

THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA STATE CONFERENCE
OF THE NAACP, et al.,
Plaintiffs,

vs. CASE NO. 1:16-cv-02852-AT

GWINNETT COUNTY, GA, et al.,
Defendants.

- - -

Videotaped Deposition of
MARY KAY MURPHY,

Taken by Julie M. Houk,
Before Joel P. Moyer,
Certified Court Reporter,

At the Offices of
Gwinnett County Public Schools,
Lawrenceville, Georgia,

On Wednesday, October 11, 2017,
Beginning at 10:17 a.m. & ending at 6:02 p.m.

Volume of Testimony
(Exhibits Contained in Separate Volume)

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October 11, 2017

10:17 a.m.

(Whereupon the reporter provided a written disclosure to all counsel pursuant to Article 8.B. of the Rules and Regulations of the Board of Court Reporting.)

(Whereupon a document was identified as Plaintiff's Exhibit 48.)

THE VIDEOGRAPHER: We're now on the video record. This is the beginning of video file number one. The time is 10:17 a.m.

Would the court reporter please swear in the witness.

(Whereupon the witness was sworn.)

MS. HOUK: Good morning, Dr. Murphy.

THE WITNESS: Good morning.

MS. HOUK: My name is Julie Houk.

THE WITNESS: Ms. Houk.

MS. HOUK: I'm with the Lawyers' Committee for Civil Rights Under Law. I'm one of the attorneys representing the Plaintiffs in this case, and I'll be taking your deposition this morning.

Before we get started, I'd like to go around the room and get introductions of

1 some people that I don't recognize here. If we
2 can get a record of who's in attendance, I'd
3 appreciate it.

4 MS. BOYCE: I'm Carole Boyce. I'm
5 another one of the School Board members.

6 MS. HOUK: Good morning.

7 MR. MURPHY: My name is Michael
8 Murphy, and I'm here -- I'm an attorney. I'm
9 representing my wife, Mary Kay Murphy --

10 MS. HOUK: Okay.

11 MR. MURPHY: -- in her individual
12 capacity.

13 MS. HOUK: Thank you. And we have
14 counsel for the School Board.

15 MR. COFFMAN: Yes. Vicky Sweeny and
16 Andrew Coffman.

17 MS. HOUK: Okay. Mr. Carothers,
18 Brian --

19 MR. DEMPSEY: Dempsey.

20 MS. HOUK: -- Dempsey.

21 MR. DEMPSEY: Yes.

22 MR. COFFMAN: And Mr. Park.

23 MR. PARK: I'm Jack Park, and I'm
24 with Strickland Brockington Lewis.

25 MS. HOUK: Okay. Thank you all.

1 MARY KAY MURPHY,
2 being first duly sworn, was examined and
3 testified as follows:

4 EXAMINATION

5 BY MS. HOUK:

6 Q Dr. Murphy, have you ever been
7 deposed previously?

8 A Yes, I have.

9 Q On how many occasions?

10 A One.

11 Q When was that?

12 A Approximately 1997.

13 Q What type of matter was that in
14 which you were deposed?

15 A It related to a redistricting of --
16 in District 3.

17 Q Okay. And that was in 1997?

18 A Yes, approximately then.

19 Q Was that when you first ran for the
20 School Board?

21 A Yes. I ran for the School Board in
22 1996.

23 Q Okay. And were you a named
24 defendant in that case?

25 A We were.

1 Q Okay. And who was your attorney in
2 that case?

3 A Mr. Parks; Ms. Sweeny; my husband,
4 Mike Murphy.

5 Q Who brought the case?

6 A Plaintiffs in District 3.

7 Q Do you recall any of their names?

8 A One was Aaron Lupuloff.

9 Q Do you know the spelling of the
10 name, last name?

11 A Surely. A-A-R-O-N, Lupuloff,
12 L-U-P-U-L-O-F-F.

13 Q Were there any other plaintiffs in
14 that case?

15 A There may have been, but I don't
16 recall their names.

17 Q Do you recall who represented the
18 plaintiffs in that case?

19 A No.

20 Q What was the claim?

21 A They were concerned that the
22 redistricting had not been fair.

23 Q What was Mr. Lupuloff's race? Do
24 you recall?

25 A He's Caucasian.

1 Q Do you recall what the plaintiffs
2 generally were claiming was unfair about the
3 redistricting?

4 A There had been a plan called K235.

5 Q Was that a school attendance
6 redistricting claim, or was that a School Board
7 member district, voting district claim, if you
8 know?

9 A Let me think about it. Give me the
10 options again, please.

11 Q Was this a claim where the
12 plaintiffs were alleging there was some problem
13 in how the attendance areas for the schools
14 were being drawn in terms of school attendance
15 versus a voting district for --

16 A Yes, the former.

17 Q Okay. So just, although you've been
18 deposed before, I want to go over sort of some
19 of the general ground rules so that we're clear
20 on the process this morning.

21 A Thank you.

22 Q As I said, I'm taking your
23 deposition. You've just taken the oath, so
24 you're sworn to tell the truth as you would in
25 a court of law. Do you understand that?

1 A I do.

2 Q And if there's breaks in between
3 during the course of the deposition, you remain
4 under oath when you come back from those
5 breaks.

6 A Yes, ma'am.

7 Q And I'm going to try and be clear
8 with my questions, and sometimes I'm not. Or
9 if you don't understand what I'm asking, please
10 let me know, and I'll try and rephrase the
11 question --

12 A Thank you.

13 Q -- for you. Another thing I want to
14 emphasize is that the court reporter is very
15 good, but he can only take really one of us
16 talking at a time.

17 A All right.

18 Q So it's very important for you to
19 wait until I complete my question before you
20 start to answer so we're not talking over each
21 other.

22 A Thank you very much.

23 Q And it's also important to give
24 audible answers, like yes or no, rather uh-huh
25 or huh-uh because the yes or no translates much

1 better on the record --

2 A Yes.

3 Q -- than those other verbal
4 responses. And if I ask you a question, such
5 as a date that might have happened some time
6 ago and you don't know exactly what the date
7 was, if you have a best estimate, you can give
8 that and qualify your answer to say that you're
9 estimating.

10 A Thank you.

11 Q Is that fair?

12 A Okay.

13 Q And if you want to take a break
14 during the course of the deposition, please let
15 me know. You know, I don't want to make you
16 tired, or this isn't a torture experiment, so I
17 want to make sure that, you know, you're
18 comfortable throughout the day.

19 A Thank you. I appreciate that.

20 Q Is there any reason that you know of
21 that your deposition cannot go forward today?

22 A No.

23 Q Going back to the 1997 school
24 attendance district lawsuit, how was that case
25 resolved?

1 A It was resolved in favor of the
2 School System.

3 Q Do you recall what court that was
4 filed in, whether it was state or federal
5 court?

6 A I don't.

7 Q Were you -- you were deposed in that
8 case?

9 A I was.

10 Q Did you testify in court in that
11 case as well?

12 A No, no.

13 Q Do you know if Aaron Lupuloff is
14 still residing in District 3?

15 A Yes. Yes, he is.

16 Q Have you been deposed on any other
17 occasion?

18 A I have not.

19 Q Have you ever testified in court on
20 any occasion?

21 A No.

22 Q Have you ever been subpoenaed to
23 testify in any court proceeding?

24 A No.

25 Q I want to talk a little bit about

1 your general background. Did you grow up in
2 Georgia?

3 A No.

4 Q Where did you grow up?

5 A Colorado.

6 Q And when did you move to Georgia?

7 A 19 -- 1959.

8 Q When you moved to Georgia, did you
9 move to the Gwinnett --

10 A No.

11 Q -- area? Where were you living at
12 first?

13 A Moultrie, Georgia.

14 Q Where is that?

15 A South Georgia.

16 Q When did you move to Gwinnett
17 County?

18 A 1992.

19 Q When you moved to Moultrie, Georgia,
20 in 1959, were the schools segregated at that
21 time?

22 A They were.

23 Q And how old were you at the time you
24 were living in Moultrie?

25 A 22.

1 Q Were you working at that time?
2 A I was.
3 Q What was your profession?
4 A I was teaching.
5 Q Were you teaching in the public
6 schools --
7 A Yes.
8 Q Let me finish my question.
9 A Oh, forgive me. I'm sorry.
10 Q I do that too, so just be conscious
11 of it --
12 A Thank you.
13 Q -- so that we can avoid talking over
14 each other. So you were teaching in Moultrie,
15 Georgia, in public schools in 1959?
16 A Correct.
17 Q And the schools were segregated
18 then?
19 A They were.
20 Q Were you teaching in a school that
21 was a white school or a minority school?
22 A I was teaching in a white school.
23 Q What age groups were you teaching?
24 A Middle school.
25 Q And what subjects were you teaching?

1 A English, English and social studies.

2 Q How long were you teaching in the
3 Moultrie school district schools?

4 A From September till December.

5 Q All in 1959?

6 A Correct.

7 Q And then what did you do next in
8 terms of your career?

9 A My husband was in the Air Force, and
10 we moved to Sacramento, California.

11 Q When you were teaching in the
12 Moultrie school district in 1959, did you think
13 the segregated system was fair to black
14 students?

15 A I had no opinion.

16 Q Were you in favor of segregated
17 schools at that time?

18 A I had no opinion.

19 Q You have no opinion now?

20 A No. You asked me, I thought --
21 excuse me, Ms. Houk. I thought you said 1959.

22 Q Do you have an opinion now that's
23 different than it was in 1959?

24 A No.

25 Q When you moved to Sacramento,

1 California, were you teaching there?

2 A Yes.

3 Q Were those schools segregated?

4 A I -- I'm trying to recall. I don't
5 believe they were.

6 Q Prior --

7 A No, no. I would say they were. I
8 can't, I can't give any example of students
9 who -- I can't -- I don't know. I'll have to
10 say that to you.

11 Q Okay. Were you teaching in a
12 Sacramento public school?

13 A Yes, I was.

14 Q Do you know if there was a formal
15 policy of segregation in Sacramento,
16 California, at that time?

17 A I don't know.

18 Q When you were teaching in
19 Sacramento, how long did you teach there?

20 A Six months.

21 Q So was that approximately the
22 beginning or the first half of 1960?

23 A Yes.

24 Q And what did you do next?

25 A We -- my husband had another

1 military assignment to Marietta, Georgia.

2 Q And when did you move to Marietta?

3 A 1960.

4 Q And were you teaching at that time?

5 A I was.

6 Q In the -- was that Gwinnett County
7 at that time?

8 A No. It was Marietta City Schools.

9 Q And were those schools segregated?

10 A They were by law.

11 Q And were you aware that the governor
12 of Georgia issued an order that there would be
13 no public funding of education if a school is
14 not segregated?

15 A I was.

16 Q What was your opinion of that order
17 at that time?

18 A I don't recall.

19 Q Do you have an opinion about it now?

20 A I don't.

21 Q How long did you teach in the
22 Marietta public schools?

23 A Five years.

24 Q When you taught in Marietta, what
25 grade level were you teaching?

1 A High school.

2 Q What subjects did you teach in high
3 school?

4 A English.

5 MR. COFFMAN: Be sure she finishes
6 her question.

7 THE WITNESS: I'm so sorry.

8 Q I know some people want to rush out
9 of here, but it's better to get a clear record.

10 A I just wanted you to know. English.

11 Q Did you teach all grade levels in
12 high school?

13 A I did.

14 Q So that takes us up to about 1965?

15 A Yes, ma'am.

16 Q And what did you do then?

17 A I'm -- my husband left the Air
18 Force. We moved to DeKalb County. He attended
19 law school, and I taught in the public schools
20 of DeKalb County.

21 Q That was starting in '65?

22 A Yes, ma'am.

23 Q What grade level were you teaching
24 in DeKalb?

25 A Tenth grade.

1 Q Were you also teaching English?

2 A English.

3 Q And were the schools segregated at
4 that time?

5 A They were.

6 Q And what was your opinion of the
7 segregated school system in DeKalb County at
8 that time?

9 A I don't recall.

10 Q Do you have an opinion about it now?

11 A I don't recall.

12 Q Did you believe black children in
13 DeKalb County were getting an equal education
14 to their white counterparts in the --

15 A I don't know.

16 Q -- segregated system?

17 A I don't know.

18 Q Did you ever hear -- excuse me. Did
19 you ever hear any complaints about the
20 segregated schools in DeKalb County?

21 A No.

22 Q In 1965, that was when the Voting
23 Rights Act was first passed. Were you aware of
24 that?

25 A I was.

1 Q Do you have an opinion about the
2 passage of the Voting Rights Act?

3 A No. I don't recall.

4 Q Do you have an opinion about it now?

5 A I don't recall.

6 Q Were you aware when you were living
7 in Georgia in 1959 that black people were given
8 a literacy test in order to be able to qualify
9 to vote?

10 A I don't recall.

11 Q Did you ever become aware of that?

12 A I, I don't have enough information.

13 Q How long did you teach in the DeKalb
14 public school system?

15 A One year.

16 Q Why did you leave after one year?

17 A I moved to the Georgia Department of
18 Education.

19 Q Was that in approximately 1966?

20 A Yes, ma'am.

21 Q And what did you do for the Georgia
22 Department of Education?

23 A I was a technical writer.

24 Q Could you generally describe what
25 that meant?

1 A Preparing proposals for funding.

2 Q And what type of funding proposals
3 were there?

4 A For technical education.

5 Q And how long were you at the --

6 A I was there for three years.

7 Q So that takes us to about 1969?

8 A Correct.

9 Q And what did you do after then?

10 A I went to work for the Southern
11 Regional Education Board.

12 Q I'm sorry. Could you --

13 A I'm sorry. Southern Regional
14 Education Board.

15 Q And what is the Southern Regional
16 Educational Board?

17 A It's a compact of 14 states.

18 Q And what do they do or did they do
19 at that time?

20 A They still are in operation. They
21 legislate -- I'm sorry. They advocate for
22 legislation. They secure public and private
23 funds.

24 Q And what did you do for them?

25 A I was, again, a writer.

1 Q In the fund-raising sphere also?

2 A No. Publications and
3 communications.

4 Q And how long were you at the
5 Southern Regional?

6 A I was there for almost three years.

7 Q So that takes us to about 1972?

8 A Let's say '71.

9 Q '71. And what did you do next?

10 A We had twin daughters.

11 Q And at that point, did you take some
12 time away from --

13 A Yes, ma'am.

14 Q -- formal work in a workplace?

15 A Yes, I did.

16 Q And what did you do next?

17 A I worked at The Lovett School
18 part-time.

19 Q And where's The Lovett School?

20 A Pardon?

21 Q Where is The Lovett School?

22 A It's in Atlanta.

23 Q And approximately how long did you
24 work there?

25 A Five years.

1 Q And what did you do there?

2 A I directed their publications and
3 information programs.

4 Q So that takes us to about 1976?

5 A Yes, ma'am.

6 Q Sometime during the 1970s, did you
7 become aware that Georgia schools began or --
8 began the process of desegregation?

9 A Yes.

10 Q And what was your opinion of that?

11 A I have no opinion.

12 Q Were you in favor of it?

13 A I have no opinion.

14 Q Were you in favor of it at the time?

15 A I don't recall.

16 Q In any of your writing work, did you
17 ever advocate against desegregation in any way?

18 A No.

19 Q Did you ever take a public position
20 against desegregation?

21 A No.

22 Q Were you teaching -- strike that.

23 When you were working at The Lovett
24 School in their publications and information
25 area, was that school segregated?

1 A No.

2 Q Do you know when it became
3 desegregated?

4 A I don't.

5 Q Did you work with students at all in
6 your job?

7 A No.

8 Q After you left The Lovett School in
9 about 1976, what did you do next?

10 A I went to Georgia State University
11 full-time to get a Ph.D.

12 Q Let me just backtrack a little bit
13 before then on your educational history to
14 catch up to that.

15 A Sure.

16 Q Where did you get your undergraduate
17 degree?

18 A Loretto Heights College in Denver,
19 Colorado.

20 Q Was that a four-year program?

21 A Yes, it was.

22 Q And what was your major there?

23 A English.

24 Q And when did you attend Loretto
25 Heights College?

1 A From 1956 to 1960. And it's a
2 college operated by nuns, the Loretto nuns.

3 Q And after you completed your program
4 at the Loretto Heights College -- is that
5 L-O-R-E-T-T-O?

6 A Correct.

7 Q -- did you study elsewhere before
8 you went to Georgia State?

9 A Yes. I studied at Emory University
10 in Atlanta.

11 Q Was that a master's program?

12 A Master's program in English and
13 education.

14 Q And during what years did you attend
15 Emory?

16 A I attended Emory from '65 to '68.

17 Q And you received an MA in English
18 and --

19 A MEd.

20 Q And what year did you start at
21 Georgia State?

22 A 1976 and ended at 1980.

23 Q And your Ph.D. program was in what
24 area?

25 A Educational leadership, higher

1 education.

2 Q And what was the focus of the
3 educational leadership part of the program?

4 A On organizational development,
5 leadership development.

6 Q And you said you attended that
7 program full-time, so you weren't working
8 during that period?

9 A That's correct.

10 Q What was your next employment
11 position?

12 A I went to Georgia Tech, the Georgia
13 Institute of Technology, from 1980 to 1989.

14 Q Were you working there or studying
15 there or both?

16 A I was working there.

17 Q And what did you do there?

18 A I was director of foundation
19 relations, and it was a fund-raising position.

20 Q And after you left Georgia Tech,
21 what was your next position?

22 A University of Georgia. I worked at
23 University of Georgia from 1989 to 1991.

24 Q And what did you do at the
25 University of Georgia?

1 A I directed programs in private
2 fund-raising.

3 Q And after you left the University of
4 Georgia in 1991, what was your next position?

5 A My next position was at Oglethorpe
6 University here in Atlanta.

7 Q What did you do there?

8 A I was associate vice president for
9 development.

10 Q And how long were you there at
11 Oglethorpe?

12 A I was there until 1990 -- I was
13 there for eight years.

14 Q So we're up to about 2000?

15 A We're at 1999.

16 Q 1999. And what was your next
17 position?

18 A Morris Brown College, which is a
19 historically black college and university in
20 Atlanta.

21 Q And what did you do there?

22 A I was vice president for
23 development.

24 Q And are you still there?

25 A No. After three years, I went to

1 work at Morehouse School of Medicine, which is
2 a historically black academic health center.

3 Q And are you still at Morehouse?

4 A I am.

5 Q Okay.

6 A I'm there now part-time; however, I
7 was there for 12 years full-time.

8 Q And when you were there full-time
9 for 12 years, what was your role?

10 A Associate vice president for private
11 fund-raising.

12 Q When did you go part-time?

13 A Three years ago.

14 Q And has your role been the same or
15 changed?

16 A It's the same. Excuse me, ma'am.

17 Q Yes.

18 A I had supervised a staff as
19 associate vice president. Let me clarify. I
20 no longer supervise a staff, but my work
21 remains very much the same.

22 Q In about 1960, you were living in
23 Marietta; is that right?

24 A Correct.

25 Q And then did you move to DeKalb when

1 you went to work --

2 A Yes.

3 Q -- there?

4 A To get closer.

5 Q And after you left the DeKalb County
6 School District, where did you move to?

7 A Atlanta, the city of.

8 Q And what year was that?

9 A 1968.

10 Q And how long did you live in
11 Atlanta?

12 A 16 years.

13 Q And where did you move next?

14 A Gwinnett County.

15 Q And what year was that?

16 A 1992.

17 Q And did you move to the area where
18 you're currently representing District 3?

19 A Yes, we -- yes.

20 Q Are you still living in the same --

21 A Same house.

22 Q -- house? And what's the address
23 there?

24 A 4516 Ridgeway Drive, Northwest,
25 Duluth, Georgia 30097.

1 Q When is the first time that you ran
2 for any public office?

3 A 1996.

4 Q And that was for the Gwinnett County
5 Public --

6 A Yes, ma'am.

7 Q -- School District? What inspired
8 you to run for the School Board at that time?

9 A There were, there were individuals
10 in the community who recruited, first, my
11 husband, and then he, he directed them to me.

12 Q Did your husband ever serve on the
13 School Board?

14 A No.

15 Q Who were the individuals that
16 contacted your husband?

17 A I don't recall their names.

18 Q Do you recall any of them?

19 A Pardon?

20 Q Any of them?

21 A No.

22 Q Were they associated with any
23 organization?

24 A No. They were citizens of the
25 community.

1 Q Do you know why they approached your
2 husband about running for the School Board?

3 A Approached him?

4 Q Why?

5 A Why. They met him and they thought
6 he had the qualities to be a good School Board
7 member.

8 Q Do you recall how many individuals
9 there were?

10 A I don't.

11 Q And your husband directed those
12 individuals to you?

13 A Correct.

14 Q And that was --

15 A Or, or the inquiry to me.

16 Q Was the inquiry in person or by
17 letter, or what form was the inquiry?

18 A I would just say -- would you ask
19 your question again, please?

20 Q You said the inquiry came to you
21 from your husband.

22 A Yes.

23 Q What format was the inquiry in? Did
24 he verbalize it?

25 A Yes, yes. Forgive me. I want to be

1 sure to answer your question.

2 Q And then after you heard there were
3 individuals through your husband who were
4 recruiting for a School Board member --

5 A Yes, ma'am.

6 Q -- what did you do next after you
7 heard about that?

8 A I began to investigate.

9 Q And what did you do specifically?

10 A To see what amount of time would be
11 required.

12 Q And what did you find out about
13 that?

14 A That there appeared to be a need for
15 someone with my background, and there were
16 people in the community who agreed.

17 Q And what did your investigation
18 consist of?

19 A Finding out how many times the
20 School Board met, what hours, finding out more
21 about the District, how many schools, finding
22 out what the role of the School Board member
23 was.

24 Q Did -- strike that.

25 You mentioned you had twins at one

1 point.

2 A Yes, ma'am.

3 Q Did the twins attend Gwinnett County
4 Public Schools?

5 A No, they didn't.

6 Q Did you have any other children?

7 A We have an older daughter.

8 Q Okay. So she did not also attend
9 Gwinnett?

10 A That's correct. Correct.

11 Q All right. And when you did some
12 investigation about the schools, what did that
13 involve?

14 A To find out what number of schools
15 there were. At the time, there were nine.

16 Q Nine in District 3?

17 A Yes, ma'am.

18 Q And did you do any kind of
19 investigation about why these individuals were
20 looking for a new School Board member?

21 A No. The investigation I did was
22 based primarily on newspaper articles.

23 Q Okay. What did the newspaper
24 articles discuss?

25 A At that time, there was concern

1 about something called QBE, quality-basic
2 education.

3 Q And what is that?

4 A The -- a form of a curriculum.

5 Q And what was the concern about that
6 curriculum?

7 A That it didn't provide -- it wasn't
8 robust enough.

9 Q Is that also referred to as
10 outcome-based education?

11 A Yes. That is correct. I misspoke.

12 Q And what newspaper articles --
13 strike that.

14 What newspapers did you look at
15 to --

16 A The Gwinnett Daily Post.

17 Q And did you talk to anybody about
18 the outcome-based education curriculum during
19 your investigation?

20 A I attempted to find out more about
21 it.

22 Q What did you do in that regard?

23 A I studied about it. I -- I studied
24 about it.

25 Q Did you ever talk to anyone about

1 it?

2 A No. In some of the community
3 meetings that I was attending, I heard about
4 it. It was a topic --

5 Q What were --

6 A -- of the meetings.

7 Q I'm sorry. What were the community
8 meetings?

9 A They were gatherings of people at
10 libraries, for the most part.

11 Q Who sponsored those meetings?

12 A The community members.

13 Q Were they part of a political party
14 organization?

15 A No, no.

16 Q Did you know any of the community
17 members attending those meetings?

18 A No. I was moving into the county
19 for the most part.

20 Q Were you a member of the Gwinnett
21 County Republican Party at that time?

22 A I was.

23 Q Did you talk to any of the Gwinnett
24 County Republican Party members about the
25 investigation you were conducting --

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A I don't recall.

Q -- into the School Board?

A I don't recall.

Q Did you talk to any teachers about the outcome-based education --

A I don't recall.

Q Let me finish.

A I'm so sorry, Ms. Houk.

Q Did you talk to any of the teachers about the outcome-based education curriculum?

A I don't recall.

Q Was there an incumbent School Board member in District 3 at the time you started to contemplate running for the Board?

A No. It was an open seat.

Q Did you then decide to actually run for that seat?

A I did.

Q Do you remember approximately when that was that you made that decision?

A It would have been certainly by the deadline of the primary. I'm sorry. Certainly by the deadline of the qualifications.

Q Were the elections at that time for the School Board still in May or June, or were

1 they in November?

2 A Well, they would be --

3 Q For the primaries.

4 A For the primary? No. They would
5 have been much earlier, March or May. I don't
6 recall.

7 Q Did you have a campaign staff for
8 that election?

9 A I didn't have a staff. I had a
10 volunteer group.

11 Q And how did you organize a volunteer
12 group for your campaign?

13 A I organized based on people I'd met
14 in our neighborhood.

15 Q Aside from the outcome-based
16 education curriculum issue you mentioned, were
17 there any other issues or concerns you had that
18 sparked your desire to run for the School Board
19 at that time?

20 A No.

21 Q Do you know if -- strike that.

22 Who was the School Board member that
23 had the District 3 seat who left that position?

24 A Julie Duke.

25 Q Do you know what her position was on

1 outcome-based education?

2 A I do not.

3 Q Do you know why she left that seat?

4 A I do not.

5 Q Did she leave the seat before the
6 end of her term?

7 A No.

8 Q She just announced that she wasn't
9 going to run again?

10 A Correct.

11 Q How many volunteers did you have for
12 that first campaign?

13 A I'd say ten.

14 Q Were any of those individuals
15 minority persons?

16 A I don't recall.

17 Q Were they Republicans?

18 A I don't recall.

19 Q Did the Gwinnett County Republican
20 Party support your campaign?

21 A No.

22 Q Did they not support it, I mean,
23 actively say they weren't in favor of your
24 campaign?

25 A No. Because it was an open seat,

1 they were not taking sides.

2 Q Did you do any fund-raising for that
3 campaign?

4 A Yes.

5 Q And what was the fund-raising
6 activity you engaged in?

7 A Grassroots.

8 Q And what does that mean?

9 A Contacting people to see would you
10 contribute \$25, \$50, \$100.

11 Q And how did you make those contacts?

12 A Primarily by direct mail.

13 Q Did you have a focus group for your
14 direct mailings?

15 A No.

16 Q Did you send them districtwide?

17 A In District 3.

18 Q Yes.

19 A Yes.

20 Q Do you recall approximately how much
21 money you raised for that campaign?

22 A I would say 8 to \$10,000.

23 Q What types of campaign activities
24 did you engage in for that particular election?

25 A I had, had flyers, posters, yard

1 signs. I subscribed to a video that was aired
2 at important times for viewership.

