

**IN THE SUPREME COURT OF OHIO**

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**Regina C. Adams, *et al.*,**

***Relators,***

**v.**

**Governor Mike De Wine, *et al.*,**

***Respondents.***

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**Case No. 2021-1428**

**Original Action Filed Pursuant to  
Ohio Const., Art. XIX, Sec. 3(A)**

**League of Women Voters of Ohio, *et al.*,**

***Relators,***

**v.**

**Governor Mike De Wine, *et al.*,**

***Respondents.***

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**Case No. 2021-1449**

**Original Action Filed Pursuant to  
Ohio Const., Art. XIX, Sec. 3(A)**

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EXHIBITS APPENDIX A - DEPOSITIONS  
Volume 1 of 2**

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**EXHIBITS APPENDIX A - DEPOSITIONS**  
**Volume 1 of 2**

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# Transcript of Raymond DiRossi

**Date:** December 7, 2021

**Case:** League of Women Voters of Ohio, et al. -v- Ohio Redistricting Comm., et al.

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IN THE SUPREME COURT OF OHIO

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LEAGUE OF WOMEN :  
VOTERS OF OHIO, :  
et al., : Case Nos. 2021-1193  
Relators, : 2021-1198  
v. : 2021-1210  
OHIO REDISTRICTING :  
COMMISSION, et al., :  
Respondents. :  
- - - - - x

REMOTE VIDEOTAPED DEPOSITION of RAYMOND DiROSSI  
Tuesday, December 7, 2021  
8:04 a.m. CST

Job No.: 416827  
Pages: 1 - 231  
Reported By: Michelle M. Yohler, CSR, RMR, CRR

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

1 Videotaped deposition of RAYMOND DiROSSI, held  
2 remotely pursuant to notice before Michelle M.  
3 Yohler, CSR, RMR, CRR, a certified shorthand  
4 reporter, CSR No. 84-4531.

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1 A P P E A R A N C E S

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12  
13 ALSO PRESENT:

14 Mr. Frank Strigari, Senate Counsel

15 Mr. Ethan Rex, Technician

16 Ms. Madeline Nagy, Videographer

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Transcript of Raymond DiRossi  
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1	P R O C E E D I N G S	08:02:51
2	(Technician read-on.)	08:02:51
3	THE VIDEOGRAPHER: Here begins disk number	08:03:38
4	one in the videotaped deposition of Raymond	08:03:40
5	DiRossi, in the matter of League of Women Voters	08:03:43
6	of Ohio versus Governor Mike DeWine, et al., in	08:03:46
7	the Supreme Court of Ohio, Case No. 2021-1449.	08:03:52
8	Today's date is Tuesday, December 7th,	08:03:58
9	2021, and the time on the video monitor is	08:04:03
10	8:04 a.m.	08:04:05
11	The videographer today is Madeline Nagy,	08:04:06
12	representing Planet Depos.	08:04:11
13	This video deposition is taking place	08:04:12
14	remotely.	08:04:14
15	Would counsel please voice-identify	08:04:15
16	themselves and state whom they represent.	08:04:18
17	MR. KLEIN: Spencer Klein, Elias Law	08:04:24
18	Group, representing Adams Relators.	08:04:27
19	MS. BENDER: Good morning. This is Brady	08:04:30
20	Bender, from Covington & Burling, representing the	08:04:32
21	League of Women Voters Relators.	08:04:34
22	MR. McGUIRE: Greg McGuire with the Nelson	08:04:37
23	Mullins Law Firm, representing the President and	08:04:39
24	Speaker.	08:04:42
25	MS. COONTZ: This is Bridget Coontz from	08:04:47

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	the Ohio Attorney General's Office, representing	08:04:48
2	Secretary of State Frank LaRose. With me is	08:04:50
3	Michael Walton from the Attorney General's Office	08:04:53
4	as well.	08:04:57
5	THE VIDEOGRAPHER: The court reporter	08:05:04
6	today is Michelle Yohler, representing Planet	08:05:05
7	Depos.	08:05:07
8	Would the reporter please swear in the	08:05:07
9	witness.	08:05:07
10	(WHEREUPON, the witness was duly sworn.)	08:05:07
11	MR. McGUIRE: All right. By agreement of	08:05:32
12	discussion between counsel right before we began	08:05:34
13	the deposition, Mr. DiRossi has in front of him	08:05:36
14	for today's deposition three of the maps that were	08:05:41
15	introduced during the redistricting proceedings at	08:05:47
16	issue here, and he would like to have those for	08:05:51
17	purposes of illustration.	08:05:53
18	They are not currently marked as	08:05:55
19	deposition exhibits; however, we have expressed to	08:05:57
20	relators' counsel that we -- I don't believe	08:06:01
21	anybody has any problem with making them exhibits,	08:06:05
22	if that's appropriate and needed.	08:06:07
23	The three maps are -- the three drawn maps	08:06:09
24	are Senate Bill 258, the map that was adopted, in	08:06:12
25	fact; Senate Bill 237, also sometimes called the	08:06:17

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	Yuko-Sykes map; and House -- and HB Senate -- I'm	08:06:22
2	sorry -- HB Map 483, so House Bill Map 483. Those	08:06:26
3	are the three maps that he has in front of him.	08:06:35
4	And, Counsel, is it correct that we -- and	08:06:39
5	nobody has any objection to that?	08:06:41
6	MR. KLEIN: That is correct.	08:06:42
7	MS. BENDER: That is correct.	08:06:43
8	MR. McGUIRE: All right. Thank you.	
9	RAYMOND DiROSSI,	
10	called as a witness herein, having been first duly	
11	sworn, was examined and testified as follows:	
12		
13	EXAMINATION	08:06:56
14	BY MR. KLEIN:	08:06:56
15	Q All right. Good morning.	08:06:56
16	My name is Spencer Klein with the Elias	08:06:56
17	Law Group, and I am representing Adams Relators in	08:06:57
18	this case, and I'm going to be asking you -- I'm	08:06:58
19	going to be asking you questions today.	08:07:05
20	So can we first get your name for the	08:07:06
21	record.	08:07:09
22	A Sure. It's Raymond Edward DiRossi.	08:07:09
23	Q Okay, Mr. DiRossi.	08:07:12
24	First I want to go over a few ground	08:07:12
25	rules. You may recall this from the last	08:07:19

1 deposition we did from -- so, first, when you 08:07:21  
2 answer my questions today, please do so verbally 08:07:23  
3 instead of with a hand gesture and a nod because 08:07:27  
4 of course that cannot be recorded by the court 08:07:30  
5 reporter. 08:07:32

6 I'm going to be asking you questions 08:07:33  
7 today. And when I start a question, you may know 08:07:36  
8 the answer immediately, but I'm -- but I'd ask you 08:07:38  
9 to give me a chance to finish my question because 08:07:44  
10 if there's a lot of cross-talk, the court reporter 08:07:46  
11 is not going to be able to record that. 08:07:49

12 If you do not understand a question I'm 08:07:52  
13 asking, just go ahead and let me know, and I can 08:07:56  
14 simply rephrase. 08:07:59

15 So first question, are you represented by 08:08:03  
16 counsel today? 08:08:06

17 A Yes. 08:08:09

18 Q Okay. And are they here in the room with 08:08:10  
19 you right now? 08:08:12

20 A Yes. 08:08:13

21 Q Okay. And they've already entered their 08:08:15  
22 names onto the record. 08:08:17

23 When I ask you questions, Counsel may 08:08:18  
24 object. Unless you're instructed not to answer 08:08:21  
25 the question, please answer the question, despite 08:08:25

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1 the objections. Unless, of course, you do not 08:08:27  
2 understand the question, and then I can, of 08:08:29  
3 course, rephrase. But still, nonetheless, if you 08:08:32  
4 are -- if you -- if you are instructed not to 08:08:35  
5 answer, don't answer, but, otherwise, please give 08:08:40  
6 an answer. 08:08:42

7 If you'd like to take a break at some 08:08:42  
8 point during the deposition, we can do so, but I 08:08:45  
9 would ask you to answer any open questions before 08:08:49  
10 we take a break. 08:08:51

11 So is there any reason you cannot provide 08:08:53  
12 truthful testimony today? 08:08:57

13 A No. 08:08:58

14 Q And what did you do to prepare for today's 08:08:58  
15 deposition? 08:09:03

16 A I printed these three maps so I had them 08:09:04  
17 as reference material, and I spoke to Counsel 08:09:10  
18 before the -- before today. 08:09:12

19 Q And did you consult any other materials to 08:09:15  
20 prepare for this deposition today, besides what 08:09:17  
21 you just mentioned? 08:09:20

22 A Well, obviously, looking at the enacted 08:09:29  
23 maps and the proposed maps that were proposed, 08:09:33  
24 there's -- there's other information besides the 08:09:36  
25 visual information. So I guess that would've -- I 08:09:39

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	would've seen that as well.	08:09:42
2	Q Okay. Got you.	08:09:43
3	A And refreshing my memory about the	08:09:45
4	process and the timeline.	08:09:47
5	Q Okay. So, as you know, we are conducting	08:09:50
6	the deposition today remotely, and I want to run	08:09:53
7	through a few questions and ground rules related	08:09:56
8	to that.	08:09:58
9	So, first, where are you sitting today?	08:09:59
10	A I'm in a Columbus law firm in a conference	08:10:03
11	room.	08:10:07
12	Q Okay. And --	08:10:08
13	A Columbus, Ohio.	08:10:09
14	Q And I see that you have your counsel	08:10:11
15	sitting in the room with you. Is there anyone	08:10:17
16	else in the room aside from the two counsel that	08:10:20
17	are sitting in the room from you right now -- with	08:10:22
18	you right now?	08:10:25
19	A Myself, other than...	08:10:25
20	Q Right. Of course.	08:10:27
21	And what devices do you have in front of	08:10:30
22	you?	08:10:32
23	A Devices? You mean -- what -- I have my	08:10:32
24	laptop.	08:10:40
25	Q Okay. Excellent.	08:10:41

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	A Nothing else electronic.	08:10:42
2	MR. KLEIN: And on that note, is there a	08:10:44
3	way we could switch to the feed that actually has	08:10:45
4	Mr. DiRossi on it with the actual screen in front	08:10:49
5	of him? Right now I have Mr. DiRossi plus	08:10:52
6	counsel.	08:10:56
7	Unless folks would prefer to do it the	08:10:57
8	other way.	08:10:57
9	MR. McGUIRE: Well, I guess I have two	08:11:01
10	responses to that, and I assume Mr. Strigari may	08:11:02
11	want to say something, having been involved in the	08:11:02
12	last round of depositions taken from this	08:11:04
13	location.	08:11:05
14	Number one was, it was my understanding	08:11:06
15	that this was the way it was set up, that that was	08:11:07
16	somehow the preferred method that people wanted to	08:11:10
17	use, but maybe I wasn't in on -- you know, I	08:11:13
18	wasn't in on that planning.	08:11:16
19	But, number two, if we were going to make	08:11:17
20	a change -- and I'll let Mr. Strigari speak --	08:11:20
21	we'd need to go find the very nice gentleman from	08:11:25
22	this law firm who was in here earlier. We can't	08:11:26
23	control this thing.	08:11:26
24	MR. KLEIN: That's all fine then. Do not	
25	worry about it at all. This is perfectly fine.	

Transcript of Raymond DiRossi  
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1 THE TECHNICIAN: Counsel, if I may? You  
2 can pin -- if you go to the participant --  
3 MR. KLEIN: Oh, right.  
4 THE TECHNICIAN: -- window and pin. That  
5 should help you there, Counsel. 08:11:43  
6 MR. McGUIRE: To the extent it helps, 08:11:43  
7 Mr. Klein, I'm sure Mr. DiRossi will be more than 08:11:43  
8 happy to tell you that he is not referencing at 08:11:46  
9 any point you want to ask him notes or tips or 08:11:49  
10 helpful hints on his testimony. That's not what's 08:11:51  
11 on the screen in front of him. 08:11:54  
12 MR. KLEIN: Okay. 08:11:54  
13 THE WITNESS: I don't know how to show you 08:11:57  
14 my screen. 08:11:58  
15 MR. KLEIN: All right. Perfect. You got  
16 my next question there. I appreciate that.  
17 (Reporter interruption.)  
18 THE VIDEOGRAPHER: The time is 8:12. We  
19 are off the record.  
20 (Technological issues were resolved off  
21 the record.) 08:17:31  
22 THE VIDEOGRAPHER: The time is 8:17. We 08:17:31  
23 are on the record. 08:17:35  
24 BY MR. KLEIN: 08:17:40  
25 Q Okay. Just a few more ground rules 08:17:40

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	related to the remote deposition. So if anyone	08:17:42
2	comes into the room besides the folks who are	08:17:46
3	there right now, I would just ask you to note that	08:17:48
4	for the record. Is that okay?	08:17:51
5	A Absolutely.	08:17:52
6	MR. McGUIRE: Yes.	08:17:52
7	BY MR. KLEIN:	08:17:53
8	Q And in the event anyone attempts to	08:17:53
9	communicate with you during the deposition, I'd	08:17:58
10	also ask for you to note that for the record as	08:18:00
11	well, all right?	08:18:05
12	A Yes.	08:18:05
13	Q Okay. And, finally, can I just get your	08:18:05
14	agreement that you won't consult with anyone about	08:18:08
15	your testimony today until the deposition is over,	08:18:10
16	even -- even during breaks?	08:18:14
17	A Yes.	08:18:18
18	Q Okay. All right. So getting into the	08:18:21
19	questions.	08:18:28
20	I'm going to start with a few questions	08:18:28
21	about your background in redistricting and your	08:18:31
22	work in the General Assembly. Now, as you know,	08:18:33
23	we covered a lot of this in your deposition for	08:18:38
24	the General Assembly case, so I think we can keep	08:18:39
25	this relatively brief.	08:18:42

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1           But, first, just for the record, where are           08:18:43  
2 you currently employed, Mr. DiRossi?           08:18:45  
3           A I work for the Ohio Senate.           08:18:47  
4           Q Okay. And what is your title?           08:18:49  
5           A I am the director of finance and budget.           08:18:51  
6           Q Okay. And in that role, who do you report           08:18:54  
7 to?           08:18:58  
8           A I report to the Chief of Staff of the Ohio           08:18:58  
9 Senate and the president of the Senate.           08:19:04  
10          Q Okay. So how long have you worked in           08:19:06  
11 state government for?           08:19:16  
12          A Well, I had a break in service, but I           08:19:16  
13 first started to work in the Ohio Senate in 1991.           08:19:19  
14          Q Okay. So about 30 years?           08:19:23  
15          A Not -- if you count the break in service.           08:19:25  
16          Q Right. If you count the break in service.           08:19:31  
17 Okay.           08:19:33  
18           And how long have you helped draw           08:19:33  
19 redistricting maps in Ohio for?           08:19:35  
20          A This is the third cycle I've been           08:19:38  
21 involved --           08:19:47  
22          Q Third cycle?           08:19:48  
23          A -- in the process.           08:19:48  
24          Q Okay. Thanks.           08:19:50  
25           And for each of these three cycles, you've           08:19:50

1 helped out with both congressional and General 08:19:53  
2 Assembly maps; is that correct? 08:19:57  
3 A Correct. 08:19:58  
4 Q Okay. And in any of these three cycles, 08:19:58  
5 did you ever play -- did you ever play a 08:20:01  
6 leadership role? 08:20:04  
7 A It depends on your definition of 08:20:05  
8 "leadership role." 08:20:11  
9 Q Sure. Yeah, so did you have anybody 08:20:12  
10 reporting to you during redistricting work? 08:20:14  
11 A I'm thinking through the three cycles. 08:20:16  
12 Q Sure. 08:20:24  
13 A I don't think I ever had anybody reporting 08:20:24  
14 to me, no. 08:20:30  
15 Q Okay. And so through these three cycles, 08:20:31  
16 would it be fair to say that your work has made 08:20:34  
17 you one of the most experienced redistricting map 08:20:37  
18 drawers in the state? 08:20:40  
19 A That's certainly not for me to say. 08:20:42  
20 Q Okay. Well, are you familiar with anyone 08:20:47  
21 who has more experience drawing Ohio redistricting 08:20:50  
22 maps than you? 08:20:54  
23 A I mean, both the legislative and 08:20:54  
24 congressional processes this time, as I assume 08:21:07  
25 everyone is well aware, are new processes that 08:21:11

1 were approved by the voters, and these are the 08:21:15  
2 first times they've ever been used. So, I mean, I 08:21:17  
3 had no experience in this process -- 08:21:20  
4 Q Sure. 08:21:22  
5 A -- because these were brand-new processes. 08:21:22  
6 So I don't know -- that's the best answer I can 08:21:25  
7 give to your question. 08:21:28  
8 Q No, for sure. Of course. 08:21:29  
9 I guess I'm speaking, you know, not about 08:21:31  
10 the specific new laws necessarily but 08:21:33  
11 redistricting generally in Ohio, working with the 08:21:37  
12 state's geography to draw congressional and 08:21:42  
13 General Assembly maps. Is there anyone you know 08:21:45  
14 who's more experienced than you at that? 08:21:48  
15 A I don't know anybody else who was involved 08:21:50  
16 in those three cycles, but I can't say there 08:21:55  
17 aren't people that have been involved in other 08:21:58  
18 cycles. 08:22:01  
19 Q Okay. And is it true, Mr. DiRossi, that 08:22:01  
20 you received the Ohio State University's 08:22:05  
21 Distinguished Service Award one year? 08:22:07  
22 A I did. Very recently. Yes. 08:22:10  
23 Q Yeah. When was that? What year? 08:22:13  
24 A Oh, boy. It wasn't too long ago. It was 08:22:15  
25 a couple years ago. 08:22:20

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

19

1	Q	Yeah, I think it might have been 2018?	08:22:20
2	A	That sounds right.	08:22:23
3	Q	All right.	08:22:23
4	A	That sounds right.	08:22:25
5	Q	And it looks like that was in recognition	08:22:26
6		for your work on redistricting in Ohio; is that	08:22:29
7		right?	08:22:32
8	A	That's -- I don't know. I thought it was	08:22:32
9		more of all of the decades I had spent working on	08:22:36
10		budget and tax policy in the legislature.	08:22:39
11	Q	Fair enough. And through your work on	08:22:42
12		redistricting, do you think you've gained a	08:22:49
13		significant degree of -- sorry. You can strike	08:22:52
14		that.	08:22:52
15		Through your work, do you think you've	08:22:59
16		gained a significant degree of familiarity with	08:23:01
17		Ohio's geography?	08:23:04
18	A	Well, Ohio's geography is ever-changing,	08:23:07
19		especially with our annexation laws, and the	08:23:14
20		boundaries of our subdivisions are continually	08:23:16
21		changing as our cities are annexed from our	08:23:19
22		townships.	08:23:24
23		So I hope that's an answer to your	08:23:24
24		question.	08:23:27
25	Q	Right. Certainly. So -- but at a given	08:23:27

1 time, do you think you have a significant degree 08:23:30  
2 of familiarity with what Ohio's county, city, and 08:23:32  
3 township borders are? 08:23:36

4 A Well, I definitely have a general 08:23:38  
5 knowledge of that, but I'm sure the elected 08:23:40  
6 officials who represent the 132 districts in the 08:23:42  
7 General Assembly have probably an even greater 08:23:45  
8 appreciation for their -- the geography of the 08:23:48  
9 state in their districts. 08:23:51

10 Q Certainly. 08:23:53

11 A As well as the other statewide elected 08:23:53  
12 officials that are in Ohio. 08:23:56

13 Q Certainly. Yeah. 08:23:57

14 But just speaking about you and not in 08:24:02  
15 comparison to anybody else, would you say that you 08:24:04  
16 have a significant -- would you say that you have 08:24:07  
17 a significant amount of knowledge regarding the 08:24:09  
18 kinds of communities within Ohio's cities and 08:24:11  
19 townships and counties? 08:24:16

20 MR. McGUIRE: Object to the form. 08:24:20

21 MR. KLEIN: Fair. That's fair. 08:24:20

22 MR. McGUIRE: You can answer. 08:24:22

23 BY MR. KLEIN: 08:24:23

24 Q You know, would you say that you have a 08:24:23  
25 significant amount of familiarity with, say, what 08:24:25

1 sort of industry would be prevalent in a given 08:24:27  
2 city in Ohio? 08:24:30

3 A I wouldn't answer that in a general way. 08:24:35  
4 I mean, obviously -- I was -- I was born in Summit 08:24:38  
5 County, so I know Summit County a little better. 08:24:43  
6 And I've worked in the General Assembly for 08:24:46  
7 certain legislators from certain areas, and I 08:24:48  
8 might have a better understanding of those areas, 08:24:50  
9 but the state as a whole, I would not generally 08:24:52  
10 say that. 08:24:55

11 Q Okay. Okay. So getting into this 08:24:55  
12 redistricting cycle, did you help prepare -- did 08:25:08  
13 you help prepare a congressional redistricting map 08:25:13  
14 for Ohio this year? 08:25:17

15 A Yes. 08:25:18

16 Q Okay. And were you asked to work on a map 08:25:21  
17 by someone? 08:25:29

18 A Yes. 08:25:29

19 Q And who was that? 08:25:34

20 A President Huffman directed me to work with 08:25:35  
21 Senator McColley on the map that he introduced. 08:25:39

22 Q Okay. And do you remember when you got 08:25:43  
23 this direction? 08:25:46

24 A It would have been mid to -- mid to late 08:25:54  
25 October. 08:25:57

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

22

1	Q Okay. Mid to late October. All right.	08:25:58
2	And -- so you got the direction in mid to	08:26:05
3	late October. Had you done any work regarding	08:26:07
4	congressional redistricting for the cycle before	08:26:09
5	that time?	08:26:11
6	A The -- maybe a little but not a lot. The	08:26:12
7	time after -- or the time preceding that was	08:26:20
8	mostly taken up by things that we were doing post	08:26:23
9	legislative redistricting, and that was a major	08:26:28
10	focus of -- and a consumption of time in October	08:26:32
11	leading up to when I was working with Senator	08:26:35
12	McColley, among other things.	08:26:40
13	Q Right. Right. So after you got this	08:26:41
14	instruction, when would you say you got to work on	08:26:47
15	this project to make congressional redistricting	08:26:50
16	maps?	08:26:53
17	A Probably mid-October.	08:26:54
18	Q Mid-October. Okay.	08:26:55
19	Do you have any ballpark on, you know,	08:26:57
20	when that might be or anything?	08:27:01
21	A No. Like I said, there were a number of	08:27:05
22	things that were consuming a lot of time in early	08:27:09
23	October and late -- mid to late September,	08:27:13
24	including spending some time with you in previous	08:27:16
25	depositions and other activities. And so we	08:27:19

1 really -- I didn't get a chance to start on that 08:27:21  
2 until mid-October. 08:27:24  
3 Q Absolutely. Absolutely. 08:27:24  
4 Okay. And -- and just for the record -- I 08:27:30  
5 know we covered this last time when we had a 08:27:32  
6 chance to speak to one another -- your work began 08:27:34  
7 for the state legislative maps -- actually -- 08:27:39  
8 sorry. I think we can strike that. 08:27:42  
9 For the state legislative maps, your work 08:27:44  
10 began after the release of the census data; is 08:27:46  
11 that correct? 08:27:50  
12 A You know, I know we spoke about this in 08:27:50  
13 the previous deposition, so I guess I would just 08:27:57  
14 defer to whatever -- whatever I said. 08:27:59  
15 I remember saying that I was focused on 08:28:01  
16 the state operating budget that was being put in 08:28:03  
17 place for the State of Ohio for two years. That 08:28:05  
18 had to be put in place and signed by the Governor 08:28:08  
19 by June 30th. And so everything leading up to 08:28:11  
20 June 30th -- and obviously we didn't have census 08:28:14  
21 data then like we were supposed to -- was focused 08:28:17  
22 on budget stuff. 08:28:21  
23 So whatever timeline that I answered your 08:28:22  
24 questions in the previous deposition is what I 08:28:24  
25 would defer to. 08:28:26

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

24

1 Q Got it. Got it. So I just want to 08:28:27  
2 confirm this, though, from the time of the census 08:28:32  
3 data release -- which I can represent to you was 08:28:35  
4 in August -- up to mid-October, there was no work 08:28:37  
5 being done on the congressional maps by you; is 08:28:42  
6 that correct? 08:28:46

7 A Yeah, you're asking me to define what 08:28:46  
8 the -- what "work" means. I mean, did the thought 08:28:51  
9 cross my mind of that's next? I'm sure. But the 08:28:57  
10 work, as I would define it, started in 08:28:59  
11 mid-October. 08:29:03

12 Q Sure. And I can -- I can break that down 08:29:04  
13 a little bit. 08:29:08

14 So before mid-October, had you consulted 08:29:09  
15 any data that you planned to use for congressional 08:29:16  
16 redistricting? 08:29:22

17 A I don't recall doing that. I remember 08:29:23  
18 mid-October being the time when it kind of turned 08:29:26  
19 my attention to that. Depositions were done, 08:29:28  
20 affidavits were filed, all of the documentation 08:29:31  
21 that needed to be provided to the Secretary of 08:29:34  
22 State on the legislative process was done, and we 08:29:36  
23 could turn our attention to the next -- the next 08:29:39  
24 task. 08:29:42

25 Q All right. Did you create any sort of 08:29:42

1	digital files related to congressional	08:29:47
2	redistricting prior to mid-October?	08:29:51
3	A None that I recall. None that I recall	08:29:57
4	sitting here today.	08:29:59
5	Q Did you have any conversations related to	08:30:05
6	congressional redistricting -- actually -- strike	08:30:08
7	that.	08:30:08
8	Did you have any conversations related to	08:30:17
9	your creation of a congressional redistricting map	08:30:18
10	for this cycle prior to mid-October?	08:30:21
11	A Can you say that question again, please?	08:30:24
12	Q Sure thing.	08:30:30
13	So did you have any conversations related	08:30:31
14	to your creation of a congressional redistricting	08:30:38
15	map for this cycle prior to mid-October?	08:30:42
16	A Yeah, any conversations -- I mean, I'm	08:30:45
17	sure there were conversations about timelines and	08:30:49
18	when we would, you know, focus on that and when	08:30:52
19	the legislative stuff would be done.	08:30:54
20	As far as related to -- you're asking the	08:30:58
21	creation of it? None that I recall sitting here	08:31:02
22	today. None that -- none that I can remember.	08:31:05
23	Q Right. So just to -- just so we're clear.	08:31:07
24	So you didn't have any conversations that you can	08:31:12
25	recall related to the creation of any	08:31:14

1 congressional maps prior to mid-October, correct? 08:31:20

2 A Again, help me understand what "related to 08:31:23

3 the creation of" -- I mean, there were 08:31:25

4 conversations. I remember people would ask, well, 08:31:28

5 when is congressional? And I'd say, we're still 08:31:31

6 working on legislative, we're still doing this, 08:31:33

7 this, this, and this. 08:31:37

8 But if that's responsive to your question, 08:31:38

9 then I guess that's the answer. But if you're 08:31:40

10 asking another kind of conversation, help me 08:31:42

11 understand what that is so I can -- 08:31:44

12 Q Right. I guess -- we can talk about this 08:31:46

13 a little bit differently. 08:31:48

14 Was the first conversation you had about 08:31:50

15 you having an assignment to create congressional 08:31:55

16 maps the conversation you had with Senate 08:32:00

17 President Huffman in mid-October? 08:32:04

18 A Well, I guess I would say when we started 08:32:06

19 the legislative process, I understood that I would 08:32:11

20 also be working on the congressional process. So 08:32:16

21 that obviously would have happened before October. 08:32:18

22 But once the legislative stuff was done, 08:32:20

23 mid-October is when I really -- that's when I 08:32:23

24 started working, if you -- however you define that 08:32:25

25 term -- on the next task, the congressional 08:32:29

1	districts.	08:32:34
2	Q Got it. Okay. So when you started your	08:32:34
3	work, was it your goal to have a draft	08:32:37
4	congressional map finished at a certain point in	08:32:41
5	time?	08:32:44
6	A I don't know if I ever was working, in my	08:32:50
7	mind, under that specific of a timeline; I was	08:32:53
8	just starting to work. And very soon thereafter,	08:32:55
9	Senator Huffman, President Huffman, said work with	08:33:00
10	Senator McColley on his bill that became the	08:33:03
11	introduced version of Senate Bill 258.	08:33:06
12	That happened soon thereafter, somewhere	08:33:09
13	near the last week of October. And then that	08:33:12
14	became -- that became the focus.	08:33:13
15	Q Right. But had you set -- strike that.	08:33:15
16	Had you set a deadline for finishing a	08:33:22
17	draft of a congressional map?	08:33:25
18	A In my mind, I was just starting the	08:33:29
19	process. I didn't think about deadlines and	08:33:34
20	timelines. That is something that the president	08:33:37
21	of the Senate -- specifically for me as a State of	08:33:38
22	Ohio Senate employee, I would look to him for	08:33:43
23	direction from. I --	08:33:45
24	Q Okay.	08:33:47
25	A -- wasn't trying to think or set my own	08:33:48

1 timelines for this process. 08:33:50

2 Q Okay. And we can certainly talk about 08:33:51

3 that later. But just starting at the, sort of, 08:33:54

4 basics of this process. 08:33:57

5 To your knowledge, was there anyone 08:33:59

6 working for the Senate majority also working on 08:34:00

7 drawing a congressional map? 08:34:03

8 A Senator McColley. 08:34:07

9 Q Right. And anyone else besides that? 08:34:11

10 A Anyone -- can you say that again? Anyone 08:34:12

11 else working as a staffer or did you say anyone? 08:34:19

12 Q So -- sorry. I should rephrase. 08:34:22

13 Was there anyone -- 08:34:24

14 A Thank you for repeating the questions for 08:34:25

15 me. I appreciate it. 08:34:26

16 Q Oh, no. Totally fine. Happy to. 08:34:27

17 So was there anyone besides Senator 08:34:29

18 McColley who worked for the Senate majority who 08:34:34

19 was working on a congressional map? 08:34:36

20 A Well, I think I previously mentioned 08:34:38

21 President Huffman. 08:34:41

22 Q Okay. 08:34:44

23 A Those are the mains ones. I mean, I -- 08:34:49

24 I'm not -- I'm sure other people -- eventually the 08:34:51

25 bill was a legislatively enacted bill. So there 08:34:55

1 were committee hearings. There were Joint 08:34:58  
2 Committee hearings. There were testimony. So I'm 08:35:00  
3 sure there were a number of other staff that 08:35:02  
4 helped in that traditional process. 08:35:05  
5 If you want me to itemize those, I can 08:35:07  
6 certainly try to. 08:35:10  
7 Q Sure thing. Yeah, let's probably back up 08:35:11  
8 a little bit. I think we're coming back to this 08:35:13  
9 issue of the meaning of "work," right? 08:35:16  
10 So I think -- specifically the work of 08:35:19  
11 using a computer program to draw district lines, 08:35:22  
12 was there anyone else working for the Senate 08:35:28  
13 majority who was doing that besides you? 08:35:33  
14 A I'm -- I believe I was the only one that 08:35:35  
15 had Maptitude, which was the software program we 08:35:41  
16 previously discussed that was used. 08:35:47  
17 So I'm unaware of anybody else that had 08:35:48  
18 that, but it doesn't mean that somebody didn't. 08:35:51  
19 Q Sure. And so just -- and so just to 08:35:55  
20 confirm, Senator McColley, did he work in 08:35:58  
21 Maptitude? 08:36:05  
22 A I can't speak to what he did all the time, 08:36:06  
23 but when I was working with him, no. 08:36:12  
24 Q Okay. All right. And now let's sort of 08:36:16  
25 expand the group of people that we are talking 08:36:21

1 about here. 08:36:24

2 Were there any other legislative staffers 08:36:28

3 for the Ohio General Assembly working on drawing a 08:36:30

4 map -- actually, strike that. 08:36:33

5 Did you collaborate with any other 08:36:37

6 legislative staffers in drawing a congressional 08:36:39

7 map for this cycle? 08:36:42

8 A And I just want to make sure I understand. 08:36:44

9 You said legislative staff, or are you still 08:36:47

10 asking me about the Senate as previously? 08:36:50

11 Q Legislative staff for the General 08:36:53

12 Assembly. 08:36:57

13 A Well, obviously I mentioned to you that I 08:36:57

14 report to the Chief of Staff of the Ohio Senate, 08:37:00

15 so obviously our Chief of Staff is a legislative 08:37:02

16 staff person. I obviously consulted my in-house 08:37:06

17 legal counsel whenever I thought appropriate, 08:37:12

18 legislative staff person. 08:37:17

19 And then in the House, you know, Blake 08:37:17

20 Springhetti was working in a similar fashion on 08:37:22

21 his own with the Speaker. So, I mean, obviously 08:37:25

22 he is legislative staff but now on the House side. 08:37:28

23 Q Right. And what is Mr. -- 08:37:32

24 Mr. Springhetti's title? 08:37:39

25 A I -- I mean, I refer to him as the budget 08:37:41

1 director, but I do not know if that is his 08:37:45  
2 official title in the House of Representatives. 08:37:48  
3 Q Okay. And he is -- and your understanding 08:37:51  
4 is he is budget director for the House majority; 08:37:52  
5 is that right? 08:37:55  
6 A Yes, he has the same position as I do for 08:37:55  
7 the House majority. 08:37:58  
8 Q Right. Yeah. Okay. And did you 08:37:59  
9 collaborate with anybody else aside from that? 08:38:06  
10 A You're still talking about legislative 08:38:08  
11 staff? 08:38:19  
12 Q Yeah, legislative staffers. Sorry about 08:38:19  
13 that. 08:38:22  
14 A Yeah, again, collaboratives -- you know, 08:38:22  
15 the Senate worked -- we worked on -- I worked with 08:38:24  
16 Senator McColley. 08:38:28  
17 Q Right. 08:38:29  
18 A Blake worked on his side, and we were not 08:38:30  
19 collaborating and we were not working together on 08:38:31  
20 that. 08:38:34  
21 So those are the ones that come to mind 08:38:38  
22 right now -- 08:38:41  
23 Q Okay. 08:38:41  
24 A -- I'm sure the House Chief of Staff, I -- 08:38:41  
25 was involved in the process as well. 08:38:45

1 Q Yeah. While you were drawing 08:38:46  
2 congressional maps -- strike that. 08:38:51  
3 Did you ever communicate with John Morgan 08:38:57  
4 about the subject of drawing congressional maps in 08:39:00  
5 Ohio for this cycle? 08:39:03  
6 MR. McGUIRE: Objection. We're going to 08:39:05  
7 invoke the legislative privilege. We believe 08:39:07  
8 those -- any communications by Mr. DiRossi as a 08:39:10  
9 member of the Senate, President's staff are an 08:39:13  
10 integral part of the deliberative and 08:39:17  
11 communicative process work of the General 08:39:19  
12 Assembly. 08:39:22  
13 Don't answer that question. 08:39:22  
14 BY MR. KLEIN: 08:39:24  
15 Q Okay. And the same question but for Clark 08:39:26  
16 Benson? 08:39:29  
17 MR. McGUIRE: The same objection. We 08:39:30  
18 object and invoke the legislative privilege. 08:39:32  
19 Don't answer that question. 08:39:35  
20 BY MR. KLEIN: 08:39:51  
21 Q Okay. So let's talk about your 08:39:51  
22 collaboration with the Chief of Staff. Did you 08:39:52  
23 have any discussions with the Senate Chief of 08:39:55  
24 Staff about the drawing of congressional maps? 08:39:59  
25 A Yeah, I mentioned our Chief of Staff's 08:40:06

1 name because I did talk to -- talk to John, but it 08:40:09  
2 was never about the construction of districts or 08:40:11  
3 it was never about the shape -- the shape or the 08:40:15  
4 approach that I was taking. 08:40:17

5 MR. McGUIRE: Well, don't -- again, I'm 08:40:19  
6 going to instruct my witness not to get into the 08:40:21  
7 substance of any communications he had with 08:40:23  
8 General Assembly members or other staff members 08:40:26  
9 representing General Assembly members, as they are 08:40:29  
10 legislatively privileged as an integral part of 08:40:33  
11 the deliberative and communicative process and the 08:40:36  
12 work of the General Assembly. 08:40:39

13 BY MR. KLEIN: 08:40:56

14 Q Okay. So let's -- let's at least -- 08:40:58  
15 rather than the substance of those conversations, 08:41:00  
16 let's -- maybe we'll talk about when those 08:41:03  
17 conversations took place. 08:41:05

18 Do you remember when you had conversations 08:41:06  
19 related to congressional redistricting with the 08:41:08  
20 Chief of Staff of the Senate? 08:41:13

21 A I cannot recall a specific date of any 08:41:22  
22 specific conversation, no, but -- no. 08:41:25

23 Q So let's talk about your work with 08:41:34  
24 Mr. Springhetti. 08:41:41

25 So you said you worked together a bit. 08:41:42

1 Did you collaborate on the drawing of maps? 08:41:50

2 A I -- I will speak for me, and Blake can 08:41:52

3 speak for himself. When I was instructed as a 08:41:58

4 staff person to work with my senator, Senator 08:42:01

5 McColley, I worked with Senator McColley and 08:42:04

6 President Huffman and not with the House. 08:42:06

7 Q Okay. And so was there any instance where 08:42:08

8 you and Blake Springhetti drew a map together? 08:42:14

9 A No. 08:42:23

10 Q Okay. So what was -- back up. 08:42:24

11 So I think you mentioned you did discuss 08:42:52

12 congressional redistricting with Mr. Springhetti; 08:43:00

13 is that right? 08:43:05

14 A I did have conversations with him, yes -- 08:43:05

15 Q Okay. 08:43:07

16 A -- mostly about the logistics of 08:43:07

17 processing a bill through the General Assembly. 08:43:09

18 Q Okay. So do you remember the -- following 08:43:11

19 when you started work on the congressional maps in 08:43:15

20 mid-October, do you remember the first 08:43:17

21 conversation you had with Mr. Springhetti on the 08:43:18

22 subject of congressional maps? 08:43:21

23 A I don't remember a conversation that I 08:43:27

24 would say was the first -- the first conversation. 08:43:29

25 And I don't remember a specific date of a 08:43:33

1 conversation I had. 08:43:35

2 Q Okay. Well, let's just -- 08:43:39

3 A Like I said before -- and -- sorry. I was 08:43:41

4 working with Senator McColley, and he was working 08:43:44

5 with whoever the sponsor of the bill in the House 08:43:48

6 was. And those were the silos we were working in, 08:43:50

7 and we were both, I assume, focused on the -- 08:43:54

8 that, not working together. 08:43:56

9 Q Okay. So what conversations do you recall 08:43:58

10 with Mr. Springhetti? And we can go through them 08:44:02

11 one by one. So -- 08:44:06

12 MR. MCGUIRE: Objection. Those -- we're 08:44:08

13 going to object on the basis of legislative 08:44:12

14 privilege. Discussions between Mr. DiRossi and 08:44:14

15 Mr. Springhetti as another member of the staff of 08:44:17

16 General Assembly are integral and part of the 08:44:19

17 deliberative and communicative process and the 08:44:22

18 work of the General Assembly. 08:44:25

19 Don't answer that. 08:44:27

20 BY MR. KLEIN: 08:44:36

21 Q Let's change gears a little bit there. 08:44:36

22 Where did you draw congressional maps this 08:44:48

23 cycle? 08:44:55

24 A Well, the -- I mean, help me -- with 08:44:56

25 drawing, I mean, there's thought processes and 08:44:59

1 conversations that go into that that happened in 08:45:03  
2 the State House, in my Senate office. But I also 08:45:04  
3 had, you know, an office where I had the software. 08:45:11  
4 To which or all are you referring? 08:45:17  
5 Q So I guess where was the office where you 08:45:25  
6 had the software? We'll start there. 08:45:26  
7 A The office where I had the software was in 08:45:29  
8 the William Green Building. 08:45:35  
9 Q Okay. And by -- just to confirm, by the 08:45:37  
10 "software," what are you referring to there? 08:45:41  
11 A It's Maptitude. It's a Caliper 08:45:44  
12 Corporation, Maptitude. 08:45:50  
13 Q Okay. And we can get into those specifics 08:45:50  
14 in a little bit, but -- 08:45:52  
15 A Sure. 08:45:53  
16 Q So you did not have Maptitude on any other 08:45:54  
17 devices aside from the computer in your office? 08:45:57  
18 A Correct. 08:46:00  
19 Q Okay. 08:46:00  
20 A Well, when you say "office," you're 08:46:05  
21 referring to the office in the William Green 08:46:07  
22 Building. I obviously had an office in the 08:46:09  
23 Senate. 08:46:13  
24 Q Hm-hm. 08:46:13  
25 A So just to keep the terms "offices" 08:46:14

1 separate. 08:46:16

2 Q Right. Of course. So you did not have 08:46:16

3 Maptitude in the computer or any device in your 08:46:20

4 Senate office -- 08:46:22

5 A Correct. 08:46:22

6 Q -- correct? 08:46:23

7 And so is it fair to say that your work 08:46:24

8 of -- actually draw -- actually, strike that. 08:46:29

9 Sorry. 08:46:32

10 Your work in Maptitude, it only took place 08:46:33

11 at the William Green Building; is that right? 08:46:38

12 A Well, the use of the software took place 08:46:41

13 in the William Green Building because that's where 08:46:43

14 it was, but I met with Senator McColley in his 08:46:46

15 State House office numerous times to get his 08:46:49

16 thoughts. 08:46:52

17 And so, as I said, that was more important 08:46:52

18 than just using the software. That was his 08:46:55

19 thoughts and direction. And that was in the State 08:47:00

20 House. 08:47:07

21 Q Okay. And aside from those two locations, 08:47:07

22 were there any other places where you did work 08:47:09

23 related to congressional redistricting? 08:47:12

24 A Well, certainly phone calls. So I don't 08:47:17

25 know how you situs that, but Senator McColley and 08:47:19

1	I spoke by phone a number of times.	08:47:24
2	Q Okay. And this -- and so this office at	08:47:27
3	the William Green Building, is that the same place	08:47:30
4	where you drew state legislative maps?	08:47:32
5	A Well, as we said in the previous	08:47:35
6	deposition, the work -- using your term --	08:47:40
7	happened in a lot of places, but the William Green	08:47:43
8	Building was the location where my computer that	08:47:47
9	had the software on it was.	08:47:48
10	Q Okay. And so sitting here -- you can	08:47:50
11	strike that.	08:48:01
12	When you're at the computer where you're	08:48:01
13	working in Maptitude, did you have one monitor or	08:48:06
14	more than one monitor for that computer?	08:48:12
15	A Yes -- well, I guess you asked two	08:48:15
16	different questions there. I had two, so I had	08:48:21
17	more than one.	08:48:24
18	Q Okay. So you had two monitors set up.	08:48:25
19	And these are both monitors at your desk, right?	08:48:27
20	A They are on a -- well, "desk" might be a	08:48:32
21	very favorable term for a six-foot folding table.	08:48:35
22	Q A six-foot -- okay. Fair.	08:48:39
23	And so -- and are these monitors set up	08:48:41
24	horizontally?	08:48:45
25	A Yes.	08:48:49

1	Q Okay. And they were side by side; is that	08:48:49
2	correct?	08:48:53
3	A Yes.	08:48:53
4	Q And when you were at the William Green	08:48:55
5	office that we just spoke about, did anyone else	08:49:02
6	work in there day to day?	08:49:04
7	A Well, as I alluded to and maybe said	08:49:06
8	before, the legislative process -- and I was going	08:49:16
9	back in and doing a lot of finance work post	08:49:18
10	legislative, so my time was split a lot more	08:49:21
11	evenly between the State House and the William	08:49:27
12	Green Building. So I'm not even sure I would say	08:49:30
13	that I was there day to day.	08:49:33
14	Q Okay. That's fair. I guess let's say,	08:49:34
15	instead of day to day, was there anyone else who	08:49:36
16	worked in that office on at least a weekly basis?	08:49:43
17	A Well, Blake obviously was there when he	08:49:46
18	needed to be there and at the Riffe Center when he	08:49:54
19	had other duties.	08:49:58
20	Q Okay. So Blake also had a desk in that	08:49:59
21	office?	08:50:02
22	A Again, you're being very favorable with	08:50:02
23	the term "desk," but I'll say yes.	08:50:08
24	Q Right. So I guess Blake also had a	08:50:11
25	six-foot folding table?	08:50:14

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1	A Yes.	08:50:15
2	Q And were these two separate six-foot	08:50:15
3	folding tables?	08:50:18
4	A Yes.	08:50:19
5	Q Okay. So at least you had that.	08:50:19
6	And so were you and Blake ever in that	08:50:21
7	office at the same time?	08:50:30
8	A Ever?	08:50:34
9	Q Mm-hm.	08:50:34
10	A Yes.	08:50:35
11	Q Okay. All right.	08:50:35
12	A Much more so in the legislative process,	08:50:39
13	like -- like we discussed. Not so much in the	08:50:41
14	congressional process.	08:50:45
15	Q Okay. Not so much in the congressional	08:50:45
16	process. But it did happen from time to time	08:50:48
17	during the congressional process?	08:50:50
18	A Yes.	08:50:57
19	Q Okay. All right. And while you were in	08:50:57
20	the office together, did you ever talk to one	08:51:00
21	another.	08:51:05
22	A Yes.	08:51:05
23	Q Okay. Do you remember any specific dates	08:51:05
24	of conversations?	08:51:12
25	A I don't remember specific dates of	08:51:18

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1	conversations.	08:51:19
2	Q Okay. Do you remember any conversations	08:51:24
3	in that office that took place between you and	08:51:26
4	Mr. Springhetti and someone else?	08:51:31
5	A I'm trying to pay attention to your -- can	08:51:39
6	you ask that again, please.	08:51:41
7	Q Sure.	08:51:42
8	Do you recall conversations at that office	08:51:42
9	that took place between you, Mr. Springhetti, and	08:51:43
10	anyone else?	08:51:45
11	A Yes.	08:51:45
12	Q Okay. And who else did you have	08:51:50
13	conversations with in that vain?	08:51:52
14	A I can recall a meeting that took place in	08:51:53
15	November --	08:52:01
16	Q Okay.	08:52:03
17	A -- that Blake and I were in attendance at	08:52:04
18	the William Green Building with the President and	08:52:07
19	the Speaker and the two Chiefs of Staff.	08:52:10
20	Q And when you say the two Chiefs of Staff,	08:52:14
21	who are you referring to there?	08:52:17
22	A The ones I referred to previously: the	08:52:18
23	Senate Chief of Staff, John Barron, and the House	08:52:21
24	Chief of Staff, Christine Morrison.	08:52:24
25	Q So this was a -- just to confirm, this was	08:52:27

1 a conversation concerning congressional 08:52:36

2 redistricting, correct? 08:52:40

3 A It was. 08:52:40

4 Q Okay. And do you recall any other 08:52:41

5 conversations at the William Green Building with 08:52:45

6 you, Mr. Springhetti, and anybody else? 08:52:50

7 A I mean, there were -- there were some 08:52:51

8 conversations with counsel at the William Green 08:52:58

9 Building. 08:53:17

10 We used -- in-house counsel helped us on 08:53:17

11 the legislative stuff in October putting together 08:53:20

12 the legal descriptions for the legislative stuff. 08:53:22

13 So I recall that. That was a multi-week, very 08:53:26

14 intricate process with a lot of meetings and a lot 08:53:30

15 of conversations. 08:53:33

16 Q Okay. 08:53:34

17 A I would like to forget that, but I do 08:53:34

18 still remember it. 08:53:37

19 Q Okay. 08:53:41

20 A Not a fun process. 08:53:41

21 Q Yeah. So aside from those conversations 08:53:43

22 with counsel and the one that we've just 08:53:46

23 discussed, do you recall any other conversations 08:53:48

24 between you, Mr. Springhetti, and anybody else? 08:53:49

25 A I mean, obviously in the legislative 08:53:51

1 process in that -- the William Green Building, we 08:53:57  
2 talked about that in a previous deposition. 08:54:00  
3 MR. McGUIRE: If I can interject to try to 08:54:02  
4 help this along a little bit. Mr. DiRossi, I 08:54:04  
5 believe that Mr. Klein is focused on conversations 08:54:08  
6 that would have been during the congressional 08:54:09  
7 redistricting process. So I don't think you need 08:54:11  
8 to revisit the stuff for the State legislative. 08:54:13  
9 MR. KLEIN: Took the words right out of my 08:54:17  
10 mouth, Mr. McGuire. 08:54:19  
11 MR. McGUIRE: Thank you. 08:54:24  
12 BY MR. KLEIN: 08:54:24  
13 Q Okay. So -- and when you were working in 08:54:24  
14 the William Green Building, do you recall what 08:54:32  
15 sort of computer you had? 08:54:34  
16 A I -- generally, it's a PC. 08:54:35  
17 Q Okay. And do you know the brand? 08:54:42  
18 A I don't know the brand. 08:54:50  
19 Q That's all right. 08:54:51  
20 And did you attend any regular -- sorry. 08:54:56  
21 Strike that. 08:54:56  
22 Did you attend any regularly scheduled 08:55:02  
23 meetings concerning congressional maps? 08:55:05  
24 A Regularly scheduled meetings? Not that I 08:55:08  
25 recall, no. 08:55:14

1	Q Okay. Were there any regularly scheduled	08:55:14
2	phone calls?	08:55:16
3	A (Inaudible.)	08:55:17
4	Q Okay. And while you were working --	08:55:22
5	A No. Sorry. I was shaking my head. I	08:55:23
6	meant to say no.	08:55:27
7	Q Oh, right. Sorry. Yeah, just for the	08:55:28
8	record --	08:55:29
9	A I remembered my previous instructions.	08:55:29
10	Sorry about that.	08:55:31
11	Q Yeah, I also missed it as well, so that's	08:55:32
12	on me, too.	08:55:34
13	MR. KLEIN: So we'll just note for the	08:55:35
14	record that he shook his head to indicate "no."	08:55:36
15	BY MR. KLEIN:	08:55:41
16	Q And so while you were working on the	08:55:41
17	congressional maps, did you communicate with	08:55:44
18	anyone via text message about congressional	08:55:47
19	redistricting?	08:55:51
20	A Well, again, about congressional	08:55:53
21	redistricting, I guess that broad of a question,	08:55:58
22	I'd say yes.	08:56:00
23	Q Okay. Do you recall what text messages?	08:56:01
24	A It was almost exclusively about the	08:56:10
25	logistics, time -- time -- you know, what I was	08:56:13

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1 working on, how I was proceeding, timelines, and 08:56:18  
2 then asking if people would be available for 08:56:22  
3 in-person meetings. 08:56:25

4 Q And do you recall who those text messages 08:56:27  
5 were with? 08:56:29

6 A It would have been President Huffman 08:56:32  
7 and/or Pres- -- President McColley -- Senator 08:56:34  
8 McColley. 08:56:41

9 Q Okay. 08:56:41

10 A But, again, those were text messages of -- 08:56:41  
11 along the lines of "Hey, are you free later for a 08:56:44  
12 meeting or a phone call or something?" 08:56:47

13 Q Yeah. 08:56:50

14 A Nothing substantive. 08:56:51

15 MR. KLEIN: So speaking for a moment to 08:56:52  
16 Mr. McGuire. We'd like to have those -- we would 08:56:55  
17 like to have those produced if you can. I don't 08:57:00  
18 believe we've had that yet. But speaking to those 08:57:03  
19 text messages that Mr. DiRossi just referred to. 08:57:06

20 MR. MCGUIRE: I mean, I'm -- just for the 08:57:11  
21 record, I have not been involved. We've got a lot 08:57:13  
22 of folks, as you might imagine, under this drill 08:57:15  
23 we're all in working on various pieces of this 08:57:18  
24 thing. 08:57:20

25 I have not been involved at all in the 08:57:20

1 document production, and I can't speak to 08:57:23  
2 whether -- potentially we have produced those. I 08:57:25  
3 just don't know. I mean, I'm -- I'm not the 08:57:30  
4 person to speak to what is or isn't encompassed 08:57:32  
5 within agreements about what would be produced, 08:57:36  
6 but I hear what you're requesting the record. 08:57:39  
7 MR. KLEIN: All right. I think we have 08:57:42  
8 folks from Nelson on as well, I believe. 08:57:43  
9 MR. McGUIRE: Yes, but they're not -- they 08:57:47  
10 don't have speaking parts today. 08:57:49  
11 MR. KLEIN: Oh, right. That's true. 08:57:50  
12 Fair. Well, we'll then connect off line. 08:57:52  
13 BY MR. KLEIN: 08:57:54  
14 Q All right. So did you communicate with 08:57:55  
15 anyone -- strike that. 08:58:02  
16 While you were working on congressional 08:58:03  
17 redistricting, did you commute with -- did you 08:58:05  
18 communicate with anyone via instant message about 08:58:09  
19 congressional redistricting? 08:58:13  
20 A I'd like to think that I'm up to speed on 08:58:16  
21 technology, but help me understand what instant 08:58:21  
22 messaging is that isn't text messaging. 08:58:25  
23 Q Right. So this would usually be a 08:58:28  
24 mess- -- so this would be a message service that 08:58:30  
25 goes to your computer or your laptop, such as 08:58:33

