EXHIBIT 2
In The Matter Of:

Fair Fight Action v. Raffensperger

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the report at all with Doctor Stewart?

A. No.

Q. So is it fair to say that your analysis of the Fulton County wait times, as you talk about in your report, was done in some ways in a vacuum without discussion of any of the authors of the BPC report?

A. Yes.

Q. You've also attached to your report your curriculum vitae. Is the one we received, looks like the draft date was April 2019, is it still generally accurate?

A. Yes.

Q. Your principal -- you identify your principal field of interest as operations management and applied operations research. What does that mean in layman's terms?

A. Well, I'm primarily interested in the study of operations in terms of design, planning, improvement of operations, and that can be in the context of manufacturing systems, service systems, distribution systems, logistics systems.

Q. Okay. You don't have any -- you're not opining, though, on anything involving why
MR. DuBOSE: Objection.

A. I'll try, and let me take an example.

Q. Sure.

A. So I have a coin. I want to know whether
or not the coin is fair or not, and that's
all I care about. Okay? So then
statistically, I might flip it 100 times,
and, you know, if I want to have some level
of confidence whether it's fair or not,
I'll set up, let's say, sort of rejection
limits. I think I simulated this before
but if I want to have sort of five percent
confidence level, then I would reject the
null hypothesis that it's fair if after I
flip it 100 times, I have 60 heads or I
have 60 tails so --

Q. Something's wrong?

A. Yeah, something's wrong. It's either
coming up heads too often or tails too
often, and that's sort of what we mean by a
two-sided test, and it would be appropriate
if, again, I have this coin and all I care
about is is it a fair coin or not.

So an alternative setting is, think
about I'm in a casino setting and I want to
know whether this coin favors the house or not, and by favoring the house it comes up heads too often, so then if I was doing statistical tests there, and if I wanted this five percent confidence level, if I flipped it 100 times, then I would reject the null hypothesis that it's fair if I came up with 58 heads.

Q. Because 58 exceeds 50 or 55?

A. Right, but 55 could happen by chance but if it were 58 heads, then I would think the house was up to something and it was fishy, and that's what we mean by a one-sided test. In some sense the -- well, the question was posed differently. The first question was is this coin fair or not, and someone says I don't have any other information. I don't have a leaning or a horse in the game, type thing, whereas this other setting is what I want to know is is this coin favoring the house or not, and if that's the question, then I use this one-sided test.

Q. Okay.

A. And then back to this. It seems to me that
what we care about here is, you know, do
African American voters wait longer or not.
At polling locations with predominantly
African American voters, are they waiting
longer than other polling locations, and if
that's really what we care about, then in
terms of statistical tests, we should use
this one-sided test, and so that's the
nature of my objection, whereas in the
Trende expert report, everything he did was
accurate but he was relying on a two-sided
test.

Q. I see. Okay. So the two-sided test, going
back to your coin analysis, is you just
flip it up 100 times and you make a
determination if it's -- you're not looking
to see if it favors one side or the other,
just is it fair?

A. Right, and say that could be biased one way
or other way and both those ways mean it's
unfair.

Q. So your analysis then is that, forgive me,
your analysis is the two-sided test, which
is are African Americans waiting longer at
polling locations than whites in Fulton
County, is that accurate?

A. No, my analysis is what I would call a one-sided test.

Q. Okay. Thank you. Your analysis looks to, rather than me explain it, you tell me how your analysis is the one-sided test.

A. In statistics we have two hypothesis and we're trying to usually reject, see about rejecting the null hypothesis, and here the null hypothesis would be that there's not a positive relationship between wait time and the percent of African American voters at a polling location, and we're going to test that vis a vis an alternative hypothesis where the alternative hypothesis is there is a positive relationship between wait time and the percent of African American voters, so that's what I'm testing.

Q. Alright. Okay.

A. Whereas, I would say, do you want me to go on?

Q. Yes, whereas Trende --

A. Trende's null hypothesis is that there's no relationship between wait time and the percent of African American voters, that's
his null hypothesis, and then his
alternative hypothesis against which he's
testing is that there is a relationship and
it could be either positive or negative.

Q. And as I think I heard you say and I read
in the report, in terms of the math, you
don't have any criticism of Trende's
report, it's just how he's analyzing the
topic, is that a fair way to put it?

A. Yes. I'm not sure I would say how he's
analyzing but how he set up the analysis,
how he's framed the question.

Q. Okay. You then, and this may go into that
same line of questions we just had, but on
Page 3 of your report, the substance is
Page 4 of the document, in the third full
paragraph starting with "thus." Midway
through it says "This is a less stringent
test but is more relevant for the given
question at hand."

A. Yes.

Q. That means your test is a less stringent
test?

A. Yes.

Q. What makes it less stringent than Trende's?