STATE OF NORTH CAROLI A I T E GENERAL COURT OF JUSTICE
COUNTY OF WAKE SUPERIOR COURT DIVISION
Case No. 19 CVS 014001

COMMON CAUSE; et al.,

Plaintiff,

vs.

DAVID R. LEWIS, et al.,

Defendants.

_____/

DEPOSITION OF L. NICOLE QUICK

May 16, 2019

10:01 a.m.

* * *

Taken by the Defendants

At Poyner Spruill, LLP
301 Fayetteville Street, Suite 1900
Raleigh, North Carolina

Legislative Defendants Trial

Ex. 322

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1 P R O C E E D I N G S
2 L. NICOLE QUICK,
3 having been duly sworn, testifies as follows:
4 EXAMINATION
5 BY MS. RIGGINS:
6 Q. Good morning, Ms. Quick. We met a little
7 bit earlier, but just to remind you, my name is
8 Alyssa Riggins, and I represent the legislative
9 defendants in a case styled Common Cause versus
10 Lewis, that's pending right there in Wake County
11 Superior Court.
12 I assume you're very familiar with this
13 case?
14 A. Yes.
15 Q. Could you please state your full name for
16 the record?
17 A. Lily Nicole Quick.
18 Q. And have you ever gone by any other name?
19 A. Lily Nicole Ward.
20 Q. And you go by Nicole now, correct?
21 A. Yes.
22 Q. And have you ever been deposed before?
23 A. No.
24 Q. Well, since this is your first deposition,
25 I'd like to go over some ground rules with you. I'm

1 going to do my very best to ask questions that are
2 clear and concise, but if I don't succeed, please let
3 me know and I'm happy to rephrase anything.
4 Part of taking a deposition is that the
5 court reporter here is taking down everything that we
6 say. So I know that it's easy, in a conversation, to
7 slip into nodding heads or "uh-huh" or "huh-uh," but
8 please give full verbal responses so that the court
9 reporter can get everything down.
10 I'm also going to do my very best not to
11 interrupt you, because it's really hard for the court
12 reporter to get down two people at once. So I'd ask
13 that you let me please get out my full question
14 before you answer, and I will let you get out your
15 full answer before I ask another question.
16 Lastly, this is definitely not an endurance
17 test. So if you need a break at any point, just let
18 me know. I'm happy to take a break. My only thing
19 is, if there is a question pending, I'd ask that you
20 answer the question before we take a break.
21 A. Okay.
22 Q. Sound fair?
23 A. Yes.
24 Q. Is there anything that would prevent you
25 from answering my questions honestly and completely

1 today?
2 A. No.
3 Q. Have you ever been a witness in a case
4 before?
5 A. Yes.
6 Q. You have? Which cases?
7 A. I had a traffic accident maybe 18 years
8 ago.
9 Q. And so I guess that's kind of my next
10 question.
11 Were you a party to that lawsuit?
12 A. Yes.
13 Q. And is that the only lawsuit you've ever
14 been a party to?
15 A. Yes.
16 MS. D'AMICO: Clarification: Besides this
17 one?
18 MS. RIGGINS: Right. Besides this one,
19 yes.
20 BY MS. RIGGINS:
21 Q. Have you ever been a party to an
22 administrative action?
23 A. I don't know what that is.
24 Q. Have you ever been a party to a complaint
25 with a state agency?

A. No.

Q. Have you ever made a complaint to the State Board of Elections?

A. I filed a residency challenge against a candidate.

Would that count?

Q. Yes. That would count.

A. Okay.

Q. Can you tell me a little bit about that?

A. That was after the redistricting lines were redrawn last time, in the end of 2017. We did not -- no longer had a representative in our district, but a gentleman moved into our district to run for the seat there, and he was still living in another district but his parents owned real estate in the district I was in, so he wasn't actually living there.

Q. Was your -- go ahead.

A. So I filed a residency challenge.

Q. Okay. And was your challenge successful?

A. No.

Q. So what is your current address?

A. 4338 Clovelly Drive, Greensboro, North Carolina.

Q. And is that 27403, the ZIP code?

A. 27406.

Q. Okay. And how long have you lived there?
A. 20 years.
Q. And how would you characterize your neighborhood? Is it urban? Suburban? Rural?
A. It's suburban, just outside the city limits, probably about to be annexed.
Q. Outside of Greensboro?
A. Uh-huh. Yes. Sorry.
Q. That's okay.
And do you know what House district you're currently in?
A. 59.
Q. Do you happen to know what precinct you live in?
A. Jeff 3.
Q. I'm very impressed. That is very impressive.
To your knowledge, in the -- about 20 years that you've lived on Clovelly Drive, has your precinct always stayed the same?
A. Yes.
Q. And prior to Clovelly Drive, where did you live?
A. I lived on North Oaks Drive in northwest Greensboro.

1 Q. Do you recall what House district that was
2 in?
3 A. I do not, precisely.
4 Q. Totally fine. This is not a memory test.
5 And before that address in northwest
6 Greensboro, where did you live?
7 A. Supply, North Carolina.
8 Q. Okay. And how long did you live there?
9 A. I lived there with my parents through
10 college.
11 Q. And are you currently employed?
12 A. No. I'm a homemaker.
13 Q. And how long have you been doing that?
14 A. For 15 years.
15 Q. And prior to that, what did you do?
16 A. I was a lien management specialist.
17 Q. What is a lien management specialist?
18 A. I looked for ways to streamline the supply
19 chain and cut costs.
20 Q. All right. Very cool.
21 What did you do to prepare for your
22 deposition today?
23 A. I read over the complaint, and I spoke
24 briefly with my attorneys.
25 Q. Which attorneys did you speak with?

A. With Sara and with John --

MS. D'AMICO: Robinson.

THE WITNESS: Thank you.

BY MS. RIGGINS:

Q. And did you review any documents during your phone calls with them, other than the complaint?

A. We looked briefly at a generic map of the county districts.

Q. And did you bring any documents with you?

A. No.

Q. How did you first get involved as a plaintiff in this case?

A. The attorneys contacted me.

Q. And when you say, "the attorneys" which attorneys would that be?

A. It was Sara, specifically.

Q. And do you remember about when that was?

A. It was late October, early November last year.

Q. Okay.

A. I don't recall the specific date.

Q. And do you know some other plaintiffs in this case?

A. I do know Joshua Brown.

Q. Anyone else?

1 A. I do not believe so.
2 Q. And did you recruit Mr. Brown to be a
3 plaintiff in this case?
4 A. I did.
5 MS. RIGGINS: So I'm going to hand you an
6 exhibit out of this lovely stack. It might take
7 me just a minute to find it. We're going to
8 discuss it a little bit. So we'll mark it as
9 Exhibit 1.
10 (EXHIBIT NO. 1 MARKED FOR IDENTIFICATION.)
11 BY MS. RIGGINS:
12 Q. I'll give you a minute to look over the
13 first page.
14 Is this your -- one of your Facebook pages?
15 A. Yes, it is.
16 Q. And does it look like this is a post that
17 you made on your GCDP chair page?
18 A. It does.
19 Q. And it looks like you're linking to an
20 article about this lawsuit; is that correct?
21 A. Yes. It appears so.
22 Q. And what is the date on your post?
23 A. November 16, 2018.
24 Q. So that was about three days after the
25 complaint was filed. Does that sound about right to

1 you?
2 A. I suppose so.
3 Q. So I heard you mention earlier that the
4 last round of redistricting took place in 2017. So
5 why did you choose to bring this suit a year later,
6 in November?
7 A. Well, the lines were finally decided near
8 the -- in December of 2017. I realized, after Jon
9 Hardister moved into my district or tried to
10 establish residence in my district to run, that we
11 did not have a Democrat in the district, that the
12 district was going to be Republican-dominated.
13 He ran. He won. And previously, my
14 representative was Amos Quick, who is a Democrat, and
15 I could call him if I had an issue and he would
16 return my calls, and he was very responsive.
17 And in fact, I called him on a particular
18 issue I was concerned about, and he signed on as a
19 co-sponsor of a bill after I spoke with him.
20 Since Representative Hardister has been my
21 representative, I don't get that response.
22 Q. Okay. And Representative Hardister started
23 representing you January 1st of 2019, correct, so
24 after the 2018 elections?
25 A. Yes. I don't know the exact date they

1 take --
2 Q. Right. So again, almost -- okay.
3 Do you think -- since the districts were
4 finalized at the end of 2017, and then the suit was
5 brought in November of 2018, do you think the timing
6 of the suit had anything to do with the 2018
7 elections?
8 A. You mean because it was filed a day
9 after -- it was near the elections?
10 Q. It was after the elections.
11 A. Okay.
12 Q. Do you think that there was a specific
13 reason for waiting until after the election was
14 filed?
15 A. I have no idea.
16 Q. Do you think that it was a factor in the
17 timing of the lawsuit, to wait until after the 2018
18 elections in November?
19 A. I couldn't speculate as to what the intent
20 was.
21 Q. Okay. So I've attached, on the back of the
22 Facebook post, the article that the post linked to.
23 Would you mind turning to the second page
24 of that article? On the top it will say "two of"
25 however many pages.

1 So there's a paragraph under the images,
2 and I'd like to draw your attention to the third
3 sentence of that first paragraph. And it says, "Now
4 voting rights advocates are poised to score a legal
5 victory in North Carolina that could wipe out the
6 GOP's legislative gerrymander with the help of civil
7 rights attorney, Anita Earls, who was elected to the
8 state Supreme Court last week."
9 Were you aware that Ms. Earls was running
10 for Supreme Court?
11 A. Yes.
12 Q. And were you aware that the Supreme Court
13 election in November of 2018 would determine the
14 balance -- the partisan balance of the North Carolina
15 Supreme Court?
16 A. I'm not sure.
17 Q. Okay. Would you mind turning to page seven
18 of 12, on the top right corner.
19 A. Okay.
20 Q. So the second paragraph on that page says,
21 "As a result" -- I'll represent to you, they're
22 talking about the election -- "Democrats will soon
23 hold a 5-2 majority on the court. And when Earls
24 played" -- I'm sorry -- "and Earls played a major
25 role, challenging earlier GOP gerrymandering. When

she announced her candidacy, earls declared that she sought to shield 'the right of all citizens to cast a ballot that is counted equally,' a clear reference to partisan gerrymandering.

"There is no reason to doubt that she and her Democratic colleagues on the court will be prepared to invalidate the current legislative map when this case reaches their docket."

So after seeing these things in this article, do you think it's possible that the lawsuit was waited to be filed until after the outcome of the North Carolina Supreme Court election was decided?

MS. D'AMICO: Objection. Calls for speculation.

BY MS. RIGGINS:

Q. Do you think that this article indicates that the suit will be more likely to succeed at the appellate level with Ms. Earls on the court?

A. I believe that's what the article is suggesting.

Q. Okay. And as a result, because Ms. Earls was elected to the court in 2018, the success of this case, in part, depended on the outcome of the 2018 elections?

MS. D'AMICO: Objection. Speculation.

1 BY MS. RIGGINS:
2 Q. Is that what the article seems to indicate?
3 A. I suppose it does, yes.
4 Q. Let's turn back to page two.
5 So going back to that second paragraph, now
6 the fourth sentence, it says "The case" -- that's
7 referring to this case -- "could give Democrats a
8 real shot at retaking the legislature in 2020."
9 Was that part of your understanding of why
10 you were joining this lawsuit?
11 A. No. I'm sorry, I'm not -- oh, there it is.
12 Okay. I found the sentence.
13 No, that wasn't my understanding.
14 Q. Okay. So did you read this article before
15 you shared it on your Facebook page?
16 A. Probably.
17 Q. And do you generally share things that you
18 agree with the points of view, on your Facebook page?
19 A. On that particular page, I tend to share
20 things that would be of interest to our county party.
21 Q. Okay.
22 A. So they generally agree with party
23 messaging, which can or -- may or may not be exactly
24 in line with my personal opinions.
25 Q. Okay. And so you thought that the

1 information contained in this article would align
2 with the party's messaging and be of interest to the
3 party?
4 A. Sure.
5 Q. When you say, "the party," can you clarify
6 what you mean?
7 A. I'm sorry, with the Democratic Party. This
8 is my page for the Guilford County Democratic Party
9 county chair.
10 Q. Okay. Thank you. I'm going to let you put
11 it aside now.
12 A. Okay.
13 Q. So I believe you said that you knew and
14 recruited another plaintiff in this case?
15 A. Yes.
16 Q. Josh Brown?
17 A. Yes.
18 Q. How do you know Mr. Brown?
19 A. I know Mr. Brown because he also served as
20 an officer in the county party.
21 Q. And that's the Guilford County party,
22 correct?
23 A. Yes.
24 Q. So have you discussed this case and the
25 allegations this case is based on, with Mr. Brown?

A. No.

Q. No?

A. No.

Q. So when you were recruiting him to be a plaintiff in this lawsuit, you didn't discuss partisan gerrymandering?

A. I said to him, "There is a case" -- yes, but that was the extent of it. I said, "There is a case on partisan gerrymandering. The attorneys are looking for people to sign on as plaintiffs. Would you be willing to do that?"

Q. And do you remember what form this communication took place?

A. It was a phone call.

Q. Okay. Do you know who is paying your attorneys' fees in this case?

A. I have no idea.

Q. So it's not you?

A. No. I don't have that kind of money. I don't have money.

Q. Do you recall receiving requests for production of documents related to this case?

A. Yes.

Q. Do you recall if you produced any documents in this case?

A. I did.

Q. You did? Okay.

So what did you do to look for responsive documents?

A. I searched my laptop.

Q. Okay. How did you search your laptop?

A. I looked for gerrymandering in my finder app, and I went through my e-mails.

Q. And when you say you went through your e-mails, would that be a specific e-mail account?

A. Yes.

Q. And what e-mail account is that?

A. Nicolewardquick@gmail.com.

Q. Do you have any other e-mail addresses?

A. I had a prior e-mail address, but that account crashed in the -- in September of 2018. And I no longer have access to it.

Q. And it's your position that you turned over -- strike that.

And you found responsive documents on your computer and in your e-mails?