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1 Skype for Business or Lync or something of that 08:58:37  
2 variety. I don't know if some sort of system like 08:58:41  
3 that exists on your end. 08:58:47  
4 A I -- yeah, I'm not sure I know what that 08:58:49  
5 means. I mean, the only time I use like a Zoom 08:58:52  
6 would have been with counsel. 08:58:55  
7 Q Okay. Yeah, I'm not really talking about 08:58:56  
8 Zoom so much as it's a service that allows 08:58:59  
9 messages to be sent directly to your computer. It 08:59:03  
10 will pop up in a little box on your computer. 08:59:07  
11 Does that ring any bells? 08:59:10  
12 A No. 08:59:12  
13 Q I'll move along. 08:59:12  
14 A I'll ask my teenagers. 08:59:15  
15 Q Right. Fair. 08:59:16  
16 And did you communicate about 08:59:19  
17 congressional redistricting through any form of 08:59:23  
18 written communication other than email? 08:59:26  
19 A I don't recall -- I don't recall doing 08:59:36  
20 that, no. 08:59:39  
21 Q Okay. So when you were working on 08:59:40  
22 congressional maps, did you consult any population 08:59:50  
23 data? 08:59:53  
24 A Yes. 08:59:59  
25 Q Okay. And was -- what was the source for 09:00:00

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1 that data or what were the sources for that data? 09:00:05  
2 A The U.S. Census Bureau. 09:00:07  
3 Q Okay. Were there any other sources for 09:00:12  
4 population data that you consulted other than the 09:00:17  
5 data from the U.S. Census Bureau? 09:00:19  
6 A No. 09:00:21  
7 Q Okay. And -- 09:00:21  
8 A None that I can recall, no. 09:00:23  
9 Q Right. And just to confirm, specifically 09:00:26  
10 which tranches of data -- actually -- strike that. 09:00:31  
11 When we're talking about data from the 09:00:38  
12 U.S. Census Bureau, are we talking about the 09:00:40  
13 release from the 2020 results only? 09:00:42  
14 A I'm not sure I understand the question. 09:00:45  
15 Sorry -- 09:00:52  
16 Q Sure. I can definitely rephrase. 09:00:53  
17 So when you were consulting census data, 09:00:54  
18 were you only considering the data that was 09:01:02  
19 released in the last year? 09:01:04  
20 A I -- what I -- yeah, I -- what I am 09:01:06  
21 referring to is, I believe the -- well, the 09:01:13  
22 census -- the 2020 census data was released, given 09:01:16  
23 to the Ohio University, the joint contractor for 09:01:20  
24 the State of Ohio, to put census data and 09:01:25  
25 geography together in our bipartisan legislative 09:01:30

1 task force and provide that information to all 09:01:35  
2 Ohioans to use. 09:01:38  
3 That's -- that's what I'm referring to. 09:01:39  
4 Q Okay. And so in terms of population data, 09:01:41  
5 the stuff that came from the census, was there any 09:01:50  
6 difference between the data you consulted for the 09:01:54  
7 congressional process and the data you consulted 09:01:57  
8 for the State legislative process? 09:02:00  
9 A You're referring to -- are you referring 09:02:03  
10 specifically to population data still? 09:02:05  
11 Q Right. Only population data. 09:02:06  
12 A To my -- my understanding where we start 09:02:08  
13 to get into a little technical area, it was the 09:02:10  
14 same -- the same population data was used for 09:02:12  
15 that. 09:02:18  
16 Q And when you were drawing congressional 09:02:18  
17 maps, did you use any data reflecting the results 09:02:24  
18 of any elections in drawing maps? 09:02:26  
19 A Yes. 09:02:32  
20 Q Okay. And do you recall what those 09:02:37  
21 elections were? 09:02:41  
22 A We had access, as we did during the 09:02:43  
23 legislative process, to federal election results 09:02:51  
24 over the preceding decade and other election 09:02:58  
25 results for statewide elections. 09:03:00

1 Q Okay. And what other election results did 09:03:02  
2 you have access to? 09:03:09  
3 A The ones that we talked about during the 09:03:13  
4 legislative process. I guess those are statewide 09:03:15  
5 partisan election results from the preceding 09:03:18  
6 decade. 09:03:21  
7 Q Okay. And were these only partisan 09:03:22  
8 elections -- sorry. Strike that. 09:03:34  
9 Were this -- was this only partisan 09:03:36  
10 election results that you had access to? 09:03:38  
11 A I believe that's the case, yes. 09:03:40  
12 Q Okay. And what was the source or sources 09:03:47  
13 for this data? 09:03:51  
14 A I think all of those came from the 09:03:52  
15 Secretary of State's election results. 09:03:58  
16 Q Okay. 09:04:01  
17 A And some of them might have come through 09:04:03  
18 Ohio University through the common unified 09:04:06  
19 redistricting data process. 09:04:09  
20 Q Okay. And did you use -- or strike that. 09:04:10  
21 While you were drawing congressional maps, 09:04:17  
22 did you consult partisan indices? 09:04:19  
23 A Yeah, in -- when we were creating the -- a 09:04:22  
24 large number of competitive districts, that 09:04:27  
25 information was helpful to guide us. 09:04:30

1 Q Okay. And do you recall what partisan 09:04:32  
2 indices you had access to? 09:04:38  
3 A Help me understand that question a little 09:04:47  
4 more. 09:04:49  
5 Q Sure. So I'm specifically asking about 09:04:49  
6 which partisan indices you received the data for. 09:04:56  
7 A Okay. If I -- I think I understand. The 09:05:00  
8 federal election results for President of the 09:05:03  
9 United States and the United States Senate were 09:05:06  
10 the ones that we primarily used. 09:05:10  
11 Q Right. But did you have access to -- 09:05:13  
12 well, let's actually back up a little bit. 09:05:18  
13 So you said you used these indices. Do 09:05:21  
14 you know what the source for these indices were? 09:05:24  
15 A I believe the Secretary of State produces 09:05:26  
16 election results for all elections -- well, maybe 09:05:33  
17 not all elections, but statewide elections and 09:05:36  
18 legislative and other races. And I think that's 09:05:39  
19 the source of the results. 09:05:42  
20 Q Okay. But then when you just have the raw 09:05:44  
21 results, you don't have the actual indices, 09:05:47  
22 correct? 09:05:50  
23 A Well, help me understand that also. I'm 09:05:50  
24 sorry. 09:05:59  
25 Q No. No. For sure. Right. 09:06:00

1           So my understanding is that indices --           09:06:03  
2           right? -- they consist of more than one election       09:06:08  
3           typically, correct -- or they exist of the results       09:06:10  
4           for more than one election, correct?           09:06:14  
5           A   Yeah.   Sure.   Sure.   Yeah, if you want to       09:06:16  
6           look at multiple elections -- I mean multiple U.S.       09:06:19  
7           Senate races or multiple presidential election       09:06:22  
8           results, yes, you would have a collection of           09:06:25  
9           multiple results to --           09:06:29  
10          Q   Okay.           09:06:31  
11          A   -- produce an index.           09:06:32  
12          Q   Right.   And so how -- how were those           09:06:33  
13          indexes that you consulted produced?           09:06:39  
14          A   Maptitude -- just like in our legislative       09:06:41  
15          process, Maptitude was able to produce an index       09:06:47  
16          based on those results.           09:06:54  
17          Q   Yeah.   So then -- I guess this makes it a       09:06:55  
18          little easier, right?           09:06:58  
19          The -- your process for obtaining the data       09:07:00  
20          and generating partisan indices was the same as       09:07:03  
21          between congressional and state legislative       09:07:07  
22          redistricting; is that right?           09:07:11  
23          A   I want to make sure I understand that.       09:07:12  
24          Can you say that again --           09:07:13  
25          Q   Sure.           09:07:14

1           A -- so I can... 09:07:15

2           Q Of course. And maybe I can even say it 09:07:16

3 better this time. 09:07:20

4           So your process for generating partisan 09:07:20

5 indices was the same in the congressional process 09:07:28

6 as it was in the state legislative process; is 09:07:31

7 that right? 09:07:34

8           A Yeah, I -- I'm not sure I understand the 09:07:34

9 process of generating. I mean, in the legislative 09:07:37

10 process, as you're, I'm sure, familiar within the 09:07:40

11 previous constitutional section, it directs you to 09:07:46

12 use these. So we had them. 09:07:50

13           So I didn't -- I didn't do anything 09:07:52

14 different or new; I just had them. 09:07:54

15           Q Okay. You just -- yeah. You just had 09:07:56

16 them. All right. 09:07:59

17           Okay. So -- and so you had said that you 09:07:59

18 at least had access to a few indices, correct? 09:08:20

19 Mr. DiRossi? 09:08:25

20           A Well, I had access to election results. 09:08:25

21           Q Right. Right. But that -- 09:08:29

22           A The -- I'm sorry. 09:08:32

23           Q No, no, no. Go ahead. 09:08:34

24           A The index that was used was based on the 09:08:37

25 federal election results that I referenced before, 09:08:40

1 since we were now dealing with federal districts. 09:08:43

2 Q Maybe we'll talk a little bit more about 09:08:45

3 what you used in a little bit, but I think what 09:08:54

4 I'm asking now is just what you were at least able 09:08:56

5 to see. 09:08:59

6 In terms of that, what indexes did you 09:09:02

7 have? 09:09:07

8 A Well, I -- as I said, I had access to all 09:09:07

9 of the election results from the legislative 09:09:18

10 process. 09:09:21

11 Q Right. And, to your knowledge, were those 09:09:26

12 results -- strike that. We can actually come back 09:09:31

13 to this in a little bit. 09:09:38

14 The election data you used -- strike that, 09:09:45

15 actually. 09:09:48

16 The election data that you had, was any of 09:09:49

17 it available at a precinct level? 09:09:56

18 A I believe so, yes. 09:10:03

19 Q Right. Were any of the election results 09:10:04

20 you had not available at the precinct level? 09:10:07

21 A That is a technical question that is 09:10:09

22 probably beyond me. I wouldn't hazard a guess. 09:10:14

23 Q Okay. Was there any partisan election 09:10:17

24 data that you were able to obtain that you chose 09:10:37

25 not to consider in drawing congressional maps? 09:10:39



1 you mean to say that you were not considering 09:12:13  
2 state elections in drawing these districts? 09:12:16

3 A Well, like I was referring to before, 09:12:21  
4 dealing with congressional districts, you're down 09:12:27  
5 to the person and you're not dealing with a 09:12:31  
6 5 percent deviation. So population, balancing out 09:12:33  
7 the districts, trying to reduce splits to both 09:12:37  
8 counties and jurisdictions, trying to make the 09:12:42  
9 districts look visually compact, those are the 09:12:45  
10 primary objectives. 09:12:48

11 The use of the election results we've been 09:12:49  
12 talking about is -- was really used for the 09:12:51  
13 competitive districts. 09:12:54

14 Q Okay. Right. But -- so when we're 09:13:00  
15 talking about this -- strike that. 09:13:02

16 When you are using the election results, 09:13:07  
17 were there any election results that you did not 09:13:12  
18 consider? 09:13:16

19 A I thought I answered that. I mean, we 09:13:16  
20 used federal election results for federal 09:13:22  
21 districts. So that's -- that's what we used. 09:13:25

22 And the other ones we still had, but we 09:13:28  
23 were focused on the federal election results. 09:13:33

24 Q So you were not using state election 09:13:35  
25 results; is that correct? 09:13:39

1           A   Yeah, I'm getting hung up on "using." I           09:13:41  
2           mean, it's not like that drove the process.           09:13:45  
3           It's -- so, yes, we had them, they were loaded on           09:13:47  
4           the computer from the legislative process, but we           09:13:49  
5           were focused on the federal election results.           09:13:52  
6           Q   Right. I guess we'll specify this a           09:13:54  
7           little bit. While you were drawing congressional           09:14:21  
8           maps, did you give any consideration to state           09:14:23  
9           election results at any point?           09:14:25  
10          A   I mean, any consideration? I can't speak           09:14:27  
11          to that. But I'll just reiterate again, we were           09:14:34  
12          focused on federal election results for the           09:14:37  
13          federal districts and thought that was the most           09:14:39  
14          appropriate and reasonable approach to using and           09:14:41  
15          promoting competitive districts.           09:14:46  
16          Q   So it's correct -- just so I'm           09:14:54  
17          understanding correctly. So are -- you were           09:14:59  
18          saying you are not in a position to testify right           09:15:01  
19          now that you gave no consideration to state           09:15:03  
20          elections?           09:15:08  
21          A   Can you say that -- it sounded -- can you           09:15:13  
22          say that again? It was a little hard to hear.           09:15:15  
23                  MR. KLEIN: Sorry. Just one moment.           09:15:20  
24                  BY MR. KLEIN:           09:15:25  
25          Q   So just so I'm understanding correctly,           09:15:25

1 are you not in a position to testify today that 09:15:29  
2 you gave no consideration to state elections in 09:15:31  
3 drawing congressional maps? 09:15:35  
4 MR. McGUIRE: I'm going to object to the 09:15:37  
5 form. 09:15:38  
6 MR. KLEIN: Okay. 09:15:42  
7 MR. McGUIRE: But you can answer. 09:15:43  
8 BY THE WITNESS: 09:15:45  
9 A Yeah, I'm not sure I can answer that. I 09:15:45  
10 almost feel like it's a double-negative or 09:15:48  
11 something. I'm just trying -- 09:15:50  
12 BY MR. KLEIN: 09:15:51  
13 Q Right. Right. 09:15:52  
14 A -- (indiscernible) your answer. 09:15:52  
15 Q Right. I guess we'll phrase it like this: 09:15:56  
16 Is it your testimony that you gave no 09:16:17  
17 consideration to state election results in drawing 09:16:19  
18 congressional maps? 09:16:21  
19 A Okay. I'm -- we're getting closer. Help 09:16:28  
20 me understand "no consideration." I mean, I had 09:16:31  
21 access to them. They were preloaded onto the 09:16:34  
22 computer from the legislative process. But I 09:16:36  
23 chose to -- we chose to focus on the federal 09:16:42  
24 election results that I -- you and I have spoken 09:16:45  
25 about. 09:16:47

1 Q Right. So I guess it's getting an 09:16:47  
2 understanding on what you mean by "focus." 09:16:50  
3 A Okay. Fair. 09:16:54  
4 Q So when you say you primarily gave focus 09:16:55  
5 to federal election results, what do you mean by 09:17:00  
6 that? 09:17:02  
7 A Well, I think if you -- you know, Senator 09:17:07  
8 McColley testified in three different committees 09:17:11  
9 on his bill, and I know he made other public 09:17:12  
10 commentary. And I know President Huffman made 09:17:16  
11 public commentary about the importance of having 09:17:19  
12 competitive districts. 09:17:21  
13 And when I am -- when I am referring to 09:17:23  
14 focusing on the federal election results, I'm 09:17:25  
15 talking about using those to score whether or not 09:17:28  
16 districts were competitive or not. And 09:17:32  
17 ultimately, as you know, we ended up with seven 09:17:34  
18 competitive districts using those -- those 09:17:37  
19 election results. 09:17:39  
20 Q Okay. So did you use -- strike that. 09:17:39  
21 Did you ever use statewide election -- 09:17:49  
22 or -- sorry -- strike that. 09:17:51  
23 Did you ever use state election results to 09:17:53  
24 score whether districts were competitive or not? 09:17:55  
25 A I think -- yeah, like I said, our focus -- 09:18:04

1 my focus was on the federal election results, but 09:18:06  
2 I think I did also look at those because I know 09:18:09  
3 that some other people were using those, and 09:18:11  
4 obviously everybody used very different things to 09:18:13  
5 score districts. 09:18:17

6 But, yes, I think those were also 09:18:19  
7 available and used. 09:18:21

8 Q Right. So just to put a finer point on 09:18:23  
9 that, when you were scoring whether districts were 09:18:27  
10 competitive, you did, at least at some points, 09:18:33  
11 look at state elections, correct? 09:18:37

12 A I mean, after the decision was made -- I 09:18:39  
13 mean, it was a pretty easy decision to use federal 09:18:43  
14 election results for federal districts. It seemed 09:18:47  
15 very rational. Those districts, I mean, deal with 09:18:49  
16 congressional representatives, they go to 09:18:52  
17 Washington, D.C., they're interacting with our 09:18:54  
18 U.S. senators, they're interacting with the 09:18:57  
19 President of the United States. So that decision 09:18:59  
20 seemed very easy to make. 09:19:03

21 And once that was made going forward, as 09:19:04  
22 you and I have talked about, I had access to those 09:19:06  
23 other things and would look at them for 09:19:10  
24 comparison, but it did not impact that decision. 09:19:12

25 Q Okay. So you've mentioned this decision. 09:19:19

1 What is that decision that you're referring to 09:19:24  
2 there? 09:19:27

3 A The decision to use federal election 09:19:27  
4 results to index, score, or whatever terminology 09:19:31  
5 anyone in the world is using at the -- at that 09:19:37  
6 moment, on the competitiveness of the districts. 09:19:39

7 Q Okay. Sitting here, do you have any 09:19:43  
8 reason to believe that federal election data is a 09:19:48  
9 more accurate predictor of federal congressional 09:19:51  
10 races than state election data? 09:19:54

11 A If you're asking me, since we're talking, 09:19:57  
12 I would say absolutely. I mean, the federal 09:20:00  
13 election results, as I just said, these are for 09:20:03  
14 congressional representatives to the United States 09:20:07  
15 Congress. They interact with the United States 09:20:09  
16 senators, they interact with the President of the 09:20:13  
17 United States. 09:20:16

18 I don't know what the state -- somebody 09:20:16  
19 who votes one way for a state auditor on how 09:20:18  
20 they're going to audit a local school district 09:20:21  
21 should impact a congressional district out of 09:20:25  
22 Washington, D.C., that are -- primarily rise and 09:20:28  
23 fall with the winds of the -- of politics in 09:20:30  
24 Washington. It just seems very logical to use 09:20:33  
25 federal election results. 09:20:36

1           So that's my personal -- 09:20:37

2           Q Right. So was there any data you 09:20:42

3 consulted in reaching this conclusion, though? 09:20:44

4           A Well, obviously I -- as we talked about, I 09:20:46

5 had access to all of these data sources from -- or 09:20:54

6 election results, I should say, from the 09:21:00

7 legislative process. 09:21:02

8           Q Right. I'm -- I'm specifically referring 09:21:03

9 to the conclusion that you just stated of federal 09:21:06

10 election results being a better predictor for 09:21:11

11 actual congressional races. 09:21:15

12           What I'm asking is, was there any data 09:21:16

13 that you based that conclusion on? 09:21:20

14           A Again, help me -- help me with data. I 09:21:21

15 told you I had access for the election results 09:21:30

16 from all of these -- from the legislative process. 09:21:33

17           I don't think I had access to any other 09:21:35

18 data, as I -- I'm guessing you're referring to it 09:21:38

19 as. 09:21:41

20           Q Oh. So I understand you had access to the 09:21:41

21 data. I -- the question I'm asking is, did that 09:21:45

22 data lead you to the conclusion that federal 09:21:49

23 election results are a better predictor of 09:21:52

24 congressional results? 09:21:56

25           Actually, strike that. 09:21:56

1 I understand you had access to the data. 09:22:02  
2 The question I'm asking is, did that data lead you 09:22:05  
3 to the conclusion that federal statewide election 09:22:08  
4 results are a better predictor of congressional 09:22:10  
5 results? 09:22:14  
6 A I would not say it led me to that. I 09:22:14  
7 thought it was the right decision. That was the 09:22:17  
8 recommendation that I made, and it -- it cuts both 09:22:19  
9 ways. 09:22:23  
10 And, again, that's -- for certain 09:22:24  
11 districts, it may be -- it may be a good thing, it 09:22:26  
12 may be a bad thing, but it's the right decision. 09:22:29  
13 Q Got it. Okay. All right. So I want to 09:22:35  
14 talk a little bit about Maptitude. 09:22:38  
15 So you already mentioned that you used 09:22:41  
16 Maptitude to draw congressional maps, correct? 09:22:42  
17 A Correct. 09:22:44  
18 Q Okay. And how long have you worked with 09:22:45  
19 Maptitude for in your career? 09:22:47  
20 A Well, I would say the last two election 09:22:51  
21 cycles, but it makes it sound like 20 years, but I 09:22:54  
22 obviously only worked with it for about six months 09:22:57  
23 out of each decade. So -- 09:23:00  
24 Q Right. 09:23:02  
25 A -- the two cycles I used Maptitude. 09:23:03

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	Q	So that's the -- so when you say "the last	09:23:05
2		two cycles," are you including this cycle, 2021?	09:23:11
3	A	Yes, 2021 and 2011.	09:23:15
4	Q	Okay. Thanks.	09:23:16
5		And when you were working in Maptitude to	09:23:22
6		draw congressional maps, you were able to view	09:23:24
7		data related to the districts as you drew the	09:23:26
8		maps; is that correct?	09:23:30
9	A	As we talked about in the legislative	09:23:30
10		process, the data was on my left screen, the	09:23:35
11		geography was on the right screen.	09:23:38
12	Q	Right. Got you. And we're going to	09:23:41
13		rehash a few things from that deposition just to	09:23:45
14		sort of get it on the record here.	09:23:48
15		All right. So you said the data was on	09:23:49
16		your left screen and the geography was on your	09:24:00
17		right screen; is that correct?	09:24:04
18	A	That's --	09:24:04
19	Q	Okay. And --	09:24:05
20	A	-- how I personally set it up, right.	09:24:06
21	Q	Right. And so when you say "geography,"	09:24:08
22		you're talking about the actual map, correct?	09:24:11
23	A	Correct.	09:24:12
24	Q	All right. Okay. And when we're talking	09:24:12
25		about the data, was there more than one data box	09:24:17

1 that displayed data, or was it just one? 09:24:23

2 A I had a -- I mean, I'm not sure of the 09:24:25

3 technical capabilities of Maptitude, but I had it 09:24:30

4 set up with one data view. 09:24:33

5 Q Okay. 09:24:35

6 A One data -- data window. 09:24:35

7 Q All right. So it was only one data 09:24:37

8 window. And that one data window contained all of 09:24:40

9 the data that you were able to see while you were 09:24:51

10 drawing maps; is that right? 09:24:53

11 A Yes. 09:24:55

12 Q And did you always have this data view 09:24:55

13 window open while you were drawing maps? 09:24:58

14 A It was -- it was always there. I didn't 09:25:00

15 use it all the time, but it was always there. 09:25:05

16 Q Okay. So by "always there," you mean that 09:25:08

17 the -- that this window was always open and on the 09:25:13

18 screen, correct? 09:25:16

19 A Yes. I guess why I was -- sometimes I 09:25:17

20 would have another document open that would be 09:25:25

21 over it, and I wouldn't be -- 09:25:27

22 Q Right. 09:25:29

23 A -- able to see that. Yeah. So -- but -- 09:25:29

24 Q Okay. And so was there another window 09:25:32

25 that would show you changes to a district that 09:25:40

1	would occur if you changed district lines?	09:25:44
2	A I am aware that Maptitude has that	09:25:48
3	capability, but I've never used that.	09:25:51
4	Q Okay. But it -- but it is correct that	09:25:54
5	when you change district lines in Maptitude,	09:25:59
6	you're able to see the data changing in the	09:26:03
7	program, right?	09:26:05
8	A Well, if you are specifically referring to	09:26:06
9	the change window, no, I've never used it ever.	09:26:09
10	Q Right. But -- so did you have a way of	09:26:14
11	looking at what changes would result when you	09:26:18
12	changed district lines as you were drawing maps?	09:26:20
13	A Well, like I said, the data window would	09:26:24
14	change any time you made a change to the state's	09:26:29
15	geography.	09:26:32
16	Q Right. So is it correct then that -- so	09:26:33
17	your way of looking at changes to the data	09:26:36
18	associated with change to lines was looking at	09:26:38
19	your one data view window, correct?	09:26:40
20	A When I needed to or wanted to. But that	09:26:42
21	wasn't always what I was doing.	09:26:45
22	Q For sure. For sure. But that would have	09:26:47
23	been your way of looking at the changes if you	09:26:49
24	wanted to?	09:26:52
25	A Yes.	09:26:53

1 Q Okay. And you did, at points, look to the 09:26:55  
2 data to see what changes were made, correct? 09:27:05

3 A Yeah, I mean, the vast -- the vast 09:27:08  
4 majority of the time you're adding -- you're 09:27:10  
5 trying to get these districts, as I referenced, 09:27:12  
6 down to the person without splitting too many 09:27:14  
7 jurisdictions to accomplish that. 09:27:17

8 So any time you add a precinct, a ward, a 09:27:18  
9 township, a city, a county to a district, it's 09:27:23  
10 going to change the population. You've got to, 09:27:26  
11 for me, glance over and see, okay, now I have way 09:27:29  
12 too many people or now I have too few. 09:27:32

13 That's -- 09:27:37

14 Q Okay. 09:27:37

15 A -- that's the value for me, is the 09:27:38  
16 population changes. 09:27:41

17 Q Got you. Okay. And so you were just 09:27:41  
18 referencing counties and cities and putting them 09:27:52  
19 in different districts. In drawing these maps, 09:27:55  
20 you had to consider the lines of subdivisions, 09:28:04  
21 like cities, townships, and counties, correct? 09:28:09

22 A Yes. 09:28:13

23 Q Okay. And did these lines exist in 09:28:13  
24 Maptitude as the program came to you? 09:28:16

25 A I -- I'm trying to answer your specific 09:28:19

1 question. I think the answer is no. 09:28:28

2 Q All right. So did you have to upload 09:28:29

3 specific files with all of these subdivision 09:28:32

4 borders? 09:28:35

5 A I think the Common Unified Redistricting 09:28:35

6 Database, which put geography and population 09:28:41

7 census data together, was put onto the machine. 09:28:44

8 Q Okay. 09:28:50

9 A And I think that's how -- I think that's 09:28:52

10 how the geography got there. I -- 09:28:54

11 Q Right. Yeah, just -- I'm just trying to 09:28:56

12 figure out what you were sort of using here. I -- 09:28:59

13 so I think you already sort of got at this, but do 09:29:02

14 you recall the source for these lines -- or 09:29:07

15 rather -- strike that. 09:29:16

16 Do you recall the source for the files 09:29:17

17 that had the lines of these subdivisions, or, 09:29:19

18 also, was there more than one source? 09:29:23

19 A Well, not to be too technical, but I'm 09:29:25

20 pretty sure the answer to your question is that 09:29:32

21 over the preceding years leading up to the census, 09:29:34

22 one of the deliverables of Ohio University, who 09:29:39

23 was selected on a bipartisan basis to be our 09:29:45

24 contractor to prepare us for the census, was to go 09:29:48

25 through phase one, phase two of the Census 09:29:50

1 Bureau's BBSP, the Block Boundary Suggestion 09:29:55  
2 Project, or process. 09:30:00

3 And I think OU worked with all of the 88 09:30:01  
4 county board of elections to understand the lines 09:30:06  
5 that you're referring to and asked about that -- 09:30:09  
6 where the township lines were, where the precinct 09:30:12  
7 lines were, where the city lines were, where the 09:30:15  
8 county lines were -- they obviously didn't 09:30:18  
9 change -- and work with the Census Bureau to make 09:30:21  
10 sure that everybody was on the same page. 09:30:23

11 And so that is, I think, the answer to 09:30:28  
12 your question of where that came from. It came 09:30:30  
13 from that process. 09:30:32

14 Q Right. So then is it correct to say that 09:30:32  
15 the source for these lines was OU? That's how it 09:30:35  
16 came to you? That's what I'm asking. 09:30:41

17 A Well, I don't think it came from OU. I 09:30:43  
18 think OU was the contractor who provided that 09:30:47  
19 information and took the census information and 09:30:49  
20 married it together and I think delivered it to 09:30:52  
21 the Legislative Service Commission. 09:30:57

22 Q And so while you have Maptitude open, are 09:31:03  
23 you able to see these various subdivision 09:31:05  
24 boundaries? 09:31:09

25 A You can, if they're -- if they're on. 09:31:10

1 Q Right. And did you -- let's actually walk 09:31:13  
2 through them one by one. 09:31:19  
3 So were you able -- were you able to see 09:31:20  
4 counties while you worked in Maptitude? 09:31:23  
5 A Again, if they were on, which I -- I 09:31:24  
6 almost had counties on. You need a good -- 09:31:29  
7 Q Right. 09:31:30  
8 A -- point. 09:31:31  
9 Q Okay. So did you ever have counties off? 09:31:32  
10 A I am sure at some point, yes, counties 09:31:36  
11 would have been off, but... 09:31:39  
12 Q Okay. Is there a specific part of this 09:31:45  
13 process where you want to turn counties off? 09:31:47  
14 A Oh, boy. So when I was -- after the 09:31:49  
15 Senate Democrats and the House Democrats had 09:31:56  
16 introduced their proposals, I was trying to 09:31:59  
17 recreate those on my computer by recreating those 09:32:02  
18 districts. And so to do that, I was trying to 09:32:06  
19 recreate it, and I had counties off for that 09:32:10  
20 process. 09:32:12  
21 Q Got you. Okay. And did you also have 09:32:13  
22 cities on? 09:32:18  
23 A Again, cities -- other layers of 09:32:18  
24 geography, whether it's a precinct, a ward, a 09:32:20  
25 city, a municipal corporation, or a township could 09:32:24

1 be on or off, and I would have them on or off at 09:32:28  
2 various times. 09:32:32

3 Q Right. Yeah, I'm just trying to get a 09:32:32  
4 sense of what generally was -- was on. 09:32:36

5 So you said you almost always had counties 09:32:37  
6 on. Did you almost always have cities on or 09:32:41  
7 municipal corporations, let's say? 09:32:44

8 A No. No. I mean -- no. If you're 09:32:45  
9 creating a district and you're adding five or six 09:32:48  
10 or seven whole counties, I didn't see a need to 09:32:50  
11 have cities and townships and smaller villages, 09:32:54  
12 other municipal corporations on when you're just 09:32:59  
13 adding whole counties and watching the population 09:33:02  
14 numbers. 09:33:05

15 Q Okay. 09:33:05

16 A So at times they were on, at times they 09:33:05  
17 were off. 09:33:07

18 Q Okay. What about -- you also mentioned 09:33:08  
19 city wards. Did you have those on most of the 09:33:11  
20 time? 09:33:13

21 A No, they were off most of the time. But 09:33:14  
22 they were -- I thought they were a useful -- a 09:33:20  
23 useful layer to have. 09:33:21

24 Q How about township borders? The same 09:33:22  
25 question. 09:33:26



1 specifically itemizes counties, townships, 09:34:37  
2 municipal corporations, which I understand to be 09:34:40  
3 cities and unincorporated villages. Those were 09:34:42  
4 the units of geography that I was most focused on. 09:34:45  
5 Those are the ones that I understand and are 09:34:50  
6 provided to us by the bipartisan OU common 09:34:52  
7 redistricting database. 09:34:56  
8 Those are the units. Anything else is -- 09:34:57  
9 and I don't even know what that would be, what 09:34:59  
10 Columbus calls their communities. 09:35:04  
11 Q All right. So let's -- so turning to the 09:35:05  
12 data view. When you were looking at the data 09:35:23  
13 view, were you able to see compactness scores? 09:35:26  
14 A No. 09:35:28  
15 Q Okay. And I think you mentioned you could 09:35:28  
16 see population data there; is that correct? 09:35:30  
17 A Yes. 09:35:33  
18 Q Were you able to see voting age population 09:35:33  
19 for a district in data view? 09:35:37  
20 A No. Well, what -- I didn't have it set up 09:35:40  
21 that way. Again, maybe you could have, but I 09:35:45  
22 didn't. I never used that. 09:35:48  
23 Q Okay. Were you able to view total 09:35:49  
24 registered voters? 09:35:56  
25 A No, I did not use that. 09:35:57

1 Q Okay. What about total population? 09:35:59

2 A Yes. 09:36:02

3 Q Okay. And what about target population? 09:36:04

4 A The way I had it set up is, depending 09:36:11

5 on -- and I know I keep referring to legislative 09:36:15

6 stuff, but a lot of -- you know, this is how the 09:36:17

7 computer was set up. Depending on how many 09:36:19

8 districts you had, 15, 33, or 99, Maptitude would 09:36:22

9 automatically calculate a target population based 09:36:28

10 on the state's population of 11,799,000 and 09:36:31

11 change. 09:36:35

12 And then it would show that number for 09:36:35

13 each district, and it would also show a deviation 09:36:38

14 from that -- from that ideal population, target 09:36:41

15 population. 09:36:45

16 Q Okay. So just to confirm, you could see 09:36:45

17 target population in the data view; is that right? 09:36:47

18 A Well, I -- I -- so target population for 09:36:49

19 congressional districts is -- 09:36:56

20 Q Right. 09:36:57

21 A -- 786,630. I don't think that number was 09:36:57

22 actually visible. The deviation from -- 09:37:00

23 Q Deviation. 09:37:02

24 A -- that number above or below is what I 09:37:04

25 was keying on. 09:37:06

1 Q All right. Thank you for clearing that 09:37:06  
2 up. 09:37:08

3 Was there any data besides that in your 09:37:08  
4 data view window? 09:37:14

5 A I had the federal election result 09:37:15  
6 calculation that was visible for the districts. 09:37:18  
7 That was -- that was also visible. 09:37:23

8 Q Okay. Did you have any other 09:37:24  
9 election-related data in your data view window? 09:37:30

10 A I think the percentage of the 09:37:32  
11 presidential -- the recent presidential election 09:37:40  
12 was visible. I rarely used it. But I think that 09:37:42  
13 was visible, both the Republican candidate and the 09:37:46  
14 Democrat candidate. 09:37:50

15 And then I think maybe leftover from the 09:37:52  
16 legislative process was also on the screen of the 09:37:55  
17 six-year lookback of election results. 09:38:02

18 Q So just to -- just to get some clarity on 09:38:07  
19 that, what are you referring to when you're 09:38:09  
20 talking about the six-year lookback? 09:38:11

21 A So that would be election results from 09:38:12  
22 2020, 2018, and 2016 for state and federal 09:38:19  
23 statewide elections. 09:38:27

24 Q So, just to confirm, that's a partisan 09:38:27  
25 index for all statewide partisan races for those 09:38:31

1 four years; is that right -- or over those four 09:38:36  
2 years? 09:38:38  
3 A Yes. 09:38:40  
4 Q Okay. And do you recall any other 09:38:41  
5 election data that you had displayed? 09:39:13  
6 A No, none that I recall. 09:39:13  
7 Q And the election data you've just 09:39:13  
8 described, was it always visi- -- strike that. 09:39:13  
9 The election data you just described, was 09:39:13  
10 it always in the data pane, or did you ever have 09:39:16  
11 it turned off or made not visible? 09:39:18  
12 A You know, thanks for that question. I 09:39:21  
13 think in some cases, yeah, it was turned off. 09:39:22  
14 Q Okay. And so when you were drawing the 09:39:25  
15 state legislative map, you also were able to view 09:39:46  
16 election data, correct? 09:39:49  
17 A Yes. 09:39:50  
18 Q Okay. Did you ever use an index in the 09:39:53  
19 state legislative context that contained only 09:40:02  
20 state elections? 09:40:05  
21 A Only contained state elections. I can't 09:40:05  
22 recall if one was ever used, like, that would meet 09:40:19  
23 that description. 09:40:22  
24 Q Okay. 09:40:23  
25 MR. KLEIN: So we've been going an hour 09:40:39

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	and 40 minutes. I don't know if folks are looking	09:40:41
2	to take a break now. I'm fine to keep going, ut I	09:40:45
3	also want to be mindful of other.	09:40:49
4	MR. McGUIRE: I mean, I think we wouldn't	09:40:49
5	mind a short break.	09:40:50
6	MR. KLEIN: Okay. How long are you	09:40:51
7	thinking?	09:40:57
8	MR. McGUIRE: Can we be back in five	09:40:58
9	minutes?	09:41:00
10	MR. KLEIN: Five is good.	09:41:01
11	MR. McGUIRE: We'll shoot for five	09:41:02
12	minutes.	09:41:04
13	Hey, can I ask a question --	09:41:09
14	MR. KLEIN: Would you like to stay on the	09:41:11
15	record for that or --	09:41:13
16	MR. McGUIRE: No, no, you're right.	09:41:14
17	MR. KLEIN: Okay. So then let's go off.	09:41:16
18	THE VIDEOGRAPHER: The time is 9:41. We	09:41:16
19	are now off the record.	09:41:22
20	(WHEREUPON, a recess was had.)	09:50:04
21	THE VIDEOGRAPHER: The time is 9:50. We	09:50:04
22	are on the record.	09:50:58
23	MR. KLEIN: So I'd like to pull up Tab 1	09:51:06
24	in the exhibits, and I'd like to mark this as an	09:51:10
25	exhibit.	09:51:10



1 a little bit anyway. 09:52:47

2 So let me sort of -- yeah, I think I have 09:52:47

3 this, right? Yeah. Okay. 09:52:50

4 Is this working all right? 09:52:50

5 It comes out a little bit. 09:53:00

6 So can you see this all right? I'll also 09:53:00

7 zoom out a little bit so you get a fuller window. 09:53:03

8 A It's still very, very -- well, let me just 09:53:08

9 start off by saying this looks nothing like how I 09:53:16

10 was set up. 09:53:18

11 Q Okay. So I think you've already testified 09:53:19

12 that you already -- that you had a data view 09:53:22

13 window on another screen, correct? 09:53:28

14 A Yes. 09:53:30

15 Q Okay. And did that window have any 09:53:33

16 similarity -- I'm not asking about the specific 09:53:40

17 data in there. I'm just asking about the -- sort 09:53:42

18 of the kind of shape and structure of it. Did it 09:53:44

19 have any similarity to what you're looking at in 09:53:47

20 this exhibit? 09:53:51

21 A I mean, this doesn't -- I mean, no. I 09:53:52

22 mean, there is a ton of information here that I 09:53:59

23 never had up on my screen and have no idea what it 09:54:01

24 is. 09:54:04

25 Q Okay. But did the data window you have 09:54:04

1 have a -- have a set of rows with data put into 09:54:09  
2 it? 09:54:14  
3 A I mean, the data view that I had was a 09:54:19  
4 spreadsheet like -- yes, with rows and columns, 09:54:21  
5 but it -- it had very different rows and very 09:54:23  
6 different columns. 09:54:29  
7 Q Got you. Right. But for each column, was 09:54:30  
8 it a specific type of data that was listed -- 09:54:33  
9 actually, we can actually strike that. 09:54:39  
10 Did each column represent a category of 09:54:41  
11 data; for example, total population? 09:54:44  
12 A Well, that's one example of -- 09:54:49  
13 Q Right. 09:54:51  
14 A -- of a column that I had. 09:54:53  
15 Q Okay. And did each row represent a 09:54:55  
16 different congressional district? 09:54:58  
17 A Yes. 09:54:59  
18 Q So in the respect of rows representing 09:55:03  
19 congressional district, columns representing 09:55:07  
20 categories of data, these two data views are the 09:55:09  
21 same, correct? 09:55:12  
22 A Well, as I said, I -- my data view was a 09:55:13  
23 spreadsheet-like thing with rows and columns. 09:55:16  
24 This looks like it has rows and columns, but the 09:55:19  
25 information there within is extremely different. 09:55:22

1 Q Okay. 09:55:26

2 A And that's just the data that I can see. 09:55:26

3 It looks like it goes off -- 09:55:28

4 Q Yeah, it's -- 09:55:30

5 A -- all the way off the end of the screen. 09:55:31

6 Q Yeah, and -- yeah, we'll also take a 09:55:32

7 broader look at that in a minute. 09:55:35

8 But -- so are there any other differences 09:55:36

9 between these two, aside from the data that you 09:55:38

10 see in there? 09:55:41

11 A Well, I mean, that's -- that's the big -- 09:55:42

12 the big part of it. 09:55:51

13 Q Right. 09:55:53

14 A I mean, yes, we're set up with rows and 09:55:54

15 columns. I will agree to that. 09:55:56

16 Q Okay. All right. Okay. 09:55:57

17 And it looks like here we have more than 09:56:07

18 enough columns that could be contained in one 09:56:09

19 window present. Was that also the case for when 09:56:11

20 you were looking at your data view; were there 09:56:14

21 more columns than you could view in a single 09:56:17

22 screen -- 09:56:19

23 A No -- 09:56:20

24 Q -- present in -- 09:56:20

25 A -- I mean, I had very few columns. We've 09:56:21

1 talked about everything that I had. And on some 09:56:24  
2 occasions, I didn't even have all of those. It 09:56:26  
3 was -- 09:56:28  
4 Q Got you. 09:56:28  
5 A I'm not sure what all this is, but... 09:56:29  
6 Q Got you. Right. Yeah. So I thought we 09:56:31  
7 could sort -- we could walk through all these 09:56:43  
8 columns. 09:56:44  
9 So once again, just representing to you, 09:56:45  
10 this came directly from the dot SHP file that you 09:56:47  
11 produced, so this is just based on that and 09:56:51  
12 opening up the data view from that file. 09:56:58  
13 So would you be able to tell us what "ID" 09:56:59  
14 means over here in this column? 09:57:02  
15 A You know, actually, no. This was -- 09:57:04  
16 because I noticed there are 15 IDs, which you 09:57:10  
17 would logically think are the 15 congressional 09:57:13  
18 districts. But if you look a couple columns over, 09:57:16  
19 there is a column that is labeled "District" -- 09:57:18  
20 Q Right. 09:57:18  
21 A -- and that has a -- 09:57:21  
22 Q Right. 09:57:21  
23 A -- number that is also one through 15, and 09:57:22  
24 they are all different. 09:57:25  
25 Q Right. 09:57:26

1 A So I never -- I don't know what "ID" is -- 09:57:27  
2 Q Okay. That's fine. 09:57:28  
3 A -- and I didn't use it. 09:57:30  
4 Q Got you -- 09:57:31  
5 A And I don't know what "ID-1" is. 09:57:32  
6 Q No idea? What about "AREA"? 09:57:35  
7 A Nope. 09:57:37  
8 Q Okay. What about "DISTRICT"? 09:57:42  
9 A "DISTRICT" I had on my screen, yes. I had 09:57:43  
10 the district numbers. 09:57:45  
11 Q And so just to confirm, this column would 09:57:46  
12 describe district numbers? 09:57:52  
13 A For me, yeah. 09:57:53  
14 Q Okay. How about "MEMBERS"? 09:57:54  
15 A No. 09:57:59  
16 Q Okay. What about T-O-T-P-O-P, or TOTPOP? 09:57:59  
17 A Yeah, I mean, you skipped "LOCKED" and 09:58:09  
18 "NAME." 09:58:11  
19 Q Right. 09:58:12  
20 A There's no data in them, but I don't know 09:58:13  
21 what those are and didn't have them. 09:58:15  
22 Q Okay. 09:58:17  
23 A Yeah, TOTPOP or TOTPOP, yeah, total 09:58:17  
24 population of the district. Yes, that was 09:58:21  
25 something that I had. That's the population of 09:58:23

1 the district per the census. 09:58:25

2 Q Okay. How about G20R; any idea? 09:58:27

3 A Nope -- well, I -- I didn't have it as -- 09:58:32

4 I don't think I had it as G20R, but I believe that 09:58:41

5 is saying the general election of 20 for a 09:58:44

6 Republican candidate. I think that's what it 09:58:48

7 means. 09:58:51

8 Q Okay. 09:58:54

9 A G20R. 09:58:54

10 Q Right. And so -- 09:58:56

11 A But I don't -- I don't believe that was 09:58:57

12 one that I had open or had used. 09:58:59

13 Q Right. But is that data that you recall 09:59:01

14 having access to, what's -- what's in this column? 09:59:04

15 A Well, again, here's where -- I don't want 09:59:08

16 get over my skis on technical things, but the 09:59:14

17 data -- the election results that were in there 09:59:16

18 from the legislative process are all still in 09:59:20

19 there. I'm telling you the ones that I used. 09:59:22

20 Just because it's in there and it's exported in a 09:59:27

21 SHP file doesn't mean that I -- I mean, I guess it 09:59:30

22 was in the computer left over from the legislative 09:59:32

23 since I used the same computer, but it doesn't 09:59:34

24 mean I had it or used it. And -- 09:59:36

25 Q Okay. 09:59:39

1 A -- in this case, I'm pretty sure, knowing 09:59:39  
2 what I know about G20R, I did not use it. 09:59:42  
3 Q Okay. How about G20P\_DV? 09:59:45  
4 A So I don't -- General Election 20 09:59:53  
5 President underscore DV, Democrat vote, and 10:00:03  
6 there's probably an RV somewhere. 10:00:08  
7 I mentioned that the recent presidential 10:00:09  
8 election was one of the data points that I had 10:00:15  
9 open on the screen at some time. I don't remember 10:00:17  
10 if it was this specific format or if it was in 10:00:19  
11 a -- it looks like it's raw votes, and I think 10:00:27  
12 mine was a percentage. 10:00:33  
13 Q Okay. Got you. By the way, are you able 10:00:34  
14 to see these columns okay? They look a little bit 10:00:39  
15 blurry on my end, but I don't know about how it 10:00:42  
16 looks for you. 10:00:45  
17 A They're very blurry, and I have my reading 10:00:45  
18 glasses on -- 10:00:49  
19 Q Right. 10:00:49  
20 A -- to help me, and they're still -- 10:00:50  
21 Q Sorry. I'm trying to -- 10:00:53  
22 A No, that's okay. 10:00:55  
23 Q -- make this relatively visible. 10:00:56  
24 A You're doing the best you can from 10:00:58  
25 500 miles away or wherever you are. 10:01:00

1 Q Right. Exactly. So -- I think -- so we 10:01:03  
2 do have a sort of -- so we do have a backup 10:01:07  
3 spreadsheet that we can look at if it -- if it 10:01:10  
4 gets too blurry, so we'll -- we'll -- 10:01:13  
5 A I'll let you know if there's something I 10:01:16  
6 can't make out, but -- 10:01:18  
7 Q Right. Perfect. Please do, because we 10:01:19  
8 can pull it up right away. 10:01:21  
9 So where were -- we were on -- let me pull 10:01:23  
10 up this -- so I think we were last on G20P\_DV, 10:01:28  
11 correct? 10:01:38  
12 A Yes. 10:01:39  
13 Q Did we get to G20P\_RV? I don't think so. 10:01:39  
14 Any sense what that is? 10:01:43  
15 A I think it's the opposite of G20P\_DV. 10:01:44  
16 Q Okay. Can you -- can you expand on that a 10:01:54  
17 little bit? 10:02:04  
18 A Well, the -- I believe the G20P is the 10:02:04  
19 general election or 20 presidential Democrat vote, 10:02:07  
20 and the RV would be the opposite, the general 10:02:11  
21 election from 20 presidential Republican vote. 10:02:14  
22 Q Okay. Got you. Thanks. 10:02:18  
23 And G12P -- or, rather -- I think we're up 10:02:26  
24 to G20P\_TV. 10:02:29  
25 A Yep, I see it. I mean, that -- I -- I 10:02:39

1 haven't done the calculations in my head, even 10:02:41  
2 though I love numbers. I assume that's Republican 10:02:43  
3 vote plus Democratic vote equals TV, total vote. 10:02:46  
4 Q Okay. Got you. 10:02:50  
5 A But, again, not something that I -- you 10:02:51  
6 know, I'm just identifying these for you. Maybe 10:02:53  
7 that's helpful for you or not. I didn't have 10:02:55  
8 these on my display window. 10:02:57  
9 Q Understood. Understood. 10:02:59  
10 Why don't we scroll down to Page 3 on this 10:03:00  
11 PDF. 10:03:03  
12 Let's see how this goes. All right. 10:03:03  
13 So I'm going to represent to you this is 10:03:15  
14 from the same file. We just scrolled over a 10:03:17  
15 little bit, all right? So this is just data a 10:03:20  
16 little bit further down. 10:03:26  
17 Let's start over here on EA51\_DV. Would 10:03:31  
18 you be able to tell us what that is? 10:03:37  
19 MR. MCGUIRE: I'm going to object at this 10:03:38  
20 point. Is this -- are you asking -- I think he's 10:03:40  
21 testified this wasn't the data that he had up in 10:03:43  
22 front of him. And if you're asking him to 10:03:45  
23 speculate and guess as to what certain initials 10:03:48  
24 and numbers may mean, I guess let's be clear about 10:03:50  
25 that. 10:03:54

1 I mean, I think he's told you he 10:03:54  
2 doesn't -- this isn't what he worked with 10:03:57  
3 specifically. I mean -- 10:03:58  
4 MR. KLEIN: Right. Okay. So I'll -- so I 10:04:01  
5 will ask separately if it's something that you 10:04:03  
6 could see. I'm -- I simply am representing here 10:04:06  
7 that this is data that came from within the file, 10:04:08  
8 and I'm asking Mr. DiRossi whether he knows what 10:04:11  
9 this stands for. 10:04:14  
10 BY MR. KLEIN: 10:04:17  
11 Q And if you are unsure, you can simply say 10:04:17  
12 that you're unsure. But that is -- that is what 10:04:19  
13 this is here. I will ask specifically if I ask -- 10:04:21  
14 if it was visible. 10:04:24  
15 So on that note, we were on EA51 -- 10:04:28  
16 actually, let's move over a little bit. EA51\_DV, 10:04:34  
17 would you be able to tell us what that is? 10:04:41  
18 A Well, obviously it's a Democrat vote raw 10:04:44  
19 number of some calculation of the previous data. 10:04:48  
20 I can't recall what that is. I don't believe it's 10:04:50  
21 any -- I know it's nothing I ever used for the 10:04:51  
22 congressional, and it doesn't look very familiar, 10:04:54  
23 like it was used in the legislative. 10:04:57  
24 Q Okay. I think I may -- I think for my own 10:04:59  
25 benefit, I'm going to pull up Tab 2, because I'm 10:05:14

1 actually having a lot of trouble seeing this. It 10:05:17  
2 looked fine on my end. But I think when it opens 10:05:19  
3 up in here, it gets a little bit grainy. 10:05:23  
4 MR. KLEIN: So could we pull up Tab 2 and 10:05:25  
5 mark that as an exhibit. That should be an Excel 10:05:27  
6 spreadsheet. 10:05:31  
7 (WHEREUPON, DiRossi Exhibit No. 2 was 10:05:31  
8 presented to the witness.) 10:06:08  
9 BY MR. KLEIN: 10:06:08  
10 Q All right. So I am representing to you 10:06:09  
11 this is -- this is an Excel spreadsheet extracted 10:06:10  
12 from Maptitude. It shows the same data that we 10:06:16  
13 were just looking at from that data view that came 10:06:19  
14 from the SHP file of the enacted plan that you 10:06:20  
15 produced, okay? 10:06:25  
16 So a little bit more legible here. So 10:06:26  
17 let's scroll back down to the end. So we were 10:06:31  
18 over on EA51. Let's -- we'll go over to EA52 now. 10:06:37  
19 Can you tell us what EA52\_DV is? 10:06:42  
20 A All right. I mean, obviously, it's the 10:06:46  
21 same calculation for some set of election results 10:06:50  
22 being displayed as DV, Democrat vote, RV 10:06:58  
23 Republican vote, TV, total vote. And it's 10:07:03  
24 displaying them in raw numbers as opposed to 10:07:07  
25 percentages, like I would ever look at something 10:07:10

1 at. 10:07:11

2 But I cannot recall what -- EA51 and EA52, 10:07:12

3 what subset of election results those were looking 10:07:16

4 at. 10:07:20

5 Q Okay. Got you. 10:07:23

6 A But I guess to answer your second 10:07:24

7 question, not used in congressional. This is just 10:07:28

8 holdover from legislative stuff, the vast majority 10:07:30

9 of this stuff is. 10:07:34

10 Q Okay. Got you. So this is the same thing 10:07:35

11 here, RV, Republican vote, TV, total vote, 10:07:37

12 correct? 10:07:41

13 All right. How about "POPULATION" here? 10:07:41

14 A Yeah, now population was one -- population 10:07:43

15 was one of the factors that I had in my display 10:07:46

16 window, yes. 10:07:50

17 Q So -- and just to confirm, that is the 10:07:51

18 population for each district, the -- correct? 10:07:57

19 A It appears to be, right. On my screen, I 10:07:59

20 would always be able to see the district numbers 10:08:02

21 because I only had a few columns. You know, here 10:08:04

22 we're looking at -- 10:08:07

23 Q Right. 10:08:08

24 A -- we're into Column BM, which is, you 10:08:08

25 know, probably like, you know, 40 -- the 40th 10:08:11

1 column or 35th column. I never had anywhere near 10:08:15  
2 that, obviously. 10:08:18  
3 So it -- but, yes, those are the 10:08:19  
4 population numbers, and I assume they are 10:08:20  
5 attributable to the map as was enacted. 10:08:23  
6 Q Got you. How about DEVIATION? 10:08:26  
7 A Can you scroll -- I mean, I know the word 10:08:30  
8 "deviation" -- 10:08:33  
9 Q Yeah, sure. 10:08:34  
10 A -- deviation because I mentioned I had 10:08:34  
11 deviation, but it's actually behind your face on 10:08:36  
12 my screen. 10:08:38  
13 Q Oh. It is. Sorry. 10:08:39  
14 A There you go. No, you're good. 10:08:41  
15 Yeah, "POPULATION" and "DEVIATION," yes, 10:08:42  
16 those -- those look like something I -- those look 10:08:44  
17 exactly like I had them on my screen. 10:08:47  
18 Q Got you. And what about "F" -- I think 10:08:49  
19 it's probably cut off there -- but "DEVIATION"? 10:08:51  
20 A Yeah, that doesn't look familiar to me. 10:08:54  
21 It looks like it's a percentage of deviation. But 10:08:56  
22 it is not something that I had -- not something 10:08:59  
23 that I used -- 10:09:05  
24 Q Okay. 10:09:05  
25 A -- in either process. 10:09:05