3 Q And was that a contested election?

4 A Yes, it was.

5 Q Who -- did you have one opponent or
6 more?

7 A One.

8 Q And who was your opponent in the
9 first election?

10 A His name was Jim Nelems.

11 Q Can you spell the last name?

12 A Surely. N-E-L-E-M-S.

13 Q And was he a Republican?

14 A Yes. This was contested in the
15 primary.

16 Q Do you recall his race?

17 A Caucasian.

18 Q Did you have a campaign manager?

19 A My husband.

20 Q And I take it you were successful in
21 defeating Mr. Nelems --

22 A Yes, ma'am.

23 Q -- in the primary? So did you have
24 a Democratic --

25 A No.

1 Q -- opponent for the general?

2 A No.

3 Q Do you recall what the margin was of
4 your election against Mr. Nelems?

5 A 67 percent.

6 Q Was Mr. Nelems in favor of the
7 outcome-based --

8 A I don't recall.

9 Q -- curriculum? How did your
10 campaign platform differ from Mr. Nelems?

11 A Mr. Nelems talked about being a
12 long-term resident of Gwinnett, and at the
13 time, I had only been in Gwinnett four years.

14 Q So was that the essential
15 distinction between your campaigns, that he was
16 running as an old-time Gwinnetter --

17 A It had --

18 Q -- and you were a new person?

19 A -- a lot to do with the
20 communication, yes.

21 Q Had Mr. Nelems ever been elected to
22 office prior to that time?

23 A No.

24 Q So you were both first-time
25 candidates?

1 A Yes, ma'am.

2 Q At the time of the first campaign,
3 do you recall approximately what the racial
4 demographics of District 3 were?

5 A I don't.

6 Q Were there any minority people
7 living in District 3 at that time?

8 A Yes, there were.

9 Q Do you know if it was 10 percent, 20
10 percent, 30 percent of the population?

11 A I don't.

12 Q Do you know if any minority persons
13 voted for you or said they voted for you?

14 A Yes, I do.

15 Q And what did you know about that?

16 A That they voted for me.

17 Q How did you find out that they had?

18 A That they endorsed my campaign.

19 Q Who endorsed your campaign who was a
20 minority person?

21 A Mr. Craig Newton.

22 Q And who is Craig Newton?

23 A He is now the mayor of Norcross --
24 well, I'm sorry. He will be the mayor of
25 Norcross when the election takes place.

1 Q And he'll be the first black mayor
2 of Norcross?

3 A Correct.

4 Q Do you stay in contact with
5 Mr. Newton?

6 A Yes.

7 Q Did anyone else endorse your
8 campaign?

9 A The mayor of Norcross, Lillian Webb.
10 And, Ms. Houk, let me clarify. That was for my
11 second campaign.

12 Q So Mr. Newton endorsed your second
13 campaign?

14 A And Mrs., Mrs. Webb, so forgive me.

15 Q Did you have any endorsements in the
16 first campaign?

17 A I don't recall.

18 Q And the Board of Education terms are
19 four years; correct?

20 A Yes, ma'am.

21 Q And when did you run your next
22 campaign, what year was it?

23 A 2000.

24 Q And in 2000, did you have a campaign
25 manager?

1 A My husband.

2 Q And did you have volunteers?

3 A Yes.

4 Q Approximately how many?

5 A I'd say 20.

6 Q Did you have any minority persons
7 volunteer for your campaign?

8 A Yes, I did.

9 Q Who were they?

10 A Mr. L.C. Johnson.

11 Q And who is Mr. L.C. Johnson?

12 A He's a community leader in Gwinnett.
13 Well, in Norcross especially.

14 Q Did you have any other minority
15 persons volunteering for your second campaign?

16 A Yes. Mr. Jose Perez.

17 Q Who is Mr. Perez?

18 A He has been our seventh district
19 member of the State Board of Education.

20 Q Did you have any other minority
21 volunteers for the second campaign?

22 A I don't recall.

23 Q And did you -- was that a contested
24 election?

25 A Yes, it was.

1 Q And how many opponents did you have?
2 A One opponent.
3 Q Who was that?
4 A Kevin Jennings, a woman.
5 Q Was she a -- strike that.
6 Was she a Republican?
7 A Yes.
8 Q So this was a contested primary?
9 A It was.
10 Q Did you do fund-raising for the
11 second campaign?
12 A Yes, we did.
13 Q And approximately how much money did
14 you raise?
15 A I would say approximately \$20,000.
16 Q Were these grassroots fund-raising
17 activities?
18 A Yes, ma'am.
19 Q Did you ever solicit funds from any
20 institutions or organizations?
21 A No.
22 Q Did the -- strike that.
23 Did you ever seek the endorsement of
24 the Chamber of Commerce for that election?
25 A I did not.

1 Q And what was the race of your
2 opponent in that election?

3 A Caucasian.

4 Q Did your campaign feature the same
5 kinds of activities as your first election,
6 such as putting up flyers and posters and mail,
7 direct mailings, to people?

8 A Yes.

9 Q Oh, and going back to your first
10 election campaign, you mentioned a video that
11 was produced?

12 A Yes.

13 Q Do you still have that video?

14 A I, I may, but I don't know where it
15 is.

16 Q Was that broadcast on television?

17 A It was.

18 Q And did you essentially describe
19 what your point of view was on issues related
20 to the --

21 A Yes.

22 Q -- School Board? And then you were
23 successful in your campaign against
24 Ms. Jennings?

25 A Yes, ma'am.

1 Q And you didn't have a contested
2 election --

3 A No.

4 Q -- for the general?

5 A Correct.

6 Q Was your next election then in 2004?

7 A Yes, ma'am.

8 Q And was that a contested election?

9 A It was.

10 Q And who was your -- did you have one
11 or more opponents?

12 A One opponent. His name was Norman
13 Crawford.

14 Q And what race was Norman Crawford?

15 A Caucasian.

16 Q Was he a Republican?

17 A Yes.

18 Q So it was a contested primary?

19 A Yes, it was. No. Excuse me. He
20 was a Democrat. So it went all the way through
21 to November.

22 Q And you didn't have a Republican
23 challenger?

24 A No.

25 Q Do you recall how your platform for

1 your campaign differed from that of
2 Mr. Crawford?

3 A No. He was not a visible opponent.

4 Q What do you mean by that?

5 A I don't know that he communicated
6 what his platform was.

7 Q Did you ever attend any candidate
8 forums with Mr. Crawford --

9 A No.

10 Q -- where you presented your opposing
11 views?

12 A No.

13 Q Do you know if he was a first-time
14 candidate?

15 A I don't know.

16 Q And in that campaign, what were your
17 major issues or themes of your campaign?

18 A Well, to make certain that our
19 community understood the value of what we
20 called the Gateway testing as an assessment
21 measure.

22 Q What is the Gateway testing?

23 A The School System developed it to
24 measure how successful the students are in
25 their curriculum called Academic Knowledge and

1 Skills.

2 Q Was this a tool that was developed
3 specifically by the Gwinnett County School
4 District?

5 A Yes, ma'am.

6 Q Was it controversial in some way in
7 the community?

8 A It was.

9 Q Why was that?

10 A There was a movement, pretty much
11 I'd call it a national movement, against
12 testing.

13 Q And why did you think the Gateway
14 testing was a good thing for the School
15 District?

16 A Because we had developed our own
17 curriculum and we wanted a way to measure the
18 success of that curriculum with our students.

19 Q Is that Gateway testing process
20 still in practice?

21 A Yes, it is.

22 Q Let me go back for a minute. When
23 you were elected to the School Board for your
24 second term in 2000, that was when there was a
25 decennial census; correct?

1 A Yes, ma'am.

2 Q So you were around at least in the
3 second term of your status as a School Board
4 member for the redistricting of the School
5 Board in 2000?

6 A That's right.

7 Q Can you describe to me what your
8 role was with respect to the 2000
9 redistricting?

10 A I had no role.

11 Q None at all?

12 A No.

13 Q Did you ever review any maps?

14 A Nope, not that I recall.

15 Q Did you talk to any school
16 administrators --

17 A No.

18 Q -- about the redistricting?

19 A No.

20 Q Were you aware of proposals that
21 were being made in the legislature about the
22 redistricting?

23 A No.

24 Q Did you have any concerns about how
25 your district could be changed in the

1 redistricting?

2 A No.

3 Q Did you have any preferences about
4 how your district could change in the
5 redistricting?

6 A No.

7 Q What did you understand was required
8 in the redistricting, why that process was
9 occurring after the census?

10 A Especially in our county, an influx
11 of new citizens, and in our schools, increased
12 numbers of students and increased number of
13 schools.

14 Q And when I'm talking about
15 redistricting, unless I say otherwise, I'm
16 talking about voting district redistricting
17 rather than school attendance redistricting.

18 A All right.

19 Q So does that change any of your
20 answers?

21 A Let me go back. Would you repeat
22 that?

23 Q Sure. Let me just go back. Talking
24 about voting district redistricting, your
25 School Board member district boundaries, did

1 you talk to anyone about --

2 A No.

3 Q -- that redistricting?

4 A No.

5 Q Did you read anything relating to
6 that redistricting?

7 A I don't recall, but no.

8 Q Did you speak to any legislators
9 about --

10 A No.

11 Q -- the redistricting? Did you have
12 any concerns about the changes in your school
13 boundary or your school district boundary
14 lines?

15 A No.

16 Q Was it your impression that the
17 minority population in District 3 had increased
18 since you joined the School Board in 1996?

19 A Yes.

20 Q At that time, between 1996 and 2000,
21 were there particular areas of District 3 where
22 minority population was increasing?

23 A I don't recall.

24 Q Were there particular schools that
25 were affected by minority families moving into

1 the district?

2 A Yes.

3 Q What schools were those?

4 A I would recall Peachtree Elementary.
5 This is '96 to 2000?

6 Q Yes.

7 A Correct.

8 Q That was the primary school that was
9 affected by --

10 A Correct.

11 Q -- the incoming minority population?

12 A Correct.

13 Q And would you say that there was an
14 increase primarily in Latino families moving
15 into the district or people moving into the
16 district versus black people?

17 A I don't recall.

18 Q In your second term when you ran for
19 election in 2000, you were running as a
20 Republican?

21 A Yes, ma'am.

22 Q Did you ever attend any Gwinnett
23 County Republican Party meetings about
24 redistricting?

25 A No.

1 Q Prior to 2000, did you ever study
2 redistricting in any way?

3 A No.

4 Q Did you know anything about the
5 principle one person/one vote in redistricting
6 at that time?

7 A I don't recall.

8 Q How did -- strike that.

9 Did you ever find out at some point
10 that any portion of your District 3 had been
11 changed in terms of the boundary lines as a
12 result of that redistricting process following
13 the 2000 census?

14 A At what time period?

15 Q At any point, did you find out
16 eventually that any of the lines of your school
17 district boundaries had been changed as a
18 result of that redistricting process after the
19 2000 census?

20 A Yes.

21 Q And how did you find out about that?

22 A Well, they were voted on by the
23 General Assembly.

24 Q And was that the first time you knew
25 about it?

1 A That's my, that's my best
2 understanding.

3 Q How did you find out that the
4 General Assembly had voted on it?

5 A Well, that was the law.

6 Q Well, I'm asking how you found out
7 about it.

8 A Well, I don't recall.

9 Q Did you ever see a copy of your
10 revised map following that redistricting?

11 A Is this after the law was passed?

12 Q At any time.

13 A No.

14 Q So after the law was passed, you
15 still didn't see the changed district?

16 A No. I did see -- I mean, it was all
17 public, public information.

18 Q And how did you access that public
19 information?

20 A I don't recall.

21 Q Did you ever discuss the
22 redistricting after it occurred with any of the
23 other School Board members?

24 A No.

25 Q Did you ever discuss the

1 redistricting with anyone after it occurred?

2 A I don't recall.

3 Q Were you pleased with the
4 redistricting, what happened with respect to
5 District 3?

6 A I don't know.

7 Q So your next campaign for the School
8 Board would have been in 2008?

9 A Yes, ma'am.

10 Q And was that a contested election?

11 A Yes, it was.

12 Q Was it -- was there a Republican
13 primary?

14 A No.

15 Q So you ran against a Democrat in the
16 general?

17 A I did.

18 Q And who was your opponent?

19 A Jane Hendrix.

20 Q Do you know how her last name is
21 spelled?

22 A Certainly. H-E-N-D-R-I-X.

23 Q And what is Ms. Hendrix's race?

24 A Caucasian.

25 Q And did you raise funds for that

1 campaign?

2 A Yes, I did.

3 Q Approximately, how many -- strike
4 that.

5 Approximately, how much did you
6 raise for that campaign?

7 A I would say 20, \$20,000.

8 Q Were you still focused in your
9 fund-raising efforts on grassroots donors --

10 A Oh, always.

11 Q -- or did you expand it to
12 institutions or organizations?

13 A No.

14 Q Did you have any endorsements in
15 that campaign?

16 A I did.

17 Q From whom?

18 A I would have Bishop William Sheals,
19 Mayor Webb, and I -- by that time, I believe I
20 had a website up with those endorsements on the
21 website.

22 Q And who is William Sheals?

23 A He's the pastor of Hopewell Baptist
24 Church here in, here in Gwinnett County, in
25 Norcross.

1 Q And who is Mayor Webb?

2 A She was the mayor of Norcross.
3 She's deceased.

4 Q Were either of those individuals
5 minority individuals?

6 A Bishop Sheals.

7 Q Is he African-American?

8 A Correct. And also Jose Perez,
9 Cuban.

10 Q Is Mr. Perez a Republican to your
11 knowledge?

12 A Yes, he is.

13 Q What about Mr. Sheals?

14 A I don't know.

15 Q Is Mayor Webb a Republican?

16 A Yes. And there were others, but
17 those are the ones that come to my mind.

18 Q Did you have any media endorsements
19 from a newspaper?

20 A No.

21 Q What were your campaign themes or
22 platform for the 2008 campaign?

23 A That all children can learn.

24 Q What did that mean?

25 A That there is no child in the

1 Gwinnett County Public School System who cannot
2 learn and will not be afforded that
3 opportunity. Safety and security in our
4 schools. Parents are the first teachers of
5 children.

6 Q How did your platform differ from
7 Ms. Hendrix's platform?

8 A Ms. Hendrix was a kindergarten
9 teacher in DeKalb County. That's all I know
10 about her.

11 Q Did you ever attend candidate forums
12 with Ms. Hendrix?

13 A No.

14 Q Were your campaign activities
15 similar to your prior campaigns?

16 A They were. They began at this time
17 to expand as the district is getting larger,
18 more outreach.

19 Q Can you describe how that expanded
20 approach took place in, in the 2008 campaign?

21 A Making certain that our campaign
22 committee had representatives of many segments:
23 students, parents with no children in the
24 schools.

25 Q About how many volunteers did you

1 have for the 2008 campaign?

2 A I would say 20, certainly.

3 Q Did you have minority individuals on
4 your campaign --

5 A Yes.

6 Q -- volunteers? Who were they?

7 A Mr. L.C. Johnson again, Jose Perez,
8 and there would be others.

9 Q Did the Gwinnett County Republican
10 Party endorse you in that campaign?

11 A I, I had no opponent.

12 Q Did they take a position on your
13 campaign?

14 A No. Well, yes. I'm confident they
15 did, that they supported me. I had no
16 opponent.

17 Q How did they support you?

18 A No money.

19 Q Did they support you with staff?

20 A No.

21 Q Or flyers or help with --

22 A No.

23 Q -- any kind of your campaign --

24 A No.

25 Q -- activities?

1 A They have a phone bank. I went over
2 and volunteered on the phone bank. But the
3 greater effort was for other candidates.

4 Q Okay. And what was the margin in
5 terms of your lead over Ms. Hendrix in the
6 general election?

7 A 60.

8 Q So your next campaign was in 2012?

9 A Yes, ma'am.

10 Q And by that point, there was another
11 census in 2010?

12 A That's correct.

13 Q Do you recall when anyone associated
14 with the Gwinnett County Public School District
15 began looking into -- and again I'm talking
16 about voting district -- redistricting after
17 the 2010 --

18 A Not the school census but the voting
19 district?

20 Q That's correct.

21 A Thank you.

22 Q After the 2010 census, when is the
23 first time you learned anyone associated with
24 the Gwinnett County Public School District was
25 looking into the voting district redistricting?

1 A I didn't learn.

2 Q And after the 2010 census, what was
3 your role with respect to the redistricting of
4 the School Board member districts?

5 A I had no role.

6 Q Prior to the final vote on the
7 redistricting plan by the state legislature,
8 did you ever review any documents at all
9 relating to the voting district --

10 A No.

11 Q Let me finish my question.

12 A Forgive me. I'm so sorry.

13 Q Before the vote in the General
14 Assembly on the final approval of the
15 redistricting plan, did you review any
16 documents at all relating to the voting
17 district redistricting?

18 A No.

19 Q Did you review any maps?

20 A No.

21 Q Did you review any census data?

22 A No.

23 Q Did you review any breakdown in
24 terms of racial demographics?

25 A No.

1 Q Did you review any partisan data?

2 A Democrat or Republican?

3 Q Any kind of partisan data with
4 respect to the voting districts.

5 A No.

6 Q Or portions of the voting districts?

7 A No.

8 Q Did you talk to anybody at all about
9 the redistricting process that began after the
10 2010 census before the Georgia legislator
11 vote -- legislature voted on the final --

12 A No.

13 Q -- plan? You never talked to
14 Superintendent Wilbanks about voting district
15 redistricting before the legislator --

16 A No.

17 Q -- legislature voted on the final
18 plan?

19 A Forgive me. No.

20 Q Did you ever talk to anyone in the
21 Gwinnett County Public School District planning
22 department about redistricting --

23 A No.

24 Q -- before the -- let me finish.

25 A I'm sorry.

1 Q -- before the state legislature
2 voted on the final plan?

3 A No.

4 Q Do you know who Greg Stanfield is?

5 A I do.

6 Q And who is he?

7 A He's the director of our planning
8 department.

9 Q Prior to the legislature voting on
10 the final redistricting plan in 2011, did you
11 ever learn that Greg Stanfield had been
12 drafting any proposed redistricting plans --

13 A No.

14 Q -- for the School Board?

15 A No.

16 Q What was Mr. Stanfield's role with
17 respect to redistricting in 2011?

18 A I don't know.

19 Q If you wanted to find out what his
20 role was, who would you ask?

21 A I would ask the superintendent.

22 Q Mr. Wilbanks?

23 A Correct.

24 Q Did you know David McCleskey in
25 2011?

1 A Yes, ma'am.

2 Q And who is David McCleskey?

3 A He is our liaison with the General
4 Assembly.

5 Q What are -- strike that.

6 In 2011, what were his duties and
7 responsibilities as the liaison with the
8 General Assembly?

9 A I don't know.

10 Q What is meant by the term liaison in
11 that sense --

12 A A link.

13 Q -- with respect to his position?

14 A A link.

15 Q A link?

16 A That would be my best understanding.

17 Q Does he essentially serve in the
18 role as an advocate on behalf of the Board with
19 the legislature?

20 A I don't know.

21 Q Or in the role of a lobbyist?

22 A I don't know.

23 Q What were Mr. McCleskey's duties and
24 responsibilities with respect to School Board
25 redistricting in 2011?

1 A I don't know.

2 Q Who would you ask to find out what
3 they were?

4 A The superintendent.

5 Q Did you ever speak to David
6 McCleskey about School Board district
7 redistricting in 2011 before the state
8 legislature voted on the final --

9 A No.

10 Q -- plan? Did you ever talk to him
11 at any point before the legislature voted on a
12 final plan at all about redistricting?

13 A No.

14 Q And I'm saying this in the broadest
15 sense. Prior to the legislature voting on the
16 final plan in 2011, did you ever on any
17 occasion talk to David McCleskey about School
18 Board redistricting?

19 A No.

20 Q And the same question with respect
21 to Mr. Stanfield. Before the state legislature
22 voted on the plan in 2011, did you ever talk to
23 him in any way about redistricting?

24 A No.

25 Q To your knowledge does anybody --

1 strike that.

2 With respect to Superintendent
3 Wilbanks, what were his duties and
4 responsibilities with respect to School Board
5 redistricting in 2011?

6 A I don't know.

7 Q Did you ever talk to Superintendent
8 Wilbanks at any time before the legislature
9 voted on the final plan in 2011 about
10 redistricting at all?

11 A No.

12 Q Never in the whole time you were on
13 the School Board did you talk to him before the
14 legislature voted --

15 A Before the legislation?

16 Q -- in 2011 about --

17 A No.

18 Q -- redistricting? To your
19 knowledge, did the Board collectively ever give
20 Superintendent Wilbanks any directives with
21 respect to School Board redistricting?

22 A No.

23 Q Are you saying it didn't happen or
24 you don't know?

25 A If you would be so kind to repeat

1 the question.

2 Q I sure will. At any time, did the
3 School Board collectively give any directions
4 to Superintendent Wilbanks to do anything in
5 connection with School Board redistricting?

6 A And when you say "collectively,"
7 that we voted on it?

8 Q Well, as a group, whether you voted
9 on it or you told them -- told him collectively
10 to do it, either way.

11 A There was a request to keep School
12 Board clusters whole, and by that, I mean not
13 to have two board members representing one
14 cluster. That, that was not acted upon by the
15 General Assembly. That would be the only thing
16 I could think of.

17 Q Who made that request?

18 A I don't know.

19 Q Was that a -- are you saying that
20 somebody came to the Board with that request
21 and then that was forwarded on to Mr. Wilbanks?
22 I'm trying to understand --

23 A Right.

24 Q -- what you meant by that.

25 A I honestly don't know who, who would

1 have made a request or how that information got
2 communicated.

3 Q When did you first learn that there
4 had been such a request?

5 A I don't know.

6 Q Was it at a Board meeting?

7 A No.

8 Q Was it from another Board member?

9 A No.

10 Q Was it from one of the
11 administrators of the School District?

12 A No.

13 Q Was it a citizen?

14 A No.

15 Q You don't have any idea --

16 A No.

17 Q -- who it was? Do you know why the
18 request was made to keep the school clusters
19 together?

20 A No, I don't.

21 Q And what do you mean by school
22 clusters? What does that refer to?

23 A That would be the number of
24 elementary schools feeding into the number of
25 middle schools feeding into the single high

1 school that the cluster is named for.

2 Q Were you in favor of keeping the
3 school clusters together?

4 A I didn't have an opinion.

5 Q What would be the advantages of
6 keeping the school clusters together, in your
7 mind?

8 A Predictability for the parents as to
9 where the students would continue their
10 education in Gwinnett County.

11 Q Do you know how it would be
12 determined, in the concept of drawing
13 redistricting maps, how the clusters would be
14 kept together?

15 A No, I don't.

16 Q And how did you find out that the
17 legislature did not act on that request?

18 A After the vote was taken.

19 Q And how did you find out about it
20 then?

21 A That the School Board members still
22 did share clusters.

23 Q Did anyone tell you that the
24 legislature did not act on that request?

25 A No. It was, it was evident they had

1 not.

2 Q Evident from the final maps?

3 A Evident from the assignment of
4 School Board members to their clusters.

5 Q Did you ever see the final map of
6 the redistricting of District 3 following the
7 2011 vote by the legislature?

8 A Yes, I'm sure I did.

9 Q When did you first see the map?

10 A I don't recall.

11 Q Did you ever see any proposed maps
12 before you saw the final one that was enacted
13 by the legislature?

14 A No.

15 Q In the 2010 -- strike that.

16 Following the 2010 census, during
17 the redistricting process that led to the
18 legislature's adoption of the final plan in
19 2011, did you ever express any opinions about
20 how the Board District 3 lines should be drawn?

21 A No.

22 Q Between the 2000 census and the 2010
23 census, did the minority population of
24 District 3 continue to grow?

25 A Yes.

1 Q Between 2000 and 2010, would it be
2 fair to say that most minority persons in
3 Gwinnett County were -- had a partisan
4 preference for the Democratic Party?

5 A Most?

6 Q Yes.

7 A I think it would tend to be that
8 way.

9 Q And would it also be fair to say
10 that --

11 A Oh, excuse me. Minority? Tell me
12 how you define "minority."

13 Q African-American, Latino,
14 Asian-American --

15 A Thank you.

16 Q -- Native American, Alaskan Native,
17 Pacific Islander.

18 A Right. If you'll ask me the
19 question again.

20 Q With those minority groups in mind,
21 would it be fair to say that they tended to
22 favor the Democratic Party over the Republican
23 Party in Gwinnett County?

24 A I would say for African-Americans,
25 there is a tendency to vote Democrat. For

1 Latino, that is less clear. And for
2 Asian-Americans, no.

3 Q And what is your conclusion based
4 upon with respect to Asian-Americans?

5 A From my own experience with Asian,
6 Asians in our District 3.

7 Q And what has that experience been?

8 A The voting in the 2012 election.
9 And so the point I'm making, I find, I find the
10 three minority groups tend to -- the three
11 minority groups cannot all be linked into one
12 group.

13 Q Why not?

14 A Because of the voting interests and
15 the voting patterns.

16 Q And what voting patterns are you
17 referring to?

18 A I'm referring to the 2012 election.
19 That would be it.

20 Q And what specifically in the 2012
21 election makes you believe that Asian-Americans
22 do not tend to vote Democratic --

23 A Right.

24 Q -- in District 3?

25 A Tend to vote in Gwinnett County.

1 Q Gwinnett County. Sorry.

2 A Right. A small number of Asian and
3 Hispanic voters who are registered to vote. A
4 much larger number of African-Americans are
5 registered to vote.

6 Q And did you review election data to
7 make that conclusion?

8 A Did I review election data for what?

9 Q To reach your conclusion of --

10 A For what?

11 Q -- the voting patterns --

12 A From what election?

13 Q -- you just testified to. 2012.

14 A This would have been from 2012 for
15 the 2016 election.

16 Q So you reviewed voting data as part
17 of your research running up to the 2016
18 campaign?

19 A Yes, ma'am.

20 Q Have you re -- have you reviewed any
21 of the expert reports that have been prepared
22 in this litigation?

23 A No.

24 Q Prior to your deposition today, have
25 you reviewed any documents to prepare for your

1 deposition?