A. In my e-mails, yes.

Q. And did you turn those documents over to counsel?

A. Yes.

1 MS. RIGGINS: Counsel, we didn't receive
2 those documents.
3 MS. D'AMICO: I believe you received the
4 privilege log that indicated that the documents
5 that Ms. Quick found and turned over to us were
6 all privileged material.
7 BY MS. RIGGINS:
8 Q. Okay. Do you receive newsletters from any
9 Democratic Party or entity?
10 A. Yes.
11 Q. So what about newsletters from the North
12 Carolina Democratic Party?
13 A. I receive links to news clips.
14 Q. Okay. And I know that you're the chair of
15 the Guilford County Democratic Party.
16 Do you also -- in addition to probably
17 sending those communications, do you also receive
18 them?
19 A. I'm sorry, was that not the question I just
20 answered? I receive news clips from the state party.
21 Q. Right. But do you receive communications
22 from the Guilford County Democratic Party?
23 A. I am the Guilford County Democratic Party,
24 so sure, from other people on my board, I guess.
25 Q. Do you -- are you aware if the Guilford

1 County Democratic Party sends out newsletters or
2 large summary-type e-mails?
3 A. We do send an e-blast, yes.
4 Q. About how often do you do that?
5 A. Weekly, usually.
6 Q. And you receive those e-mails?
7 A. Yes.
8 Q. And do any of those e-mails discuss
9 gerrymandering?
10 A. Maybe. I don't know.
11 Q. Would any of those e-mails discuss
12 redistricting?
13 A. They may have links to articles.
14 Q. And so would any of the e-mails have
15 discussed this case potentially?
16 A. I don't recall.
17 Q. Don't recall?
18 So is gerrymandering the only term that you
19 searched your e-mails for?
20 MS. D'AMICO: Objection. Attorney-client
21 privilege with regard to what search terms she
22 was instructed to use.
23 MS. RIGGINS: You're required to turn over
24 search terms upon asking. It's the rules in
25 North Carolina. In fact, we have a court order

1 that says as much.
2 MS. MEEKER: You can ask the attorney some
3 other time. I don't think you can ask the
4 deponent what she asked the witness to do.
5 BY MS. RIGGINS:
6 Q. Did you receive search terms from your
7 counsel?
8 A. Yes.
9 Q. Did you see the requests that were made to
10 produce responsive documents on behalf of the
11 legislative defendants?
12 A. Did I see the request?
13 Q. Did you see the requests that were issued
14 to you?
15 A. Yes.
16 Q. And was it your understanding, based on
17 those requests, that the documents sought only had to
18 do with gerrymandering?
19 A. I don't recall specifically, no. I would
20 have to go back through my e-mail to confirm.
21 Q. Remind me again, you said your triad.rr.com
22 e-mail address crashed when?
23 A. September 2018.
24 Q. And you said that you received, like, news
25 blasts or links to news articles from the NCDP?

A. Right.

MS. RIGGINS: Okay. So I'm going to mark this as Exhibit 2.

(EXHIBIT NO. 2 MARKED FOR IDENTIFICATION.)

BY MS. RIGGINS:

Q. Would this be -- and I know this is from November 11th of 2018.

Would this be something similar to what you would have received from the NCDP?

A. This is April 11th. Did you say November?

Q. I'm sorry, it does. It says April 11th. Yes.

I know this was from before your e-mail account crashed, but was this something similar to what you would have received from the North Carolina Democratic Party?

A. Yes.

Q. And so to the extent that the North Carolina Democratic Party sent e-mail blasts or newsletters like this to your new Gmail account, you would have those?

A. I don't save them. They go to my communications director as well, and he scans them and finds something interesting to share in our social media. I generally don't have the time to

1 read them. So I let him handle that.
2 Q. Do you delete the e-mails out of your
3 account, after you send them to your communications
4 director?
5 A. Well, they go to him directly. He's copied
6 on these as well.
7 Q. Okay. But in your e-mail, do you delete
8 them?
9 A. Yes.
10 Q. About how often do you delete these
11 e-mails?
12 A. I don't know. I'm probably not consistent.
13 Q. I'm not either. Just being honest with
14 you.
15 Okay. To the extent that the North
16 Carolina Democratic Party sent e-mails like this,
17 that you received that have to do with this case or
18 gerrymandering or redistricting or other things
19 relevant to this case, you might still have them in
20 your Gmail account, depending on whether you've
21 deleted them or not?
22 A. Yeah. Sure.
23 Are we done with this one?
24 Q. Yes.
25 MS. RIGGINS: We'll mark this as Exhibit 3.

1 (EXHIBIT NO. 3 MARKED FOR IDENTIFICATION.)
2 BY MS. RIGGINS:
3 Q. So I see that this is a -- it looks like a
4 Guilford County Democratic Party newsletter, and this
5 was sent in November of 2017.
6 I'll give you minute to flip through it if
7 you'd like. The last couple pages are ads -- have a
8 lot of ads in them. Sorry about that.
9 So does this look like a typical newsletter
10 that Guilford County might send out?
11 A. At one time, sure.
12 Q. So have you changed, maybe, the formatting?
13 A. Yeah.
14 Q. But the content and stuff like that is
15 typical of what you might see?
16 A. Yes, I believe the way it goes out now,
17 there are just links. So it's not all of the
18 information, because we've shortened it, I think.
19 Q. It's not 23 pages when you print it?
20 A. Yeah. You'd have to actually click through
21 to go to something.
22 Q. Seems very efficient.
23 So is it safe to say that these newsletters
24 contain information about cases involving Democrats,
25 to the extent they're ongoing, or ongoing

1 redistricting litigation sometimes?
2 A. They contain things in the news that might
3 be relevant to Democrats, regardless of what that is.
4 Q. Okay. And would the newsletters sometimes
5 contain information about signing up to canvass or
6 volunteer for certain candidates, maybe?
7 A. Yeah.
8 Q. Okay. And would you say that, in your
9 Gmail account, you still have some of these Guilford
10 County Democratic newsletters?
11 A. Well, not from November 2017.
12 Q. But you have Guilford County Democratic
13 newsletters, potentially?
14 A. Probably.
15 Q. And I know that you mentioned that your
16 other e-mail address crashed in the fall of 2017.
17 What efforts did you make to recover that
18 e-mail account?
19 A. I went -- it was a RoadRunner account and
20 it stopped receiving e-mails, because, for some
21 reason, they were having issues with me being over
22 number, and I went to their server and tried to
23 delete e-mails from their server, but I continued to
24 have problems with those downloading to my Outlook
25 file.

1 So we were considering switching providers
2 anyway because, we had had other issues with
3 RoadRunner and with our cable service that was tied
4 in with it. So I ended up closing out the account.
5 Q. Okay. And in conjunction with searching
6 for documents in this case, did you contact the
7 e-mail provider to see if any of your e-mails were
8 stored somewhere where you could have access to them?
9 A. I did not.
10 Q. Did you look for -- this is an old school
11 question. I'm going to preface this: Did you look
12 to see if you had any hard copy files that might be
13 responsive to that document request?
14 A. I don't keep things.
15 Q. Yeah. I totally understand.
16 A. I'm sorry.
17 Q. So I know we've looked at one of your
18 social media accounts for your party chair Facebook
19 page.
20 Do you have other social media accounts?
21 A. I have a personal one.
22 Q. A personal Facebook account?
23 A. Yes.
24 Q. What about other social media?
25 A. I have a Twitter account.

1 Q. Anything else? I know there's so many
2 sites these days.
3 A. No, I don't think so.
4 Q. And on these social media accounts --
5 either on your Guilford County chair page, your
6 personal page, or your Twitter -- do you think you've
7 discussed gerrymandering?
8 A. In the fall of 2017, I did, I believe,
9 because our -- one of our board members was
10 interviewed for a podcast related to congressional
11 gerrymandering and the division of our county into
12 two districts, so I shared that at the time, I
13 believe.
14 Q. And do you remember if you shared it on
15 your chair page or your personal page?
16 A. Probably both.
17 Q. What about your Twitter?
18 A. I may or may not have. I'm not as active
19 on Twitter.
20 Q. So I think you spoke a little bit about the
21 gerrymandering post, and that was in regards to
22 redistricting?
23 A. The congressional redistricting, yes.
24 Q. Have you also posted about redistricting in
25 general, congressional or legislative?

1 A. At that time, possibly, yes.
2 Q. What about candidate fundraisers?
3 A. Yes.
4 Q. Recruiting candidates to run?
5 A. Yes.
6 Q. Would these be on your personal and
7 Guilford County party page?
8 A. Mostly on the party page.
9 Q. But some on your personal, depending?
10 A. Maybe.
11 Q. Okay.
12 A. Sorry.
13 Q. That's fine.
14 Do you recall searching your social media
15 accounts for posts that would be responsive to those
16 discovery requests?
17 A. I did not. It did not occur to me.
18 Q. And you said you received a copy of those
19 discovery requests?
20 A. Yes.
21 Q. Do you recall that there was a discovery
22 request that specifically asked for social media
23 posts?
24 A. I believe there may have been. I believe I
25 interpreted that to mean from the point that the case

1 was filed and I became involved with it, not 2017.
2 Q. Would it help refresh your recollection if
3 I gave you a copy of those responses to those
4 discovery requests?
5 A. Sure.
6 (EXHIBIT NO. 4 MARKED FOR IDENTIFICATION.)
7 BY MS. RIGGINS:
8 Q. So let's turn to page 11. And it says
9 "Request number eight." It says, "Copies of all
10 social media posts by you that relate to, reflect, or
11 reference any of the allegations or claims you have
12 made in this lawsuit."
13 And then you see a response below it with
14 some objections, and then it says, "Subject to and
15 without waiving the forgoing objections, plaintiff
16 will produce relevant and responsive non-privileged
17 documents within plaintiff's possession, custody, or
18 control, responsive to this request."
19 So are the claims you've made in this
20 lawsuit related to gerrymandering?
21 A. Yes.
22 Q. Are they relating to redistricting?
23 A. Yes.
24 Q. And I think we saw -- it's Exhibit 1 --
25 earlier, you made a post regarding this lawsuit,

1 correct?
2 A. Yes.
3 Q. But none of those were produced to your
4 attorneys?
5 A. It was not.
6 MS. RIGGINS: Counsel, we'll follow up
7 about that later.
8 MS. D'AMICO: Sounds good.
9 BY MS. RIGGINS:
10 Q. Let's turn away from social media, as fun
11 as it may be, for now.
12 I'm going to go out on a limb and assume
13 you're a registered voter?
14 A. Yes.
15 Q. And do you recall when you first registered
16 to vote?
17 A. Not specifically. Soon after I was able
18 to, probably.
19 Q. And since you've registered to vote, you
20 voted in most every election?
21 A. All of the federal and state-level ones.
22 I've probably missed a few of the municipal, local
23 ones.
24 Q. Have you -- do you recall if you've voted
25 in every state and federal election since 2006?

1 A. I think I missed 2010.
2 Q. Okay. Why do you think you missed 2010?
3 A. We were going through some personal things.
4 My father-in-law was dying of cancer and we were
5 moving him from Florida.
6 Q. Sorry to hear that.
7 Do you also vote in the primaries?
8 A. I do now. I haven't always been as
9 consistent.
10 Q. It's hard because they're not on a set
11 date. You're not always expecting them to come up.
12 A. Right.
13 Q. In North Carolina, you have to pick which
14 party's primary you want to vote in, correct?
15 A. Right.
16 Q. Which party do you usually vote for in
17 primaries?
18 A. Democrat. I've always been a Democrat.
19 Q. Have you ever voted for a Republican
20 candidate or a member that was not of the Democratic
21 Party?
22 A. Yes. In some judicial elections and for
23 sheriff.
24 Q. And would that be in primary or general or
25 both?

1 A. General.
2 Q. And are you registered as a Democrat?
3 A. Yes.
4 Q. And I believe you said you've been
5 registered with the Democratic Party as long as
6 you've been registered?
7 A. Yes.
8 Q. So how have you been involved with the
9 Democratic Party over the years?
10 A. When I was in college, I worked as a -- I
11 interned as a legislative assistant for my
12 congressman.
13 Q. What congressman was that?
14 A. Charlie Rose. Not the famous one.
15 Q. A long-time congressman from North Carolina
16 down east, yes.
17 A. And I campaigned for Bill Clinton and for
18 Jim Hunt. And then more recently I became involved
19 in the local party.
20 Q. Okay. What states did you campaign for,
21 for Bill Clinton?
22 A. New Hampshire and North Carolina.
23 Q. And what kind of work did you do when you
24 were volunteering with his campaign?
25 A. Knocking on doors.

1 Q. What about with Jim Hunt?
2 A. Just distributing slate cards, palm cards,
3 information.
4 Q. Okay. So you said that you've more
5 recently been involved with the local Democratic
6 Party?
7 A. Yes.
8 Q. Can you elaborate on some of your
9 activities there?
10 A. I started as a precinct officer and helped
11 to organize my precinct, served as vice chair of it.
12 Q. I'm sorry, you said vice chair of "it."
13 The precinct?
14 A. Of the precinct, yes.
15 Q. Okay. Just making sure.
16 A. And I was approached to run for the chair
17 position, after the previous chair resigned.
18 Q. Okay. So when were you a precinct officer
19 and the vice chair of your precinct?
20 A. That would have been February of 2017, and
21 then I continued as vice chair of that precinct for
22 some time after I became a county officer, board
23 member.
24 Q. So your involvement with the local party is
25 fairly recent?

A. Yes.

Q. So you took a lapse in time between Jim Hunt and the local party?

A. Yes.

Q. So now as Guilford County Democratic Party chair, was that a position that you had to be elected to?

A. Yes.

Q. Did you run unopposed or did you have opponents?

A. I had an opponent.

Q. Who was that opponent?

A. Joe Austin, for my first term. I was recently reelected and ran unopposed.

Q. You're reading my mind.

Are there terms? Is it a year term?

A. Two years.

Q. Two-year terms, okay.

And you ran unopposed, you said?

A. This most recent time.

Q. When are the elections for the party chair?

A. March, in odd years.

Q. Okay. So what do you do as chair of the Guilford County Democratic Party?

A. We have a 16-member board. So we have

1 board meetings to discuss local party issues, we
2 recruit candidates, we recruit volunteers for
3 canvassing, for phone banking, for working at the
4 polls, we fundraise.
5 Q. So how do you fundraise?
6 A. We have a couple of major fundraisers. We
7 have a big dinner event each year that pays most of
8 our costs, and we have a fundraising letter we send
9 out annually. And those are our primary means.
10 Q. And I know this is going to be a little bit
11 difficult for you to answer since you just went on
12 the board in 2017, but do you think that you saw an
13 uptick in fundraising over the last year or so?
14 A. We did, in 2017, I believe, in fundraising
15 and in volunteerism.
16 Q. And so that was an uptick from previous
17 years, that you can tell?
18 A. So I'm told.
19 Q. Okay. And in 2018, did you see an uptick
20 from 2017, or did it stay about the same from 2017?
21 A. I believe it actually went down a little.
22 Q. And so I believe that you mentioned that
23 you get volunteers to canvass; is that correct?
24 A. Yes.
25 Q. Is that for specific candidates or for

party messaging in general?

A. That is for candidates.

Q. Okay. So how do you pick which specific candidates will get canvassing help?

A. We have a standing policy that we do not begin support of a candidate until after the primaries, so as not to cause division within the party. So after the primary, we will support the Democrat who has won the primary.

Q. That's a smart policy.

Which specific races, though? Would you canvass for House candidates? Senate candidates? School board?

A. All of them. Generally, when we canvass, we will have a slate card that we canvass with. Specific candidates will come into our offices and ask for volunteers for their specific campaign, but the party, in general, is supporting a slate.

Q. So how do you decide or recruit who canvasses or how to recruit those canvassers?

A. We send out requests in our blasts and contact our precinct officers.

Q. And when -- have you ever gone out on a canvass?

A. Yes.

1 Q. And how do you, as the county party, decide
2 where the canvassers should go?
3 A. We generally get lists of registered
4 Democrats in the districts, and we will try to hit
5 the registered Democrats who are most likely to vote.
6 Q. Where do you get this list from?
7 A. In the past, we've had a party database
8 that we -- the state party provides. They purchase
9 from someone.
10 Q. Do you know who that's purchased from?
11 A. I do not know the name of the company. The
12 database is called VoteBuilder.
13 Q. And you said that you try to knock on the
14 doors of the people who are most likely to vote; is
15 that correct?
16 A. Yes.
17 Q. How do you know who is most likely to vote?
18 A. The database pulls up that information
19 based upon previous voting history.
20 Q. So the data that you get and the list that
21 you get from the state party includes data on voters
22 in Guilford County or the specific districts?
23 A. Our access is specifically for Democrats
24 and unaffiliated. We don't have access to the other
25 parties.