1 Q How about this one here? It also looks 10:09:07  
2 like it may have been cut off. But "DISTRICT\_N," 10:09:10  
3 any sense? 10:09:18  
4 A You know, I'm just thinking as I'm looking 10:09:19  
5 at it. There are numbers that appear to be one 10:09:20  
6 through 15, so you would logically think that's 10:09:23  
7 some type of identification of the district 10:09:26  
8 numbers. 10:09:28  
9 Q Right. 10:09:28  
10 A I can't see if it matches up with the 10:09:29  
11 previous one that I said was one I had, and it -- 10:09:31  
12 but I -- "DISTRICT\_N" does not -- I don't know 10:09:33  
13 what that is. 10:09:36  
14 Q Okay. How about EA53? 10:09:40  
15 A So EA53 is one I think I know a little 10:09:42  
16 better. This is a holdover from the legislative 10:09:45  
17 process. It is -- when you and I talked before 10:09:47  
18 about looking at election results of the previous 10:09:54  
19 six years, I think EA53 was the one. 10:09:56  
20 And as you'll note, this is showing it not 10:10:01  
21 as a raw number but in a two-digit decimal. So 10:10:03  
22 it's looking more like a percentage would look. 10:10:07  
23 So that's what EA53 is. 10:10:11  
24 Q All right. So just to confirm what we 10:10:14  
25 talked about in -- so just to confirm what we 10:10:16

1 talked about in the last deposition -- right? -- 10:10:22  
2 so this is a partisan index representing all 10:10:24  
3 statewide elections, 2016 through 2020; is that 10:10:27  
4 what you were saying? 10:10:30  
5 A 2016, 2018, 2020 statewide partisan 10:10:31  
6 elections, yes. 10:10:37  
7 Q Okay. All right. 10:10:37  
8 A This came out of a lot of discussions, 10:10:40  
9 most of which I was not part of, with the minority 10:10:42  
10 members of the Senate Democratic Caucus and trying 10:10:46  
11 to find a commonality of some type of indexing. 10:10:50  
12 Q Okay. And when you were doing -- just one 10:10:59  
13 moment. Do you have any sense of what the 10:11:08  
14 significance of the number 53 is here? 10:11:19  
15 A No idea. 10:11:21  
16 Q No idea. Okay. How about -- 10:11:25  
17 A I'm laughing because I've asked myself 10:11:27  
18 that question. I have no idea. 10:11:30  
19 Q Yeah. How about EA? 10:11:32  
20 A I think that's -- I refer to it as 10:11:33  
21 election analysis. I don't know if the creator of 10:11:37  
22 that is what they refer to it as, but that's what 10:11:40  
23 I refer to it as. 10:11:43  
24 Q Right. And so is it the case that if it 10:11:44  
25 has the -- if it has this EA in the title for the 10:11:56

1 category of data, is it always a partisan index, 10:12:01  
2 as you've seen it? 10:12:06

3 A Well, I think everything we're looking at 10:12:07  
4 on the screen, all of these columns are partisan 10:12:15  
5 election results for either one party, Republican, 10:12:17  
6 Democrat, or a total vote, raw votes. So, I mean 10:12:20  
7 they're all -- they're all showing some type of 10:12:25  
8 partisan -- partisan information. 10:12:28

9 Q Right. But your sense here, looking at 10:12:29  
10 EA53, is that this is a partisan index, correct? 10:12:32

11 A Yeah, from the legislative process. 10:12:35

12 Q Okay. And was this visible at any point 10:12:41  
13 when you were drawing congressional maps in 10:12:43  
14 Maptitude? 10:12:45

15 A This was -- this was one of the things 10:12:48  
16 that I referenced I had on my display window at 10:12:50  
17 various times. 10:12:55

18 Q Okay. 10:12:57

19 A Sometimes -- sometimes this stuff was off, 10:12:57  
20 and sometimes it was on. 10:12:59

21 Q Okay. Would you be able to tell -- would 10:13:00  
22 you be able to tell us what specific times it was 10:13:08  
23 on? 10:13:10

24 A Well, again, I think I mentioned before if 10:13:10  
25 you're in southeast Ohio where, as you know, we 10:13:18

1 have some counties that have 14-, 15,000 people in 10:13:21  
2 them, and just for reference point, I know in 10:13:26  
3 Franklin County we have some wards of the City of 10:13:29  
4 Columbus that have over 20,000 people in them. 10:13:32

5 So when you're creating a district or 10:13:36  
6 putting together a district to see if it balances 10:13:38  
7 on population and primarily in a rural area -- and 10:13:40  
8 I'm using the building blocks of a district to be 10:13:48  
9 whole counties -- this is -- this is where I'm 10:13:50  
10 focused on population, and all this other stuff is 10:13:52  
11 probably turned off so I can just focus on the 10:13:54  
12 population. 10:13:57

13 Q All right. So -- so you were -- so do I 10:14:07  
14 understand correctly the times that you had this 10:14:11  
15 off, those were the instances where you were 10:14:13  
16 focusing on population considerations, right? 10:14:15

17 A Well, I just want to be clear. I mean, 10:14:20  
18 sometimes I had it on and didn't use it. And when 10:14:24  
19 I had it off, obviously I wasn't using it. But 10:14:26  
20 just because it was on doesn't mean I was using 10:14:31  
21 it. 10:14:33

22 Q Right. 10:14:34

23 A So, I mean, look, this is one of the 10:14:34  
24 pieces of information that was in my display 10:14:37  
25 window. It's there because it was there for the 10:14:39

1 legislative process, but this wasn't the one -- 10:14:43  
2 especially as you and I have started to talk about 10:14:47  
3 the competitive districts that are in the map that 10:14:50  
4 was adopted by the General Assembly, this wasn't 10:14:52  
5 what I was looking at. 10:14:57

6 Q Okay. Right. Okay. 10:14:58

7 Let's go one over to the right, F\_G20P\_RV. 10:15:03  
8 Do you know what that stands for? 10:15:13

9 A Well, we -- you had previously shown me 10:15:14  
10 G20P\_RV, which I, you know, guessed was the 10:15:16  
11 general election of 20 presidential Republican 10:15:20  
12 vote raw number. 10:15:22

13 I don't know what the F underscore means, 10:15:23  
14 but I do -- I'm smart enough to see this looks 10:15:25  
15 like it's in a percentage number. But I don't 10:15:28  
16 know, and this wasn't something that -- this 10:15:31  
17 wasn't something that I had open or had acc- -- or 10:15:35  
18 had used. 10:15:40

19 Q Okay. So this was -- this was not a 10:15:40  
20 column that was visible in your data view, 10:15:44  
21 correct? 10:15:46

22 A Well, you're showing me F\_G20P\_RV. I did 10:15:46  
23 not have that column, but I did mention to you 10:15:55  
24 that I -- earlier that I had have the Biden 10:15:58  
25 percentage and Trump percentage for the most 10:16:00

1 recent federal presidential election in my display 10:16:03  
2 window. 10:16:06  
3 Q Got you. Okay. 10:16:07  
4 What about F\_EA51\_RV? 10:16:08  
5 A Yeah, these ones that have these prefixes, 10:16:12  
6 I have no idea what they are. I mean, we 10:16:16  
7 previously discussed EA51\_RV, and I've given you 10:16:17  
8 my guess as to what that is or I've said I don't 10:16:22  
9 recall what it is. 10:16:25  
10 F underscore, I don't know -- I don't know 10:16:25  
11 what that is, and it was not something that I had 10:16:27  
12 access to or used. 10:16:30  
13 Q The same answer for this one here, 10:16:32  
14 F\_EA52\_RV? 10:16:37  
15 A Yes. 10:16:38  
16 Q Okay. And so this "IDEAL VALUE," that 10:16:38  
17 would be target population, correct? 10:16:42  
18 A So, Mr. Klein, you are now behind -- can I 10:16:44  
19 ask you to scroll over to the middle -- 10:16:47  
20 Q Of course. 10:16:47  
21 A -- if you're now -- 10:16:48  
22 Q Yes. 10:16:48  
23 A -- behind a visual. Yeah. 10:16:49  
24 Q Absolutely. 10:16:50  
25 A Okay. Thank you. 10:16:51



1 column is. 10:18:22

2 A So, as we talked earlier about federal 10:18:23

3 elections -- using federal elections to produce a 10:18:29

4 number for an index of a district, this is the 10:18:31

5 column that computed that for me. 10:18:33

6 So this is the "FED," federal, and I'm 10:18:36

7 guessing "EA," election analysis. So this would 10:18:43

8 be that score for each of the 15 districts. 10:18:48

9 Q Okay. And just so we're understanding for 10:18:51

10 each specific data point, so here in the first 10:18:58

11 row, it says 56.7, right? So is that the -- is 10:19:01

12 that the average Republican vote share based on 10:19:10

13 this index? 10:19:14

14 A Yes. Yes, it's the Republican index. 10:19:15

15 Q Right. Okay. And the same question going 10:19:21

16 back to EA53. Does that -- does this number in 10:19:24

17 the -- in the first row, 57.88085, does that 10:19:32

18 represent the average Republican vote share based 10:19:37

19 on that index? 10:19:41

20 A I mean, yes, for EA53, it is showing the 10:19:41

21 percentage of Republican scoring using the 10:19:47

22 appropriate election results. 10:19:52

23 Q Okay. And so moving on to the next one, 10:19:56

24 "FEDEA\_RDI." 10:20:06

25 A Yeah, so if you thought I was getting 10:20:08

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1 technical before, hold on -- hold on to your hats. 10:20:11

2 So the previous column that you showed me, 10:20:15

3 FEDEA, which is Column BX as I'm looking at it on 10:20:20

4 my screen, that is showing the percentage -- 10:20:26

5 Republican percentage for the district based on 10:20:30

6 the federal election results. 10:20:32

7 It is making the assumption that R plus D 10:20:34

8 equals 100, in that you're taking out the 10:20:42

9 third-party votes from a district and you are 10:20:46

10 weighting or rounding the Republican vote and the 10:20:52

11 Democrat vote so that they equal 100. 10:20:54

12 Q Okay. 10:20:58

13 A The column you're showing me, BY 10:20:58

14 FEDEA\_RDI, is still including third-party votes 10:21:06

15 represented by the "I" in RDI. 10:21:10

16 So, for instance, it is showing you the 10:21:16

17 Republican vote, but it's also -- R plus D would 10:21:20

18 not equal 100. 10:21:23

19 Q Got you. 10:21:24

20 A So I hope -- I hope that was easy to 10:21:26

21 follow. 10:21:28

22 Q All right. Any sense -- 10:21:28

23 A And it just -- I know what that is, but 10:21:32

24 it's not something I used. 10:21:35

25 Q Oh, sorry. So -- just so I can finish the 10:21:36

1 question, just so I have it on the record. 10:21:38

2 A Oh, sorry. 10:21:40

3 Q So -- 10:21:40

4 A My apologies. 10:21:42

5 Q So we are talking about MULTIPLE\_F. You 10:21:42

6 said you know what that is. Can you tell us what 10:21:47

7 that is? 10:21:49

8 A Oh, no, not MULTIPLE\_F. 10:21:50

9 Q Oh, I -- 10:21:53

10 A The column you're showing me -- I was 10:21:54

11 answering the second part question to the -- that 10:21:57

12 we were going to -- we said we would do for every 10:21:58

13 piece of information. 10:22:01

14 Q Right. 10:22:01

15 A The -- yeah, FEDEA\_RDI is something that I 10:22:02

16 know but I did not use. 10:22:08

17 Q Yeah, okay. Thank you for -- 10:22:09

18 A Now -- 10:22:09

19 Q -- clarifying? 10:22:10

20 A -- on to multiplier. 10:22:11

21 Q Yeah, so this one, MULTIPLE\_F, you're not 10:22:12

22 familiar with what that means? 10:22:15

23 A You are under -- can you zoom -- can you 10:22:16

24 scroll -- 10:22:20

25 Q Yep. Sure. We're going to be getting 10:22:20

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1 into some blank -- 10:22:23

2 A Oh, there you go. Perfect. 10:22:24

3 Okay. MULTIPLE\_F, yeah I -- I mean, it 10:22:26

4 looks like some type of replication of a deviation 10:22:30

5 from target population. But MULTIPLE\_F is not 10:22:34

6 something I would have created or used; I used 10:22:38

7 DEVIATION. 10:22:40

8 Q Got you. And what about DISTRICT\_L? 10:22:41

9 A Your guess is as good as mine. 10:22:46

10 Q Okay. All right. So moving back to two 10:22:49

11 of these indices. So you said -- so it looks like 10:22:54

12 -- you had said EA53 was visible in your data 10:23:01

13 view, correct? 10:23:04

14 A EA53 is what was used in the legislative 10:23:05

15 process, so it by default was on my data view for 10:23:10

16 congressional. 10:23:16

17 Q Okay. And FEDEA was also visible in your 10:23:16

18 data view window? 10:23:21

19 A Yes. 10:23:22

20 Q Okay. Do you recall where these were in 10:23:22

21 relation to one another on your data view window? 10:23:25

22 A Generally. 10:23:28

23 Q Okay. Were they always on the same 10:23:33

24 screen? Did you ever have to scroll to get from 10:23:39

25 one to the other? 10:23:43

1           A No, I didn't have anywhere near that many           10:23:44  
2 columns.           10:23:47  
3           Q Okay. So you could -- so when you were           10:23:47  
4 using these, you could see both at the same           10:23:48  
5 time -- or sorry --           10:23:50  
6           A If -- if they were on.           10:23:52  
7           Q Right. Okay. So if they were on. Right.           10:23:54  
8 That was what I was going to clarify.           10:23:56  
9           So just to, you know, put this question           10:23:58  
10 together -- so if these were on, you could see           10:24:00  
11 them both at the same time, correct?           10:24:03  
12           A If they were on and I was looking for them           10:24:05  
13 and using them. I mean, they -- like I said, they           10:24:07  
14 could have been on and I wasn't using them --           10:24:09  
15           Q Okay.           10:24:11  
16           A -- which happens --           10:24:11  
17           Q Yeah. So let's go through and take a look           10:24:12  
18 at these specific values in here.           10:24:20  
19           So you had mentioned that -- for FEDEA,           10:24:22  
20 we've got a value of 56.7 in District 7.           10:24:26  
21           So that is -- and then over in EA53, we've           10:24:33  
22 got -- we've got 57.8. So does that mean that the           10:24:37  
23 Republican -- does this mean that the average vote           10:24:45  
24 share for FEDEA for Republicans is lower in           10:24:48  
25 District 7 than it would be under EA53?           10:24:54

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1           A Well, that's hard to say because they are 10:24:56  
2 using different -- they are using different races 10:25:06  
3 to produce those things. And you're asking me to 10:25:12  
4 draw a conclusion of what the -- the number is 10:25:15  
5 going forward. 10:25:22

6           I mean, these are all estimations -- past 10:25:23  
7 estimations of past elections. And they are all 10:25:25  
8 very imprecise at predicting the future for so 10:25:30  
9 many different reasons. It's just the best we 10:25:35  
10 have, but they -- 10:25:38

11          Q I'm not asking questions -- 10:25:38

12          A -- use different election results to come 10:25:39  
13 up with their numbers, so it is hard to compare 10:25:40  
14 them directly to each other. 10:25:42

15          Q Right. I'm not asking about the 10:25:44  
16 predictive value for either index. I'm simply 10:25:46  
17 saying what the index tells you about average vote 10:25:49  
18 share for Republicans. 10:25:53

19                 Which of these indexes forecasts a higher 10:26:00  
20 projected Republican vote share for District 7? 10:26:04

21          A Well, if you're asking me is 56.7 more or 10:26:08  
22 less than 57.88, I can answer that question if 10:26:17  
23 that's your question. But I -- but I don't want 10:26:19  
24 to offer that I think that these are using 10:26:23  
25 different election -- elections to produce these 10:26:27

1 numbers, and then to compare them like that is not 10:26:30  
2 something that I would do. 10:26:33  
3 Q Right. So I -- simply what I'm asking -- 10:26:34  
4 I think it's two questions -- right? -- so of 10:26:38  
5 course 57.8 is higher than 56.7, but it is what 10:26:42  
6 these two numbers are telling us, right? What 10:26:46  
7 does 56.7 mean in the context of FEDEA? 10:26:50  
8 A That's your question to me? 10:26:54  
9 Q Yes. 10:26:57  
10 A Okay. What does -- let me make sure I 10:26:58  
11 understand that. 10:27:04  
12 What does 56.7 mean in relation to FEDEA? 10:27:04  
13 Q Right. 10:27:09  
14 A Okay. So I guess I would say that is 10:27:10  
15 using ten years of federal election results that 10:27:19  
16 we previously discussed for President of the 10:27:23  
17 United States and a U.S. Senator to Congress, that 10:27:25  
18 a score for a generic Republican or a generic 10:27:32  
19 Democrat would be about 56.7 percent of the vote, 10:27:39  
20 I guess is the best way I can answer your 10:27:44  
21 question. 10:27:46  
22 Q All right. So that means -- so that under 10:27:46  
23 this index, under FEDEA, a generic Republican 10:27:47  
24 performs worse than the generic Republican would 10:27:55  
25 perform under EA53 for District 7, correct? 10:27:57

1           A   Again, I -- I guess I repeat what I said           10:28:01  
2   before. I -- if you're asking me about the           10:28:07  
3   numbers, obviously 57.8 is a higher number than           10:28:10  
4   56.7 numerically. But I don't feel it's           10:28:15  
5   appropriate to compare those two numbers because           10:28:20  
6   they're using very different -- one is a six-year           10:28:23  
7   lookback, one is a ten-year lookback, one is           10:28:26  
8   federal elections only, which I think is the most           10:28:28  
9   appropriate one, and one is federal and state.           10:28:30  
10           And so I wouldn't compare to then make a           10:28:32  
11   conclusion going forward. That's -- that's beyond           10:28:36  
12   my capability.           10:28:39  
13           Q   All right. So I'll give you a moment to           10:28:41  
14   take a look at each of these districts.           10:28:55  
15           Does it look like there are any -- how           10:29:03  
16   many instances are there where FEDEA is higher           10:29:08  
17   than EA53, the value in FEDEA is higher than EA53?           10:29:14  
18           A   Okay. Well, if you're asking me just to           10:29:21  
19   look at the numbers and tell me which is greater           10:29:23  
20   than or less than, I can do that because I know           10:29:25  
21   basic math. I see -- I see at least one or two --           10:29:28  
22   I think at least one that the FEDEA is higher,           10:29:32  
23   but, again, I don't feel that's appropriate to           10:29:35  
24   cast a judgment on going forward.           10:29:37  
25           Q   Okay.           10:29:43

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1	A I just don't think -- I think you're	10:29:44
2	comparing apples and oranges.	10:29:46
3	And, I mean, just to point out, even	10:30:03
4	though I don't think it's a good comparison,	10:30:04
5	they're almost identical in a number of them.	10:30:07
6	Q Okay. But would you be able to tell me	10:30:10
7	how many districts there are in which FEDEA is the	10:30:16
8	higher of the two?	10:30:20
9	A Well, again, if you want me just to do	10:30:21
10	basic math, we can certainly go through them one	10:30:28
11	by one, and I'll give you the answer. But, again,	10:30:31
12	I'll just say, as I've said before, I don't think	10:30:33
13	it's a fair comparison. They're using very	10:30:35
14	different lookback periods and races --	10:30:38
15	Q Okay.	10:30:40
16	A -- and --	10:30:40
17	Q Yeah. Okay. So with that understanding,	10:30:42
18	we'll just briefly walk through.	10:30:44
19	A Great.	10:30:46
20	Q So comparing for District 4 over here	10:30:46
21	FEDEA and EA53, which one is higher?	10:30:52
22	A Can you move your -- move your --	10:30:57
23	Q Sure.	10:31:03
24	A -- cursor.	10:31:03
25	Thank you.	10:31:05

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1           66 and 67, EA53 is higher --           10:31:05

2           Q Okay. The same question --           10:31:08

3           A -- by one point.           10:31:10

4           Q Right. The same question but for           10:31:11

5           District 9.           10:31:14

6           A 47.7 and 50.3. 50.3 is higher than 47.7.           10:31:15

7           Q Okay. The same question for District 1.           10:31:24

8           A Yeah, E- -- well, obviously, as you can           10:31:27

9           see, FEDEA only goes to one decimal.           10:31:32

10          Q Right.           10:31:34

11          A Whereas, EA53 goes to five decimals. 51.5           10:31:34

12          and basically 51.5, those are identical.           10:31:39

13          Q Right. This is a matter -- all right.           10:31:45

14          So --           10:31:47

15          A I mean, if you want to say which one is           10:31:48

16          higher, I guess -- well, I mean, we're talking           10:31:50

17          about eight -- one -- ten thousandths of a           10:31:52

18          percent. They're identical.           10:31:57

19          Q Is it your understanding that the data for           10:31:59

20          FEDEA was rounded to the nearest tenths place?           10:32:02

21          A I believe that's what I did, yeah. I went           10:32:06

22          to one digit post decimal, and that's what I see           10:32:12

23          on the screen.           10:32:15

24          Q Okay. Thank you.           10:32:15

25          All right. We'll keep moving on for           10:32:20

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1	District 8.	10:32:22
2	A I mean, 62 and 62.4, I mean, I'd say those	10:32:26
3	are about the same, but I guess 62.46 is	10:32:30
4	infinitesimally higher than 62.	10:32:35
5	Q Okay. How about District 2?	10:32:39
6	A 65.1 and 66.7, if you round, they're	10:32:45
7	pretty close, but 66.7 with some rounding would be	10:32:50
8	higher than 65.1.	10:32:54
9	Q Okay. How about -- how about District 14?	10:32:56
10	A Yeah, this one, the differentiation is	10:32:59
11	less than a point. 53.2 compared to 54.13, you're	10:33:02
12	about nine basis points of a percentage	10:33:09
13	difference. 54.13 is higher than 53.2.	10:33:12
14	Q All right. How about District 3?	10:33:15
15	A 30.4 and 29.67, call it rounding. Again,	10:33:20
16	almost -- almost identical. Very similar. FEDEA	10:33:25
17	is higher.	10:33:28
18	Q Okay. How about 6?	10:33:29
19	A 52.9 for FEDEA and 56.3 with rounding for	10:33:31
20	the other one. I mean, this one has -- actually	10:33:40
21	has, you know, three points. That's noticeable.	10:33:44
22	But the EA53 number on the screen is higher than	10:33:47
23	52.9.	10:33:53
24	Q Okay. 15?	10:33:54
25	A I'd call these a tie. 53.7 and 53.88,	10:33:56

1 call it 53.9. I mean, those are two basis points 10:34:01  
2 post decimal difference, but technically, 53.88 is 10:34:07  
3 more than 53.7. 10:34:11  
4 Q Okay. How about 5? 10:34:13  
5 A 58.8 and 60.8 -- again, I'm rounding a 10:34:16  
6 little bit with the five decimal points over 10:34:22  
7 here -- that is about two points difference. So 10:34:24  
8 pretty similar but, you know, two points. 60.8 is 10:34:28  
9 two points higher than 58.8. 10:34:34  
10 Q Okay. How about District 10? 10:34:37  
11 A We've got 52.2 and 53.3 rounding down just 10:34:39  
12 slightly. I mean, that's pretty -- pretty close. 10:34:50  
13 1 point -- 1 points' difference, but the EA53 53.3 10:34:53  
14 is mathematically higher. 10:34:58  
15 Q Okay. How about 13? 10:35:00  
16 A So we're comparing 48.6 and 49.2, 10:35:04  
17 rounding. So now we're a differentiation of 10:35:10  
18 about -- about a half a point. So almost similar 10:35:14  
19 in my thought, but 49.23 is higher than 48.6. 10:35:18  
20 Q Okay. 12? 10:35:25  
21 A Just thinking of the court reporter right 10:35:28  
22 now and probably pulling her hair out. Apologies. 10:35:36  
23 61.3 is the FEDEA number, and it is being 10:35:39  
24 compared to 63.07, roughly 63.1. So you're about 10:35:43  
25 1.8 points different. 10:35:48

1	The EA53 number, 63.07 is a bigger	10:35:50
2	numerical value.	10:35:55
3	Q Okay. And how about 11?	10:35:56
4	A 19.4 and 19.8, these are less than a half	10:35:58
5	a point difference, so -- but comparing them	10:36:05
6	straight up numerically, 19.8 is more than 19.4.	10:36:09
7	Q Okay. Thank you for that.	10:36:15
8	Let's change gears a little bit.	10:36:20
9	MR. KLEIN: We can pull this down.	10:36:26
10	BY MR. KLEIN:	10:36:36
11	Q So going back to your map drawing process,	10:36:36
12	while you were working on the congressional map,	10:36:40
13	did you work on several drafts at the same time,	10:36:44
14	or was there a single master draft?	10:36:46
15	A Well, when Senator McColley was asked to	10:36:48
16	introduce a bill, and I was working directly with	10:36:57
17	him, that was the all-encompassing focus.	10:37:01
18	Q Right. I think I'm asking a more	10:37:04
19	fundamental question, which was just that when you	10:37:15
20	were working on the congressional map, was it one	10:37:17
21	draft you were working on or were there several	10:37:19
22	different drafts of the congressional map that you	10:37:21
23	were working on?	10:37:23
24	A Mostly it was one draft. Absolutely with	10:37:25
25	Senator McColley and -- yes, mostly one draft.	10:37:31

1 Q Right. So did you generate any other 10:37:37  
2 Maptitude files while you were working on 10:37:43  
3 congressional maps other than the one draft? 10:37:46  
4 A There -- I would create other ones that 10:37:48  
5 weren't full documents if I needed to kind of do 10:37:56  
6 some mathematical analysis on an area, like 10:38:00  
7 whether or not a group of counties together would 10:38:03  
8 actually, you know, go together without exceeding 10:38:06  
9 or being too -- under the deviation. 10:38:09  
10 And so I might pull those out, put them in 10:38:15  
11 another map, do those calculations and figure it 10:38:18  
12 out so I wasn't working in the master map. And 10:38:20  
13 then if it worked, I would put it in the master 10:38:22  
14 map. If it didn't, I would just get rid of it 10:38:25  
15 and -- because that didn't work. 10:38:28  
16 Q Right. Okay. But -- so there weren't any 10:38:29  
17 other maps besides the one master map that you 10:38:31  
18 were working on with an intention for it to be 10:38:34  
19 presented? 10:38:36  
20 A Well, there -- 10:38:37  
21 Q To the General Assembly. 10:38:39  
22 A Well, the Senator McColley map, what I 10:38:41  
23 worked with him on, obviously generated a map 10:38:45  
24 file. The map that was ultimately enacted was a 10:38:51  
25 separate -- a separate file because it changed 10:38:54

1 significantly. 10:38:57

2 Q Right. Yeah. And we'll -- and we'll come 10:38:57

3 to that in a little bit. 10:39:01

4 I think starting with that first draft 10:39:04

5 that you're talking about, that was the master 10:39:06

6 draft until it was presented, correct? 10:39:10

7 A Can you say that question again? 10:39:12

8 Q Sure thing. 10:39:15

9 So within that timeline before Senator 10:39:18

10 McColley presented a draft map, the master draft 10:39:25

11 you're describing, that was the only draft you 10:39:29

12 were actually working on, correct? 10:39:31

13 A Well, I was asked to work with Senator 10:39:33

14 McColley. I think we talked about the timeline 10:39:39

15 before in late October -- you know, the last week 10:39:41

16 of October. I had started getting organized and 10:39:44

17 started working in mid-October, I think is what I 10:39:50

18 said, because I can't remember the exact dates. 10:39:52

19 So I had started working on something and, 10:39:56

20 you know, getting organized and making sure I had 10:39:59

21 everything that I needed to go forward. And then 10:40:02

22 I was asked to work with Senator McColley, and 10:40:04

23 then that became my focus and I worked on Senate 10:40:07

24 Bill 258. 10:40:12

25 Q Okay. And so -- and so is it correct that 10:40:12

1 the House majority also presented a -- presented a 10:40:18  
2 map? 10:40:23  
3 A I am aware that there was a map introduced 10:40:24  
4 in the House I think by Senator Oelslager. 10:40:32  
5 Q That's right -- 10:40:36  
6 A Former Senator Oel- -- former Senator 10:40:37  
7 Oelslager. I'll now say Representative 10:40:40  
8 Oelslager -- 10:40:40  
9 Q Right. 10:40:40  
10 A -- apologies. 10:40:43  
11 Q And did you have any -- did you play any 10:40:43  
12 role in creating that map? 10:40:45  
13 A No. 10:40:50  
14 Q Okay. So you mentioned Senate Bill 258. 10:40:50  
15 That's the -- that's the bill presented by Senator 10:40:58  
16 McColley on November 3rd; is that right? That's 10:41:03  
17 the map? 10:41:06  
18 A I don't recall the date of introduction. 10:41:07  
19 Obviously it's part of our legislative General 10:41:12  
20 Assembly record, but that sounds about right. 10:41:15  
21 Q Yeah. Okay. And then you also mentioned 10:41:16  
22 that there was a second draft that was presented 10:41:22  
23 later on by Senator McColley; is that right? 10:41:24  
24 A A second draft that was presented later 10:41:27  
25 on? Is that -- can you say that again -- 10:41:32

1 Q Sorry. Let's back up. You had mentioned 10:41:34  
2 that you had created another Maptitude file for 10:41:37  
3 the version that was ultimately enacted, correct? 10:41:40  
4 A Yes. Yes. 10:41:44  
5 Q Right. And so it's -- that was -- that 10:41:46  
6 was a separate draft from this initial Senate 10:41:53  
7 Bill 258 introduced in, let's say, early November? 10:41:57  
8 A Yes. 10:42:02  
9 Q Okay. Okay. Aside from those two drafts, 10:42:02  
10 were there any other drafts you worked on that 10:42:06  
11 were presented to the General Assembly? 10:42:12  
12 A Well, again, just -- you say "worked on." 10:42:14  
13 I mean, I had -- on my computer I had the Senate 10:42:20  
14 Democrat map that I was, you know, looking at and 10:42:23  
15 trying to understand. I didn't work on it to 10:42:27  
16 create it or help produce it, but I had it. 10:42:29  
17 Q Okay. 10:42:32  
18 A The same thing with the House Democrat 10:42:32  
19 proposal that was offered. I had that file, I was 10:42:38  
20 looking at it, analyzing it, trying to understand 10:42:41  
21 it, but I did not do any work to create it or help 10:42:43  
22 produce it. 10:42:46  
23 Q Okay. So then turning to the original 10:42:47  
24 Senate Bill 258, the map presented in early 10:43:00  
25 November, do you recall when you started work on 10:43:03

1 this specific draft? 10:43:05

2 A I remember -- don't hold me to the exact 10:43:06

3 date, but I think it was October 25th or 26th is 10:43:13

4 when I had my first phone call with Senator 10:43:16

5 McColley that he had been directed to work with me 10:43:20

6 to produce a bill to be introduced. 10:43:24

7 Q Okay. So following that time, was it 10:43:26

8 Senator McColley who primarily supervised your 10:43:38

9 work? 10:43:40

10 A Yeah, he -- he directed me. He did not 10:43:41

11 have access to Maptitude. So without -- you know, 10:43:43

12 he -- it was his bill, his name was on it, he was 10:43:47

13 in charge. 10:43:50

14 Q Okay. And so you -- so you were -- so 10:43:50

15 after that time, when did you send to Senator 10:44:00

16 McColley a draft of the map? 10:44:06

17 A I don't recall ever sending him a copy of 10:44:07

18 it. I met with him in his Senate office and 10:44:16

19 showed him a visual representation of his 10:44:19

20 direction. 10:44:23

21 Q Okay. And do you recall when that meeting 10:44:25

22 was? 10:44:29

23 A Well, it was sometime after October 25th 10:44:30

24 and November 3rd because you said that's when it 10:44:33

25 was introduced. So it was sometime in that six, 10:44:36

1	seven, eight days.	10:44:40
2	Q Do you think --	10:44:40
3	A It was -- it was earlier than that,	10:44:43
4	because he and I went back and forth several	10:44:46
5	times. But -- so it would have been shortly after	10:44:48
6	October 25th, is when I would have showed him a	10:44:51
7	first draft of his thoughts.	10:44:53
8	Q Do you think this was in November?	10:44:55
9	A I can't recall the specific dates, but if	10:44:59
10	you're telling me the bill was introduced on	10:45:04
11	November 3rd, I think I would have shown him	10:45:06
12	something soon thereafter of the 25th or 26th,	10:45:09
13	still in October.	10:45:14
14	Q Okay. All right.	10:45:14
15	So before Senator McColley presented that	10:45:21
16	draft map as the original Senate Bill 258, did you	10:45:25
17	discuss the draft map with anyone besides Senator	10:45:29
18	McColley.	10:45:35
19	MR. McGUIRE: Objection. We're going to	10:45:35
20	assert the legislative privilege that any	10:45:37
21	communications that Mr. DiRossi had with members	10:45:40
22	of the General Assembly, other than Senator	10:45:41
23	McColley, are an integral part of the deliberative	10:45:47
24	and communicative process with the General	10:45:50
25	Assembly and are privileged.	10:45:54

1 Don't answer that question. 10:45:55

2 MR. KLEIN: Okay. I'll say on the record 10:45:56

3 that we disagree with assertion of privilege under 10:45:57

4 Ohio law, but that, you know, even -- even 10:46:02

5 accepting arguendo that that privilege is 10:46:08

6 applicable, it would not apply to who was in the 10:46:11

7 conversation and when the conversation took place 10:46:14

8 and where the conversation took place. 10:46:16

9 So not inquiring as to the substance of 10:46:18

10 this conversation, but, rather, asking if you had 10:46:21

11 discussed the draft map with anyone besides 10:46:25

12 Senator McColley before it was introduced. 10:46:29

13 MR. McGUIRE: Okay. That -- that, he can 10:46:35

14 answer. 10:46:36

15 BY THE WITNESS: 10:46:41

16 A Senator McColley's name was on the bill, 10:46:41

17 he was in charge, but I also did speak to 10:46:43

18 President Huffman about the draft. 10:46:46

19 BY MR. KLEIN: 10:46:48

20 Q Okay. Do you recall when you spoke to 10:46:48

21 President Huffman. 10:46:50

22 A The same time frame, October 25th or 26th 10:46:53

23 is when I was given direction to work with Senator 10:47:00

24 McColley. The days between the 25th and the date 10:47:02

25 you said the bill was introduced on November 3rd 10:47:04

1 would have been -- all these conversations would 10:47:08  
2 have happened in that time frame. 10:47:10

3 Q Okay. Do you recall speaking with anybody 10:47:11  
4 else about the draft map prior to its 10:47:20  
5 introduction? 10:47:21

6 A I would have told Blake that we were doing 10:47:27  
7 this, but never discussing the substance of it, so 10:47:29  
8 that he would be aware. The Chief of Staff of the 10:47:35  
9 Senate, I'm sure, would have -- I would have made 10:47:45  
10 the Chief of Staff aware that I was working on 10:47:48  
11 this. 10:47:52

12 Q Okay. So you had -- so -- 10:47:52

13 A And obviously -- and obviously in -- I 10:47:54  
14 apologize for cutting you off. But in-house 10:47:56  
15 counsel would have been aware of it as well. 10:47:59

16 Q Okay. All right. So you said you spoke 10:48:04  
17 to President Huffman. Was it more than once in 10:48:06  
18 this time period between October 25th and when the 10:48:10  
19 map was introduced? 10:48:13

20 A I can't recall. I remember it being a 10:48:15  
21 very fast process from the first instruction to 10:48:20  
22 work with Senator McColley to introduction, and it 10:48:27  
23 was -- it was an all-time-consuming effort. And I 10:48:29  
24 cannot recall how many times I would have 10:48:33  
25 interacted with the President during that window 10:48:35

1 about it. 10:48:37

2 Q Okay. Did you think it was more than 10:48:37

3 once? 10:48:40

4 A It could have been, but if it was once, it 10:48:40

5 wouldn't shock me. But I -- 10:48:45

6 Q Okay. What about the -- 10:48:47

7 A He was busy doing other legislative stuff, 10:48:49

8 obviously, right? He's not just focused on this. 10:48:51

9 That's Senator McColley's job and mine as a 10:48:55

10 staffer. 10:48:58

11 Q All right. What about the Senate Chief of 10:48:58

12 Staff; did you speak to the Chief of Staff more 10:49:03

13 than once? 10:49:05

14 A I don't recall if I spoke to John more 10:49:05

15 than once during that time. 10:49:12

16 Q Okay. 10:49:13

17 MR. KLEIN: Let's -- let's pull up -- 10:49:19

18 actually, let's -- sorry. Just one second. 10:49:28

19 BY MR. KLEIN: 10:49:40

20 Q So prior to the map's introduction, you 10:49:40

21 mentioned you had showed the draft map to Senator 10:49:42

22 McColley. Did you show it to anyone else? 10:49:47

23 A I remember showing it to President 10:49:49

24 Huffman. 10:50:07

25 Q Okay. 10:50:07

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1           A I cannot recall specifically showing it to           10:50:18  
2 any of the other people I mentioned. It's           10:50:21  
3 possible, but I cannot -- I cannot recall that.           10:50:24  
4           Q So your recollection is, prior to the           10:50:25  
5 draft map's introduction, you showed the draft map           10:50:28  
6 to Senate President Huffman and Senator McColley,           10:50:32  
7 correct?           10:50:35  
8           A Yes. Yes. Those are the two I can           10:50:36  
9 recall. And it was --           10:50:38  
10          Q Okay.           10:50:38  
11          A -- it was a very chaotic time. It --           10:50:41  
12 right -- you -- what was the -- can you -- the           10:50:44  
13 time frame you're talking about again --           10:50:47  
14          Q Right. So from when you were told to work           10:50:49  
15 with Senator McColley on the map --           10:50:52  
16          A Okay.           10:50:54  
17          Q -- and when the map was presented, that's           10:50:54  
18 the -- that's that time frame. Does that change           10:50:58  
19 your answer at all?           10:51:01  
20          A Well, that's the -- you said from the time           10:51:02  
21 I was instructed, which, in my mind, is that           10:51:04  
22 October 25th/26th day. To when?           10:51:07  
23          Q To --           10:51:11  
24          A Help me understand to when.           10:51:12  
25          Q So to when the map was introduced --           10:51:15



1 introduction with the pro- -- the committee 10:52:32  
2 process. I told you -- 10:52:35  
3 Q Right. 10:52:36  
4 A -- it was a very chaotic process. 10:52:37  
5 So the legislative staff would not 10:52:40  
6 probably have seen it before introduction, which 10:52:41  
7 is specifically, I think, what you are asking 10:52:45  
8 about. They would have seen it before the 10:52:46  
9 committee process. So I misspoke there trying -- 10:52:51  
10 Q Right. 10:52:52  
11 A -- to recall this. So thanks for -- 10:52:53  
12 Q That's fair. 10:52:56  
13 A -- clarifying that. 10:52:56  
14 Q So then introduction as we understand it 10:52:58  
15 here -- 10:53:00  
16 A Thank you. 10:53:00  
17 Q -- prior to introduction, do you recall 10:53:01  
18 sharing the map with anyone besides Senate 10:53:03  
19 President Huffman and Senator McColley? 10:53:07  
20 A Like I said, I cannot recall if I 10:53:09  
21 physically showed the map to the Chief of Staff. 10:53:12  
22 The Chief of Staff, as I mentioned, knew this bill 10:53:16  
23 was being introduced. 10:53:19  
24 I can't recall if I shared it with legal 10:53:21  
25 counsel physically, in-house counsel, but in-house 10:53:24

1 counsel knew the map was being drafted or put -- 10:53:27  
2 the bill was being drafted. 10:53:30

3 Obviously LSC, who would have been doing 10:53:32  
4 the drafting for us, we would have provided a 10:53:37  
5 visual of the map to LSC to help them with their 10:53:40  
6 preparation of the LSC analysis. 10:53:44

7 I would have mentioned to Blake that we 10:53:47  
8 were doing this, and I think he reciprocated that 10:53:49  
9 they were doing something similar on their side. 10:53:53

10 I cannot recall if I showed him a physical 10:53:55  
11 copy of the map as a courtesy prior to its 10:53:58  
12 introduction, but that is possible. 10:54:01

13 Those are the -- that's the -- again, 10:54:03  
14 we're talking about a very chaotic six-day period, 10:54:06  
15 seven-day period here. That's what I can 10:54:10  
16 recall -- 10:54:11

17 Q Okay. 10:54:12

18 A -- right now. 10:54:12

19 Q Okay. Did you -- prior to the draft map's 10:54:14  
20 introduction, did you share a draft of the map 10:54:19  
21 with any Democratic elected officials in the Ohio 10:54:22  
22 General Assembly? 10:54:28

23 A So that would not be for me to do. Did I 10:54:29  
24 do that? No. But that would not have been part 10:54:32  
25 of my job duties. That was communication between 10:54:35

1 the President and the other leaders of the 10:54:36  
2 legislature, since we were in a legislative 10:54:40  
3 process. So I can't -- 10:54:42  
4 Q Yeah, is -- 10:54:45  
5 A -- speak to that. 10:54:45  
6 Q Is it your understanding that Senate 10:54:47  
7 President Huffman shared this map with any 10:54:49  
8 Democratic elected officials within the Ohio 10:54:51  
9 General Assembly prior to its introduction? 10:54:55  
10 A I know for a fact that later in the 10:54:57  
11 process before this bill was enacted there was 10:55:03  
12 definitely a process to do that. Whether it 10:55:06  
13 happened immediately before the introduction of it 10:55:08  
14 is not information I -- I know. 10:55:11  
15 Q Okay. 10:55:17  
16 MR. KLEIN: Can we pull up Tab 4. And I'd 10:55:17  
17 like to mark this as an exhibit. 10:55:25  
18 (WHEREUPON, DiRossi Exhibit No. 3 was 10:55:25  
19 presented to the witness.) 10:55:44  
20 MR. McGUIRE: What -- Mr. Klein -- 10:55:44  
21 MR. KLEIN: Okay. So -- 10:55:44  
22 MR. McGUIRE: -- number is that? What 10:55:44  
23 number are you up to on deposition? 10:55:45  
24 MR. KLEIN: So I think we are on Exhibit 10:55:49  
25 Number 3. 10:55:52

1 MR. MCGUIRE: All right. 3. Thank you. 10:55:52  
2 BY MR. KLEIN: 10:55:54  
3 Q And we have an email here. I am 10:55:55  
4 representing to you that you -- or, rather, that 10:56:00  
5 your counsel produced this to us from your 10:56:04  
6 custodial data. 10:56:06  
7 Do you recognize this email? 10:56:09  
8 A I do. 10:56:10  
9 Q Have you seen it before? 10:56:11  
10 A Yes. 10:56:13  
11 Q Okay. Can you describe to us who is on 10:56:15  
12 this email. 10:56:19  
13 A So thank you for showing me this. This 10:56:20  
14 jogs my memory a little bit. So maybe a little 10:56:24  
15 bit of history that will help clarify my previous 10:56:27  
16 answer to you. 10:56:31  
17 The introduced version of Senate Bill 10:56:32  
18 258 -- the true introduced version of Senate Bill 10:56:36  
19 258 was language only. It was a placeholder 10:56:42  
20 declaring the intent to enact congressional 10:56:43  
21 districts for the State of Ohio, a fact that I 10:56:48  
22 just forgot and you helped me remember. 10:56:51  
23 That bill was assigned to a committee, and 10:56:54  
24 that committee then had a sub bill, which is the 10:56:58  
25 version you and I have been talking about. When 10:57:03

1 you said "introduced," I should have corrected you 10:57:06  
2 that the introduced version is technically the 10:57:10  
3 placeholder. The substitute bill that did happen 10:57:13  
4 in committee was the first sub bill. 10:57:16

5 Q Right. 10:57:19

6 A And then obviously I'm sure we'll talk 10:57:19  
7 later about a second sub bill that contained the 10:57:22  
8 enacted version. 10:57:25

9 Q Right. 10:57:25

10 A This email was an email that I sent to the 10:57:26  
11 staff of the committee, I believe, that was 10:57:31  
12 hearing the bill and would adopt the sub bill. 10:57:38

13 And it was the draft -- LSC draft of the 10:57:43  
14 language that would have been used as the 10:57:48  
15 substitute to replace the placeholder language. 10:57:52

16 Q All right. So this -- so this language -- 10:57:54

17 A (Indiscernible) clarity to what I said 10:57:58  
18 before. 10:58:01

19 Q Right. Yeah, and thank you for clearing 10:58:01  
20 that up. 10:58:02

21 So this draft would actually explain where 10:58:03  
22 the district boundaries would be in this proposal, 10:58:05  
23 correct? 10:58:08

24 A Well, this is the legislative draft. This 10:58:08  
25 is the L134134 General Assembly dash two version 10:58:12

1 of the sub bill. 10:58:19

2 This would, in words, show and say what 10:58:20

3 units of geography in the state are assigned to 10:58:26

4 what congressional districts. You -- 10:58:28

5 Q Okay. 10:58:30

6 A -- would not be able to look at this draft 10:58:31

7 and visually see districts. This is the legal 10:58:34

8 wording of the districts. 10:58:37

9 Q Okay. And who is this email sent to? 10:58:38

10 A Theresea Varrasso. 10:58:42

11 Q Okay. And what is her position? 10:58:49

12 A I believe she is a legislative aide with 10:58:51

13 one of our office -- she's a legislative aide -- 10:59:01

14 senior legislative aide for one of our Senate 10:59:03

15 offices. 10:59:06

16 Q Okay. Do you have a sense of which Senate 10:59:06

17 office that is? 10:59:08

18 A I think it is in Senator Gavarone's 10:59:09

19 office, but I could be mistaken. 10:59:17

20 Q And you write in the email here, in the 10:59:19

21 first line, "Embargoed until further notice." 10:59:25

22 What do you mean by "embargoed" here? 10:59:29

23 A There was -- it's been the process of most 10:59:35

24 of our committees to distribute information to the 10:59:37

25 committee members, both the Republican members, 10:59:40

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1 the Democrat members, members of the press corps, 10:59:45  
2 members of the public in a unified way so that 10:59:48  
3 everybody gets the information at the same time. 10:59:51

4 And I was giving her this draft on 10:59:54  
5 November 3rd at -- as I'm reading it -- at 3:15 in 10:59:58  
6 the afternoon, roughly, and I'm telling her to 11:00:04  
7 wait for this distribution until we figured out 11:00:06  
8 when it was going to be distributed. 11:00:09

9 Q So you said you were figuring out when the 11:00:30  
10 bill was going to be distributed. What -- what 11:00:33  
11 sort of decision point was still open when it came 11:00:39  
12 to when it was going to be -- when it was going to 11:00:42  
13 be distributed? 11:00:44

14 A Again -- so just remember my role. I was 11:00:44  
15 providing the document to them, their office and 11:00:46  
16 their -- the senators control the committee 11:00:50  
17 process. They made that decision, and I didn't 11:00:53  
18 know what it is, and I just wanted to provide them 11:00:56  
19 the information and said these words "embargoed 11:00:59  
20 until further notice" so that they would not 11:01:04  
21 immediately do it and they would talk to their 11:01:07  
22 chair and talk to the senators of when that 11:01:09  
23 distribution was going to happen. Not my 11:01:11  
24 decision. 11:01:13

25 Q Right. Okay. Got you. 11:01:14

1           So what you're -- so what you're           11:01:15  
2     representing in this email is simply that the --     11:01:17  
3     that the senators that you're working for have     11:01:21  
4     made the decision not to have this distributed at     11:01:27  
5     that moment, correct?                             11:01:29

6           A No, I don't think that at all. I was --     11:01:29  
7     it was going to be distributed, and it was going     11:01:35  
8     to be distributed per the tradition of the Senate     11:01:37  
9     to distribute a lot of this information             11:01:41  
10    simultaneously to all the parties that I            11:01:42  
11    mentioned.   11:01:45

12           I just didn't know that was going -- when     11:01:45  
13    that was going to be. So I was providing the bill     11:01:48  
14    draft to them and basically saying hold off until     11:01:50  
15    we figure out when to distribute to everybody at     11:01:53  
16    the same time.                                     11:01:56

17           Q Okay. Okay.                                 11:01:56

18           MR. KLEIN: We can pull this down now.         11:02:04

19           BY MR. KLEIN:                                 11:02:08

20           Q I'm going to turn to what you've already     11:02:08  
21    -- what you've already referenced, which is the     11:02:10  
22    second substitute bill. And we can use that         11:02:12  
23    terminology if that's now easier.                    11:02:14

24           So this second substitute bill, you worked     11:02:16  
25    on that as well, correct? You worked on that map?    11:02:25

1           A   Yeah, if by second sub bill you mean the           11:02:27  
2           one that was -- ultimately ended up being adopted           11:02:30  
3           after it was amended into Senate Bill 258; is           11:02:33  
4           that --           11:02:35

5           Q   Right.           11:02:36

6           A   -- what you're referring?           11:02:36

7           Q   Right.           11:02:37

8           A   Make sure we are on the same page.   The           11:02:38  
9           second sub bill, yes, I worked on that.           11:02:39

10          Q   Right.   Okay.   And so was this plan based           11:02:41  
11          on the first sub bill that was introduced, or did           11:02:44  
12          you more or less start from scratch?           11:02:51

13          A   Well, it's -- you know, think of all the           11:02:52  
14          things that had happened since the -- not only           11:02:56  
15          before the first Senate bill of -- the first sub           11:02:59  
16          bill of Senate Bill 258 was introduced, but there           11:03:02  
17          was also a proposal in legislative form from the           11:03:05  
18          Senate Democrats that had been amended and           11:03:07  
19          refined.   There was a proposal from the House           11:03:10  
20          Democrats that had been introduced and was before           11:03:12  
21          the legislature.   There was a map that was           11:03:16  
22          produced by the House Republicans, which you           11:03:19  
23          alluded to earlier.           11:03:23

24          There was a tremendous amount of public           11:03:24  
25          testimony that had happened in these weeks that           11:03:27

1 we're talking about, public testimony before 11:03:29  
2 Senate standing committees, House standing 11:03:31  
3 committees, joint -- joint committees. Editorials 11:03:33  
4 were writing all kinds of editorials about what 11:03:39  
5 they thought the district should look like. And 11:03:42  
6 citizens of the state were, you know, talking 11:03:45  
7 about what they wanted to the map to look like. 11:03:46

8 And so the map that was ultimately adopted 11:03:48  
9 is the attempt to have, you know, all of -- a lot 11:03:50  
10 of that feedback and all of that feedback put into 11:03:54  
11 one map. 11:03:57

12 Q Okay. And when did you start work on the 11:03:57  
13 second substitute bill map? 11:04:00

14 A Well, I don't know if I could put a 11:04:02  
15 timeline on that. I mean, as -- as we've talked 11:04:07  
16 about, I started working on stuff in mid-October, 11:04:09  
17 but then everything was really put on hold to work 11:04:14  
18 on Senate Bill 258 with Senator McColley. And 11:04:16  
19 then once that bill had been introduced and all 11:04:20  
20 the other hearings were happening, sometime in 11:04:22  
21 early November, we were trying to take all of 11:04:26  
22 these other proposals and feedbacks that we were 11:04:29  
23 getting, that you and I just talked about, into 11:04:34  
24 one map. 11:04:37

25 So that would have happened sometime in 11:04:38

1 early November. 11:04:40

2 Q Okay. So did you start work on this draft 11:04:40

3 after this first draft map was introduced? 11:04:43

4 A Well, that's why it's hard to say this 11:04:48

5 specific draft of this specific map because it's 11:04:51

6 such a collection of all of these different pieces 11:04:54

7 of other maps and public testimony and other 11:04:57

8 things that, you know, we're incorporating into 11:05:00

9 here. 11:05:03

10 And each one of those things has their own 11:05:03

11 distinct timeline. So I -- it's hard to say that 11:05:06

12 there was, like, a day that this map started to be 11:05:09

13 worked on. I can't -- I can't give that. It's a 11:05:13

14 collection of all these other -- other proposals 11:05:15

15 and feedbacks. 11:05:17

16 Q Right. So is it possible that you had 11:05:18

17 started work on this map before that first 11:05:28

18 substitute bill was introduced? 11:05:30

19 A Well, clearly there are some things -- and 11:05:32

20 we can certainly go through them -- that happened 11:05:37

21 through the public testimony process where 11:05:40

22 districts as drawn by the Senate Democrat and/or 11:05:43

23 House Democrat proposals that happened after I 11:05:47

24 started working on getting organized in 11:05:49

25 mid-October. 11:05:52

1           So clearly the answer would be it -- with 11:05:53  
2           regards to those, no, that didn't happen until 11:05:57  
3           obviously those were made public. 11:05:59

4           Yeah, a number of other things, editorials 11:06:02  
5           from local newspapers, other community leaders 11:06:07  
6           were sending letters to the presidents that I saw 11:06:11  
7           asking for districts to be changed. 11:06:14

8           So all of this is all happening 11:06:15  
9           simultaneously, but it was really -- you know, 11:06:17  
10          late October, early November is when all that 11:06:21  
11          stuff was really -- really happening leading up to 11:06:24  
12          the enactment of 258 in mid-November. 11:06:27

13          Q Right. But the actual Maptitude file that 11:06:31  
14          contained this second draft map, did you create it 11:06:37  
15          after this first draft bill was introduced? 11:06:44

16          A That -- yeah, that file that became Senate 11:06:47  
17          Bill 258 probably was the -- one of the drafts of 11:06:54  
18          where the Senator McColley Senate Bill 258 ended. 11:06:57  
19          And I probably copied that and then started 11:07:02  
20          putting all this stuff together. 11:07:05