2 A Any documents?

3 Q Any, yes.

4 A Well, I've looked at newspaper
5 articles.

6 Q What else did you review to prepare
7 for your deposition today?

8 A Campaign materials. I think that
9 would be it.

10 Q Did you review any of the litigation
11 documents?

12 A No.

13 Q Did you ever review the School
14 Board's response to Plaintiff's first set of
15 interrogatories?

16 A Yes, I did.

17 Q When was that?

18 A The interrogatory, about a week ago,
19 maybe a little bit more.

20 Q A week ago or a little bit longer
21 than that?

22 A Uh-huh (affirmative).

23 Q Yes?

24 A Yes, please. I'm sorry.

25 Q Would you say it was within the last

1 month?

2 A Yes.

3 Q And that was the first time you
4 reviewed the School Board's response --

5 A Correct.

6 Q -- to the interrogatories?

7 A Correct.

8 Q Did you supply any of the
9 information that's contained in those
10 responses?

11 A Our School Board attorney queried
12 us.

13 Q And is any of the information that
14 you supplied contained in the interrogatory
15 responses?

16 A Yes.

17 Q What is that?

18 A Excuse me. I'd have to go back and
19 review it. But it relates to what the School
20 Board attorneys requested.

21 Q The marked exhibits are in front of
22 you. We're just -- as background, we're
23 continuing -- the book volume that's before
24 you are the exhibits that were marked
25 Dr. McClure's deposition.

1 A Oh, okay.

2 Q Then the next pile to the right in
3 front of you are documents that were marked at
4 Ms. Radloff's deposition and at -- who did we
5 depose yesterday?

6 MR. COFFMAN: Mr. Seckinger.

7 Q Mr. Seckinger, that's right. So
8 those, they're sequential, so the book starts
9 with the first number, and then it continues
10 into that loose pile over there.

11 A Okay.

12 (Whereupon a document was identified
13 as Plaintiff's Exhibit 6.)

14 Q But if you would turn in the book to
15 Exhibit 6 --

16 A Okay.

17 Q -- that we marked which are the
18 Defendant School District's Response to
19 Plaintiff's First Set of Interrogatories.

20 A Uh-huh (affirmative).

21 Q And just take a look at those for a
22 moment.

23 A Sure. Yeah. It had to do with the
24 campaign.

25 Q Okay. Let me just ask a preliminary

1 question.

2 A Sure.

3 Q You're looking at what's been
4 previously marked as Exhibit 6, and are those
5 the interrogatory responses that you saw within
6 the last month for the first time?

7 A Yes, ma'am.

8 Q And you're directing your attention
9 to a particular page. What page are you
10 looking at?

11 A Page 13.

12 Q And I think you started to tell us
13 that there was information on page 13 that you
14 supplied?

15 A Yes, I did.

16 Q And what was that?

17 A The name of my campaign manager,
18 Michael C. Murphy, and the name of my campaign
19 treasurer, Robert Chapin, for all campaigns
20 since July -- January 1st, 2002.

21 Q Was there any other information
22 contained in the interrogatory responses that
23 you provided?

24 A Not that I can recall.

25 Q When you reviewed the interrogatory

1 responses in the last month, did you see
2 anything in there that you didn't think was
3 accurate?

4 A No.

5 Q I'd like to direct your attention to
6 page 16 of Exhibit 6.

7 A Thank you.

8 Q Specifically starting at the bottom
9 or the middle of the page, interrogatory number
10 nine.

11 A All right. Thank you.

12 Q And that interrogatory asks:
13 "Identify all members of the Gwinnett County
14 Board of Education who participated in or
15 otherwise provided input with respect to the
16 2011 districting plan for the Board of
17 Education referred to in paragraph 75 in the
18 Second Amended Complaint.

19 A Excuse me, ma'am. I'm not following
20 you.

21 Q I'm sorry. Page 16.

22 A Uh-huh (affirmative).

23 Q Interrogatory number nine.

24 A Oh, okay.

25 Q It starts in the middle of the page.

1 A Thank you. I got it.

2 Q And I just read that, but why don't
3 you read it over to yourself.

4 A Sure. I did. Thank you.

5 Q Okay. And the answer was none, and
6 in your mind is that a correct answer to that
7 interrogatory?

8 A That is correct.

9 Q And I'd like to direct your
10 attention to interrogatory number 10 also --

11 A All right.

12 Q -- on page 16. And that
13 interrogatory stated: "Please identify any and
14 all of your members, employees, agents, and
15 consultants who communicated orally, in
16 writing, or in any other medium with employees
17 of the Georgia Legislative & Congressional
18 Reapportionment Office, members of the Georgia
19 General Assembly, or any other third persons or
20 entities concerning matters relevant to the
21 adoption of the current redistricting plan for
22 the Gwinnett County Board of Education."

23 It goes on to state: "Please
24 identify (a) all persons who have knowledge of
25 such facts and (b) all documents that you

1 contend support your response to this
2 interrogatory.

3 And the answer stated, "David
4 McCleskey, Greg Stanfield, attorneys at
5 Thompson Sweeny Kinsinger & Pereira PC.
6 Documents would include the District's
7 illustrative map with the school clusters
8 wholly contained within election districts and
9 the District's 2011 Section 5 submission to the
10 US Department of Justice."

11 In your mind, is that an accurate
12 response to that interrogatory?

13 A It is accurate.

14 Q What do you know about David
15 McCleskey's communications with the Legislative
16 & Congressional Reapportionment Office or the
17 General Assembly?

18 A I don't know anything.

19 Q What do you know about Greg
20 Stanfield's communications with the Georgia
21 Legislative & Congressional Reapportionment
22 Office or the Georgia General Assembly?

23 A I don't know anything.

24 Q What do you know about your
25 attorneys' communications with the Legislative

1 & Congressional Reapportionment Office and the
2 Georgia General Assembly?

3 A I don't know anything.

4 Q Did you ever see any illustrative
5 maps where school clusters were wholly
6 contained within election districts?

7 A No, not that I recall.

8 Q Do you know who would have prepared
9 such maps?

10 A I don't.

11 Q Did you ever review the District's
12 2011 Section 5 submission to the Department of
13 Justice?

14 A No.

15 Q Do you know what that was?

16 A No.

17 THE VIDEOGRAPHER: Five minutes
18 left.

19 MS. HOUK: Okay. I think this
20 probably would be a good time to take a break.
21 Want to take a short break now or the lunch
22 break? What's your pleasure?

23 THE VIDEOGRAPHER: Going off the
24 record?

25 MR. COFFMAN: Oh, sorry.

1 MS. HOUK: We can go off the record.

2 THE VIDEOGRAPHER: Going off the
3 video record at 11:43 a.m.

4 (Proceedings in recess, 11:43 a.m. to
5 11:58 a.m.)

6 THE VIDEOGRAPHER: We're back on the
7 video record. This is the beginning of video
8 file number two. The time is 11:58 a.m.

9 Q Dr. Murphy, you understand you're
10 still under oath?

11 A Yes, ma'am.

12 Q All right. If you wouldn't mind
13 going back to the exhibit book and turning
14 again to Exhibit 6 which were the interrogatory
15 responses.

16 A Yes.

17 Q And specifically, I'd ask you to
18 turn to page 17, and we're going to look at
19 interrogatory number 11.

20 A All right. Thank you.

21 Q And it's kind of long, so why don't
22 you read it to yourself, and then I'll ask you
23 some questions.

24 A Yes, ma'am.

25 Q This interrogatory is, in essence,

1 and you can disagree with me if I'm not
2 accurately summarizing it, is asking for the
3 communications various people had who are
4 identified in the prior interrogatory answer
5 number 10, what the communications were that
6 they had concerning redistricting of the
7 Gwinnett County Board of Education.

8 And there's an objection, and then
9 there's a substantive response that continues
10 on page 18 where it states: "David McCleskey
11 provided a map to members of the local Gwinnett
12 County legislative delegation suggesting that
13 any configuration of Board of Education
14 districts align with the cluster system."

15 Do you see that?

16 A Yes, I do.

17 Q And the answer goes on after that,
18 but I want to focus on that first sentence.
19 Did you ever see a map that David McCleskey
20 provided to the legislative delegation with the
21 suggestion that the clusters in the system be
22 retained together in any way?

23 A No.

24 Q Do you know if in fact any map
25 exists today that shows that?

1 A No.

2 Q When people in the community want to
3 contact you as a board member about any
4 questions or concerns they have, in your
5 experience, how do they go about doing that,
6 the various formats?

7 A I have my School Board card, and
8 that lists my home address and my telephone
9 number. I have a website. People con --
10 people contact me in a variety of community
11 areas: The drug store, Publix, events held at
12 the school, games, those, those kinds of
13 things.

14 Q Do inquiries directed to you come in
15 through the School District offices in any way?
16 Is there a phone number or an email address
17 that people send inquiries to you through?

18 A Thank you. We do have something
19 called My School Board.

20 Q And is that a tool on the School
21 Board's website?

22 A I don't believe so.

23 Q What is My School Board?

24 A The secretary -- I should say the
25 Board coordinator for our School Board has

1 access to that and reminds us of dates,
2 clarifies whether we're going to attend events.
3 Sometimes she passes on emails that might have
4 come our way through the School System.

5 Q So is the My School Board similar to
6 like an internal messaging system among the
7 School Board administrators and --

8 A I believe it, I believe it is.

9 Q And who is the School Board
10 coordinator today?

11 A Ms. Tammi, T-A-M-M-I, Herring,
12 H-E-R-R-I-N-G.

13 Q And do constituents and people in
14 the community sometimes send you written
15 correspondence?

16 A Yes.

17 Q And when that occurs, what do you
18 typically do with that correspondence?

19 A I direct it to the superintendent.

20 Q And how do you do that?

21 A I give him the document.

22 Q And is it your understanding he
23 retains those documents in some manner?

24 A I don't know.

25 Q Are you familiar with any of the

1 state laws concerning record retention by
2 School Board members and bodies?

3 A I'm not currently up to date, but
4 I'm aware.

5 Q Do you know what the Georgia state
6 law is with respect to retention of records
7 relating to precinct boundary changes?

8 A I do not.

9 Q Did you make any attempt to review
10 any of your records and emails and other
11 sources of information to see if you had
12 documents or other materials responsive to the
13 Plaintiff's request for production of documents
14 in this case?

15 A No.

16 Q Did anyone ask you to do that?

17 A No.

18 Q Do you have a personal email address
19 that you use?

20 A I do.

21 Q What is that?

22 A It's marykaymurphy, all lower case,
23 no space, at aol.com.

24 Q Do you ever use that email address
25 for Board of Education business?

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A I do.

Q Do you use any other email addresses for Board of Education business?

A No.

Q Do you have any other personal email addresses?

A For my campaign, there's a Gmail.

Q And what is that?

A It's associated with my campaign website.

Q What's the email -- is it a dedicated email contact at the website?

A Yes. I could give you the --

Q The website address?

A Yeah. I'll give it to you.

Q And what's that address?

A I'm sorry. It's
voteformaryk@gmail.com.

Q And is the vote for, F-O-R?

A Yes, ma'am.

Q And that's Mary Kay, K-A-Y?

A Correct.

Q All one word?

A All one word.

Q And aside from your campaign

1 website, do you have any other websites?

2 A I do. It's a private website where
3 I work.

4 Q At Morehouse?

5 A Right. But I don't use that for
6 School Board business.

7 Q You don't use your Morehouse email
8 address for school business?

9 A No, ma'am.

10 Q Have you ever?

11 A No.

12 Q Do you know if the School District
13 has sent you email to that Morehouse email
14 address?

15 A I'm sure they have, but it's not for
16 School Board business.

17 Q On what occasions has the School
18 Board sent you email at your Morehouse email
19 address?

20 A I couldn't recall.

21 Q And just for the record, we were
22 joined this morning by one of our individual
23 Plaintiffs, Penny Poole, who's present at the
24 deposition.

25 Dr. Murphy, do you know Ms. Poole?

1 A I do.

2 Q How long have you known Ms. Poole?

3 A I would certainly say since 2000.
4 2004, for sure.

5 Q And at one point, Ms. Poole lived in
6 District 3; correct?

7 A Yes.

8 Q Have you had any conflicts with
9 Ms. Poole?

10 A No, not that I'm aware of.

11 Q Do you know Ms. Poole's husband as
12 well?

13 A I do.

14 Q How do you know her husband?

15 A For about 30 years.

16 Q Have you ever had any conflicts with
17 her husband?

18 A Oh, no.

19 Q And in what context have you known
20 Ms. Poole's husband?

21 A He's affiliated with an athletic
22 club.

23 Q Are you also a member of that club?

24 A Yes.

25 Q And during the time you've been on

1 the School Board, you're aware Ms. Poole has
2 attended School Board meetings?

3 A Yes, I am.

4 Q During any of those School Board
5 meetings that you recall, did Ms. Poole do
6 anything that you felt was out of line in any
7 way?

8 A I don't recall.

9 Q During the time you've been on the
10 Gwinnett County Public School Board, has there
11 been any rule or regulation that outlines when
12 speakers will be banned from offering
13 statements during the public portion of the
14 School Board meetings?

15 A Would you be so kind to repeat?

16 Q Sure. While you've been on the
17 School Board, have there been any rules or
18 policies that outline when speakers will be
19 prevented or banned from speaking at School
20 Board meetings?

21 A No.

22 Q To your knowledge, have any persons
23 residing in Gwinnett County been prevented from
24 speaking at any School Board meetings because
25 of anything that Mr. Wilbanks has claimed

1 occurred?

2 A Not to my knowledge.

3 Q And you're aware that Ms. Poole has
4 had children in the Gwinnett County Public
5 School System?

6 A I am.

7 Q Is Simpson Elementary School in
8 District 3?

9 A Yes, it is.

10 Q Is that a majority-minority school,
11 to your recollection?

12 A Majority --

13 Q Minority?

14 A -- being white? Being white?
15 Caucasian?

16 Q Majority-minority person school
17 where the population of the school is primarily
18 minority citizens and students.

19 A Is Simpson?

20 Q Yes.

21 A No.

22 Q What is approximately the racial
23 demographics of the Simpson Elementary School?

24 A I don't know.

25 Q Would it be fair to say it's about

1 95 percent white?

2 A No.

3 Q Is it 90 percent white?

4 A I don't know.

5 Q How far away from it is -- strike
6 that.

7 How far away from the Peachtree High
8 School is Simpson Elementary?

9 A Peachtree is an elementary school.

10 Q I'm sorry. How far are those
11 schools apart from one another?

12 A I, I don't know the exact distance.

13 Q What high school do children attend
14 who go to the Peachtree Elementary School?

15 A Norcross High School.

16 Q And what high school do the children
17 attend who attend Simpson Elementary?

18 A Norcross High School.

19 MS. HOUK: I think we're right at
20 12:15, so you want to take your lunch break
21 now?

22 MR. COFFMAN: That would be great.

23 THE VIDEOGRAPHER: Going off, going
24 off the video record at 12:12 p.m.

25 (Proceedings in recess, 12:12 p.m. to

1 1:13 p.m.)

2 THE VIDEOGRAPHER: We're back on the
3 video record at 1:13 p.m.

4 Q Good afternoon, Dr. Murphy.

5 A Good afternoon, Ms. Houk.

6 Q You understand you're still under
7 oath?

8 A I do understand. Thank you.

9 Q Let's go to your 2012 election.

10 A Yes, ma'am.

11 Q Were you -- was that a contested
12 election?

13 A It was.

14 Q And who was your opponent there?

15 A My opponent that election was
16 Jennifer Falk.

17 Q And was Ms. Falk a Democrat or
18 Republican?

19 A Democrat.

20 Q Were there any other opponents?

21 A No, there were none.

22 Q So there was no Republican primary?

23 A No Republican primary.

24 Q And did you do fund-raising for that
25 campaign as well?

1 A Yes, I did.

2 Q Approximately how much did you raise
3 in that?

4 A About \$17,000, maybe a little bit
5 more.

6 Q Was that raised from grassroots?

7 A Grassroots.

8 Q And did you have a campaign staff
9 for that election also?

10 A I had volunteers. I had
11 approximately 20/25.

12 Q And did you have minority persons
13 volunteering in that campaign?

14 A Yes, I did.

15 Q Who were they?

16 A Ms. Gina Pollitt, an Asian mother.
17 Again, Mr. Jose Perez. And I had -- I'll have
18 to come back to that. Please forgive me.

19 Q Okay. And would you spell, is it
20 Ms. Pollitto?

21 A Pollitt, P-O-L-L-I-T-T, Pollitt.

22 Q And the first name?

23 A Gina.

24 Q Do you know how that's spelled?

25 A G-I-N-A.

1 Q And is Ms. Pollitt a Republican?

2 A I don't know what her affiliation
3 is.

4 Q Mr. Perez was a Republican?

5 A Republican.

6 Q And did you --

7 A There were others, but I'll come
8 back to that. Thank you.

9 Q Okay. If you remember, let us know.
10 Did you pretty much run the campaign
11 as you had in the past with --

12 A Yes.

13 Q -- flyers, and did you have a video
14 for that campaign also?

15 A No, we did not.

16 Q What was your campaign -- what were
17 your campaign themes?

18 A One concern that Ms. Falk raised,
19 she wanted to maintain the free and reduced
20 lunch percentage at Duluth High School to 37
21 percent, and that was very much the theme she
22 struck in the campaign.

23 Q Could you say again the high school
24 that was?

25 A Duluth.

1 Q Duluth?

2 A D-U-L-U-T-H, uh-huh (affirmative).

3 Q And what was your position about the
4 free and reduced lunch level?

5 A No, that was nothing -- my position
6 was no.

7 Q Why?

8 A We would not ever attempt to limit
9 the number of students on free and reduced
10 lunch going to any school.

11 Q So Ms. Falk wanted to limit or cap
12 the amount --

13 A Correct.

14 Q -- at 37 percent?

15 A Correct.

16 Q What were -- did you have any other
17 themes of your campaign in 2012?

18 A Those -- that was really quite the
19 dominant issue. From my campaign, we wanted
20 very much to continue with the academic
21 excellence of the curriculum, the advanced
22 placement programs that were available to all
23 students, moving students to college and career
24 readiness, emphasize the role of parents as the
25 first teachers, and safety and security in our

1 schools.

2 Q And by safety and security in the
3 schools, what were you referring to?

4 A That was a dominant issue all
5 through the campaigns that the schools would be
6 safe places for students to study, that they
7 would be safe on school buses.

8 Q And did you have specific ideas in
9 terms of how that policy would be enforced or
10 enacted during your term?

11 A No more than to say we would
12 continue what we had been doing.

13 Q And generally what was that?

14 A That the safest place for students
15 is in our schools and on our buses.

16 Q And did Ms. Falk have a contrary
17 position on school safety?

18 A Not that I would be aware. Really,
19 the issue that dominated her part of the
20 campaign was as I shared with you.

21 Q And this was the first election
22 following the 2011 redistricting of the School
23 Board?

24 A That's right.

25 Q What was the margin of your win over

1 Ms. Falk?

2 A 67 percent.

3 Q So the margin went up for that one?

4 A Yes, it did.

5 Q I would like to turn to the exhibit
6 book in front of you?

7 A Surely.

8 (Whereupon a document was identified as
9 Plaintiff's Exhibit 5.)

10 Q And turn to the exhibit that's been
11 marked previously as Exhibit 5.

12 A Uh-huh. Yes, ma'am.

13 Q Are you generally familiar with what
14 that document represents?

15 A The whole, the whole document?

16 Q It's entitled 2017 Legislative --

17 A Correct.

18 Q -- Program; is that right?

19 A Yes, ma'am.

20 Q And was that a document that was
21 produced by the School Board?

22 A No.

23 Q Who was it produced by?

24 A It would have been done by the
25 administrative staff.

1 Q What's the purpose of the
2 Legislative Program, Exhibit 5?

3 A In Gwinnett County, each, each
4 funded component of county government takes an
5 opportunity to meet with the Gwinnett
6 legislative delegation once, once a year,
7 generally in December and to state what their
8 priorities for funding for the year ahead in
9 the General Assembly might be.

10 Q Does the Board itself meet with the
11 legislative delegation?

12 A We do, but not -- we're not the only
13 component of county government that meets with
14 the General Assembly. Generally, it's a
15 one-day program. And other entities meet with
16 the General Assembly as well as we do, the
17 Gwinnett delegation.

18 Q So would the 2017 Legislative
19 Program have been written in the last quarter
20 of '16 so that you could present it to the
21 legislature --

22 A That's my understanding.

23 Q -- in December of 2016?

24 A That's my understanding.

25 Q And does this Legislative Program

1 relate specifically only to funding issues, or
2 is it broader than funding issues?

3 A Well, even looking at page two,
4 these are the core beliefs of our School
5 System, and they really don't address funding,
6 per se, but it's a part of our vision, mission,
7 and goals. So that sets the table, so to
8 speak, for the funding initiatives that are
9 underway in the rest of the document.

10 Q Okay. And is this a document that's
11 presented to the legislators to encourage them
12 to adopt or enact legislation that the School
13 Board is advocating for?

14 A Yes, that would be correct.

15 Q And are there any particular
16 areas -- strike that.

17 If you'll turn to page six of
18 Exhibit 5.

19 A Yes, ma'am.

20 Q Under the header that says Electing
21 School Board Members, do you see that?

22 A I do.

23 Q It states, "The Gwinnett County
24 Board of Education requests the Gwinnett
25 delegation to support and approve nonpartisan

1 elections for School Board members"?

2 A Yes.

3 Q Was that something you were in favor
4 of?

5 A I was not.

6 Q Why not?

7 A I, I eventually agreed to propose it
8 because it says the whole board proposes, but
9 we've never had nonpartisan elections for
10 School Board in, the best that I could
11 determine, in the history of the county. And,
12 therefore, I did not see a reason to move from
13 that position.

14 Q Other than the fact that
15 historically there's been always nonpartisan
16 elections for the school -- I mean strike that.

17 A Sure.

18 Q -- there had always been partisan
19 elections for the School Board, were there any
20 other reasons you were opposed to switching to
21 a nonpartisan election system?

22 A I believe that with a nonpart --
23 with a partisan election system, candidates can
24 be vetted by more than just one vote. It gives
25 the opportunity for a primary as well as

1 November elections. I think it's in the
2 benefit of the community to have that
3 structure.

4 Q And I take it by this reference in
5 the Exhibit 5 that other Board members did not
6 agree with your position?

7 A That's correct.

8 Q And what did the other Board members
9 in favor of nonpartisan elections state was
10 their rationale for the change?

11 A Well, a number of other school
12 boards in the country here in Georgia have
13 nonpartisan elections. That seemed to be of
14 great interest to other Board members.

15 Q Was there any discussion about the
16 changing demographics in the Gwinnett County
17 School Board districts that indicated there
18 were more Democrats moving into the districts?
19 Did that have any relationship at all to the
20 idea of proposing nonpartisan elections?

21 A I don't know that.

22 Q Did you ever hear that from any of
23 the other Board members --

24 A I didn't.

25 Q -- was their reason for supporting

1 nonpartisan elections?

2 A I did not.

3 Q When did the idea of nonpartisan
4 elections first bubble up in front of the
5 School Board?

6 A Well, I would say it could have been
7 introduced over a period of time. I don't have
8 any record of any -- any record that I can
9 access that would say when we began or when
10 that discussion began.

11 (Whereupon a document was identified as
12 Plaintiff's Exhibit 49.)

13 Q I've marked as Plaintiff's
14 Exhibit 49 an email from Alvin Wilbanks to
15 David McCleskey copied to Berney Kirkland and
16 Jorge Gomez dated January 31st, 2010.

17 A Thank you very much.

18 Q Take a look at that.

19 Let me ask you preliminarily, have
20 you ever seen that email before?

21 A I have not.

22 Q And it's Bates stamped School
23 District 018231. Do you know Representative
24 Hugh Floyd?

25 A I do.

1 Q And who is Representative Floyd.

2 A He was a representative to the
3 Georgia General Assembly who chose not to run
4 maybe now four years ago, for sure two years
5 ago.

6 Q Was he on the local delegation for
7 Gwinnett County in 2010?

8 A Yes.

9 Q And were you aware of David
10 McCleskey having contact with him concerning a
11 possible bill to increase the size of the
12 County Commission from five to seven numbers?

13 A No.

14 Q Were you aware of a possible bill to
15 make School Board elections nonpartisan that he
16 was looking into?

17 A No.

18 Q Did you know in 2010 that there were
19 discussions by David McCleskey about adopting a
20 nonpartisan School Board process?

21 A No, not that I recall.

22 Q As superintendent of the Gwinnett
23 County Public School District, what are Alvin
24 Wilbanks's duties and responsibilities?

25 A Oh, his major responsibility is to

1 manage the School District in all of its
2 capacities and functions.

3 Q Were you on the School Board when
4 Mr. Wilbanks was hired?

5 A I was not.

6 Q What is your relationship with
7 Mr. Wilbanks?

8 A I think it's a very cordial,
9 professional relationship.

10 Q Do you socialize with him at all?

11 A No.

12 Q And you said that he's responsible
13 for managing the School District's functions
14 and business; is that right?

15 A Correct, and responsibilities.

16 Q Okay. And does that entail in any
17 way School Board elections?

18 A In what capacity?

19 Q In any capacity.

20 A Well, that's not -- I don't know.

21 Q Are there any kind of written job
22 descriptions of Mr. Wilbanks's duties and
23 responsibilities?

24 A Well, the closest thing that would
25 come would be his evaluation.

1 Q And who prepares the evaluation?

2 A The School Board reviews it, and the
3 actual physical preparation of it is done
4 within Mr. Wilbanks' office.

5 Q Who initially drafts it?

6 A Mr. Wilbanks.

7 Q He drafts his own evaluation?

8 A No, not -- I wouldn't want it to be
9 seen in that light. He prepares it. Our
10 School Board has agreed with Mr. Wilbanks as to
11 the areas where he will be evaluated.

12 Q And what are the areas of -- strike
13 that.

14 What are the areas he's evaluated
15 in?

16 A His leadership of the School
17 System's 22,500 employees, the school
18 responsibility, leadership of the academic
19 program. Those would be the major areas.

20 Q Taking the first item, the school
21 leadership of the School System's employees,
22 does that have any relationship at all to
23 elections?

24 A I don't believe so.

25 Q Does his fiscal responsibility have

1 anything to do with elections?

2 A I don't believe so.

3 Q Does his leadership of the academic
4 programs have anything to do with elections?

5 A I don't believe so.

6 Q Is there any area in which he's
7 evaluated on that relates in any way to
8 elections?

9 A I would say this: that he is
10 evaluated on how well he communicates with
11 constituencies, and those are wide ranging, and
12 one of our major constituencies is the General
13 Assembly. General Assembly funds -- the State
14 of Georgia funds approximately 50 to 60 percent
15 of the education programs and their cost in
16 Gwinnett County.