1 Q. And this -- we'll get to unaffiliated
2 voters in a second. But for the Democrats, how --
3 what, in terms of the data, tells you how likely a
4 Democrat is to turn out?
5 A. The database will give a percentage
6 ranking. So depending upon how many doors we want to
7 knock in an area, we can ask it to give us a ranking
8 of voters who vote 95 percent of the elections, or,
9 you know, 85 percent of the elections.
10 Q. Okay. Does it percent -- for percentages,
11 does it rank the voters in any other way, other than
12 their likelihood to vote?
13 A. I believe there is a way to find out if
14 they've volunteered for the party or campaigns
15 previously.
16 Q. Is there a score or a metric that discusses
17 whether these individual voters are persuadable?
18 A. There may be. I have been struggling to
19 get some training in our county for this, and we have
20 not received that from the state. So I'm not as
21 familiar with it as I'd like to be.
22 Q. Sounds like it's a lot of data.
23 So have you ever accessed this data
24 yourself?
25 A. Yes, I've tried.

1 Q. Have you been successful? I know you said
2 you were having some issues.
3 A. I can manage to go in, and recently a
4 precinct chair asked me for a list of Democrats in
5 her precinct that she could contact for a
6 get-together. So I can go in and run a list of
7 Democrats in a precinct.
8 Q. Okay. And when you say "run a list," that
9 means that somehow the software database will export
10 a list, in some format?
11 A. We're not allowed to export. I think
12 they've had some security breaches. So they really
13 limit that.
14 But it will let me run the list and, you
15 know, if it's a short enough list, we can write down
16 phone numbers, make phone calls from the screen,
17 whatever.
18 Q. You can either print the screen or maybe
19 screen shot the screen, in theory?
20 A. In theory, yes.
21 Q. If it was a longer list.
22 So it sounds like you've gone in the
23 database, personally.
24 Do you have log-in information?
25 A. I do.

1 Q. And let's discuss -- so I guess the data is
2 separated. You have access to data on Democrats, and
3 you have access to data on unaffiliated voters?
4 A. Yes.
5 Q. Is the type of data different for Democrats
6 versus unaffiliated voters?
7 A. No, not that I'm aware.
8 Q. So for unaffiliated voters, you can still
9 see how many elections they've previously voted in?
10 A. Yes. I believe so.
11 Q. Can you see the candidates that they voted
12 for?
13 A. No. You can't see that for any of the
14 people in the database.
15 Q. Does it contain -- so it contains ranking,
16 again, like the Democrats, of how likely they are to
17 vote in the elections?
18 A. Yes.
19 Q. And then it maybe contains information
20 about whether they could be persuaded to vote for a
21 Democrat or not?
22 A. I'm not aware of that.
23 Q. So what is this database or this list? Do
24 you know what it's called?
25 A. It's called VoteBuilder.

1 Q. But the scores that are given to various
2 voters, are those called support scores?
3 MS. D'AMICO: Objection. Leading question.
4 BY MS. RIGGINS:
5 Q. Are the scores titled?
6 A. If they are, I don't remember.
7 Q. Is it possible that they're called support
8 scores?
9 MS. D'AMICO: Objection. Speculation.
10 BY MS. RIGGINS:
11 Q. You've seen the database?
12 A. Yes.
13 Q. And presumably there's a column with some
14 kind of header above it, above the percentage?
15 A. I'm trying to think through how the
16 searches are run. There is a -- there is a section
17 that I believe is called activism, something of that
18 nature. So you can select if -- if the voters or
19 registered voters are active in the county party at a
20 specific level. You can select if they've been
21 volunteers. You can select if they have responded
22 favorably to phone banking, phone calls.
23 But I think that one is called activism
24 score or active.
25 Q. Fair enough.

1 And so you said that you use this data as
2 part of the canvassing process.
3 Do you use the data for anything else?
4 A. Well, as I mentioned, I had a precinct
5 chair who wanted to contact Democrats in her precinct
6 to get them together. When we are trying to organize
7 precincts, in February, we will run lists of the Dems
8 in each precinct to give to the precinct chairs to
9 organize.
10 Q. So when the individual contacted you
11 because she wanted a list of Democrats in her
12 precinct to get together, was that about a potential
13 campaign or fundraising or something along those
14 lines?
15 A. It was an attempt to engage more Democrats
16 in her precinct so that when we get closer to the
17 time that we might need people to canvass or phone
18 bank, we would have a working list, she would have a
19 working list.
20 Q. Good idea.
21 So this can also be used as a way to
22 facilitate voter engagement?
23 A. Yes.
24 Q. Now, it also seems like since you have this
25 data on voters -- let me back up.

1 Is the data that you have done by precinct
2 level?
3 A. It can be selected by precinct or by any of
4 our districts, from city council, up to the state,
5 but we are limited to only our county.
6 Q. In what you can see and access?
7 A. Yes.
8 Q. Okay. So have you ever used the data to
9 look at a number of registered Democrats or
10 unaffiliated voters in a specific precinct or
11 district to help recruit a candidate?
12 A. I have not used our VoteBuilder database.
13 I have been to our County Board of Elections website.
14 They have that data.
15 Q. Okay. But if a candidate wanted to know
16 how many Democrats or wanted to target precincts
17 within their district with the strongest Democrat
18 voter turnout, you could use the VoteBuilder database
19 to get them that information?
20 A. I don't believe so. I mean, it may. But
21 as far as I'm aware, it will show you how many
22 registered Democrats are in the database or how many
23 registered unaffiliated. You can get a total number
24 on that.
25 But I don't believe it will show you, like,

1 the total number of voters in the precinct. So you
2 wouldn't be aware of how that related to Republicans
3 or other parties, which is why I go to the County
4 Board of Elections.
5 Q. Okay. But if a candidate wanted to get a
6 list of active Democrats in their precinct to help
7 fund a campaign or help volunteer with the campaign
8 or to make sure they reached out to the most active
9 Democrats, they could use the database to do that?
10 A. They could, but they'd have to buy it from
11 the state party. We couldn't give it to them.
12 Q. But you, as the county party, can use the
13 county data to target precincts on their behalf?
14 A. Yes.
15 Q. So I'm going to give you another exhibit.
16 A. Unfortunately, you may have exceeded my
17 knowledge.
18 Q. Oh, no, you sound very knowledgeable. The
19 database sounds really cool.
20 A. It's not. The information is often
21 inaccurate.
22 (EXHIBIT NO. 5 MARKED FOR IDENTIFICATION.)
23 BY MS. RIGGINS:
24 Q. So this looks like a post that you made on
25 your Guilford County Democratic Party Facebook chair

page in July of 2017. It's long, so I'm going to give you a minute to read it. Just let me know when you're done.

A. Okay.

Q. So the last paragraph in the post talks about new investments from the DNC, correct?

A. Yes, it does.

Q. And "DNC" stands for what?

A. Democratic National Committee.

Q. And it talks about a new commitment from the DNC to build up data and infrastructure for state parties to have access to; is that correct?

A. It does.

Q. And it specifically talks about an app called Knock 10.

Have you seen or used this app?

A. Never.

Q. Do you know if VoteBuilder or another database from the state party that you have access to is funded or given to the state party by the DNC?

A. The state party pays an outside company. I don't know who the company is. But this has been a matter of contention, if you will, because the state party pays the -- an outside company for the database access and then charges the counties a certain amount

1 of money, which we don't have, for access to it.
2 And just this week they have let us know
3 that they were going to cut ours off because we
4 haven't paid our quarterly dues to pay for this for
5 VoteBuilder.
6 I've never used this smart phone app. Like
7 I said, we haven't gotten the training that we need
8 and I've never -- I don't recall seeing this Knock 10
9 app; although, I have heard of apps on smart phones
10 or iPads that some campaigns have used to -- when
11 they canvass, to enter information directly, but we
12 don't use it.
13 Q. So you're not aware of any database that
14 the state party has access to or that you have access
15 to that comes from the DNC?
16 A. I am not.
17 Q. Okay. It sounds like there's a little bit
18 of contention, as there always is with smaller
19 government and larger government entities, between
20 the data and the training that you're getting; is
21 that correct?
22 A. It's, you know, just a struggle for limited
23 resources, I think. But yeah, they haven't -- they
24 haven't had time to send anyone to train us. There
25 are 100 counties in North Carolina, so we haven't had

1 any on-site training. They have limited staff.
2 Q. Do you think that your party would be more
3 effective with some training from North Carolina?
4 A. Yes.
5 Q. So you mentioned a little bit ago, before
6 we got off on our data tangent, about recruiting
7 candidates.
8 So how do you go about recruiting
9 candidates?
10 A. It sounds a lot more systematic and
11 professional than it actually is. I generally, for
12 now -- now, for instance, we have High Point
13 municipal races this year. Those are the only races
14 we have for 2019, and we like to try to run a
15 Democrat for every seat.
16 It's a ten-person council. We only have
17 three Democrats on that council, currently. And we
18 have some seats that no candidates have indicated
19 they're going to run for as Dems.
20 So we generally reach out to the precinct
21 officers in those wards or districts first and ask
22 them if they know someone interested. Then, you
23 know, I may go back to the County Board of Elections
24 website and look at the demographics and try to
25 determine, you know, who's in that area, who could

1 run in that area and have a chance of any success.
2 Q. Okay. When you say, "demographics of that
3 area," what do you mean?
4 A. The number of Republicans, Democrats,
5 unaffiliated, other parties, so the age range, so
6 that we know if they're more conservative, if they're
7 going to lean more conservative, if they're going to
8 lean more liberal.
9 Q. And I know it can be very difficult to
10 recruit candidates for municipal elections, but for
11 the 2018 elections, did you think that it was -- did
12 you have a difficult time recruiting candidates?
13 A. In the 2018 elections, the state party made
14 concerted efforts to recruit candidates at the state
15 level, so I wasn't really involved in that, and my
16 focus was more on the local races, school board and,
17 you know, county races.
18 Q. And so would you say that when the state
19 Democratic party makes a concerted effort to help
20 recruit candidates at the state level, it frees up
21 your attention to help focus more on the local
22 elections?
23 A. Sure.
24 Q. And when you -- when the state party is
25 involved, do you think it makes it easier to recruit

1 candidates?
2 A. Yes.
3 Q. And are you aware -- I know you said that
4 the Democratic Party in North Carolina made a
5 concerted effort to recruit state-wide candidates in
6 2018.
7 Are you aware if they had done that
8 previously for other election cycles?
9 A. I am not aware. I know that, in 2018, I
10 believe it was at the direction of the governor.
11 They had a specific program that they determined no
12 state-level seat would go unchallenged, no state
13 legislative seat.
14 Q. Do you know what that program was called?
15 A. Break the Majority.
16 Q. And do you think the state party was able
17 to do this and create more of a focus on state-wide
18 elections in part because of an investment from the
19 DNC that's alluded to in the post in this exhibit?
20 MS. D'AMICO: Objection. Leading question.
21 BY MS. RIGGINS:
22 Q. You've read the Facebook post?
23 A. Yes.
24 Q. And does the Facebook post discuss DNC
25 investment in state parties at an unprecedented

level?

A. It does.

Q. And in your opinion, do you think more investment makes it easier to recruit candidates?

A. I suppose so.

Q. Do you think more investment makes it easier for those candidates to be successful?

A. Theoretically.

Q. And let's look at paragraph five, the paragraph that begins with "Our state party."

Do you see that paragraph?

A. Yes.

Q. The second sentence says, "But in recent years, we have not tapped into their full potential and have suffered losses both nationally and in our state."

And is it your understanding that when he says, "their full potential," he's referring to local and state party races?

A. Yes.

Q. And so do you think that, in 2018, the DNC, in the state of North Carolina, made a concerted effort to increase their contributions and their involvement in the elections?

A. I cannot speak to the DNC, how much they

1 actually contributed, but the state party did, I
2 believe.
3 Q. Okay. And so, in your opinion, this
4 concerted effort that the article indicates had not
5 been done previously in the past few years, it made
6 it easier to recruit candidates?
7 A. I don't know that it made it easier. I
8 would say that I believe this was the first time,
9 ever, that no Republican went unchallenged at the
10 state level.
11 Q. So it may not have been easier, but it was
12 more successful?
13 A. Yes.
14 Q. And so do you feel that, as a result of
15 this more successful effort to recruit candidates,
16 that the 2018 election was a successful election for
17 Democrats in Guilford County and in North Carolina?
18 A. In the sense that I believe they achieved
19 their objective, to some sense. They broke the
20 supermajority.
21 Q. So you would agree that Democrats picked up
22 a significant number of seats in the General
23 Assembly?
24 MS. D'AMICO: Objection. Vague as to what
25 the "substantial" means.

1 BY MS. RIGGINS:
2 Q. So you would agree that, before 2018,
3 Republicans had a supermajority in the General
4 Assembly?
5 A. Yes.
6 Q. And you would agree that, after the 2018
7 election, Democrats won enough seats to break that
8 supermajority?
9 A. Yes. The Republicans still have a
10 majority, but not a supermajority.
11 Q. Do you know what the significance of not
12 having a supermajority is?
13 A. Yes. It means that the governor can veto
14 legislation. And conceivably, it will not be
15 overrode by a two-thirds majority of the legislature.
16 Q. So based on the 2018 election results,
17 Democrats picked up enough seats in the General
18 Assembly to have a larger voice in the way the
19 General Assembly is run?
20 A. Yes.
21 Q. And would you agree that that's a good
22 thing?
23 A. In my opinion.
24 Q. So when you're recruiting candidates, I
25 know you discussed a little bit that you looked at

1 the demographics of the districts.
2 Do you want to recruit candidates for
3 competitive reasons?
4 A. We do try to recruit candidates for
5 competitive races, but sometimes you look at a
6 district and it's not winnable, and we have a couple
7 of those in our county.
8 Q. Do you think it's easier to recruit
9 candidates in safe districts?
10 A. Obviously. A candidate does not want to
11 spend the time and the money required to run a race
12 if it's unwinnable.
13 Q. Well, not necessarily unwinnable, but what
14 about a competitive race? If it was a coin flip, if
15 it was 50/50 or the breakdown in the district was 53
16 percent Democrat and 47 percent Republican, do you
17 think it's easier to recruit in that district versus
18 a district with the significant majority of
19 Republicans?
20 A. Probably.
21 Q. Do you think it's easier to recruit in a
22 district with 60 percent Democrats or more than the
23 competitive district?
24 A. Probably. Yes.
25 Q. So do you think candidates have to spend

1 more money in competitive races?
2 A. Sure.
3 Q. Do you think that competitive races are a
4 good thing?
5 A. Yes.
6 Q. How would you define a competitive race?
7 A. Competitive race is a race in which
8 everyone has a chance. Every vote makes a
9 difference.
10 Q. So for every vote to make a difference and
11 where everyone has a chance, what kind of percentage
12 would that look like to you? Is it strict 50/50?
13 A. Within a certain degree of -- I've
14 forgotten my statistical terms, but, yeah, error,
15 yeah.
16 Q. Within maybe -- to use a political term,
17 within a certain number of point spread?
18 A. Yes.
19 Q. What would you consider a competitive race
20 based on the point spread?
21 A. Four points.
22 Q. Four points is a competitive race. Okay.
23 THE WITNESS: May I take a break?
24 MS. RIGGINS: Sure. I was getting ready to
25 ask that.