21          So the exact date that that file was 11:07:08  
22          created is -- I have no idea. 11:07:11

23          Q All right. Do you have any reason to 11:07:12  
24          believe you did not start this file prior to the 11:07:19  
25          first draft map's introduction? 11:07:24

1           A Again, I mean, you're asking about 11:07:26  
2 starting the file and, you know, in my mind that's 11:07:28  
3 very different than the actual substance of the 11:07:32  
4 proposal that was enacted. 11:07:34

5           I know there were changes that were being 11:07:36  
6 made to this map as late as November 13th or 14th. 11:07:38  
7 I'm trying to -- you know, we had a very stringent 11:07:45  
8 process of going through and trying to make sure 11:07:48  
9 that we were minimizing splits to jurisdictions. 11:07:50

10           So the map was changing, you know, almost 11:07:54  
11 until the very last minute. So, you know, those 11:07:56  
12 things certainly didn't happen before Senate Bill 11:08:02  
13 258 was introduced; they happened well at the end 11:08:06  
14 of the process. 11:08:08

15           I'm trying to answer your question. I 11:08:11  
16 hope I have. 11:08:13

17           Q Right. I'm just trying to -- trying to 11:08:14  
18 get a sense of whether a file was created prior to 11:08:17  
19 November 3rd -- or prior to the introduction of 11:08:24  
20 the draft map. 11:08:26

21           A Well, I -- as we spoke before, I created a 11:08:27  
22 file before I was tasked to work with Senator 11:08:30  
23 McColley, but I -- I can't remember if -- I think 11:08:35  
24 I used Senate Bill 258 as Senator McColley last 11:08:39  
25 amended it as the basis technically of the file. 11:08:47

1           But, again, that's a very technical of,           11:08:52  
2     like, "the file." It's a --           11:08:53  
3           Q Right. It was --           11:08:53  
4           A -- the substance of it that's important           11:08:54  
5     was coming from all of these other sources and all           11:08:56  
6     of these other things throughout this timeline.           11:09:00  
7           Q So were there two separate files between           11:09:02  
8     that first and second draft?           11:09:07  
9           A Help me -- so you're talking about Senate           11:09:10  
10    Bill 258?           11:09:19  
11          Q Mm-hm.           11:09:19  
12          A And what -- and when you say "first and           11:09:20  
13    second draft," let's make sure --           11:09:22  
14          Q First --           11:09:24  
15          A -- I don't make the same mistakes I did --           11:09:24  
16          Q Right.           11:09:26  
17          A -- before.           11:09:26  
18           What you were referring to?           11:09:28  
19          Q Right. So the first draft that became the           11:09:30  
20    first substitute bill for Senate Bill 258           11:09:30  
21    introduced in early November, right? And then the           11:09:32  
22    second draft being the draft map introduced later           11:09:34  
23    on that was ultimately adopted.           11:09:39  
24          A Okay. Yeah, I -- my guess -- are you --           11:09:41  
25    so the question is -- now I understand. Now,           11:09:44

1 what's the question? 11:09:47

2 Q Right. So were there two separate files 11:09:48

3 as between those two drafts? 11:09:50

4 A Yes, I think there were two separate 11:09:52

5 files, right. Senate Bill 258 as Senator McColley 11:09:55

6 wanted it is a file, and then the enacted map is a 11:10:00

7 separate file. 11:10:03

8 Q Right. And then -- yeah. So now that we 11:10:03

9 understood -- right? -- it's this separate file. 11:10:08

10 That second file, first, was that created later in 11:10:10

11 time than the file for the first draft of the map? 11:10:16

12 A Yeah, I understand your question. I don't 11:10:18

13 know. I mean, I don't know if I copied the final 11:10:20

14 Senator McColley 258 and then used that as the 11:10:24

15 file or if I used something else or I started with 11:10:29

16 blank and started to put all these pieces 11:10:31

17 together. I don't recall. 11:10:34

18 Q Right. But had you made any -- strike 11:10:35

19 that. 11:10:35

20 But in terms of the subjective work on the 11:10:52

21 second draft, is it your testimony that that all 11:10:54

22 took place after this first draft of the map was 11:10:56

23 introduced? 11:11:03

24 A I don't know if I would say all of it. 11:11:03

25 I -- obviously there was a -- I'm happy to go 11:11:07

1 through them. There were a lot of things from 11:11:10  
2 public testimony and other maps that were before 11:11:14  
3 the General Assembly that were taken and put into 11:11:16  
4 the final enacted Senate Bill 258. 11:11:19

5 But I wouldn't sit here and say everything 11:11:23  
6 from it happened post the introduction of Senate 11:11:25  
7 Bill 258. 11:11:28

8 Q Okay. Right. So there was some 11:11:28  
9 substantive work that happened for this second 11:11:34  
10 draft prior to the introduction of that first 11:11:37  
11 draft? 11:11:39

12 A I'm saying -- I'm saying there could 11:11:39  
13 have -- there could have been, yeah. I'm -- yeah, 11:11:41  
14 I'm saying there could have been. 11:11:44

15 Q There could have been. Okay. Okay. 11:11:45

16 A But as you know, when you change one 11:11:52  
17 district and they're all balanced to the person, 11:11:54  
18 it's like throwing a rock in the middle of the 11:11:56  
19 pond and, you know, you get these ripple effects 11:11:58  
20 and you have to change a lot when you make one 11:12:01  
21 change -- 11:12:04

22 Q Okay. 11:12:04

23 A -- and so it's prob- -- I think it would 11:12:04  
24 be fair to say every district changed in some way 11:12:07  
25 probably several times through this process. 11:12:10

1 Q Right. Did anyone else work with you in 11:12:13  
2 drawing this second draft map besides Senator 11:12:19  
3 McColley? 11:12:23  
4 A President Huffman. I had a few 11:12:23  
5 conversations with President Huffman about the -- 11:12:31  
6 the final map as it was being put together. 11:12:33  
7 Q Is there anybody else? 11:12:37  
8 A Let me think for a minute and go through 11:12:41  
9 that. 11:12:44  
10 So at what level are you -- when you say 11:12:55  
11 "work with," what -- can you expound on that a 11:12:58  
12 little bit to help me understand? 11:13:02  
13 Q Right. Let's say -- let's -- well, we'll 11:13:03  
14 sort of start at -- we'll start with did you have 11:13:12  
15 conversations with anyone besides Senators 11:13:18  
16 McColley and Senate President Huffman about the -- 11:13:21  
17 about this revised plan? 11:13:24  
18 A Yes. 11:13:26  
19 Q Yeah. And also just to be clear, we're 11:13:33  
20 talking about a time period prior to when it was 11:13:35  
21 actually enacted. 11:13:38  
22 Okay. So who did you have conversations 11:13:39  
23 with during that time period? 11:13:41  
24 A So conversations about post -- let me just 11:13:42  
25 make sure I understand before I give you an 11:13:51

1 answer. 11:13:53

2 Q Mm-hm. 11:13:53

3 A Post the introduction of Senate Bill 258. 11:13:54

4 Q Mm-hm. 11:13:57

5 A Before obviously the enacted map was 11:13:57

6 enacted. 11:14:00

7 Q Yeah, well, let's say -- because, you 11:14:01

8 know -- because we're not certain when work on the 11:14:04

9 second draft started, let's say between late 11:14:06

10 October and when the map was voted up by the 11:14:09

11 General Assembly -- right? -- who did you have 11:14:13

12 conversations with regarding this second draft 11:14:17

13 map? 11:14:20

14 A Now "conversations with," I mean, that's 11:14:20

15 very broad. Are you intentionally -- I mean, 11:14:29

16 anybody I talk to about anything about the map, 11:14:32

17 including the logistics and all that stuff, or are 11:14:34

18 you talking about the substance of what it was 11:14:37

19 going to look like, what concepts we were going to 11:14:38

20 borrow from the Senate Democrat and put into this. 11:14:41

21 Help me understand. 11:14:45

22 Q Well, let's -- why don't we talk about 11:14:46

23 substance first. Who did you have substantive 11:14:48

24 conversations with regarding this second draft map 11:14:51

25 between -- in the time between late October and 11:14:53

1	when the plan was voted up by the General	11:15:03
2	Assembly?	11:15:06
3	A Senator Huffman -- President Huffman and	11:15:06
4	Senator McColley would be the --	11:15:10
5	Q Okay.	11:15:12
6	A -- two that would fit that substantive	11:15:12
7	conversations.	11:15:14
8	Q Did you speak to anybody else?	11:15:14
9	A Speak to anybody else? The	11:15:16
10	same substantive --	11:15:22
11	Q Sorry. Yeah, right.	11:15:23
12	A -- qualifiers?	11:15:24
13	Q Did you -- yeah, did you speak to anyone	11:15:25
14	else about the substance of the plan?	11:15:26
15	A Well, before the -- before the map was	11:15:27
16	passed by the Senate, there were conversations	11:15:33
17	about the map with the Speaker. One meeting that	11:15:38
18	I can recall with the Speaker.	11:15:43
19	Q Okay. And when was that meeting?	11:15:45
20	A I think it was November 9th.	11:15:47
21	Q Okay. Did you ever speak to John Morgan	11:15:54
22	about the second draft plan?	11:15:59
23	MR. McGUIRE: Objection. We're going to	11:16:04
24	assert the legislative privilege.	11:16:05
25	BY MR. KLEIN:	11:16:05

1 Q All right. So this is, once again, asking 11:16:07  
2 not about the substance of the conversation -- or 11:16:11  
3 I guess, you know, we'll -- okay. We'll take out 11:16:13  
4 the substantive qualifier, all right. We're not 11:16:17  
5 asking about the substance; simply the who. 11:16:19

6 Did you have any discussions with John 11:16:22  
7 Morgan regarding -- regarding this second draft 11:16:25  
8 plan? 11:16:31

9 MR. MCGUIRE: We're going to raise the 11:16:32  
10 legislative objection -- legislative privilege 11:16:34  
11 objection as the identity of folks outside of the 11:16:38  
12 General Assembly with whom conversations were had 11:16:41  
13 would reflect the deliberative and communicative 11:16:43  
14 processes of the General Assembly. 11:16:46

15 Don't answer that, please. 11:16:51

16 BY MR. KLEIN: 11:17:02

17 Q We may circle back to this in a bit, but 11:17:03  
18 we'll move on. 11:17:07

19 Any -- so anyone else you had substantive 11:17:07  
20 conversations with regarding the map -- regarding 11:17:11  
21 the second draft map? 11:17:13

22 A So, again, not to try to qualify every 11:17:15  
23 word you're saying, but I'm trying to be 11:17:18  
24 responsive to your question. Substantive 11:17:20  
25 conversations, I mean, help -- help me understand 11:17:22

1 what that means. Because the people who I spoke 11:17:24  
2 to that had the potential to change the boundaries 11:17:26  
3 we've talked about. 11:17:31  
4 Q Okay. Okay. 11:17:33  
5 A I -- if -- you know, logistics, timelines, 11:17:35  
6 things like that. If you want to go through 11:17:42  
7 those, happy to do it. 11:17:44  
8 Q Okay. 11:17:46  
9 A But in my mind, I wouldn't call those 11:17:46  
10 substantive. They may be about a substantive 11:17:49  
11 issue of the bill, but they weren't substantive. 11:17:51  
12 So -- 11:17:54  
13 Q Well -- 11:17:54  
14 A -- I hope you understand this. 11:17:55  
15 Q Right. No, I'm -- understood. Yeah, 11:17:56  
16 I'm -- I'm talking specifically about, you know, 11:17:57  
17 where district lines might be drawn, the impacts 11:18:00  
18 of drawing those lines those ways, whether it 11:18:04  
19 comes to population or any other redistrict 11:18:07  
20 considerations. 11:18:11  
21 A So I don't want to run afoul of anything, 11:18:11  
22 but I -- Blake -- at the end, Blake Springhetti 11:18:13  
23 would fall under that category. 11:18:18  
24 Q Okay. So you did speak to Blake 11:18:20  
25 Springhetti regarding this second draft plan, 11:18:23

1 correct? 11:18:25

2 A At the end -- near the end of the process, 11:18:25

3 yes. 11:18:30

4 Q Okay. And did he play any role in 11:18:30

5 creating this plan? 11:18:34

6 A I mean, "play any role"? The -- I would 11:18:36

7 say -- I would say no. 11:18:46

8 Q Okay. Did he ever give any input on the 11:18:51

9 draft map? 11:18:54

10 A Well, as I -- as I mentioned -- yes, input 11:18:55

11 and commentary at the meeting that I referenced to 11:19:01

12 you on November 9th, yes. 11:19:04

13 Q Okay. 11:19:06

14 A But as I have mentioned to you before, 11:19:07

15 there was a lot of time and effort that we wanted 11:19:09

16 to put into -- once we were, you know, working 11:19:14

17 together -- because he was working on his map with 11:19:20

18 Representative Oelslager, and I was working on the 11:19:24

19 Senate map with Senator McColley. 11:19:26

20 Once the leaders had decided on the 11:19:28

21 decisions of the map, we took great care and great 11:19:31

22 process to go through the map at a very fine level 11:19:39

23 to make sure we weren't inadvertently splitting a 11:19:43

24 township or a city that we didn't intend to do. 11:19:47

25 And through that process that Blake was 11:19:51

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1 intimately involved in, we were able to find 11:19:53  
2 several areas where we had unintended splits that 11:19:57  
3 we were able to undo, and that's why I feel that 11:20:01  
4 the map that we put forward that splits, you know, 11:20:04  
5 only 13 subdivisions a total of 14 times was so 11:20:07  
6 much better at that level than any of the other 11:20:11  
7 maps that were put forward. 11:20:14

8 And I hope we get to talk about that 11:20:16  
9 because that was very important, to make sure that 11:20:18  
10 we got down to that level, and so Blake would have 11:20:20  
11 been involved in that. 11:20:22

12 So that technically did change the 11:20:23  
13 boundaries, but it was much more along the lines 11:20:25  
14 of, hey, we accidentally split two precincts here 11:20:29  
15 in this township, let's just try to split one and 11:20:32  
16 let's fix that. 11:20:36

17 MR. KLEIN: All right. Got you. So why 11:20:38  
18 don't we go off the record. I think now might be 11:20:39  
19 an appropriate time for a lunch break. I'm 11:20:47  
20 thinking 30 minutes, if that's okay for folks? 11:20:49

21 MR. McGUIRE: Spencer, that's fine, but 11:20:51  
22 let me just -- and, again, let's go off the 11:20:54  
23 record. I'm sorry. 11:20:57

24 THE VIDEOGRAPHER: The time is -- 11:20:57

25 MR. McGUIRE: We're fine with taking a 11:21:02

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1	lunch break.	11:21:03
2	THE VIDEOGRAPHER: The time is 11:20. We	11:21:04
3	are going off the record.	11:21:07
4	(WHEREUPON, a recess was had.)	11:21:09
5	THE VIDEOGRAPHER: The time is 11:59. We	11:59:00
6	are on the record.	11:59:07
7	MR. McGUIRE: If I could just interject	11:59:11
8	before the questioning continues very briefly.	11:59:14
9	During the break, after further discussion and	11:59:16
10	consideration, we would -- we are going to	11:59:19
11	withdraw our objection to the question posed to	11:59:21
12	Mr. DiRossi "Did you speak with John Morgan in	11:59:26
13	the" -- whatever -- "in the process of the map	11:59:33
14	making?" But we are going to object to it on the	11:59:36
15	grounds of attorney-client privilege and work	11:59:40
16	product.	11:59:43
17	Mr. Morgan was retained by outside counsel	11:59:43
18	for the Speaker and the President, and it is our	11:59:47
19	position that who the outside counsel choose to	11:59:52
20	have any of its witnesses and/or clients, in this	11:59:57
21	case, speak with, a nontestifying consultant -- a	12:00:00
22	person in a nontestifying consultant position,	12:00:07
23	that that reflects the mental impressions of the	12:00:10
24	attorneys and the outside counsel and that that is	12:00:13
25	work product, and we're going to instruct him not	12:00:15

1 to answer on that basis. 12:00:17

2 I just wanted to clarify that. 12:00:19

3 MR. KLEIN: Okay. Thank you. 12:00:21

4 BY MR. KLEIN: 12:00:22

5 Q So what I -- so then let me rephrase the 12:00:23

6 question slightly. I'm not asking you about any 12:00:29

7 conversations you've had related to this 12:00:33

8 litigation. I am simply asking about any 12:00:35

9 conversations about the map that was ultimately 12:00:38

10 enacted or the original draft presented to the 12:00:43

11 General Assembly. 12:00:47

12 With that caveat, did you have any 12:00:48

13 conversations with John Morgan concerning 12:00:51

14 congressional redistricting in Ohio? 12:00:56

15 MR. McGUIRE: We're going to object on the 12:01:00

16 basis of attorney-client privilege and attorney 12:01:02

17 work product and the -- it was well anticipated by 12:01:04

18 the Speaker and the President, given the public 12:01:07

19 statements of various groups and simply the way 12:01:11

20 this -- everyone inevitably knew this would play 12:01:14

21 out that at the time Mr. Morgan was retained, 12:01:19

22 there was an anticipation of litigation involving 12:01:23

23 the redistricting congressional map. 12:01:26

24 And, again, who -- who outside counsel 12:01:29

25 chose to have their witnesses speak to, which 12:01:32

1	nontestifying consultants or experts, reflects the	12:01:34
2	mental impressions of counsel and is work product	12:01:37
3	privilege.	12:01:41
4	So we're going to -- do not answer that	12:01:42
5	question.	12:01:44
6	THE WITNESS: All right.	12:01:44
7	MR. KLEIN: Just for the record, I'm going	12:01:45
8	to -- I'm going to note that we dispute that	12:01:46
9	objection. We do not believe work product or	12:01:54
10	attorney-client is so capacious as to include	12:01:57
11	those matters, but we're noting that for the	12:02:01
12	record and we're moving on.	12:02:03
13	BY MR. KLEIN:	12:02:05
14	Q And so, Mr. DiRossi, coming back, I think	12:02:06
15	we covered this to some extent, but just to recap,	12:02:11
16	who did you report to when you were working on	12:02:15
17	congressional maps for this cycle?	12:02:17
18	A Well, I am a staff person, so I am always	12:02:20
19	reportable to the President, the Senate, and the	12:02:27
20	Chief of Staff. When I was working with Senator	12:02:30
21	McColley, I was -- it was his bill. I was	12:02:32
22	reporting directly to him.	12:02:35
23	Q Okay. So is it fair to say that Senator	12:02:36
24	McColley was supervising your work on	12:02:40
25	congressional maps this cycle?	12:02:42

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1           A I don't know if there -- that has -- 12:02:43  
2           supervising has some type of significance to it. 12:02:47  
3           I was reporting to him. That's the best I can 12:02:50  
4           tell you. 12:02:52  
5           Q Okay. So if you were to report to someone 12:02:52  
6           on the progress of your work on the maps, would it 12:02:54  
7           be Senator McColley? 12:02:57  
8           A Yes. 12:03:02  
9           Q And how did you report the progress of 12:03:05  
10          your work on draft congressional maps to Senator 12:03:07  
11          McColley? 12:03:13  
12          A Well -- and, again, the progress of my 12:03:13  
13          work was implementing his directions. So, you 12:03:16  
14          know, it -- he was the one -- his bill -- Senate 12:03:20  
15          Bill 258 has his name on it. He's telling me what 12:03:25  
16          counties -- you know, I'm just helping him with 12:03:28  
17          the technical aspects and helping make sure the 12:03:30  
18          districts are balanced out. 12:03:33  
19          MR. MCGUIRE: I think the question from 12:03:34  
20          Mr. Klein was how, by what methods were you 12:03:36  
21          communicating with -- I think, with Mr. -- with 12:03:38  
22          Senator McColley about the progress of the maps, 12:03:42  
23          email, conversations, texts, et cetera. I think 12:03:44  
24          that was the question. 12:03:47  
25          MR. KLEIN: Yeah, that is. 12:03:48

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	BY MR. KLEIN:	12:03:49
2	Q So we can kind of run through. So did you	12:03:49
3	send Senator McColley written reports of some sort	12:03:52
4	on -- on how work was going on the congressional	12:03:57
5	maps?	12:04:04
6	A No.	12:04:04
7	Q Did you send him emails?	12:04:04
8	A None that I can recall. I don't believe	12:04:10
9	so.	12:04:12
10	Q Okay. Texts?	12:04:12
11	A I -- you know, as we discussed earlier, I	12:04:13
12	would have sent him text messages about logistics,	12:04:16
13	like if you're available for a phone call later	12:04:19
14	and so forth, and that would be the --	12:04:22
15	Q Okay.	12:04:27
16	A -- extent of that.	12:04:28
17	Q Yeah. So based on that, I have a sense	12:04:29
18	that you gave him reports of how progress was	12:04:31
19	going over the phone?	12:04:33
20	A In person. I mean, I met with him in his	12:04:34
21	office, as we discussed numerous times.	12:04:37
22	Q Right. And so was that always the way	12:04:40
23	that you reported on progress of the congressional	12:04:42
24	maps?	12:04:45
25	A Well, phone -- phone and in person.	12:04:45

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1 Q Okay. Did he ever visit your office to 12:04:55  
2 see how congressional maps were coming along? 12:04:57  
3 A Which office are you referring to? Sorry. 12:04:59  
4 Q Right. So the -- so I am referring to the 12:05:05  
5 office that you referenced earlier where you had a 12:05:07  
6 computer that had Maptitude loaded up. 12:05:10  
7 A No. 12:05:17  
8 Q Okay. So he never visited you there. So 12:05:17  
9 did McColley ever have a chance to look at your 12:05:22  
10 Maptitude screen? 12:05:25  
11 A No. 12:05:26  
12 Q Okay. So did you ever get a chance to 12:05:26  
13 present a draft map to Senator McColley before it 12:05:37  
14 was introduced? 12:05:40  
15 A Well, again, what is -- present -- present 12:05:48  
16 a draft map? I mean, I was implementing his 12:05:50  
17 direction. So obviously -- 12:05:53  
18 Q Okay. 12:05:53  
19 A -- he saw it before it was introduced 12:05:55  
20 under his name. 12:05:57  
21 Q Okay. So how did he see it? How did you 12:05:58  
22 show him the map? 12:06:02  
23 A I would have showed him a physical printed 12:06:03  
24 copy of the map. 12:06:07  
25 Q Okay. And what did -- and what did that 12:06:07

1 printed copy look like? 12:06:14

2 A I mean, it was -- well, it's very similar 12:06:16

3 to the 8-and-a-half-by-11 copies that we have now, 12:06:23

4 although I think it might have been larger. Just 12:06:26

5 it was a graphical representation of the districts 12:06:30

6 as his direction was dictating. 12:06:32

7 Q Okay. So this graphical representation, 12:06:36

8 did it show where district lines were? 12:06:41

9 A Well, as all of the maps that have been 12:06:49

10 produced, the districts are different colors. 12:06:51

11 Q Right. 12:06:54

12 A So -- 12:06:55

13 Q Okay. 12:06:56

14 A -- I mean, that would show where a 12:06:56

15 district line would be. 12:06:59

16 Q And -- 12:07:02

17 A A district border. A district border. 12:07:03

18 Q Yeah. Did it show any data beyond the map 12:07:05

19 that was publicly released with the bill, which I 12:07:08

20 believe you -- I believe you have in front of you, 12:07:12

21 correct? 12:07:14

22 A If you're referring to Senate Bill 258 as 12:07:14

23 Senator McColley -- 12:07:19

24 Q Mm-hm. 12:07:22

25 A -- directed it, I do not have that in 12:07:22

1 front of me. 12:07:26

2 Q Okay. But in terms of the data that is -- 12:07:27

3 so just in terms of the data that is on it from 12:07:30

4 where -- you know, what sort of lines are actually 12:07:33

5 visible, is it anything beyond just a map of Ohio 12:07:35

6 and basic district lines with numbers 12:07:38

7 superimposed? 12:07:42

8 A No, that's it. You nailed it. And the 12:07:43

9 numbers superimposed are the district numbers -- 12:07:47

10 Q Right. Okay. 12:07:49

11 A -- yeah. 12:07:51

12 Q All right. And you said that you received 12:07:52

13 instructions from Senator McColley; is that right? 12:07:58

14 A Yes. 12:08:00

15 Q All right. Did Senator McColley instruct 12:08:02

16 you to create maps that were in compliance with 12:08:05

17 Article 19 of the Ohio constitution? 12:08:10

18 A Yes, he wanted -- he definitely wanted to 12:08:17

19 make sure that we followed any provisions of the 12:08:19

20 constitution. 12:08:23

21 Q Okay. Were you instructed to draw compact 12:08:23

22 districts? 12:08:29

23 MR. McGUIRE: I'm going to object on the 12:08:34

24 basis of legislative privilege to specific 12:08:34

25 instructions given by Senator McColley or any 12:08:37

1 other member of the General Assembly to 12:08:39  
2 Mr. DiRossi regarding how to -- what to draw into 12:08:41  
3 the maps. 12:08:44  
4 MR. KLEIN: Okay. I will note our dispute 12:08:46  
5 of that objection. 12:08:49  
6 I'll also note that this portion is 12:09:00  
7 incomplete since we've asked the one question of 12:09:02  
8 whether it complied with the constitution but have 12:09:04  
9 not discussed any further instructions and, 12:09:06  
10 therefore, we have an incomplete picture of what 12:09:08  
11 instructions Mr. DiRossi was actually given. But 12:09:11  
12 noting that objection and disputing it, we'll move 12:09:14  
13 on. 12:09:16  
14 BY MR. KLEIN: 12:09:17  
15 Q Did Senator McColley give you a deadline 12:09:23  
16 for the first drafts of the map? 12:09:25  
17 A Good question. Not -- not I can recall. 12:09:28  
18 I don't -- I don't remember -- I don't -- I can't 12:09:40  
19 recall that. 12:09:43  
20 Q Okay. And you said -- strike that. 12:09:43  
21 I believe it was your testimony that you 12:09:52  
22 sent a draft map over to Senator McColley sometime 12:09:53  
23 in late October/early November, correct? 12:09:58  
24 A Yeah, I'm not -- yeah. Well, October 25th 12:10:00  
25 or 26th is when I was directed to work with him. 12:10:07

1 So sometime after that. 12:10:11

2 Q Okay. And so why did you send the map 12:10:14

3 over to him when you did; was it just a matter of 12:10:21

4 whenever you could get it done, you sent it? 12:10:24

5 A Well, I -- I mean, I'm not -- I wasn't -- 12:10:26

6 I knew that things were somewhat time-sensitive. 12:10:29

7 And at some point, I knew that this was going to 12:10:32

8 be introduced as a bill in the Senate and undergo 12:10:35

9 hearings. 12:10:39

10 So obviously I was trying not to 12:10:39

11 dillydally. And so, you know, as -- I got the 12:10:43

12 direction to work with him. I had phone 12:10:46

13 conversations with him. I took his direction, put 12:10:48

14 it in -- put it into Maptitude, and then took to 12:10:50

15 him kind of the output to get more feedback from 12:10:54

16 him, more input. 12:10:58

17 Q Okay. Were you ever given any deadlines 12:10:59

18 related to congressional maps from Senator 12:11:01

19 McColley? 12:11:04

20 A Yeah, I appreciate that question. Again, 12:11:04

21 I -- I don't recall a deadline from him, but 12:11:07

22 obviously at some point I was aware that the 12:11:13

23 committee -- it was going to be introduced and 12:11:15

24 have committee hearings. So, you know, I knew it 12:11:18

25 would be very difficult to do that without the 12:11:21

1 finished product. 12:11:23

2 So, I mean, I guess I took that as some 12:11:24

3 deadline, but I don't recall him ever directing me 12:11:27

4 on dates. 12:11:30

5 Q Okay. Were you ever instructed to prepare 12:11:31

6 a draft map to present -- actually, strike that. 12:11:41

7 Were you ever instructed to prepare a 12:11:46

8 draft congressional map to present to the Ohio 12:11:48

9 Redistricting Commission? 12:11:52

10 A No. 12:11:52

11 Q Okay. Did you ever speak to -- strike 12:11:57

12 that. 12:11:57

13 Setting aside Senator Huffman -- or, 12:12:14

14 rather, President Huffman and Speaker Cupp, did 12:12:20

15 you ever communicate with any members of the 12:12:24

16 commission about congressional maps? 12:12:26

17 A Yes. 12:12:45

18 Q Okay. Who was that? 12:12:45

19 A Governor DeWine. 12:12:46

20 Q Okay. Do you recall when that 12:12:48

21 conversation took place? 12:12:50

22 A Did you say how or when? 12:12:51

23 Q When. 12:12:53

24 A I couldn't hear you. You garbled a 12:12:54

25 second. 12:12:57

1 Q Sorry. Do you recall when that 12:12:57  
2 conversation took place? 12:12:59  
3 A I think it was November 10th -- 10th or 12:13:00  
4 11th. 12:13:06  
5 Q Okay. And who was present for that 12:13:06  
6 conversation? 12:13:10  
7 A The President and the Speaker, the 12:13:10  
8 Governor, the -- myself, Blake from the House. 12:13:21  
9 Q Okay. 12:13:29  
10 A And the two Chiefs of Staff -- 12:13:29  
11 Q Okay. 12:13:33  
12 A -- are the people I can recall. 12:13:34  
13 Q So actually, let's -- let's actually back 12:13:35  
14 up a little to the month of October -- or 12:13:38  
15 actually, let's say -- actually, strike that. 12:13:42  
16 Let's back up to before November 1st. 12:13:44  
17 Prior to November 1st, did you have any 12:13:46  
18 discussions with any member of the Ohio 12:13:48  
19 Redistricting Commission concerning congressional 12:13:54  
20 maps, setting aside President Huffman and Speaker 12:13:55  
21 Cupp? 12:13:59  
22 A You said prior to November 1st? 12:13:59  
23 Q Correct. 12:14:02  
24 A No. 12:14:02  
25 Q Okay. So speaking generally -- actually, 12:14:07

1	strike that.	12:14:26
2	Did you ever communicate with any	12:14:26
3	Democratic members with the state Senate about	12:14:28
4	draft congressional maps this cycle?	12:14:33
5	A Did you say the members?	12:14:35
6	Q Yeah, Democratic members.	12:14:37
7	A Yeah, I did not. That -- I'm a staff	12:14:38
8	person. The members communicate with -- to each	12:14:42
9	other.	12:14:46
10	Q Okay.	12:14:47
11	A Especially the leaders.	12:14:47
12	Q All right. Did you ever speak with any	12:14:48
13	Democratic members of the state House about	12:14:52
14	congressional maps?	12:14:55
15	A About congressional maps? No, the same --	12:15:00
16	the same thing. Now -- now I'm not even in the	12:15:01
17	right chamber --	12:15:04
18	Q Right.	12:15:05
19	A -- yeah, so I did not.	12:15:06
20	Q Any -- any Democratic members of the	12:15:08
21	United States House?	12:15:11
22	A No.	12:15:15
23	Q Okay. Any Democratic members of the	12:15:22
24	United States Senate?	12:15:25
25	A No.	12:15:32

1 Q Okay. Have you attended any trainings on 12:15:32  
2 redistricting in the last ten years? 12:15:39  
3 A How I understand trainings, no. 12:15:40  
4 Q Okay. Any sort of event, either online or 12:15:52  
5 in person, where any attendee had an 12:15:54  
6 opportunity -- strike that. 12:16:04  
7 I'm asking about any sort of event, either 12:16:05  
8 online or in person, where attendees had the 12:16:07  
9 opportunity to learn about redistricting. 12:16:13  
10 Anything like that in the last ten years? 12:16:16  
11 A Mr. Klein, are you asking where I had the 12:16:17  
12 opportunity to learn or -- 12:16:21  
13 Q Well, yeah, where you would or -- 12:16:22  
14 A -- an event where -- 12:16:23  
15 (Indiscernible cross-talk.) 12:16:25  
16 BY MR. KLEIN: 12:16:27  
17 Q Yeah, so where you or any attendee would 12:16:27  
18 have the opportunity to learn about redistricting, 12:16:30  
19 anything like that in the last ten years. 12:16:32  
20 A I think years ago I attended an NCSL 12:16:43  
21 redistricting conference -- 12:16:48  
22 Q Okay. Do you -- 12:16:50  
23 A -- along with -- along with some of the 12:16:52  
24 Democratic staff from the Senate. 12:16:55  
25 Q And just for the record, what does that 12:16:57

1	stand for, NCSL?	12:16:58
2	A That's the National Conference of State	12:17:00
3	Legislatures.	12:17:03
4	Q Okay. And any other trainings aside from	12:17:04
5	that?	12:17:15
6	A No.	12:17:15
7	Q Okay. Any sort of event hosted by any	12:17:15
8	organization other than the Ohio Redistricting	12:17:21
9	Commission and the General Assembly where	12:17:24
10	redistricting was discussed?	12:17:26
11	A Were there any other things or that I	12:17:34
12	attended?	12:17:35
13	Q Yeah, that you attended, the same	12:17:35
14	question, in the last ten years.	12:17:38
15	A So put it all together for me. Say it	12:17:39
16	again, please.	12:17:43
17	Q So in the last ten years, have you	12:17:44
18	attended any events where redistricting was	12:17:46
19	discussed other than those hosted by the General	12:17:48
20	Assembly or the Ohio Redistricting Commission?	12:17:51
21	A In the last ten years, huh? None that	12:17:57
22	come to mind right now.	12:18:10
23	Q Okay. Setting aside Senator McColley,	12:18:10
24	Senate President Huffman, Speaker Cupp, did you	12:18:25
25	speak any incumbent legislators, whether state or	12:18:28

1 federal, about the map? 12:18:34

2 A About the -- about the congressional map, 12:18:35

3 about -- 12:18:38

4 Q Yes. 12:18:38

5 A -- the lines, you mean? 12:18:38

6 Q Mm-hm. 12:18:40

7 A In what time period are you talking about? 12:18:41

8 Q Right. Okay. We'll clarify. 12:18:43

9 So in the time between when you started 12:18:45

10 working on congressional maps, this cycle, and 12:18:53

11 when they were approved by the General Assembly, 12:18:55

12 when the map was approved by the General Assembly, 12:18:57

13 did you speak to any incumbent legislators about 12:18:59

14 congressional maps? 12:19:05

15 A Incumbent legislators about congressional 12:19:05

16 maps. 12:19:13

17 Q And, once again, setting aside the people 12:19:13

18 that we already discussed: Speaker Cupp and 12:19:17

19 President Huffman and Senator McColley. 12:19:20

20 A Yeah, I'm just trying to keep all the 12:19:22

21 qualifiers straight and see -- I apologize. Can 12:19:24

22 you say it -- say it again? 12:19:27

23 Q Sure. 12:19:28

24 I can actually break it down -- 12:19:29

25 A Great. 12:19:32

1 Q -- a little bit. 12:19:33

2 So setting aside President Huffman, 12:19:34

3 Speaker Cupp, and Senator McColley, after 12:19:40

4 October 1st, 2021, did you speak to any incumbent 12:19:48

5 legislators about the congressional maps? 12:19:53

6 A October 1st. Incumbent legislators, 12:19:55

7 October 1st. And when you say "about the 12:19:59

8 congressional maps," you mean -- 12:20:01

9 Q Right. 12:20:03

10 A -- the substantive -- 12:20:03

11 Q Let's -- let's just say congressional 12:20:05

12 redistricting generally. 12:20:09

13 A Well, there was obviously legislators who 12:20:10

14 were involved in the committee process. So there 12:20:13

15 would have been conversations with them about the 12:20:19

16 logistics of producing documents for distribution. 12:20:21

17 We kind of touched on that a little earlier in the 12:20:24

18 Senate committee. I don't -- so I guess I would 12:20:30

19 say them. 12:20:33

20 I -- I'm trying to recall specifically 12:20:43

21 conversations or -- I'm not just guessing. 12:20:50

22 Q Maybe I can clarify just a little bit 12:20:55

23 more. 12:20:57

24 A Sure. Thank you. 12:20:57

25 Q Did you speak -- so following October 1st, 12:20:58

1 did you speak to any members of the U.S. Congress 12:21:01  
2 about congressional redistricting? 12:21:05  
3 A About the -- how lines were going to look? 12:21:08  
4 No. 12:21:13  
5 Q Did you discuss about -- did you have any 12:21:13  
6 discussions with any members of Congress about 12:21:18  
7 congressional redistricting generally? 12:21:20  
8 A A couple inquired about the timelines for 12:21:22  
9 the process. 12:21:26  
10 MR. MCGUIRE: Now, his question was 12:21:27  
11 members of the Congress. That would mean the 12:21:29  
12 United States -- 12:21:31  
13 THE WITNESS: Yes. 12:21:31  
14 MR. MCGUIRE: -- about the General 12:21:32  
15 Assembly. Several of them inquired -- 12:21:35  
16 THE WITNESS: He changed -- 12:21:36  
17 MR. MCGUIRE: -- (indiscernible) -- 12:21:39  
18 THE WITNESS: -- legislators and I 12:21:39  
19 thought -- I took "legislators" to mean state 12:21:40  
20 legislators, but then you changed to -- 12:21:40  
21 BY MR. KLEIN: 12:21:40  
22 Q Oh, yeah, right. Right. That was -- 12:21:40  
23 (Indiscernible cross-talk.) 12:21:42  
24 BY MR. KLEIN: 12:21:47  
25 Q -- to sort of narrow it down a little bit 12:21:48

1 to make the question a little bit more -- 12:21:50

2 A Yes. 12:21:51

3 Q -- you know, manageable. 12:21:52

4 A There were some inquiries from members of 12:21:54

5 the Congress about the process and the timelines 12:21:57

6 for it because nobody had been through it before. 12:21:59

7 Q Right. But other than that, no discussion 12:22:02

8 with members of Congress regarding congressional 12:22:04

9 redistricting -- 12:22:07

10 A Nothing about the substance, yeah. 12:22:07

11 Q Okay. Okay. 12:22:09

12 MR. KLEIN: Let's see. Now, let's pull up 12:22:24

13 Tab 14. I'd like to mark this as an exhibit. 12:22:25

14 (WHEREUPON, DiRossi Exhibit No. 4 was 12:22:31

15 presented to the witness.) 12:22:47

16 BY MR. KLEIN: 12:22:47

17 Q I'm going to represent to you that your 12:22:50

18 counsel produced this to us. 12:22:53

19 Have you seen this email before? 12:22:57

20 A I don't recall it, but it appears to be 12:22:58

21 from me. 12:23:12

22 Q Yeah. And it looks like you're sending 12:23:14

23 this email, correct? 12:23:16

24 A Yeah, it -- yes. 12:23:16

25 Q Okay. 12:23:20

1 A It says from Ray DiRossi. 12:23:21  
2 Q Right. 12:23:24  
3 MR. KLEIN: So can we pull up Tab 14. 12:23:25  
4 THE TECHNICIAN: This was Tab 14. 12:23:32  
5 MR. KLEIN: Sorry. Right. I meant to say 12:23:46  
6 Tab 15. Apologies. And I'd also like to mark 12:23:48  
7 that as an exhibit. 12:23:54  
8 (WHEREUPON, DiRossi Exhibit No. 5 was 12:23:54  
9 presented to the witness.) 12:24:08  
10 BY MR. KLEIN: 12:24:08  
11 Q So I'm going to represent to you that this 12:24:08  
12 was produced to us as well. It has -- do you 12:24:10  
13 recognize this document? 12:24:18  
14 A Yeah, can you scroll through the whole 12:24:26  
15 document for me? 12:24:28  
16 Q Of course, yeah. 12:24:29  
17 A It looks like it's ten pages or something. 12:24:30  
18 Q Yeah. 12:24:33  
19 A Or nine pages. 12:24:33  
20 Thank you. 12:25:28  
21 Q So do you recognize this document? 12:25:28  
22 A Yeah, I do now. 12:25:30  
23 Q Okay. Do you know who prepared this 12:25:32  
24 document? 12:25:34  
25 A It would have been me. 12:25:34

1 Q It would have been you. Okay. 12:25:37

2 And did you send this over to Senator 12:25:39

3 McColley? 12:25:45

4 A You know, I don't recall doing it, but if 12:25:45

5 the previous thing you showed me is the email and 12:25:48

6 this is one of the attachments -- 12:25:51

7 Q All right. 12:25:54

8 A -- then I would have, but I don't recall 12:25:54

9 doing that. 12:25:56

10 Q Yeah, so this appears to be one of the 12:25:57

11 attachments. It has the next Bates number -- 12:25:59

12 we -- but it looks like your counsel has produced 12:26:07

13 it in a format where you can tie the attachments 12:26:10

14 to the email. 12:26:13

15 We can click back to that email that's 12:26:14

16 marked as Exhibit 4. Do you see the title 12:26:16

17 "Substitute Bill Items"? 12:26:19

18 Is it your understanding that that 12:26:22

19 document is what we see in Exhibit 5? 12:26:23

20 A You know, quite honestly -- I mean, I 12:26:25

21 recognize your exhibit -- or the exhibit in Number 12:26:31

22 5, but I can't say that that is what that -- it's 12:26:35

23 definitely not the graphics referenced, but it -- 12:26:39

24 I can't say for sure that it's the other one. 12:26:42

25 Q Okay. All right. So this appears to be 12:26:59

1 an analysis of several proposed congressional 12:27:00  
2 plans; is that correct? 12:27:06  
3 A I mean, it's got a lot of facts on it, 12:27:07  
4 yeah -- 12:27:09  
5 Q Right. But -- 12:27:09  
6 A -- probably a couple sources. 12:27:10  
7 Q But at least in part, we've got an 12:27:11  
8 analysis of several congressional plans, correct? 12:27:13  
9 A Yes. 12:27:16  
10 Q Okay. 12:27:21  
11 MR. KLEIN: And if we could just scroll 12:27:22  
12 down towards the bottom of Page 1. 12:27:25  
13 Scroll up just a little bit. 12:27:29  
14 BY MR. KLEIN: 12:27:30  
15 Q So where it says "McColley (SB 258)," do 12:27:31  
16 you -- does that refer to the plan that was 12:27:40  
17 ultimately enacted by the General Assembly? 12:27:46  
18 A I believe it does, yes. 12:27:53  
19 Q Okay. And what about the House Dems 12:27:55  
20 portion; do you know which proposal that refers 12:27:58  
21 to? 12:28:01  
22 A I believe it was their modified version. 12:28:05  
23 They did a -- they did a couple sub bills along 12:28:08  
24 the way as well to refine their -- their map. 12:28:11  
25 Q Okay. And Sykes/Yuko 258? 12:28:14

1           A Same. 12:28:19

2           Q Okay. And then Contest Winning map 12:28:20

3 Number 1, 3, do you know what that refers to? 12:28:23

4           A There was a -- public contests that were 12:28:26

5 put on by a number of groups that put into the 12:28:29

6 public domain -- well, they had a contest, and 12:28:32

7 these were the winning maps. I'm not sure I can 12:28:40

8 say more than that. 12:28:43

9           Q Okay. And then "Current map," does that 12:28:43

10 refer to the map in effect from 2012 through 2022? 12:28:47

11          A Yes. 12:28:51

12          Q Okay. All right. 12:28:52

13           MR. KLEIN: If we can scroll down to Bates 12:29:00

14 number 5603. I'm not sure how that corresponds to 12:29:02

15 PDF pages, but -- yeah, I think that is this one 12:29:05

16 right here. 12:29:08

17 BY MR. KLEIN: 12:29:08

18          Q So I want to walk through what we're 12:29:10

19 looking on the page here. So it looks like this 12:29:13

20 is a chart without lines. It looks like the -- 12:29:15

21 we've got a left-most column here that's numbered 12:29:21

22 1 through 15. 12:29:25

23           So those are numbers of -- so those are 12:29:26

24 numbers of -- those are numbers of districts, 12:29:29

25 correct? 12:29:31

1	A Yes.	12:29:31
2	Q And -- all right. And this and -- what	12:29:31
3	we're seeing here, does this refer to the plan	12:29:37
4	that was ultimately enacted by the General	12:29:39
5	Assembly?	12:29:43
6	A I believe it does.	12:29:43
7	Q Okay. All right. And then the second	12:29:44
8	column there, is that the total population of each	12:29:49
9	district?	12:29:53
10	A It is.	12:29:53
11	Q And then the third one, there's really	12:29:54
12	only two numbers on there, that refers to the	12:29:59
13	number of deviation from target, correct?	12:30:01
14	A Yes, the deviation column.	12:30:03
15	Q Okay. And then FED 12 to 20, is that the	12:30:05
16	index we were talking about earlier that -- that	12:30:13
17	has all the federal elections from 2012 to 2020?	12:30:18
18	A Yes.	12:30:22
19	Q Okay. And so is it your understanding	12:30:22
20	that what we're looking at here is the same as	12:30:27
21	what was loaded into Maptitude for U.S. FEDEA?	12:30:30
22	A Yes.	12:30:37
23	MR. KLEIN: So -- all right. Let's go	12:30:53
24	down -- I think it's just one page to Bates 5604.	12:30:54
25		

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1 BY MR. KLEIN: 12:30:57

2 Q So at the top it says, "Competitive CDs." 12:30:58

3 We'll walk through this by word for word. 12:31:01

4 So what does "Competitive CDs" mean? 12:31:04

5 A Competitive congressional districts. 12:31:08

6 Q Okay. And how about plus or minus 12:31:11

7 4 percent? 12:31:13

8 A It's referring to a scoring if 50/50 was 12:31:13

9 absolute, perfectly balanced, plus or minus 12:31:22

10 4 percent up or down. That's what it's referring 12:31:25

11 to. 12:31:30

12 Q Okay. Got you. And then, finally, "Using 12:31:31

13 FED Data," is that what we just discussed, this -- 12:31:34

14 this index that is all of the federal elections 12:31:43

15 from 2012 to 2020? 12:31:50

16 A Yes. 12:31:53

17 Q Okay. And so what this is saying here is, 12:31:53

18 these are indices where -- or, rather, these 12:31:58

19 are -- these are districts where there is a -- 12:32:04

20 where there is an index that is plus or minus 4, 12:32:12

21 correct? 12:32:17

22 A Yeah -- well, I think I -- I think I 12:32:17

23 followed you there, yes, it's -- 12:32:19

24 Q Right. So imagine we're looking at FEDEA 12:32:21

25 and the figure 4 at given districts was 12:32:24

1 53 percent, would that fall within this definition 12:32:29  
2 of competitiveness? 12:32:34  
3 A Yes. 12:32:35  
4 Q If it was 54 percent, it would? 12:32:36  
5 A You said 53. 12:32:40  
6 Q Oh, right. Right. Right. No, that was 12:32:42  
7 just my next questions. If it was -- 12:32:45  
8 A Sorry. 12:32:47  
9 Q -- 54 percent, it would also fall within 12:32:47  
10 that definition? 12:32:51  
11 A Yep. We'd be at the outer limit, yes. 12:32:51  
12 Q Okay. So then if it was -- 12:32:55  
13 A The same thing -- yeah. 12:32:56  
14 Q Yeah, so then if were 54.1, it wouldn't, 12:32:57  
15 correct? 12:33:01  
16 A Correct. 12:33:01  
17 Q Okay. And so -- and so the numbers listed 12:33:02  
18 underneath here on the left side are the number of 12:33:07  
19 competitive districts under each plan under this 12:33:10  
20 definition, correct? 12:33:14  
21 A Correct. 12:33:15  
22 Q Okay. And then on the right side of the 12:33:16  
23 screen, it says, "Competitive CDs (plus or minus 4 12:33:17  
24 percent) using all data." 12:33:21  
25 So this bit about competitive CDs plus or 12:33:23

1	minus 4 percent, the same meaning as we just	12:33:27
2	discussed, right?	12:33:29
3	A Yes.	12:33:30
4	Q And what -- and what is meant here by "all	12:33:30
5	data"?	12:33:34
6	A It is state and federal data.	12:33:34
7	Q Okay. State and federal data. So that	12:33:40
8	would be a partisan index that includes state and	12:33:43
9	federal elections?	12:33:45
10	A Yes.	12:33:47
11	Q And is that the partisan index that we	12:33:47
12	discussed earlier that was -- that was -- that was	12:33:55
13	called, in your data, EA53?	12:34:02
14	A Yes.	12:34:05
15	Q Okay. All right. And so it's -- what is	12:34:05
16	listed beneath here are the number of districts	12:34:13
17	that are competitive using this index under this	12:34:18
18	definition of competitiveness; is that right?	12:34:21
19	A Yes.	12:34:23
20	Q Okay. All right.	12:34:23
21	MR. KLEIN: Let's turn to the -- let's	12:34:46
22	skip along to Tab 16. And I'd like to mark that	12:34:47
23	as an exhibit as well.	12:34:55
24	(WHEREUPON, DiRossi Exhibit No. 6 was	12:34:56
25	presented to the witness.)	12:35:02

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1	MR. McGUIRE: That will be 6?	12:35:02
2	MR. KLEIN: I believe so. Yeah.	12:35:05
3	Why don't we scroll through so Mr. DiRossi	12:35:10
4	can have a chance to see what this document is.	12:35:14
5	BY THE WITNESS:	12:35:59
6	A Thank you.	12:36:00
7	BY MR. KLEIN:	12:36:00
8	Q Have you had a chance to look at it,	12:36:01
9	Mr. DiRossi?	12:36:04
10	A Yeah. I was just looking to see if there	12:36:04
11	was a date on it.	12:36:07
12	Q Oh, right. Yeah, I'm not sure there is.	12:36:07
13	But have you ever seen this document	12:36:12
14	before?	12:36:13
15	A I don't think so.	12:36:13
16	BY MR. KLEIN:	12:36:22
17	Q Okay. Well, I'm representing to you this	12:36:23
18	is -- this is Senator McColley's written testimony	12:36:26
19	to the Senate Committee on Local Government and	12:36:30
20	Elections, and it was presented at the	12:36:33
21	November 16th hearing.	12:36:35
22	A Okay.	12:36:38
23	Q So let's scroll down to -- this would be	12:36:38
24	PDF Page 2. And let's take a look at this chart.	12:36:43
25	Does this chart look familiar?	12:36:59

1 A Generally, yeah. 12:37:01

2 Q Okay. Is this the same data that we were 12:37:02

3 just looking at in the document you prepared 12:37:04

4 listing partisan indices for the districts under 12:37:09

5 the enacted plan? 12:37:14

6 A I mean, it looks like -- without going 12:37:16

7 back and comparing them to just verify they're the 12:37:18

8 same, they -- they look the same. 12:37:21

9 Q Yeah, why don't we actually click back to 12:37:23

10 that. I think we should have that. 12:37:25

11 THE TECHNICIAN: Where are you directing 12:37:40

12 me to, Counsel? I apologize. 12:37:42

13 MR. KLEIN: Yeah, so -- so, yeah, could we 12:37:44

14 just click back to Exhibit 5, DiRossi 5. And I 12:37:45

15 think we're going to be going back up to 5603. 12:37:52

16 BY MR. KLEIN: 12:38:00

17 Q So I'll give you a chance to look at that, 12:38:01

18 and we can -- of course we can click back and 12:38:03

19 forth as you want. 12:38:06

20 A Yeah. Thank you. 12:38:07

21 Okay. You can click to the other one. 12:38:17

22 Q Okay. 12:38:19

23 A I didn't verify every number, but I looked 12:38:25

24 at some of them, so -- they look the same. 12:38:29

25 Q And did Senator McColley get this data 12:38:32

1 from you? 12:38:36

2 A I'm sure he did. 12:38:37

3 Q Okay. Okay. So we already talked about 12:38:41

4 this a little bit, but if you scroll up just a 12:38:58

5 little bit -- 12:39:02

6 MR. KLEIN: If you can do that, Ethan. 12:39:03

7 Thanks. 12:39:05

8 BY MR. KLEIN: 12:39:05

9 Q If you could take a moment just to read 12:39:06

10 this paragraph here. Really just the -- just the 12:39:08

11 last two sentences of this paragraph here. It 12:39:14

12 looks like, as we've discussed, there is a 12:39:18

13 definition of competitive district that is ranging 12:39:20

14 from 46 to 54 percent. That's in line with the 12:39:23

15 data that you listed in the previous sheet where 12:39:29

16 it lists plus or minus 4 percent, correct? 12:39:31

17 A Plus or minus 4, correct. 12:39:34

18 Q Right. And do you have any sense of how 12:39:37

19 Senator McColley reached this figure for 12:39:45

20 determining if a district is competitive? 12:39:46

21 A I can't speak to his thought process on 12:39:49

22 that. 12:39:54

23 Q Okay. Did you in any way assist him in 12:39:57

24 reaching that conclusion? 12:40:08

25 A I don't know if I would know whether or 12:40:15

1 not I assisted him or not. I mean, there was a 12:40:17  
2 tremendous amount of public testimony about the 12:40:19  
3 existence of competitive districts and what type 12:40:23  
4 of range would be used to determine what was a 12:40:25  
5 competitive district. And I know he had put a lot 12:40:27  
6 of thought into that. 12:40:30

7 I watched the public testimony, as much of 12:40:35  
8 it as I could. I saw him speak about that. I saw 12:40:38  
9 him get questioned about it from members of the 12:40:41  
10 Senate -- 12:40:44

11 Q Okay. 12:40:45

12 A -- so, you know, I think that some people 12:40:45  
13 testified that competitive districts were as much 12:40:53  
14 as plus or minus 5. I think we felt comfortable 12:40:56  
15 with plus or minus 4 being an applicable range. 12:41:00

16 Q So is this definition of competitive 12:41:02  
17 districts, namely plus or minus 4 percent, a 12:41:04  
18 definition that you agree with? 12:41:08