17 And, of course, we can make a move
18 from there to say that the very people he works
19 with are the very ones in the General Assembly
20 are the very ones who do provide information
21 about elections, but it's not, it's not so
22 direct. However, there is a link.

23 Q All right. So are you talking about
24 elections of members of the Georgia
25 legislature?

1 A I'm talking about one of the -- that
2 they're the body that has responsibility for
3 elections. But it is not, it is not a direct
4 link.

5 Q What do you mean by that?

6 A His relationship with the General
7 Assembly has to do with the funding of the
8 School System through the whole state and for
9 Gwinnett County.

10 Q What part of Mr. Wilbanks's duties
11 and responsibilities relate in any way to the
12 drawing of Board member districts?

13 A The General Assembly is the group
14 that draws the Board -- that draws the
15 districts.

16 Q That's not my question. My question
17 is: What are Mr. Wilbanks's duties and
18 responsibilities with respect to drawing Board
19 member districts?

20 A I don't know.

21 Q Who would know?

22 A You might want to consult with the
23 General Assembly. I don't know the inner
24 workings of that.

25 Q That's not something the Board of

1 Education supervises Mr. Wilbanks on?

2 A No.

3 Q Is that part of his job evaluations
4 by the Board?

5 A The voting? The election?

6 Q The drawing of election districts?

7 A No.

8 Q Is the -- strike that.

9 As a member of the Gwinnett County
10 Board of Education, do you expect that
11 Mr. Wilbanks spends the time when he's working
12 on the job doing School Board business and
13 School District business versus personal
14 business?

15 A Well, he has a contract and some --
16 in his contract there are some provisions made
17 for working at home, but that certainly is the
18 expectation of the Board that he would be
19 working on School Board business.

20 Q And is that the expectation
21 generally that School District employees when
22 they are on the job are doing School District
23 business and not personal business?

24 A I would say so.

25 Q Prior to your deposition today, did

1 you review any part of Dr. McClure's deposition
2 transcript?

3 A I did not.

4 Q Did you review his video of his
5 deposition?

6 A I did not.

7 Q Did you speak to Dr. McClure about
8 his deposition?

9 A I did not.

10 Q Have you spoken to anyone about this
11 litigation other than your lawyers in a
12 confidential conversation?

13 A I have not.

14 Q So that means you haven't talked to
15 any other Board members --

16 A That's correct.

17 Q -- about this litigation? Did
18 you -- and you didn't talk to Louise Radloff
19 about her deposition?

20 A I did not.

21 Q Do you socialize with any of the
22 other Board members?

23 A No.

24 Q Have you been to any of their homes?

25 A Once a year for a number of years,

1 we would have a Christmas party at one of the
2 School Board member's homes, and we aren't
3 doing that very much anymore. But, yes, I
4 would have, I believe, of the other four.

5 Q Have you talked to School Board
6 members at Republican Party functions?

7 A No, not, not in any recent years.

8 Q Can you describe what you mean by
9 recent years?

10 A I would say in the last, in the last
11 six, six to eight years, six to ten.

12 Q Have you talked to any members of
13 the General Assembly about the redistricting
14 plan that was adopted in 2011?

15 A I have not.

16 Q Did any of the members of the local
17 delegation attempt to contact you to discuss
18 the redistricting plan at any time --

19 A No.

20 Q -- to your knowledge?

21 A No.

22 Q Do you know Senator Balfour?

23 A I do.

24 Q How do you know Senator Balfour?

25 A Through his being elected to the

1 state senate.

2 Q Have you ever had occasion to talk
3 to him?

4 A I have not.

5 Q Do you know Representative Rice?

6 A Yes, I do.

7 Q And how do you know him?

8 A Through his position, his past
9 position, as a house member of the Georgia
10 General Assembly.

11 Q Did you ever talk to him about
12 redistricting?

13 A No.

14 Q Have you talked to him about
15 anything?

16 A No.

17 Q Who are the current members of the
18 local delegation in Gwinnett County?

19 A Oh, there might be eight or nine of
20 them.

21 Q Do you recall who they are?

22 A One is Scott Hilton, Brooks
23 Coleman, David Shafer, Buzz Brockway. And
24 you're asking me of just the Democrats or
25 Republicans? Both?

1 Q Both.

2 A Okay. Curt, Curt Thompson, Pedro
3 Marin. I think those would be the main ones.

4 Q Have you talked to any of those
5 individuals about redistricting?

6 A No. Oh, excuse me. Chuck
7 Efstration.

8 Q Have you talked to him about
9 redistricting?

10 A I have not. And P.K. Clark, and
11 there's another, David Clark. I have not
12 talked to any of them about redistricting.

13 (Whereupon a document was identified
14 as Plaintiff's Exhibit 17.)

15 Q If you wouldn't mind taking the
16 exhibit book in front of you and turning to
17 Plaintiff's Exhibit 17, please.

18 A Surely. Thank you.

19 Q Have you had a chance to review it?

20 A Yes, ma'am.

21 Q In the first line -- well, strike
22 that.

23 Just for identification, the date of
24 this email is May 17th, 2011, at 7:32 p.m. Is
25 that what it shows on the document --

1 A Yes.

2 Q -- in the right corner?

3 A Yes, uh-huh.

4 Q And it's from Alvin Wilbanks, the
5 superintendent of the Gwinnett County Public
6 Schools, to Greg Stanfield in the planning
7 department?

8 A Yes, ma'am.

9 Q And it was copied to Berney Kirkland
10 and Jorge Gomez?

11 A Correct.

12 Q And who is Berney Kirkland?

13 A She is, she is the chief of staff
14 for the superintendent.

15 Q And Mr. Gomez, what is his role?

16 A He is executive director of projects
17 for the superintendent.

18 Q And the title of the email is Board
19 Member Districts; is that right?

20 A Yes, it is.

21 Q And in the first line, it states, "I
22 am asking all of you to keep this matter
23 confidential for the moment." Do you see that?

24 A Yes, I do.

25 Q Do you know why Mr. Wilbanks would

1 send an email to these individuals asking them
2 to keep the content confidential when it
3 relates to the drawing of Board member
4 districts?

5 A I do not.

6 Q Were you aware that Mr. Wilbanks was
7 communicating with other employees of the
8 School District about Board member districts in
9 2011?

10 A No.

11 Q The next paragraph starts, "Greg,
12 you have done some work on tentative board
13 member districts over the past 18 months." Do
14 you see that?

15 A I do.

16 Q That's referring to Greg Stanfield?

17 A Yes, ma'am.

18 Q Were you aware that Mr. Stanfield
19 had been working on tentative Board member
20 district maps --

21 A No.

22 Q -- over the course of an 18-month
23 period?

24 A I was not.

25 Q Assuming that what Mr. Wilbanks says

1 in this email is correct, would you have
2 expected that Mr. Stanfield would be drawing
3 tentative Board member district maps over the
4 course of 18 months before May 17th, 2011?

5 MR. COFFMAN: Objection. The
6 question is vague and assumes facts not in
7 evidence, but you can answer if you're able to.

8 A Would you be so kind as to ask
9 again?

10 Q Sure. Prior to -- strike that.

11 Are you surprised to see that
12 Mr. Wilbanks sent an email in which he
13 recounted that Greg Stanfield had been working
14 on tentative Board member district maps for the
15 course of -- over the course of 18 months
16 before May 17th, 2011?

17 A I don't -- I honestly don't know.

18 Q It goes on to state, "Time is near
19 that we will be needing to have some
20 recommendations for this task and be in a
21 position to notify and assist the legislature
22 in drafting the new district lines based on the
23 2010 census data." Do you see that?

24 A I do.

25 Q Was it the Board's expectation that

1 Mr. Wilbanks would be assisting the state
2 legislature in the drawing of new district
3 lines based on the 2010 census?

4 A I don't know that.

5 Q Was that within his job duties and
6 responsibilities as superintendent of the
7 Gwinnett County Public Schools?

8 A Well, to the extent that he has
9 relationship with the General Assembly, it's
10 certainly, as one of the major constituents of
11 our School System, it certainly would be within
12 responsibility.

13 Q And the Board would have approved
14 this conduct; is that right?

15 A The Board has no position on this,
16 and the Board never took a position on this.
17 When I say that, I mean five of us to vote.

18 Q How much time did Mr. Wilbanks spend
19 in 2011 on redistricting issues?

20 A I do not know.

21 Q In Mr. Wilbanks' evaluation, is
22 there any kind of discussion about the time he
23 spends on various tasks --

24 A No.

25 Q -- for the School District? No?

1 A No.

2 Q The email goes on to state,
3 "Therefore, could you get your copies out and
4 schedule an appointment to meet with me to get
5 this started? Here are a few things the Board
6 has already asked me to do." Do you see that?

7 A I do.

8 Q Did the Board ever ask Mr. Wilbanks
9 to do anything at all with respect to
10 redistricting in 2011?

11 A I, I do not know.

12 Q And if the Board had done so
13 collectively, in what form would that have
14 occurred in?

15 A Well, if it had done so
16 collectively, we would have had a vote on it.
17 And I don't recall having a vote on it.

18 Q Do you believe that Mr. Wilbanks is
19 an honest and truthful person?

20 A I do.

21 Q Do you know why he would say in an
22 email to other staff members of the School
23 District that the Board had asked him to do
24 something if they had not done that?

25 A Please ask your question again.

1 Q Sure. Since Mr. Wilbanks in your
2 estimation is an honest and trustworthy person,
3 why do you think he would say to other staff
4 members that the Board had asked him to look
5 into redistricting if that had not occurred?

6 MR. COFFMAN: Objection. Improper
7 hypothetical, but you can answer.

8 A I did -- when I spoke to you about
9 voting collectively or responding collectively
10 or requesting collectively, I meant to say the
11 five members did not vote for this to be the
12 request.

13 I do believe Mr. Wilbanks is an
14 honest and reliable leader. I've found him to
15 be that always. And it may be -- I honestly
16 don't know. I don't know why he would have
17 said that.

18 Q And the email goes on to have four
19 bullet points identifying the things that
20 Mr. Wilbanks is saying the Board had asked him
21 to do, and first is "Look at the criteria for
22 drawing the lines, i.e., what are the
23 population tolerances between the districts."
24 Do you see that?

25 A I do.

1 Q Did the Board in your knowledge ever
2 ask Mr. Wilbanks to look into that?

3 A Not that I'm aware.

4 Q The next bullet point says, "What
5 would new districts look like based on the
6 bullet above and keeping the same number of
7 districts - five districts?"

8 Is that something that the Board
9 asked Mr. Wilbanks to look into?

10 A Not that I'm aware of.

11 Q The next bullet point says, "What
12 would new districts look like based on having
13 seven member Board districts?" Do you see
14 that?

15 A I do.

16 Q Did the Board ever ask Mr. Wilbanks
17 to look into that?

18 A No, not that I'm aware of.

19 Q And then the next bullet point says,
20 "What would it look like having six Board
21 districts and one at large district?" Do you
22 see that?

23 A I do.

24 Q Did the Board ever ask Mr. Wilbanks
25 to look into that?

1 A Not that I'm aware.

2 Q The email ends, "Greg, I am asking
3 Jorge to help with the first bullet and also a
4 time frame for us to notify the election
5 officials. I will have that information when
6 we meet. Thanks."

7 Do you know whether the Board ever
8 asked Mr. Wilbanks to notify election officials
9 about these bullet point issues?

10 A I do not.

11 Q I'd like you to turn to the next
12 page of Exhibit 17, which has the School
13 District Bates number 014130.

14 A All right.

15 Q And take a moment to review it.

16 A Thank you.

17 Q Referring to the date and time of
18 this email, it states on this document at Bates
19 014130, it was dated May 17th, 2011, at
20 7:39 p.m.; correct?

21 A Correct.

22 Q And that's just a few minutes after
23 the previous email that was sent at 7:32 on the
24 same day.

25 A Correct.

1 Q And this email is entitled Election
2 Board; is that right?

3 A Correct.

4 Q And it was sent from Alvin Wilbanks
5 to Jorge Gomez?

6 A Yes, ma'am.

7 Q And copied to Berney Kirkland and
8 David McCleskey?

9 A Correct.

10 Q And, again, Mr. Wilbanks has some
11 bullet points on this document, but before the
12 bullet points in the last sentence, it says,
13 "Also, David," referring to David McCleskey, "I
14 think we would want Senator Balfour to head
15 this up for us. What would you -- or who would
16 you suggest."

17 Do you know why Alvin Wilbanks would
18 ask to have Senator Balfour lead up
19 redistricting on behalf of the Board of
20 Education?

21 A I don't know.

22 MR. COFFMAN: Objection. That
23 assumes facts that are not in evidence.

24 Q Do you know what Alvin Wilbanks
25 meant when he said he wanted Senator Balfour to

1 head this up for us?

2 A I do not.

3 Q Do you know who the "us" was that he
4 was referring to?

5 A I do not.

6 Q In the first bullet point on this
7 page, it states, "When do we need to notify
8 them about our intentions to have the SPLOST 4
9 on the November 2011 ballot?" Do you see that?

10 A Yes.

11 Q What is the SPLOST 4?

12 A It is a special purpose local option
13 sales tax. It was approved by the General
14 Assembly in 1996, and it allows counties within
15 the state to bring a referendum to the voters
16 as to whether or not one penny of every dollar
17 spent in the county can go towards schools,
18 facilities, and bond, and reducing bonds.

19 Q Did Mr. Wilbanks have any duties and
20 responsibilities related to that issue?

21 A Yes, he does.

22 Q And what are those?

23 A Financial.

24 Q The next bullet point says, "Do they
25 have 2010 census data that will give us

1 population data and percentages for district
2 tolerances. If not, where can we get it?" Do
3 you see that?

4 A I do.

5 Q Why was Mr. Wilbanks looking for
6 2010 census data with that information?

7 A Well, this would be following --
8 this would be it looks like for the 2012
9 election.

10 Q Why do you say that?

11 A Because the date on this is 2011 in
12 anticipation of the 2012 elections.

13 Q And you don't believe that that
14 second bullet point is related to the
15 redistricting of the School Board districts?

16 A I, I don't believe that it specifies
17 that, not at all.

18 Q When it refers to percentages for
19 district tolerances, isn't that relating to the
20 School Board districting rather than the 2012
21 elections?

22 A Would you ask your question again?

23 Q Sure. The second bullet point says,
24 "Do they have 2010 census data that will give
25 us population data and percentages for district

1 tolerances. If not, where can we get it?"

2 A Well, it would be toward the end of
3 the 2012 elections. That's what I'm saying.
4 That's how I read that.

5 Q So you don't think it relates to
6 School Board member districts?

7 A I don't, I don't read it that way.

8 Q And the third bullet point says,
9 "Any other information that gives data
10 regarding redistricting and census data
11 regarding the redistricting process for Board
12 member districts?" Do you see that?

13 A I do.

14 Q And did Mr. Wilbanks have any duties
15 and responsibilities regarding the gathering of
16 data, including census data, regarding the
17 redistricting process for Board member
18 districts?

19 A Well, Mr. Wilbanks is -- manages the
20 process.

21 Q He manages what process?

22 A Of enrollment of the students in our
23 schools. And so there would be, there would be
24 a link toward finding out how our district is
25 growing, and that's an important measure of

1 preparing the School District for the special
2 purpose local option sales tax.

3 We have to give a list of the
4 projects that will be voted on by the voters,
5 and it would be important to have current
6 information on where those schools are most
7 greatly needed. That's how I would link those
8 two.

9 Q And why is he referencing in the
10 third bullet point Board member districts
11 rather than attendance districts, if that's how
12 you interpret his writing there?

13 A I don't -- I honestly don't know. I
14 don't know the distinction.

15 Q Do you know someone named Peter
16 Combs?

17 A I don't.

18 Q C-O-M-B-S.

19 A I do not.

20 Q I'd like you to turn to the next
21 page of Exhibit 17.

22 A Thank you.

23 Q And this is an email -- excuse me.
24 Go ahead and review that over.

25 A Oh, thank you. Thank you.

1 Q Referring to the date and time of
2 this email, it's May 19th, 2011, at 6:51 a.m.;
3 is that right?

4 A Yes, ma'am.

5 Q And it's an email entitled Election
6 Board from David McCleskey to Alvin Wilbanks.
7 Do you see that?

8 A Yes, ma'am.

9 Q And it's also copied to Berney
10 Kirkland and Jorge Gomez?

11 A Correct.

12 Q And it states in the first line, "I
13 had a follow-up conversation with the
14 Legislative & Congressional Reapportionment
15 Office late yesterday." Do you see that?

16 A I do.

17 Q Do you know what the Legislative &
18 Congressional Reapportionment Office does?

19 A It would serve the whole state, and
20 it would be related to carrying out the census
21 of 2010.

22 Q What do you mean "carrying out the
23 census of 2010"?

24 A In terms of reapportionment.

25 Q Reapportionment of the School Board?

1 A Not of the School Board, of the --
2 of the residents of the county and of the
3 state. So it's there to serve the whole state.

4 Q The email goes on to say, "Senator
5 Balfour (after you contact him) will notify the
6 Legislative & Congressional Reapportionment
7 Office to initiate our request for the drawing
8 of Board districts." Do you see that?

9 A I do.

10 Q What request was being made by
11 anyone at the Gwinnett County Public School
12 District to the Legislative & Congressional
13 Reapportionment Office to initiate a request
14 for the drawing of Board districts?

15 A I do not know.

16 Q Do you know why Mr. McCleskey would
17 say that Senator Balfour would notify the
18 Legislative & Congressional Reapportionment
19 Office to initiate a request, our request, for
20 the drawing of Board districts?

21 A I do not.

22 Q The last substantive line of the
23 email states, "Let me know when you want me to
24 get Senator Balfour on the line to speak with
25 him." Do you see that?

1 A I do.

2 Q Do you know why Alvin Wilbanks would
3 be speaking to Senator Balfour about a request
4 for the drawing of Board districts?

5 A I do not.

6 MR. COFFMAN: Objection. That
7 question assumes facts that are not in
8 evidence.

9 Q When the Gwinnett County Board of
10 Education holds public meetings, are minutes
11 ultimately --

12 A Yes.

13 Q -- drafted? What are the purpose of
14 the minutes?

15 A To inform the public.

16 Q About what?

17 A Of the topics that were discussed
18 and the information that is important to be
19 shared with the community.

20 Q And what types of information in
21 your view are important to be shared with the
22 community in the course of Board meetings and
23 through the minutes?

24 A Well, the topics that were
25 discussed, those who address the Board, those

1 who were honored by the Board, those kinds of
2 things.

3 Q And who creates the agenda for the
4 School Board meetings?

5 A Mr. Wilbanks and his office.

6 Q And does the Board have input on the
7 subject matter that are covered in the agenda?

8 A We always have input, but for the
9 most part, it is an agenda developed by the
10 superintendent's office.

11 Q And does the superintendent often
12 include legislative updates in the Board
13 agendas and minutes?

14 A No, not that I'm aware.

15 Q And does Mr. Wilbanks' office take
16 responsibility for drafting minutes?

17 A Yes.

18 Q To your knowledge, during any of the
19 Board meetings in 2011, was there any
20 discussion of the redistricting of Board member
21 districts?

22 A Not to my knowledge.

23 Q Did Mr. Wilbanks ever propose
24 including on any agenda information about how
25 he and members of the School District staff

1 were developing plans for the redistricting of
2 the Board member districts?

3 A Not to my understanding.

4 Q Do you know why he would not do that
5 if he was spending time working on that
6 project?

7 A I do not.

8 Q Do staff sometimes present
9 information to the Board and public at School
10 Board meetings?

11 A There's a time in the Board meeting
12 when we review projects from the SPLOST and
13 from -- well, I guess primarily from the
14 SPLOST, and staff members are available to
15 answer questions that Board members might have,
16 how the projects are coming, what's the balance
17 of the funding available, that kind of thing.

18 Q Does Greg Stanfield sometimes
19 present information at Board meetings?

20 A No.

21 Q Does Mr. McCleskey?

22 A No.

23 Q Do you recall any time that
24 Mr. Wilbanks presented information about
25 projects that Mr. Stanfield was working on to

1 the Board at a public meeting?

2 A No.

3 (Whereupon a document was identified as
4 Plaintiff's Exhibit 14.)

5 Q If you wouldn't mind turning to the
6 exhibit book in front of you to Exhibit 14.

7 A All right. Yes, ma'am.

8 Q The date of this document is May
9 23rd, 2011 --

10 A Yes, it is.

11 Q -- right? And it appears to be a
12 letter from Senator Don Balfour from Senate
13 District 9 to the Legislative & Congressional
14 Reapportionment Office; is that right?

15 A Correct.

16 Q And the letter states, "This letter
17 is to convey authorization for all Gwinnett
18 County commissioners and Gwinnett County School
19 Board members and administrators to meet with
20 the Legislative & Congressional Reapportionment
21 Office to discuss County Commission district
22 lines and School Board district lines." Do you
23 see that?

24 A I do.

25 Q Were you ever aware that this letter

1 existed?

2 A No.

3 Q Did you or any of the other Board
4 members ever address or meet with the
5 Legislative & Congressional Reapportionment
6 Office?

7 A No.

8 Q Do you know why Senator Balfour
9 would convey authorization to the Legislative &
10 Congressional Reapportionment Office for
11 Gwinnett School Board members to meet with the
12 staff there?

13 A No.

14 Q Have you ever met with the staff at
15 the Legislative & Congressional Reapportionment
16 Office?

17 A No.

18 Q Have you ever talked to them or
19 emailed them?

20 A No.

21 Q And Senator Balfour is the same
22 person that was referred to in the second page
23 of the Exhibit 17, by Mr. Wilbanks -- strike
24 that. By, yes, by Mr. Wilbanks? Let me start
25 over.

1 Looking at the third page of
2 Exhibit 17, Senator Balfour was referred to by
3 Mr. McCleskey as someone that they were going
4 to ask to head up the redistricting effort;
5 correct?

6 A Correct.

7 (Whereupon a document was identified as
8 Plaintiff's Exhibit 15.)

9 Q Okay. I'd like you to turn to
10 what's been marked in the exhibit book as
11 Exhibit 15.

12 A Thank you.

13 Q Take a look a look at that, please.

14 A Yes, ma'am.

15 Q Prior to June 28th, 2011, had you
16 ever been involved in any conversations with
17 other Board members about whether the size of
18 the Board should be changed from five member
19 districts to six with an at large chair or
20 seven member districts?

21 A Not that I recall.

22 Q Did you ever hear that any proposal
23 or consideration of that was being made by
24 anyone in the legislature before June 28th,
25 2011?

1 A No.

2 Q And in Exhibit 15, at the top, it's
3 an email from David McCleskey to Greg
4 Stanfield, both of whom are School District
5 employees; correct?

6 A Correct.

7 Q Courtesy copied to Brian Knight and
8 Jorge Gomez. Do you know who Brian Knight is?

9 A I do not.

10 Q And there were two attachments to
11 this email, one was 2010 Block Groups 5b in a
12 pdf format and a Census 2010 Tract Block 5
13 Excel sheet. Do you see that?

14 A I do.

15 Q Do you know why David McCleskey was
16 sending an email that included those
17 attachments and copied to Brian Knight who is
18 actually in the Legislative & Congressional
19 Reapportionment Office?

20 A No, I don't.

21 Q Do you know what data is included in
22 census tract and blocks?

23 A I don't.

24 Q Have you ever reviewed census data
25 yourself?

1 A No.

2 Q And moving down the page, there's an
3 email from Greg Stanfield to Brian Knight on
4 June 28th, 2011, at 9:26 in which he states,
5 "Brian, good morning. I have attached another
6 map with five districts I would like to compare
7 to see if the numbers jive when we meet on
8 Thursday. I've also attached the tract and
9 census block group data from the census to
10 create the proposal."

11 Do you know what proposals were
12 being made by Gwinnett County Public Schools
13 staff --

14 A I do not.

15 Q -- to the --

16 A Excuse me.

17 Q -- Legislative & Congressional
18 Reapportionment Office?

19 A I'm sorry. No, I do not.

20 Q Do you know why Greg Stanfield was
21 sending 2010 census block and tract data to the
22 Legislative & Congressional Reapportionment
23 Office?

24 A I do not.

25 Q Assuming that Mr. Stanfield had done

1 this, was that outside the course and scope of
2 his duties and responsibilities for the
3 Gwinnett County Public School System?

4 A I do not know.

5 Q Who would know that?

6 A Mr. Supe -- I'm sorry. Our
7 superintendent, Mr. Wilbanks.

8 (Whereupon a document was identified as
9 Plaintiff's Exhibit 16.)

10 Q If you would turn to the next
11 exhibit, which is number 16 in the book.

12 A Yes, ma'am.

13 Q You've had an opportunity to review?
14 It's a series of emails --

15 A Yes.

16 Q -- over a course of a couple of
17 days. Do you see that?

18 A I do.

19 Q And just turning to the last page
20 first of Exhibit 16, there's an email from Greg
21 Stanfield to Brian Knight at the Legislative &
22 Congressional Reapportionment Office that was
23 courtesy copied to David McCleskey, Jorge --
24 and Jorge Gomez and someone named Shantée El.
25 Do you see that?

1 A I do.

2 Q And that was on July 1st, 2011, at
3 9:58 a.m.?

4 A Correct.

5 Q And the email states, "Brian, good
6 morning. Thanks again for working with me
7 yesterday on the two proposed maps. Please
8 forward the pdfs when possible as well as the
9 tables with numbers on the other proposals
10 previously developed. Let me know if you have
11 any questions, and have a great holiday
12 weekend."

13 Do you know why Greg Stanfield was
14 sending this email to Brian Knight at the
15 Legislative & Congressional Reapportionment
16 Office talking about working with him on two
17 proposed maps?

18 A I do not.

19 Q Was that within the course and scope
20 of Mr. Stanfield's duties and responsibilities
21 as a School District employee to do that?

22 A I do not know.

23 Q I'd like you to turn going backwards
24 to the second page of Exhibit 16 to the email
25 from Greg Stanfield to Brian Knight, copied to

1 McCleskey and Gomez, on July 12th, 2011, at
2 11:11 a.m. Do you see that?

3 A Yes, ma'am.

4 Q And this is Mr. Stanfield writing an
5 email that --

6 A Excuse me.

7 Q -- states, "Good morning. Just as
8 a" --

9 A Excuse me.

10 Q Do you want to take a break?

11 A No. Thank you so much. Excuse me.

12 Q It says, "Good morning. Just as a
13 follow-up to our conversation this morning, I
14 will need the information requested below as we
15 will be meeting with Representative Rice next
16 week."