(RECESS TAKEN.)

BY MS. RIGGINS:

Q. So other than your involvement as chair of the county Democratic Party, which I understand I'm sure takes up a large chunk of your volunteer time, are you involved with any other Democratic groups?

A. I am a member of Democratic Women.

Q. Okay.

A. And just a week ago, I believe it was, I joined LGBTQ Dems --

Q. Okay.

A. -- as an ally.

Q. So for Democratic Women of Guilford County, what is the purpose of this group?

A. Well, that's up for debate. Traditionally, it's been more of a social group.

Q. All right.

A. Our general understood purpose of any of our auxiliary groups, as we call them, is to provide a voice for that group within the party, to give voice to their issues. So women's issues would be important to them.

Q. Okay. Do you have a leadership role in that group?

A. No.

1 Q. And in terms of giving a voice to the
2 women's issues, how are they going about giving that
3 voice? Is it to specific candidates or awareness
4 events or things like that?
5 A. How much do you know about precinct
6 organization?
7 Q. I can't pretend to be an expert. Let's put
8 it this way: I know enough to be dangerous.
9 A. One of the things we do at the precinct
10 level is we write resolutions.
11 Q. Okay.
12 A. And these are statements on issues that are
13 important to us. And those resolutions then go on to
14 our county convention to be voted upon.
15 Q. Okay.
16 A. To determine if they're important to the
17 entire county. And from there, they go on to the
18 districts and on up to the state, and from the state
19 on up to the DNC. And basically, that's where the
20 party platform comes from.
21 So the auxiliary groups have the
22 opportunity to write those resolutions as well, to
23 become involved in their precincts and voice women's
24 issues or things that are important to them, so that
25 hopefully it becomes a part of the party platform.

1 Q. Do you have any of those platform drafts of
2 specific ideas, either from Democratic Women or as
3 part of your Democratic Party chair duties?
4 A. I'm sorry, I didn't quite understand that.
5 Q. Let me rephrase.
6 So you mentioned writing these pieces that
7 people will give to the precinct level, and then if
8 the precinct votes, it goes on to the county and then
9 from the county to the state.
10 A. Are you asking if I've written resolutions?
11 Q. Sure. We'll start with that.
12 Have you written any resolutions?
13 A. I did as a precinct chair and I have as a
14 chair, yes.
15 Q. Okay. So what kind of resolutions did you
16 write?
17 A. The last resolution I wrote, I believe, was
18 asking North Carolina legislators to ratify the Equal
19 Rights Amendment.
20 Q. And have you written any resolutions about
21 redistricting or gerrymandering?
22 A. No.
23 Q. Have you seen any come across either your
24 precinct or the county?
25 A. Yes. I mean, it's -- I think it's a topic

1 that comes up.
2 Q. Okay. And do you still have access to
3 these resolutions and platforms?
4 A. The platform of the state party is on their
5 website. And I believe, before our county convention
6 resolutions have been submitted, are posted on our
7 website, and we may post a link on social media.
8 Q. But you don't still have any of the
9 resolutions in your possession?
10 A. No. I keep them in our -- our executive
11 director keeps them in a big binder in her desk or
12 office.
13 Q. And you said a few minutes ago that you
14 joined the LGBTQ Democratic group?
15 A. Yes.
16 Q. Is that Guilford County?
17 A. Yes.
18 Q. And you said you joined as an ally?
19 A. Yes. I'm not a part of that community, but
20 I was trying to help them get reorganized, so I paid
21 a $5 membership fee and helped them organize their
22 meeting.
23 Q. Okay. And so you helped them organize
24 their first meeting?
25 A. Uh-huh.

Q. And was that recently? You said about a week ago?

A. Yeah.

Q. Any other Democratic organizations?

A. That I'm a part of?

Q. Yes.

A. We have six auxiliary groups in our county, but those are the only two that I'm actually a member of. I'm responsible for helping them facilitate and grow.

Q. Fair enough. Yeah.

Were you involved with any other organizations before you reentered the local politic scene in 2016, 2017?

A. Yes.

Q. What were those?

A. I am an admin for -- not an active one any longer, but an admin for a group called Rise Together Piedmont Triad, and that was formally Pantsuit Nation.

Q. Okay.

A. And I am a member of Indivisible.

Q. And so for Rise Together -- you said Piedmont Triad?

A. Uh-huh.

1 Q. You said you were an admin.
2 What does that mean?
3 A. That means that I approved posts --
4 Q. Okay.
5 A. -- from group members.
6 Q. So it was like an actual civic organization
7 or like a Facebook group?
8 A. It's mainly Facebook-oriented. When they
9 first organized, they would have action-oriented
10 events such as protests, postcard-writing events,
11 things like that.
12 Q. Were you active in those activities?
13 A. Yes.
14 Q. And do they still do those types of things?
15 I'm guessing more during the election season, like
16 postcard writing or things like that?
17 A. Some. Not as much. And as I said, I'm not
18 terribly active in it anymore because I am occupied
19 with other things.
20 Q. And I believe you said you're a member of
21 Indivisible?
22 A. Yes.
23 Q. And what do they do?
24 A. They do similar things. They do protests.
25 They do postcard writing, lobbying. They do

canvassing, Get Out the Vote events, things like that, voter registration.

Q. Do you hold a leadership position with that group?

A. No.

Q. Have you previously?

A. I think at one time they tried to make me a district admin, but they found someone else because I wasn't very active.

Q. You've got a lot going on. Yeah.

Do you know if they fundraise to facilitate their activities?

A. Indivisible doesn't, no. They don't have any fundraising or money or anything of that sort.

Q. So it's more of a coalition of like-minded people to get together and do events, but the members are on their own time?

A. Yeah.

Q. And would you say that any events that Rise Together Piedmont Triad did would be similar?

A. Right.

Q. That makes perfect sense.

Any other types of, you know -- pardon the colloquialism -- liberal or progressive organizations or coalitions?

1 A. I am sure I am. I mean, we are a -- the
2 county party is a member and ally of the ERA North
3 Carolina Alliance, and I support them. I have been a
4 member of ACLU, Southern Coalition for Social
5 Justice.
6 Q. You said the ERA North Carolina Alliance,
7 and just to clarify for the record, is that the Equal
8 Rights Amendment?
9 A. Yes.
10 Q. And I know you said previously that you had
11 campaigned for Bill Clinton and Jim Hunt, correct?
12 A. Yes.
13 Q. Have you ever volunteered or campaigned for
14 a state House or a state Senate candidate?
15 A. During this last election, I signed up with
16 my son for a weekend canvass for Senator Michael
17 Garrett.
18 Q. And by "last campaign cycle," you mean
19 2018, correct?
20 A. Yes.
21 Q. And you've never been prohibited from
22 volunteering for any campaign?
23 A. No, I don't believe so.
24 Q. Have you ever solicited for any political
25 contributions to any federal or local candidates?

A. I have reposted candidate fundraising events, things of that nature.

Q. Have you ever been to candidate fundraising events?

A. Yes.

Q. Numerous, I assume?

A. Yes.

Q. Were any of those for state House or state Senate races?

A. Many.

Q. So you would say that making political contributions or attending political fundraisers is something you routinely do?

A. Attending, yes.

Q. And would you say that that's been since 2016, on?

A. Yes.

Q. And have you made any political contributions to any federal candidates?

A. Federal?

Q. Yes.

A. I don't believe so.

Q. What about state candidates?

A. Yes.

Q. Which candidates?

1 A. Steven Buccini, Ashton Clemmons, Gladys
2 Robinson. I don't remember if there are any others.
3 A Georgia state candidate, I believe.
4 Q. Okay. And I know Ms. Clemmons is a
5 representative in Guilford County.
6 A. Yes.
7 Q. What position was Mr. Buccini running for?
8 A. He was running for state House.
9 Q. Okay. And do you remember the dates or the
10 amounts that you've donated?
11 A. I'm trying.
12 Q. It's not a memory test. Just if you know.
13 A. I know for Steven Buccini, I -- for his
14 campaign, I believe I actually hosted an event in my
15 neighborhood. So that would have been like a
16 clubhouse rental fee amount.
17 Q. Do you recall when that event was?
18 A. Last fall.
19 Q. So fall 2018?
20 A. I believe so.
21 Q. And did people -- did you send out
22 invitations and people RSVP to you electronically, or
23 is that something his campaign did?
24 A. That's something the campaign did.
25 Q. What about donations to Ms. Robinson or

1 Ms. Clemmons?
2 A. That was to attend an event. I think it
3 was a baseline donation. But I don't remember the
4 amount.
5 Q. Okay. And the Georgia state candidate, was
6 that just, like, an online-type donation?
7 A. It was a daughter of a friend.
8 Q. And were most of these campaign
9 contributions since 2016?
10 A. Yes.
11 Q. So I believe you said earlier that, in
12 preparation for your deposition today, you reviewed
13 the complaint --
14 A. Yes.
15 Q. -- is that correct?
16 And the amended complaint, I'm guessing,
17 most current version?
18 A. (Witness nods head in agreement.)
19 Q. Did you review the original complaint
20 before it was filed?
21 A. I did read over the original complaint,
22 yes.
23 Q. Did you make any changes to it?
24 A. No.
25 Q. So what is your understanding of the claims

1 that you're pursuing in this case?
2 A. I believe that the district I'm living in
3 is unfairly gerrymandered. That a Democrat could not
4 win in that district.
5 Q. So do you believe that you're
6 challenging -- you specifically, you're challenging
7 your specific district or the plan as a whole?
8 A. The plan as a whole, but I'm able to relate
9 more to my experience in my specific district.
10 Q. Okay. And how do you believe your district
11 has been gerrymandered? Do you believe it's a
12 political gerrymandering or a racial gerrymandering?
13 A. I believe it was a political
14 gerrymandering. I believe when this legislature was
15 forced to redraw maps, at the end of 2017, that they
16 intentionally made this district a safe Republican
17 district.
18 Q. Okay. And so what relief are you seeking
19 from this lawsuit?
20 A. I just want fair districts. I'm not asking
21 for, you know, a district that is guaranteed to be
22 Democratic. But I want it to be fair. I think my
23 vote should matter, and I just want fair districts.
24 Q. So what does a fair district look like to
25 you?

1 A. That means that, you know, every person's
2 vote counts and there is the possibility for either
3 side to win.
4 Q. So I heard you use some of the same
5 language that you were talking about when you were
6 talking about competitive districts earlier.
7 In your mind, is a fair district a
8 competitive district?
9 A. Yes.
10 Q. In your mind, a fair district would have
11 one of the four-point swings?
12 A. Yes.
13 Q. So the relief that you're seeking, you
14 would want each district in North Carolina to be
15 competitive, under your definition?
16 MS. D'AMICO: Objection. Leading question.
17 MS. RIGGINS: Okay. I understand your
18 objection. But under the North Carolina rules
19 of evidence, she is an adverse party and I'm
20 allowed to ask leading questions.
21 MS. D'AMICO: I'm just preserving my
22 objection for the record. She can answer.
23 THE WITNESS: Would you repeat the
24 question?
25 MS. RIGGINS: Could you read the question

1 back, please?
2 (Court reporter read back the question:
3 "So the relief that you're seeking, you would
4 want each district in North Carolina to be
5 competitive, under your definition?")
6 THE WITNESS: I would want them to be drawn
7 fairly, without an intent at partisanship.
8 BY MS. RIGGINS:
9 Q. So I'm going to interpret your answer and
10 tell you what I think you said, and you can tell me
11 if I'm totally wrong.
12 So you maybe understand that it would --
13 just based on the state's geography, that it could be
14 difficult to draw every district within that
15 four-point swing?
16 A. Yeah.
17 Q. You want a four-point swing, if it's
18 possible?
19 A. Yes. That's fair to say, yes.
20 Q. So you would still want any future
21 districts to adhere to some traditional redistricting
22 criteria?
23 MS. D'AMICO: Objection. You're
24 mischaracterizing her testimony. She's not
25 talked about any criteria.

1 MS. RIGGINS: You're making a lot of
2 speaking objections, which is not allowed for
3 under the rules. I understand you're just
4 preserving the objections.
5 BY MS. RIGGINS:
6 Q. So you understand that traditionally when
7 you redistrict, people aren't looking generally at a
8 specific goal for a swing or for the election
9 results, correct?
10 A. That's the way it should be, ideally.
11 Q. Do you think when people ideally
12 redistrict, that legislatures or courts or whomever
13 should adhere as much as they can to precinct
14 boundaries and try to keep those precincts whole?
15 A. Yes.
16 Q. What about county or municipal lines? Do
17 you think it's important to keep those whole?
18 A. If possible.
19 Q. Why do you think it's important to try to
20 keep precincts whole?
21 A. Because it gets confusing, if your precinct
22 is split, to know who your candidates are. You'd go
23 to vote and you may think that you are supposed to
24 vote for this election and somehow you're in a
25 different district than your neighbor in the

1 precinct. It's just confusing, I think.
2 Q. Is it kind of similar with the
3 municipalities, to the extent they're small enough to
4 be kept whole?
5 A. Yeah.
6 Q. So I'm going to give you a copy of the
7 amended complaint that I believe that you've
8 reviewed. I'm sorry, it's long.
9 A. Oh, my Lord.
10 (EXHIBIT NO. 6 MARKED FOR IDENTIFICATION.)
11 BY MS. RIGGINS:
12 Q. This is a single-sided copy.
13 So let's turn to page -- I believe it's 15
14 of the complaint.
15 So do you see paragraph 44 close to the top
16 of this page?
17 A. Yes.
18 Q. I'll give you minute to read that.
19 A. Yes.
20 Q. And this is the paragraph that discusses
21 you and your district in the complaint?
22 A. Yes.
23 Q. The third sentence in paragraph 44 that
24 starts with "The General Assembly," could you please
25 read that sentence out loud?