19 A Yes. 12:41:08

20 Q Okay. And in the last ten years, are you 12:41:15  
21 aware of any congressional elections in Ohio where 12:41:20  
22 a party won despite being favored by a partisan 12:41:24  
23 index of 46 percent or less? And that could be -- 12:41:32  
24 and that could be whichever partisan index you 12:41:35  
25 might be using. 12:41:39

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1	A	You might have to unpack that question --	12:41:40
2	Q	Sure.	12:41:45
3	A	-- for me again. It had a lot of little	12:41:46
4		qualifiers.	12:41:48
5	Q	Right. So in the congressional elections	12:41:49
6		held in Ohio in the last ten years, are you aware	12:41:52
7		of any elections where the party that won was --	12:41:54
8		was running in a district where their party had a	12:42:05
9		congressional -- or had an average vote share of	12:42:10
10		46 percent or less under a -- under any partisan	12:42:16
11		index?	12:42:20
12	A	I'm still a little confused by the	12:42:29
13		question. I'm sorry.	12:42:31
14	Q	Okay. So taking any partisan index that	12:42:31
15		you're aware of, are you aware of any	12:42:37
16		congressional race in the last ten years where the	12:42:41
17		winning party was running in a district where	12:42:43
18		their average vote share under a given index was	12:42:47
19		46 percent or less?	12:42:51
20	A	I'm getting tripped up with the average	12:42:53
21		vote share of their -- I mean, are you asking me	12:42:58
22		if there were competitive races in the last	12:43:00
23		decade? Is that what you're asking?	12:43:02
24	Q	Right. So the -- so the question is this:	12:43:04
25		Where on the -- is that -- by this definition --	12:43:08

1 hold on -- strike that. 12:43:16

2 We'll start there, actually. In the last 12:43:25

3 ten -- strike that. 12:43:27

4 Under the map currently in effect, the map 12:43:31

5 preceding this one, are there any districts 12:43:35

6 considered competitive under this definition? 12:43:38

7 A Well, you know, I'm not an expert in 12:43:40

8 political science and the election results. Like, 12:43:51

9 I don't have immediate recall of those elections. 12:43:53

10 But I think the answer to your question is, very 12:43:55

11 few, if any. And that's the point, that we're 12:43:58

12 trying to draw competitive districts now; whereas, 12:44:00

13 the current map doesn't have them. So I think 12:44:04

14 you're keying in on the right point. 12:44:08

15 I do know there were some competitive 12:44:11

16 elections here and there during the last decade, 12:44:13

17 and I can articulate those if you -- if it's 12:44:17

18 helpful to your question. But I think the general 12:44:20

19 answer is, no, there weren't competitive elections 12:44:23

20 in the last decade, and that's what we're trying 12:44:27

21 to rectify. 12:44:30

22 Q Okay. So -- and are you aware of any 12:44:31

23 elections in the last ten years in Ohio that were 12:44:35

24 competitive under this definition where the party 12:44:37

25 who was -- who had a partisan index of less than 12:44:43

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1 50 percent in favor of their party won? 12:44:49

2 A I can't give you a specific example. I 12:44:50

3 have a couple races in mind over the last decade 12:45:01

4 that I think meet your fact pattern, but I'm not 12:45:05

5 sure, and so I don't want to hazard a guess. 12:45:08

6 Q Okay. Okay. 12:45:10

7 MR. KLEIN: Let's just turn -- let's turn 12:45:20

8 to Tab 17. 12:45:21

9 That should be DiRossi 008948. 12:45:42

10 (WHEREUPON, DiRossi Exhibit No. 7 was 12:45:42

11 presented to the witness.) 12:45:49

12 MR. KLEIN: All right. Let's scroll 12:45:49

13 through that so Mr. DiRossi has a chance to take a 12:45:51

14 look at it. 12:45:53

15 BY THE WITNESS: 12:46:09

16 A Thank you. 12:46:09

17 BY MR. KLEIN: 12:46:09

18 Q Have you ever seen this document before? 12:46:10

19 A Yes. 12:46:11

20 Q Did you prepare this document? 12:46:11

21 A Yes. 12:46:17

22 Q When did you prepare this document? 12:46:19

23 A I mean, if you want me to answer with a 12:46:21

24 date, I cannot. 12:46:36

25 Q All right. Well, was it before the 12:46:38

1	General Assembly voted in favor of the now-enacted	12:46:45
2	plan?	12:46:50
3	A Yes. Yes.	12:46:50
4	Q All right. And were you asked to prepare	12:46:59
5	this document?	12:47:02
6	A I don't recall being asked to prepare	12:47:06
7	this --	12:47:08
8	Q Okay.	12:47:09
9	A -- specific document.	12:47:10
10	Q Do you know what the purpose was for	12:47:11
11	preparing this document?	12:47:14
12	A Well, from listening to Senator McColley	12:47:19
13	and his public testimony in the General Assembly,	12:47:21
14	he was touting competitive districts in his	12:47:24
15	initial proposal and the -- and the final	12:47:29
16	proposal.	12:47:31
17	And this was to show him -- or to show	12:47:35
18	whoever might look at it, that the map that was	12:47:38
19	adopted by the General Assembly scored very well	12:47:40
20	when looking at the number of competitive	12:47:46
21	districts it was creating, even compared to not	12:47:47
22	only the other legislative caucus maps that were	12:47:52
23	out there, but the current map. That's the --	12:47:57
24	Q Okay.	12:47:58
25	A -- general point of this document.	12:47:58

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1	Q Right. And did you send this document to	12:48:03
2	Senator McColley?	12:48:05
3	A I don't recall sending this document -- I	12:48:06
4	don't have that recollection.	12:48:11
5	Q Okay. Do you recall sharing this document	12:48:12
6	with anybody else?	12:48:16
7	A I remember giving it over to my attorneys	12:48:16
8	for production.	12:48:24
9	Q Okay. But that's the extent that you	12:48:26
10	recall sharing this?	12:48:31
11	A Yes.	12:48:31
12	Q Okay. Why don't we go through row by row	12:48:31
13	here. This is mostly just confirming that this is	12:48:43
14	similar to what we saw in Tab 5.	12:48:47
15	So McColley here, that's the ultimately	12:48:49
16	enacted plan, correct?	12:48:54
17	A Yes.	12:48:55
18	Q And in the next row where it says	12:48:55
19	"Yuko/Sykes (SB 237)," that is the Senate Democrat	12:48:58
20	proposal of September 29th?	12:49:04
21	A Yeah, so just to explain why there are two	12:49:07
22	there, that proposal initially when it was	12:49:09
23	introduced, as you probably well know, was	12:49:10
24	subsequently refined by the Senate Democrat	12:49:13
25	sponsors. And it -- as you can see at a couple	12:49:16

1 points, it changes the number of competitive 12:49:21  
2 districts downward. 12:49:23  
3 And so that's why I had the 12:49:24  
4 differentiation of two dates of those two 12:49:27  
5 different maps. 12:49:29  
6 Q I'm sorry, did you say it changed the 12:49:30  
7 number of competitive districts downward? 12:49:37  
8 A Yes. 12:49:40  
9 Q Under your definition? 12:49:40  
10 A Well, this -- this is analysis using both 12:49:45  
11 definitions -- 12:49:51  
12 Q Right. 12:49:51  
13 A -- both all data and federal data. 12:49:52  
14 Q But it's only changing competitive 12:49:55  
15 districts downward under the "all data" 12:49:57  
16 definition, right? 12:50:03  
17 A Well, I'd have to -- that's the one that 12:50:04  
18 comes to mind, and it's the one that's obviously 12:50:06  
19 in the top right portion of the document. 12:50:08  
20 I'd have to look through the document to 12:50:10  
21 see if it's in -- shows up anywhere else. 12:50:11  
22 Q Right. But just to confirm what we're 12:50:15  
23 looking at, under the definition of plus or minus 12:50:17  
24 4 for competitive districts using the federal 2012 12:50:21  
25 to 2020 partisan index, it has the same number of 12:50:24

1 competitive districts; is that right? The same 12:50:28  
2 number of competitive districts as between 12:50:28  
3 September 29th and November 10th? 12:50:30  
4 A Yes, both of them -- 12:50:31  
5 Q Okay. 12:50:31  
6 A -- showed five districts. But using all 12:50:32  
7 data, it went from 5 to 4. 12:50:35  
8 Q Okay. And what about "House Dem"; that's 12:50:36  
9 the same thing that we had discussed before for 12:50:41  
10 the House Democrats' proposal? 12:50:43  
11 A Yes. 12:50:49  
12 Q Okay. And then "Current Map," does that 12:50:49  
13 describe the map now in effect through -- through 12:50:51  
14 the next election or -- 12:50:54  
15 A Yes, the one put in place in 2011. 12:50:56  
16 Q Okay. And just confirming here, "FED 12:50:58  
17 data," again, means that all federal partisan 12:51:03  
18 index, right, 2012 to 2020? 12:51:07  
19 A Correct. 12:51:10  
20 Q And then -- 12:51:10  
21 A Correct. 12:51:12  
22 Q -- after that -- and then after that, all 12:51:12  
23 data is all statewide elections 2016 to 2020, 12:51:14  
24 corrects? 12:51:17  
25 A Yes, six-year lookback, state and 12:51:17

1 federal -- state and federal. 12:51:20

2 Q Okay. And then this is analyzing it under 12:51:22

3 the definition that we had discussed, the plus or 12:51:27

4 minus 4 for competitive districts, correct? 12:51:31

5 A Well, the top row is plus or minus 4. 12:51:34

6 I -- 12:51:38

7 Q Right. Right -- 12:51:39

8 A -- just did it under -- yeah. But the top 12:51:40

9 row is plus or minus 4. 12:51:43

10 Q Right. Thank you for clarifying that. 12:51:45

11 So -- so this top row is analyzing the 12:51:47

12 various proposals under the definition of 12:51:51

13 competitiveness that Senator McColley adopts in 12:51:55

14 his testimony, correct? 12:52:00

15 A Well, it's -- again, the -- yes and no. 12:52:01

16 Yes and no. I can elaborate if necessary. 12:52:11

17 Q Sure. Go ahead. 12:52:13

18 A The federal column is what Senator 12:52:14

19 McColley was articulating in his testimony. I 12:52:21

20 think you and I have talked about that, of why 12:52:24

21 that's the appropriate mechanism to use. 12:52:27

22 The other column is -- the all data is 12:52:29

23 something that others were using -- I think the 12:52:36

24 Senate Democrats specifically were using. So we 12:52:40

25 did the analysis both -- or I did the analysis 12:52:42

1 both ways to show that our map was as competitive 12:52:46  
2 or more competitive than any other proposal. 12:52:50  
3 Q Got you. Yeah, I was asking strictly 12:52:52  
4 about the -- asking about the definition of 12:52:56  
5 competitive districts, but let's just -- we'll 12:52:57  
6 just focus in on the left side of the top row, 12:53:00  
7 right? That left column -- 12:53:02  
8 A Okay. 12:53:04  
9 Q -- that is Senator McColley's analysis for 12:53:05  
10 competitive districts and that is the partisan 12:53:08  
11 index he chose, correct? 12:53:10  
12 A Well, yes, the federal thing is what 12:53:11  
13 Senator McColley talked about in his testimony. 12:53:17  
14 But plus or minus 4 isn't just unique to Senator 12:53:18  
15 McColley or other people. There were lots of 12:53:22  
16 testimony about people saying the competitive 12:53:24  
17 districts were up to plus or minus 5. 12:53:27  
18 So obviously there's other people that 12:53:29  
19 would say plus or minus 4 are competitive -- 12:53:32  
20 Q Okay. 12:53:34  
21 A -- if they're advocating for plus or minus 12:53:34  
22 5. 12:53:38  
23 Q Yeah. Right. But this was the metric for 12:53:38  
24 competitiveness settled on by the Senate majority, 12:53:40  
25 correct? 12:53:43

1	A Well, I would -- I would ascribe it to	12:53:44
2	Senator McColley.	12:53:46
3	Q Okay. I'll -- right. So this was the	12:53:48
4	metric for competitiveness settled on by Senator	12:53:51
5	McColley, correct?	12:53:58
6	A I would say so, yes.	12:53:58
7	Q Okay. And did you ever discuss the	12:53:59
8	definition of competitiveness with Senator	12:54:10
9	McColley?	12:54:11
10	A I mean, I do recall speaking with him	12:54:11
11	about how well the map was scoring with	12:54:19
12	competitive districts. And as you can see from	12:54:22
13	his public commentary, he chose to include that in	12:54:24
14	his public commentary before all of the -- the	12:54:27
15	Senate, the House, and the Joint Committee when he	12:54:32
16	gave testimony.	12:54:35
17	Q Right. And did you explain that it was	12:54:35
18	scoring well under this specific definition in	12:54:46
19	particular?	12:54:48
20	MR. McGUIRE: Objection. We're going to	12:54:49
21	assert the legislative privilege with regard to	12:54:50
22	specific contents of communications between -- and	12:54:53
23	conversations between Mr. DiRossi and Senator	12:54:55
24	McColley.	12:55:02
25	MR. KLEIN: Once again, I'm going to	12:55:02

1 dispute that objection, but we'll move on. 12:55:04

2 And we'll again note that we have gotten 12:55:13

3 into this topic and have cut it short because of 12:55:15

4 this objection and so that the record is 12:55:17

5 incomplete on that subject. 12:55:20

6 BY MR. KLEIN: 12:55:29

7 Q If you're not instructed not to answer 12:55:30

8 that question, would you be in a position to 12:55:33

9 answer it? 12:55:35

10 MR. McGUIRE: Objection, we're going to 12:55:37

11 assert the legislative privilege. 12:55:39

12 Don't answer that. 12:55:41

13 MR. KLEIN: Okay. I'll note that we're 12:55:43

14 simply asking if he is in a position to answer the 12:55:50

15 questions and not the contents of those answers. 12:55:53

16 MR. McGUIRE: I understood the question. 12:55:55

17 MR. KLEIN: Okay. I'm just noting it. 12:55:56

18 BY MR. KLEIN: 12:55:59

19 Q So let's scroll down a little bit. So it 12:56:00

20 looks like we're -- it looks like the rest of this 12:56:10

21 document is -- what it's doing is analyzing these 12:56:12

22 proposals we've just discussed under the different 12:56:21

23 metrics for competitiveness; is that right? 12:56:23

24 A Yes. 12:56:25

25 Q Right. So there is one portion here 12:56:25

1 analyzing it at competitiveness being defined as 12:56:31  
2 plus or minus 2, right? 12:56:34  
3 A There is. 12:56:36  
4 Q Right. So that will be where a partisan 12:56:37  
5 infection is between 48 and 52 percent, correct? 12:56:39  
6 A Yes. 12:56:42  
7 Q And then for plus or minus 2.5, that would 12:56:42  
8 be defining competitiveness where there is a 12:56:47  
9 partisan index between 47.5 and 52.5, right? 12:56:50  
10 A I'm just doing the math in my head to 12:56:55  
11 check you. Yes, plus or minus 2 and a half, 47 12:56:58  
12 and a half, 52 and a half. Yes. 12:57:00  
13 Q Yeah. Yeah. I also had to think about 12:57:01  
14 that for a quick second, but I think we both got 12:57:04  
15 it right. 12:57:06  
16 A It's easy to get confused. It's easy to 12:57:06  
17 get confused. 12:57:10  
18 Q Right. And so it looks like in terms of 12:57:10  
19 competitive districts, the number of competitive 12:57:20  
20 districts, the map enacted by the General Assembly 12:57:23  
21 scores the best when you're using the definition 12:57:29  
22 of competitiveness that is at 4 percent using 12:57:34  
23 federal data or a definition of competitiveness at 12:57:38  
24 plus or minus 3.75 percent; is that right? 12:57:46  
25 MR. KLEIN: And we can scroll up so he can 12:57:51

1 see that. 12:57:51

2 BY THE WITNESS: 12:57:54

3 A Say it -- you're saying it scores the best 12:57:54

4 at what data points? 12:57:55

5 BY MR. KLEIN: 12:57:56

6 Q Right. So -- well, I'll just ask. Under 12:57:56

7 which of these analyses does the -- does the map 12:57:59

8 enacted by the General Assembly score the best? 12:58:03

9 A Well, if you're asking for my opinion, I'd 12:58:07

10 say the map scores the best on all of them. It 12:58:10

11 shows that the map as adopted, whether you use all 12:58:13

12 data or federal data, is as competitive if not 12:58:17

13 more competitive than any of the other caucus 12:58:21

14 proposals at -- almost universal on all of these 12:58:24

15 data points. 12:58:29

16 Q Right. 12:58:31

17 A So I -- 12:58:31

18 Q So I should -- 12:58:32

19 A -- know it's -- I know it's very easy to 12:58:32

20 say, well, this one and this one is better than 12:58:33

21 that one and this one. But I think wholistically 12:58:36

22 if you look at this, the takeaway I think for me, 12:58:40

23 since you asked, is, at almost any one of these 12:58:42

24 data points and in either metric this map is as 12:58:44

25 competitive or more competitive than the other 12:58:48

1 proposals and way more competitive, if that's a 12:58:51  
2 technical term, way more competitive than the 12:58:53  
3 current map, which, again -- 12:58:55  
4 Q All right. So -- 12:58:56  
5 A (Indiscernible.) 12:58:56  
6 Q All right. So what I'm asking is, under 12:58:58  
7 which of these analyses does the McColley map have 12:58:59  
8 the highest number of competitive districts as 12:59:04  
9 compared to the McColley map under the other 12:59:07  
10 analyses? 12:59:09  
11 A Well -- okay. So say that again. At 12:59:10  
12 what -- 12:59:16  
13 Q Okay. I -- maybe I should break it down 12:59:17  
14 in terms of what's on the sheet. 12:59:20  
15 So we see the McColley map listed several 12:59:22  
16 times throughout this sheet, right? 12:59:25  
17 A For each data point you're going to have a 12:59:26  
18 score for the McColley map, the two Senate 12:59:29  
19 Democrat versions, the House Democrat version, and 12:59:32  
20 the current version that -- 12:59:35  
21 Q Right. Okay. So -- and there's a number 12:59:36  
22 next to McColley for each -- and do you want to 12:59:40  
23 call it data point? 12:59:43  
24 A Sure. Thank you. 12:59:45  
25 Q So for each data point -- and when we say 12:59:46

1 that, we're talking about a definition of partisan 12:59:50  
2 index and for a competitive district. 12:59:52

3 For each data point there's a number 12:59:56  
4 listed next to the map name, right? 12:59:58

5 A Yes. 13:00:00

6 Q And that's the number of competitive 13:00:03  
7 districts, correct? 13:00:05

8 A Yes. 13:00:06

9 Q So when you look at each time McColley is 13:00:06  
10 listed, in which instances on that sheet is it the 13:00:15  
11 highest compared to the other instances where it's 13:00:19  
12 listed? 13:00:26

13 A Well, this -- this kind of goes back to 13:00:26  
14 our previous conversation of comparing federal 13:00:28  
15 election analysis to EA53. And I understand -- I 13:00:30  
16 understand your question, and kind of the same 13:00:34  
17 thing as before. But they -- we've got to 13:00:35  
18 understand that these are different scorings using 13:00:38  
19 different election results from different time 13:00:43  
20 periods, six years or ten years, federal elections 13:00:45  
21 versus state and federal elections. 13:00:50

22 So I -- I am very hesitant to answer the 13:00:51  
23 question along the lines of which is higher and 13:00:53  
24 which is lower because they're different. 13:00:56

25 And the number may be higher, but it 13:01:01

1 doesn't necessarily mean that it's an 13:01:03  
2 apples-to-apples comparison. 13:01:07

3 Q Right. Okay. So let's just -- maybe we 13:01:07  
4 should -- strike that. 13:01:09

5 So when we are defining competitive 13:01:25  
6 districts as plus or minus 4, which partisan index 13:01:28  
7 gives the McColley map more competitive districts? 13:01:33  
8 Is it federal data or all data? 13:01:36

9 A Well, again, I mean, you're looking at the 13:01:43  
10 same information on the screen that I am. I mean, 13:01:46  
11 I just think they're very different and not fair. 13:01:49  
12 I mean -- but I will -- I will say that using the 13:01:52  
13 federal election lens of ten-year lookback, there 13:01:54  
14 are seven competitive districts, which is the most 13:02:00  
15 of any map that I saw put before the General 13:02:02  
16 Assembly. 13:02:04

17 And using the other scoring mechanism, 13:02:04  
18 there are an equal amount to the next highest map. 13:02:09  
19 So five. But seven -- I know seven is more than 13:02:12  
20 five, but seven should not be compared to five. 13:02:16  
21 They're different lenses. 13:02:19

22 Q Okay. All right. So then maybe we'll -- 13:02:22  
23 why don't we move vertically. 13:02:25

24 So we see where it says McColley for plus 13:02:27  
25 or minus 4, plus or minus 3.75, it says there, 13:02:30

1 correct? 13:02:35

2 A Yes. Under the federal analysis, yes. 13:02:36

3 Q Yeah, and then under federal analysis, 13:02:38

4 when we go down to plus or minus 3.5 for a 13:02:40

5 definition of competitive districts, we've got six 13:02:43

6 competitive districts for the McColley map, 13:02:45

7 correct? 13:02:48

8 A That is correct. 13:02:48

9 Q And why don't we keep scrolling down. 13:02:48

10 And then if we go down to a definition of 13:02:56

11 competitiveness of plus or minus 2.5 using federal 13:02:59

12 data, we've got four competitive districts for 13:03:03

13 McColley, correct? 13:03:05

14 A You -- wait. Did you say plus or minus 13:03:06

15 2.5? 13:03:12

16 Q Yeah, 2.5. 13:03:13

17 A Yes. Okay. Yes, you're right. 13:03:14

18 Q And then we go down to plus -- then we go 13:03:16

19 down to plus or minus 2 percent using the federal 13:03:19

20 partisan index, it's two competitive districts 13:03:22

21 under the McColley plan, correct? 13:03:24

22 A Yes. 13:03:26

23 Q Okay. 13:03:26

24 MR. KLEIN: Let's pull up Tab 18. I'd 13:03:35

25 like to mark this as an exhibit. And I just want 13:03:50

1 to make sure that I marked the last one, too. 13:03:52  
2 Thanks, Ethan. 13:03:59  
3 (WHEREUPON, DiRossi Exhibit No. 8 was 13:03:59  
4 presented to the witness.) 13:04:10  
5 BY MR. KLEIN: 13:04:10  
6 Q All right. So I am representing to you 13:04:12  
7 that you produced this document to us. 13:04:13  
8 Have you seen this document before? 13:04:15  
9 A Yeah, if you could just scroll through 13:04:22  
10 it -- 13:04:24  
11 Q Yeah, I -- 13:04:24  
12 A -- very, very fast to make sure I -- 13:04:25  
13 because I'm pretty sure it's a big spreadsheet, 13:04:26  
14 right? 13:04:28  
15 Yes, it looks familiar. 13:04:38  
16 Q Okay. And so did you prepare this 13:04:42  
17 document? 13:04:46  
18 A Yes. 13:04:48  
19 Q Okay. Do you remember when you prepared 13:04:48  
20 this document? 13:04:52  
21 A I think this was one of the first things I 13:04:52  
22 did after the budget was over in June of this 13:04:58  
23 year, well before the census data was received. 13:05:05  
24 So this is one of my get-organized 13:05:11  
25 documents. Now, there are a couple different 13:05:14

1 versions of this, so -- 13:05:17

2 Q Right. 13:05:18

3 A -- as I'm sure we'll talk about the yellow 13:05:18

4 lines, but -- 13:05:21

5 Q Right. So -- 13:05:23

6 A -- depending on which version it is, when 13:05:23

7 it was produced. 13:05:26

8 Q Yeah. I was actually about to ask about 13:05:27

9 those yellow lines. 13:05:30

10 MR. KLEIN: Why don't we scroll down to 13:05:31

11 the bottom where -- yeah, just towards the bottom 13:05:33

12 of where the data is. 13:05:35

13 BY MR. KLEIN: 13:05:35

14 Q So we have two yellow lines here, correct? 13:05:43

15 A Yes. 13:05:43

16 Q And so -- we're below row 134. 13:05:47

17 And so do you know why those are 13:05:50

18 highlighted in yellow? 13:05:54

19 A Yeah, those specific U.S. rep 11 and U.S. 13:05:55

20 rep 15? 13:06:03

21 Q Mm-hm. 13:06:03

22 A Yeah, so those were -- if you -- I don't 13:06:04

23 know if you follow Ohio elections in our 13:06:08

24 congressional delegation, but these were two seats 13:06:14

25 that were vacant and there were special elections 13:06:16

1 that were just held a couple months ago. 13:06:19

2 And so these said "vacant," and then once 13:06:21

3 the congressional election results were done -- or 13:06:27

4 the election was held, I filled in the appropriate 13:06:32

5 information. 13:06:34

6 And I probably kept them highlighted 13:06:35

7 because I either messed up and forgot to 13:06:39

8 unhighlight those cells, or I wasn't 100 percent 13:06:42

9 actually sure that I had the correct address and 13:06:46

10 it was kind of a mental note to me to go back and 13:06:49

11 verify that address. 13:06:51

12 Q Okay. So it's -- so -- all right. 13:06:52

13 Did you consider this document when you 13:07:08

14 were drawing congressional maps? 13:07:11

15 A Well, this document, not specifically. 13:07:11

16 But one of the things that I knew was important to 13:07:19

17 the senators that I was working with was to avoid 13:07:24

18 pairing of incumbents in districts, whether those 13:07:29

19 were Republican incumbents in the same district or 13:07:31

20 Democrat incumbents in the same district or 13:07:37

21 Republican and Democrat in the same district, to 13:07:40

22 try to avoid those wherever possible. 13:07:43

23 So obviously in order to do that, you have 13:07:45

24 to have some knowledge of where the residence is. 13:07:47

25 And I know we all know that for Congress, you 13:07:50

1 don't have to live in your congressional district 13:07:53  
2 to be eligible to be a candidate. But 13:07:55  
3 nonetheless, we were taking care to try to avoid 13:07:58  
4 the pairing of or double-bunking of incumbents in 13:08:00  
5 the districts. And so -- 13:08:05  
6 Q Okay. 13:08:06  
7 A -- but for the legislative and the 13:08:07  
8 congressional, that's what -- this document was, 13:08:10  
9 you know, able to track residency. 13:08:12  
10 Q Yeah. So when you're in Maptitude and 13:08:13  
11 you're looking at the geography portion of the 13:08:17  
12 screen, the actual map, are you able to see where 13:08:19  
13 incumbent addresses are in Maptitude. 13:08:23  
14 A Yes. 13:08:25  
15 Q And did you have that up all of the time? 13:08:25  
16 A No. 13:08:31  
17 Q Most of the time? 13:08:33  
18 A We're talking about congressional? 13:08:34  
19 Q Yes. 13:08:37  
20 A Yeah, so, look, there's only 15 of them, 13:08:38  
21 right? So it's -- you kind of under- -- you kind 13:08:42  
22 of remember. Whereas in the legislative, there's 13:08:46  
23 132, and it's 33 in the Senate and 99 in the 13:08:49  
24 House. So, you know, it was pretty easy to kind 13:08:53  
25 of remember what county and what general area 13:08:55

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	members lived in.	13:08:58
2	So it was up early on, and then it wasn't	13:08:59
3	needed anymore; I had it in memory.	13:09:01
4	Q Okay. So while you didn't always have	13:09:04
5	incumbent addresses up, you knew where they lived,	13:09:07
6	so it wasn't always necessary?	13:09:09
7	A Yeah, in order to avoid putting them in	13:09:11
8	the same district where possible, something that	13:09:15
9	we were very good at doing and others were not,	13:09:18
10	other proposals, you know, yeah, I needed to know	13:09:22
11	where they were.	13:09:24
12	Q Okay.	13:09:25
13	MR. KLEIN: So I think I'm going to	13:09:38
14	reserve my time, but I think I can turn it over	13:09:39
15	to -- to the counsel for the League of Women	13:09:44
16	Voters.	13:09:47
17	THE WITNESS: Could we take a five-minute	13:09:47
18	break?	13:09:55
19	MR. MCGUIRE: I'm sorry, the witness,	13:09:55
20	Mr. DiRossi, is asking if we can take a very, very	13:09:56
21	quick break before we start the next question.	13:09:59
22	MR. KLEIN: So I know you said you had a	13:10:02
23	hard stop at 3:00. We came back a little bit late	13:10:03
24	from the last break as a professional courtesy.	13:10:07
25	Could we just get seven extra minutes past	13:10:10

1 that three-minute -- rather, could we get seven 13:10:12  
2 extra minutes past that 3:00 p.m. hard stop? 13:10:21  
3 MR. McGUIRE: I'll go five. 13:10:24  
4 MR. KLEIN: Okay. 13:10:25  
5 MR. McGUIRE: If he can run out -- he just 13:10:27  
6 needs to run to the restroom. 13:10:28  
7 THE WITNESS: I'll go to the bathroom as 13:10:30  
8 quick as possible. 13:10:32  
9 MR. KLEIN: Okay. 13:10:33  
10 MR. McGUIRE: We won't even leave. 13:10:33  
11 MR. KLEIN: Okay. So why don't we go off 13:10:35  
12 the record. We'll come back at 2:15. 13:10:37  
13 THE VIDEOGRAPHER: The time is 1:10. We 13:10:40  
14 are off the record. 13:10:42  
15 (WHEREUPON, a recess was had.) 13:13:02  
16 THE VIDEOGRAPHER: The time is 1:13. We 13:13:02  
17 are on the record. 13:13:07  
18 EXAMINATION 13:13:09  
19 BY MS. BENDER: 13:13:09  
20 Q Mr. DiRossi, hello. My name is Brady 13:13:09  
21 Bender. I'm here representing the League of Women 13:13:11  
22 Voters Relators today. Thank you for being here. 13:13:16  
23 A Hello. Hello. 13:13:17  
24 Q I wanted to quickly ask you some more 13:13:18  
25 questions about DiRossi Exhibit 7. 13:13:21

1 MS. BENDER: So if we could pull that back 13:13:23  
2 up. 13:13:25  
3 (Exhibit shared.) 13:13:33  
4 BY MS. BENDER: 13:13:33  
5 Q And apologies if I'm not looking directly 13:13:33  
6 at the camera. I'm going between a couple of 13:13:35  
7 screens here. 13:13:38  
8 So, Mr. DiRossi, can you -- I just want to 13:13:38  
9 confirm this measure on the right-hand side using 13:13:44  
10 all data. All data there is all statewide 13:13:46  
11 elections from the last ten years; is that right? 13:13:52  
12 Or can you clarify? 13:13:55  
13 A I think -- no, that is not right. 13:13:56  
14 Q Okay. 13:13:59  
15 A All data is a six-year lookback of state 13:14:01  
16 and federal statewide races. 13:14:05  
17 Q Okay. Great. And is that the same as 13:14:08  
18 EA53 in your Maptitude set? 13:14:13  
19 A Yes. 13:14:15  
20 Q Okay. And can I ask -- we talked about 13:14:16  
21 when you prepared this document, and you said that 13:14:26  
22 it was prior to the Senate -- excuse me, prior to 13:14:28  
23 voting to enact the final map. Can you give me a 13:14:34  
24 little bit more detail on that. 13:14:39  
25 Was that just before? Was it a few days 13:14:40

1 before? 13:14:43

2 A Yeah, that's a great question. I'm 13:14:46

3 racking my brain trying to pinpoint that. I don't 13:14:48

4 think I can give you any more definitive date of 13:14:52

5 when that -- when I created that document. 13:14:55

6 Q Okay. I'm -- 13:14:59

7 A As is with a lot of legislative process, 13:15:03

8 it's a flurry of activity, and I don't recall. 13:15:06

9 Q Okay. 13:15:08

10 MS. BENDER: We can take this down. 13:15:10

11 BY MS. BENDER: 13:15:12

12 Q So I want to go back to the discussion of 13:15:19

13 certain indices that you used, which would have 13:15:22

14 included those indices earlier. 13:15:24

15 You acknowledged earlier that Maptitude 13:15:26

16 included some of those indices in that those 13:15:28

17 indices showed certain election results. The 13:15:34

18 election results data was actually uploaded into 13:15:38

19 Maptitude; is that correct? 13:15:41

20 A Okay. So help me understand -- indices, 13:15:41

21 results -- and what was the other term you used in 13:15:48

22 that question to make sure I understand the -- 13:15:50

23 Q Of course. I'll clarify. 13:15:52

24 So when you get Maptitude, it doesn't come 13:15:54

25 preloaded with election results in it, does it? 13:15:57

1           A I do this once every ten years. I don't           13:16:00  
2 know -- when I received the license and downloaded           13:16:09  
3 and installed Maptitude, it had sample data in it           13:16:13  
4 I think from the previous decade, and I don't know           13:16:17  
5 if that was just population geography or -- I           13:16:19  
6 can't say for sure what that was.           13:16:23

7           Q So you are not sure whether partisan           13:16:26  
8 election results would have been preloaded in           13:16:29  
9 Maptitude or loaded thereafter?           13:16:32

10          A I can't say. I think I said earlier that           13:16:33  
11 working with our contractor, Ohio University, and           13:16:40  
12 the Common Unified Redistricting Database project,           13:16:44  
13 that that's where a lot of the census data and the           13:16:49  
14 election results and other things were married           13:16:51  
15 together. And ultimately then I had to have a           13:16:53  
16 technical consultant put that stuff into the           13:16:56  
17 computer. I'm not capable of doing that.           13:16:59

18          Q Okay. So you agree that these partisan --           13:17:00  
19 or excuse me, these indices of partisan election           13:17:04  
20 results show up in Maptitude, as we discussed           13:17:07  
21 earlier.           13:17:10

22                 Do you know who created those indices, who           13:17:10  
23 decided upon what elections were included in them?           13:17:14

24          A Are you asking just about the           13:17:17  
25 congressional one, or are you asking about the           13:17:23

1 ones that -- the EA53 from the legislative 13:17:25  
2 process? 13:17:28

3 Q Well, let's start with EA53. 13:17:28

4 A Yeah, I would refer you in large part to 13:17:32  
5 my deposition from that where I had a long 13:17:37  
6 discussion about that. 13:17:42

7 I mean, there was a -- a very long process 13:17:43  
8 of the Chief of Staff of the Ohio Senate, the 13:17:47  
9 Chief of Staff of the -- the Ohio Senate majority, 13:17:50  
10 the Ohio Senate minority, and the Ohio House 13:17:54  
11 majority, those three leaders and their staff 13:17:59  
12 having a conversation about putting their hands on 13:18:01  
13 publicly available election results and underlying 13:18:04  
14 geography so that there could be some commonality. 13:18:09  
15 And a lot of that, as you -- I'm sure you know, is 13:18:12  
16 controlled by Article 11 and actually referred to 13:18:15  
17 in Article 11 about the -- some of the elections 13:18:17  
18 that you would use. 13:18:19

19 And so that's -- that's kind of the 13:18:23  
20 genesis of what is lovingly called EA53, for 13:18:26  
21 whatever reason, in the computer system that was a 13:18:30  
22 holdover for congressional. 13:18:33

23 Q And who would have created the FEDEA 13:18:34  
24 index? 13:18:37

25 A Well, "created" is -- 13:18:38

1 Q Just a -- 13:18:44

2 A -- it is a collection of election results. 13:18:45

3 So those election results are just the election 13:18:47

4 results provided by the Secretary of State's 13:18:50

5 Office who -- is that what your question is, or 13:18:55

6 did you have another question? 13:18:57

7 Q Who would have decided which election 13:18:58

8 results from the Secretary of State's Office were 13:19:00

9 included in that index? 13:19:03

10 A Well, I spoke to the President and Senator 13:19:05

11 McColley about what index we should be using 13:19:14

12 and -- 13:19:20

13 Q Okay. And so -- 13:19:20

14 A -- why I thought we should be using the 13:19:21

15 federal election results for the federal districts 13:19:23

16 and why that made an abundant amount of sense. 13:19:27

17 Q And when you say that, you mean the 13:19:30

18 federal EA index? 13:19:33

19 A Yeah, federal -- 13:19:36

20 Q You talked about using the federal EA 13:19:37

21 index? 13:19:39

22 A Statewide -- 13:19:40

23 MR. McGUIRE: Objection. I'm going to 13:19:41

24 object on the basis of legislative privilege. 13:19:42

25 This is getting into substantive conversations 13:19:45

1 between Mr. DiRossi and members of the General 13:19:47  
2 Assembly regarding the legislative process. 13:19:53  
3 MS. BENDER: Okay. Well, I will just 13:19:56  
4 respond that we don't agree with that objection, 13:20:00  
5 but I will move on for the sake of time. 13:20:02  
6 BY MS. BENDER: 13:20:04  
7 Q What other election analyses did you 13:20:05  
8 consider -- or, excuse me, election analyses, 13:20:07  
9 these indexes -- I think you called them election 13:20:11  
10 analyses earlier -- did you consider beyond FEDEA 13:20:15  
11 and election -- or -- and EA53? 13:20:18  
12 A Well, as Mr. Klein and I talked about, I 13:20:24  
13 mean, there were only a couple that were up on my 13:20:27  
14 screen, you know, throughout the process at 13:20:29  
15 various points. EA53 was there because it was a 13:20:31  
16 holdover from legislative. The federal election 13:20:35  
17 analysis you and I now have talked about, that 13:20:37  
18 that was on the screen. 13:20:40  
19 The only other data point for election 13:20:41  
20 results was the recent presidential election was 13:20:44  
21 available both -- I think I had both the Trump 13:20:48  
22 number and the Biden number on the screen at the 13:20:50  
23 same time when that would be a pair. 13:20:55  
24 Q Okay. All right. I'd like to -- we can 13:20:58  
25 move on from that topic. I do want to talk a 13:21:02

1 little bit more about Maptitude. 13:21:05

2 You mentioned earlier that Senator 13:21:06

3 McColley did not work in Maptitude, but -- and 13:21:08

4 that you were the only one working for the Senate 13:21:10

5 majority in Maptitude. 13:21:13

6 So when you were doing Maptitude work, 13:21:14

7 were you doing -- did you do Maptitude work at 13:21:16

8 Senator McColley's direction? 13:21:20

9 A Did I? 13:21:22

10 Q Yes. 13:21:26

11 A I mean, yes, the -- yes. Yes -- 13:21:26

12 Q And -- 13:21:30

13 A -- the bill was his direction. 13:21:31

14 Q And he would have provided you guidance on 13:21:33

15 the maps as you were drawing in Maptitude? 13:21:35

16 MR. McGUIRE: Objection, we're going to 13:21:38

17 assert the legislative privilege. 13:21:39

18 MS. BENDER: Okay. Again, I'll say we 13:21:44

19 don't agree with the assertion, but we will move 13:21:46

20 on. 13:21:49

21 BY MS. BENDER: 13:21:49

22 Q Did he provide feedback on maps that you 13:21:49

23 drew in Maptitude? 13:21:51

24 MR. McGUIRE: Objection, we're going to 13:21:53

25 assert the legislative privilege. 13:21:56

1	Don't answer that.	13:21:58
2	MS. BENDER: Okay. The same response, and	13:21:59
3	we'll move on.	13:22:01
4	BY MS. BENDER:	13:22:01
5	Q So regarding both of those questions, if	13:22:02
6	not for your instruction not to answer those	13:22:09
7	questions, could you have answered them?	13:22:12
8	MR. McGUIRE: Objection, we assert the	13:22:13
9	legislative privilege.	13:22:16
10	Don't answer that question.	13:22:17
11	MS. BENDER: Okay. In none of these	13:22:23
12	questions did I actually ask about content -- or	13:22:25
13	that specific last question was not asking about	13:22:28
14	the content nor was I asking about the content of	13:22:30
15	any guidance or feedback. So, again, we would	13:22:33
16	disagree with the assertion of the privilege.	13:22:36
17	MR. McGUIRE: Noted.	13:22:41
18	BY MS. BENDER:	13:22:43
19	Q Okay. Besides Senator McColley, did any	13:22:43
20	other individual see maps that you had drawn in	13:22:46
21	Maptitude as in the -- as you were in the process	13:22:50
22	of working on them?	13:22:53
23	A So in the process of working on them, does	13:22:54
24	that mean -- what -- can you help me narrow down	13:23:05
25	that timeline that you're looking for?	13:23:08

1 Q Okay. There are two questions here. So 13:23:09  
2 as the maps were evolving in Maptitude throughout 13:23:11  
3 the time period in which they're evolving in 13:23:14  
4 Maptitude, would there be any others that would 13:23:16  
5 have seen those maps over the broad time period? 13:23:19

6 A Yeah, I mean, the vast majority of the 13:23:24  
7 time that I was working at my computer, the 13:23:26  
8 computer in the office that has the Maptitude in 13:23:29  
9 the William Green Building, I was alone. 13:23:33

10 Or on days that Blake would have been 13:23:35  
11 there, he would have been working, you know, on 13:23:38  
12 whatever he was working on. 13:23:41

13 And you said except for Senator Huffman 13:23:45  
14 and except for Senator McColley? 13:23:48

15 Q I did not say except for Senator Huffman. 13:23:50

16 But to clarify, on both of those -- both 13:23:53  
17 of those individuals, are they among the people 13:23:55  
18 that would have been there at some time other than 13:23:58  
19 the time that you just referred to when you were 13:24:01  
20 alone? 13:24:03

21 A Okay. All right. I -- 13:24:04

22 Q Sorry. That was -- 13:24:06

23 A -- (indiscernible) your question. Yeah, 13:24:07  
24 no problem. 13:24:08

25 Are you saying were they physically there? 13:24:09

1 Or are you saying did they see the map as it was 13:24:12  
2 going through its evolution -- 13:24:15  
3 Q I'd like to know -- 13:24:17  
4 A -- (indiscernible) get to. 13:24:19  
5 Q I'd like to ask both questions. 13:24:19  
6 So, first, did either of them visit -- 13:24:21  
7 visit the office in which you were drawing 13:24:23  
8 Maptitude maps while you were drawing them? 13:24:26  
9 A Senat- -- President Huffman, yes. Senator 13:24:28  
10 McColley, no. 13:24:31  
11 Q Okay. And were there any other 13:24:31  
12 individuals then beyond those two and Blake that 13:24:33  
13 visited the office as you were drawing? 13:24:35  
14 A Well, you said "beyond those two." I said 13:24:39  
15 no for Senator McColley. 13:24:42  
16 Q Yeah, beyond -- 13:24:44  
17 A I think I mentioned it -- I referenced a 13:24:45  
18 November 9th meeting that the Speaker was there 13:24:48  
19 for, the Chiefs of Staff were there for. At 13:24:50  
20 various times, I had in-house counsel from the 13:24:56  
21 House and Senate that were present there and -- 13:25:00  
22 and external counsel. 13:25:06  
23 Q Okay. And would any of the -- or which -- 13:25:08  
24 would any of these individuals have seen your 13:25:21  
25 Maptitude maps on your computer when they visited? 13:25:23

1           A I think -- the November 9th meeting, I           13:25:35  
2 don't think the computers were on. I don't recall           13:25:37  
3 using the computers. President Huffman would have           13:25:39  
4 seen the computers on.           13:25:45

5           Q Okay. Anyone else?           13:25:48

6           A Blake -- Blake would have seen the           13:25:50  
7 computers on. Whether he saw what was on the           13:25:54  
8 screen or not, that's not a question for me. But           13:25:57  
9 he was -- you know, he was there on days he was           13:26:00  
10 there.           13:26:01

11           And I can't speak to what others would           13:26:03  
12 have seen as far as counsel. I just --           13:26:06

13           Q Were others --           13:26:10

14           A -- don't recall.           13:26:12

15           Q Were there any others that were there           13:26:13  
16 while the computers were on?           13:26:15

17           A Others that were there when the computers           13:26:16  
18 were on? So we've talked about the President, the           13:26:21  
19 Speaker, Blake, myself, the Chiefs of Staff,           13:26:25  
20 in-house counsel, exterior coun- -- external           13:26:29  
21 counsel.           13:26:33

22           For congressional redistricting, I -- I'm           13:26:38  
23 not sure I can think of anybody else that was           13:26:40  
24 there sitting here right now.           13:26:42

25           Q Okay. And did you convey information           13:26:43

1	about the partisan leanings of the districts that	13:27:01
2	you were drawing to Senate President Huffman?	13:27:04
3	MR. McGUIRE: Objection, we're going to	13:27:08
4	assert the legislative privilege.	13:27:11
5	BY MS. BENDER:	13:27:17
6	Q Okay. I'm going to ask the same question	13:27:17
7	about Speaker Cupp?	13:27:19
8	MR. McGUIRE: The same objection,	13:27:21
9	legislative privilege.	13:27:24
10	BY MS. BENDER:	13:27:25
11	Q Okay. Representative Oelslager?	13:27:27
12	MR. McGUIRE: The same objection,	13:27:28
13	legislative privilege.	13:27:30
14	BY MS. BENDER:	13:27:31
15	Q Any other legislative leadership?	13:27:31
16	MR. McGUIRE: The same objection, we	13:27:35
17	assert the legislative privilege.	13:27:36
18	BY MS. BENDER:	13:27:37
19	Q And any others outside of the legislature?	13:27:37
20	MR. McGUIRE: We will insert the	13:27:41
21	legislative privilege to the extent that includes	13:27:44
22	members of any legislative staff in addition to	13:27:46
23	legislators.	13:27:50
24	But you can answer for anyone other than	13:27:54
25	those two groups.	13:27:56

1	BY THE WITNESS:	13:27:57
2	A Can you -- so you're asking -- can you	13:27:58
3	just repeat the specific question that --	13:27:59
4	BY MS. BENDER:	13:27:59
5	Q Would you have --	13:28:01
6	A -- would apply to --	13:28:01
7	Q -- conveyed --	13:28:04
8	A -- nonlegislative staff?	13:28:04
9	Q Did you convey information about the	13:28:05
10	partisan leanings of districts in the maps that	13:28:07
11	you were drawing to any individuals?	13:28:09
12	I asked obviously more about a broader	13:28:11
13	group, but your counsel instructed you to answer	13:28:14
14	about a narrower group.	13:28:15
15	MR. McGUIRE: Other than legislators or	13:28:21
16	the staff members of legislators or -- and	13:28:23
17	counsel. And counsel. I'm sorry.	13:28:25
18	BY THE WITNESS:	13:28:27
19	A The only thing I can think of is, the day	13:28:29
20	that Senate Bill 258 was -- the second sub bill	13:28:33
21	happened, there was a distribution that went out	13:28:43
22	to a distribution -- email distribution that	13:28:44
23	included the media and members of the public that	13:28:49
24	included an attachment that included the federal	13:28:54
25	election analysis number for every district that	13:28:57

1	was in the bill.	13:28:59
2	MS. BENDER: Okay. And as to all of those	13:29:03
3	objections, I would again say that we do not agree	13:29:05
4	that those are covered by the legislative	13:29:07
5	privilege, and we can move forward.	13:29:10
6	BY MS. BENDER:	13:29:16
7	Q Can you tell me, Mr. DiRossi, what was	13:29:16
8	your understanding of the requirements you had to	13:29:18
9	meet in drawing the congressional map?	13:29:19
10	A Well, there are several obviously. And	13:29:23
11	there are --	13:29:28
12	MR. McGUIRE: And, again, please don't	13:29:29
13	talk about any instructions given to you by any	13:29:31
14	member of the legislature or their staff. When	13:29:33
15	you answer it, you can answer it other than that.	13:29:36
16	BY THE WITNESS:	13:29:38
17	A The constitution has a number of	13:29:40
18	provisions that it talks about on the	13:29:42
19	construction -- as I call it, the construction of	13:29:47
20	districts, whether or not a subdivision of certain	13:29:49
21	population can be split, whether it shouldn't be	13:29:54
22	split, whether there should be districts made out	13:29:57
23	of -- in Franklin County, I know there's a page of	13:30:01
24	language that deals specifically with Franklin	13:30:04
25	County, not by name but by population amounts for	13:30:07

1 Columbus and Franklin County. 13:30:10

2 There's obviously language that talks 13:30:13

3 about drawing districts from whole counties and 13:30:15

4 whole political subdivisions. There are sections 13:30:21

5 of the constitution that talk about what I call, 13:30:24

6 you know, no double-dipping, so to speak. So if 13:30:27

7 you've got a district that comes into a county, it 13:30:30

8 has to be contiguous to itself inside that county. 13:30:34

9 That is a mandatory requirement. 13:30:37

10 Also, you're not allowed to have two 13:30:39

11 districts share portions of county population in 13:30:43

12 the same two districts unless those counties are 13:30:51

13 greater than 400,000. That is a provision of the 13:30:54

14 constitution, which is new to Ohio. 13:30:58

15 And obviously there are some, you know, 13:31:00

16 language in the constitution dealing with 13:31:05

17 compactness, contiguity, you know, districts being 13:31:06

18 equal as practicable and -- for population 13:31:14

19 purposes. 13:31:17

20 And those are the ones that come to mind. 13:31:17

21 Q And what about partisanship? 13:31:20

22 A There is language that says -- and I'm 13:31:23

23 paraphrasing because I am definitely not a 13:31:27

24 constitutional scholar -- to not unduly favor or 13:31:30

25 disfavor a political party or their incumbents. 13:31:35

1 Q And what was your understanding of the 13:31:37  
2 meaning of that language? 13:31:38  
3 A Yeah, I -- I relied on the advice of 13:31:39  
4 counsel for that. Like I said, I am not a 13:31:42  
5 constitutional scholar. I can't give you a 13:31:44  
6 definitive answer on that. It's new language, and 13:31:51  
7 I relied on the advice of counsel to understand 13:31:54  
8 that and -- 13:31:55  
9 Q And what -- 13:31:55  
10 A -- to direct that -- 13:31:56  
11 Q Sorry to interrupt. 13:31:56  
12 And were you given instructions regarding 13:31:59  
13 these requirements beyond the advice of counsel? 13:32:01  
14 A Specifically to draw competitive 13:32:04  
15 districts. 13:32:10  
16 Q Okay. Beyond that? 13:32:13  
17 A So can you help me -- you're asking was I 13:32:13  
18 given direction on what? 13:32:19  
19 Q Did you receive -- 13:32:22  
20 A (Indiscernible.) 13:32:22  
21 Q -- instructions on how to comply with the 13:32:22  
22 constitutional requirements beyond drawing 13:32:26  
23 competitive districts? 13:32:28  
24 MR. McGUIRE: Again, please don't provide 13:32:30  
25 anything that counsel told you or anything 13:32:32

1 provided to you by any legislators or their staff, 13:32:34  
2 any direction on that issue. 13:32:38  
3 THE WITNESS: Yeah. 13:32:39  
4 BY THE WITNESS: 13:32:40  
5 A I would say, like I said, I -- I mean, I 13:32:40  
6 am not a lawyer, I'm not a legal scholar, not a 13:32:43  
7 constitutional scholar. 13:32:46  
8 I know that, as I've said before, Senator 13:32:47  
9 McColley gave public testimony in a number of 13:32:51  
10 hearings where he articulated what he thought that 13:32:53  
11 meant, and I -- I listened to that. 13:32:56  
12 MS. BENDER: Counsel, is it your position 13:33:04  
13 that the instructions that would be given to 13:33:06  
14 Mr. DiRossi on how to draft a congressional map 13:33:08  
15 are privileged and immune from discovery in a 13:33:11  
16 legal challenge to the drafting of the map? 13:33:16  
17 MR. McGUIRE: Yes, that's why I'm 13:33:18  
18 asserting the privilege. 13:33:20  
19 MS. BENDER: Okay. 13:33:21  
20 BY MS. BENDER: 13:33:22  
21 Q Mr. DiRossi, just a -- 13:33:22  
22 MS. BENDER: Actually, I think I am 13:33:36  
23 actually done for now. 13:33:36  
24 Spencer, do you have any follow-up 13:33:36  
25 questions that you'd like to ask? 13:33:38

Transcript of Raymond DiRossi  
Conducted on December 7, 2021

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1	MR. KLEIN: I do have a few, but if -- you	13:33:41
2	know, if you want to keep going, that's fine, but	13:33:44
3	we could also -- I could also jump back in.	13:33:45
4	MS. BENDER: I'm happy to have you jump	13:33:48
5	back in.	13:33:50
6	MR. KLEIN: Okay.	13:33:52
7	Can we pull up Tab 6. So not actually --	13:34:06
8	we were hoping to look at Tab 6, not Exhibit 6.	13:34:33
9	Sorry about that. I just thought you were pulling	13:34:36
10	it up, and then I realized you misunderstood.	13:34:37
11	THE TECHNICIAN: Apologies.	13:34:40
12	MR. KLEIN: No, that's on me. I should	13:34:42
13	have been more clear about that.	13:34:44
14	(WHEREUPON, DiRossi Exhibit No. 10 was	13:34:44
15	presented to the witness.)	13:34:44
16	FURTHER EXAMINATION	13:34:52
17	BY MR. KLEIN:	13:34:52
18	Q Okay. So, Mr. DiRossi, I'm going to	13:34:52
19	represent that this is a screenshot from Maptitude	13:34:54
20	taken after we uploaded the SHP files you produced	13:34:56
21	of the enacted plan to the system. And as you can	13:35:02
22	see, we've also put county borders over it as well	13:35:06
23	as the district borders from the map for the	13:35:09
24	enacted plan.	13:35:16
25	So let's look down at District 1. That	13:35:18