17 Do you know why Greg Stanfield would
18 be meeting with Representative Rice about
19 redistricting of the Board member districts?

20 A I do not.

21 Q Was that within the course and scope
22 of his duties and responsibilities?

23 A I do not know.

24 Q And turning to the first page at the
25 top, that's an email from Greg Stanfield to

1 Brian Knight dated July 15th, 2011, at
2 10:16:50 a.m. Do you see that?

3 A I do.

4 Q And there were four attachments; is
5 that right?

6 A Correct.

7 Q And the email from Mr. Stanfield to
8 Brian Knight states, "Thanks, Brian. The first
9 attachment, however, is for the older proposal
10 for seven districts. We also worked on a newer
11 proposal for five. I need that one as well."
12 Do you see that?

13 A I do.

14 Q Do you know why Mr. Stanfield would
15 have been working on proposals for seven and
16 five-member districts with the Legislative &
17 Congressional Reapportionment Office?

18 A I do not.

19 (Whereupon a document was identified as
20 Plaintiff's Exhibit 50.)

21 Q I'd like to mark a document that
22 was produced in discovery by the School Board
23 entitled Redistricting Local Governments in
24 2011. It's School District Bates stamp 018205
25 to 018208. And we'll mark that as Exhibit 50.

1 A Thank you very much. Yes, ma'am.

2 Q Have you ever seen that document
3 before?

4 A I have not.

5 Q Did the School Board ever get any
6 kind of information like this or similar to
7 this explaining what the redistricting process
8 involved?

9 A No, not according to what I know.

10 Q And you don't know who prepared this
11 document?

12 A I do not.

13 Q Or its purpose?

14 A I do not.

15 (Whereupon documents were identified as
16 Plaintiff's Exhibit 8 and Plaintiff's
17 Exhibit 9.)

18 Q I'd like you to turn to the exhibit
19 book in front of you to Exhibits 8 and 9. You
20 can look at them in order.

21 A Thank you. Thank you.

22 THE VIDEOGRAPHER: Five minutes
23 left.

24 MS. HOUK: This is probably a good
25 time to take a break if you need to change the

1 tape.

2 THE VIDEOGRAPHER: Going off the
3 video --

4 THE WITNESS: All right. Thank you.

5 THE VIDEOGRAPHER: Going off the
6 video record at 2:22 p.m.

7 (Proceedings in recess, 2:22 p.m. to
8 2:38 p.m.)

9 THE VIDEOGRAPHER: We're back on the
10 video record. This is the beginning of video
11 file number three. The time is 2:38 p.m.

12 Q Dr. Murphy, you know you're still
13 under oath?

14 A Yes, ma'am. Thank you.

15 Q And before the break, I had you look
16 at Exhibits 8 and 9 in the exhibit book.

17 A Correct.

18 Q And I want to direct you first to 9,
19 which is the map, and does this map -- this is
20 from the 2000 era plan. Does that reflect what
21 your district looked like between 2000 and
22 2010?

23 A Yes, it does.

24 Q And you're in District 3, and that's
25 to the left side of the county?

1 A That's correct.

2 Q Sort of the middle left side of the
3 county?

4 A Correct.

5 Q And does that map reflect any school
6 clusters?

7 A It does. It reflects the Norcross
8 cluster.

9 Q How many school clusters were in
10 District 3 between 20 -- strike that -- between
11 2000 and 2010?

12 A In 2000, we had the Norcross
13 cluster, and then in the 2010 census, that
14 would have added the Duluth cluster, but that
15 would not be reflected in the time you've
16 mentioned now.

17 Q And directing your attention to
18 Exhibit 8, and this would be the 2000 era plan
19 overlaid with the 2010 census data.

20 A All right.

21 Q And you see in the population
22 column --

23 A Yes, ma'am.

24 Q -- for the five districts, the
25 apportionment of the districts was not close to

1 being equal at that time?

2 A That's correct.

3 Q And one of the goals of
4 reapportionment is to bring the districts in
5 line so that they have similar overall
6 populations; correct?

7 A Yes.

8 Q And in the columns for the black
9 percentage overlaid on the 2000 plan, it has
10 18.82 percent black population. Do you see
11 that?

12 A Yes, I do.

13 Q Does that appear correct to you?

14 A I would think so.

15 Q And then in the far right column, it
16 has the Hispanic or Latino population
17 percentage at 24.09; is that right?

18 A And that was in 2000?

19 Q This is the 2010 census data
20 overlaid on the 2000 plan.

21 A Okay. Yes.

22 (Whereupon documents were identified as
23 Plaintiff's Exhibit 10 and Plaintiff's
24 Exhibit 11.)

25 Q And I'd like to direct your

1 attention to Plaintiff's Exhibits 10 and 11 in
2 the book.

3 A Okay. Yes, ma'am.

4 Q And directing your attention first
5 to the map, does that map show the
6 configuration of your District 3 as it existed
7 after the legislature approved the
8 reapportionment in 2011?

9 A Correct.

10 Q And are you familiar at all with
11 some of the criteria that is used by the
12 legislature in determining how to draw election
13 district lines?

14 A I am not.

15 Q Were you ever familiar with a
16 concept called compact districts --

17 A No.

18 Q -- or referred to as compact
19 districts?

20 A No.

21 Q Would it be fair to say that your
22 District 3 in the 2000 era plan was more
23 compact than the District 3 in the 2011 plan?

24 MR. COFFMAN: Objection. That calls
25 for a legal conclusion.

1 A I, I don't know.

2 Q What's your understanding of the
3 definition of the term compact?

4 MR. COFFMAN: Objection. That's --
5 yeah, she's already said she doesn't know, and
6 that calls for a legal conclusion. It's a term
7 of art.

8 Q You can answer.

9 A I don't know. I don't understand it
10 in application of what you're asking me here.

11 Q Are you familiar with the term
12 gerrymander?

13 A I am.

14 Q And what's your understanding of the
15 term gerrymander?

16 A To, to take some, some type of a
17 group, political group for the most part, and
18 make certain that they are represented in
19 numbers that might favor them.

20 Q And is that sometimes done on racial
21 grounds as well as partisan?

22 A I believe so.

23 Q In the 2000 era plan your district
24 did not extend all the way to the northern
25 boundary of Gwinnett County, did it?

1 A That's correct.

2 Q Do you know why in the 2011 plan
3 your district was taken from the middle area of
4 the county all the way up to the northern
5 boundary on the west side?

6 A This, this understanding that I have
7 is the enrollment grew and the need for
8 additional schools grew. And this wouldn't
9 have been the only district that changed its
10 geographic representation comparing the map all
11 around.

12 Q But do you know why specifically
13 your district grew to the northernmost border
14 of the county?

15 A I do not.

16 Q What are the demographics of the
17 northwest corner of Gwinnett County?

18 A I don't, I don't know those
19 demographics. You mean right now?

20 Q Yes.

21 A I don't because this has changed a
22 good -- I mean the demographics have changed a
23 good bit since the 2011 map.

24 Q There's an area in the sort of
25 middle of Exhibit 11 of District 3 that I want

1 to say it looks like sort of a heart shape on
2 its side in the Exhibit 11, 2011 map.

3 A I see that.

4 Q And that was previously --

5 MR. COFFMAN: I'm sorry. I'm sorry
6 to interrupt. Which district are we talking
7 about?

8 MS. HOUK: I'm referring to this
9 area on Exhibit 11. It's like a heart-shaped
10 area. It's underneath --

11 MR. COFFMAN: All right. Like
12 around Lawrenceville?

13 MS. HOUK: Yes.

14 MR. COFFMAN: Okay.

15 Q What is the -- what are the
16 demographics of that area?

17 A I do not know.

18 Q Referring to the Exhibit 10, which
19 shows the population and racial demographics
20 for black and Latino individuals in that 2011
21 plan, and comparing it to Exhibit 8, which was
22 the 2010 census data overlaid on the 20 -- 2000
23 plan, the black population of your district was
24 reduced; isn't that correct? It went from
25 18.82 percent down to 14.6 percent in the final

1 plan.

2 MR. COFFMAN: Are you asking her a
3 question?

4 MS. HOUK: Yes.

5 MR. COFFMAN: What's the question?
6 All I heard you say was a statement.

7 MS. HOUK: All right. I'm referring
8 to that exhibit that she's referring to which
9 is Exhibit 10.

10 MR. COFFMAN: Okay.

11 THE WITNESS: And.

12 MR. COFFMAN: I'm just going to
13 object. There's not a question being asked.
14 You just made a statement about the
15 percentages. Maybe you didn't mean to do that,
16 but are you asking her to validate what's
17 written on there? I mean, I just don't --

18 Q Yes. Comparing Exhibit 8 and the
19 overlay of the 2010 census data on the 2000
20 plan and then comparing it to Exhibit 10, which
21 is the 2011 plan statistics, the black
22 population went down from 18.82 percent in the
23 overlay of the 2010 census data on the 2000
24 plan to 14.6 percent in the final plan that was
25 adopted by the legislature; correct?

1 A That, that is correct.

2 Q Do you know why your district lost
3 black population in this plan?

4 A I do not, but may I ask a question?
5 I don't see Asian population on either of these
6 documents. And especially in the 2011 map and
7 the 2012 redistricting, Asian population
8 accounts for a large number of the enrolled
9 students, and therefore the map that we're
10 looking at here in Exhibit 11 has a distinctly
11 increased Asian population. Whether it was
12 even measured in 20 -- in 2000 or not, I don't
13 know, according to these maps.

14 Q What specific area of District 3 had
15 increased Asian population when the plan was
16 adopted in 2011?

17 A District 3, 2011, yes, north, north
18 Gwinnett to add those schools to this map,
19 North Gwinnett, Peachtree Ridge, Duluth, all of
20 those have large Asian population.

21 Q Okay. And I'd like to refer you now
22 back to Exhibit 8. That was the overlay of the
23 2010 census on the 2000 era map that indicated
24 a Latino or Hispanic percentage of population
25 in your district of 24.9 percent, correct, in

1 Exhibit 8?

2 A Yes, that's right.

3 Q And --

4 A However, there's no Asian there.

5 Q I understand.

6 A Okay.

7 Q That's not my question. Referring
8 you to Plaintiff's Exhibit 10, which is the
9 final population statistics in this document
10 for the 2011 plan --

11 A Yes, ma'am.

12 Q -- the Latino or Hispanic population
13 in District 3 went down to 13.3 percent. Do
14 you see that?

15 A Right.

16 Q Do you know why Latino or Hispanic
17 population went down in your district?

18 A Well, one reason would be the Asian
19 population was added, and so those, the
20 African-American and the Latino populations,
21 would be going down with the increase of Asian
22 students to the district. And I think,
23 therefore, we would need a full display of
24 Asian in addition to what we have here with
25 black and, and Hispanic. That would be my

1 answer to you.

2 Q Was it your understanding that the
3 black population had moved out of your district
4 in some way in the 2011 plan or that population
5 was moved into adjoining districts?

6 A No, it wasn't moved out of my
7 district. But Mrs. Radloff in District 5 began
8 to be the representative of four of the schools
9 in Norcross, which changed the School Board
10 district, that there would be a very good
11 example of cluster.

12 So Mrs. Radloff began to represent
13 four schools in Norcross, and I began to
14 represent four schools in Norcross, whereas
15 previously, I'd had all eight schools, and
16 actually I think more -- I'd had all eight
17 schools in one end of the --

18 Q So is it your understanding that the
19 black population that was moved out of
20 District 3 went to Ms. Radloff's District 5?

21 A One would account for them in that
22 way certainly to investigate that.

23 Q And why wasn't the white population
24 moved into Ms. Radloff's district?

25 A Because these -- the population in

1 those schools was a good bit minority.

2 Q So was there intention to move
3 minority students to District 5 versus white
4 students?

5 A No. All the students would move.

6 Q So white --

7 A All students in those schools would
8 move.

9 Q White students or white population
10 was moved into Ms. Radloff's district?

11 A Yes.

12 Q And was it equal to the percentage
13 of black population that was moved into
14 Ms. Radloff's district?

15 MR. COFFMAN: I'm going to object.
16 There's no foundation for any of these
17 questions. We don't have any of the statistics
18 or the numbers. You're just asking this
19 witness to guess with nothing in front of her.
20 So I'm going to object. There's no foundation
21 for these questions.

22 Q You can answer.

23 A I don't have the information that I
24 would want to be able to make a response to
25 your question.

1 Q Was there any Asian-American
2 population moved into Ms. Radloff's district in
3 the 2011 redistricting?

4 A I do not know.

5 Q Was any of the Latino or Hispanic
6 population that was moved out of your district
7 moved into Ms. Radloff's district?

8 A I don't know. I'd have to get more
9 information.

10 Q And is it your contention that
11 minority population was moved out of your
12 district solely to keep school clusters
13 together in District 5?

14 A No, because it did just the
15 opposite: It separated them.

16 Q It separated them in what way?

17 A What had previously been a unified
18 district of eight schools which I represented
19 became a divided, divided into two clusters.
20 I'm sorry. Divided into two districts,
21 District 3 and District 5.

22 Q And what is your understanding of
23 the reasons for that?

24 A I don't know. We requested that of
25 the General Assembly and the -- in the

1 information that was transmitted to them about
2 the desires, if we had anything that could be
3 considered, and that was not considered. And
4 I, I point this out to you as this is an
5 example of how it did make a change.

6 Q And why -- what is your
7 understanding of the reasons why the
8 legislature did not keep the clusters together?

9 A I don't know.

10 Q Have you ever inquired why that --

11 A I have not.

12 Q Was that something important to you?

13 A It, it had importance, but I was
14 already representing parts of the district, and
15 I certainly -- my desire would not necessarily
16 reflect the community's.

17 Q What job duties or responsibilities
18 does -- strike that.

19 What job duties and responsibilities
20 did Superintendent Wilbanks have in 2011 with
21 respect to reviewing partisan data and partisan
22 performance in connection with redistricting?

23 A I don't know.

24 Q Would you expect that he would be
25 looking into partisan performance as part of

1 his duties and responsibilities as
2 superintendent of the Gwinnett County Public
3 School District?

4 A Well, I would expect it would be a
5 part of his knowledge of the constituents that
6 he serves.

7 Q Just general knowledge? Is that
8 what you're saying?

9 A Well, more specific knowledge as he
10 can glean it because he's making decisions that
11 affect hundreds of thousands of people.

12 Q And in what way is partisan
13 performance part of his duties and
14 responsibilities in connection with his
15 constituency?

16 A Because it's a part of the political
17 landscape.

18 Q And what do you expect him to do
19 with respect to partisan performance data?

20 A To be aware of it.

21 Q For what reason?

22 A Perhaps a better decision might be
23 made or a worse decision might be made.

24 Q Do you expect him to make decisions
25 along party lines?

1 A No. We're a School System that
2 serves all students, Republican and Democrat,
3 independent.

4 Q So how would partisan performance
5 affect his decision-making process?

6 A Help me understand what partisan
7 performance is.

8 Q Well, did Mr. Wilbanks have any
9 duties and responsibilities with respect to
10 identifying which party prevailed in elections
11 at the precinct level for the School Board?

12 A I don't know. I don't expect that
13 he did, but I don't know.

14 Q Do you know of any reason why
15 Superintendent Wilbanks would be inquiring
16 about which party won each precinct in a prior
17 election? How is that related to his duties
18 and responsibilities?

19 A Well, I think it --

20 MR. COFFMAN: Objection. Compound.
21 You can answer the question.

22 A I think it's very important for
23 Mr. Wilbanks to know as much as he can about
24 all the constituents in our community that is
25 in a community of 900,000 people, the voters to

1 be aware, not be, not be surprised by what's
2 happening in our district, in our School
3 System.

4 So I think it's incumbent upon him
5 to study areas of importance. And I'm not
6 telling you he studies -- that he does, but I'm
7 not telling you that he would study just one
8 political party. He would study them both.

9 He has communications of great
10 importance to all in our community in the same
11 way we educate all of the students in our
12 School System, not Democrat students, not
13 Republican students, not independent students.

14 Q What job duties and responsibilities
15 did Superintendent Wilbanks have with respect
16 to identifying the party -- political party
17 affiliation of voters living in Gwinnett County
18 School District -- strike that.

19 What job duties and responsibilities
20 did Mr. Wilbanks have with respect to
21 identifying the political party affiliation in
22 connection with redistricting of Board district
23 line?

24 MR. COFFMAN: Objection. First of
25 all, it assumes facts that are not in the --

1 not in evidence, and also she's answered this
2 question or attempted to several times already.

3 Q You can answer.

4 A I don't have any more information to
5 share.

6 (Whereupon a document was identified as
7 Plaintiff's Exhibit 18.)

8 Q I'd like you to turn in the exhibit
9 book to Plaintiff's Exhibit 18, please.

10 A Surely. Thank you. Yes, ma'am.

11 Q You've had a chance to review
12 Exhibit 18, and that's a couple of emails --

13 A Yes, I have.

14 Q -- correct? Starting with the last
15 page first --

16 A Correct.

17 Q -- there's an email from David
18 McCleskey to Greg Stanfield and Jorge Gomez
19 dated July 21st, 2011, at 7:44 a.m. Do you see
20 that?

21 A Yes, ma'am.

22 Q And the subject is "Request from
23 Mr. Wilbanks - please get a breakdown
24 (precinct) of the party political party
25 affiliation of the maps. We need this for our

1 next round of meetings." Do you see that?

2 A I do.

3 Q And then the email goes on to say,
4 "Precinct breakdown (which party carried the
5 precinct in the last election)." Do you see
6 that?

7 A I do.

8 Q Do you know why Mr. Wilbanks would
9 want to get a breakdown of the party, political
10 party, affiliation for Board of Education
11 redistricting maps?

12 A I do not know.

13 Q Did the Board of Education direct
14 him to undertake that inquiry?

15 A Not that I'm aware.

16 Q Would such an inquiry be within the
17 course and scope of his employment with the
18 Board of Education?

19 A Well, to the extent as we just
20 previously discussed that he would know as much
21 as he can about the political makeup of
22 Gwinnett County.

23 Q And the purpose, was that just to
24 have some general knowledge of the
25 constituency? Is that what you're saying?

1 A I think it would be very valuable.

2 Q And what specific purpose would he
3 have to inquire about the precinct breakdown in
4 terms of which party carried each precinct in
5 the last election in the course of
6 redistricting?

7 A I don't know.

8 Q And then turning to the first page
9 of Exhibit 18, at the bottom, the email from
10 Greg Stanfield dated July 21st, 2011, at
11 11:04 a.m. to Brian Knight in the Legislative &
12 Congressional Reapportionment Office, it was
13 courtesy copied to someone named Shantée El,
14 and it has the subject "Request from
15 Mr. Wilbanks - please get a breakdown
16 (precinct) of the party -- political party
17 affiliation of the maps. We need this for the
18 next -- for our next round of meetings."

19 And it states "Brian" -- I think he
20 meant Brian, it says Brain -- "or Shantée, good
21 morning. This following question is from our
22 superintendent. Do you happen to know how I
23 can obtain this information." Do you see that?

24 A I do.

25 Q Do you know why Greg Stanfield would

1 be making that inquiry to the Georgia
2 Congressional & legislative Reapportionment
3 Office?

4 A I do not know.

5 Q Would that have been outside the
6 course and scope of his duties and
7 responsibilities --

8 A I do not know.

9 Q -- as a School District employee?

10 A Excuse me. I didn't mean to do
11 that. I do not know.

12 Q Do you know if he was successful in
13 getting that information from the Georgia
14 Legislative & Congressional Reapportionment
15 Office?

16 A I do not know.

17 Q Did Mr. Wilbanks ever share that
18 information with the Board?

19 A Not that I'm aware.

20 Q What would you have expected him to
21 do with that information?

22 A I do not know.

23 Q After the redistricting in 2011,
24 were there any continuing discussions about
25 changing the election method for the Gwinnett

1 County Board of Education to nonpartisan
2 elections?

3 A There may have been. I don't
4 recall.

5 Q Did Mr. Wilbanks continue to work on
6 that issue?

7 A He may have. I don't know.

8 MS. HOUK: Marking next exhibit, 51.
9 (Whereupon a document was identified as
10 Plaintiff's Exhibit 51.)

11 THE WITNESS: Thank you.

12 MR. COFFMAN: Hey, Julie, just so
13 you know, this was marked as Exhibit 40
14 yesterday.

15 MS. HOUK: Oh, it was? Okay.

16 MR. COFFMAN: Just in case you want
17 to realign.

18 MS. HOUK: Well, we have a duplicate
19 then.

20 A Yes, ma'am.

21 Q That was an email from Alvin
22 Wilbanks to Carole Boyce, Louise Radloff, Dan
23 Seckinger, and then it was blind courtesy
24 copied to you and Dr. McClure; is that right?

25 A Correct.

1 Q Do you know why you and Dr. McClure
2 were included as blind courtesy copies on this
3 document rather than simply copied on the
4 document?

5 A That's the general way Mr. Wilbanks
6 communicates with us.

7 Q What do you mean that's the general
8 way he communicates with you?

9 A Dr. McClure has a private email
10 that's private, and I have a private email that
11 I don't extend to everyone.

12 Q Okay. And the subject is
13 Legislative Request?

14 A Yes, ma'am.

15 Q And it was sent on February 10th,
16 2016, at 8:26 p.m.?

17 A That's correct.

18 Q And it states, "Today David
19 McCleskey asked if we want -- wanted
20 legislation introduced to have School Board
21 elections to be nonpartisan." Is that --

22 A Correct.

23 Q -- what Mr. Wilbanks stated? Does
24 this refresh your recollection about whether
25 there were continuing considerations with

1 respect to having nonpartisan Board of
2 Education --

3 A Yes.

4 Q -- elections?

5 A Yes, very helpful.

6 Q Do you know who was behind this
7 effort in 2016?

8 A I don't.

9 Q Do you know why Representative Chuck
10 Efstration would have been involved in or
11 interested in the issue of nonpartisan Board of
12 Education elections in 2016?

13 A I do not.

14 Q After you received this email, did
15 you get any further inquiries from Mr. Wilbanks
16 or his staff about your position on nonpartisan
17 elections?

18 A Not that I'm aware.

19 (Whereupon a document was identified as
20 Plaintiff's Exhibit 52.)

21 Q I'll mark as Exhibit 52.

22 A Thank you very much. Thank you.

23 Q This was an email from Alvin
24 Wilbanks. It's unclear who it was sent to.
25 It's marked Private; is that right?

1 A Correct.

2 Q And it's dated February 12th, 2016,
3 at 4:39 p.m.?

4 A Correct.

5 Q And it states, "Heard from three
6 others. Mrs. Radloff prefers nonpartisan.
7 Mrs. Boyce does not -- does but is" -- strike
8 that.

9 "Ms. Boyce does but is concerned
10 about any public discussion at this time as it
11 could cause confusion, and Dr. Murphy is very
12 opposed and indicated she prefers partisan
13 elections."

14 Do you know why Mrs. Boyce had a
15 concern that this would cause confusion?

16 A I do not.

17 Q And in 2016, were you still very
18 opposed to changing to nonpartisan elections
19 because of the historical trend of partisan
20 elections?

21 A Yes, ma'am.

22 Q And in 2016, would you say that
23 District 3 was majority Republican?

24 A In 2016?

25 Q Yeah.

1 A I didn't have an election that year.
2 I was not opposed.

3 Q No, I know. I'm asking you a
4 question about whether you believed that in
5 2016 District 3 was majority Republican.

6 A Well, I would, I would say it was.

7 Q Did you ever learn that Ms. Radloff
8 changed her party affiliation when she ran for
9 reelection in District 5 in 2012?

10 A Yes.

11 Q How did you find out about that?

12 A At the Republican breakfast it was
13 announced she would run as a Democrat.

14 Q And who was at the Republican
15 breakfast when that announcement was made?

16 A The monthly attendees.

17 Q Was Ms. Radloff there?

18 A No.

19 Q What was discussed about her change
20 in party affiliation at the meeting?

21 A There was nothing discussed. The
22 Republicans had recruited an opponent. That's
23 the context it was in.

24 Q And did anyone express surprise that
25 she had changed party affiliation?

1 A I don't recall. Perhaps they did.

2 Q Were you surprised?

3 A I was not surprised.

4 Q Why not?

5 A Because she's a long-term community
6 leader, and if that's what she wanted to do to
7 run for office, I was eager for her to have
8 another four-year term.

9 Q Did you ever discuss with
10 Ms. Radloff her change in party affiliation --

11 A No, ma'am.

12 Q -- at any time?

13 A No.

14 Q She never told you anything about
15 her rationale for doing it?

16 A Not that I recall.

17 Q After Ms. Radloff changed party
18 affiliation, did you observe any change in her
19 political viewpoints?

20 A In terms of the School Board work?

21 Q Yes.

22 A No.

23 Q Did her change in party affiliation
24 to your knowledge have anything to do with the
25 increasing percentage of minority population in

1 her district, District 5?

2 A Yes. She's got a servant's heart,
3 and she wanted very much to serve the students
4 who were going to be in that reconfigured
5 district.

6 Q And how did that relate to her
7 change in party affiliation?

8 A There was some question about
9 whether a Democrat would win the district or
10 whether a Republican would win, and I -- you
11 would have to ask her for any more rationale.

12 Q You said there was some question
13 about whether a Republican or a Democrat would
14 win in a reconfigured district. Who was making
15 those comments or raising those questions?

16 A I inferred that.

17 Q Why did you infer it?

18 A Well, there was discussion in the
19 community.

20 Q What was the discussion in the
21 community?

22 A A number of newspaper articles.

23 Q What was the discussion in the
24 community?

25 A A prediction that now would be the

1 time for Democrats to win.

2 Q Would it be fair to say that the
3 majority of the Democrats in Ms. Radloff's
4 district were African-American or Latino?

5 A I believe that would be correct.

6 Q Was Mr. Wilbanks making any
7 investigation into the partisan preference of
8 voters in the course of the redistricting
9 process in 2011 to determine whether
10 Ms. Radloff would be potentially successful if
11 she continued to be a Republican in District 5?

12 A Not that I'm aware.

13 Q Do you know if he was making that
14 inquiry with respect to partisan performance
15 because of any concern that he or any of the
16 Board members had about whether other Board
17 members would be successful in running as
18 Republicans in their district?

19 A Not that I'm aware.

20 Q When Mr. Wilbanks said that he was
21 looking into partisan preference and partisan
22 performance in the course of the redistricting
23 process, what is your understanding about how
24 that assessment would be made by him?