1 A. "The General Assembly packed House
2 districts 58 and 60 to ensure that Republicans win
3 House district 59."
4 Q. Could you also read the fourth sentence?
5 A. "In 2018, the Republican candidate won
6 House district 59 with over 56 percent of the vote."
7 Q. So in this paragraph, you're claiming that
8 the General Assembly, quote, "packed House districts
9 58 and 60;" is that correct?
10 A. Yes.
11 Q. And that as a result of that, quote,
12 "packing," that it has made it possible for a
13 Republican candidate to win in district 59?
14 A. Yes.
15 Q. So what do you mean when you say it's
16 packed?
17 A. What they did was basically -- if you look
18 at the districts on our county map, district 59 is
19 the eastern side of Guilford County. That eastern
20 side in the city is the traditionally African
21 American lower income areas of Greensboro.
22 So what they did was they packed as much of
23 that African American community into the other
24 districts as they could, leaving just a couple of
25 precincts that were predominantly African American in

1 this district 59, with the rest of 59 being -- having
2 precincts that were up to 78 percent Republican.
3 Q. Okay. And so when this packing occurred,
4 do you think it was political considerations that
5 were considered or racial considerations?
6 A. Political. I mean, there's no denying that
7 the Democratic Party is more diverse than the
8 Republican Party, but I think it was political
9 consideration.
10 Q. Okay. And so you've talked about how you
11 think these districts are specifically packed with
12 African American voters in the specific precincts.
13 Is there a number in mind? Like we talked
14 about the points for competitive races, is there a
15 number in which you think the district is packed?
16 Is it anything that's not competitive, in
17 your mind?
18 A. I think, if you look at those districts and
19 the percentage of Democrats and African American
20 Democrats in them, it's a fairly large majority.
21 For instance, I mentioned that in 59 some
22 of the precincts have 78 percent Republicans and are
23 predominantly white. So that seems well beyond the
24 majority to me.
25 Q. Okay. So much like we talked about, you

1 know, points for competitiveness, at what percentage
2 of Democrat voters do you think a district is packed?
3 We said a district is competitive at 48/52.
4 Is it packed at 55 percent, in your mind?
5 A. I don't know where I would set a cut-off.
6 But I do think, when you get above 60, 70 percent,
7 that's suspicious.
8 Q. Well, I guess, yeah, because getting above
9 60 percent would be a 20-point swing?
10 A. Yeah.
11 Q. A pretty large swing, wouldn't you agree?
12 A. Yeah.
13 Q. So 60 percent-ish is about where you're
14 looking at for a packed district? You think it
15 becomes suspicious, but it's packed around 60
16 percent?
17 A. I think it's definitely something that
18 someone should look at.
19 Q. When you say, "someone should look at," who
20 do you mean?
21 A. The Board of Elections, perhaps.
22 Q. Okay.
23 A. My understanding is that the Board of
24 Elections looks for suspicious statistics when they
25 audit elections, and those sort of numbers just seem

1 out of line to me.
2 It seems like the people who drew the lines
3 probably knew that and recognized that when they were
4 drawing the lines and had to have some awareness of
5 it.
6 Q. Okay. So in paragraph 44, where you said
7 that House districts 58 and 60 are packed, how
8 specifically do you think that impacts your district?
9 Do you think that makes your district cracked?
10 A. My district is unwinnable by a Democrat.
11 I went from being in a district represented
12 by a Democrat, Amos Quick. I could call him up. I
13 could express my concerns or opinions on issues and
14 he would respond. I've called him up and asked him
15 to support legislation, and he has signed on as a
16 cosponsor. I felt like I was truly represented.
17 So then I get moved into this district
18 where it is predominantly red and a Democrat cannot
19 win, and I don't feel represented anymore. And I
20 don't feel like I have a shot of being represented.
21 I've called my current representative.
22 I've contacted him about issues, and he kind of just
23 blows me off. They're not a part of his party's
24 platform or agenda, and he's never been overly rude,
25 but he has done nothing related to my concerns.

1 Q. So have you ever contacted Mr. Hardister
2 about an issue and he simply hasn't responded to you?
3 A. I'm thinking. I've had responses that were
4 nonresponses, and that he acknowledged he's heard me.
5 Q. Okay. And I think you said earlier that
6 the district you're in now, 59, is overwhelmingly
7 Republican?
8 A. Yes.
9 Q. Do you think that a representative has a
10 duty to represent the issues of the majority of
11 people in his district?
12 A. Well, I think a representative has a duty,
13 to some extent, to represent all of his constituents
14 and to listen to their concerns.
15 I recognize that any representative is
16 going to be more responsive or in line with the
17 concerns of constituents of his own party, but at the
18 same time, I think he should listen to the concerns
19 of all of his constituents and be able to provide
20 answers or solutions.
21 Q. And do you feel that Mr. Hardister hasn't
22 listened to the issues that you've put in front of
23 him?
24 A. I think he listens and dismisses them.
25 Q. Do you think that a representative is

1 required to act when a constituent contacts him about
2 an issue?
3 A. I think the representative is required to
4 listen, which he has done. But again, I understand
5 that a representative generally represents the
6 majority who voted him in.
7 Q. And I know that you have mentioned
8 previously that you were represented by Amos Quick in
9 the House before, correct?
10 A. Yes.
11 Q. And Mr. Quick is a Democrat, correct?
12 A. Yes.
13 Q. And I'm assuming that when Mr. Quick
14 represented you, he was your candidate of choice?
15 A. Yes.
16 Q. Do you think that you are entitled to elect
17 your candidate of choice?
18 A. I think that I'm entitled to have my vote
19 count.
20 Q. So you think you're entitled to live in a
21 competitive district, like we've discussed
22 previously?
23 A. Yes.
24 Q. And I know you said previously that you
25 don't think House district 59 is winnable for a

1 Democrat, correct?
2 A. Correct.
3 Q. Do you know how many registered Democrats
4 are in House district 59?
5 A. Not off the top of my head.
6 Q. Do you know how many registered Republicans
7 are in your district?
8 A. No.
9 Q. What about unaffiliated?
10 A. No.
11 Q. Would it surprise you to know that the
12 voter registry is fairly even between Democrats and
13 Republicans in House district 59?
14 A. Yes.
15 Q. Let's take a look at it.
16 (EXHIBIT NO. 7 MARKED FOR IDENTIFICATION.)
17 BY MS. RIGGINS:
18 Q. So I'll represent to you that I downloaded
19 this in Excel format from the North Carolina State
20 Board of Elections.
21 A. Okay.
22 Q. You see on the second line for House
23 district 59, it says, "unaffiliated voters"?
24 A. Yes.
25 Q. How many voters are those?

A. 19,056.

Q. And in the line below that, how many Democratic voters are there?

A. 21,398.

Q. And how many Republican voters are there?

A. 25,537.

Q. Do you think that's fairly even?

A. It depends upon your definition of "even."

Q. Okay. You would agree with me, though, that the number of unaffiliated voters in district 59 is pretty significant, correct?

A. Yes.

Q. Or makes up about a third-ish. My math isn't great. That's why I went to law school. But makes up about a third of the population.

A. I think it would be a better indicator if you looked at how they voted.

Q. Right.

A. Most of those unaffiliated are conservative-leaning.

Q. But in looking at these numbers, is it possible that if a majority of unaffiliated voters voted with a Democrat, for example, in a wave election or something like that, that they could beat the Republican candidate?

1 A. It is possible, but not likely.
2 Q. Okay. Do you think that unaffiliated
3 voters -- strike that.
4 Do you think that the issues matter to some
5 voters, the issues that a candidate supports?
6 A. Yes.
7 Q. Okay. And do you think that if a
8 Democratic candidate ran on a platform that was
9 slightly more conservative, they might appeal to some
10 of those unaffiliated voters that you said are likely
11 conservative?
12 A. I believe, if they ran on a conservative
13 enough platform to appeal to those voters, they would
14 not be running on a Democratic platform.
15 Q. Okay. But would you agree that there are
16 varying levels of conservatism within the Democratic
17 Party?
18 A. There are, and we had a conservative
19 candidate or conservative-leaning candidate run as a
20 challenger in that area and he still lost by a
21 significant percentage.
22 Q. So we talked a little bit earlier about
23 canvassing and the data that you get on both
24 Democratic and unaffiliated voters.
25 Would you say you spend more time targeting

1 Democratic voters than unaffiliated voters?
2 A. We did not, in this last election.
3 Q. You spent about even time?
4 A. We specifically tried to reach out to
5 unaffiliated voters more than we had in the past.
6 Q. So in looking at these numbers, do you
7 still think that it's impossible for a Democrat to
8 win in your district, even in a strong wave election
9 for Democrats or in a strong, say, anti-Republican
10 election.
11 A. I do believe so. I never like to say
12 anything is absolute. I suppose if perhaps the
13 Republican candidate was convicted of something
14 tomorrow that, you know, maybe we could win an
15 election.
16 But, you know, I live in that district.
17 I've been in the house I'm in 20 years. I have been
18 trying, as the chair of the party, to organize
19 precincts out there. We can't even get the precincts
20 organized because we can't locate enough left-leaning
21 people to even try to organize out there to make it
22 effective to canvass.
23 So I've actually had to tell candidates
24 looking at that seat that it's a waste of their time
25 and money. I mean, it's just --

1 Q. And you say, "candidates looking at that
2 seat," you mean looking at House district 59?
3 A. Potential candidates.
4 Q. So are you actively discouraging Democrats
5 from running in House district 59?
6 A. No. I'm still searching for someone who
7 will take it on, but they need to know the
8 statistics. I'm a cost-benefit analysis sort of
9 person.
10 Q. Okay. That's fair.
11 Would you say that looking at these numbers
12 surprised you?
13 A. The Democratic/Republican numbers are a
14 little closer than I expected, but I believe that is
15 because I looked at the party people voted for as
16 opposed to the party they were registered for, when I
17 was analyzing numbers.
18 Q. Do you think that people generally vote
19 across party lines?
20 A. I mean, if you're unaffiliated, you don't
21 have a party, so...
22 Q. Right.
23 A. I can't say.
24 Q. Okay. But you said earlier that you've
25 only voted for a few Republicans, and that was for

1 judicial and sheriff recently?
2 A. Yes.
3 Q. And would you consider yourself a typical
4 Democratic voter in that regard?
5 A. Yes.
6 Q. Do you think who is at the top of a ticket
7 influences voter turnout?
8 A. Yes.
9 Q. So is it possible, based on these numbers,
10 if a really bad Republican candidate was at the top
11 of the ticket, that Republicans were not excited to
12 turn out for, the Democrats could win the seat?
13 You said the numbers were closer, so do you
14 think that's possible?
15 A. I don't know. Maybe. No idea.
16 Q. Do you know often state House and state
17 Senate districts are redrawn, traditionally?
18 A. I believe it's supposed to be after a
19 census, isn't it?
20 Q. That's correct.
21 Do you know how often the census is
22 conducted?
23 A. Every ten years.
24 Q. Do you know when the current districts were
25 drawn?

A. Yes. End of 2017.

Q. And I believe you said before that the Republican Party controlled that process, correct?

A. Yes.

Q. And are you aware of why the districts were redrawn in 2017?

A. Because they were found to be racially gerrymandered.

Q. Do you know who found the districts to be racially gerrymandered?

A. The courts.

Q. And do you know if that was a federal court?

A. I do not know.

Q. Do you know if the U.S. Supreme Court found that they were?

A. I believe it was a state court. I don't know.

Q. Do you know when the districts were redrawn, before 2017?

A. I'm not positive. I want to say maybe 2015.

Q. I'm sorry, do you know when the legislative districts were redrawn before that? We do a lot of redistricting in North Carolina.

A. I don't.

Q. Okay. But would you think that it's inaccurate for me to say that if they were drawn as part of the regular process, after the census in 2011, that that sounds about right?

A. That sounds reasonable.

Q. Okay. And is it your understanding that the Republicans controlled that process as well?

A. I believe so.

Q. And do you know when legislative lines were drawn prior to that, in the early 2000s?

A. No idea.

Q. So does 2003 sound right?

A. (Witness moves head side to side.)

Q. Do you know which party was in control of the legislature prior to 2010?

A. No.

Q. You don't?

A. I'm sorry, my memory all runs together, if you go back too far.

Q. No, that's fine.

So let's put it this way: Would it surprise you to know that, in 2010, Republicans gained a majority in the House and Senate for the first time since the civil war?

1 A. No.
2 Q. Wouldn't surprise you? Okay.
3 So I'll represent to you that the
4 Democratic Party controlled the legislature for 120
5 years prior to 2010 and therefore controlled the
6 redistricting process in the early 2000s.
7 Does that sound about right?
8 A. Okay.
9 Q. So for the current district that you live
10 in and for Guilford County, do you know if those
11 districts that were enacted by the legislature are
12 the same districts that Guilford County voted in in
13 2018?
14 A. I'm sorry, say that again.
15 Q. Let me try to rephrase that.
16 Are you aware that a special master redrew
17 some of the districts that were drawn in the 2017
18 plan?
19 A. Yes.
20 Q. And specifically, are you aware that a
21 special master redrew some of the House districts
22 under the 2017 plan?
23 A. Yes.
24 Q. And are you aware that that took place
25 roughly in December, end of 2017?

A. Yes.

Q. And are you aware that some of those districts that the special master redrew were in Guilford County?

A. Yes.

Q. So I'm going to turn your attention back to the amended complaint for a second. We're going to turn to page 32, specifically paragraph 123.

I'll give you a minute to read that.

A. Okay.

Q. Beginning at the second sentence, in paragraph 123, can you read aloud the remainder of that paragraph?

A. "To cure the racially gerrymandered districts, the special master needed to adjust not only those districts, but also certain districts adjoining them and has recommended remedial plan submitted to the court on December 1, 2017.

"The special master made material adjustments to House districts 22, 59, 61 and 62, in redrawing House districts 21 and 57, and made material adjustments to Senate districts 19, 24 and 27, in redrawing Senate districts 21 and 28."

Q. And does the last sentence say that the court adopted the special master's recommendations in

1 all of those districts?
2 A. I'm sorry. Yes.
3 Q. That's fine.
4 I know that's a lot to unpack in that
5 paragraph, and I know you mentioned a county map
6 earlier. I'm a pretty visual thinker, so I'm going
7 to pull out a copy of that map to help us with the
8 rest of these questions.
9 MS. RIGGINS: We'll mark this as 8.
10 (EXHIBIT NO. 8 MARKED FOR IDENTIFICATION.)
11 BY MS. RIGGINS:
12 Q. So I'll represent to you, because I know
13 there's a bunch of numbers at the bottom of the page
14 there, that those numbers just mean that this was
15 pulled off of the docket of a federal court where the
16 special master was ordered to draw districts and then
17 did, in fact, draw these districts.
18 And you live in district 59, which is the
19 tan district on the map?
20 A. Yes.
21 Q. This is one of the districts that,
22 according to paragraph 123, the special master made
23 material adjustments to, correct?
24 A. Yes.
25 Q. And just quickly with the amended

1 complaint, I'm going to turn your attention to
2 paragraph 125, also on paragraph 32, and it says, "On
3 June 28, 2018, the U.S. Supreme Court affirmed the
4 lower court's adoption of the special master's
5 remedial plan for House districts 21 and 57 and the
6 relevant adjoining districts, and the Senate
7 districts 21 and 28, and the relevant adjoining
8 districts."
9 Does that refresh your recollection that
10 these districts were drawn pursuant to a federal
11 court case, and a U. S. Supreme Court specifically
12 sanctioned these districts?
13 A. Yes.
14 Q. So is it your understanding, based on
15 paragraph 125, that these districts were ordered into
16 use by the U.S. Supreme Court?
17 A. Yes. They were determined not to be
18 racially gerrymandered any longer.
19 Q. So the yellow and green districts on the
20 map, those are districts 58 and 60 that you've
21 alleged are packed, correct?
22 A. Yes.
23 Q. And the other districts on this Guilford
24 County map -- 61, 57 and 62 -- you have not alleged
25 that those districts are packed, correct?