1 includes Cincinnati, correct? 13:35:22

2 A Yes. 13:35:27

3 Q And under Article 19, Cincinnati has to be 13:35:27

4 kept whole, correct? 13:35:32

5 A Yeah, I would just say the caveat, to the 13:35:34

6 extent that it matters, the constitution does not 13:35:39

7 specifically say Cincinnati -- 13:35:41

8 Q Right. 13:35:43

9 A -- it provides a population calculation 13:35:43

10 that, for at least this decade, applies to 13:35:46

11 Cincinnati and another one or two political 13:35:50

12 subdivisions in the state. 13:35:56

13 Q Fair. Fair. So -- and Cincinnati is kept 13:35:57

14 whole within the 1st District, correct? 13:36:03

15 A It is. 13:36:04

16 Q Okay. Now, looking at the 1st District, 13:36:05

17 does it remain whole within Hamilton County? 13:36:10

18 A It does not. 13:36:13

19 Q Okay. And what other counties does it 13:36:14

20 include? 13:36:21

21 A It includes all of Warren County. 13:36:21

22 Q All right. So it includes all of Warren 13:36:25

23 County. 13:36:34

24 And this Cincinnati portion of the 13:36:34

25 district which you keep whole, would you say 13:36:36

1 that's a more Democratic or a more Republican 13:36:38  
2 section of the district? 13:36:42

3 A You know, I -- I remember -- I don't know 13:36:44  
4 if it was you and I who had this discussion in the 13:36:49  
5 legislative deposition. I think what I said was 13:36:53  
6 that I -- I'm not an expert in the geography or 13:36:56  
7 the political leanings of any -- every particular 13:37:01  
8 subdivision and that I would prefer to have, you 13:37:04  
9 know, my computer available with me to aid me in 13:37:06  
10 that. 13:37:09

11 But I would generally say, while there are 13:37:09  
12 parts of it that lean Republican and parts of it 13:37:13  
13 that lean Democrat, it's generally more 13:37:17  
14 Democrat-leaning. 13:37:23

15 Q Okay. And what about the -- what about 13:37:23  
16 Warren County; does it lean more Republican or 13:37:24  
17 does it lean more Democrat? 13:37:26

18 A For any jurisdiction I'm going to have the 13:37:28  
19 same answer. For Warren County, I'd love to check 13:37:30  
20 just to verify since I'm saying this under oath 13:37:30  
21 and under deposition, but I think Warren County 13:37:35  
22 generally leans Republican. 13:37:37

23 Q Okay. And do you know -- do you know who 13:38:00  
24 the incumbent was who represented the 1st District 13:38:04  
25 for the last ten years -- or, rather -- strike 13:38:13

1 that. 13:38:13

2 Do you know the incumbent who currently 13:38:17

3 represents the 1st District? Do you know who that 13:38:20

4 is? 13:38:26

5 A The incumbent who currently resides in the 13:38:26

6 1st District? There are two. I just want to -- 13:38:28

7 Q No. So -- 13:38:31

8 A -- clarify which one you're talking about. 13:38:31

9 Q So I'm not asking who resides there, but 13:38:32

10 who represents. 13:38:35

11 A Oh, yes, I do know. Yeah. 13:38:36

12 Q All right. Who is that? 13:38:38

13 A It's Steve Chabot. 13:38:39

14 Q Okay. And is it your -- strike that. 13:38:42

15 At the time you drew this map, was it your 13:38:50

16 understanding that Representative Chabot would 13:38:52

17 seek re-election in the 1st District? 13:38:55

18 A I did not know. 13:38:57

19 Q Okay. Did you have any reason to believe 13:39:01

20 he would not seek re-election in this district? 13:39:02

21 A I had no indication one way or the other. 13:39:05

22 Q Okay. And are there any other incumbents 13:39:12

23 who live in this district as well, as drawn? 13:39:14

24 A Yes. 13:39:17

25 Q Okay. And who is that? 13:39:21

1	A Also a resident of Cincinnati is	13:39:28
2	Congressman Wenstrup.	13:39:31
3	Q Is it your understanding at the time you	13:39:33
4	drew the map that Wenstrup would seek election in	13:39:34
5	District 1?	13:39:38
6	A I didn't -- I had no indication one way or	13:39:39
7	the other.	13:39:42
8	Q Okay. At this moment sitting here, do you	13:39:43
9	have any reason to believe he won't seek	13:39:48
10	re-election in District 1?	13:39:50
11	A I have no idea what he intends to do, run,	13:39:51
12	not run, move, not move.	13:39:56
13	Q Okay. Do you know what district	13:39:58
14	Representative Wenstrup currently represents?	13:40:00
15	A I believe it's the 2nd District. I don't	13:40:03
16	have the current congressional map in front of me,	13:40:08
17	but I believe it's the 2nd.	13:40:11
18	Q Okay. And the 1st District, under the	13:40:13
19	partisan indices you looked at, any one of them,	13:40:46
20	were there any where it is less than 50 percent	13:40:50
21	Republican?	13:40:55
22	A I can speak off the top of my head to the	13:41:06
23	federal election analysis that we've talked about	13:41:09
24	where it's an extremely competitive district. I	13:41:11
25	also know from our previous conversations that one	13:41:15

1 of the reasons -- that this is a competitive 13:41:19  
2 district. I'm pretty sure that President Biden 13:41:21  
3 won this district. 13:41:24  
4 And so, yeah, I guess if you looked at it 13:41:25  
5 under the Presidential analysis only, you would 13:41:29  
6 get a sub 50 district. 13:41:34  
7 Q Right. But just to -- talking about 13:41:35  
8 indexes, is it your understanding that this is 13:41:38  
9 greater than 50 percent Republican under the 13:41:41  
10 federal index? 13:41:43  
11 A Well, like I said -- I thought you said 13:41:46  
12 under any indexes am I aware of it being under -- 13:41:49  
13 Q Right -- 13:41:51  
14 A -- 50. 13:41:53  
15 Q -- right, right. I'm just -- 13:41:53  
16 A As I said, under -- under the federal 13:41:53  
17 index, it's 51.5, extremely competitive, 13:41:54  
18 hypercompetitive, I think is what some people 13:41:58  
19 testified about before the -- 13:42:01  
20 Q Right. 13:42:02  
21 A -- committees. 13:42:03  
22 And under the Trump index, it's -- Trump 13:42:04  
23 index, it's a Biden-favoring I think 50.6. And 13:42:09  
24 under the other one, it's -- I think when you and 13:42:15  
25 I went through that list, it's like -- this is the 13:42:19

1 one that's, like, 51.49962. 13:42:22

2 Q Right. Okay. 13:42:26

3 MR. KLEIN: So let's pull up Tab 8. 13:42:34

4 (WHEREUPON, DiRossi Exhibit No. 9 was 13:42:34

5 presented to the witness.) 13:42:56

6 BY MR. KLEIN: 13:42:56

7 Q So I'm representing, again, this is a 13:42:57

8 screenshot from Maptitude of when we -- of -- 13:43:01

9 of -- from when we loaded up the enacted plan to 13:43:07

10 Maptitude. And we've also put subdivision borders 13:43:11

11 on top as well for -- for municipal corporations. 13:43:16

12 So let's look over on the screen. Do you 13:43:26

13 see where North College Hill is? 13:43:32

14 A No. 13:43:36

15 Q Okay. It's -- so if you -- maybe I can 13:43:44

16 take -- yeah, all right. So -- 13:43:48

17 A Oh, I see your thing. 13:43:49

18 This is a -- I would just point out here, 13:43:52

19 you said that you put up the names of the 13:43:54

20 political subdivisions; is that what you said are 13:43:57

21 on the screen? 13:44:00

22 Q Correct. 13:44:01

23 A These -- I do not recognize a lot of 13:44:02

24 these. I mean, again, the constitution talks 13:44:04

25 about counties obviously -- 13:44:07

1 Q Right. 13:44:10

2 A -- municipal corporations, which are 13:44:10

3 incorporated cities or unincorporated villages, 13:44:13

4 and then townships. And I do see a number of 13:44:17

5 names of cities, villages, townships that I 13:44:22

6 recognize, but I don't recognize a lot of -- I 13:44:25

7 mean, I don't recognize a lot of these names. 13:44:30

8 Like, I don't know what Dunlap, Dry Ridge, 13:44:34

9 Taylor Creek, White Oak, Dent, Monfort Heights, 13:44:38

10 Bridgetown -- I don't recognize those. Those do 13:44:42

11 not look like the names of political subdivisions. 13:44:44

12 Q What about Forest Park? 13:44:46

13 A I do see Forest Park, and I do recognize 13:44:48

14 that, yes -- 13:44:54

15 Q Would you be -- 13:44:55

16 A -- the name of it. 13:44:56

17 Q Would you be in a position to tell us if 13:44:57

18 Forest Park is more of a rural suburban or -- 13:44:59

19 rural suburban or -- or urban city? 13:45:03

20 A I mean, everybody has their own definition 13:45:13

21 of urban, rural, exurb, and outer suburban -- you 13:45:16

22 know, I -- no. 13:45:23

23 Q Okay. So you would not be in a position. 13:45:25

24 What about a -- what about Finneytown; any 13:45:29

25 ability to tell us if it's more urban, rural, 13:45:40

1 suburban? 13:45:43

2 A Can you point your cursor to that one on 13:45:43

3 the map for me? 13:45:46

4 Q They're a -- yeah, if you can just -- it's 13:45:47

5 just north of the 1st District border right there. 13:45:49

6 A Yeah, I'll be honest with you, I would 13:45:55

7 have said that was Springfield Township, but -- 13:45:57

8 Q Okay. 13:46:00

9 A -- I have no idea what Finneytown is. 13:46:01

10 Q All right. 13:46:01

11 A It's not a political subdivision. 13:46:05

12 Q Right. Okay. Okay. 13:46:07

13 MR. KLEIN: All right. Why don't we -- 13:46:16

14 why don't we pull back up the previous exhibit. 13:46:17

15 (Exhibit shared.) 13:46:32

16 BY MR. KLEIN: 13:46:32

17 Q So looking to District 8, would you say 13:46:32

18 that that's a district that leans for Democratic 13:46:35

19 or it leans more Republican? 13:46:39

20 A District 8, you said? 13:46:40

21 Q That's right. 13:46:41

22 A Yeah, it leans Republican. 13:46:42

23 Q Okay. And looking at -- looking at -- and 13:46:45

24 looking at District 2, would you say that's more 13:47:01

25 of a Democratic-leaning county or a -- or, 13:47:03

1 rather -- sorry. We can -- we can -- strike that. 13:47:05  
2 Looking at District 2, would you say 13:47:15  
3 that's a more Democratic or -- would you say 13:47:17  
4 that's more of a Democratic-leaning district or a 13:47:21  
5 Republican-leaning district? 13:47:24  
6 A Yeah, the -- District 2 and 8 both would 13:47:26  
7 be Republican-leaning districts, and then the -- 13:47:33  
8 maybe to help you out, District 1, 10, and 15 are 13:47:35  
9 all three of the competitive districts that I 13:47:39  
10 referred to earlier. 13:47:41  
11 Q Right. And that would be competitive 13:47:42  
12 under this 4654 definition, correct? 13:47:45  
13 A Yes. 13:47:51  
14 Q And that would be looking to the federal 13:47:52  
15 partisan index, that six-year lookback we've been 13:47:56  
16 talking about, correct? 13:47:59  
17 A Well, the -- hold on. The federal -- the 13:47:59  
18 federal is a ten-year lookback. The EA -- 13:48:04  
19 Q Right, right, right. 13:48:08  
20 A -- (indiscernible) -- 13:48:09  
21 Q Sorry. 13:48:09  
22 A -- six-year. 13:48:09  
23 Q Correct. Sorry. 13:48:11  
24 A Can you rephrase that or reask that? 13:48:12  
25 Q Right. So they would be competitive using 13:48:14

1 that plus or minus 4 definition of competitive 13:48:16

2 looking to that federal ten-year lookback? 13:48:19

3 Thank you for clarifying. 13:48:22

4 A Yes, but I think all of them, if not two 13:48:24

5 of the three of them for sure, would be also 13:48:27

6 competitive under the other silo of the six-year 13:48:29

7 lookback of state and federal. 13:48:35

8 I mean, they're -- they're competitive 13:48:36

9 districts. I'm not sure -- they're going to be 13:48:38

10 competitive however you look at them. 13:48:41

11 Q Okay. 13:48:42

12 MR. KLEIN: I think that's all for me. I 13:48:54

13 think I can yield to Brady at that point. 13:48:56

14 Thank you. 13:48:59

15 MS. BENDER: Okay. I have no further 13:49:04

16 questions, but I would like to simply say, we 13:49:05

17 disagree with the indications of attorney-client 13:49:07

18 work product and legislative privilege throughout 13:49:12

19 this deposition, and we believe that those 13:49:14

20 objections materially impeded discovery that we're 13:49:18

21 entitled to. 13:49:21

22 So I wanted to give you an opportunity to 13:49:21

23 withdraw the objections regarding legislative 13:49:23

24 privilege and attorney-client privilege. 13:49:26

25 Will you withdraw those at this time, or 13:49:29

1 are you standing on them such that we're at an 13:49:31  
2 impasse? 13:49:35

3 MR. McGUIRE: Well, I don't know if it's 13:49:35  
4 an impasse or not. I've asserted the objections, 13:49:37  
5 and I'm not withdrawing them. 13:49:39

6 MS. BENDER: Okay. Our understanding 13:49:41  
7 of -- if they're not being withdrawn, then we see 13:49:43  
8 this as an impasse. And for that reason, we'd 13:49:45  
9 like to leave the deposition open and reserve the 13:49:49  
10 right to seek relief from the Court on this point. 13:49:52

11 MR. McGUIRE: I guess you can say anything 13:49:57  
12 you'd like on the record. I consider the 13:49:59  
13 deposition concluded, but sure. 13:50:01

14 MS. BENDER: Okay. That's all for me. 13:50:06

15 Thank you, Mr. Springhetti -- or thank 13:50:09  
16 you, Mr. DiRossi. Excuse me. 13:50:10

17 THE VIDEOGRAPHER: The time is 1:50. We 13:50:13  
18 are off the record. 13:50:16

19 (WHEREUPON, the deposition was concluded 13:50:16  
20 at 1:50 p.m. CST) 13:52:37

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ACKNOWLEDGMENT OF DEPONENT

I, RAYMOND DiROSSI, do hereby acknowledge  
that I have read and examined the foregoing  
testimony and the same is a true, correct, and  
complete transcription of the testimony given by  
me and any corrections appear on the attached  
errata sheet signed by me.

\_\_\_\_\_

(SIGNATURE)

\_\_\_\_\_

(DATE)

1           C E R T I F I C A T E   O F   R E P O R T E R

2  
3           I, MICHELLE M. YOHLER, a Certified  
4 Shorthand Reporter within and for the County of  
5 Will, State of Illinois, do hereby certify:

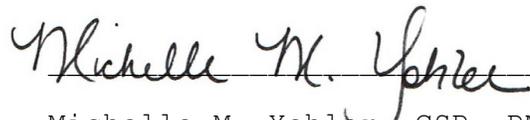
6           That previous to the commencement of the  
7 examination of the witness, the witness was duly  
8 sworn to testify the whole truth concerning the  
9 matters herein;

10          That the foregoing deposition transcript  
11 was reported stenographically by me, was  
12 thereafter reduced to typewriting under my  
13 personal direction and constitutes a true record  
14 of the testimony given and the proceedings had;

15          That the said deposition was taken  
16 remotely before me at the time and place  
17 specified;

18          That I am not a relative or employee or  
19 attorney or counsel, nor a relative or employee of  
20 such attorney or counsel for any of the parties  
21 hereto, nor interested directly or indirectly in  
22 the outcome of this action.

1           IN WITNESS WHEREOF, I do hereunto set my  
2 hand and affix my seal of office at Chicago,  
3 Illinois, this 8th day of December, 2021.  
4  
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8             
9           Michelle M. Yohler, CSR, RMR, CRR  
10           Certified Shorthand Reporter  
11           CSR No.: 84-4531  
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Transcript of Raymond DiRossi  
 Conducted on December 7, 2021

<p><b>57.8</b>                  103:22, 105:5,                  106:3  <b>57.88</b>                  104:22  <b>57.88085</b>                  99:17  <b>58.8</b>                  110:5, 110:9  <b>59</b>                  146:5</p>	<p><b>7th</b>                  7:8</p> <hr/> <p><b>8</b></p> <hr/> <p><b>8</b>                  1:15, 7:10,                  14:18, 14:22  <b>8-and-a-half-by</b>                  152:3  <b>84</b>                  2:4, 231:11  <b>850</b>                  3:8  <b>88</b>                  69:3  <b>89</b>                  6:13  <b>8th</b>                  231:3</p>	
<hr/> <p style="text-align: center;"><b>6</b></p>	<hr/> <p style="text-align: center;"><b>9</b></p>	
<p><b>60.8</b>                  110:5, 110:8  <b>600</b>                  4:8  <b>61.3</b>                  110:23  <b>614.466</b>                  5:10  <b>62</b>                  109:2, 109:4  <b>62.4</b>                  109:2  <b>62.46</b>                  109:3  <b>63.07</b>                  110:24, 111:1  <b>63.1</b>                  110:24  <b>65.1</b>                  109:6, 109:8  <b>66</b>                  108:1  <b>66.7</b>                  109:6, 109:7  <b>67</b>                  108:1</p>	<p><b>9</b>                  77:18, 77:21  <b>919.329</b>                  4:22  <b>94105</b>                  3:17  <b>99</b>                  74:8, 197:23  <b>9th</b>                  141:20, 144:12,                  209:18, 210:1</p>	
<hr/> <p style="text-align: center;"><b>7</b></p>		
<p><b>700</b>                  4:8  <b>78</b>                  6:12  <b>786,630</b>                  74:21  <b>786630</b>                  98:4</p>		

## 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 this appendix to be served by email upon the counsel listed below:

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**IN THE SUPREME COURT OF OHIO**

---

**Regina C. Adams, *et al.*,**

***Relators,***

**v.**

**Governor Mike De Wine, *et al.*,**

***Respondents.***

---

**Case No. 2021-1428**

**Original Action Filed Pursuant to  
Ohio Const., Art. XIX, Sec. 3(A)**

**League of Women Voters of Ohio, *et al.*,**

***Relators,***

**v.**

**Governor Mike De Wine, *et al.*,**

***Respondents.***

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**Case No. 2021-1449**

**Original Action Filed Pursuant to  
Ohio Const., Art. XIX, Sec. 3(A)**

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**AFFIDAVIT OF FREDA LEVENSON  
EXHIBITS APPENDIX A - DEPOSITIONS  
Volume 2 of 2**

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**EXHIBITS APPENDIX A - DEPOSITIONS**  
**Volume 2 of 2**

**Index of Documents**

<b><u>ITEM</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>BATES RANGE</u></b>
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4	Exhibit 3 to Deposition of Ray DiRossi	DEPO CONG 0298
5	Exhibit 4 to Deposition of Ray DiRossi	DEPO CONG 0299
6	Exhibit 5 to Deposition of Ray DiRossi	DEPO CONG 0300 - 308
7	Exhibit 6 to Deposition of Ray DiRossi	DEPO CONG 0309 - 311
8	Exhibit 7 to Deposition of Ray DiRossi	DEPO CONG 0312 - 313
9	Exhibit 8 to Deposition of Ray DiRossi	DEPO CONG 0314 - 318
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11	Exhibit 10 to Deposition of Ray DiRossi	DEPO CONG 0320
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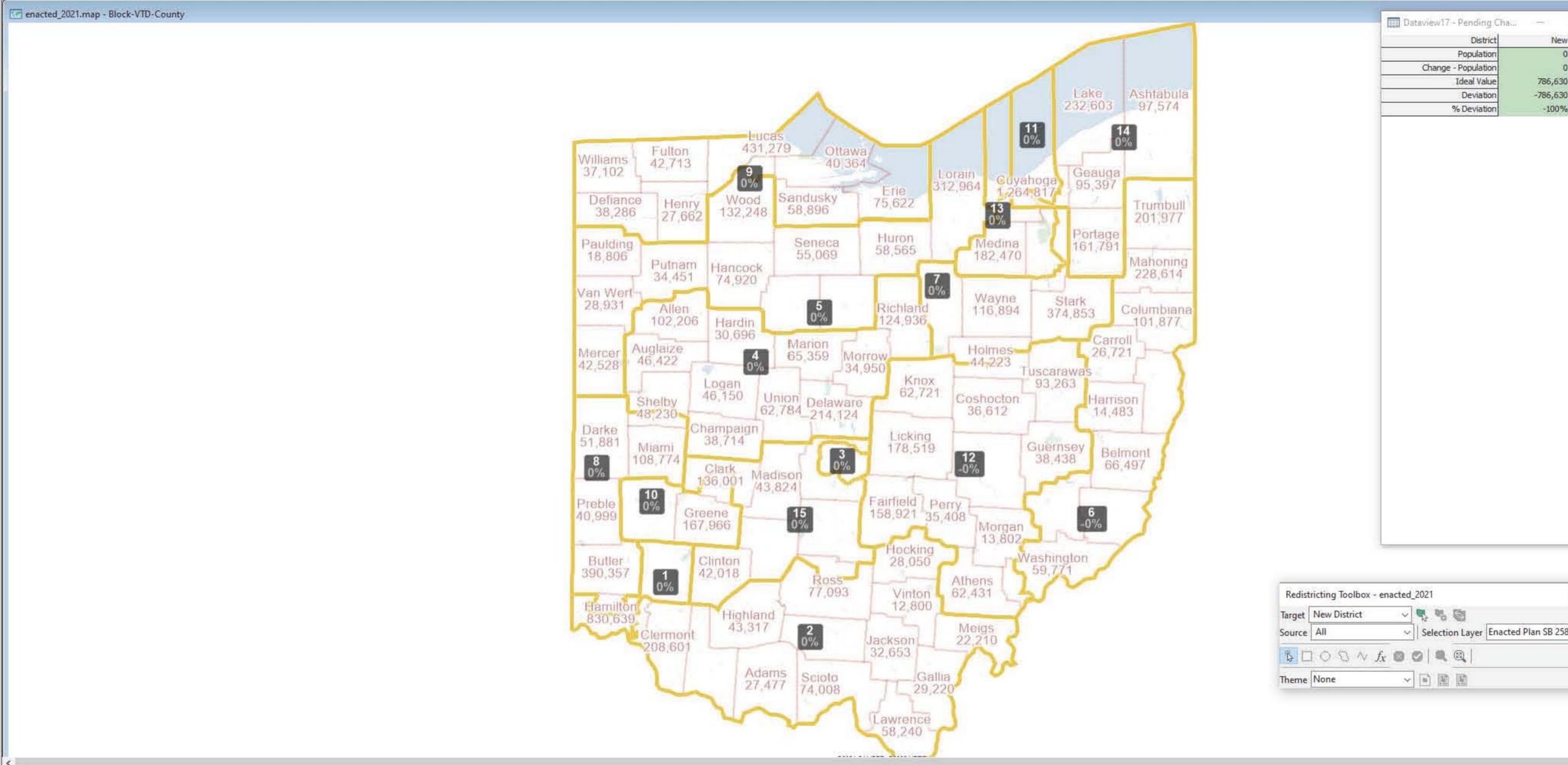


Display Manager

- TIGER/Line Segment
- Landmark Area
- US Landmark Area
- Water Area
- US Street
- Streets
- River
- Census Block
- Railroad
- Voting District
- City/Town
- County
- US Landmark
- Districts
- Enacted Plan SB 258 Final

Dataview18 - Enacted Plan SB 258 Final SHP

G14T_RV	G14T_TV	G14J_DV	G14J_RV	G14J_TV	G16P_DV	G16P_RV	G16P_TV	G16S_DV	G16S_RV	G16S_TV	G18S_DV	G18S_RV	G18S_TV	G18G_DV	G18G_RV	G18G_TV	G18A_DV	G18A_RV	G18A_TV	G18I_DV	G18I_RV	G18I_TV	G18T_DV	G18T_RV	G18T_TV	G18J_DV	G18J_RV	G18J_TV	G18V_DV	G18V_RV	G18V_TV	EA51_DV	EA51_RV	EA51_TV	EA52_DV	EA52_RV	EA52_TV	POPULATION	DEVIATION	F_DEVIATIO	DISTRICT_N	EA53	F_G20P_RV	F
11823.700	14612.900	1132.610	4990.100	16122.800	10772.500	18984.300	16926.500	18161.500	1972.800	10463.700	13789.800	13159.000	16948.800	16080.000	12038.600	17804.200	18473.900	13870.600	12344.600	12793.300	17548.000	12109.000	13901.600	13815.800	14523.700	13844.100	17582.100	1426.300	13773.600	16810.000	10583.600	15641.300	17349.100	12990.500	786630	0.0000	0.0000	7	57,8809	0.5844				
11673.900	17887.700	16778.620	11632.200	18410.800	17284.900	16954.300	1016.500	16363.270	14888.400	17527.500	10950.900	19908.000	10859.000	19841.960	13659.500	12383.600	17269.860	11797.600	19067.400	16162.910	10781.100	17513.000	10776.910	13772.700	18494.800	15818.930	10159.200	15978.100	13118.600	12102.900	15221.600	15539.300	12069.800	17609.100	786630	0.0000	0.0000	4	67,2917	0.6599				
10866.500	16483.300	11921.700	16644.500	18566.300	17871.000	19501.600	1979.700	16293.000	19747.700	14554.600	17334.600	10761.100	18095.800	13835.700	15907.800	10285.300	16120.100	19472.700	15592.900	15156.500	14586.400	12485.700	10661.700	15178.500	13962.200	17995.600	14059.700	12055.300	16805.900	12824.100	19630.100	15214.300	17967.400	13181.800	786630	0.0000	0.0000	9	50,3142	0.5138				
18774.300	19810.800	10113.200	10626.000	11639.200	14398.500	11653.300	12817.700	16492.100	13438.900	15428.300	14608.800	14689.700	19298.600	17957.400	1084.000	10687.700	12530.900	13833.600	16364.500	10172.500	10619.000	15296.700	19199.700	10984.900	17641.000	15644.900	19082.200	14727.200	13550.400	14435.900	17986.400	19849.200	12371.000	12220.200	786630	0.0000	0.0000	1	51,5499	0.4837				
15059.100	19193.800	15946.520	14616.900	10563.500	18996.000	12782.200	17163.000	11410.200	15164.600	1478.900	15983.100	14031.500	10014.600	18593.500	12997.200	10539.600	11022.700	13874.200	14896.900	12322.500	12692.100	17453.300	19979.400	1682.200	18682.500	18363.300	17436.300	16799.700	13466.000	18531.300	11997.300	16569.500	18275.300	14844.800	786630	0.0000	0.0000	8	62,4661	0.6067				
17456.500	15265.400	17001.300	10165.000	17166.300	18026.100	11685.900	15079.500	13350.750	13028.600	11169.300	15918.600	17371.700	109635.800	18093.540	15083.200	11659.200	19059.970	18251.300	17311.300	14488.480	19686.800	16098.000	18017.870	12049.600	17140.200	16599.130	18426.200	15025.300	16463.000	17822.600	14285.700	13931.000	12812.500	16743.600	786630	0.0000	0.0000	2	66,6999	0.6726				
11985.900	18078.300	14490.660	17078.000	11568.700	19645.800	14175.000	10718.300	19873.600	19281.000	19873.700	14835.500	15710.200	10545.700	11506.200	10007.900	11617.400	17549.800	19309.800	16859.600	16894.200	1262.800	1855.100	14608.900	14572.700	16458.800	18272.700	14180.500	12453.300	12559.900	13625.700	16185.600	16073.600	11922.600	17996.200	786630	0.0000	0.0000	14	54,1365	0.5501				
7852.600	14581.500	17094.900	17837.780	14932.600	15156.500	14300.150	15310.500	16918.200	16643.500	17747.300	16092.600	12203.200	18295.800	12811.500	10430.860	19826.200	17481.100	18643.840	16124.900	17994.000	15410.950	13312.900	18206.200	11017.000	14980.600	15258.800	17547.840	12806.600	16715.000	10841.700	17556.800	15591.800	19388.170	14980.000	786630	0.0000	0.0000	3	29,6636	0.2641				
14068.700	12269.300	11159.900	13326.700	14486.700	16138.500	18276.400	19104.000	17938.900	12792.500	10570.800	13735.900	13043.500	16779.400	11878.300	16789.400	17109.400	11958.500	10276.500	12235.100	10214.900	18456.600	19778.200	17304.400	17940.900	12183.300	11407.500	17358.100	18765.600	10707.800	17933.100	18641.000	10303.300	11160.600	11463.900	786629	-1.0000	-0.0000	6	56,2949	0.6101				
16289.700	15910.000	12467.040	14167.200	16634.300	14616.600	18349.100	19249.600	17853.400	12314.400	14552.100	18400.700	12055.600	10456.300	12843.500	12532.000	12411.800	17314.800	11625.900	18940.700	18561.900	17227.600	16052.900	17692.100	13140.200	17166.700	14930.900	10070.600	15001.500	14627.500	18423.300	13050.800	11159.200	15011.900	16171.100	786630	0.0000	0.0000	15	53,8865	0.5210				
11083.100	10461.900	15890.060	16476.500	12366.600	19048.400	15981.200	14118.900	19049.600	18439.400	16692.000	17702.100	19785.400	17487.500	13264.400	16653.000	19427.700	14694.200	17093.900	11788.100	17626.400	13093.800	12520.900	12698.900	13721.500	13803.500	19630.500	12510.100	12140.700	13773.900	19814.400	13588.400	12940.100	12594.800	15535.000	786630	0.0000	0.0000	5	60,7897	0.6185				
12065.700	14073.200	13193.140	10635.300	13828.400	16475.200	19174.100	103016.200	12944.100	19731.300	18765.600	10171.300	19817.700	19989.100	16342.000	15562.000	11141.900	19754.100	17426.200	17180.400	12737.400	10068.500	15689.800	19027.300	1415.700	17608.800	18043.400	17921.500	15964.900	14180.500	12243.400	16423.900	19145.400	12184.600	11330.000	786630	0.0000	0.0000	10	53,3209	0.5091				
11137.000	18721.300	19250.450	11897.600	11148.100	12679.600	14985.200	13513.500	18045.600	1050.700	12802.300	19824.500	16118.700	15943.200	10414.300	17623.300	16501.600	14015.600	15497.700	19513.300	14509.300	10453.700	17713.200	17736.600	16899.800	11611.400	14797.500	12691.800	17489.300	18610.400	10816.600	19427.000	13959.600	17825.600	11785.200	786630	0.0000	0.0000	13	49,2329	0.4903				
19377.200	16675.900	16825.350	10958.600	17783.900	14774.600	19001.700	10467.600	10495.900	17827.200	15648.500	13373.400	16245.900	19619.300	14040.900	18039.100	10717.000	12245.400	13223.400	15468.900	12270.900	16264.200	17621.000	13002.500	17175.100	16920.700	12533.500	12216.100	14749.600	14360.600	18226.800	12587.500	11398.300	13898.900	15297.200	786629	-1.0000	-0.0000	12	63,0713	0.6532				
19615.270	11376.000	18557.600	12211.720	10769.300	13276.700	14674.500	18107.300	19508.100	15546.020	11800.500	14962.500	16011.700	10974.200	11782.200	14091.870	12233.700	16466.400	11867.380	18333.800	15657.900	18178.830	14321.100	11634.600	10557.280	17582.500	10311.100	15819.610	16130.800	16124.300	14076.350	10200.700	19012.200	18532.890	17545.100	786630	0.0000	0.0000	11	19,7950	0.2030				



Dataview17 - Pending Cha...

District	New
Population	0
Change - Population	0
Ideal Value	786,630
Deviation	-786,630
% Deviation	-100%

Redistricting Toolbox - enacted\_2021

Target: New District

Source: All

Selection Layer: Enacted Plan SB 258 F

Theme: None

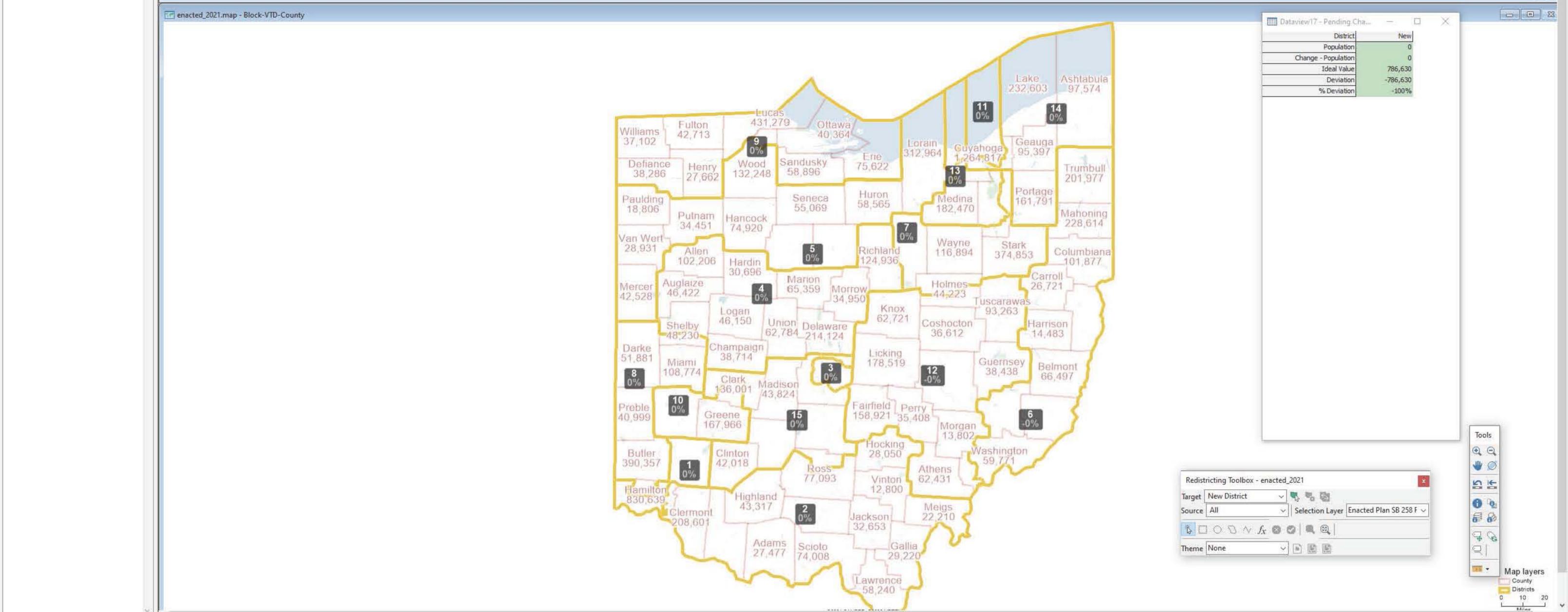
Tools

Map layers

- County
- Districts

0 10 20 Miles

G18A_DV	G18A_RV	G18A_TV	G18I_DV	G18I_RV	G18I_TV	G18T_DV	G18T_RV	G18T_TV	G18J_DV	G18J_RV	G18J_TV	EA51_DV	EA51_RV	EA51_TV	EA52_DV	EA52_RV	EA52_TV	POPULATION	DEVIATION	F_DEVIATIO	DISTRICT_N	EA53	F_G20P_RV	F_EA51_RV	F_EA52_RV	IDEAL_VALU	F_POPULATI	F20PRES_RD	FEDEA	FEDEA_RDI	MULTIPLE_F	DISTRICT_L
8473.900	3870.600	2344.600	2793.300	7548.000	12109.000	13901.600	3815.800	44523.700	3844.100	7582.100	1426.300	13773.600	16810.000	10583.600	15641.300	17349.100	12990.500	786630	0.0000	0.0000	7	57.8809	0.5844	0.5899	0.5626	786630.0000	1.0000	59.3000	56.7000	54.8000	7 0	7 0%
17269.860	11797.600	19067.400	16162.910	10781.100	17513.000	17676.910	13772.700	18494.800	15818.930	10159.200	15978.100	13118.600	12102.900	15221.600	15539.300	12069.800	17609.100	786630	0.0000	0.0000	4	67.2917	0.6599	0.6816	0.6578	786630.0000	1.0000	67.0000	66.0000	64.0000	4 0	4 0%
16120.100	19472.700	15592.900	15156.500	14586.400	12485.700	10661.700	15178.500	13962.200	17995.600	14059.700	12055.300	16805.900	72824.100	19630.100	15214.300	17967.400	13181.800	786630	0.0000	0.0000	9	50.3142	0.5138	0.5089	0.4888	786630.0000	1.0000	52.3000	47.7000	46.1000	9 0	9 0%
12530.900	13833.600	16364.500	10172.500	10619.000	15296.700	19199.700	10984.900	17641.000	15644.900	19082.200	14727.200	13550.400	14435.900	17986.400	19849.200	72371.000	12220.200	786630	0.0000	0.0000	1	51.5499	0.4837	0.5431	0.5037	786630.0000	1.0000	49.1000	51.5000	50.1000	1 0	1 0%
11022.700	13874.200	14896.900	12322.500	12692.100	17453.300	19979.400	1682.200	18682.500	18363.400	78436.300	16799.700	13466.000	18531.300	11997.300	16569.500	18275.300	14844.800	786630	0.0000	0.0000	8	62.4661	0.6067	0.6390	0.6104	786630.0000	1.0000	61.6000	62.0000	60.3000	8 0	8 0%
19059.970	18251.300	17311.300	14488.480	19686.800	16098.000	18017.870	12049.600	17140.200	16599.130	18426.200	15025.300	16463.000	17822.600	14285.700	13931.000	12812.500	16743.600	786630	0.0000	0.0000	2	66.6999	0.6726	0.6617	0.6513	786630.0000	1.0000	68.2000	65.1000	63.3000	2 0	2 0%
17549.800	19309.800	16859.600	16894.200	11262.800	11855.100	14608.900	14572.700	16458.800	18272.700	14180.500	12453.300	12559.900	13625.700	16185.600	16073.600	11922.600	17996.200	786630	0.0000	0.0000	14	54.1365	0.5501	0.5561	0.5228	786630.0000	1.0000	55.7000	53.2000	51.6000	14 0	14 0%
17481.100	18643.840	16124.900	17994.000	15410.950	13312.900	18206.200	11017.000	14980.600	15258.800	17547.840	12806.600	16715.000	10841.700	17556.800	15591.800	19388.170	14980.000	786630	0.0000	0.0000	3	29.6636	0.2641	0.3384	0.2838	786630.0000	1.0000	26.8000	30.4000	29.6000	3 0	3 0%
11958.500	10276.500	12235.100	10214.900	18456.600	19778.200	17304.400	17940.900	12183.300	11407.500	17358.100	18765.600	10707.800	17933.100	18641.000	10303.300	11160.600	11463.900	786629	-1.0000	-0.0000	6	56.2949	0.6101	0.5390	0.5465	786630.0000	1.0000	61.8000	52.9000	51.3000	6 -1	6 -0%
17314.800	1625.900	18940.700	18561.900	17227.600	16052.900	17692.100	13140.200	77166.700	14930.900	10070.600	75001.500	14627.500	18423.300	13050.800	11159.200	150111.900	16171.100	786630	0.0000	0.0000	15	53.8865	0.5210	0.5657	0.5219	786630.0000	1.0000	52.9000	53.7000	52.2000	15 0	15 0%
14694.200	17093.900	11788.100	17626.400	13093.800	12520.900	12698.900	13721.500	13803.500	19630.500	72510.100	12140.700	13773.900	19814.400	13588.400	12940.100	12594.800	15535.000	786630	0.0000	0.0000	5	60.7897	0.6185	0.6107	0.5916	786630.0000	1.0000	62.8000	58.8000	56.9000	5 0	5 0%
19754.100	17426.200	17180.400	12737.400	10068.500	15689.800	19027.300	11415.700	17608.900	18043.400	17921.500	15964.900	14180.500	12243.400	16423.900	19145.400	12184.600	11330.000	786630	0.0000	0.0000	10	53.3209	0.5091	0.5549	0.5197	786630.0000	1.0000	51.8000	52.2000	50.8000	10 0	10 0%
14015.600	15497.700	19513.300	14509.300	10453.700	17713.200	17736.600	16899.800	11611.400	14797.500	12691.800	17489.300	78610.400	10816.600	19427.000	13959.600	17825.600	11785.200	786630	0.0000	0.0000	13	49.2329	0.4903	0.5165	0.4771	786630.0000	1.0000	49.6000	48.6000	47.2000	13 0	13 0%
12245.400	13223.400	15468.900	12270.900	16264.200	17621.000	13002.500	17175.100	16920.700	12533.500	72216.100	14749.600	14360.600	18226.800	12587.500	11398.300	13898.900	15297.200	786629	-1.0000	-0.0000	12	63.0713	0.6532	0.6261	0.6150	786630.0000	1.0000	66.3000	61.3000	59.3000	12 -1	12 -0%
16466.400	11867.380	18333.800	15657.900	18178.830	14321.100	1634.600	10557.280	7582.500	10311.100	15819.610	76130.800	16124.300	14076.350	10200.700	19012.200	18532.890	17545.100	786630	0.0000	0.0000	11	19.7950	0.2030	0.2313	0.1903	786630.0000	1.0000	20.5000	19.4000	19.0000	11 0	11 0%



District	New
Population	0
Change - Population	0
Ideal Value	786,630
Deviation	-786,630
% Deviation	-100%

Redistricting Toolbox - enacted\_2021

Target: New District

Source: All

Selection Layer: Enacted Plan SB 258 F

Theme: None

Tools

Map layers

- County
- Districts

Scale: 0 10 20 Miles

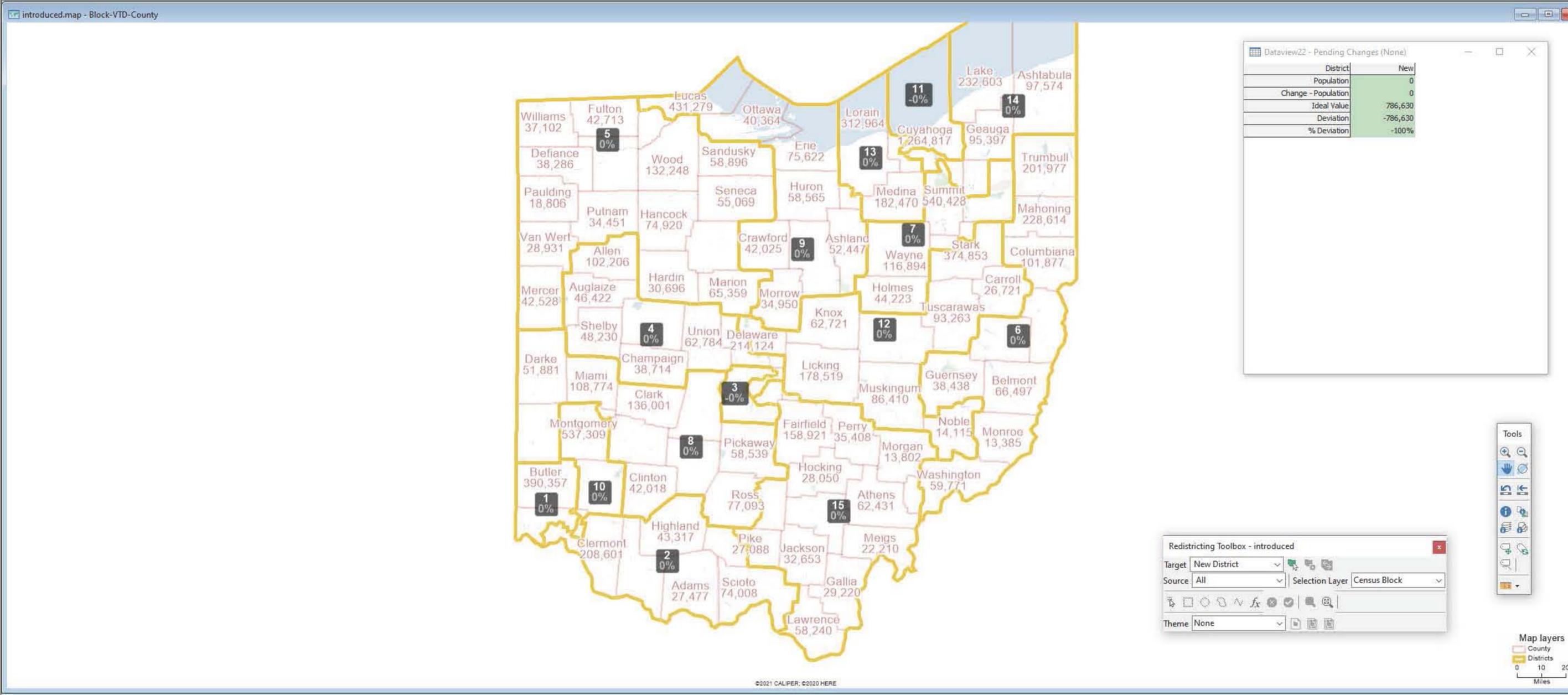


Display Manager

- TIGER/Line Segment
- Landmark Area
- US Landmark Area
- Water Area
- US Street
- Streets
- River
- Census Block
- Railroad
- Voting District
- City/Town
- County
- US Landmark
- Districts
- Enacted Plan SB 258 Intro

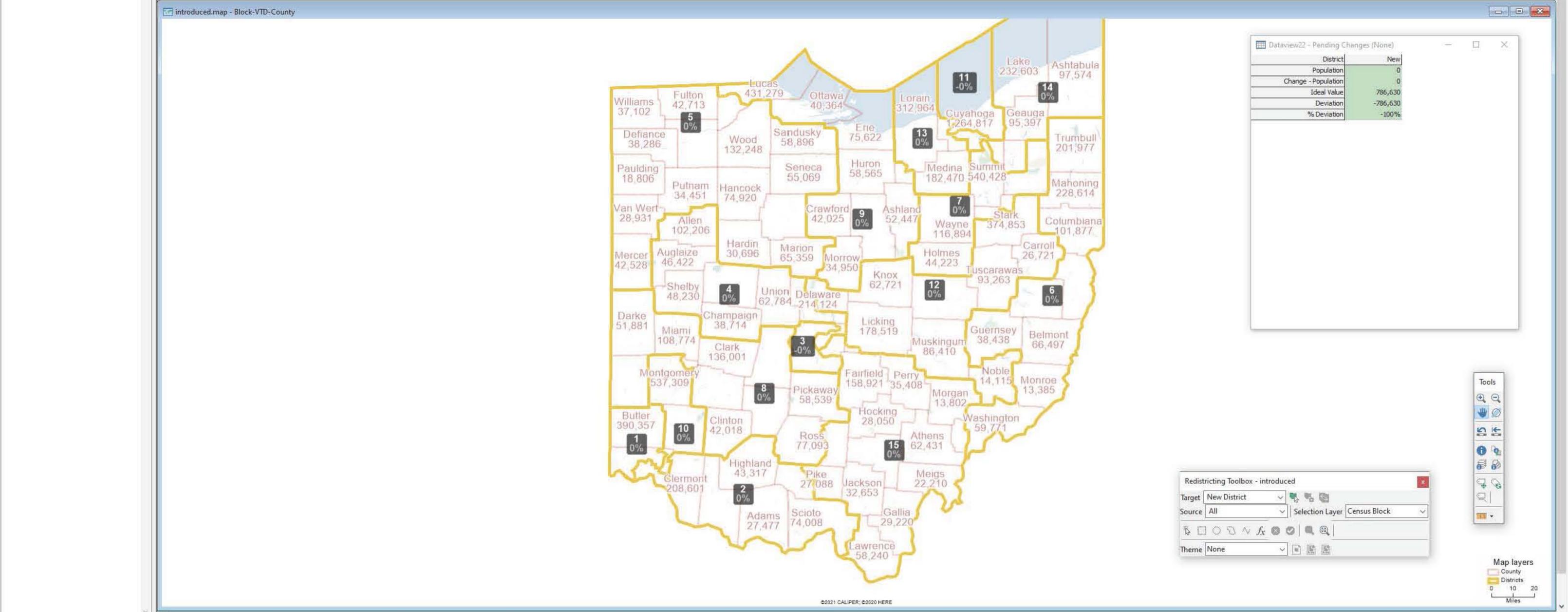
Dataview23 - Enacted Plan SB 258 Introduced

G16S_TV	G18S_DV	G18S_RV	G18S_TV	G18G_DV	G18G_RV	G18G_TV	G18A_DV	G18A_RV	G18A_TV	G18I_DV	G18I_RV	G18I_TV	G18T_DV	G18T_RV	G18T_TV	G18V_DV	G18V_RV	G18V_TV	EA51_DV	EA51_RV	EA51_TV	EA52_DV	EA52_RV	EA52_TV	POPULATION	DEVIATION	F_DEVIATIO	DISTRICT_N	EA53	F_G20P_RV	F_EA51_RV	F_EA52_RV	IDEAL_VALLU	F_POPULATI	F20PRES_RD	FEDEA	FEDEA_RDI
12807.000	17871.700	17787.400	15659.100	12033.100	14374.600	15630.900	13265.100	16482.500	19747.600	17290.900	10397.400	19828.200	18962.700	18063.100	13526.500	18531.200	10661.500	19192.700	19707.000	15864.400	15571.500	1301.800	17622.800	18924.600	786630	0.0000	0.0000	7	52.3045	0.5325	0.5378	0.5096	786630.0000	1.0000	54.0000	51.3000	49.7000
12590.400	18645.100	11694.500	10339.600	10096.800	13674.300	11709.700	16746.800	11960.000	18706.800	14594.800	12122.500	17088.200	16969.600	14523.600	18080.900	14780.300	10636.100	15416.500	12619.700	16434.500	19054.300	18121.900	15150.900	13272.900	786630	0.0000	0.0000	4	53.8378	0.5189	0.5628	0.5255	786630.0000	1.0000	52.7000	53.6000	52.2000
11315.200	12351.400	15656.500	18007.900	12091.900	17374.000	19720.300	14176.600	10952.300	15128.900	15907.500	15131.500	12791.800	10036.600	16814.900	14350.700	18097.200	14215.000	12312.300	13745.500	13647.900	17393.500	1420.100	10082.400	11502.500	786630	0.0000	0.0000	9	52.7830	0.5485	0.5304	0.5139	786630.0000	1.0000	55.8000	50.3000	48.6000
171872.900	11149.200	15517.800	16667.000	14355.900	14609.900	17538.700	18500.200	13924.900	12425.200	17145.000	11469.400	12799.600	16142.400	11773.000	15077.900	12910.600	19631.000	12541.600	17963.000	19260.200	17223.200	14250.400	16411.200	10661.700	786630	0.0000	0.0000	1	59.1114	0.5583	0.6138	0.5766	786630.0000	1.0000	56.7000	59.3000	57.7000
15382.800	16145.000	19148.700	15293.800	12649.390	15016.500	17106.600	14462.580	18617.000	13079.500	10585.250	10878.400	12886.900	13637.260	12465.300	13353.900	13099.490	18544.400	11643.900	10117.400	18415.200	18532.600	10131.800	11258.800	11390.700	786630	0.0000	0.0000	8	67.1746	0.6682	0.6747	0.6573	786630.0000	1.0000	67.9000	65.1000	63.2000
11042.700	13421.800	10893.600	14315.400	18356.000	19083.400	16081.800	11935.500	10911.200	12846.800	11317.900	16020.500	10737.000	18887.700	16627.400	12587.500	16815.400	13408.600	10224.100	17064.300	175048.200	12112.600	17963.000	18805.900	16768.900	786630	0.0000	0.0000	2	51.4388	0.5070	0.5271	0.5013	786630.0000	1.0000	51.5000	50.7000	49.3000
12622.800	16572.200	16824.900	13397.200	12849.300	16722.000	14298.900	18505.000	10697.300	19202.400	18258.400	13010.900	14936.600	14759.000	17145.500	19228.300	19377.800	15843.700	15221.600	13319.100	15803.300	19122.500	17603.900	13244.000	10847.900	786630	0.0000	0.0000	14	54.0798	0.5435	0.5575	0.5223	786630.0000	1.0000	55.1000	53.2000	51.6000
19081.700	11840.100	19769.300	11609.500	17571.600	19404.400	13664.100	19925.500	19903.200	19828.700	1963.400	13619.200	16279.500	10835.200	10746.600	17840.100	16980.900	18387.500	15368.500	15174.700	13638.400	18813.100	17976.500	15786.900	13763.400	786629	-1.0000	-0.0000	3	43.5973	0.3992	0.4830	0.4194	786630.0000	1.0000	40.6000	44.5000	43.2000
19614.300	13600.700	11841.900	15442.700	11677.100	15876.900	15903.700	11864.800	19196.000	1060.800	10101.400	17418.500	18559.900	17198.000	16844.200	10962.000	11371.200	16193.600	17564.900	10699.200	16915.400	17614.600	10328.500	10049.200	10377.800	786630	0.0000	0.0000	6	56.1347	0.6079	0.5377	0.5450	786630.0000	1.0000	61.6000	52.7000	51.2000
16823.700	19041.900	12999.200	12041.100	12106.600	14401.600	13865.500	17595.700	10257.600	17853.300	12467.200	16886.700	18484.300	19647.800	12906.700	18711.000	18807.000	18416.000	17223.100	13621.800	18694.100	12316.000	1428.000	14737.800	16165.800	786630	0.0000	0.0000	15	50.1340	0.5164	0.5076	0.4894	786630.0000	1.0000	52.4000	48.9000	47.5000
17636.100	17194.900	14804.100	11999.000	10443.700	13582.000	14298.700	12153.400	17044.500	19198.000	13679.250	11863.400	17691.400	18759.950	11804.300	18501.900	15894.850	11409.700	17304.600	10251.500	18357.400	18608.900	18076.600	12429.000	10505.600	786630	0.0000	0.0000	5	65.8000	0.6615	0.6551	0.6427	786630.0000	1.0000	67.3000	63.2000	61.0000
17569.800	14427.300	18319.600	12746.900	14125.400	10413.000	13413.300	16604.600	1748.000	18352.600	18552.400	16636.800	18332.200	16012.400	17086.100	10524.600	13786.600	14713.400	18500.100	18716.100	14154.900	12871.100	15758.800	10626.400	16385.300	786630	0.0000	0.0000	10	56.3637	0.5321	0.5902	0.5503	786630.0000	1.0000	54.0000	55.8000	54.4000
173674.900	10225.100	16987.600	17212.800	18478.800	1730.800	18988.000	12091.400	18006.600	10098.100	1954.700	13127.700	18301.300	17647.100	16637.700	11736.800	12179.200	16152.300	18331.600	17812.000	17375.200	15187.600	14163.700	12290.800	16454.500	786630	0.0000	0.0000	13	50.1643	0.5015	0.5261	0.4833	786630.0000	1.0000	50.8000	49.7000	48.3000
16863.800	14595.300	15404.000	19999.300	15280.500	16158.700	10725.800	15756.000	10777.300	16833.400	12176.100	15827.600	17577.500	14601.600	16032.100	17458.100	14832.400	10380.400	15212.800	16702.700	16754.900	13457.600	13721.600	12158.800	15880.500	786630	0.0000	0.0000	12	62.5135	0.6482	0.6200	0.6083	786630.0000	1.0000	65.9000	60.3000	58.2000
12177.100	10602.700	19609.070	10211.700	17169.100	18127.960	11400.300	12374.100	15286.210	17660.300	11569.000	1920.040	13526.300	17252.100	14453.320	16820.600	15987.600	19468.500	15456.100	11323.100	18164.090	19487.200	14081.400	12710.120	16791.600	786629	-1.0000	-0.0000	11	21.1735	0.2171	0.2447	0.2044	786630.0000	1.0000	21.9000	20.7000	20.3000