25 A I do not know.

1 Q Do people register by party in
2 Georgia to vote?

3 A Yes.

4 Q Don't they -- when do they register
5 by party?

6 A There's always a deadline for an
7 election, and it would be by that time. Once
8 you're registered though, you don't have to
9 register for every election.

10 Q Correct. But there's no space on
11 the voter registration form in Georgia that
12 includes party affiliation, is there?

13 A I don't know.

14 Q There's a space for voluntary
15 disclosure of a voter's race; correct?

16 A Please restate the question. I want
17 to be sure I answer it.

18 Q When people register to vote in
19 Georgia, they have the option to disclose their
20 racial identity on the voter registration form;
21 correct?

22 A I thought you were talking about
23 political party identification.

24 Q Well, I'm talking about something
25 else now. I'm talking about racial

1 identification on voter registration.

2 A I'm not aware of that. Since I
3 registered to vote, I'm not aware of that.

4 Q And it's your belief that there's a
5 space on the form for party affiliation?

6 A You register with a party.

7 Q Okay. And your information is based
8 on what?

9 A My experience.

10 Q Do you know what's meant by the S as
11 in Sam, B as in boy, L as in Larry, C as in
12 cat? Is that a committee or a group of --

13 A SMBLC?

14 Q SBLC.

15 A I'm not familiar with that.

16 (Whereupon a document was identified as
17 Plaintiff's Exhibit 53.)

18 Q Showing you what I have marked as
19 Exhibit 53.

20 A Thank you. Thank you.

21 Q Exhibit 53 is an email from Berney
22 Kirkland to a number of people dated December
23 12th, 2016, at 4:40 p.m.?

24 A Correct.

25 Q And it says Recap of Meeting With

1 Gwinnett Legislative Delegation as a subject;
2 is that right?

3 A Yes. Yes, ma'am.

4 Q And does this refresh your
5 recollection of what SBLC means?

6 A No, it doesn't.

7 Q Do you know who any of the
8 individuals are --

9 A I do.

10 MR. COFFMAN: Make sure she finishes
11 her question.

12 THE WITNESS: Oh, I'm so sorry.
13 Reading the names. I'm sorry. Thank you.

14 Q Yes. The individuals to whom the
15 email was sent, who are you familiar with
16 there?

17 A Bill Russell, Dan Kaufman, Carla
18 Carraway, David Seago, Jim Maran, Bill McCargo,
19 Sean Murphy, Mike Levensgood, David Snell, Cathy
20 Nichols, Matt Wyatt -- I'm sorry, Hyatt, Raymer
21 Sale, Tammy Shumate, Terri Jondahl, Randy
22 Dellinger, Laura Levett.

23 I -- I know those names through the
24 Gwinnett Chamber of Commerce, but I'm not sure
25 what SC -- SBLC stands for.

1 Q Are they primarily members, except
2 for Mr. Wilbanks and Berney Kirkland, are they
3 primarily members of the Chamber of Commerce?

4 A I would think so.

5 Q Did you attend the legislative
6 session with the local delegation that's
7 referred to in this document?

8 A I believe I did.

9 Q Did you hear Mr. Wilbanks speak
10 about the proposal of moving to nonpartisan
11 races for School Board?

12 A Yes.

13 Q What did he say about that?

14 A Basically, what is here.

15 Q Well, what -- it says he did a good
16 job of explaining why the change is being
17 requested now and outlining the benefits of
18 moving to nonpartisan races for the School
19 Board.

20 A Well, in the previous document that
21 you shared with us, those would have been the
22 points discussed.

23 Q What did he say about the rationale
24 for moving toward a nonpartisan system for
25 School Board races?

1 A I don't remember the specifics.
2 There was a document that you gave us about --
3 here it is. There was a document that you gave
4 us about the School Board members.

5 Q That were in favor or against the --

6 A Yes. I don't see that.

7 Q -- partisan election? Is that what
8 you're referring to?

9 A Right.

10 Q That was Exhibit 52.

11 A Okay. Yeah. I see that. I don't
12 recall what his reasons were, but I thought we
13 had discussed that earlier.

14 Q What did he say during this
15 meeting --

16 A I don't recall.

17 Q -- about the reasons?

18 A I don't recall what he said that was
19 to be -- could you --

20 Q Do you recall the gist of what he
21 referred to as being the reasons for changing
22 to the nonpartisan system?

23 A I do not.

24 Q Do you remember anything about what
25 he outlined were the benefits of moving to a

1 nonpartisan system?

2 A I don't --

3 MR. COFFMAN: She said she doesn't
4 know like three times.

5 Q It say "there were few questions
6 from the delegation members." What were the
7 questions that you recall?

8 A I don't recall.

9 Q Following the local delegation
10 meetings annually in December, does
11 Mr. Wilbanks usually put out a document
12 summarizing what occurred during that session?

13 A Not that I'm aware. There is a 2017
14 legislative priorities that is submitted to
15 them for their review at that meeting, but I
16 don't recall anything coming afterwards.

17 Q Had you seen Exhibit 53 before
18 today?

19 A I have not.

20 (Whereupon a document was identified as
21 Plaintiff's Exhibit 54.)

22 Q Showing you what I have marked as
23 Exhibit 54.

24 A Thank you so much.

25 Q You've had a chance to review

1 Exhibit 54?

2 A Yes, ma'am.

3 Q And this is an email from Amy Pratt
4 to David McCleskey cc Berney Kirkland; is that
5 right?

6 A Correct.

7 Q And the subject is Board Elections
8 Meeting?

9 A Correct.

10 Q The date is February 1st, 2017, at
11 10:33 a.m.?

12 A Yes, ma'am.

13 Q Who is Amy Pratt?

14 A She is Mr. Wilbanks' executive
15 administrative assistant.

16 Q And the email states,
17 "Mr. McCleskey, per your request, the following
18 date is available on Mr. Wilbanks' calendar the
19 week of February 6th to meet with
20 Representative Scott Hilton on Board
21 elections."

22 Do you know why Mr. Wilbanks would
23 be meeting with Representative Scott Hilton on
24 Board elections in 2017?

25 A I do not.

1 Q Was that within the scope of his
2 duties and responsibilities as superintendent
3 of the Gwinnett County School District?

4 A I would think so.

5 Q In what way?

6 A He's a member -- Representative
7 Hilton is a member of the Gwinnett delegation,
8 and it would be a continuing method of
9 communication, and he's a new member. He was
10 elected in the place Mr. Rice had held.

11 Q Were you aware that Mr. Wilbanks
12 would be meeting with Representative Scott
13 Hilton on Board elections in 2017?

14 A I was not.

15 Q Did Mr. Wilbanks ever tell the Board
16 that he planned to meet with any members of the
17 local delegation about Board elections in 2017?

18 A Not that I'm aware.

19 Q You say that Representative Hilton
20 was a newly elected member of the legislature?

21 A Correct.

22 Q Was that in 2016?

23 A Correct.

24 (Whereupon a document was identified as
25 Plaintiff's Exhibit 55.)

1 Q I'm showing you what's been marked
2 as Exhibit 55.

3 A Thank you so much.

4 Q Have you had a chance to review --

5 A I have.

6 Q -- Exhibit 55? This was an email
7 from Alvin Wilbanks to the five members of the
8 Board of Education; correct?

9 A Yes, ma'am.

10 Q Dated February 15th, 2017?

11 A Correct.

12 Q And it states, "Attached is a
13 nonpartisan bill drafted by Representative
14 Scott Hilton for the Gwinnett Board of
15 Education." Is that right?

16 A Correct.

17 Q Do you know why Representative Scott
18 Hilton was drafting a bill for nonpartisan
19 elections --

20 A I --

21 Q -- of the Board of Education?

22 A I do not know.

23 Q Do you know why Mr. Wilbanks was
24 sending it to you and the other four Board
25 members?

1 A For information purposes.

2 Q Did Mr. Wilbanks get back to any of
3 the Board members to your knowledge with his
4 thoughts about the bill?

5 A Not to my knowledge.

6 Q It states, "I will read tonight and
7 get back with you with my thoughts in the
8 morning"?

9 A Correct.

10 Q You don't recall ever hearing from
11 him on that?

12 A I do not, not about nonpartisan.

13 Q After the 2011 redistricting plan
14 was enacted, was Simpson Elementary School
15 still in your school district?

16 A Yes, ma'am.

17 (Whereupon a document was identified as
18 Plaintiff's Exhibit 56.)

19 Q Showing you what's been marked as
20 Exhibit 56.

21 A Thank you.

22 Q You've had a chance to review
23 Exhibit 56?

24 A Yes, ma'am.

25 Q And it appears to indicate that a

1 meeting was set up between Mr. Wilbanks and
2 Scott Hilton to discuss Board elections at the
3 Simpson Elementary School on February 8th of
4 2017; is that right?

5 A Correct.

6 Q Did you attend that meeting?

7 A No.

8 Q Do you know why they were meeting at
9 Simpson Elementary School?

10 A I did not.

11 Q Did Mr. Wilbanks ever report back to
12 the Board about what he discussed with
13 Representative Hilton at this meeting?

14 A Not that I'm aware of.

15 (Whereupon a document was identified as
16 Plaintiff's Exhibit 57.)

17 Q Showing you what I've marked as
18 Exhibit 57.

19 A Thank you so much.

20 Excuse me.

21 Q You've had a chance to review it?

22 A Yes, ma'am. Thank you.

23 Q I want to direct your attention to
24 the second paragraph in the section under the
25 portion that starts Representative Efstration

1 where it begins "Chuck, thank you for your
2 leadership."

3 A Yes, ma'am.

4 Q It states there that -- strike that.
5 It says, "Chuck, thank you for your
6 leadership in supporting our request for
7 nonpartisan Board elections. Your
8 understanding of the timing and context of our
9 current litigation status is also very much
10 appreciated. We both know this is the right
11 thing to do, and I look forward to the
12 opportunity of speaking with you personally and
13 expressing my and our Board's appreciation for
14 your support."

15 Do you see that?

16 A I see it.

17 Q What was the litigation status that
18 he was referring to?

19 A I don't know.

20 Q Did it have anything to do with the
21 case that you're here for testifying about
22 today?

23 A I don't know.

24 Q What concern was there about timing
25 in reference to nonpartisan elections?

1 A I don't know.

2 MR. COFFMAN: Object to the form of
3 the question. It assumes facts not in
4 evidence.

5 Q When Mr. McCleskey stated, "We both
6 know this is the right thing to do," do you
7 know what he was referring to?

8 A I do not.

9 Q Did the Board appreciate what he had
10 done in reference to nonpartisan elections in
11 terms of Representative Efstration?

12 A I don't know.

13 Q Do you know why Mr. McCleskey would
14 say he wanted to express the Board's
15 appreciation for his support?

16 A I don't know.

17 (Whereupon a document was identified as
18 Plaintiff's Exhibit 30.)

19 Q I'd like you to take the exhibit
20 book, please, and refer to Exhibit 30.

21 A Thank you.

22 Q And excuse me. I'm sorry. It's
23 actually in the loose exhibits --

24 A Oh, these?

25 Q -- not in the book. Yes.

1 A Okay.

2 Q It should be in order.

3 A Thank you. 30? Got it. Yes,
4 ma'am.

5 Q Do you recognize the names of the
6 people that signed that document?

7 A David McCleskey, Jorge Gomez, Greg
8 Stan -- excuse me -- Greg Stanfield.

9 Q What job duties and responsibilities
10 did Mr. Gomez have with respect to Legislative
11 & Congressional Reapportionment Office
12 meetings?

13 A I don't know that in specific
14 regard, but his responsibilities with the
15 School System are to maintain understanding of
16 the bills that are being proposed, passed, and
17 failed.

18 Q Were you aware that Mr. McCleskey,
19 Mr. Stanfield, and Mr. Gomez were meeting with
20 the Legislative & Congressional Reapportionment
21 Office?

22 A No, ma'am.

23 (Whereupon a document was identified as
24 Plaintiff's Exhibit 32.)

25 Q I'd like you to turn to Exhibit 32,

1 which is also in those loose --

2 A Thank you.

3 Q -- exhibits. That's a series of
4 emails, and I want to direct your attention to
5 the first email. Who is that from?

6 A David.

7 Q McCleskey?

8 A Correct.

9 Q And who is it directed to?

10 A Brian.

11 Q Brian Knight with the
12 Congressional -- with the Legislative &
13 Congressional Reapportionment Office, and it
14 states, "Brian, many thanks for your help.
15 Know your schedule is tight and full. We look
16 forward to continued partnership in all aspects
17 of reapportionment, David."

18 Do you see that?

19 A I do.

20 Q Is it your understanding that the
21 Gwinnett County Board of Education has a
22 continued partnership in all aspects of
23 reapportionment with the Legislative &
24 Congressional Reapportionment Office?

25 A I don't know that.

1 Q Is it your understanding that any of
2 the staff have a continued partnership in all
3 aspects of reapportionment?

4 A I don't know that.

5 Q Do you know why David McCleskey
6 would have said that to Brian Knight at the
7 Legislative & Congressional Reapportionment
8 Office on June 16th, 2011?

9 A No, ma'am.

10 Q Is it contrary to your understanding
11 about how the reapportionment process works
12 with respect to the drawing of Board member
13 district lines to have the staff so involved in
14 that process with the legislature?

15 MR. COFFMAN: I'm going to object to
16 the form of the question. It assumes facts not
17 in evidence. It's argumentative.

18 Q You can answer.

19 A I don't know.

20 Q I marked a series of maps that I'll
21 hand you in a second. They go from Exhibit 58
22 to 64.

23 MR. COFFMAN: Did you say 64?

24 MS. HOUK: It goes 58 to 64.

25 A Thank you. Thank you very much.

1 Thank you. Thank you very much. Thank you.
2 Thank you.

3 Q You've had a chance to review the
4 maps?

5 A Yes, ma'am.

6 (Whereupon a document was identified as
7 Plaintiff's Exhibit 58.)

8 Q I'd like to start with the map
9 that's marked Exhibit 58.

10 A Yes, ma'am.

11 Q Have you ever seen this plan or this
12 map before?

13 A It's not familiar to me.

14 Q Does this map show your school
15 clusters in District 3?

16 A It shows 161,971 students, but it
17 doesn't tell me what year.

18 Q That's not my question. My question
19 is: Does this map in Exhibit 58 show the
20 school clusters?

21 A Oh, yes.

22 Q And this map -- strike that.
23 You don't know who prepared this
24 map?

25 A I don't.

1 Q You've never seen it before?

2 A Not that I'm aware of.

3 Q Do you know what the purpose of this
4 map was?

5 A I don't.

6 (Whereupon a document was identified as
7 Plaintiff's Exhibit 59.)

8 Q Let's turn to Exhibit 59.

9 A Uh-huh (affirmative). Were you
10 waiting for me, ma'am?

11 Q Yes.

12 A Oh, I'm so sorry.

13 Q You've had a chance to review
14 Exhibit 59?

15 A Yes, I do.

16 Q Have you ever seen that map before.

17 A Not that I'm aware.

18 Q Does that map show school clusters?

19 A Yes, it does.

20 Q And this map which is entitled 7
21 District Proposal 4 at the top?

22 A Correct.

23 Q Does it show any of the school
24 clusters in your district being shared with any
25 other district?

1 A I, I can't tell. I don't have my
2 magnifying glasses on.

3 Q Okay.

4 A But it certainly represents what --
5 a good bit of what we've known about
6 District 3.

7 Q Okay. And with respect to the
8 eventual 2011 plan that was enacted by the
9 legislature, what school clusters did
10 District 3 wind up sharing with other
11 districts?

12 A Oh, Collins Hill, one school; North
13 Gwinnett, four schools; Lanier, four schools;
14 Norcross, four schools; Peachtree Ridge, the
15 whole cluster; and Duluth, the whole cluster.

16 Q What do you mean by the whole
17 cluster?

18 A All the schools, elementary, middle,
19 and high schools, feeding into the one high
20 school.

21 Q They're shared with other districts?

22 A No, just those two. Peachtree Ridge
23 and Duluth are whole districts.

24 Q Okay.

25 A The other four or five are partial.

1 (Whereupon a document was identified as
2 Plaintiff's Exhibit 60.)

3 Q Got it. If you would take a look at
4 Exhibit 60.

5 A Yes, ma'am.

6 Q Have you seen this map previously?

7 A Not that I recall.

8 Q Does this map show the school
9 clusters as well?

10 A Yes, it does.

11 Q Can you tell by looking at this map
12 whether any of them are shared with other
13 districts in this proposal?

14 A I can't.

15 (Whereupon a document was identified as
16 Plaintiff's Exhibit 61.)

17 Q If you would take a look at
18 Exhibit 61.

19 A Yes, ma'am.

20 Q Have you seen this map previously?

21 A Not that I recall.

22 Q Does this map show school clusters?

23 A Yes, it does -- oh, it shows school
24 districts and within them clusters, I'm sure.

25 Q And does this map show any clusters

1 being shared with other districts?

2 A I can't tell.

3 (Whereupon a document was identified as
4 Plaintiff's Exhibit 62.)

5 Q Turning to Exhibit 62.

6 A Correct.

7 Q Have you seen this map before?

8 A No, not that I'm aware.

9 Q Does it appear to reflect school
10 clusters in District 3?

11 A It will have some school clusters in
12 District 3.

13 Q Can you tell from this map whether
14 any are shared with any districts?

15 A I can't.

16 (Whereupon a document was identified as
17 Plaintiff's Exhibit 63.)

18 Q Turning to Exhibit 63, have you seen
19 this map before?

20 A Not that I'm aware of.

21 Q Can you tell if there's any shared
22 school clusters in this map with respect to
23 District 3?

24 A I can't tell.

25 (Whereupon a document was identified as

1 Plaintiff's Exhibit 64.)

2 Q And then looking at Exhibit 64, have
3 you seen this map before?

4 A No, ma'am.

5 Q Can you tell from this map whether
6 any of the school clusters --

7 A Please excuse me.

8 Q -- share other districts?

9 A I can't tell. Please excuse me.

10 Q Have you ever seen at any time any
11 plan that was drawn by anyone employed by the
12 Gwinnett County Public School District for the
13 2011 redistricting that kept all of your school
14 clusters whole in your district?

15 A No.

16 Q Are you aware of any school member
17 who has any school clusters -- strike that.

18 Are you aware of any district in the
19 five member districts of the School Board where
20 any district doesn't share clusters with any
21 other district?

22 A No.

23 Q Would that be the same with respect
24 to the districting that occurred after the 2000
25 census as well?

1 A Yes, it would be.

2 Q Since you've been on the School
3 Board, are you aware of any district that did
4 not share school clusters with other districts?

5 A No.

6 MS. HOUK: This would probably be a
7 good time for a short break.

8 MR. COFFMAN: Okay.

9 THE WITNESS: Excellent.

10 THE VIDEOGRAPHER: Going off the
11 video record at 4 -- excuse me, 3:50 p.m.

12 (Proceedings in recess, 3:50 p.m. to
13 4:09 p.m.)

14 THE VIDEOGRAPHER: We're back on the
15 video record. This is the beginning of video
16 file number four. The time is 4:09 p.m.

17 Q You understand you're still under
18 oath?

19 A Yes, ma'am. Thank you.

20 Q And, Dr. Murphy, are you familiar
21 with the term achievement gap?

22 A Yes, I am.

23 Q And what's your understanding of
24 what that means?

25 A My understanding is that there are

1 measures of student performance that can tell
2 if a student is on grade level or not in terms
3 of their development, especially their academic
4 development.

5 And it's a way of -- it came, I
6 believe, from the No Child Left Behind
7 legislation -- a way of assessing students in
8 terms of whether their education meets their
9 needs and whether the schools they're attending
10 are schools that will help them achieve those
11 needs.

12 Q To your understanding, is there
13 currently an achievement gap in the Gwinnett
14 County Public School District between minority
15 students' and white students' performance?

16 MR. COFFMAN: I'm going to object.
17 That question is vague on the term minorities.

18 Q You can answer.

19 A I would, I would agree. I would
20 need to know more.

21 Q What is your understanding of what
22 the achievement gap is currently in the
23 Gwinnett County Public School District?

24 A I would not be able to give you
25 exact measures, but to say to you that there is

1 a difference between the assessment scores of
2 students who are from different ethnic groups:
3 Caucasian, Asian, Hispanic, African-American.

4 Q And are there also gaps with respect
5 to the performance of students that do not have
6 English as their first language or have limited
7 English proficiency?

8 A Yes.

9 Q And what if anything is being done
10 in the Gwinnett County Public School System
11 currently to close the achievement gap?

12 A Well, it is one of our major
13 commitments. It has been for a number of
14 years. But it's major. I would say that we
15 have 15 or 20 programs of an academic nature
16 for the students and for their parents to make
17 certain that all students who are in our public
18 schools have an opportunity and can achieve at
19 the level of their ability.

20 Q And is the achievement gap observed
21 with disparities in graduation rates?

22 A Yes.

23 Q And is it also observed in
24 disparities with respect to students who are
25 being retained?

1 A Yes.

2 Q Has the Board adopted any policies
3 with respect to closing the achievement gap?

4 A Yes. We, we have adopted policies,
5 especially the ones that I spoke of generally,
6 the 15 or 20 programs that we have. Those are
7 all aimed toward making certain that we have
8 opportunities for all students to achieve in
9 our schools to the very best of their ability.

10 Q Have you heard from constituents
11 about concerns they have regarding the gap in
12 achievement for minority students?

13 A I hear, I hear from different
14 minority communities about their interests in
15 the achieve -- in closing the achievement gap.
16 They're not -- their interests are not all the
17 same, depending on who their student is and
18 what their student circumstance is.

19 So it's not with one voice that I
20 hear about closing the achievement gap from one
21 minority community. It's three voices at
22 least, and especially since you speak of
23 English speakers of other language, we'll have
24 a fourth voice.

25 Q And since you've been on the

1 Gwinnett County Public School Board, is it your
2 impression that the school's doing all it can
3 to close the achievement gap?

4 A We're doing a great job, but we can
5 always do more.

6 Q What are some examples of areas
7 where the School District could do more to
8 close the achievement gap?

9 A Well, I think that given the
10 resources that we have available and the
11 programs that have borne the test of time.
12 We're a School System that many others in the
13 country look to to answer this very question.

14 We can always have more resources.
15 We could always have a greater influence. But
16 it's nothing by design that we are not able to
17 do that. We've made great progress in the
18 years that we've been working on this.

19 Q Has the Board made any effort to
20 increase the funding to the Gwinnett County
21 Public School District as a result of its
22 desire to close the achievement gap?

23 A Yes, we have, especially from the
24 State. I had mentioned earlier in our
25 discussion this morning about the State being

1 our major partner in the funding of schools and
2 the funding of education programs.

3 The federal government is the one
4 that's responsible for funding the free and
5 reduced lunch program. That's Title I, and
6 right now 57 percent of the students in our
7 School System are in the category of free and
8 reduced lunch, and that's a federal term. The
9 federal funding is also responsible for English
10 speakers of other language.

11 Those two programs -- I'm sorry, the
12 IDEA program, not federal -- not English
13 speakers of another language, the special
14 education program. So the federal government
15 is a partner with us, but we continue to
16 advocate for more funding in both of those
17 programs. Of course, we're one of 50 states,
18 but we're one of 50 states with increasing
19 populations in both those categories.

20 And we also advocate with our State
21 for increased funding to help us close the
22 achievement gap. And we've been, we've been
23 the beneficiaries, as have other school systems
24 in the state, in the last four to five years of
25 increased funding, but we also are a district

1 and one of several -- one of many in the state
2 that lost funding during the economic downturn
3 of 2008 and on.

4 Q What percentage of the School
5 District's funding comes from local taxes?

6 A Local taxes is our major source of
7 funding. It's actually our only source of
8 funding. Right now, it's 60 percent, and the
9 State is 40 percent.

10 Q Have you advocated to raise local
11 taxes to pay for programs that will close the
12 achievement gap?

13 A We certainly have advocated to
14 increase funding. We haven't focused on
15 increase in taxes. We've advocated, especially
16 with the State, when we present our budget
17 program to the State and to the General
18 Assembly. Those are the --

19 This takes us back to our earlier
20 discussion about what our work is with the
21 General Assembly: to have them help us fund
22 the programs that we know will help our
23 students to close the achievement gap.

24 Q As a candidate for the School Board,
25 did you ever advocate against raising local

1 taxes to pay for school programs?

2 A Advocate against? No. Against
3 raising local taxes? No.

4 Q Yes.

5 A No, no.

6 Q Have any other members of the Board
7 who are serving currently run on a platform
8 where they were against raising local taxes to
9 pay for school programs?

10 A Not that I'm aware.

11 Q Has the Board taken a position with
12 respect to raising federal taxes to pay for
13 educational programs?

14 A Our Board has not taken a position.

15 Q Have you taken a position on raising
16 federal taxes to pay for school programs --

17 A Well --

18 Q -- in any of your --

19 A Excuse me.

20 Q -- candidacies for the School Board?

21 A Every year I go to Washington DC as
22 a member of the Board, of the Georgia School
23 Board Association, and we meet with our two
24 senators and with all of the -- all of the
25 legislative -- the legislative delegations to

1 the federal government, to the House.

2 We meet with our representatives
3 there, and we advocate for increased funding.
4 And we are especially appreciative that our two
5 senators meet with us and that by individual
6 legislative district we have very good response
7 from our US House, House of Representatives, to
8 meet with us and to keep those communication
9 lines open.

10 Q Well, have you personally advocated
11 for the raising of federal taxes to pay for
12 school education in Gwinnett County?

13 A Personally, I have not.

14 Q Do you know what the Gwinnett County
15 Public -- Republican Party's position is on
16 raising local taxes to pay for education?

17 A There is no -- I'm not aware.

18 Q Are you aware of any position that
19 the national Republican Party has with respect
20 to raising federal taxes to pay for educational
21 programs?

22 A I'm not aware.

23 MR. COFFMAN: I'm sorry. In
24 Gwinnett County? Or just anywhere in the
25 world?

1 MS. HOUK: In general --

2 MR. COFFMAN: Anywhere in the
3 country?

4 MS. HOUK: -- as it affects every
5 School District.

6 MR. COFFMAN: Okay. That's fine.

7 Q Are you aware of any concerns that
8 Gwinnett County School District is not
9 competitive in terms of recruiting teachers to
10 the District because of low pay and benefits?

11 A No. I'm, I'm just the opposite.
12 I'm quite aware of the great position we are in
13 to recruit teachers and especially minority
14 teachers.