1 A. Correct.
2 Q. And it's your understanding that plaintiffs
3 in this case are not challenging those districts,
4 correct?
5 A. Correct.
6 Q. And so it's your understanding that these
7 are the elections -- these are the district lines
8 that Guilford County voted under in 2018, correct?
9 A. Yes. That looks accurate.
10 Q. Okay. Do you think that the General
11 Assembly should be able to change the districts that
12 the special master drew and were ordered into effect
13 by the U.S. Supreme Court?
14 MS. D'AMICO: Objection. Calls for a legal
15 conclusion.
16 MS. RIGGINS: That does not call for a
17 legal conclusion.
18 BY MS. RIGGINS:
19 Q. You can answer the question.
20 MS. D'AMICO: You can answer the question.
21 THE WITNESS: Well, the General Assembly
22 did change the districts the special master
23 approved before they went to the Supreme Court
24 for approval.
25 BY MS. RIGGINS:

1 Q. So you think you didn't vote in 2018 under
2 the special master's districts?
3 A. What I'm getting at is, the special master
4 drew the districts. The legislature reviewed them.
5 There was some conversation among legislators at the
6 time, because some incumbents were drawn out of their
7 districts.
8 So they came down and circled a precinct to
9 make it easier to put an incumbent in their district,
10 so they weren't double-booking, as it were,
11 incumbents in the same district. So there were
12 adjustments made to it after the special master drew
13 it and before the final approval was made.
14 Q. Okay.
15 A. For instance, if you look at district 58,
16 that is Amos Quick's district. So originally, you
17 know, I'm not -- the precincts -- I can't see the
18 precincts on here.
19 But originally, the precinct where he lives
20 was not in his district, under the special master's
21 map. So they agreed to come down and add his
22 precinct into it.
23 Q. Okay.
24 A. But they did not bring it back out to where
25 it was before. Previously his district extended out

1 into this tan, you see.
2 Q. Okay. So your understanding of the process
3 is that, after the special master drew the maps, the
4 General Assembly made some requests. And those
5 requests may or may not have been accommodated,
6 depending on the request?
7 A. Yes.
8 Q. But these specific maps that were used in
9 the 2018 election were materially drawn by the
10 special master and ordered by the Supreme Court?
11 A. Yes.
12 Q. And for these specific districts, as
13 ordered by the U.S. Supreme Court in June of 2018, do
14 you think the General Assembly should be able to
15 alter these now?
16 A. I think that -- I believe that our state
17 constitution allows for that.
18 Q. You believe that the state constitution
19 allows for the General Assembly to ignore a federal
20 court order?
21 A. No. Forgive me.
22 I believe that the state constitution
23 allows for the General Assembly to draw the districts
24 based upon the census, and we have a census coming
25 up.

1 Q. So that's an excellent clarification point.
2 Thank you for pointing that out. I was probably
3 unclear there.
4 You don't think that the General Assembly
5 should be allowed to redraw the districts that the
6 court had ordered, before the census, before the
7 appointed time to redraw?
8 A. Unless the court finds that there is still
9 something wrong with them.
10 Q. And would the U.S. Supreme Court need to
11 find that there is something wrong with them?
12 MS. D'AMICO: Objection. Calls for a legal
13 conclusion.
14 You can answer.
15 THE WITNESS: I think if any court finds
16 there is something wrong with them, if it's
17 proven in court that they are not fair
18 districts, that they are gerrymandered in some
19 way, that something should be done to address
20 it.
21 BY MS. RIGGINS:
22 Q. Okay. Do you think that a state court, in
23 your understanding as a layperson of the way the
24 legal system works, has the ability to overturn a
25 federal court order?

A. I have no idea.

Q. Okay. So I heard you talk about whether or not these districts were fair.

Do you think that the districts drawn by the special master were fair?

A. I believe he drew the districts so that they were no longer racially gerrymandered.

Q. But you wouldn't classify them as fair?

A. I don't know that he looked for partisan gerrymandering.

Q. Okay. So in your opinion, do you think these maps are fair, as drawn by the special master?

A. I don't think all of the districts are fairly drawn, no.

Q. I'm going to show you another document that may look familiar.

(EXHIBIT NO. 9 MARKED FOR IDENTIFICATION.)

BY MS. RIGGINS:

Q. Is NQuickakaKaren your Twitter handle?

A. It is.

Q. And I see that on February 6, 2018, you replied to a tweet from Chris Hayes.

Can you read what your reply is?

A. "Don't forget North Carolina and our racially gerrymandered legislative districts. Court

order new districts. GOP drew new but still racially gerrymandered districts. Special master drew fair districts. GOP won't implement."

Q. So at some point you thought that the special master's districts that he drew that are in front of you were fair?

A. I thought they were racially gerrymandered, yes.

Q. So that's what you meant by "fair"?

A. Yes.

Q. Okay. Would you agree, based on our reading of the complaint and our discussion about these special master's districts, that the special master made some adjustments to district 59 after it was drawn by the General Assembly?

A. Yes.

Q. So if the special master made adjustments to that district, how has the General Assembly harmed you in the way that your district looks?

A. Because, as I mentioned, after the special master drew the districts, there were some adjustments made by the General Assembly.

Q. And do you think those adjustments were made after December 1st?

A. They were made in that time frame.

1 Q. Okay. So looking at the district maps, it
2 looks like both districts 58 and 60, the yellow and
3 green districts, clearly border 59, correct?
4 A. Yes.
5 Q. And that 57, 61 and 62 also border 59; is
6 that correct?
7 A. It's a big district.
8 Q. It is a big district.
9 Do you believe that district 61, 57 or 62
10 are packed?
11 A. I haven't looked at them, at the numbers.
12 Q. Okay. I'm going to show you 2018 election
13 results for House district 60, which you've alleged
14 are packed.
15 MS. RIGGINS: We'll mark this as Exhibit
16 10.
17 (EXHIBIT NO. 10 MARKED FOR IDENTIFICATION.)
18 BY MS. RIGGINS:
19 Q. And so on Exhibit 10, it shows that
20 Mr. Brockman won district 60 by about 69 percent?
21 A. Looks pretty packed, doesn't it?
22 Q. It does look pretty packed, if your
23 definition of packed is above 60 percent. It's a big
24 percentage difference. I agree with you.
25 Let's put Exhibit 10 to the side for a

1 second. And I'm going to show you the election
2 results for 2018 for House district 61.
3 MS. RIGGINS: We'll mark this as Exhibit
4 11.
5 (EXHIBIT NO. 11 MARKED FOR IDENTIFICATION.)
6 BY MS. RIGGINS:
7 Q. What is the percent victory for the
8 Democratic candidate on the 2018 election for this
9 district?
10 A. You're going to make me do math.
11 Q. I'm sorry, I'll tell you what. Is Pricey
12 Harrison a Democratic candidate?
13 A. Yes.
14 Q. And she's the representative for House
15 district 61?
16 A. Yes.
17 Q. And did she win with 73.3 percent of the
18 Democratic vote?
19 A. She did.
20 Q. So under your definition of packed, and
21 because you just said that 69 percent is a packed
22 district, would 61 also be a packed district?
23 A. I can see how you would come to that
24 conclusion, looking at the numbers.
25 Q. Okay. But as you stated earlier, district

61 is not being challenged in this lawsuit?

A. Yes, but there are other factors that come into play.

Q. Okay.

A. Pricey is an extremely popular candidate among all of the people in her district.

Q. That's fair. She's been a long-term member of the House of Representatives; isn't that correct?

A. She has, and she was running against an unknown.

Q. And do you think that generally running against an unknown candidate gives the incumbent quite an advantage?

A. It can give some.

Q. Okay. I'm also going to show you the election results for House district 57, for this past year.

MS. RIGGINS: We'll mark this as Exhibit 12.

(EXHIBIT NO. 12 MARKED FOR IDENTIFICATION.)

THE WITNESS: Well, you can't really judge that one, because the incumbent decided not to run, retired.

BY MS. RIGGINS:

Q. Okay. But did the Democratic candidate,

1 Ashton Clemmons, win with 67.57 percent of the vote?
2 A. She did, but the Republican didn't
3 campaign.
4 Q. But as we've discussed in our definition of
5 "packed," for a district above 60 percent, this
6 district would also be packed, by that metric?
7 A. By that metric, yes, it was. But the
8 Republican filed at the last minute so they would
9 have someone running against her when their incumbent
10 candidate decided not to run, and he did not actually
11 campaign or, you know, get out and try to get votes.
12 Q. So would this be an example like we were
13 discussing earlier where a bad candidate can lead to
14 poor Republican election turnout? Is that what
15 you're alleging here?
16 A. Yes.
17 Q. So it's also possible that that could
18 happen in House district 59?
19 A. It could.
20 Q. And you're not challenging, as a plaintiff,
21 that district 57 is packed?
22 A. I am not.
23 Q. But would you agree that 67.57 percent and
24 69 percent, which you said were clearly packed, is
25 roughly the same number?

1 A. I think it's interesting that you gave me
2 the party breakdown numbers for 59, but you gave me
3 the voter numbers here --
4 Q. I can give you the voter numbers for 59 if
5 you want. Your choices are either to go by district
6 on the State Board of Election's website or to print
7 a massive spreadsheet. Since you asked about it,
8 we'll do that.
9 A. Great.
10 (EXHIBIT NO. 13 MARKED FOR IDENTIFICATION.)
11 BY MS. RIGGINS:
12 Q. So by what percent did John Hardister win
13 in your district in 2018?
14 A. 13.
15 Q. But he won with 56.65 percent of the vote,
16 correct?
17 A. Yes.
18 Q. So that would be a more competitive
19 district than the elections conducted in 2018 than in
20 57, 61 or 60, correct, based on the election results
21 that we've looked at?
22 A. Yes.
23 Q. Do you think that was also a more
24 competitive race --
25 A. No.

1 Q. I wasn't finished with my question. I'm
2 sorry.
3 Do you think that was a more competitive
4 race than your old district, 58?
5 A. The previous 58?
6 Q. The current 58.
7 A. The current 58. Yes.
8 Q. Do you think that House district 58
9 election in 2018 was competitive?
10 A. No. Republicans did not put forth a
11 candidate.
12 Q. Republicans did not put forth a candidate?
13 A. A candidate ran, but he was not supported
14 by the Republican Party.
15 Q. So is that a situation in which support
16 from a state or county party could influence the
17 success of a candidate?
18 A. Are you familiar with that candidate?
19 Q. Not particularly.
20 A. He is semi-famous. He has a YouTube
21 channel and podcast and tends to spread a lot of hate
22 speech.
23 Q. Lovely. Not the best look for anyone
24 running for election, is it?
25 A. I would suggest -- I do not know, I would

1 suggest that has something to do with his numbers.
2 Q. I could agree with that.
3 And so looking at the special master's map,
4 do you think that now that we've seen that district
5 57 and 61 elected a Democrat by a pretty wide margin,
6 do you think that the makeup of those districts could
7 also impact the way that your district votes?
8 A. I would have to see what the breakdown is
9 of registered Dems versus Republicans in the district
10 to make a better judgment.
11 Q. Okay. But you would agree with me that,
12 based on the election results that we've seen, that
13 district 61 elected a Democrat candidate at a higher
14 percentage than district 60, which you allege is
15 packed?
16 A. Yes.
17 Q. Okay. And based on our earlier reading of
18 the amended complaint, we saw that the special master
19 redrew 57 and made material changes, in addition to
20 59, to 61 and 62; is that correct?
21 A. I believe so, yes.
22 Q. But that the special master didn't make any
23 changes to 60 or 58?
24 A. Sorry, bear with me one moment. My mind is
25 getting foggy.

1 Q. I'm reaching a really good spot for a
2 break. Just a little bit longer.
3 I can turn your attention to page 43 of the
4 complaint where it says House districts 58, 59 and 60
5 are within Guilford County. It says the other three
6 districts -- 57, 61 and 62 -- were redrawn by the
7 special master?
8 A. Yes.
9 Q. So why is it packing when the General
10 Assembly drew 60 and 58 but not packing when the
11 special master drew districts with similar
12 percentages?
13 A. The General Assembly stated specifically
14 that they drew those lines to win as many seats as
15 they could. So the intent is stated, whereas the
16 special master had the intent of drawing fair
17 districts.
18 Q. Okay. And is it your understanding that
19 the General Assembly or members of the General
20 Assembly made that statement with regards to
21 legislative districts or drawing congressional
22 districts?
23 A. Both.
24 MS. RIGGINS: Do we want to take a break
25 for lunch?

1 MS. D'AMICO: How much longer do you
2 anticipate going?
3 MS. RIGGINS: Probably at least another
4 hour, maybe a little longer.
5 MS. D'AMICO: Could we go off the record?
6 (RECESS TAKEN.)
7 BY MS. RIGGINS:
8 Q. So I'd like to talk a little bit more about
9 House district 59 as it is now and was used for the
10 2018 election.
11 And for this discussion -- I swear, I'm
12 almost done with exhibits -- I'm going to show you a
13 zoomed-in version of that map so that you can see
14 neighborhoods and whatnot.
15 A. Okay.
16 (EXHIBIT NO. 14 MARKED FOR IDENTIFICATION.)
17 BY MS. RIGGINS:
18 Q. So I'll represent to you that this is the
19 same map, but because I could zoom on this map, I
20 took it from the General Assembly's website so it's
21 different colors, just to add confusion.
22 So in this map, House district 59 is
23 purple.
24 A. Okay.
25 Q. And district 60 is still yellow, so we do

1 have one color that continuous. And then we have 58
2 that's blue.
3 And so this map does a little bit better
4 job, because it's zoomed in, of showing roads and
5 some neighborhoods.
6 So we've talked at length about the impact
7 of the amount of Democratic voters in 58 and 60 on
8 your district. So in looking at this map, do you
9 know what neighborhoods you might take out of 59 or
10 58 to change your district?
11 A. To change it to make it more fair?
12 Q. To make it more fair or to make it a
13 district more like the one you're seeking in this
14 lawsuit.
15 A. I am not, by any means, a mapmaker or
16 anything of that nature, but I would think you would
17 take a precinct or more out of current 58 and put
18 them back into 59.
19 Q. Okay. Do you have any idea of what
20 precinct that might be?
21 A. No.
22 Q. And when you take a precinct or two out of
23 58 and put it back into 59, in order to keep
24 population decently equal, wouldn't you need to take
25 a district out of 59 and put it back into 58?

A. Yes.

Q. So do you have any idea which areas you might swap districts for?

A. If you look at the map as it is right now, all of the areas -- and you're not showing the top of 59 here because it's not near the districts we're talking about, but all of the outside areas of this are huge majority Republican.

Your Democratic voters are in these precincts right here against the line on the east side of Greensboro here.

Q. Okay. So would you say -- let's put it this way: The voters that you say are largely Republican that are at the top of 59, you're talking about the border of Rockingham County?

A. Right. I'm saying all the way around. So these at the bottom, in these districts as well.

Q. So the districts that border Rockingham County or the precincts that border Randolph County and the districts that border Alamance County are largely Republican?

A. Yes.

Q. Are those rural areas of Guilford County, generally?

A. They're somewhat more suburban, bordering

on the rural.

Q. Would you say that the neighborhood you live in, in your precinct, is more urban or suburban than those?

A. A little bit. There's a mix. There's some farms and things still.

Q. That's good to know.

Because you're closer to the Greensboro city limits, and I believe you said earlier about to be annexed, correct?

A. Our community is, I guess what you'd call a bedroom community for people who work at the university.

Q. At UNCG?

A. A&T.

Q. Oh, A&T. I'm sorry. There's a bunch of universities in Greensboro.

Okay. And so the areas that you're talking about where the precincts are more Democratic, those tend to be closer to the urban area of Greensboro, correct?