Dataview23 - Enacted Plan SB 258 Introduced

G18S_RV	G18S_TV	G18G_DV	G18G_RV	G18G_TV	G18A_DV	G18A_RV	G18A_TV	G18I_DV	G18I_RV	G18I_TV	G18T_DV	G18T_RV	G18T_TV	G18I_DV	G18I_RV	G18I_TV	EA51_DV	EA51_RV	EA51_TV	EA52_DV	EA52_RV	EA52_TV	POPULATION	DEVIATION	F_DEVIATIO	DISTRICT_N	EA53	F_G20P_RV	F_EA51_RV	F_EA52_RV	IDEAL_VALLU	F_POPULATI	F20PRES_RD	FEDEA	FEDEA_RD	DISTRICT_L
1778.400	15659.100	12033.100	14374.600	15630.900	13265.100	16482.500	19747.600	17290.900	10397.400	19828.200	18962.700	18063.100	13526.500	18531.200	10661.500	19192.700	19707.000	15864.400	15571.500	11301.800	17622.800	18924.600	786630	0.0000	0.0000	7	52.3045	0.5325	0.5378	0.5096	786630.0000	1.0000	54.0000	51.3000	49.7000	7 0%
11694.500	10339.600	10096.800	13674.300	11709.700	16746.800	11960.000	18706.800	14594.800	12122.500	17088.200	16969.600	14523.600	18080.900	103636.100	15416.500	12619.700	16434.500	19054.300	18121.900	15150.900	13272.900	13272.900	786630	0.0000	0.0000	4	53.8378	0.5189	0.5628	0.5255	786630.0000	1.0000	52.7000	53.6000	52.2000	4 0%
15656.500	78007.900	12091.900	17374.000	9720.300	14176.600	10952.300	15128.900	15907.500	15131.500	12791.800	10036.100	16814.900	14350.700	18097.200	14215.000	12312.300	13745.500	13647.900	17393.500	11420.100	10082.400	11502.500	786630	0.0000	0.0000	9	52.7830	0.5485	0.5304	0.5139	786630.0000	1.0000	55.8000	50.3000	48.6000	9 0%
15517.800	16667.000	14355.900	14609.900	17538.700	18500.200	13924.900	12425.200	17145.000	11469.400	12799.600	16142.400	11773.000	15077.900	12910.600	19631.000	12541.600	17963.000	19260.200	17223.200	144250.400	16411.200	10661.700	786630	0.0000	0.0000	1	59.1114	0.5583	0.6138	0.5766	786630.0000	1.0000	56.7000	59.3000	57.7000	1 0%
19148.700	15293.800	12649.390	15016.500	17106.700	14462.580	18617.000	13079.500	10585.250	10878.400	12886.900	13637.260	12465.300	13353.900	13099.490	18544.400	11643.900	10117.400	18415.200	18532.600	10131.800	11258.800	11390.700	786630	0.0000	0.0000	8	67.1746	0.6682	0.6747	0.6573	786630.0000	1.0000	67.9000	65.1000	63.2000	8 0%
10893.600	14315.400	18356.000	19083.400	16081.800	11935.500	10911.200	12846.800	11317.900	16020.500	10737.000	18887.700	16627.400	12587.500	16815.400	13408.600	10224.100	17064.300	15048.200	12112.600	17963.000	18805.900	16768.900	786630	0.0000	0.0000	2	51.4388	0.5070	0.5271	0.5013	786630.0000	1.0000	51.5000	50.7000	49.3000	2 0%
16824.900	13397.200	12849.300	1672.000	14298.900	18505.000	10697.300	19202.400	18258.400	13010.900	14936.600	14759.000	17145.500	19228.300	19377.800	15843.700	15221.600	13319.100	15803.300	19122.500	17603.900	13244.000	10847.900	786630	0.0000	0.0000	14	54.0798	0.5435	0.5575	0.5223	786630.0000	1.0000	55.1000	53.2000	51.6000	14 0%
19769.300	11609.500	17571.600	19404.400	13664.100	19925.500	19903.200	19828.700	11963.400	13619.200	16279.500	10835.200	10746.600	17840.100	16980.900	18387.500	15368.500	15174.700	13638.400	18813.100	17976.500	15786.900	13763.400	786629	-1.0000	-0.0000	3	43.5973	0.3992	0.4830	0.4194	786630.0000	1.0000	40.6000	44.5000	43.2000	3 -0%
11841.900	15442.700	11677.100	15876.900	19903.700	11864.800	19196.000	11060.800	10101.400	17418.500	18559.900	17198.000	16844.200	10962.000	11371.200	16193.600	17564.900	10699.200	16915.400	17614.600	10328.500	10049.200	10377.800	786630	0.0000	0.0000	6	56.1347	0.6079	0.5377	0.5450	786630.0000	1.0000	61.6000	52.7000	51.2000	6 0%
12999.200	12041.100	12106.600	14401.600	13865.500	17595.700	10257.600	17853.300	12467.200	16886.700	18484.300	19647.800	12906.700	18711.000	18807.000	18416.000	17223.100	13621.800	18694.100	12316.000	1428.000	14737.800	16165.800	786630	0.0000	0.0000	15	50.1340	0.5164	0.5076	0.4894	786630.0000	1.0000	52.4000	48.9000	47.5000	15 0%
14804.100	11999.000	10443.700	13582.000	14298.700	12153.400	17044.500	19198.000	13679.250	11863.400	17691.400	18759.950	11804.300	18501.900	15894.850	11409.700	17304.600	10251.500	18357.400	18608.900	18076.600	12429.000	10505.600	786630	0.0000	0.0000	5	65.8000	0.6615	0.6551	0.6427	786630.0000	1.0000	67.3000	63.2000	61.0000	5 0%
18319.600	12746.900	14125.400	10413.000	13413.300	16604.600	1748.000	18352.600	18552.400	16636.800	18332.200	16012.400	17086.100	10524.600	13786.600	14713.400	18500.100	18716.100	14154.900	12871.100	15758.800	10626.400	16385.300	786630	0.0000	0.0000	10	56.3637	0.5321	0.5902	0.5503	786630.0000	1.0000	54.0000	55.8000	54.4000	10 0%
16987.600	17212.800	18478.800	11730.800	18988.000	12091.400	18006.600	10098.100	11954.700	13127.700	18301.300	17647.100	11736.800	12179.200	16152.300	18331.600	17812.300	17375.200	15187.600	14163.700	12290.800	16454.500	15404.000	786630	0.0000	0.0000	13	50.1643	0.5015	0.5261	0.4833	786630.0000	1.0000	50.8000	49.7000	48.3000	13 0%
15404.000	19999.300	15280.500	16158.700	10725.800	15756.000	1077.300	16833.400	12176.100	15827.600	17577.500	14601.600	16032.100	17458.100	14832.400	10380.400	15212.800	16702.200	16754.900	13457.600	13721.600	12158.800	15880.500	786630	0.0000	0.0000	12	62.5135	0.6482	0.6200	0.6083	786630.0000	1.0000	65.9000	60.3000	58.2000	12 0%
19609.070	10211.700	17169.100	18127.960	11400.300	12374.100	15286.210	17660.300	11569.000	19120.040	13526.300	17252.100	14453.320	16820.600	15987.600	19468.500	15456.100	11323.100	18164.090	19487.200	14081.400	12710.120	16791.600	786629	-1.0000	-0.0000	11	21.1735	0.2171	0.2447	0.2044	786630.0000	1.0000	21.9000	20.7000	20.3000	11 -0%



Dataview22 - Pending Changes (None)

District	New
Population	0
Change - Population	0
Ideal Value	786,630
Deviation	-786,630
% Deviation	-100%

ID	ID:1	AREA	DISTRICT	MEMBERS	LOCKED	NAME	TOTPOP	G20R	G20V	G20P_DV	G20P_RV	G20P_TV
1	581	1979.6718	7	1			786630	530143	403363	161717.2	235706.8	403363.1
2	530	4663.9536	4	1			786630	532597	408059	132452.5	269261	408059.7
3	521	3953.5911	9	1			786630	551010	388974	182464.3	199867.5	388974.7
4	564	654.29028	1	1			786630	558812	405285	202960.2	196045	405285.1
5	563	2110.7383	8	1			786630	531333	393455	149054.9	238697.3	393455.2
6	565	6408.4829	2	1			786630	539264	396912	124503.1	266964.3	396912.3
7	491	3378.0571	14	1			786630	539401	420754	183788.4	231445.1	420753.9
8	566	205.13959	3	1			786630	525659	365287	263276	96456.08	365287.6
9	557	4748.4033	6	1			786629	547668	400172	150885.4	244146.5	400172.5
10	573	2554.4763	15	1			786630	512318	383690	177697.9	199916.1	383689.7
11	526	5640.6689	5	1			786630	538893	397749	145570.9	245990.8	397749
12	562	995.65228	10	1			786630	543200	391706	185644.5	199426.6	391706
13	574	1096.719	13	1			786630	553965	422352	210060.5	207066.9	422352.4
14	572	5690.8296	12	1			786629	517916	384457	127432	251134.9	384457.9
15	418	693.073	11	1			786630	551649	358168	281658.4	72712.1	358167.8

G12P_DV	G12P_RV	G12P_TV	G12S_DV	G12S_RV	G12S_TV	G14G_DV	G14G_RV	G14G_TV	G14A_DV	G14A_RV	G14A_TV
174464.1	195493	376690.2	171123.9	175811.8	368354	58917.56	142019	207184	67979.38	138907	206886.4
131939.3	222037.1	360336.3	128735.4	209022.9	354969	47216.41	156765	209464	55951.97	153196.3	209148.2
223669.7	158801.1	389782.3	214844.9	148678.3	382041	79759.19	122671.4	209595.7	91134.08	118162.4	209296.5
178325.8	188861	372442	177980.3	172901.7	364506	66079.07	127164.4	200327.5	86960.27	115254.7	202214.9
143717.3	216808.7	366239.5	141906.4	201841.8	359355	53138.67	141819.6	199810	66832.35	133518.7	200351.1
139314.8	216014.3	361824.9	139310	194644.8	350822	55709.57	145457.4	207333	69161.46	138960	208121.5
194077.7	188606.3	389148.6	187157.7	170305.5	377491	66798.13	147835.7	222567.5	76689.04	145932	222621
231433.6	108413.9	344952.9	226859.2	100050	338849	79428.83	85849.94	174301.6	92404.8	82979.05	175383.8
212283.2	173816.6	393192.6	214101.2	147386.7	381235	87573.82	130646.3	225753.8	103559	122384.9	225944
155967.6	170592.6	331945.2	152208.9	158076.1	325974	50430.99	120813.6	177008.8	58936.11	118622.6	177558.7
167558.3	193149.4	368006	162635.1	180974.7	361898	57555.84	140091.7	203682.5	66121.32	136581.9	202703.3
189723.7	189983.1	385939.4	187232.3	177885.8	379457	70935.56	138774.5	215035.2	76730.33	138484.1	215214.4
208390	181180.7	394997.8	208206.8	159049.5	384702	68192.87	136695.6	212349.1	78334.91	133836.5	212171.4
153514.4	186699.4	347597.4	147233.6	175089.5	341711	57728.29	135028.1	199165.2	66466.3	132839.7	199306
321613.3	69586.28	394585.1	301583.5	62712.97	374675	109446.7	72299.31	190934.7	120684.9	71460.4	192145.4

G14I_DV	G14I_RV	G14I_TV	G14T_DV	G14T_RV	G14T_TV	G14J_DV	G14J_RV	G14J_TV	G16P_DV	G16P_RV	G16P_TV
70699.8	123099	203066	63567.43	131823.7	204613	81132.6	124990	206123	140772.5	208984.3	366926.5
50830.1	146409	207116	46523.39	151673.9	207888	66778.6	141632	208411	107284.9	236954.3	361016.5
86181.5	105283	203761	74811.87	120866.5	206483	101922	106645	208566	171871	179501.6	371979.7
72733.4	115148	197688	71554.96	118774.3	199811	81013.2	120626	201639	174398.5	181653.3	372817.7
57142.9	130868	198228	54859.52	135059.1	199194	65946.5	134617	200564	128996	222782.2	367163
60122.3	132955	204178	57416.19	137456.5	205265	67001.3	140165	207166	108026.1	241685.9	365079.5
81172	126530	217562	75344.05	131985.9	218078	94490.7	127078	221569	159645.8	204175	380718.3
91315	75793.7	173511	88782.15	78852.6	174582	107095	67837.8	174933	235156.5	94300.15	345310.5
103697	106835	221585	86267.04	124068.7	222269	101160	123327	224487	146138.5	218276.4	379104
56494.8	110851	175066	51682.53	116289.7	175910	72467	104167	176634	144616.6	178349.1	339249.6
65744.2	122038	198586	59222.88	131083.1	200462	75890.1	126477	202367	129048.4	215981.2	364118.9
76413.2	125482	211802	72670.21	132065.7	214073	93193.1	120635	213828	166475.2	189174.1	373016.2
83174.3	115428	207206	78598.31	121137	208721	99250.5	111898	211148	182679.6	184985.2	383513.5
62508.8	123735	196086	57516.48	129377.2	196676	76825.4	120959	197784	114774.6	219001.7	350467.6
130588	50636.9	187774	135229.1	49615.27	191376	138558	52211.7	190769	283276.7	64674.5	358107.3

G16S_DV	G16S_RV	G16S_TV	G18S_DV	G18S_RV	G18S_TV	G18G_DV	G18G_RV	G18G_TV	G18A_DV	G18A_RV	G18A_TV
118161.5	221972.8	360464	143789.8	153159	296949	126080	162038.6	297804.2	128473.9	163870.6	292344.6
86363.27	254888.4	357528	120950.9	179908	300859	99841.96	193659.5	302383.6	97269.86	201797.6	299067.4
146293	199747.7	364555	167334.6	120761.1	288096	143835.7	135907.8	290285.3	146120.1	139472.7	285592.9
136492.1	213438.9	365428	164608.8	144689.7	309299	147957.4	154084	310687.7	152530.9	153833.6	306364.5
101410.2	245164.6	361479	125983.1	164031.5	290015	108593.5	172997.2	290539.6	111022.7	173874.2	284896.9
93350.75	253028.6	361169	115918.6	173717.1	289636	98093.54	185083.2	291659.2	99059.97	188251.3	287311.3
129873.6	219281	369874	164835.5	145710.2	310546	141506.2	160007.9	311617.4	147549.8	159309.8	306859.6
196918.2	126643.5	337747	216092.6	72203.2	288296	202811.5	80430.86	289826.2	197481.1	88643.84	286124.9
137938.9	212792.5	370571	153735.9	143043.5	296779	131878.3	156789.4	297109.4	131958.5	160276.5	292235.1
117853.4	202314.4	334552	148400.7	132055.6	280456	132843.5	142532	282411.8	127314.8	151625.9	278940.7
109049.6	228439.4	356692	137702.1	149785.4	287488	113264.4	166653.3	289427.7	114694.2	167093.9	281788.1
132944.1	219731.3	368766	160171.3	139817.7	299989	136342	155562	301141.9	139754.1	157426.2	297180.4
148045.6	205050.7	372802	179824.5	136118.7	315943	160414.3	147623.3	316501.6	164015.6	145497.7	309513.3
100495.9	227827.2	345649	123373.4	156245.9	279619	104040.9	168039.1	280717	102245.4	173223.4	275468.9
239508.1	85546.02	341801	234962.5	46011.7	280974	221782.2	54091.87	282233.7	226466.4	51867.38	278333.8

G18I_DV	G18I_RV	G18I_TV	G18T_DV	G18T_RV	G18T_TV	G18J_DV	G18J_RV	G18J_TV	EA51_DV	EA51_RV	EA51_TV
122793	157548	292109	123901.6	163815.8	294524	123844	167582	291426	143773.6	206810	350584
96162.9	190781	297513	97676.91	193772.7	298495	95818.9	200159	295978	113118.6	242102.9	355222
135157	134586	282486	140661.7	135178.5	283962	137996	144060	282055	166805.9	172824.1	339630
140173	150619	305297	149199.7	150984.9	307641	145645	159082	304727	163550.4	194435.9	357986
102323	172692	287453	109979.4	171682.2	288683	108363	178436	286800	123466	218531.3	341997
94488.5	179687	286098	98017.87	182049.6	287140	96599.1	188426	285025	116463	227822.6	344286
136894	151263	301855	144608.9	154572.7	306459	138273	164181	302453	162559.9	203625.7	366186
197994	75411	283313	198206.2	81017	284981	195259	87547.8	282807	216715	110841.7	327557
130215	148457	289778	127304.4	157940.9	292183	131408	157358	288766	160707.8	187933.1	348641
128562	137228	276053	127692.1	143140.2	277167	124931	150071	275002	144627.5	188423.3	333051
107626	163094	282521	112698.9	163721.5	283804	109631	172510	282141	133773.9	209814.4	343588
132737	150069	295690	139027.3	151415.7	297609	138043	157922	295965	154180.5	192243.4	346424
154509	140454	307713	157736.6	146899.8	311611	154798	152692	307489	178610.4	190816.6	369427
112271	156264	277621	103002.5	167175.1	276921	102534	172216	274750	124360.6	208226.8	332588
215658	48178.8	274321	221634.6	50557.28	277583	220311	55819.6	276131	246124.3	74076.35	320201

EA52_DV	EA52_RV	EA52_TV	POPULATION	DEVIATION	F_DEVIATIO	DISTRICT_N	EA53	F_G20P_RV	F_EA51_RV
145641.3	187349.1	332991	786630	0	0	7	57.88085	0.584354	0.589902
115539.3	222069.8	337609	786630	0	0	4	67.29174	0.659857	0.681555
165214.3	157967.4	323182	786630	0	0	9	50.31423	0.513832	0.50886
169849.2	172371	342220	786630	0	0	1	51.54992	0.483721	0.543138
126569.5	198275.3	324845	786630	0	0	8	62.4661	0.60667	0.638986
113931	212812.5	326744	786630	0	0	2	66.69989	0.672603	0.661726
166073.6	181922.6	347996	786630	0	0	14	54.13648	0.550072	0.556072
225591.8	89388.17	314980	786630	0	0	3	29.66365	0.264055	0.338389
150303.3	181160.6	331464	786629	-1	-0.000001	6	56.29489	0.610103	0.539045
151159.2	165011.9	316171	786630	0	0	15	53.88655	0.521036	0.565749
132940.1	192594.8	325535	786630	0	0	5	60.78969	0.618457	0.610656
159145.4	172184.6	331330	786630	0	0	10	53.32092	0.509123	0.554937
183959.6	167825.6	351785	786630	0	0	13	49.2329	0.490271	0.51652
121398.3	193898.9	315297	786629	-1	-0.000001	12	63.07126	0.653218	0.626081
249012.2	58532.89	307545	786630	0	0	11	19.79496	0.203011	0.231343

F_EA52_RV	IDEAL_VALU	F_POPULATI	F2OPRES_RD	FEDEA	FEDEA_RDI	MULTIPLE_F	DISTRICT_L
0.562626	786630	1	59.3	56.7	54.8	7 0	7 0%
0.657772	786630	1	67	66	64	4 0	4 0%
0.488788	786630	1	52.3	47.7	46.1	9 0	9 0%
0.503685	786630	1	49.1	51.5	50.1	1 0	1 0%
0.610369	786630	1	61.6	62	60.3	8 0	8 0%
0.651314	786630	1	68.2	65.1	63.3	2 0	2 0%
0.522772	786630	1	55.7	53.2	51.6	14 0	14 0%
0.28379	786630	1	26.8	30.4	29.6	3 0	3 0%
0.546547	786630	1	61.8	52.9	51.3	6 -1	6 -0%
0.521907	786630	1	52.9	53.7	52.2	15 0	15 0%
0.591626	786630	1	62.8	58.8	56.9	5 0	5 0%
0.519677	786630	1	51.8	52.2	50.8	10 0	10 0%
0.477068	786630	1	49.6	48.6	47.2	13 0	13 0%
0.614972	786630	1	66.3	61.3	59.3	12 -1	12 -0%
0.190323	786630	1	20.5	19.4	19	11 0	11 0%

**To:** Varrasso, Theresea[Theresea.Varrasso@ohiosenate.gov]  
**Cc:** Strigari, Frank[Frank.Strigari@ohiosenate.gov]  
**From:** DiRossi, Ray  
**Sent:** Wed 11/3/2021 3:13:42 PM  
**Subject:** Sub SB 258  
[I\\_134\\_2106-2.pdf](#)

Embargoed until further notice  
See attached sub bill draft from LSC for SB 258

Thanks

**Ray DiRossi**  
**Director of Finance and Budget**  
**Ohio Senate Majority Caucus**  
**Statehouse, Suite 205**  
**Columbus, Ohio 43215**



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DEPO\_CONG\_0298



DIROSSI\_006520

**To:** McColley, Robert[Robert.McColley@ohiosenate.gov]  
**From:** DiRossi, Ray  
**Sent:** Mon 11/15/2021 9:05:40 PM  
**Subject:** SB 258 Ray notes  
[SB 258 Substitute Bill items.docx](#)  
[graphic.xlsx](#)

See 2 attachments  
Ray

DEPO\_CONG\_0299



DIROSSI\_005598

- Required to have at least 65 whole counties Map has 76
  - Map only splits 12 counties (76 whole)
  - Current map splits 23 counties (65 whole)
  - Most whole counties in at least the last 50+ years
  - Whole counties: 1971: 68, 1981: 66, 1991: 68, 2001: 67 and 2011: 65
  
- Counties with 4 districts – constitutionally prohibited Map complies = 0
  - 1971: 2, 1981: 0, 1991: 1, 2001: 1 and 2011: 2
  
- Counties with 3 districts – allowed 5 Map complies = 2
  - 1971: 3, 1981: 1, 1991: 0, 2001: 2 and 2011: 5
  
- Counties with 2 districts – allowed 18 Map complies = 10
  - Clark, Fairfield, Franklin, Holmes, Lorain, Ross, Shelby, Summit, Washington & Wood
  
- Attempt to have 1 whole County per CD (exclude wholly contained) Map achieves
  - 2011 map had 2 such (all parts) districts = CD 9 and CD 13
  
- One person one vote – state population of 11,799,448 Map achieves
  - 13 CDs at 786,630 (target) and 2 CDs at 786,629 (-1)

**County splits: Current versions of maps**

McColley (SB 258)	12 splits	14 total splits
House Dems (HB 483)	14 splits	14 total splits
Sykes / Yuko 258 (Nov SB 237)	14 splits	14 total splits
Contest Winning map #1, 3	14 splits	14 total splits
Current map	23 splits	32 total splits

**Subdivision splits: Current versions of maps**

**McColley (SB 258) 14 splits: 8 TWP and 6 Municipal Corps**

1. Clark	Mad River TWP	CD 10 / CD 15
2. Cuyahoga	Rocky River (#80)	CD 11 / CD 13
3. Cuyahoga	Oakwood (#355)	CD 11 / CD 14
4. Fairfield	Columbus (#1)	CD 12 / CD 15
5. Franklin	Columbus (#1)	CD 3 / CD 15
6. Hamilton	Glendale (#444)	CD 1 / CD 8
7. Hamilton:	Sycamore TWP	CD 1 / CD 2
8. Holmes	Berlin TWP	CD 7 / CD 12
9. Lorain	Columbia TWP	CD 5 / CD 13
10. Ross	Union TWP	CD 2 / CD 15
11. Shelby	Green TWP	CD 4 / CD 8
12. Summit	Cuyahoga Falls (#15)	CD 7 / CD 13
13. Washington	Belpre TWP	CD 6 / CD 12
14. Wood	Perrysburg TWP	CD 5 / CD 9

Only 3 of top 100 most populous cities are split (Columbus, Cuyahoga Falls & Rocky River)



**Sykes / Yuko 258 (Nov SB 237)****16 splits: 2 TWP and 14 Municipal Corps**

1. Clark: Springfield
2. Cuyahoga: Berea
3. Guernsey: Cambridge
4. Hamilton: Maderia
5. Hancock: Findlay
6. Franklin: Columbus
7. Franklin: Prairie TWP
8. Greene: Beavercreek
9. Knox: Mount Vernon
10. Lorain: Amherst
11. Mahoning: Campbell
12. Medina: Wooster
13. Stark: Massillon
14. Union: Marysville
15. Union: Millcreek TWP
16. Wood: Bowling Green

**House Dems (HB 483)****21 splits: 16 TWP and 5 Municipal Corps**

1. Ashland: Lake TWP
2. Clinton: Liberty TWP
3. Clinton: Union TWP
4. Cuyahoga: Seven Hills
5. Franklin: Columbus
6. Franklin: Prairie TWP
7. Greene: Beavercreek
8. Greene: Beavercreek TWP
9. Hamilton: Green TWP
10. Hamilton: Miami TWP
11. Holmes: Walnut Creek TWP
12. Lorain: North Ridgeville
13. Mahoning: Poland TWP
14. Marion: Waldo TWP
15. Ross: Greenfield
16. Ross: Concord TWP
17. Ross: Buckskin TWP
18. Stark: Canton TWP
19. Washington: Fairfield TWP
20. Washington: Dunham TWP
21. Wyandot: Antrim TWP

**County Split Comparison – to last decade**

	<b>2011 Enacted</b>	<b>2021 Proposal</b>
Athens	Split: 2 CDs	
Clark		Split: 2 CDs
Cuyahoga	Split: 4 CDs	Split: 3 CDs
Erie	Split: 2 CDs	
Fairfield		Split: 2 CDs
Fayette	Split: 2 CDs	
Franklin	Split: 3 CDs	Split: 2 CDs
Hamilton	Split: 2 CDs	Split: 3 CDs
Holmes		Split: 2 CDs
Huron	Split: 2 CDs	
Lorain	Split: 3 CDs	Split: 2 CDs
Lucas	Split: 2 CDs	
Mahoning	Split: 2 CDs	
Marion	Split: 2 CDs	
Medina	Split: 2 CDs	
Mercer	Split: 3 CDs	
Muskingum	Split: 2 CDs	
Ottawa	Split: 2 CDs	
Portage	Split: 3 CDs	
Richland	Split: 2 CDs	
Ross	Split: 2 CDs	Split: 2 CDs
Scioto	Split: 2 CDs	
Shelby		Split: 2 CDs
Stark	Split: 3 CDs	
Summit	Split: 4 CDs	Split: 2 CDs
Trumbull	Split: 2 CDs	
Tuscarawas	Split: 2 CDs	
Washington		Split: 2 CDs
Wood		Split: 2 CDs
	<b>23 splits</b>	<b>12 splits</b>

**2010 Split Subdivisions (35\*) \* = Annexation changes in geography between 2010/2020**

Cuyahoga	Berea	
Cuyahoga	Cleveland	made whole in 2021
Cuyahoga	Parma	
Cuyahoga	Rocky River	
Fayette	Jasper TWP	
Fayette	Union TWP	
Franklin	Columbus	population required split
Franklin	Gahanna	
Franklin	Grandview Heights	
Franklin	Grove City	
Franklin	Groveport	
Franklin	New Albany	
Franklin	Obetz	
Franklin	Westerville	
Franklin	Worthington	
Hamilton	Cincinnati	made whole in 2021
Lorain	Grafton TWP	
Lucas	Toledo	made whole in 2021
Marion	Claridon TWP	
Medina	Brunswick TWP	
Mercer	Butler TWP	
Mercer	Jefferson TWP	
Ottawa	Berlin TWP	
Portage	Brimfield TWP	
Richland	Madison TWP	
Ross	Twin TWP	
Scioto	Rush TWP	
Stark	Canton	made whole in 2021
Stark	Canton TWP	
Stark	Lake TWP	
Stark	Perry TWP	
Stark	Plain TWP	
Summit	Akron	made whole in 2021
Summit	Cuyahoga Falls	
Summit	Springfield TWP	

			<b>FED</b>
			<b><u>12 to 20</u></b>
1	786,630		51.5
2	786,630		65.1
3	786,630		30.4
4	786,630		66.0
5	786,630		58.8
6	786,629	-1	52.9
7	786,630		56.7
8	786,630		62.0
9	786,630		47.7
10	786,630		52.2
11	786,630		19.4
12	786,629	-1	61.3
13	786,630		48.6
14	786,630		53.2
15	786,630		53.7

**Competitive CDs (+/- 4%) using FED data**

7 McColley (SB 258)  
5 Yuko Sykes (SB 237) Sept 29<sup>th</sup>  
5 Yuko Sykes (SB 237) Nov 10<sup>th</sup>  
5 House Dem (HB 483)  
2 Current Map

**Competitive CDs (+/- 4%) using all data**

5 McColley (SB 258)  
5 Yuko Sykes (SB 237) Sept 29<sup>th</sup>  
4 Yuko Sykes (SB 237) Nov 10<sup>th</sup>  
5 House Dem (HB 483)  
2 Current Map



Population affected by a split county analysis

<b>Population of Split counties</b>		<b>Big 3</b>	<b>Other</b>	<b>Total</b>
McColley (SB 258)	12 splits	3,419,263	1,509,879	4,929,142
House Dems (HB 483)	14 splits	3,419,263	1,447,208	4,866,471
Sykes / Yuko 258 (Nov SB 237)	14 splits	3,419,263	1,708,403	5,127,666
Contest winning maps #1, 3	14 splits	3,419,263		
Current map	23 splits	3,419,263	3,263,906	6,683,169

Columbus Franklin county portion = 880,329

Note: 89.35% is max score

Columbus in CD 3 = 584,813 66.4%

Columbus and circumscribed area Franklin county portion = 1,019,670

Note: 77.14% is max score

Senate REP Area in CD 3 = 697,723 68.42%

House DEM Area in CD 3 = 625,181 61.30%

Senate DEM Area in CD 3 = 620,960 60.80%

**Distance Measurements**

2011 CD 6 is 201 miles long

2011 CD 4 is 158 miles long

Senate REP 2021 CD 6 is 159 miles long

Senate REP 2021 CD 5 is 167 miles long

Senate DEM 2021 CD 12 is 175 miles long

House DEM 2021 CD 2 is 151 miles long

House DEM 2021 CD 5 is 150 miles long

	BASELINE			FED
				12 to 20
1	768,550	31,084	4.22%	53.60
2	734,793	(2,673)	-0.36%	57.20
3	809,749	72,283	9.80%	30.20
4	716,177	(21,289)	-2.89%	63.60
5	731,052	(6,414)	-0.87%	59.70
6	687,118	(50,348)	-6.83%	64.20
7	737,340	(126)	-0.02%	61.00
8	745,736	8,270	1.12%	66.00
9	704,051	(33,415)	-4.53%	36.30
10	729,405	(8,061)	-1.09%	52.90
11	692,589	(44,877)	-6.09%	18.30
12	808,944	71,478	9.69%	55.30
13	698,441	(39,025)	-5.29%	42.00
14	730,056	(7,410)	-1.00%	53.90
15	766,337	28,871	3.91%	55.70
16	739,110	1,644	0.22%	56.40



**Ohio Senate**  
Senate Building  
1 Capitol Square  
Columbus, Ohio 43215  
(614) 466-8150

**Exhibit #**

**DiRossi 06**

12/07/2021 - ER

exhibitssticker.com

**Rob McColley**  
Senate Majority Whip  
1st Senate District

Thank you, Chairwoman Gavarone, Vice-Chair O'Brien, Ranking Member Maharath and members of the Local Government and Elections Committee for allowing me to present testimony today for Substitute Senate Bill 258. After considering multiple maps presented by Democrat and Republican Caucuses in both the House and the Senate, and listening to the public's input on all of those maps, we offer this map that is not only constitutionally compliant, but the most competitive map offered by any caucus to date. It is also a map that splits the least counties of any map offered by any caucus, keeps Ohio's largest cities whole, installs compact districts and implements many of the requested changes we heard in testimony.

Article 19, Section 2(B)(5) of the Ohio Constitution describes the process that must be followed when splitting counties in a congressional map. In essence, a map may have up to 23 split counties with up to 18 being split once and up to five being split twice. This map splits only 12 counties with only two of those counties being split twice. The counties that are split once are Clark, Fairfield, Franklin, Holmes, Lorain, Ross, Shelby, Summit, Washington and Wood. The Counties split twice are Hamilton and Cuyahoga. Notably, for the first time since the map passed thirty years ago, Lucas County will be whole and for the first time since the map passed twenty years ago Stark County will be whole. The impact on several of Ohio's other large counties is also minimized by Franklin and Summit County having the least splits since the maps passed thirty years ago. Finally, the map complies with Article 19, Section 2(B)(8) by including an entire county in each district where possible. If passed, this map would have the least counties split in over fifty years. Additionally, this map splits two less counties than both the House and Senate Democrat proposals.

Since the introduction of SB258, we have maintained that it is important to keep Ohio's largest cities whole. With exception to Columbus, which must be split under the Constitution and cities that straddle county lines and, therefore, do not count as a split under the Constitution, 98 of Ohio's 100 largest cities are kept whole in this map (Rocky River, Cuyahoga Falls). In total, only eight townships and six municipalities are split in this proposed map, which more than adequately complies with Article 19, Section 1(C)(3)(b)'s requirement that the general assembly not unduly split governmental units.

Article 19, Section 2(B)(2) also requires that districts be compact. This requirement is not applicable to a four-year map, however, under Section 1(C)(3)(c). In such an instance, the

general assembly shall attempt, but is not required to draw compact districts. Nevertheless, the districts presented before you are compact.

Finally, the map before you is the most competitive map offered by any caucus to date and the most competitive Ohio congressional map in decades. Ohio is subject to swings in voter preferences, particularly in federal elections. Even though, with exception to 2006, Republicans have swept every election for statewide constitutional office since 1994, Ohio has voted for a both a Democrat and a Republican for President in the past four presidential elections and continues to be represented by both a Democrat and Republican in the United States Senate. Clearly, Ohioans are bifurcating between federal and state elections and issues. Therefore, because the map before you is for United States Congressional districts, it makes sense to judge competitiveness based upon statewide federal elections over the last ten years. This allows us to capture the true nature of Ohio’s voting tendencies in federal elections and to insulate from outliers. When evaluating these districts in the federal statewide context and defining a competitive district as one with a 46%-54% Republican index, this map has six seats that lean Republican, seven seats that are competitive and two seats that lean Democrat. The indexes are as follows:

<b>Congressional District #</b>	<b>Population</b>	<b>Deviation</b>	<b>Federal Statewide Elections 2012-2020</b>
1	786,630	0	51.5
2	786,630	0	65.1
3	786,630	0	30.4
4	786,630	0	66.0
5	786,630	0	58.8
6	786,629	-1	52.9
7	786,630	0	56.7
8	786,630	0	62.0
9	786,630	0	47.7
10	786,630	0	52.2
11	786,630	0	19.4
12	786,629	-1	61.3
13	786,630	0	48.6
14	786,630	0	53.2
15	786,630	0	53.7

Article 19, Section 1(C)(3)(a) states that a map shall not unduly favor or disfavor a party or its

incumbents. No sporting event should ever favor or disfavor a team by some predetermined final score before either team walks on the field. A congressional map should not be judged to favor or disfavor either party that way either. Rather, it should be judged based upon how many districts are going to be determined by the various important issues and candidates in that election. This map embodies that belief by ensuring a plurality of the districts will be competitive in any given cycle. Its seven competitive districts are two more than any House or Senate Democrat proposal and five more than the map passed in 2011. Further, this map neither favors nor disfavors either party's incumbents. It accomplishes this by only combining two incumbents, who are required to be combined through the prohibition against splitting Cincinnati.

The map before you complies with the requirements placed upon the General Assembly under the Ohio Constitution. It is the product of a deliberate effort to draw compact districts, minimize county splits, keep Ohio's largest cities whole and ensure a plurality of Ohio's congressional districts will be competitive. Thank you Chairwoman Gavarone, Vice-Chair O'Brien, Ranking Member Maharath and members of the Local Government and Elections Committee for allowing me to present testimony on Substitute Senate Bill 258 and the proposed congressional district map contained therein. I would be happy to take any questions.

**Competitive CDs (+/- 4%) using FED data**

7	McColley (SB 258)
5	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
5	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
2	Current Map

**Competitive CDs (+/- 4%) using all data**

5	McColley (SB 258)
5	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
2	Current Map

**Competitive CDs (+/- 3.75%) using FED data**

7	McColley (SB 258)
5	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
5	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 3.75%) using all data**

4	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
2	Current Map

**Competitive CDs (+/- 3.5%) using FED data**

6	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
4	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 3.5%) using all data**

4	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
4	House Dem (HB 483)
1	Current Map

**Competitive CDs (+/- 3%) using FED data**

5	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
4	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 3%) using all data**

3	McColley (SB 258)
3	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
3	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
2	House Dem (HB 483)
1	Current Map

**Competitive CDs (+/- 2.5%) using FED data**

4	McColley (SB 258)
3	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
3	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
3	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 2.5%) using all data**

3	McColley (SB 258)
2	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
2	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
1	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 2%) using FED data**

2	McColley (SB 258)
3	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
3	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
2	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 2%) using all data**

3	McColley (SB 258)
2	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
2	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
0	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 1.5%) using FED data**

2	McColley (SB 258)
2	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
2	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
1	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 1.5%) using all data**

2	McColley (SB 258)
1	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
1	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
0	House Dem (HB 483)
0	Current Map





Office	District	First	Last	Party	Term Limit	Address	City	State	Zip	Zip plus 4
Rep.	1	Scott	Wiggam	(R)	2026	316 E. Beverly Road	Wooster	Ohio	44691	
Rep.	2	Marilyn	John	(R)	2028	21 Cold Draw Court	Shelby	Ohio	44875	
Rep.	3	Haraz	Ghanbari	(R)	2028	26811 Dogwood Lane	Perrysburg	Ohio	43551	
Rep.	4	Robert	Cupp	(R)	2022	3003 W. Hume Road	Lima	Ohio	45806	9452
Rep.	5	Timothy	Ginter	(R)	2022	875 Homewood Avenue	Salem	Ohio	44460	
Rep.	6	Phillip	Robinson	(D)	2026	7099 Longview Drive	Solon	Ohio	44139	
Rep.	7	Thomas	Patton	(R)	2024	17157 Rabbit Run Drive	Strongsville	Ohio	44136	6243
Rep.	8	Kent	Smith	(D)	2022	34 E. 290th Street	Euclid	Ohio	44123	
Rep.	9	Janine	Boyd	(D)	2022	1366 Cleveland Heights Boulevard	Cleveland Heights	Ohio	44121	
Rep.	10	Terrence	Upchurch	(D)	2026	1426 Clearaire Road	Cleveland	Ohio	44110	
Rep.	11	Stephanie	Howse	(D)	2022	1804 E. 93rd Street	Cleveland	Ohio	44106	
Rep.	12	Juanita	Brent	(D)	2026	16804 Glendale Avenue	Cleveland	Ohio	44128	
Rep.	13	Michael	Skindell	(D)	2026	16800 Deleware Avenue	Lakewood	Ohio	44107	5517
Rep.	14	Bride	Sweeney	(D)	2026	3632 W. 133rd Street	Cleveland	Ohio	44111	
Rep.	15	Jeffrey	Crossman	(D)	2026	6429 S. Park Boulevard	Parma	Ohio	44134	
Rep.	16	Monique	Smith	(D)	2028	19793 Coffinberry Boulevard	Fairview Park	Ohio	44126	
Rep.	17	Adam	Miller	(D)	2024	1600 Roxbury Road	Columbus	Ohio	43212	
Rep.	18	Kristin	Boggs	(D)	2024	834 Hamlet Street	Columbus	Ohio	43215	
Rep.	19	Mary	Lightbody	(D)	2026	4948 E. Walnut Street	Westerville	Ohio	43081	
Rep.	20	Richard	Brown	(D)	2026	7559 Bruns Court	Canal Winchester	Ohio	43110	
Rep.	21	Beth	Liston	(D)	2026	2193 Stratingham Drive	Dublin	Ohio	43016	
Rep.	22	David	Leland	(D)	2022	361 Walhalla Road	Columbus	Ohio	43202	
Rep.	23	Laura	Lanese	(R)	2024	2315 Milligan Grove	Grove City	Ohio	43123	
Rep.	24	Allison	Russo	(D)	2026	1850 Tewksbury Road	Upper Arlington	Ohio	43221	
Rep.	25	Dontavius	Jarrells	(D)	2028	1245 Mt. Vernon Avenue Apt. 3H	Columbus	Ohio	43203	
Rep.	26	VACANT	VACANT							
Rep.	27	Thomas	Brinkman	(R)	2022	3215 Hardisty Avenue	Cincinnati	Ohio	45208	3006
Rep.	28	Jessica	Miranda	(D)	2026	11511 Oxfordshire Lane	Cincinnati	Ohio	45240	
Rep.	29	Cynthia	Abrams	(R)	2028	92 Fawn Drive	Harrison	Ohio	45030	
Rep.	30	William	Seitz	(R)	2024	2097 Beech Grove Drive	Cincinnati	Ohio	45233	4915
Rep.	31	Brigid	Kelly	(D)	2024	3421 Traskwood Circle Apt. D	Cincinnati	Ohio	45208	

Office	District	First	Last	Party	Term Limit	Address	City	State	Zip	Zip plus 4
Rep.	32	Catherine	Ingram	(D)	2024	250 Dorchester Avenue	Cincinnati	Ohio	45219	
Rep.	33	Sedrick	Denson	(D)	2026	8298 Kingsmere Court	Cincinnati	Ohio	45231	
Rep.	34	Emilia	Sykes	(D)	2022	109 N. Howard Street Unit A	Akron	Ohio	44308	
Rep.	35	Tavia	Galonski	(D)	2026	1137 Allendale Avenue	Akron	Ohio	44306	
Rep.	36	Robert	Young	(R)	2028	2037 Greensburg Road	North Canton	Ohio	44720	
Rep.	37	Casey	Weinstein	(D)	2026	8 N. Westhaven Drive	Hudson	Ohio	44236	
Rep.	38	William	Roemer	(R)	2026	3616 Southern Road	Richfield	Ohio	44286	
Rep.	39	Willis	Blackshear	(D)	2028	531 Belmont Park N. Apt. 411	Dayton	Ohio	45405	
Rep.	40	Philip	Plummer	(R)	2026	1831 Kershner Road	Dayton	Ohio	45414	
Rep.	41	Andrea	White	(R)	2028	4744 Bokay Drive	Kettering	Ohio	45440	
Rep.	42	Tom	Young	(R)	2028	1121 Cedar Creek Circle	Dayton	Ohio	45459	
Rep.	43	Rodney	Creech	(R)	2028	5062 Bantas Creek Road	West Alexandria	Ohio	45381	
Rep.	44	Paula	Hicks-Hudson	(D)	2026	2633 Robinwood Avenue	Toledo	Ohio	43610	
Rep.	45	Lisa	Sobecki	(D)	2026	2714 117th Street	Toledo	Ohio	43611	
Rep.	46	Michael	Sheehy	(D)	2022	1129 Schmidlin Road	Oregon	Ohio	43616	
Rep.	47	Derek	Merrin	(R)	2024	4623 Lakeside Drive Unit 3109	Maumee	Ohio	43537	
Rep.	48	Scott	Oelslager	(R)	2026	215 North Circle Drive SW.	North Canton	Ohio	44709	
Rep.	49	Thomas	West	(D)	2024	625 12th Street NW.	Canton	Ohio	44703	
Rep.	50	Reginald	Stoltzfus	(R)	2026	13789 Telpahak Street SE.	Minerva	Ohio	44657	
Rep.	51	Sara	Carruthers	(R)	2026	601 Glenway Drive	Hamilton	Ohio	45013	
Rep.	52	Jennifer	Gross	(R)	2028	7350 Lakota Springs Drive	West Chester	Ohio	45069	
Rep.	53	Thomas	Hall	(R)	2028	6364 Trenton Franklin Road	Middletown	Ohio	45042	
Rep.	54	Paul	Zeltwanger	(R)	2022	4607 White Blossom Boulevard	Mason	Ohio	45040	
Rep.	55	Gayle	Manning	(R)	2026	9436 Foxboro Drive	North Ridgeville	Ohio	44039	
Rep.	56	Joseph	Miller	(D)	2026	433 Northpointe Boulevard	Amherst	Ohio	44001	
Rep.	57	Dick	Stein	(R)	2024	2854 State Route 61	Norwalk	Ohio	44857	
Rep.	58	Michele	Lepore-Hagan	(D)	2022	562 Madera Avenue	Youngstown	Ohio	44504	
Rep.	59	Al	Cutrona	(R)	2028	3755 Mercedes Place Unit 9	Canfield	Ohio	44406	
Rep.	60	Dan	Troy	(D)	2028	31600 Lakeshore Boulevard Apt. 37	Willowick	Ohio	44095	
Rep.	61	Jamie	Callender	(R)	2026	9920 Ashwood Trail	Concord	Ohio	44060	
Rep.	62	Scott	Lipps	(R)	2024	157 Millard Drive	Franklin	Ohio	45005	

Office	District	First	Last	Party	Term Limit	Address	City	State	Zip	Zip plus 4
Rep.	63	Michael	Loychik	(R)	2028	4022 Westlake Road	Cortland	Ohio	44410	
Rep.	64	Michael	O'Brien	(D)	2022	1849 Edgewood NE.	Warren	Ohio	44483	
Rep.	65	Jean	Schmidt	(R)	2028	771 Wards Corner Road	Loveland	Ohio	45140	9049
Rep.	66	Adam	Bird	(R)	2028	3562 Behymer Road	Cincinnati	Ohio	45245	
Rep.	67	Kris	Jordan	(R)	2026	7740 Marysville Road	Ostrander	Ohio	43061	
Rep.	68	Rick	Carfagna	(R)	2024	6155 Baneberry Drive	Westerville	Ohio	43082	
Rep.	69	Sharon	Ray	(R)	2028	283 Stratford Avenue	Wadsworth	Ohio	44281	
Rep.	70	Darrell	Kick	(R)	2024	8050 Twp Road 462	Loudonville	Ohio	44842	
Rep.	71	Mark	Fraizer	(R)	2028	20 W. North Street	Newark	Ohio	43055	
Rep.	72	Kevin	Miller	(R)	2030	6170 Pleasant Chapel Road	Newark	Ohio	43056	
Rep.	73	Brian	Lampton	(R)	2028	960 N Fairfield Road	Beavercreek	Ohio	45434	
Rep.	74	Bill	Dean	(R)	2024	649 N Monroe Drive	Xenia	Ohio	45385	
Rep.	75	Gail	Pavliga	(R)	2028	1965 New Milford Road	Atwater	Ohio	44201	
Rep.	76	Diane	Grendell	(R)	2028	7413 Tattersall Street	Chesterland	Ohio	44026	2036
Rep.	77	Jeffrey	LaRe	(R)	2028	7587 Cumberland Circle	Canal Winchester	Ohio	43110	
Rep.	78	Brian	Stewart	(R)	2028	15075 Home Court	Ashville	Ohio	43103	
Rep.	79	Kyle	Koehler	(R)	2022	4674 Hominy Ridge Road	Springfield	Ohio	45502	
Rep.	80	Jena	Powell	(R)	2026	8172 State Route 722	Arcanum	Ohio	45304	
Rep.	81	James	Hoops	(R)	2026	195 Old Creek Drive	Napoleon	Ohio	43545	9632
Rep.	82	Craig	Riedel	(R)	2024	1246 Hilton Head Court	Defiance	Ohio	43512	
Rep.	83	Jon	Cross	(R)	2026	16511 Maureen Drive	Kenton	Ohio	43326	
Rep.	84	Susan	Manchester	(R)	2026	29566 State Route 385	Lakeview	Ohio	43331	
Rep.	85	Nino	Vitale	(R)	2022	4940 Benson Road	Urbana	Ohio	43078	
Rep.	86	Tracy	Richardson	(R)	2026	1807 Chiprock Drive	Marysville	Ohio	43040	
Rep.	87	Riordan	McClain	(R)	2024	7915 Township Highway 136	Nevada	Ohio	44849	
Rep.	88	Gary	Click	(R)	2028	1473 County Road 268	Vickery	Ohio	43464	
Rep.	89	DJ	Swearingen	(R)	2028	3806 Lawrence Avenue	Huron	Ohio	44839	
Rep.	90	Brian	Baldrige	(R)	2026	14475 State Route 136	Winchester	Ohio	45697	
Rep.	91	Shane	Wilkin	(R)	2026	4151 E. Danville Road	Hillsboro	Ohio	45133	
Rep.	92	Mark	Johnson	(R)	2028	330 Red Bud Road	Chillicothe	Ohio	45601	
Rep.	93	Jason	Stephens	(R)	2028	26 CO. Road 230	Kitts Hill	Ohio	45645	

Office	District	First	Last	Party	Term Limit	Address	City	State	Zip	Zip plus 4
Rep.	94	James	Edwards	(R)	2024	3 Blair Court	Nelsonville	Ohio	45764	
Rep.	95	Don	Jones	(R)	2026	34755 Jones Road	Freeport	Ohio	43973	
Rep.	96	Ron	Ferguson	(R)	2028	299 Orlando Manor	Wintersville	Ohio	43953	
Rep.	97	Adam	Holmes	(R)	2028	5480 Creamery Road	Nashport	Ohio	43830	
Rep.	98	Brett	Hillyer	(R)	2026	3837 Clay Court SE.	Dennison	Ohio	44621	
Rep.	99	Sarah	Fowler Arthur	(R)	2028	710 Garrison Road	Ashtabula	Ohio	44004	
Sen.	1	Robert	McColley	(R)	2026	15 Lemans Drive	Napoleon	Ohio	43545	
Sen.	2	Theresa	Gavarone	(R)	2028	1537 Cedar Lane	Bowling Green	Ohio	43402	
Sen.	3	Tina	Maharath	(D)	2026	85 E. Hocking Street	Canal Winchester	Ohio	43110	
Sen.	4	George	Lang	(R)	2028	7277 St. Ives Place	West Chester	Ohio	45069	
Sen.	5	Stephen	Huffman	(R)	2026	862 Buckeye Court	Tipp City	Ohio	45371	
Sen.	6	Niraj	Antani	(R)	2028	8547 White Cedar Drive Apt. 321	Miamisburg	Ohio	45342	
Sen.	7	Stephen	Wilson	(R)	2026	4905 Water Stone Lane	Maineville	Ohio	45039	
Sen.	8	Louis	Blessing	(R)	2026	3378 Dolomar Drive	Cincinnati	Ohio	45239	
Sen.	9	Cecil	Thomas	(D)	2024	515 Clinton Springs Avenue	Cincinnati	Ohio	45217	
Sen.	10	Bob	Hackett	(R)	2024	2050 Palouse Drive	London	Ohio	43140	
Sen.	11	Teresa	Fedor	(D)	2026	3708 S. Beverly Hills Drive	Toledo	Ohio	43614	
Sen.	12	Matt	Huffman	(R)	2024	2220 Merit Avenue	Lima	Ohio	45805	
Sen.	13	Nathan	Manning	(R)	2026	38179 Terrell Drive	North Ridgeville	Ohio	44039	
Sen.	14	Terry	Johnson	(R)	2028	74 A McDaniel Road	McDermott	Ohio	45652	
Sen.	15	Hearcel	Craig	(D)	2028	1026 Linwood Avenue	Columbus	Ohio	43206	
Sen.	16	Stephanie	Kunze	(R)	2024	6555 Longshore Street Unit 416	Dublin	Ohio	43017	
Sen.	17	Bob	Peterson	(R)	2022	5564 Grassy Branch Road	Sabina	Ohio	45169	
Sen.	18	Jerry	Cirino	(R)	2028	8651 Kirtland-Chardon Road	Kirtland	Ohio	44094	
Sen.	19	Andrew	Brenner	(R)	2026	102 W. Lincoln Avenue	Deleware	Ohio	43015	
Sen.	20	Tim	Schaffer	(R)	2028	1173 Stone Run Court	Lancaster	Ohio	43130	
Sen.	21	Sandra	Williams	(D)	2022	12518 Fairhill Road	Cleveland	Ohio	44120	
Sen.	22	Mark	Romanchuk	(R)	2028	3306 Oakstone Drive	Mansfield	Ohio	44903	
Sen.	23	Nickie	Antonio	(D)	2026	1305 Belle Avenue	Lakewood	Ohio	44107	
Sen.	24	Matt	Dolan	(R)	2024	515 Solon Road	Chagrin Falls	Ohio	44022	
Sen.	25	Kenny	Yuko	(D)	2022	479 Pierson Drive	Richmond Heights	Ohio	44143	

Office	District	First	Last	Party	Term Limit	Address	City	State	Zip	Zip plus 4
Sen.	26	Bill	Reineke	(R)	2028	5209 S. State Route 231	Tiffin	Ohio	44883	
Sen.	27	Kristina	Roegner	(R)	2026	1556 E. Hines Hill Road	Hudson	Ohio	44236	
Sen.	28	Vernon	Sykes	(D)	2024	133 Furnace Run Drive	Akron	Ohio	44307	
Sen.	29	Kirk	Schurring	(R)	2026	1817 Devonshire Drive NW	Canton	Ohio	44708	
Sen.	30	Frank	Hoagland	(R)	2024	5751 Township Road 120	Adena	Ohio	43901	
Sen.	31	Jay	Hottinger	(R)	2022	894 Jonathan Lane	Newark	Ohio	43055	
Sen.	32	Sandra	O'Brien	(R)	2028	3434 Stumpville Road	Rome	Ohio	44085	
Sen.	33	Michael	Rulli	(R)	2026	402 Lisbon Road	Salem	Ohio	44460	
US Rep.	1	Steve	Chabot	(R)		3025 Daytona Avenue	Cincinnati	Ohio	45211	
US Rep.	2	Brad	Wenstrup	(R)		512 Missouri Avenue	Cincinnati	Ohio	45226	
US Rep.	3	Joyce	Beatty	(D)		1421 Taylor Corners Circle	Blacklick	Ohio	43004	
US Rep.	4	Jim	Jordan	(R)		1709 S. State Route 560	Urbana	Ohio	43078	
US Rep.	5	Bob	Latta	(R)		1528 Muirfield Drive	Bowling Green	Ohio	43402	
US Rep.	6	Bill	Johnson	(R)		519 5th Street	Marietta	Ohio	45750	
US Rep.	7	Bob	Gibbs	(R)		13871 Township Road 473	Lakeville	Ohio	44638	
US Rep.	8	Warren	Davidson	(R)		18656 Pheasant Point Court	Troy	Ohio	45373	
US Rep.	9	Marcy	Kaptur	(D)		1841 Dority Road	Toledo	Ohio	43615	
US Rep.	10	Mike	Turner	(R)		109 N. Main Street Suite 1103	Dayton	Ohio	45402	
US Rep.	11	Shontel	Brown	(D)		4660 Belfiore Road	Cleveland	Ohio	44128	
US Rep.	12	Troy	Balderson	(R)		417 Coventry Circle	Zanesville	Ohio	43701	
US Rep.	13	Tim	Ryan	(D)		560 Ameber Drive SE	Warren	Ohio	44484	
US Rep.	14	David	Joyce	(R)		406 Deer Court	Chagrin Falls	Ohio	44022	
US Rep.	15	Mike	Carey	(R)		1017 City Park Avenue	Columbus	Ohio	43206	
US Rep.	16	Anthony	Gonzalez	(R)		1150 Homeland Drive	Rocky River	Ohio	44116	







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# Transcript of Blake Springhetti

**Date:** December 7, 2021

**Case:** League of Women Voters of Ohio, et al. -v- Ohio Redistricting Comm., et al.

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IN THE SUPREME COURT OF OHIO

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LEAGUE OF WOMEN :  
VOTERS OF OHIO, :  
et al., : Case Nos. 2021-1193  
Relators, : 2021-1198  
v. : 2021-1210  
OHIO REDISTRICTING :  
COMMISSION, et al., :  
Respondents. :  
- - - - - x

REMOTE VIDEOTAPED DEPOSITION of BLAKE SPRINGHETTI  
Tuesday, December 7, 2021  
2:31 p.m. CST

Job No.: 416827  
Pages: 1 - 111  
Reported By: Michelle M. Yohler, CSR, RMR, CRR

Transcript of Blake Springhetti  
Conducted on December 7, 2021

2

1 Videotaped deposition of BLAKE SPRINGHETTI,  
2 held remotely pursuant to notice before  
3 Michelle M. Yohler, CSR, RMR, CRR, a certified  
4 shorthand reporter, CSR No. 84-4531.