15 Q And what efforts are being made
16 specifically to recruit more minority teachers?

17 A Well, we have a very active
18 recruiting program that provides equal effort
19 to recruit minority teachers, African-American,
20 Hispanic, and Korean teachers, a very active
21 effort.

22 We have, through our human resources
23 department and through our office of
24 communications, a link to over 80 publications
25 and communications to advertise jobs for

1 Gwinnett County. And those are primarily
2 African-American, historically black colleges
3 and universities such as the two that I have
4 worked at.

5 They are bilingual publications and
6 bilingual opportunities for Spanish teachers
7 and French teachers. African-American
8 sororities and fraternities are of very great
9 benefit to us in our recruitment efforts. The
10 churches in Gwinnett County have been a great
11 source of opportunity and the pastors.

12 United Ebony Society is an
13 organization in Gwinnett County that has
14 specifically set its goal on increasing the
15 number of principals and assistant principals
16 in Gwinnett County Public Schools, and I've
17 been very active with that group. I'm a
18 dues-paying member since 1999.

19 The Unity Group is another group
20 that has been extremely successful in helping
21 us recruit African-American teachers, and we
22 found our, our ranks in all of these groups,
23 African-American minority, Asian, to increase
24 greatly since 1995 when this effort was
25 begun -- 1999 when this effort was specifically

1 begun.

2 Q How many minority teachers have been
3 hired in the last year into the Gwinnett County
4 Public School District?

5 A I don't have that -- I don't have
6 that number for you. But I do know -- I'll try
7 to -- let me just let it go. I can't give you
8 by specific minority categories.

9 Q Who has that data?

10 A Dr. Linda Anderson is our associate
11 superintendent of human resources and
12 Dr. Frances Davis, associate superintendent for
13 human resources.

14 Q And since you've joined the Board,
15 it's your impression that there's been a large
16 improvement in minority teacher hiring?

17 A Yes.

18 Q And what do you mean by that? How
19 do you measure the level of improvement?

20 A Well, the numbers have increased as
21 our student body has increased, and they've --
22 they've worked to be increased as we've had
23 more Asian students, more Hispanic students,
24 and more African-American students.

25 (Whereupon a document was identified as

1 Plaintiff's Exhibit 65.)

2 Q I'd like to show you a document that
3 I've marked as Exhibit 65.

4 A Thank you.

5 MR. COFFMAN: What number?

6 THE WITNESS: Oh, I'm sorry. 65.

7 MR. COFFMAN: Thank you.

8 A Yes, ma'am.

9 Q This has got a Bates stamp of School
10 District 018558, and it's an email from Sloan
11 Roach to David Wickert, a reporter at the
12 Atlanta Journal Constitution, and copied to
13 Alvin Wilbanks, dated August 11th, 2016?

14 A Yes, ma'am.

15 Q Do you know David Wickert?

16 A I do not.

17 Q I want to direct your attention to
18 the bottom portion of the email where it says
19 School Administrators. Do you see that?

20 A Yes, ma'am.

21 Q And it states -- this, again, is in
22 August of 2016 -- that there were 50 out of 139
23 principals in the District who were minority;
24 is that right?

25 A That's correct.

1 Q Does that appear correct to you?

2 A That does appear correct.

3 Q And there were 238 of 570 assistant
4 principals who were minority. Does that appear
5 correct to you?

6 A Yes, ma'am.

7 Q And that -- I'm sorry. Let me go
8 back. There's 238 of 570 assistant principals
9 are minority, and it breaks it down: 199
10 African-American, 4 Asian, 27 Hispanic, 7
11 multiracial, and 1 American Indian. Does that
12 appear correct to you?

13 A Yes, ma'am.

14 Q And what -- do you know what the
15 term certified staff means?

16 A It means those people who are in
17 professional levels.

18 Q And there's a chart at the bottom of
19 the page that has a certified staff number
20 of -- strike that.

21 It has a number of certified staff
22 by ethnicity; is that correct?

23 A Correct.

24 Q And then it's got the student
25 population by ethnicity; is that correct?

1 A Correct.

2 Q And I want to direct your attention
3 to the first column where it's got Ethnicity
4 Hispanic. Do you see that?

5 A I do.

6 Q And it states there's 516 certified
7 staff in 2016 to 50,783 Hispanic students; is
8 that right?

9 A Yes.

10 Q You consider that to be a
11 significant improvement over what those levels
12 were?

13 A Yes.

14 Q And why is that?

15 A Because they started at a very low,
16 low level.

17 Q You don't consider this to be a low
18 level?

19 A Well, it's progress every year, and
20 it's very important to us that we have
21 representative faculty members in the
22 classrooms to correspond with the number of
23 students who would iden -- who do identify with
24 them. All students do identify with them, but
25 specifically of the same ethnic background.

1 Q And why is that an important
2 consideration to you?

3 A There's any number of studies that
4 students do best in schools where they have
5 role models, those who -- whose lives they
6 might emulate, those who find virtues in a
7 student's -- corresponding with the students'
8 fine virtues and the faculty members.

9 Q Directing your attention to the
10 column where it says Black, do you see that?

11 A Yes, ma'am.

12 Q And the certified staff number is
13 2,470; correct?

14 A Correct.

15 Q And this, again, is going back to
16 August of 2016?

17 A Correct.

18 Q And then it's got the student
19 population of black students at 55,392; is that
20 right?

21 A Correct.

22 Q Do you consider that to be a high
23 level of certified staff compared to the black
24 student population?

25 A I would say the same thing that I

1 said to you about ethnic Hispanics, that it's
2 great improvement over what we had when we
3 started this initiative to intentionally
4 recruit and employ faculty members, assistant
5 principals, and principals who would serve as
6 role models to students in their schools and in
7 students across the, across the county.

8 Q And in the evaluations that are
9 prepared with respect to Superintendent
10 Wilbanks, is there any evaluation of his
11 success or nonsuccess with respect to
12 recruitment of minority --

13 A No.

14 Q -- certified staff?

15 A That's not one of the specific
16 items, but I believe I mentioned to you that
17 the major -- that the number one area in our
18 evaluation is managing the faculty and staff of
19 the School System, and this would certainly
20 fall under the area of that in his
21 responsibilities.

22 Q Are you familiar with the term
23 highly qualified teachers?

24 A I am.

25 Q What does that term mean to you?

1 A It would be -- it's my recollection
2 highly qualified was a category that came from
3 the federal legislation No Child Left Behind,
4 and that meant that the teacher would have
5 degrees or certification, primarily degrees, in
6 the subject area that they're teaching. So,
7 for example, my degrees would be in English,
8 and I would therefore be considered a highly
9 qualified teacher.

10 Q And are you familiar with how highly
11 qualified teachers are assigned to schools
12 within the Gwinnett County --

13 A I am not.

14 Q -- Public School System?

15 A I am not.

16 Q Are you familiar with the Georgia
17 governor's school achievement website?

18 A I, I don't refer to it frequently.
19 I'm sorry.

20 Q Well, maybe not frequently, but you
21 generally are aware of it?

22 A I'd be -- I think that would be very
23 fair to say.

24 (Whereupon a document was identified as
25 Plaintiff's Exhibit 19.)

1 Q If you would turn to Exhibit 19 in
2 the --

3 A Okay.

4 Q -- exhibit book, please.

5 A Thank you.

6 Q And I'll represent to you that this
7 was downloaded by myself from the Georgia
8 governor's school achievement website, and it
9 is a breakdown of high-poverty schools and
10 low-poverty schools and the percentages of
11 non-highly qualified teachers assigned to those
12 schools in the Gwinnett County School District
13 between 2010 and 2016.

14 A Yes, ma'am.

15 Q Are you familiar with what the term
16 high-poverty schools means?

17 A That would -- it would relate to the
18 free and reduced lunch enrollment of the
19 school.

20 Q In low-poverty schools, what does
21 that term mean? Would those be non-Title I
22 schools?

23 A Yeah. And free and reduced lunch
24 comes from the Title I program.

25 Q Do you know why in the Gwinnett

1 County Public School District there was a
2 consistently higher percentage of classes
3 taught by non-highly qualified teachers in
4 high-poverty schools in the District?

5 A No, I don't.

6 Q Are there any high-poverty schools
7 in Gwinnett County School District to your
8 knowledge that are attended by majority white
9 students?

10 A I don't know that, but I'd be
11 reasonably certain that there are.

12 Q Can you provide one example?

13 A Well, I know that Norcross High
14 School is a high-poverty school. It's a Title
15 I high school. And it has -- last year, it had
16 24-percent Caucasian enrollment. That would be
17 one -- my example to you of the high schools
18 that I'm aware of.

19 Q It had a 24-percent white
20 enrollment?

21 A Yes.

22 Q And what was the other percentage of
23 the demographic breakdown of the students?

24 A 32-percent African-American,
25 30-percent Hispanic, 24-percent Caucasian, and

1 10-percent Asian. I hope those come close to a
2 hundred percent.

3 Q Well, I think maybe you
4 misunderstood my question. My question was:
5 Are there any high-poverty schools in the
6 Gwinnett County School District that are
7 attended by majority white students versus
8 majority minority students?

9 A Majority white students?

10 Q Yes.

11 A Yes. That would be Norcross High
12 School.

13 Q Well, you gave me a 24-percent
14 attendance of white students. How is that a
15 majority of the student population?

16 A My understanding was the question
17 had to do with do majority white students
18 attend high-poverty schools.

19 Q Correct.

20 A And that would be --

21 Q Well, do they comprise the majority
22 of the students attending? Let me --

23 A Okay.

24 Q -- rephrase the question. Are there
25 any high-poverty schools in the Gwinnett County

1 Public School District where there's a
2 high-poverty school that's attended by
3 primarily or majority white students?

4 A I don't know that. I'd have to make
5 a reference.

6 (Whereupon a document was identified as
7 Plaintiff's Exhibit 21.)

8 Q If you wouldn't mind in the book
9 turning to Exhibit 21, please.

10 A Surely.

11 Q It's actually 21, Exhibit 21.

12 A Oh, dear.

13 Q That's okay.

14 A I need my magnifying glasses.

15 Q You might need it for this exhibit.

16 A I really need it now.

17 Q Can you read that?

18 A I can.

19 Q Okay.

20 A Yes, ma'am.

21 Q And I'll represent that this was
22 also downloaded from the Georgia governor's
23 school achievement website for the Gwinnett
24 County School District. Directing your
25 attention to the year 2015 to '16, do you see

1 that?

2 A I do.

3 Q And then there's a percentage of the
4 graduation rate of black students there. Do
5 you see that --

6 A I do.

7 Q -- at 77.2 percent?

8 A I do.

9 Q Do you consider that to be a problem
10 for the School District, or is that a
11 successful high graduation in your view?

12 A I think until we have all of our
13 students graduating in four years that it will
14 be a problem.

15 Q And would the same apply to the
16 67.8-percent graduation rate of Hispanic
17 students --

18 A Yes.

19 Q -- that is reflected in this chart?

20 A Yes.

21 Q And there's also -- excuse me -- a
22 63.6-percent graduation rate for American
23 Indian/Alaskan native students?

24 A Yes, ma'am.

25 Q Is that a satisfactory --

1 A No.

2 Q -- graduation rate in your view?

3 A No.

4 Q Do you know why there's such a
5 disparity now existing in 2015-2016 school year
6 for these graduation rates?

7 MR. COFFMAN: I'm going to object to
8 the extent your question is based on this
9 exhibit. You've misrepresented what your own
10 exhibit shows, but you can answer the question
11 if you're able to.

12 A No, I don't.

13 Q Is it your understanding this chart
14 reflects a graduation of black students in the
15 year 2015 to '16 at 77.2 percent?

16 A Yes, it is.

17 Q And does this chart also represent a
18 graduation rate of Hispanic students of 67.8
19 percent in the calendar year 2015 to '16?

20 A Yes, it does.

21 Q And does it represent a graduation
22 rate of 63.6 percent in that same year for
23 American Indian/Alaskan native?

24 A Yes, it does.

25 (Whereupon a document was identified as

1 Plaintiff's Exhibit 22.)

2 Q I'd like you to turn to Exhibit 22
3 in the book.

4 A Thank you.

5 MR. MURPHY: I'm going to move to
6 the back. I can't hear.

7 THE WITNESS: I'm sorry?

8 MR. MURPHY: Better for hearing.

9 THE WITNESS: Oh, okay. Thank you.

10 Q You've had a chance to look at
11 Exhibit 22?

12 A Let me take a few moments.

13 Yes, ma'am. Go ahead.

14 Q And, again, this data was downloaded
15 from the Georgia governor's school achievement
16 website for the Gwinnett County Public School
17 District. Directing your attention to the row
18 which states Limited English Proficient, do you
19 see that?

20 A Yes, I do.

21 Q And for the 2015-2016 school year,
22 it indicates a 46.7 percent graduation rate for
23 students with limited English proficiency; is
24 that right?

25 A Correct.

1 Q Is that a satisfactory graduation
2 rate in your view?

3 A Well, I would give you the same
4 answer I gave you about the other chart. We
5 are always aiming toward a hundred percent
6 graduation of our students, and until we get
7 there, we're not satisfied.

8 Q And is there any oversight that the
9 Board has concerning Superintendent Wilbanks in
10 reference to the continued achievement gap and
11 graduation rates for minority students and
12 limited English proficient students?

13 A That would be a part of our
14 evaluation of his management of the School
15 District, and so, yes, I would say that that
16 definitely comprises a part of his
17 responsibility.

18 Q Has the Board ever stated in any of
19 Superintendent Wilbanks's evaluations that it
20 had any concern about this disparity in
21 graduation rates for minority students and
22 limited English proficient students?

23 A No, that has not been.

24 Q Are you familiar with the Schott
25 Foundation? That's S-H-O-T-T.

1 A I am.

2 Q What is your understanding of what
3 the Schott Foundation is?

4 A The Schott Foundation has a great
5 interest in black male students, and it has
6 commended Gwinnett County in recent
7 publications for the work that we've done to
8 increase opportunities for black male students.

9 Q Did the Schott Foundation commend
10 Gwinnett County in its 2015 report?

11 A I, I can't make that --

12 Q Did you ever review the 2015 Schott
13 Foundation report, the 50 State Report on
14 Public Education and Black Males?

15 A I, I can't say specifically that I
16 reviewed -- is it the 2015?

17 Q Yes.

18 A No, I can't say that I did.

19 (Whereupon a document was identified as
20 Plaintiff's Exhibit 66.)

21 Q Let's have marked as Exhibit 66 the
22 2015 Schott Foundation report. And, Andy,
23 you're going to have to share with your
24 client --

25 A Sure.

1 Q -- because I don't have enough
2 copies.

3 MR. DEMPSEY: Is this something that
4 is available online and I can gave my copy to
5 Andy?

6 MS. HOUK: Yes, it is.

7 THE WITNESS: Sir, could you be so
8 kind to share with my husband?

9 MR. DEMPSEY: Well, I gave up mine.

10 MR. MURPHY: It's okay. Don't worry
11 about it.

12 THE WITNESS: I'll share with him.

13 MR. DEMPSEY: Sorry.

14 THE WITNESS: Thank you.

15 MR. DEMPSEY: I'll find it on the
16 Internet though.

17 THE WITNESS: You're very kind.

18 Thank you.

19 A Yes, ma'am. Please.

20 Q Do you know whether the Schott
21 Foundation's report concerning black male
22 graduation rates in the Gwinnett County School
23 District was more favorable in earlier
24 iterations of the report than the 2015 version?

25 A I haven't read the 2015, so I can't.

1 I'm sorry.

2 Q You've read prior reports?

3 A I have.

4 Q Is there any reason you didn't
5 review the 2015 report?

6 A I know there is no reason.

7 Q The Gwinnett County Public School
8 District is not in the top performing school
9 districts for closing the achievement gap, is
10 it?

11 MR. COFFMAN: Are you looking at a
12 particular page?

13 MS. HOUK: I'm just asking the
14 question.

15 MR. COFFMAN: Oh.

16 A I'm sorry. I haven't found it.

17 MR. COFFMAN: Top -- I'm sorry, the
18 question -- I'm going to object. It's vague.
19 I don't even know what -- top performing
20 compared to what and according to whom?

21 Q Is it your contention that the
22 Gwinnett County Public School District is in
23 the top ten percent of schools that are closing
24 the achievement gap for black male students?

25 A I did not --

1 MR. COFFMAN: Object to the form of
2 the question. It's vague and it has no --
3 there's no reference point for the witness to
4 be able to answer that question.

5 Q You can answer.

6 A I did not say, at least I didn't
7 mean to say, that we were in the top ten
8 percent in the country.

9 Q I'm not saying that you did say
10 that. I'm asking the question. Is it your
11 contention that the Gwinnett County Public
12 School District is within the top ten percent
13 of the country in closing the achievement gap
14 for black --

15 A Absent --

16 Q -- male students?

17 A Absent the Schott report?

18 Q Correct. Just --

19 A No, I don't make that contention. I
20 don't know the answer.

21 Q If you would turn to page 26 of this
22 exhibit, the Schott report.

23 A Yes, ma'am.

24 Q Which is Exhibit 66.

25 A Yes, ma'am.

1 Q I'm referring to the bottom entry
2 for Gwinnett County where it indicates that the
3 male graduation rate in the Gwinnett County
4 Public School District in the school years of
5 2011 to 2012 was 50 percent. Do you see that?

6 A Yes.

7 Q Do you consider that to be a good
8 graduation rate for black male students in the
9 School District?

10 A No, following what I had said
11 earlier.

12 Q And the report indicates an
13 achievement gap between black male students and
14 white male students of 13 percent, is that
15 correct, on page 26?

16 A That's correct. 13 percent, right.

17 Q Do you know what an acceptable
18 percentage of an achievement gap is in terms
19 of --

20 A I do not.

21 Q Do you have any understanding about
22 whether the gap in achievement for black
23 students in the Gwinnett County Public School
24 District is a product of the failure of the
25 School District to hire more African-American

1 or other minority teachers?

2 A I, I don't know.

3 Q Do parents of minority children in
4 the School District raise concerns with you
5 about the achievement gap?

6 A Parents of minority students?

7 Q Yes.

8 A In different ways. The
9 African-American parents have been especially
10 concerned about black males, the very topic of
11 this report, and they've been very concerned
12 about the dropout rates.

13 For the Asian parents, their concern
14 has been how to get their students into the
15 most competitive colleges, what to do now in
16 the high school and what to do in preschool and
17 grade school.

18 And the Hispanic parents have wanted
19 for the parents -- for the schools to provide
20 English education training, training to speak
21 English for the parents, and making certain
22 that their students could master English. And
23 I found that to be different in Asian and
24 African-American constituencies.

25 Q Would you say that that's also true

1 for children who have parents who have limited
2 English proficiency?

3 A The third, what Hispanic parents
4 have as a concern?

5 Q Yes.

6 A Yes.

7 Q And would the same apply to Asian --

8 A No.

9 Q -- American parents who -- where the
10 parents have limited English proficiency?

11 A No, that's not been my experience.

12 Q Is it your contention that the
13 Gwinnett County Public School District has been
14 responsive to the concerns of the minority
15 community with respect to the increase in white
16 supremacist activity and racial hostilities in
17 the School District?

18 MR. COFFMAN: Objection to the form
19 of the question. It's vague.

20 A I have no opinion.

21 MR. COFFMAN: Those are undefined
22 terms.

23 A I have no opinion.

24 Q You have no opinion?

25 A I have no opinion.

1 Q Has the Board of Education done
2 anything to enact any policies to respond to
3 concerns by minority students about racial
4 incidents on campus?

5 A We have not. We have not.

6 Q Do you intend to as a Board?

7 A I don't know.

8 Q Are you familiar with Brian Long,
9 the principal of Dacula High School?

10 A I am.

11 Q Did you become aware of an incident
12 in October of 2016 involving a racial slur and
13 some incidents that caused him to cancel a pep
14 rally?

15 A No, I'm not familiar.

16 Q Did you ever become aware of
17 Principal Long's concerns that current events
18 around -- that were going on in the country and
19 in the community were impacting students at
20 Dacula High School related to racial issues?

21 A I am not.

22 Q If there were racist incidents on
23 campus, how does that get to the Board's
24 attention?

25 A Mr. Wilbanks has communication that

1 he shares with us, school incidents.

2 Q Did Mr. Wilbanks ever share an
3 incident that occurred at Dacula High School in
4 October of 2016 --

5 A I can't --

6 Q -- related to a racist incident that
7 occurred there?

8 A I can't recall.

9 Q Did it ever come to the Board's
10 attention that there were concerns raised by
11 black students about a protest they intended to
12 undertake by wearing black T-shirts to school
13 in reference to a racial incident that occurred
14 there?

15 A Not that I'm aware.

16 Q Did you ever become aware of an
17 incident in the Gwinnett County Public Schools
18 where a teacher gave a math assignment to
19 middle schoolers relating to slaves?

20 A I have heard of it. I don't know
21 the details of it.

22 Q How did you hear about it?

23 A I would expect it was one of our
24 school incident reports from Mr. Wilbanks.

25 Q Did you hear about it from any other

1 source?

2 A No.

3 (Whereupon a document was identified as
4 Plaintiff's Exhibit 28.)

5 Q If you will turn to Exhibit 28 in
6 the exhibit book, please.

7 A Surely.

8 Q You've had a chance to review the
9 article?

10 A I'm --

11 Q You're still reviewing?

12 A I'm sorry.

13 Q I'm sorry.

14 A I've got a couple of paragraphs.

15 MR. COFFMAN: Hey, while she's
16 reading that, what was the number for the
17 Schott report? 65?

18 MR. DEMPSEY: That would be 66.

19 MR. COFFMAN: 66.

20 A Yes, ma'am.

21 Q Does that refresh your recollection
22 generally about the --

23 A Yes.

24 Q -- slave homework assignment I was
25 referring to?

1 A Yes, ma'am.

2 (Whereupon a document was identified as
3 Plaintiff's Exhibit 67.)

4 Q I'd like to show you what I'm
5 marking as Exhibit 67.

6 A Thank you so much. Yes, ma'am.

7 Q Did you receive that email?

8 A Not that I'm aware.

9 Q Do you know who Gerda Dale is?

10 A Yes. She was Mr. Wilbanks' previous
11 executive administrative assistant.

12 Q And this email appears to be sent
13 from MySchoolBoard? That's that --

14 A That's correct.

15 Q -- internal messaging system --

16 A Correct.

17 Q -- we discussed? And it was sent by
18 Gerda Dale to Berney Kirkland. Is that what it
19 shows?

20 A Correct.

21 Q On January 10th of 2012?

22 A Correct.

23 Q But you don't recall ever receiving
24 this?

25 A No, I don't.

1 Q And the email is from an individual
2 who was concerned about the slave homework
3 assignment; correct?

4 A Correct.

5 Q If you had taken any action and had
6 seen this, what would you have done?

7 A I, I, I really don't have an
8 opinion.

9 Q Did you ever learn about how that
10 incident was ultimately handled by the School
11 District?

12 A No.

13 Q Do you know if the teacher left the
14 employ of the School District?

15 A I do not know.

16 Q So you don't have an opinion about
17 whether it was handled appropriately or not?

18 A That's correct.

19 (Whereupon a document was identified as
20 Plaintiff's Exhibit 69.)

21 Q I want to show you what's marked as
22 Exhibit 69.

23 A Thank you very much.

24 MR. DEMPSEY: Did we skip 68?

25 MS. HOUK: Coming back to it.

1 MR. DEMPSEY: Gotcha.

2 Q You've had a chance to review
3 Exhibit 69?

4 A Yes, ma'am.

5 Q At the top it's entitled
6 Superintendent's Update, January 10th, 2012; is
7 that right?

8 A That's correct.

9 Q Is this the type of superintendent's
10 update you referred to earlier where you
11 thought you received information about this
12 incident?

13 A This is printed out, yeah. It would
14 sometimes be called Superintendent's Briefings,
15 but yes.

16 Q Would this have been the update that
17 you reviewed when you learned about this
18 incident, to your knowledge?

19 A It appears to be, but I couldn't say
20 for sure.

21 Q And were you aware that the
22 principal of the school where the incident
23 occurred wrote the statement that appears on
24 the bottom of the first page of Exhibit 69 that
25 goes on to the second?

1 A I was, I was not.

2 Q You were not aware?

3 A I was not.

4 Q Did you read about the incident in
5 the newspaper before you --

6 A Yes, I did.

7 Q -- read that article today?

8 A No. No, I did not.

9 (Whereupon a document was identified as
10 Plaintiff's Exhibit 70.)

11 Q Show you what's been marked as
12 Exhibit 70.

13 A Thank you.

14 THE WITNESS: Sir, may I trouble you
15 for a Post-it note? That's great. Just one.
16 Thank you.

17 Q There's a couple in case you need
18 more.

19 A Thank you.

20 MS. SWEENEY: What was 68? I don't
21 know.

22 MS. HOUK: 70.

23 THE WITNESS: Here's 70.

24 MR. COFFMAN: I've got it.

25 A I can't read it.

1 Q I'll try and help you. This was
2 produced by the School Board in discovery.
3 It's Bates stamped 01 -- 018473.

4 A Thank you.

5 Q And this is the format it was
6 produced to the Plaintiffs' counsel. And it
7 has an indication underneath the looks like a
8 website screenshot. It says Sloan Roach,
9 Executive Director of Communications and Media
10 Relations, Gwinnett County Public Schools.

11 And at the top of the email, it
12 says, "Mr. Wilbanks, I wanted to make sure you
13 saw that the Gwinnett STOPP" -- that's all
14 caps, S-T-O-P-P -- "folks posted about the
15 rehiring of Jose DeJesus. Does not look like
16 it has been viewed by many folks, but good to
17 know what they are saying."

18 Do you know what Sean Roach is?

19 A Yes, I do.

20 Q Sloan Roach?

21 A Sloan.

22 Q I'm sorry.

23 A No problem.

24 Q And who is, who is Sloan Roach?

25 A She's the director of our

1 communications program for the School System.

2 Q Okay. And the article that is in
3 the screenshot is from the Gwinnett STOPP page,
4 and it states, "Gwinnett County Public Schools
5 is tone deaf and insensitive when it comes to
6 black students. They waited for the
7 controversy to die down and retired the
8 principal and created a culture that provided
9 this deep racial insensitivity.

10 "Need we remind everyone that
11 Superintendent Wilbanks also stated the special
12 education is the albatross of the School
13 System." And then it's got an excerpt from the
14 slave school assignment.

15 Do you know why Ms. Sloan would make
16 a comment to the effect that it was good to
17 know people were not looking at this posting on
18 a wide basis?