A. Yes, they are.

Q. So you'd like to move some more urban voters in to district 59; is that correct?

A. Yes.

1 Q. And so which district would you move the
2 more rural or more suburban Republican members into?
3 Where would you find those?
4 A. I would imagine you would move some of
5 those rural red 59 precincts into the packed
6 districts.
7 Q. And that would alleviate your harm because
8 you're simultaneously, I guess, unpacking districts
9 60 and 58 --
10 A. Right.
11 Q. -- and moving Republicans into those
12 districts, and you're moving more Democrats into your
13 district of 59, correct?
14 A. Yes.
15 Q. So when you're moving these Republican
16 voters around, do you think that that's cracking
17 their vote?
18 A. I think, overall my desire is to have the
19 districts be competitive, more fair.
20 Q. Right. But do you think that, in moving
21 Republicans out of district 59, where they're
22 electing their candidate of choice, and into a
23 district where they most likely will not be able to
24 elect their candidate of choice, that those
25 Republicans are going to be harmed?

1 A. Doesn't that make all three districts more
2 fair for both sides?
3 Q. Well, we saw in the election results
4 earlier that Representative Hardister won that
5 district by 56 percent or he had a 56 percent
6 victory -- 56 percent of the vote. And we saw that
7 Representative Brockman won 69 percent of the vote.
8 And I'll represent to you -- I can show you the
9 election results if you'd like -- that Mr. Quick won
10 76 percent of the vote in district 58.
11 So the math doesn't quite add up, does it,
12 to make them within your competitive four-point
13 range?
14 So the Republicans that you move out of 59,
15 into 60 or 58, you're not going to be able to move
16 enough to make it competitive. It would still be
17 over 60 percent, correct?
18 A. Perhaps.
19 Q. Because if you -- let's say you moved 8
20 percent of the Republican voters out of 59 and into
21 58, you swapped the districts. So it would be a 48
22 percent Republican district and a 52 percent
23 Democratic district. You'd still have a 68 percent
24 Democratic district in 58.
25 MS. D'AMICO: I'm going to make an

1 objection on the record to these questions.
2 She's not an expert. She's not a mapmaker or a
3 mathematician.
4 MS. RIGGINS: No, she's not. But she's
5 already testified she is familiar or can be
6 familiar with the precincts and she would like
7 to move some precincts around, and 56 minus 8
8 doesn't require a math degree.
9 THE WITNESS: Well, I think, you know,
10 again, there are other factors to consider. I
11 think Hardister just moved into this district
12 and won by that margin, and he will be running
13 as an incumbent in the next election.
14 BY MS. RIGGINS:
15 Q. So you keep saying that Hardister moved
16 into this district.
17 A. Yes.
18 Q. Do you know if Hardister represented
19 district 59 prior to 2018?
20 A. Yes, but 59 wasn't here.
21 Q. That's fair.
22 A. He lived in northwest Greensboro. And when
23 the districts were redrawn, he was no longer in his
24 district or in district 59.
25 Q. Right.

A. So he moved over -- down here.

Q. So, in fact, when the map was redrawn, his old district became a majority Democratic district, didn't it?

A. I believe he was in this top one up here, yeah.

Q. So could one say that he might have been harmed because he had to move?

A. Well, he moved because two Republicans ended up in that same district, the way it was redrawn. And he didn't want to run against his friend. And he's single and his parents had real estate over here. He didn't initially move. He just claimed this as a residence and was able to run without much harm to himself or much effort.

Q. But going back to my question, originally, if you're going to move Republican voters out of 59 and into one of the packed districts, do you think that's going to harm the Republican voters?

A. I don't know. I think there's got to be a way -- a nonpartisan way for an independent party to draw these maps so that they're fair and that all people have their votes count and have a chance at being represented.

Q. Okay.

A. But I can't say what that is. I will admit that. I don't know what that is.

Q. So if a nonpartisan commissioner or something like that drew district 58 about the same way it is now, because it's a largely urban area, would you say that Republicans in that district still have a chance of having their vote count even if the district looked the same way?

A. I don't know.

Q. Okay. Let's put the maps aside.

So we've discussed that prior to this election, and prior to the 2017 redraw, you lived in district 58, correct?

A. Yes.

Q. And I think we've discussed that previously you voted for Representative Amos Quick, correct?

A. Yes.

Q. And that was in 2016?

A. Yes.

Q. Do you remember if Mr. Quick had a challenger that year?

A. I do not recall.

Q. Do you remember who you voted for in district 58 in 2014?

A. I do not.

1 Q. Does the name Ralph Johnson ring a bell?
2 A. Perhaps. Vaguely. I'm sorry.
3 Q. But you voted for a Democratic candidate?
4 A. Yes.
5 Q. And that Democratic candidate won?
6 A. Yes.
7 Q. And in 2012, do you remember voting for a
8 Democratic candidate?
9 A. I don't remember the candidate, but I
10 voted, yes, Democrat.
11 Q. Does the name Alma Adams ring a bell?
12 A. Oh, yeah.
13 Q. And do you remember any of those elections
14 being competitive?
15 A. I wasn't involved in the party at that
16 time, so I don't know.
17 Q. I'm going to show you a couple election
18 results for district 58.
19 (EXHIBIT NOS. 15-18 MARKED FOR IDENTIFICATION.)
20 BY MS. RIGGINS:
21 Q. So the last exhibit I gave you, Exhibit 18,
22 that's the election results for the 2018 election for
23 district 58, correct?
24 A. Yes.
25 Q. And what percent of the vote did

1 Representative Amos Quick win?
2 A. 76.78.
3 Q. Okay. And we would agree that's not
4 competitive?
5 A. Sure. I agree.
6 Q. And let's look at the election results for
7 2016. I believe that's 15. Unfortunately, it didn't
8 quite work out that all of the exhibit numbers
9 matched the years. Here it looks like Representative
10 Quick ran unopposed.
11 A. Yes.
12 Q. Then the election results for 2014. Does
13 it look like Mr. Johnson ran unopposed?
14 A. Yes.
15 Q. And then for 2012, looks like Ms. Adams had
16 an opponent but handedly won?
17 A. Yes.
18 Q. And what percentage is that?
19 A. 79.86.
20 MS. D'AMICO: Counsel, I don't have a copy
21 of the 2012.
22 MS. RIGGINS: Oh, you don't have a copy?
23 I'm sorry.
24 MS. D'AMICO: This is 2002. Is it supposed
25 to be 2012?

1 MS. RIGGINS: Oh, I'm sorry. There you go.
2 MS. D'AMICO: Thank you.
3 BY MS. RIGGINS:
4 Q. And so what percentage of the vote did we
5 say that Mr. Quick won with in 2018?
6 A. 76.78.
7 Q. And is that a lower percentage than the
8 previous three elections?
9 A. Yes.
10 Q. So was the 2018 election actually more
11 competitive than the previous three elections?
12 A. Yes.
13 Q. Given that high percentages that the
14 Democratic candidates were winning in district 58, do
15 you think that district 58 was packed from 2011 to
16 2017?
17 A. I don't know.
18 Q. Do you think that you were harmed by living
19 in a district with that many other Democrats?
20 A. I can only speak to the experience I've had
21 since not being in that district, so I don't know.
22 Q. But you would agree that the percentages
23 that these districts were winning at for Democratic
24 candidates is higher than it was for 2018, where you
25 allege that district 58 is packed, correct?

1 A. Yes.
2 Q. And so if you were still in district 58,
3 would you then be a packed voter?
4 A. Yes.
5 Q. So in either district you lived in, 58 or
6 59, you're harmed?
7 A. So it seems.
8 Q. Which district would you prefer to live in?
9 A. Well, I'd prefer to -- well, I like where I
10 live.
11 Q. But would you -- okay. Let me rephrase the
12 question.
13 Would you prefer that when the General
14 Assembly redrew the lines in 2017 and when the
15 special master altered those lines, that you were
16 left -- that your precinct was left in district 58?
17 A. Yes.
18 Q. So because as we've discussed, you'd prefer
19 to be represented by Mr. Quick. So essentially, do
20 you think other Democrats in these packed districts
21 would prefer -- would also prefer the Republican --
22 sorry, do you think that the districts that are
23 packed, 58 and 60, by your complaint, do you think
24 that Democrats don't enjoy being represented by a
25 Democrat?

A. I can't speak to what they think, but they seem happy with their representation. They keep reelecting.

Q. And you testified earlier that you would prefer to live in a packed district -- that you would have preferred to live in district 58, with these percentages, that you enjoyed living in district 58 more than you've enjoyed living in district 59?

MS. D'AMICO: Just want to put an objection on the record.

I think you corrected it with your second question, but I don't think she testified she would prefer to live in a packed district. I think she would prefer to live in her old district.

BY MS. RIGGINS:

Q. And your old district had candidates that won by 100 percent and 79 percent, for the previous three elections?

A. Yes, they did.

Q. Prior to the 2011 redistricting cycle, when you still lived on Clovelly Drive, you were still in district 58; is that correct?

A. I believe so.

Q. And do you remember if you were ever

1 represented by a Republican during that time?
2 A. Not that I recall.
3 Q. Would it ring a bell if I said that Alma
4 Adams represented you beginning in 2002 all the way
5 through 2012? Does that sound about right?
6 A. Sure.
7 Q. And do you remember any of those elections
8 being competitive?
9 A. I was not paying that close attention.
10 Q. But if those elections had similar margins
11 of victory, as we've seen over the last three
12 election cycles, would you consider those not
13 competitive?
14 A. Well, she did very well, didn't she?
15 Q. She did do very well.
16 So do you think it's possible that if you
17 were living in a packed district in the early 2000s,
18 up until the legislative redistricting redraw in
19 2017, that you were harmed for that decade and a
20 half?
21 A. I think someone was.
22 Q. As a Democratic voter, much like the
23 Democratic voters that you're alleging are harmed in
24 the current 58 and 60, do you think that you were
25 harmed in the same way?

1 A. In the same way that someone else was
2 harmed then?
3 Q. Yeah. So if you're alleging that people
4 that live -- that Democrats that live in House
5 district 60 and 58 now are packed and they're harmed
6 because the Democratic candidate is winning by 60
7 percent or more, if you lived in a district, from the
8 early 2000s up until 2017, that was electing a
9 Democratic candidate at above 60 percent, would you
10 be harmed in the same way that those voters are
11 harmed now?
12 A. Yes. And I'm not asking for the districts
13 to be redrawn so that only Democrats win. I think
14 they should be redrawn so that every vote counts and
15 everyone has a fair chance at representation,
16 regardless of what party that ends up being.
17 Q. Do you think it's possible to draw Guilford
18 County, with its six districts, so that all six
19 districts are competitive, given the urban center in
20 the county that is heavily Democratic?
21 A. I have no idea.
22 Q. Do you recall ever requesting any
23 constituent services in the early 2000s? I'll say
24 from 2002 to 2010.
25 A. Not that I recall.

1 Q. Do you ever recall contacting your
2 congressman, your state congressman from 2002
3 to 2010?
4 A. No.
5 Q. What about in 2012 to 2014?
6 A. No.
7 Q. I believe that you said that you've
8 communicated with Representative Quick beginning in
9 2016, correct?
10 A. Yes.
11 Q. And that now -- starting in 2018 and now,
12 that you have communicated with Representative
13 Hardister, correct?
14 A. Yes.
15 Q. In terms of levels of responsiveness,
16 you're only comparing Representative Quick and
17 Representative Hardister, correct?
18 A. Yes.
19 Q. Have you ever contacted Representative
20 Hardister for anything other than to share a policy
21 view? To ask for any constituent help or something
22 like that?
23 A. No.
24 Q. Do you know anyone who's contacted
25 Representative Hardister for constituent help, with

1 maybe like a missing pension check or something like
2 that, from the state?
3 A. No.
4 Q. Do you know anyone who's requested
5 constituent services from Representative Quick?
6 A. No.
7 Q. Do you generally think when constituents
8 contact their representative for constituent services
9 because of a nonpartisan reason, like a missing
10 pension check or whatever, that their staff asks
11 which political party they belong to before they help
12 them?
13 A. No.
14 Q. So it's possible that, regardless of which
15 political party you belong to and regardless of the
16 political party that the representative belongs to,
17 that you'll get the help you need from constituent
18 services?
19 A. Based upon that definition of services,
20 yes.
21 MS. RIGGINS: Can we have a five-minute
22 break? I think I may be about to wrap up.
23 MS. D'AMICO: Yeah.
24 (RECESS TAKEN.)
25 MS. RIGGINS: I don't have any other

1 questions for you. Your counsel may have some
2 redirect.
3 EXAMINATION
4 BY MS. D'AMICO:
5 Q. I have a couple of questions for you, but I
6 promise to make it as painless as possible.
7 So we've already talked about this, but I
8 want to go over it one more time: How often do you
9 vote?
10 A. I vote in every election now.
11 Q. And why do you make it a point to regularly
12 vote?
13 A. Because it makes a difference in our
14 day-to-day lives, you know, I mean, from local
15 elections up to state and federal.
16 I didn't realize until more recently how
17 important local elections were, in addition to
18 federal and state. But, you know, the federal and
19 state elections, I'm a big supporter of civil rights,
20 women's rights. I'm a big believer in education.
21 My background is in economics, and I
22 believe the only path to long-term economic growth is
23 a healthy and educated work force. So I believe in
24 affordable healthcare and a good public school
25 education for everyone.

