

IN THE SUPREME COURT OF OHIO

League of Women Voters of Ohio, et al.,

Relators,

v.

Governor Michael DeWine, et al.

Respondents.

Case No. 2021-1449

Original Action Filed Pursuant to
Ohio Const., art. XIX

Apportionment Case

AFFIDAVIT OF CONGRESSWOMAN MARCY KAPTUR

STATE OF OHIO)
) SS:
COUNTY OF LUCAS)

Now comes affiant Marcy Kaptur, having been first duly cautioned and sworn, deposes and states as follows:

1. I am over the age of 18 and fully competent to offer the testimony contained herein. I make these statements based on my personal knowledge.
2. I am a member of the United States House of Representatives, representing Ohio's 9th congressional district. I was first elected to Congress in November of 1982, and was sworn in on January 3, 1982. I have represented the 9th congressional district continuously since then.
3. I am a member of the Democratic Party.
4. As it is drawn under the current congressional map, which was enacted in 2011 (the "2011 Map"), Ohio's 9th congressional district is a long, slender district that stretches from Toledo to Cleveland. It includes portions of Cuyahoga, Erie, Lorain, Lucas, and Ottawa counties. It's been infamously described as the "Snake on the Lake."

5. Under the 2011 Map, the neighboring 5th congressional district lies primarily to the west and southwest of the 9th congressional district. The 5th district is roughly square-shaped, and encompasses the northwestern corner of Ohio.
6. I had no input into the 2011 Map. When I first saw it, I was immediately concerned about how the 9th congressional district was drawn. Among other things, it divides up communities and counties, so that the district encompasses only small portions of several counties, from Cuyahoga County to Lucas County. The district is very long and slender, and not compact.
7. I found it astonishing and very troubling that the district was drawn in that manner. It is important to draw compact congressional districts that preserve communities. It is much harder to build communities when their congressional representation is divided.
8. I also had no input into the Ohio congressional district map that Governor DeWine signed into law on November 20, 2021 (the “2021 Map”), but I reviewed it after it became publicly available.
9. Unfortunately, many of the aspects of the 2011 Map that concerned me are not remedied in the 2021 Map, but are actually exacerbated.
10. For example, the 5th congressional district under the 2021 Map would be even longer and more spread out than the “Snake on the Lake,” the 9th district under the 2011 Map. It is not compact. It includes Lorain County, which is just west of Cleveland in the northeast quadrant of Ohio, and stretches all the way to the western border of the state, where it curves south and covers Paulding, Van Wert, and Mercer Counties, all of which are along the Indiana border.

11. The 2021 Map also separates the cities of Toledo and Lorain, placing the former in the 9th district, and the latter in the 5th district.
12. I am well familiar with Lorain and the community around it, as it currently lies within the district that I represent. I have approximately ten years of experience representing that community. It shares more in common with the Toledo community than with more rural areas like Paulding, Van Wert, and Mercer Counties. For example, Lorain and Toledo both lie along the lakefront, which in my experience means that they share common political interests, especially relating to environmental concerns. They also share similar demographic characteristics, including significant minority populations.
13. The people of Lorain and Toledo would not be well served by being combined into an even longer, more spread-out district than they are currently in, or being combined together with distant rural areas near Indiana. Unfortunately, that is exactly what the 2021 Map does.
14. While removing Lorain from the 9th district, the 2021 Map also removes Williams, Fulton, Defiance, and Henry Counties from the 5th district and places them in the 9th district. This exchange serves only to make the 5th district less compact, and to dilute the voting power of both the Lorain and Toledo communities.

FURTHER AFFIANT SAYETH NAUGHT.

Executed on December 6, 2021.


Congresswoman Marcy Kaptur

Sworn and subscribed before me this 6th day of December, 2021.


Notary Public

My commission expires



MARGARET J. RYAN
NOTARY PUBLIC - OHIO
MY COMMISSION EXPIRES 11-14-2022

CERTIFICATE OF SERVICE

I, Freda J. Levenson, hereby certify that on this 10th day of December, 2021, I caused a true and correct copy of the foregoing document to be served by email upon the counsel listed below:

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