19 A I don't.

20 Q Do you know anything about the
21 rehiring of Jose DeJesus?

22 A I do not.

23 Q Do you know why Mr. DeJesus left the
24 District or was --

25 A I do not.

1 Q Are you familiar with the
2 organization by the name of Gwinnett STOPP,
3 S-T-O-P-P?

4 A I am.

5 Q What's your knowledge about that
6 organization?

7 A I hope I got the acronym right.
8 School To Prison Pipeline.

9 Q Yes.

10 A And a group of parents and perhaps
11 even more community members worked to develop a
12 program to keep the community informed about
13 what they saw as the connection between a
14 student's dropping out of school for one reason
15 or another and, and the student's
16 incarceration.

17 Q And doesn't the Gwinnett STOPP also
18 focus upon school disciplinary processes that
19 lead to incarceration and that's what's --

20 A I would --

21 Q -- considered to be the school to
22 prison pipeline?

23 A I would agree.

24 Q Have you spoken with Marlyn Tillman,
25 the head of Gwinnett StoPP at any time?

1 A I have not individually.

2 Q Has she spoken at School Board
3 meetings?

4 A Yes, she has.

5 Q And what kinds of concerns has she
6 raised at School Board meetings?

7 A The concern about the impact on
8 black males, the concern --

9 Q Sorry.

10 A That's plenty.

11 Q What was the concern about -- what
12 was the impact she was referring to?

13 A That black males do not graduate in
14 large numbers, that there's a corresponding
15 dropout rate for black males. They don't find
16 a meaningful way to employment, and they find
17 their way to prison.

18 Q And has Ms. Tillman also complained
19 about the disparity in the arrest of black male
20 students in the Gwinnett County Public School
21 District?

22 A Not that I recall specifically.

23 Q Have you ever become aware that
24 there is a disparity between the number of
25 black males who are arrested by the Gwinnett

1 County Public School Police and white students?

2 A I am not aware of that.

3 Q Does the School Board receive any
4 reports from the Gwinnett County School Police
5 Department about the percentage of arrests they
6 make by race or gender?

7 A No, not that I know of.

8 (Whereupon a document was identified as
9 Plaintiff's Exhibit 23.)

10 Q If you wouldn't mind turning in the
11 exhibit book to Exhibit 23, please, that's in
12 the book.

13 A Oh, in the book. 23?

14 Q Yes, please.

15 A Okay. Yes.

16 MR. COFFMAN: That goes with the
17 court reporter.

18 THE WITNESS: Thank you, Love.
19 Okay. Got it. Thank you so much.

20 MR. COFFMAN: You're welcome.

21 THE WITNESS: Please excuse me.
22 Excuse me.

23 MR. MURPHY: Bless you.

24 THE WITNESS: Thank you.

25 A Yes, ma'am.

1 Q Have you seen this document before?

2 A I have never seen it.

3 Q Has Superintendent Wilbanks reported
4 to the Board the arrest data and demographics
5 that are shown in this document?

6 A No.

7 Excuse me. Thanks.

8 Q Directing your attention to the
9 chart that appears under the heading Arrest By
10 Race (Race Defined By DOJ UCR Standards), do
11 you see that?

12 A Yes, I do.

13 Q And that chart reflects that there
14 were 273 arrests made of white persons by the
15 Gwinnett County School Police Department in
16 2016; is that right?

17 A Correct.

18 Q And then there were 476 black
19 persons arrested by the School District Police?

20 A Correct.

21 Q One American Indian/Alaskan Native?

22 A Yes, ma'am.

23 Q And 14 Asian/Pacific Islanders?

24 A Yes, ma'am.

25 Q Do you know why the number of

1 arrests for black persons by the School
2 District Police is much higher than it is for
3 white --

4 A I don't.

5 Q -- persons? Has the Board made any
6 inquiry to determine whether there's any kind
7 of racial profiling or implicit bias in the
8 Gwinnett County Public School District that
9 leads to higher arrest rates of minority
10 persons over white?

11 A No.

12 Q Did you ever hear of an incident
13 occurring in April of 2017 in which the
14 Gwinnett StoPP organization complained that the
15 Gwinnett County -- the Gwinnett County School
16 District Police assaulted a student and used
17 excessive force to the point the student was
18 rendered unconscious?

19 A I don't recall.

20 Q Is that -- assuming an incident like
21 that occurred, would you expect Superintendent
22 Wilbanks to have brought that to the Board's
23 attention?

24 A I would certainly think so.

25 Q And would that be in the format of

1 one of these Superintendent Updates?

2 A I would think so.

3 Q Where is the Lanier school?

4 A Lanier High School and Lanier Middle
5 School are in different clusters.

6 Q Where is the middle school?

7 A The middle school is in Lanier, but
8 they're -- when I say -- forgive me. I didn't
9 say that right.

10 They're in the same cluster, but
11 they're represented by two different School
12 Board members. So I have four schools in the
13 Lanier cluster, the middle school.
14 Mr. Seckinger has four schools in the Lanier
15 cluster, the high school.

16 Q So you have the Lanier Middle School
17 in your district?

18 A Yes, ma'am.

19 Q Was that true in 2016 also?

20 A Yes.

21 Q Did you ever learn about an incident
22 in which it was alleged that a Lanier teacher
23 engaged in an alleged racist rant against black
24 students there?

25 A No.

1 (Whereupon a document was identified as
2 Plaintiff's Exhibit 26.)

3 Q If you wouldn't mind looking in the
4 exhibit book, Exhibit 26, please.

5 A Surely.

6 Thank you. Thank you.

7 Q Does that refresh your recollection
8 about whether you knew about this incident
9 before today?

10 A I still don't recall that.

11 Q Is this the type of incident you
12 would have expected Superintendent Wilbanks to
13 inform the Board about through one of the
14 Superintendent's Updates?

15 A Yes.

16 Q Did you ever become aware of any
17 incidents at Archer High School last year
18 involving racist comments and remarks and the
19 waving of Confederate flags?

20 A No.

21 Q Did you ever become aware of an
22 incident in which black students at Archer High
23 School engaged in any protest activity because
24 of their concerns about racism on campus?

25 A I would have to say -- correct my

1 last statement. I'm sure that Mr. Wilbanks
2 informed us about Archer High School, but I
3 don't really know the details.

4 Q Did you ever ask Mr. Wilbanks for
5 details about the incident?

6 A No, I did not.

7 Q What's the School Board's policy on
8 students bringing Confederate flags onto
9 campus?

10 A We have no policy.

11 Q Did Mr. Wilbanks ever explain to you
12 what if any action was taken by the
13 administration in response to that incident?

14 A No, ma'am, not that I'm aware.

15 Q Did the Board ever ask Mr. Wilbanks
16 for an explanation?

17 A Not that I'm aware.

18 Q Did any parents of students complain
19 to the Board about that incident at Archer High
20 School?

21 A Not that I'm aware, but it may have
22 been another School Board member to whom they
23 would have made contact.

24 Q What district is Archer High School
25 in?

1 A I think it's in District 1,
2 Mrs. Boyce, but I'm not certain.

3 (Whereupon a document was identified as
4 Plaintiff's Exhibit 68.)

5 Q I want to show you what's been
6 marked as Exhibit 68.

7 A Thank you.

8 MR. COFFMAN: Do you have any idea
9 how much longer you --

10 MS. HOUK: Not very long. A couple
11 of minutes.

12 THE WITNESS: 68.

13 MR. COFFMAN: Oh, 68. Okay. Good.

14 A Yes, ma'am.

15 Q This document was produced in
16 discovery by the School Board. It bears Bates
17 stamp School District 018209 through 018212.
18 Are you familiar with this document?

19 A I am not.

20 Q Do you know what it represents?

21 A I do not.

22 Q You've never seen this document
23 before today?

24 A I have not.

25 (Whereupon a document was identified as

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Plaintiff's Exhibit 71.)

Q Showing you what's been marked as Exhibit 71.

A Thank you.

Q Have you had a chance to review it?

A I did.

Q This appears to include an email from you to Alvin Wilbanks with the subject Urgent - Please Share Widely; is that correct?

A No.

Q I'm referring to the section just under the portion written by Mr. Wilbanks that says from Mary Murphy. Is that you?

A Correct.

Q And is that your Morehouse School email --

A Correct.

Q -- address?

A Uh-huh (affirmative).

Q And it says to Alvin Wilbanks; correct?

A Yes, but I don't see where it says Please Share Widely Urgently.

Q Where it says Subject right under where your email address appears. It says

1 Subject FW: URGENT - Please Share Widely!
2 Right here.

3 A Thank you. I didn't see that. All
4 right.

5 Q And you wrote to Mr. Wilbanks, "I
6 received this message today from Don Speaks"?

7 A Correct.

8 Q Who is Don Speaks?

9 A He's a colleague at Morehouse School
10 of Medicine.

11 Q What is his race?

12 A African-American.

13 Q It says, "He came to the Mentoring
14 Dinner and those Ms. Falk"?

15 A Correct.

16 Q And what is the Mentoring Dinner?

17 A That's a dinner we have annually for
18 now 225 students, middle school and high
19 school, who have mentors, they are the mentees,
20 and 525 African-American men who serve as their
21 mentors.

22 And I invited Mr. Speaks to attend
23 that dinner because I thought that he -- his
24 wife at the time was a member of the DeKalb
25 Board of Education. And I thought that he

1 might be interested to see the kind of work we
2 were doing with mentoring of black males.
3 That's a concern that he and I share.

4 Q And what information did you receive
5 from Mrs. Falk that you wanted to share widely?

6 A I don't know that it was Mrs. Falk,
7 and I don't see the message from Mr. Speaks,
8 but that he had sent a letter. My recollection
9 it was highly commending us for our mentoring
10 outreach program. I don't see that, though, if
11 I read this correctly.

12 Q Do you know why you mentioned
13 Mrs. Falk in this email?

14 A Because Mr. Speak knows Mrs. Falk,
15 and he knew her to be my opponent in the School
16 Board race.

17 Q And Mr. Wilbanks wrote to Jorge
18 Gomez originally at the top portion of the
19 email, "Also let Steve know as well as the area
20 superintendents." Do you know what he was
21 referring to?

22 A I do not.

23 Q And it says, "Another thing is that
24 we may want to start a log like we did with the
25 Branch lady from Mason ES so it will be there

1 when we need it, Thanks." Do you know what he
2 was referring to?

3 A I do not. I'm sorry. I don't.

4 Q Do you know who the Branch lady is?

5 A I do not.

6 Q Is Mason ES an elementary school?

7 A Yes, it is.

8 Q And what district is Mason?

9 A Mine.

10 Q Did you ever become aware of an
11 incident where a log was started in connection
12 with something that happened at Mason
13 Elementary School?

14 A No.

15 (Whereupon a document was identified as
16 Plaintiff's Exhibit 72.)

17 Q We're getting to the very end.
18 Marking Plaintiff's Exhibit 72, a document
19 entitled Growth in Gwinnett County Public
20 Schools prepared by Department of Planning,
21 Gwinnett County Public Schools.

22 A Thank you very much.

23 MR. COFFMAN: What number is that
24 exhibit?

25 THE WITNESS: Oh, forgive me. 72.

1 A Yes. I'm ready.

2 Q Have you seen this document
3 previously?

4 A I have.

5 Q And in what -- strike that.

6 Under what circumstances have you
7 seen this before?

8 A I believe Mr. Wilbanks shared this
9 with our School Board.

10 Q And do you know what the purpose of
11 this document was?

12 A I don't.

13 Q Is it essentially a report on
14 population growth and other demographic data --

15 A Correct.

16 Q -- in the district?

17 A Correct.

18 Q And would you say the information
19 contained in this report is accurate?

20 A To the best of my, my knowledge, it
21 is. I have no reason to dispute it.

22 Q And turning to the Bates stamped
23 page in Exhibit 72 School District 018199.

24 A 18199. Okay. Yes, ma'am.

25 Q And going to the column labeled

1 School Year all the way to the bottom for the
2 2016 to '17 school year.

3 A Yes.

4 Q And the title of this page is GCPS
5 Ethnic History; is that right?

6 A Correct.

7 Q And it appears to indicate that as
8 of the 2016-'17 school year the Asian
9 population of the -- is this the District or
10 the school student population?

11 A I don't know.

12 Q Where it says Gwinnett County Public
13 School Ethnic History, is that referring to the
14 student population?

15 A I expect it would. Remember a
16 little earlier today I gave you these numbers.

17 Q Right. So 10 percent is about
18 accurate for the Asian student population?

19 A Correct, correct.

20 Q 32 percent is accurate, you would
21 say, for the 2016-'17 school year for black or
22 African-American population?

23 A Yes, ma'am. Correct.

24 Q 30 percent for Latino?

25 A Correct.

1 Q 24 percent for white?

2 A Yes.

3 Q And four percent mixed or others?

4 A Exactly.

5 Q And historically, as shown in this
6 chart, the black or African-American population
7 has almost, but not quite, doubled since
8 2001-2002?

9 A Correct.

10 Q And the Hispanic/Latino population
11 has tripled since 2001 to 2002?

12 A Yes, ma'am.

13 Q And the white population has gone
14 down by about half; isn't that right?

15 A Correct.

16 Q And turning to Bates page -- excuse
17 me.

18 A Sure.

19 Q 018200.

20 A Forgive me. That title -- that
21 number again?

22 Q 018200. It's the page following
23 what we were just looking at.

24 A Okay. Yes, I've got it.

25 Q That would be Asian percentage by

1 cluster?

2 A Got it.

3 Q So you referred earlier to the
4 Peachtree Ridge cluster as being within
5 District 3?

6 A Yes, ma'am.

7 Q And that has, at least as of October
8 2016 when it appears this chart was produced,
9 that have the highest Asian --

10 A Correct.

11 Q -- population of all the clusters in
12 the district?

13 A That's right.

14 Q What district is North in?

15 A It's, it's my district, District 3.

16 Q I mean, the cluster is in your
17 district?

18 A District 3.

19 Q And what about Park View?

20 A No. That's District 4 for
21 Dr. McClure.

22 Q And is it Brockwood?

23 A Brookwood.

24 Q Brookwood? What district is that
25 cluster in?

1 A Dr. McClure, I believe.

2 Q And Duluth, is that in yours?

3 A Mine, uh-huh (affirmative).

4 Q Yeah. Okay. And then turning to
5 the next page, which is Bates 018201.

6 A Yes, ma'am.

7 Q And this says Black/African-American
8 Percentage By Cluster; is that correct?

9 A Correct.

10 Q What district is this South cluster
11 in?

12 A That would be Dr. McClure.

13 Q And how about Shiloh? Is that
14 also --

15 A The same.

16 Q -- Dr. McClure?

17 A Right.

18 Q Is Grayson in --

19 A Mrs. Boyce.

20 Q Mrs. Boyce.

21 A Uh-huh (affirmative).

22 Q And then the Central cluster, what
23 district is that in?

24 A Mr. Seckinger.

25 Q And Archer I think we talked about a

1 minute ago. That's Dr. McClure?
2 A No. I believe it's Mrs. Boyce.
3 Q Mrs. Boyce. Okay.
4 A I'm not sure, but I believe it is.
5 Q And Dacula, do you pronounce it
6 Dacula?
7 A Dacula.
8 Q Dacula. What district is Dacula?
9 A Mrs. Boyce.
10 Q Turning to the next page, which is
11 Bates 018202.
12 A Correct.
13 Q The Hispanic/Latino Population By
14 Cluster. Which district is Meadow?
15 A Meadow Creek is in Mrs. Radloff's
16 district, District 5.
17 Q And is Berkmar in Dr. McClure's
18 district?
19 A That's in Mrs. -- yes, Dr. McClure.
20 Q And Norcross would be in --
21 A My district.
22 Q -- yours. And Discovery, what
23 district is that?
24 A I believe that's -- I'm embarrassed
25 I don't know.

1 Q And Duluth, that would be you?

2 A That's mine, uh-huh (affirmative).

3 Q And Central?

4 A Mr. Seckinger.

5 Q And Collins Hill?

6 A Mr. Seckinger.

7 MS. HOUK: Just give me one minute
8 to look at my notes.

9 THE WITNESS: Certainly.

10 THE VIDEOGRAPHER: Would you like me
11 to go off video?

12 MS. HOUK: Why don't we just take a
13 couple minute quick break.

14 THE VIDEOGRAPHER: Going off the
15 video record at 5:38 p.m.

16 (Proceedings in recess, 5:38 p.m. to
17 5:48 p.m.)

18 THE VIDEOGRAPHER: We're back on the
19 video record at 5:48 p.m.

20 (Whereupon a document was identified as
21 Plaintiff's Exhibit 39.)

22 Q Dr. Murphy, if you'd turn to
23 Exhibit 39, which I believe are in the loose
24 group of exhibits.

25 MR. COFFMAN: You said 39?

1 MS. HOUK: 39.

2 THE WITNESS: Thank you so much.

3 Q And this is an Atlanta Journal
4 Constitution article?

5 A Yes, ma'am.

6 Q Prior to showing you Exhibit 39,
7 were you aware that a teacher in Gwinnett
8 County Public School System had given sixth
9 graders a homework assignment to draw a Nazi
10 mascot?

11 A No.

12 Q And you hadn't seen the news
13 articles about this before today?

14 A I had not.

15 Q Did Superintendent Wilbanks send any
16 kind of Superintendent Update that mentioned a
17 teacher giving a Nazi homework assignment?

18 A Not that I recall.

19 Q Would it have been your expectation
20 that Dr. Wilbanks would have informed the Board
21 about a teacher giving a Nazi homework
22 assignment that made national news?

23 A I would, I would think so.

24 Q Do you know why he did not?

25 A I don't know that he did not, but I

1 don't recall getting the information.

2 Q Have you ever become aware of any
3 persons being banned from making comments or
4 statements during the public portion of the
5 School Board meetings for any reason?

6 A No.

7 Q Are you aware of any parents who
8 have been given trespass warnings and told they
9 cannot come on school campuses for any reason?

10 A I am.

11 Q And what circumstances generate
12 those notices?

13 A I believe primarily in the
14 elementary schools, and the parents wanted to
15 come into the school in areas that the school
16 had determined to be off limits for the safety
17 and the security of the children. And if the
18 parent violated that, then there would be a
19 clarification that they didn't have permission
20 to come onto the school campus.

21 Q And have parents been arrested for
22 trespass under that process?

23 A I'm not aware of them being
24 arrested.

25 Q If parents had been arrested under

1 that process, would you have expected
2 Mr. Wilbanks to bring that to the attention of
3 the School Board?

4 A I would think so.

5 Q That would be a serious incident in
6 your mind?

7 A It would be, would be.

8 Q Do you know what the racial
9 demographics of parents who have been arrested
10 for trespass after receiving a notice that
11 they're --

12 A I do not.

13 Q -- not allowed on campus?

14 A Excuse me. I do not.

15 Q Do you know how many parents have
16 been arrested for violating those notices?

17 A I do not.

18 Q Are you aware of any white parents
19 who have been arrested for violating a trespass
20 notice?

21 A I don't know.

22 MS. HOUK: I have no further
23 questions at this time, but pursuant to our
24 agreement that the deposition will remain open
25 in the event we're provided with additional

1 discovery, I'm ready to conclude today.

2 MR. COFFMAN: I do have one
3 question.

4 EXAMINATION

5 BY MR. COFFMAN:

6 Q Early on -- I'm going to take you
7 back to the beginning of this deposition.
8 Early on, you were asked about your opinion,
9 having taught in segregated schools in Georgia,
10 what your opinion was regarding segregation.

11 When you answered that question, I
12 thought you said that today, even today, you
13 didn't have an opinion on that, which I didn't
14 think could be correct. And I want to know if
15 you can clarify your position on that issue.

16 MS. HOUK: Objection. Leading.
17 Misstates testimony in evidence.

18 Q Okay. You can answer the question.

19 A I'm sorry?

20 Q You can answer the question.

21 A I can? Oh, I can answer?

22 MS. HOUK: As long as a lawyer
23 doesn't tell you not to answer --

24 THE WITNESS: Oh, all right.

25 MS. HOUK: -- you're free to go.

1 A All right. Before I do that, I had
2 promised you, to one of your questions, to give
3 you the names of the African-Americans who had
4 worked in my campaign. Ms. Wanda Anderson and
5 Joan and Skip Johnson.

6 Now, to the other matter at hand, I
7 don't know if you can tell I was quite nervous
8 when the questions began to be asked, began to
9 be asked. I interrupted you more than I meant
10 to, and my timing was not good. And I also
11 didn't listen carefully enough to your
12 questions.

13 I'm speaking specifically of my
14 having said I had no opinion about segregation.
15 And I want to apologize deeply for saying that
16 because I definitely do have an opinion and
17 have had an opinion for a very long period of
18 time.

19 I mentioned to you that I grew up in
20 Colorado, and while I was a student in college,
21 I watched George Wallace and Orval Faubus and
22 other governors of the states in the south
23 saying that no black student could ever come to
24 their schools, and of course, I was appalled by
25 that. I had no idea that within the next year

1 I would be living in the south and being one of
2 those teachers, teaching at a segregated
3 school.

4 And I was in segregated schools,
5 which were lawful at the time, but that doesn't
6 mean that I agreed with them or agreed with the
7 premise about which they were structured.

8 I won't go into great detail except
9 to say to you that, for all of my career, I
10 have worked to right unlawful balances in the
11 area of education, as I believe my resumé would
12 indicate to you.

13 For the last 18 years, I've been
14 privileged to work as a minority in a majority
15 institution. Two of them, actually. I've had
16 very great experiences interacting with
17 primarily African-Americans but many ethnic
18 groups, and that's in addition to my work on
19 the School Board.

20 And I found my school board
21 experience to be very complementary to my work
22 at Morehouse School of Medicine and Morris
23 Brown College because if students, all
24 students, do not gain a successful K through 12
25 education, they'll never be able to go to a

1 college like Morris Brown or a medical school
2 like Morehouse School of Medicine.

3 That's how I have to become so
4 familiar with black males and the Schott report
5 and those initiatives that greatly concern
6 education in our country as a whole, certainly
7 here in Gwinnett County.

8 And so I want to state for the
9 record, thank you for allowing me to do so,
10 that I indeed do have an opinion on segregated
11 schools. They've unlawful, and I certainly did
12 support the Voting Rights Act of 1965 that made
13 them unlawful -- I'm sorry, the Voting Rights
14 Act -- Brown versus Board of Education is what
15 I would so very much appreciate and support.
16 And I also support the Voting Rights Act of
17 '65.

18 So I think that's enough said, but I
19 did want to clarify.

20 RE-EXAMINATION

21 BY MS. HOUK:

22 Q And what prompted you to change your
23 testimony?

24 MR. COFFMAN: Objection.

25 Misstates --

1 THE VIDEOGRAPHER: We've got two
2 minutes left. Can I -- do you want to -- can I
3 change cards real quick?

4 MS. HOUK: Yes.

5 THE VIDEOGRAPHER: Thank you.

6 We're back on the video record at
7 5:59 p.m.

8 Q My question to you was: What
9 prompted your change of your testimony?

10 THE WITNESS: Were you going to say
11 something?

12 MR. COFFMAN: No. I'm good. You
13 can answer.

14 A You don't know me. And anyone who
15 might read these transcript or might have any
16 idea what my role is on the Gwinnett Board of
17 Education or Morehouse School of Medicine would
18 not know the full, full strength of my
19 commitment opposing segregated schools. Now
20 you know more about me.

21 Q That wasn't responsive to my
22 question. What prompted you to change your
23 testimony?

24 A Reflecting on what I said earlier
25 this morning when I was in a rush.

1 Q Did you speak to anyone about
2 changing your testimony before you just changed
3 your testimony a minute ago?

4 A I spoke to my husband.

5 Q And who else did you speak to about
6 your changing testimony before you testified
7 this afternoon?

8 A I told Ms. Sweeny and Mr. Coffman of
9 my desire to do this. It was of my own free
10 will and my own determination.

11 Q This was during a break at the
12 deposition?

13 A Yes.

14 Q And you understood this morning that
15 you were under oath; correct?

16 A Yes, I did, and that's why I want to
17 clarify the record.

18 Q And you're saying you changed your
19 testimony because you didn't understand the
20 question?

21 A I was too hasty in responding and
22 not reflecting enough on what my answer would
23 be and is.

24 Q Is there any other part of your
25 testimony you want to change?

1 A I -- it's a small thing, but I gave
2 you the correct address of Duluth, Georgia, and
3 actually, it's Peachtree Corners, Georgia. The
4 post office has changed the name of our address
5 to correspond with the formation of a new city,
6 Peachtree Corners.

7 Q And you're reading from something
8 written on a Post-it note?

9 A Right now.

10 Q And what is that?

11 A Wanda Anderson, Joan and Skip
12 Johnson, Duluth, Peachtree Corners, opinion
13 about segregation. And thank you for the
14 Post-its.

15 MS. HOUK: With the same limitation
16 that I expressed earlier, I'm ready to complete
17 the deposition now.

18 THE VIDEOGRAPHER: Going off the
19 video record at 6:02 p.m.

20 MR. COFFMAN: And read and sign.

21 (Proceedings adjourned, 6:02 p.m.)

22

23

24

25

1 I, MARY KAY MURPHY, Deponent,
2 do hereby certify that I have read the
3 foregoing deposition, and the same is a true
4 and accurate transcript of my testimony, except
5 for the changes listed below, if any.

6	PAGE/LINE/CHANGE	REASON
7	_____	_____
8	_____	_____
9	_____	_____
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19	_____	_____

20 If additional space is needed, please attach
21 separate sheet(s) and indicate number of
22 additional page(s) here: _____

23 _____
MARY KAY MURPHY, Deponent
This ____ day of _____, 20____.
24 Donovan Reporting, PC FAX: 770-428-5801
237 Roswell Street Marietta, GA 30060
25 Date of Deposition: 10-11-2017 CR: JM
Carole C. Boyce

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CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA
COUNTY OF COBB

I hereby certify that the foregoing deposition was reported as stated in the caption, and the questions and answers thereto were reduced to writing by me;

That the witness's right to read and sign the deposition was reserved;

That the foregoing pages 1 through 272 represent a true, correct, and complete transcript of the evidence given on the above-referenced date by the witness, MARY KAY MURPHY, who was first duly sworn by me;

That I am not of kin or counsel to any of the attorneys or parties in this case.

I do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I am a Georgia Certified Court Reporter; that I am an employee of Donovan Reporting PC; that Donovan Reporting PC was contacted by the attorney taking the deposition to provide court reporting services for this deposition; that I

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

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

19 This 24th day of October 2017.

20
21 
22 _____
23 JOEL P. MOYER, CCR 2745
24 Certified Court Reporter
25

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