1 So I tend a vote in state and federal
2 elections. You know, I've come to be more aware of
3 local issues more recently and how those affect me.
4 So I vote in local races as well now.
5 Q. So do you -- you said your House
6 representative right now is Representative Hardister.
7 A. Yes.
8 Q. Do you feel like he represents your views?
9 A. He does not. And those are some of the
10 issues, you know, I've called him about.
11 For instance, he gave -- he helped push
12 through a tax plan, because he's been the majority
13 whip in the legislature. He helped push through a
14 tax plan that gave tax cuts to the wealthy and to
15 corporations.
16 Companies like Duke Energy got a huge tax
17 cut, and then he didn't want to hold Duke accountable
18 for cleaning up their coal ash spills that got into
19 the water supply.
20 At the same time, he supported a sales tax
21 on services that affected poor people. Because, you
22 know, poor people, instead of going out and replacing
23 a car when they have an issue, they have a tendency
24 to take it in for a repair.
25 Now they not only have to pay for the parts

1 and labor, they have to pay for sales tax on the
2 labor, on the service. So it makes it more expensive
3 to have those services performed.
4 He supports the expansion of charter
5 schools and the voucher program. And my son, until
6 this year, was in one of the poorest schools in the
7 county because it is in that -- on that side of
8 Greensboro. That's a poor side of Greensboro.
9 And for two years, he was in a second-floor
10 classroom. The second floor did not have working AC.
11 The schools had teacher flight. He had teachers who
12 would leave in the middle of the semester who were
13 going out of state because they couldn't get the pay
14 they needed here.
15 The teachers, when they'd make copies,
16 they'd reduce the size of the worksheet or test to a
17 quarter of a sheet because they didn't have enough
18 paper to make copies for everybody. They didn't have
19 enough textbooks.
20 So, you know, all of those things were very
21 important to me. And to see him taking money that
22 could be invested in our public schools and moving
23 that to charter schools, or as he is now, supporting
24 vouchers for people who -- households that make
25 $70,000 a year so they can leave the poor schools and

1 go to another school, when the people in the
2 neighborhood can't afford to do that, because those
3 schools don't provide transportation or free lunches.
4 It seems incredibly unfair to me.
5 Q. In terms of your status as a resident of
6 House district 59, how has the 2017 map impacted your
7 ability to participate in the political process?
8 MS. RIGGINS: I'm going to object because
9 she didn't vote on the 2017 map.
10 But you can answer.
11 BY MS. D'AMICO:
12 Q. Go ahead and answer. I can repeat the
13 question if you'd like.
14 A. Yes, please.
15 Q. In terms of your status as a resident of
16 House district 59, how has the 2017 map impacted your
17 ability to participate in the political process?
18 A. The 2017 map means my voice is basically so
19 diluted, my vote doesn't count. So all of those
20 issues that are important to me and to the other
21 people in my precinct in that area of Greensboro
22 don't get addressed.
23 Q. Okay. You've been testifying about your
24 district in particular. I know there's been some
25 testimony about the map as a whole as well, but are

1 you aware of any impact that the 2017 plan has had in
2 other state legislative races besides your district?
3 A. I know that -- my understanding is that the
4 district on the opposite side of the county as well,
5 which I think is currently represented by John
6 Faircloth, is in a similar situation, where all of
7 those Democratic votes were packed in to 58 and 60,
8 right?
9 And I think that that district now is
10 predominantly red as well and has been considered
11 unwinnable. I think the Democratic candidate there
12 in the past election raised more money than any
13 legislative candidate in the state, but still
14 couldn't come close to running a competitive race.
15 Q. Okay. So last question from me: You've
16 devoted a lot of time and energy to this case,
17 including this extensive deposition, and you've
18 really put yourself out there by agreeing to be a
19 plaintiff in this lawsuit.
20 So my final question for you is, why is
21 this issue so important to you?
22 A. Well, I mean, as I mentioned, this
23 legislature affects our lives. I have -- I have been
24 personally affected, my child has, by the lack of
25 funding for education, by the prioritization of

1 charter schools. Over 400,000 people in our state
2 have been affected by this state legislature's
3 refusal to expand Medicaid, which they could have
4 done at no cost to the state. That could have been
5 free money at the time, from the federal government,
6 to expand Medicaid and provide an additional 400,000
7 people affordable healthcare, and this legislature
8 refused to do it, for partisan reasons.
9 I have friends who are trans and have been
10 affected by HB2, and even this compromised bill,
11 which isn't a true compromise. I have neighbors who
12 are scared to death to go out into their communities
13 because now they know that they can be stopped and
14 asked for their papers by ICE at any time.
15 So it's not just -- for me, it's not just
16 politics. It's people's lives that are dramatically
17 affected. And if I don't fight for them and for
18 myself, who will?
19 MS. D'AMICO: That's all from me.
20 FURTHER EXAMINATION
21 BY MS. RIGGINS:
22 Q. I've got a few questions.
23 Was HB2 repealed?
24 A. It wasn't a full repeal.
25 Q. But a large portion of HB2 was repealed?

1 A. They will say so, but you still can't use a
2 bathroom that identifies with your gender if you
3 are -- weren't born that way or if you haven't
4 already had surgery.
5 Q. And I heard your counsel ask you about the
6 impact of the redistricting on other districts in the
7 state.
8 Are you challenging your district or the
9 map as a whole?
10 A. The map as a whole.
11 Q. Okay. And so how does redistricting in
12 Cumberland County, around Fayetteville, impact you?
13 A. Well, I think, overall, gerrymandering
14 affects everyone, because there isn't fair
15 representation at all levels of government when you
16 have gerrymandered districts.
17 And I think that I have a general sense of
18 what is just. And again, I'm not asking that all
19 districts be drawn so that Democrats are elected in
20 every district. I support Democratic platform and
21 principals, but I also am a big believer that
22 everybody deserves representation.
23 And if you have districts where people
24 aren't even going to bother to go out and vote
25 because there is no point, they know that their vote

1 has no chance of making a difference, then that's not
2 happening.
3 Q. So you've mentioned people -- you just said
4 that people aren't going out to vote because they
5 think there is no point.
6 Who specifically, in your district, have
7 you spoken with that doesn't vote?
8 A. I can't give you specifics in my district,
9 and I will acknowledge that my specific precinct has
10 the highest turnout in the county, so yay us, but I
11 can't speak for anyone specifically.
12 Q. Okay.
13 A. It is a general concern that I've heard
14 from the community.
15 Q. But you can't speak to anyone specifically?
16 A. No, I cannot.
17 Q. And do you think that voter apathy or low
18 voter turnout is a problem just in North Carolina, or
19 do you think that's a nationwide problem?
20 A. I think anywhere people feel
21 disenfranchised it becomes a problem.
22 Q. Do you think that the United States
23 generally has a high voter turnout?
24 A. No. I think that we do things to
25 discourage or make it harder to vote.

1 Q. And do you think that that's limited just
2 to North Carolina?
3 A. No.
4 Q. We talked earlier about how your work with
5 the Democratic Party involves registering voters and
6 getting out the vote.
7 Have you ever had an instance, after the
8 2017 plans were enacted, where someone refused to
9 register to vote because of gerrymandering?
10 A. I've had several cases not related to that
11 case, but related to the congressional gerrymandering
12 in our county.
13 Q. But none related to the legislative?
14 A. I'm not remembering any specific ones off
15 the top of my head.
16 Q. Okay. And so we talked about how -- or you
17 talked about, with your counsel, how gerrymandering
18 impacts the state as a whole and how it impacts the
19 overall makeup of the General Assembly.
20 Do you think that the makeup of the General
21 Assembly should reflect the general makeup of the
22 state as a whole, or do you think that
23 representatives should be elected based on the makeup
24 of their specific districts?
25 A. I think if -- and this is just an opinion,

1 because, again, I don't know what the answer is to
2 drawing fair districts, but I think that overall, if
3 we have fair districts, that the makeup of the
4 General Assembly as a whole would be representative
5 of the state as a whole.
6 Q. Do you know what proportional
7 representation is?
8 A. I do.
9 Q. Can you tell me what proportional
10 representation is?
11 A. I believe that's the sort of thing they
12 have in Great Britain where, you know, the number of
13 votes gives a certain party that many members in
14 parliament or something of that nature, isn't it?
15 Q. Let me dial it back a little bit.
16 Do you think what you just described, where
17 the voting is done not district-specific,
18 necessarily, but as a whole, to make up the district
19 of the state, do you think that's more akin to
20 proportional representation, because the district is
21 more proportional to the statewide total of Democrats
22 or Republicans versus the proportion for that
23 district?
24 A. No. But I think, when you look at the
25 legislature and it is two-thirds Republican and you

1 know that the state is fairly divided between
2 Democrats and Republicans, that it's indicative of a
3 problem.
4 Q. Okay. So let's say, for example -- let's
5 focus on Guilford County for a second.
6 If there were twice the amount of
7 Democratic voters in Guilford County as Republican
8 voters, would you expect the Democrats would win
9 double the seats for the House that are located in
10 Guilford County? Would that seem like a fair outcome
11 to you?
12 A. I imagine so, if the districts were fairly
13 drawn.
14 Q. Okay.
15 MS. RIGGINS: Can we mark this as Exhibit
16 19.
17 (EXHIBIT NO. 19 MARKED FOR IDENTIFICATION.)
18 BY MS. RIGGINS:
19 Q. So this is the party registration
20 statistics as pulled from the State Board of
21 Elections website the week before the 2018 election.
22 A. Okay.
23 Q. Now, I'm not going to get super precise,
24 because I went to law school to avoid that. But if
25 you look at the top two lines here where it says,

1 "Democratic and Republican registered voters," would
2 you agree with me that there are roughly double the
3 members or double the amount of Democratic registered
4 voters than Republicans?
5 A. There are.
6 Q. Plus or minus some percentage. I get that
7 my math --
8 A. Again, our unaffiliated tend to vote
9 Republican.
10 Q. Are you saying the amount of maybe
11 conservative or Republican-leaning voters is actually
12 more than half of the Democratic votes?
13 Would you consider it more even in terms of
14 people that actually vote for Republicans?
15 A. Yes.
16 Q. So under these statistics, and if
17 unaffiliated voters in Guilford County are
18 traditionally voting for Republican candidates, would
19 you say that it would be a fair outcome for three of
20 Guilford County House districts to go for Republicans
21 and three to go for Democrats?
22 A. Are there six? Yeah.
23 Q. Yeah, there are six. So three and three
24 would be about fair?
25 A. Sure.

1 Q. Okay. And if we were just comparing
2 Democrats and Republicans, and Republicans were half
3 the number of Democratic voters --
4 A. Four and two.
5 Q. Four and two. Okay.
6 Let's go back to the special master's map
7 really quickly, and it's the map that says, "Special
8 master's recommended House plan."
9 A Republican represents district 59,
10 correct?
11 A. Yes.
12 Q. And a Republican represents district 62,
13 correct? I believe you said it was John Faircloth?
14 A. Yes.
15 Q. Do Republicans represent any of the other
16 four districts?
17 A. No.
18 Q. So it's a four-to-six split?
19 A. Four-to-two.
20 Q. Four-to-two split. So four of the six
21 districts are represented by Democrats?
22 A. Yes.
23 Q. Which is what we just said a moment ago
24 would be a fair and proportional outcome, correct?
25 A. Yes.

1 Q. So going back quickly, where you listed off
2 the issues that were important to you. And I'm just
3 going to recap some of them: Education,
4 specifically, with the charter schools; tax breaks;
5 Medicaid.
6 Do you think that Republicans generally
7 tend to agree with your position on those policy
8 issues?
9 A. No.
10 Q. Do you think that you're entitled to
11 representation where your representative agrees with
12 your policy issues?
13 A. Again, I'm just entitled to have my vote
14 count and not be diluted.
15 Q. But you don't think you're entitled to a
16 representative that agrees with you?
17 A. No.
18 Q. Do you think that a representative
19 should -- when voting on policy choices, should vote
20 the way the majority of their district would prefer
21 on those issues?
22 A. Yes.
23 Q. And if district 59 is a majority Republican
24 district, that Mr. Hardister should vote the way
25 Republicans would vote on those policy issues?

1 A. Sure.
2 Q. Do you know who Rachel Hunt is?
3 A. Is that Jim Hunt's daughter?
4 Q. It is. And do you know that she was
5 recently elected to the North Carolina House of
6 Representatives?
7 A. Yes.
8 Q. Do you know how much money she raised,
9 roughly?
10 A. A lot. I don't know.
11 Q. Would it surprise you to know it was close
12 to $4 million?
13 A. That is quite a bit.
14 Q. That's quite a bit for a House race.
15 Do you think that Martha Schaefer, John
16 Faircloth's opponent, raised $4 million?
17 A. No.
18 Q. So you would agree with me that she did not
19 raise the most of any Democratic candidate for House,
20 as you mentioned earlier?
21 A. No. I apologize.
22 Q. It was a weird House election. When I saw
23 that campaign finance report, I went "Wow."
24 A. I think that must have been an outlier.
25 Q. It was a very expensive House race, yes.

She got almost a million dollars from the state party.

Did you know that?

A. No.

Q. Your face said you didn't know that. She got almost a million dollars from the state party. Yes, she did.

A. Wow.

Q. Yeah, I was shocked. A lot of federal races don't spend that much money. I just wanted to clear that up for the record.

A. I correct myself.

FURTHER EXAMINATION

BY MS. D'AMICO:

Q. I have one redirect. I'm sorry. I said, "last question." It was not true.

If you'd look at Exhibit 8 for me, which was the special master's recommended House plan, you just established -- we just established that the current outcome is a proportionate outcome in the sense that the number of districts here, of the six, there are four that are represented by Democrats and two by Republicans; is that correct?

A. Yes.

Q. And when we were establishing that, we were

1 looking at the voter registration numbers; is that
2 right?
3 A. Yes.
4 Q. And this is the current makeup of the
5 districts, right -- four Democrats, two Republicans?
6 A. Yes.
7 Q. Do you believe that the map as drawn this
8 way is fair?
9 A. I do not.
10 Q. Can you explain for the record why you do
11 not?
12 A. Because all of those Democrats are
13 packed -- I mean --
14 Q. Sorry, in which counties? I know you're
15 pointing to the map.
16 A. In districts 58 and 60.
17 Q. And district 59, where you live?
18 A. Is filled with Republicans and
19 unaffiliated, who vote Republican, apparently.
20 Q. Okay.
21 MS. D'AMICO: That's it for me.
22 FURTHER EXAMINATION
23 BY MS. RIGGINS:
24 Q. I'm going to ask one question about that,
25 though.

1 So we established earlier when we were
2 looking at this, you said a four-out-of-two ratio
3 would be fair, looking at these numbers, just solely
4 on Democratic/Republican.
5 But if you counted the fact that, in your
6 view, most unaffiliated voters vote for Republican
7 candidates, it should be closer to three and three,
8 correct?
9 A. Yes.
10 Q. Under the situation for which you believe
11 conservative unaffiliated voters vote, in fact, the
12 district is not fair to Republicans, because they
13 should have one more district?
14 A. They should have at least a more
15 competitive district, a chance.
16 FURTHER EXAMINATION
17 BY MS. D'AMICO:
18 Q. We're talking about for proportional
19 representation, correct?
20 A. Yes.
21 MS. D'AMICO: Okay.
22 COURT REPORTER: Do you both want to order
23 a copy of the transcript?
24 MS. D'AMICO: Yes.
25 MS. RIGGINS: Yes.

1 (SIGNATURE RESERVED.)
2 (DEPOSITION CONCLUDED AT 1:44 P.M.)
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WITNESS CERTIFICATION

I, L. NICOLE QUICK, do hereby certify that I have read and examined the contents of the foregoing testimony as given by me on May 16, 2019, and that to the best of my knowledge and belief the foregoing pages are a complete and accurate record of the testimony given by me, except as noted on the Errata Sheet attached hereto.

I have ____ have not ____ made changes/corrections.

_____
L. NICOLE QUICK

I, _____, Notary Public for the County of _____, State of _____, hereby certify that the herein above-named appeared before me this the _____ day of _____, 20___; and that I personally witnessed the execution of this document for the intents and purposes as herein-above described.

(Official Seal)

_____
Notary Public

My commission expires: _____

1 ERRATA SHEET
RE: COMMON CAUSE, et al. v. DAVID R. LEWIS, et al.
2 DEPOSITION OF: L. NICOLE QUICK
DATE TAKEN: MAY 16, 2019
3
Please read this transcript with care. If you find
4 any corrections or changes you wish made, list them by page
and line number below. DO NOT WRITE IN THE TRANSCRIPT
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to this office. We appreciate your prompt attention to this
6 matter.

7 To assist you in making any corrections, please use
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9 Page Line Correction or Change/Reason for Change

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25 AHM L. NICOLE QUICK

STATE OF NORTH CAROLINA

COUNTY OF FORSYTH

CERTIFICATE OF REPORTER

I, APRIL H. MARSH, Notary Public, do hereby certify that the witness whose testimony appears in the foregoing transcript was duly sworn or affirmed by me prior to the taking of the foregoing proceeding; that said proceeding was taken by me to the best of my ability and transcribed under my supervision and direction; that the parties were present as stated; and that I am not of counsel for, related to, in the employment of any of the parties to this action, nor am I financially or otherwise interested in the outcome of this action.

I do further certify that the foregoing pages constitute a true and accurate transcript of the proceedings.

This the 20th day of May 2019.

_____
April H. Marsh
Notary Public Number 201119500253

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