-economic status of blacks in Sumter County. The United States Census for Sumter County demonstrates that African-Americans have a lower

socio-economic status that hinders their ability to participate equally with other residents in the political process in Sumter County or electing candidates of their choice. The Census is as available to Defendant as to Plaintiff, and may be accessed by Defendant online.

20. State all facts and identify all documents which support your allegation in Paragraph 16 of the Complaint that "Local Caucasian officials only sought to redo district lines after the school board became a Black majority board after the November election in 2010."

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product, the matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving its objection, Plaintiff further responds by incorporating into his answer the answers to Interrogatories 5, 7, and 11. Plaintiff further notes that SB 154 and SB 4EX were sponsored by former Senator George Hooks, a white resident of Sumter County, and HB 836 was sponsored by Representative Michael Cheokas, a white resident of Sumter County.

21. Identify all plans for the Board of Education or County Commission districts in Sumter County, Georgia prepared on your behalf.

Answer: Plaintiff objects to this interrogatory because it seeks attorney work product. Without waiving this objection, at the time of filing the complaint no one had prepared any plans for Plaintiff, but he made his own plans from existing plans and maps. Plaintiff further responds that Defendant can find the information it seeks in the expert report submitted by Dr. Frederick McBride, a copy of which has been provided Defendant.

22. Identify all plans for the Board of Education or County Commission districts in Sumter County, Georgia following the 2010 Census.

Answer: Plaintiff objects to this request because it seeks attorney work product, the

matter sought to be discovered is a matter of public record, the matter is as accessible to Defendant as to Plaintiff, and Defendant seeks to have Plaintiff do its legal research for it. Without waiving its objection, Plaintiff further responds that plans drawn following the 2010 Census are described in Senate Bill 154 and Senate Bill 4EX signed into law by Governor Deal on September 21, 2011, and House Bill 836 signed into law by Governor Deal on February 25, 2014. Plaintiff also made plans from existing plans and maps, and a plan prepared by Dr. Frederick McBride is contained in his expert report, a copy of which has been provided Defendant.

23. Identify all experts you plan to have testify at trial.

Answer: At the present time Plaintiff plans to have Dr. Frederick McBride testify as an expert at trial.

This 8th day of September 2014.

s/M. Laughlin McDonald

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