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A P P E A R A N C E S

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(Continued)

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10 Columbus, Ohio 43215

11 614.466.2872

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13  
14 ALSO PRESENT:

15 Mr. Frank Strigari, Senate Counsel

16 Mr. Ethan Rex, Technician

17 Ms. Madeline Nagy, Videographer

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Transcript of Blake Springhetti  
Conducted on December 7, 2021

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1	(Technician read-on.)	14:32:23
2	THE VIDEOGRAPHER: Here begins disk number	
3	one in the videotaped deposition of Blake	
4	Springhetti in the matter of League of Women	
5	Voters of Ohio versus Governor Mike DeWine,	
6	et al., in the Supreme Court of Ohio, Case No.	
7	2021-1449.	
8	Today's date is Tuesday, December 7th,	
9	2021, and the time on the video monitor is	
10	2:31 p.m.	
11	The videographer today is Madeline Nagy	
12	representing Planet Depos.	
13	This video deposition is taking place	
14	remotely.	
15	Would counsel please voice-identify	
16	themselves and state whom they represent.	
17	MS. BENDER: This is Brady Bender of	
18	Covington & Burling for the League of Women Voters	
19	Relators.	
20	MS. JASRASARIA: This is Jyoti Jasrasaria	
21	with Elias Law Group, LLP, for the Adams Relators.	14:32:25
22	MR. McGUIRE: This is Greg McGuire with	14:32:27
23	the Nelson Mullins firm for the Speaker and the	14:32:29
24	President of the Ohio General Assembly.	14:32:32
25	MS. COONTZ: This is the Bridget Coontz	14:32:36

Transcript of Blake Springhetti  
Conducted on December 7, 2021

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1 with the Ohio Attorney General's Office on behalf 14:32:37  
2 of Secretary of State Frank LaRose. With me is 14:32:40  
3 Mike Walton, and soon to be joining is Julie 14:32:42  
4 Pfeiffer. 14:32:45

5 MR. DENUYL: This is David Denuyl of 14:32:48  
6 Covington & Burling on behalf of the League of 14:32:49  
7 Women Voters as well. 14:32:51

8 MR. THOMSON: This is Alex Thomson of 14:32:55  
9 Covington & Burling on behalf of League of Women 14:32:55  
10 Voters Relators. 14:32:59

11 THE VIDEOGRAPHER: The court reporter 14:33:06  
12 today is Michelle Yohler, representing Planet 14:33:07  
13 Depos. 14:33:09

14 Will the reporter please swear in the 14:33:09  
15 witness.

16 (WHEREUPON, the witness was duly sworn.)

17 BLAKE SPRINGHETTI,  
18 called as a witness herein, having been first duly  
19 sworn, was examined and testified as follows:

20 EXAMINATION 14:33:33

21 BY MS. BENDER: 14:33:33

22 Q Good afternoon, Mr. Springhetti. Thank 14:33:33  
23 you for being here today. As I just said, my name 14:33:38  
24 is Brady Bender. I'm an attorney with Covington & 14:33:40  
25 Burling, and I'm representing the League of Women 14:33:45

Transcript of Blake Springhetti  
Conducted on December 7, 2021

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1 Voters Relators in this case. Later on you'll 14:33:47  
2 here from my colleague, Jyoti Jasrasaria, who will 14:33:50  
3 represent the Adams Relators. 14:33:55  
4 Would you please state your full name for 14:33:58  
5 the record. 14:33:59  
6 A Sure. Blake Victor Springhetti. 14:33:59  
7 Q Thank you. 14:34:02  
8 So I know that you were just deposed for a 14:34:02  
9 case related to the General Assembly map, and so 14:34:06  
10 if it's all right with you, I'm not going to 14:34:08  
11 repeat items or repeat basic ground rules that we 14:34:10  
12 covered there, given time constraints. 14:34:14  
13 Is that all right? 14:34:16  
14 MR. McGUIRE: That's fine. 14:34:19  
15 BY THE WITNESS: 14:34:20  
16 A Sure. 14:34:20  
17 BY MS. BENDER: 14:34:21  
18 Q Okay. All right. So I'm just going to 14:34:23  
19 jump right in then. Can you tell me, when did you 14:34:25  
20 start working on the congressional maps? 14:34:28  
21 A I would say sometime in mid to late 14:34:30  
22 October. 14:34:43  
23 Q Okay. And was that before you finished 14:34:43  
24 working on the state legislative maps? 14:34:50  
25 A No. 14:34:53

1 Q No. Okay. 14:34:54

2 So let's talk a little bit about the map 14:34:58

3 drawing process. Did you work with Ray DiRossi 14:35:01

4 again while working on the congressional maps? 14:35:04

5 A Could you clarify your question? 14:35:06

6 Q Did you -- during the General Assembly 14:35:10

7 redistricting process, I understand you had -- you 14:35:14

8 had worked with Mr. Ray DiRossi. Did you also 14:35:18

9 work with him while working on the state -- excuse 14:35:20

10 me -- on the congressional maps? 14:35:22

11 A I would say that we did not work in the 14:35:24

12 same manner that we did during the General 14:35:33

13 Assembly process. 14:35:35

14 Q I'm sorry, could you repeat that? I 14:35:35

15 didn't catch the end of that sentence. 14:35:37

16 A We did not work in the same manner as we 14:35:39

17 did in the congressional process as we did in the 14:35:42

18 General Assembly process. 14:35:45

19 Q Can you tell me, how did you work together 14:35:46

20 then? 14:35:49

21 A Well, for this process there were a lot of 14:35:57

22 other things happening other than congressional 14:36:00

23 redistricting and, frankly, we didn't spend much 14:36:03

24 time together discussing or deliberating 14:36:05

25 congressional maps throughout the process. 14:36:08

Transcript of Blake Springhetti  
Conducted on December 7, 2021

11

1	Q Okay. And just to backtrack a little bit.	14:36:12
2	Mr. DiRossi was working on drawing maps for the	14:36:15
3	Senate side?	14:36:18
4	A Yes, that's correct.	14:36:19
5	Q Okay. And you were working on the House	14:36:20
6	side?	14:36:22
7	A Correct.	14:36:22
8	Q And I understand that -- well, did you	14:36:25
9	work in the same room for the congressional maps	14:36:32
10	as you did while you were working on the General	14:36:34
11	Assembly maps?	14:36:40
12	A We used the same -- same state office	14:36:40
13	building that we used for the General Assembly	14:36:44
14	maps, yes.	14:36:46
15	Q Okay. And that was the William Green	14:36:47
16	Building?	14:36:49
17	A Yes.	14:36:49
18	Q Okay. Did you work in any other	14:36:50
19	locations.	14:36:59
20	A Could you clarify the question?	14:37:00
21	Q So I understand -- did you work on the	14:37:01
22	congressional maps from any locations beyond the	14:37:04
23	William Green Building?	14:37:08
24	A The Maptitude software was stationary in	14:37:15
25	the William Green Building.	14:37:18

Transcript of Blake Springhetti  
Conducted on December 7, 2021

12

1 Q So all of your Maptitude work would have 14:37:18  
2 taken place in the William Green Building, but 14:37:20  
3 potentially conversations or other things might 14:37:23  
4 have taken place outside of the William Green 14:37:25  
5 Building? 14:37:27

6 A Yes. 14:37:27

7 Q Okay. When you were in the William Green 14:37:27  
8 Building, did you and Mr. DiRossi work in the same 14:37:32  
9 room? 14:37:34

10 A Again, we worked in the same room in the 14:37:34  
11 same state office building, same state office that 14:37:41  
12 we used for the General Assembly process. 14:37:44

13 Q And just to clarify, I understood during 14:37:47  
14 the General Assembly process that both of you 14:37:50  
15 were -- your computers were in the same room, and 14:37:53  
16 that's also the case here in the William Green 14:37:56  
17 Building? 14:37:59

18 A Yes, the computers are in the same spot 14:37:59  
19 that they were during that process. 14:38:03

20 Q And so because you were working in the 14:38:05  
21 same room, you could simply talk to one another as 14:38:08  
22 you were drawing or as you were working? 14:38:11

23 A Could that happen, yes. But I'll just say 14:38:13  
24 that, again, it was very much not the same type of 14:38:19  
25 situation, just due to scheduling. He and I very 14:38:23

1 much were in passing. But, yes, that could 14:38:27  
2 happen. 14:38:31  
3 Q And it did happen sometimes? 14:38:31  
4 A Yes, it did happen sometimes. 14:38:33  
5 Q Did you and Mr. DiRossi communicate in any 14:38:37  
6 other ways about the congressional maps, beyond 14:38:43  
7 talking while you were in this room? 14:38:45  
8 A No. 14:38:50  
9 Q Okay. So no email? 14:38:50  
10 A There -- we exchanged bill drafts, yes. 14:38:54  
11 So we did exchange some emails related to drafting 14:39:02  
12 and block assignment files and things of that -- 14:39:06  
13 Q And would those emails have been provided 14:39:08  
14 to your counsel for this case? 14:39:10  
15 A I produced them. 14:39:11  
16 MS. BENDER: Okay. I just want to confirm 14:39:17  
17 that any such emails would have been produced to 14:39:18  
18 us and request that if they have not yet been 14:39:20  
19 produced to us, that they -- that they are 14:39:23  
20 produced imminently -- immediately after this 14:39:25  
21 deposition. 14:39:29  
22 MR. McGUIRE: All right. Yeah, I'm not 14:39:35  
23 aware of any documents responsive to your request 14:39:35  
24 for Mr. Springhetti that have not been produced. 14:39:37  
25 MS. BENDER: Okay. 14:39:39

Transcript of Blake Springhetti  
Conducted on December 7, 2021

14

1	BY MS. BENDER:	14:39:40
2	Q Would you communicate by text message?	14:39:41
3	A No.	14:39:42
4	Q And did you ever communicate using a	14:39:45
5	messaging app, like Teams or any other -- Zoom or	14:39:50
6	any other sort of messaging medium beyond text?	14:39:55
7	A No.	14:40:00
8	Q Okay. Did you and Mr. DiRossi ever share	14:40:00
9	any data with one another?	14:40:04
10	A Could you clarify what you mean by "data"?	14:40:09
11	Q So election -- election results data, for	14:40:11
12	instance.	14:40:17
13	A The data is -- so -- I don't understand.	14:40:17
14	Could you --	14:40:27
15	Q So I understand that there were partisan	14:40:27
16	election results that were used in the map drawing	14:40:31
17	process. Were those shared between the two of	14:40:34
18	you?	14:40:36
19	A So the -- the election data and the	14:40:37
20	election geography that we had in our systems	14:40:42
21	was -- at least on my system, was unchanged from	14:40:48
22	the General Assembly process.	14:40:54
23	Q Okay. And -- so you would have had the	14:40:56
24	same -- you -- the two of you would have had the	14:41:01
25	same data, and it would have been the same data	14:41:05

1 that you previously used in the General Assembly  
2 process? 14:41:06  
14:41:08

3 I guess I'll separate that out. The two 14:41:10  
4 of you would have had the same results data? 14:41:13

5 A What was in my computer was the same data 14:41:15  
6 and geography that was in my computer for the 14:41:21  
7 General Assembly process, and that remained 14:41:23  
8 unchanged. 14:41:25

9 Q Okay. But you're not sure if it would 14:41:25  
10 have been the same data that you would -- that 14:41:27  
11 Mr. DiRossi was using? 14:41:29

12 A I'm unsure of what all he may have or may 14:41:30  
13 not have had in his data view. 14:41:36

14 Q Okay. I believe earlier that you said you 14:41:37  
15 may have exchanged bill drafts. Would you ever -- 14:41:51  
16 or by email. Would you ever share map drafts, 14:41:54  
17 beyond what was just described in the bill? 14:42:02

18 A I don't recall sharing drafts of maps via 14:42:04  
19 email, no. 14:42:10

20 Q Okay. And would you ever view maps on 14:42:10  
21 each other's computers? 14:42:13

22 A Yes. 14:42:17

23 Q Okay. And would you have seen on 14:42:17  
24 Mr. DiRossi's computer the enacted map? 14:42:27

25 A Yes. 14:42:37

1 Q Okay. And would he have -- he would have 14:42:37  
2 seen, similarly, the House map that was proposed, 14:42:39  
3 the House Bill 479? 14:42:43  
4 A Could you rephrase that? There was a lag 14:42:46  
5 at the beginning of your question. 14:42:48  
6 Q That's okay. 14:42:48  
7 And he would have seen the House map that 14:42:49  
8 was proposed under House Bill 479? 14:42:51  
9 A I don't recall if he actually saw that or 14:42:55  
10 not. 14:42:59  
11 Q Okay. Was there anyone else that worked 14:42:59  
12 with you and Mr. DiRossi on the maps? 14:43:03  
13 A Could you clarify your question? 14:43:04  
14 Q Did anyone else work in Maptitude on maps 14:43:10  
15 proposed in the congressional cycle? 14:43:13  
16 A No. 14:43:16  
17 Q Did you consult with anyone else as you 14:43:16  
18 were drawing maps in Maptitude? 14:43:20  
19 A Could you clarify what you mean by 14:43:27  
20 "consult"? 14:43:30  
21 Q Let's -- well, I'll ask about some 14:43:30  
22 specific people, actually. 14:43:34  
23 So did you ever work or consult with John 14:43:35  
24 Morgan on maps that you were drawing in Maptitude? 14:43:40  
25 A No. 14:43:44

Transcript of Blake Springhetti  
Conducted on December 7, 2021

17

1	Q The same question as to Clark Benson?	14:43:44
2	A No.	14:43:50
3	Q Okay. I want to talk a little bit about	14:43:51
4	the data that you used in congressional map	14:44:02
5	drawing. Did you use census population data?	14:44:04
6	A Yes.	14:44:12
7	Q And did you use data on subdivision lines	14:44:12
8	in Ohio?	14:44:18
9	A Yes.	14:44:18
10	Q Okay.	14:44:22
11	A Yeah.	14:44:22
12	Q Where did that data come from?	14:44:25
13	A The 2020 census is where we received our	14:44:26
14	census population data.	14:44:35
15	Q And then what about the data on the	14:44:36
16	subdivision lines?	14:44:38
17	A Well, our Maptitude software came	14:44:39
18	with -- with subdivision lines.	14:44:46
19	Q Okay. And did you receive any data from	14:44:48
20	Ohio University?	14:44:57
21	A For the congressional process?	14:44:57
22	Q Mm-hm. That would have been used in the	14:45:03
23	congressional process.	14:45:05
24	A The data and the CURD, Common Unified	14:45:06
25	Redistricting Database, that was provided by OU in	14:45:17

1 the General Assembly process was maintained in 14:45:19  
2 Maptitude. 14:45:22

3 Q Okay. Did you use any data about voting 14:45:23  
4 history in drawing these maps? 14:45:32

5 A Yes. 14:45:35

6 Q And those would have been voting history 14:45:40  
7 based upon specific elections? 14:45:43

8 A Yes. 14:45:46

9 Q And which elections would you have used 14:45:46  
10 data from? 14:45:51

11 A So when I work -- when I would work on 14:45:58  
12 proposals for congressional redistricting, I would 14:46:01  
13 specifically look at '16, '18, and '20 election 14:46:04  
14 data. 14:46:09

15 Q Any years beyond that? 14:46:09

16 A Not in particular. 14:46:10

17 Q I'm sorry, not in particular? No years 14:46:13  
18 beyond that or -- can you clarify that answer? 14:46:20

19 A Sure. 14:46:24  
20 When I was drafting congressional 14:46:25  
21 proposals, I was looking at '16, '18, and '20 14:46:26  
22 data. I did not -- 14:46:32

23 Q Okay. And which -- 14:46:33

24 A -- reference -- I did not reference any 14:46:34  
25 years prior to that. 14:46:36

1 Q Okay. And which elections from 2016, 14:46:37  
2 2018, and 2020? 14:46:46

3 A Statewide, federal elections, and 14:46:47  
4 Ohio-elected office holders, statewide office 14:46:58  
5 holders. 14:47:10

6 Q I'm sorry. If you could -- if you could 14:47:10  
7 just repeat the end of that again. I couldn't 14:47:10  
8 quite catch the -- I couldn't quite hear you. 14:47:11

9 A Yes. Statewide elections including state 14:47:11  
10 office holders, statewide office holders, and 14:47:15  
11 federal elections. 14:47:21

12 Q Okay. And those statewide office holders 14:47:21  
13 would be -- can you name those offices? 14:47:25

14 A Sure. Secretary of State, Treasury of 14:47:27  
15 State -- I'm sorry, Treasurer of State, the 14:47:32  
16 Attorney General, the -- who am I leaving out? 14:47:38  
17 Auditor, Treasurer, Secretary of State, Governor. 14:47:42

18 Q All right. Auditor, Treasurer, Secretary 14:47:47  
19 of State, Governor. Good. 14:47:52

20 Unless you can -- unless you can think of 14:47:54  
21 anyone else that is not on there. 14:47:56

22 A Attorney General? 14:47:58

23 Q Oh, AG. Yeah. Okay. We'll add that. 14:48:01

24 And where did this election -- sorry. I 14:48:04  
25 missed that. 14:48:09

1 A Yeah, it's all good. 14:48:10

2 Q Where did the election data you used come 14:48:11  
3 from? 14:48:13

4 A The -- the election data comes from the 14:48:13  
5 Secretary of State's Office. 14:48:20

6 Q Okay. And was it -- was it processed by 14:48:23  
7 anyone beyond -- or was the state -- the election 14:48:31  
8 data that you get from the Secretary of State's 14:48:38  
9 Office, was it then processed by anyone else to 14:48:40  
10 reveal partisan voting preferences from that data? 14:48:43

11 A So as I stated earlier, the data and the 14:48:50  
12 information that was in my Maptitude computer was 14:48:56  
13 unchanged from the General Assembly and the 14:48:59  
14 redistricting process. 14:49:01

15 I did not manage that process for the 14:49:02  
16 General Assembly process as far as re- -- 14:49:07  
17 obtaining data and things like that. 14:49:12

18 So my computer was unchanged from the 14:49:14  
19 General Assembly process. 14:49:18

20 Q Okay. And when was it decided which 14:49:21  
21 elections you would consider voting data from in 14:49:30  
22 this process? 14:49:33

23 A I'm sorry, could you restate the question? 14:49:34

24 Q When was it decided which elections you 14:49:44  
25 would consider voting data from in this process? 14:49:47

Transcript of Blake Springhetti  
Conducted on December 7, 2021

21

1	A I would say probably the second week of	14:49:50
2	November.	14:49:59
3	Q And prior to that, you might have been	14:50:02
4	considering other data as well?	14:50:05
5	A Yes.	14:50:07
6	Q And what other data might you have been	14:50:08
7	considering or were you considering?	14:50:17
8	A So up until that point, I was considering	14:50:21
9	the data that I mentioned, '16, '18, and '20	14:50:26
10	statewide elections.	14:50:30
11	Q Okay. And then at that point, you were no	14:50:34
12	longer considering -- at that point, you narrowed	14:50:37
13	it down to which elections again?	14:50:40
14	A So, again, I -- when I was actually	14:50:42
15	drafting maps, I -- that's what I considered.	14:50:47
16	Q Okay. So, actually, throughout the entire	14:50:52
17	period you were considering 2016, 2018, and 2020	14:50:56
18	statewide elections?	14:51:00
19	A Yes.	14:51:01
20	Q Okay. And that's both state and federal	14:51:01
21	elections?	14:51:04
22	A Yes.	14:51:07
23	Q And who decided which elections would be	14:51:07
24	considered?	14:51:13
25	MR. McGUIRE: Objection, we're going to	14:51:16

1 assert the legislative privilege. 14:51:19  
2 Mr. Springhetti's communications with any members 14:51:20  
3 of the General Assembly are an integral part of 14:51:22  
4 the deliberative and communicative process of the 14:51:26  
5 work of the General Assembly. 14:51:29  
6 So to the extent that answer involves 14:51:31  
7 anybody who was in -- either in the General 14:51:33  
8 Assembly or on their staffs, don't answer that 14:51:35  
9 question. If it's somebody else, you can answer 14:51:37  
10 the question, someone outside that group. 14:51:39  
11 BY MS. BENDER: 14:51:46  
12 Q Can you provide an answer, 14:51:47  
13 Mr. Springhetti, given that instruction? 14:51:49  
14 A Yeah, that was an internal discussion. 14:51:50  
15 Q Okay. 14:51:53  
16 MS. BENDER: So I'd just like to say, as I 14:51:54  
17 said -- or as we've said before, I find -- we find 14:51:57  
18 these objections improper. We don't believe that 14:52:01  
19 this is covered by legislative privilege. And for 14:52:03  
20 the sake of time, we will move on. 14:52:05  
21 Let me make sure that I'm on track. 14:52:13  
22 BY MS. BENDER: 14:52:22  
23 Q So do you know how it was decided which 14:52:22  
24 elections you would consider? 14:52:25  
25 MR. McGUIRE: Once again, I'll assert the 14:52:26

1 legislative privilege to the extent that answer 14:52:28  
2 would involve him identifying members of the 14:52:30  
3 General Assembly or members of their staff. 14:52:33  
4 BY THE WITNESS: 14:52:33  
5 A I do not know how it was considered. 14:52:42  
6 MS. BENDER: And I'll say, the same 14:52:46  
7 response to the objection as before. 14:52:49  
8 BY MS. BENDER: 14:52:50  
9 Q Did you ever participate in any meetings 14:52:54  
10 about what election data would be considered? 14:52:55  
11 A I'm sorry, could you restate that? There 14:52:57  
12 was another lag at the beginning. 14:53:04  
13 MR. McGUIRE: You're breaking up a little 14:53:05  
14 bit occasionally. 14:53:07  
15 MS. BENDER: Oh, sorry about that. 14:53:09  
16 BY MS. BENDER: 14:53:10  
17 Q Did you ever participate in any meetings 14:53:11  
18 about what data would be considered? 14:53:13  
19 A Yes. 14:53:15  
20 Q And who would participate in these 14:53:16  
21 meetings? 14:53:23  
22 A It would have been myself and the Speaker 14:53:23  
23 and the Senate President and Ray and our -- my 14:53:29  
24 Chief of Staff and Ray's Chief of Staff. 14:53:35  
25 Q And can you give names for the chiefs of 14:53:39

1 staff there? 14:53:42

2 A The Ohio House Chief of Staff is Christine 14:53:43

3 Morrison. The Senate Chief of Staff is John 14:53:47

4 Barron. 14:53:52

5 Q All right. So once the election data was 14:53:52

6 received, it was loaded into Maptitude. I believe 14:53:58

7 you said earlier that you weren't sure how that 14:54:00

8 happened; is that right? 14:54:03

9 A The management and facilitation of 14:54:06

10 obtaining the data was not something that I 14:54:13

11 managed for the General Assembly process. And 14:54:16

12 I'll just say again that the data and geography 14:54:19

13 that was in my computer then was unchanged for the 14:54:21

14 congressional districts. 14:54:24

15 Q So you don't know how the election results 14:54:25

16 data was -- got into Maptitude? 14:54:30

17 A For the congressional process? 14:54:32

18 Q Just in general. It sounds like it was 14:54:34

19 the same data either way. 14:54:37

20 A Yeah, so for the General Assembly process, 14:54:40

21 we had to upload it to Maptitude, but I was not 14:54:47

22 involved in the attainment of that data. 14:54:50

23 Q Okay. Do you know who uploaded it into 14:54:52

24 Maptitude? 14:54:55

25 A For the General Assembly process? 14:54:55

1 Q So I understand that this is the same data 14:54:58  
2 that's being used in the congressional process. 14:55:03  
3 So it was uploaded at the time of the General 14:55:04  
4 Assembly process, correct, but it's the same data? 14:55:07  
5 A Yes, it was uploaded for the General 14:55:12  
6 Assembly process, and it is -- 14:55:14  
7 Q Okay. 14:55:14  
8 A -- the same data. 14:55:15  
9 Q And then -- so who uploaded it for the 14:55:16  
10 General Assembly process? 14:55:18  
11 A I physically up- -- put all the 14:55:19  
12 information into Maptitude. 14:55:22  
13 Q And who did you get that information from? 14:55:24  
14 A So, again, I didn't manage that process. 14:55:26  
15 I actually got that from Ray. 14:55:33  
16 Q Okay. And do you know who Ray got it 14:55:36  
17 from? 14:55:38  
18 A I don't know who sent -- who sent it to 14:55:38  
19 Ray, no. 14:55:43  
20 Q Okay. Once it was in Maptitude, you could 14:55:44  
21 view this -- you could view this election data 14:55:49  
22 alongside the map that you were drawing; is that 14:55:52  
23 right? 14:55:54  
24 A Yes. I had two screens. One had data -- 14:55:54  
25 a data view on it. The other side has a, what I 14:56:03

1 call, a canvass. 14:56:06

2 Q I'm going to dig in a little bit more on 14:56:08

3 that maybe later. But before we get to that, I 14:56:14

4 wanted to ask about your reporting. 14:56:18

5 Who did you report to regarding your work 14:56:20

6 on congressional redistricting? 14:56:21

7 A The Speaker of the House. 14:56:25

8 Q And how did you report to him? 14:56:26

9 MR. MCGUIRE: I'm sorry, objection to the 14:56:34

10 form. 14:56:35

11 Is the question what means of 14:56:35

12 communication did he use? 14:56:37

13 MS. BENDER: Yes. 14:56:40

14 BY MS. BENDER: 14:56:40

15 Q What means did you use? 14:56:41

16 A We physically met and discussed 14:56:42

17 congressional redistricting. 14:56:55

18 Q And where would you meet? 14:56:55

19 A We would meet in the congressional 14:56:56

20 redistrict -- well, in the redistricting office, 14:57:02

21 and we would also meet in the Riffe Center, and we 14:57:04

22 would also meet in the State House. 14:57:08

23 Q Okay. So the State House, the -- I missed 14:57:10

24 that second one. What center? What center? 14:57:12

25 A The Riffe Center. 14:57:15

1 Q Okay. And then the -- in the 14:57:16  
2 redistricting office, which was the office in the 14:57:21  
3 Green Building? 14:57:24  
4 A Yes. And just so you know, the Riffe 14:57:24  
5 Center is where the Ohio House office -- offices 14:57:27  
6 are. 14:57:31  
7 Q Okay. Great. Thank you. Sorry. I'm not 14:57:32  
8 familiar with all the names of the buildings. 14:57:34  
9 A Yeah. 14:57:37  
10 Q And did you ever report to him in any 14:57:37  
11 manner other than in person in one of these 14:57:44  
12 buildings? 14:57:48  
13 A No. 14:57:48  
14 Q Okay. So no -- not by phone? 14:57:52  
15 A Yeah, I don't recall us ever talking about 14:57:59  
16 congressional redistricting without us physically 14:58:01  
17 being in the same -- in the same room. 14:58:03  
18 Q So just to -- I'll just confirm then. So 14:58:06  
19 not by email? 14:58:10  
20 A Yeah, I don't -- I don't recall ever 14:58:10  
21 sending an email about congressional 14:58:15  
22 redistricting. 14:58:17  
23 Q Or text? 14:58:17  
24 A Or text. 14:58:18  
25 Q Okay. So when you met in person 14:58:20

1 sometimes in -- sometimes in the state legislative 14:58:31  
2 building, sometimes in the Green Building, when 14:58:33  
3 you met in the Green Building, in particular, 14:58:34  
4 would you sometimes show Speaker Cupp the map that 14:58:36  
5 you were working on? 14:58:39

6 A I would, yes. 14:58:40

7 Q Okay. And would you show it to him on 14:58:47  
8 your computer? 14:58:49

9 A Yes. 14:58:49

10 Q Okay. And did you ever show it to him in 14:58:49  
11 physical copy? 14:58:52

12 A Yeah. 14:58:52

13 Q Okay. And have those -- those maps that 14:58:57  
14 you provided to Speaker Cupp in physical copy been 14:59:05  
15 produced to your counsel in this case? 14:59:08

16 A So those are in Maptitude. So I have -- I 14:59:10  
17 have them. I don't have physical printouts, no. 14:59:16

18 Q But you provided physical printouts to 14:59:20  
19 Speaker Cupp? 14:59:23

20 A Yes. 14:59:25

21 Q And those are smart-retained? 14:59:27

22 A So I have -- I have those files. I 14:59:31  
23 just -- 14:59:35

24 Q The physical -- 14:59:35

25 A They're not -- 14:59:36

1	Q -- copies?	14:59:37
2	A -- they're not letter-sized paper, so	14:59:38
3	they're not particularly easy to turn over.	14:59:41
4	Q Okay. Well, we just want to make sure	14:59:43
5	that any physical copies that have been -- or that	14:59:47
6	were provided are produced, even if not in	14:59:50
7	letter-size paper. They could be scanned in or --	14:59:54
8	or something of the like and produced to us in	14:59:59
9	this case.	15:00:01
10	A Yeah.	15:00:04
11	MR. MCGUIRE: I mean, if that's -- you're	15:00:06
12	seeking a response from me, Ms. Bender, again, I	15:00:07
13	am not -- I was not involved in the collection of	15:00:11
14	documents from anyone in the production of them.	15:00:13
15	I certainly have not been advised and I am not	15:00:16
16	aware of anything responsive to the request that	15:00:18
17	was not produced.	15:00:21
18	BY MS. BENDER:	15:00:26
19	Q Okay. And did you provide reports on the	15:00:27
20	-- your map drawing to anyone besides Speaker	15:00:30
21	Cupp?	15:00:33
22	A Yes.	15:00:33
23	Q Who else?	15:00:40
24	A So could you clarify what you mean by	15:00:41
25	"reports," just so I can accurately answer the	15:00:47

1 question. 15:00:49

2 Q I understand as you're drawing maps, you 15:00:49

3 would be updating others on your progress or 15:00:55

4 providing them with details about the maps that 15:01:02

5 you were drawing, the general sort of definition 15:01:04

6 of reports or what you would think of when you 15:01:08

7 think of a report. 15:01:12

8 A Sure. Sure. Well, I didn't know if you 15:01:12

9 meant something other than just general 15:01:14

10 correspondence. 15:01:16

11 So, yeah, I would -- I would generally 15:01:17

12 correspond with the Speaker, and I would generally 15:01:19

13 correspond with our Chief of Staff. 15:01:22

14 Q Okay. And anyone else? 15:01:24

15 A No. 15:01:32

16 Q So you never reported to Representative 15:01:32

17 Oelslager? 15:01:37

18 A Not in developing of any maps, no. 15:01:37

19 Q Okay. Was there a -- did you report to 15:01:41

20 him about anything else? 15:01:47

21 A I reported to him about a congressional 15:01:48

22 plan that was completed. 15:01:53

23 Q Okay. So while he was not -- while you 15:01:55

24 were not in communication -- it sounds like you 15:01:58

25 were not in communication during the process of 15:02:02

1 the map drawing, but there -- but at the end 15:02:04  
2 before he -- before it was -- before the map was 15:02:05  
3 proposed, at that point, you reported to him? 15:02:08  
4 A I did show him a congressional plan that 15:02:14  
5 was completed, yes. 15:02:18  
6 Q And was that the -- what was introduced as 15:02:18  
7 House Bill 479? 15:02:24  
8 A Yes. 15:02:25  
9 Q Okay. And what -- or how did that 15:02:25  
10 report -- or that -- or how did that take place? 15:02:37  
11 What was the means of communication there? 15:02:40  
12 A I physically met with Chairman Oelslager. 15:02:41  
13 Q Okay. And did you show him the map at 15:02:46  
14 that time? 15:02:48  
15 A I did. 15:02:48  
16 Q And did you show it to him on your 15:02:51  
17 computer? 15:02:53  
18 A I did not. 15:02:54  
19 Q How did you show it to him? 15:02:57  
20 A I showed him a printout of -- of the map. 15:02:58  
21 Q Okay. And was there information 15:03:07  
22 accompanying the printout? 15:03:09  
23 A No. 15:03:10  
24 Q And did you convey to him any information 15:03:17  
25 beyond the -- did you provide him any additional 15:03:19

1 details on the map beyond the actual image at that 15:03:24  
2 time? 15:03:29  
3 MR. McGUIRE: Objection, we'll assert the 15:03:29  
4 legislative privilege. 15:03:32  
5 Don't answer that question, please. 15:03:34  
6 MS. BENDER: Again, the same answer as 15:03:37  
7 before, we don't believe these are covered by the 15:03:40  
8 legislative privilege, but we will move on. 15:03:42  
9 BY MS. BENDER: 15:03:44  
10 Q Did you talk to anyone else about your 15:03:46  
11 work on redistricting beyond the individuals we've 15:03:48  
12 already discussed? 15:03:50  
13 A Yes. 15:03:56  
14 Q Who else? 15:03:56  
15 A I talked to two other members of the 15:03:56  
16 General Assembly. 15:04:03  
17 Q And who is that? 15:04:03  
18 A Representative Swearingen and 15:04:03  
19 Representative Welker (phonetic). 15:04:08  
20 Q And what did you talk to them about? 15:04:13  
21 MR. McGUIRE: Objection. Raise the 15:04:15  
22 legislative privilege. 15:04:17  
23 Don't answer that question. 15:04:19  
24 BY MS. BENDER: 15:04:21  
25 Q Did you show them any maps? 15:04:21

1           A I did not show them any maps as I was           15:04:23  
2           drafting proposals, no, I did not.           15:04:33  
3           Q And did they come to the Green Building?           15:04:36  
4           A Representative Swearingen came to the           15:04:41  
5           Green Building.           15:04:50  
6           Q Okay. So beyond -- beyond that and           15:04:50  
7           Speaker Cupp, did anyone else come to the Green           15:04:58  
8           Building?           15:05:01  
9           A Well, the other people that I had already           15:05:01  
10          mentioned that came to the Green Building were           15:05:06  
11          obviously there, but other than -- than those           15:05:10  
12          people, no.           15:05:13  
13          Q Okay. I'm sorry. I'm going to -- I           15:05:13  
14          apologize if we've already covered this, but it's           15:05:16  
15          hard to keep all the details straight in my head.           15:05:19  
16          If you wouldn't mind just reminding me who those           15:05:21  
17          people were.           15:05:25  
18          A Sure.           15:05:26  
19                  So a meeting that you previously asked a           15:05:26  
20          question about --           15:05:28  
21          Q Sorry about that --           15:05:29  
22          A -- the meeting was myself, Ray DiRossi;           15:05:31  
23          the Speaker; the President; my Chief of Staff,           15:05:37  
24          Christine Morrison; the Senate Chief of Staff,           15:05:42  
25          John Barron. And --           15:05:46

1 Q Okay. Okay. 15:05:47

2 A -- in addition to that, there was 15:05:48

3 subsequent -- there was a subsequent period of 15:05:50

4 time where Representative Swearingen came to the 15:05:52

5 Green Building. 15:05:56

6 Q Okay. And that was the meeting that we 15:05:57

7 talked about where you -- or where -- I believe 15:06:02

8 that was the meeting discussing election -- which 15:06:10

9 election results were considered -- might be 15:06:13

10 considered? 15:06:15

11 MR. McGUIRE: Objection to the form. 15:06:17

12 Which meeting? The meeting with 15:06:20

13 Representative Swearingen or the meeting that he 15:06:23

14 described with -- 15:06:25

15 MS. BENDER: Oh, the meeting with the 15:06:26

16 group, including DiRossi, the Speaker, the 15:06:27

17 President, and the Chief of Staff. 15:06:30

18 MR. McGUIRE: Oh, objection, legislative 15:06:31

19 privilege. 15:06:33

20 MS. BENDER: Okay. 15:06:34

21 BY MS. BENDER: 15:06:35

22 Q Did those individuals come to the Green 15:06:35

23 Building on any other occasions? 15:06:38

24 A So could you clarify at this point what 15:06:39

25 individuals you're referencing. 15:06:45

1 Q Any of Ray DiRossi, Speaker Cupp, Senate 15:06:46  
2 President Huffman, or the Chiefs of Staff, 15:06:52  
3 Christine Morrison or John Barron? 15:06:56  
4 A Yeah, I -- I can't -- I can't -- I would 15:06:59  
5 be speculating if I -- if I answered for anyone -- 15:07:02  
6 anyone other than the Speaker and Christine. So 15:07:05  
7 I'll say that, yes, the Speaker and Christine came 15:07:09  
8 to the Green other than -- to the Green Building 15:07:13  
9 other than that meeting. 15:07:17  
10 Q Okay. But you can't remember an 15:07:18  
11 occasion -- occasions on which Senate President 15:07:20  
12 Huffman came to the Green Building beyond that 15:07:23  
13 meeting? 15:07:25  
14 A Correct. Yeah, I would be speculating on 15:07:25  
15 it. I don't know when he may or may not have been 15:07:31  
16 there. Because, again, I wasn't always there. 15:07:34  
17 Q Okay. All right. Then we will -- oh, 15:07:36  
18 actually, one more thing. 15:07:41  
19 Did you ever work on any written analyses 15:07:43  
20 of maps? 15:07:45  
21 A Yes. 15:07:52  
22 Q And what maps were those analyzing? 15:07:52  
23 A The as-introduced version of House 15:07:54  
24 Bill 479 and the as-introduced version of the -- I 15:08:09  
25 don't recall the bill number, but the House 15:08:16

1 Democrat proposal, House Democrat caucus proposal, 15:08:19  
2 and ultimately the final map. 15:08:25  
3 Q And those would have been produced to your 15:08:26  
4 counsel, correct? 15:08:30  
5 A I -- yeah, I produced those. 15:08:30  
6 Q Okay. 15:08:37  
7 MS. BENDER: And, Counsel, again, I would 15:08:37  
8 ask that any of those that have not been produced 15:08:39  
9 are produced to us, and I will move along. 15:08:42  
10 Sorry. Were you going to say something? 15:08:59  
11 MR. McGUIRE: No, just I understand what 15:09:01  
12 you're saying. I know of nothing again responsive 15:09:03  
13 that's not objectionable that hasn't been produced 15:09:05  
14 to you. 15:09:08  
15 MS. BENDER: Okay. So it sounds like 15:09:08  
16 there may be certain of those analyses that have 15:09:09  
17 been withheld under an objection. 15:09:13  
18 MR. McGUIRE: I don't know that. I'm just 15:09:16  
19 saying I -- that would be the only -- one of the 15:09:18  
20 few reasons I could think that responsive 15:09:20  
21 documents would not have been produced. 15:09:23  
22 MS. BENDER: Okay. 15:09:27  
23 BY MS. BENDER: 15:09:28  
24 Q All right. So I want to talk a little bit 15:09:28  
25 about the map that was introduced as House 15:09:30

1 Bill 479 that we discussed earlier. 15:09:34

2 You were the creator of that map, correct? 15:09:40

3 A I physically drafted the map in Maptitude, 15:09:42

4 yes. 15:09:47

5 Q Okay. Did anyone else contribute to 15:09:47

6 making that map? 15:09:48

7 A Could you clarify the question? 15:09:49

8 Q Did anyone else have any input as you were 15:09:51

9 creating that map? 15:09:54

10 A Yes. 15:09:55

11 Q And who would that be? 15:09:56

12 A The Speaker. 15:09:58

13 Q And anyone else? 15:10:00

14 A No. 15:10:01

15 Q And what was the Speaker's role in 15:10:08

16 creating that map? 15:10:09

17 MR. McGUIRE: Objection, legislative 15:10:10

18 privilege. 15:10:12

19 Don't answer. 15:10:12

20 MS. BENDER: Okay. 15:10:15

21 BY MS. BENDER: 15:10:15

22 Q Did anyone provide feedback on that map? 15:10:16

23 A Yes. 15:10:19

24 Q And who would have provided feedback on 15:10:23

25 that map? 15:10:26

1           A Well, there -- just to name some, I -- the           15:10:26  
2 public provided significant feedback --           15:10:31  
3           Q Aside from the public --           15:10:35  
4           A -- through various -- through various           15:10:37  
5 hearings.           15:10:39  
6           Q Aside from the public. Sorry for           15:10:40  
7 interrupting there.           15:10:42  
8           A No, I don't recall any -- any specific           15:10:43  
9 feedback other than just me tuning into public           15:10:57  
10 hearings and seeing what the public had to say           15:11:01  
11 about it and reading publicly available           15:11:05  
12 newspapers.           15:11:09  
13           Q Did you ever provide any public testimony           15:11:09  
14 on the map?           15:11:12  
15           A I did not give public testimony, no.           15:11:12  
16           Q And why not?           15:11:18  
17           A I was -- I was not instructed by the           15:11:18  
18 Speaker to give public testimony. It's not common           15:11:26  
19 for a legislative staff person to give testimony           15:11:29  
20 on something.           15:11:33  
21           Q Okay. But in the General Assembly           15:11:34  
22 process, there was public testimony on the map --           15:11:38  
23 or on maps introduced, correct?           15:11:41  
24           A Yes.           15:11:43  
25           Q Okay. Were you involved in drawing the           15:11:46

1	map that was originally introduced by Senator	15:11:50
2	McColley in the Senate?	15:11:53
3	A No.	15:11:55
4	Q Had you seen that map ahead of it being	15:11:56
5	introduced?	15:12:01
6	A I don't -- I don't think I saw the final	15:12:02
7	map before it was introduced.	15:12:07
8	Q Okay. Did you ever discuss that map with	15:12:10
9	anyone?	15:12:11
10	A Ray DiRossi.	15:12:12
11	Q Anyone else?	15:12:19
12	A The Speaker.	15:12:19
13	Q Okay. And when would you have discussed	15:12:27
14	that map with Ray DiRossi?	15:12:30
15	A After it was introduced.	15:12:39
16	Q Do you have any more detailed time than	15:12:40
17	that, you know, the day it was introduced, the day	15:12:42
18	after?	15:12:46
19	A Yeah, so I -- there's a legislative record	15:12:47
20	on when it was introduced. I would say that	15:12:51
21	shortly -- like, the day after it was introduced,	15:12:54
22	we had discussion about it.	15:12:57
23	Q Okay. And what did you discuss?	15:12:59
24	MR. McGUIRE: Objection, legislative	15:13:02
25	privilege.	15:13:03

Transcript of Blake Springhetti  
Conducted on December 7, 2021

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1 MS. BENDER: Okay. And the same responses 15:13:04  
2 as before. 15:13:05  
3 BY MS. BENDER: 15:13:06  
4 Q With Speaker Cupp, when did you discuss 15:13:09  
5 that map with him? 15:13:10  
6 A I would be speculating at this point on -- 15:13:11  
7 on the -- 15:13:18  
8 Q But it was after that -- after it was 15:13:18  
9 introduced? 15:13:21  
10 A Yes, I did not see the final version of 15:13:22  
11 that. 15:13:25  
12 Q Okay. 15:13:28  
13 A I didn't see that final product. I wasn't 15:13:29  
14 sure what Senator McColley was going to introduce. 15:13:32  
15 Q Okay. And were you involved in drawing 15:13:35  
16 the substitute map that Senator McColley 15:13:36  
17 introduced that was ultimately enacted? 15:13:39  
18 A I did not physically draw that map. 15:13:41  
19 Q Were you involved in the drawing at all? 15:13:47  
20 A No. 15:13:51  
21 Q Had you seen that map before it was 15:13:53  
22 introduced -- 15:13:56  
23 A Yes. 15:13:57  
24 Q -- in its final form? 15:13:59  
25 Yes. Okay. 15:14:01

Transcript of Blake Springhetti  
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1	And when did you see that map?	15:14:01
2	A I first saw that map on November 9th.	15:14:09
3	Q Okay. And did you discuss that map with	15:14:12
4	anyone?	15:14:14
5	A Yes.	15:14:14
6	Q And with who? Who did you discuss it	15:14:19
7	with?	15:14:22
8	A The Speaker, the Senate President, Ray	15:14:22
9	DiRossi, John Barron, and Christine Morrison.	15:14:27
10	Q And were those separate conversations?	15:14:31
11	A There was -- there was one discuss- -- one	15:14:36
12	main discussion on November 9th about that map	15:14:42
13	before it was introduced.	15:14:47
14	Q And who was there at that discussion?	15:14:48
15	A The names that I just -- that I just	15:14:50
16	mentioned.	15:14:54
17	Q Okay. All of those folks.	15:14:54
18	And what was discussed at that meeting?	15:14:55
19	MR. MCGUIRE: Objection, legislative	15:14:59
20	privilege.	15:15:01
21	MS. BENDER: Okay. The same response as	15:15:03
22	before. Again, we don't believe that these are	15:15:05
23	covered by the legislative privilege, and we will	15:15:07
24	move on.	15:15:10
25		

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1	BY MS. BENDER:	15:15:10
2	Q Did you have individual conversations with	15:15:15
3	any of those individuals about that map?	15:15:16
4	A Could you -- could you restate the	15:15:22
5	question.	15:15:24
6	Q Did you have individual conversations with	15:15:25
7	any of those individuals about the map?	15:15:26
8	A Yes.	15:15:31
9	Q And when would those -- or who would those	15:15:31
10	be with?	15:15:34
11	A We had discussions, obviously individual	15:15:35
12	discussions, with the Speaker and my Chief of	15:15:42
13	Staff. And then there were -- also there were	15:15:46
14	some subsequent meetings and discussions about	15:15:48
15	that map.	15:15:52
16	Q And when would you have talked with the	15:15:53
17	Speaker?	15:15:56
18	A Throughout the process, you know, after	15:15:57
19	November -- November 9th.	15:16:04
20	Q So multiple times thereafter?	15:16:06
21	A Yes.	15:16:08
22	Q Okay. And were you involved in drawing	15:16:10
23	any other maps that I haven't mentioned?	15:16:13
24	A Could you clarify your question?	15:16:19
25	Q Did you work on any maps beyond House --	15:16:21

1 House Bill 7- -- or 479 and the two maps which 15:16:26  
2 you've -- were introduced in the Senate that you 15:16:29  
3 said you did not work on? 15:16:32  
4 A Yes. 15:16:33  
5 Q And did you produce Maptitude files for 15:16:33  
6 those maps to your counsel? 15:16:39  
7 A I did not provide any Maptitude -- 15:16:41  
8 Maptitude files. 15:16:50  
9 Q You did not provide any Maptitude files to 15:16:51  
10 your counsel? 15:16:54  
11 A No. 15:16:55  
12 Q I believe that we have Maptitude files 15:17:00  
13 from you, but those -- you say now that those were 15:17:04  
14 not provided by you? 15:17:10  
15 A I'm sorry. You have block assignment 15:17:12  
16 files, but I don't -- I don't know what else you 15:17:15  
17 mean other than block assignment files. 15:17:19  
18 Q Okay. We'll get to that in a little 15:17:23  
19 while. 15:17:26  
20 Let's talk about how Maptitude works. 15:17:26  
21 When you were drawing -- or you created multiple 15:17:34  
22 maps with Maptitude; is that right? You just said 15:17:38  
23 there were -- there was more than one? 15:17:42  
24 A Yes. 15:17:44  
25 Q Okay. And those maps, I think you agreed 15:17:44

1 earlier, were shared with people that you reported 15:17:49  
2 to? 15:17:51  
3 A No. Not all of them, no. 15:17:53  
4 Q Not all of them. But House Bill 479, for 15:17:55  
5 instance, was shared with people that you reported 15:18:00  
6 to? 15:18:02  
7 A Yes. 15:18:03  
8 Q Okay. And potentially other maps? 15:18:03  
9 A Yes. 15:18:06  
10 Q Okay. And when you shared those maps, you 15:18:07  
11 would share some information about them as well? 15:18:13  
12 A Could you clarify what you mean? 15:18:15  
13 Q Would you share information, for instance, 15:18:21  
14 on the map's partisan performance? 15:18:23  
15 MR. McGUIRE: Objection, legislative 15:18:26  
16 privilege. 15:18:28  
17 MS. BENDER: Again, I do not believe that 15:18:29  
18 is covered by legislative privilege, but we will 15:18:31  
19 move on. 15:18:35  
20 BY MS. BENDER: 15:18:49  
21 Q When you shared the maps -- I believe 15:18:50  
22 we've talked about some instances already in which 15:18:51  
23 you've shared the maps. Did you ever share any 15:18:53  
24 maps by -- in digital copy? 15:18:55  
25 A No. 15:19:00

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Conducted on December 7, 2021

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1	Q	Okay. And I think we talked about maps	15:19:01
2		that had been printed out before. So you have	15:19:06
3		shared maps in printout, but --	15:19:11
4	A	I have --	15:19:15
5	Q	-- with the Speaker I think we talked	15:19:16
6		about before?	15:19:17
7	A	Yeah, there was a map that I shared via	15:19:17
8		printout, but, you know, the others that were	15:19:21
9		shared, I showed directly on Maptitude.	15:19:23
10	Q	Okay. And when you showed -- or shared	15:19:27
11		those directly on Maptitude, can you tell me -- it	15:19:33
12		sounds like those were shared -- that was shared	15:19:40
13		with the Speaker?	15:19:42
14	A	Yes.	15:19:43
15	Q	With -- never with Representative	15:19:45
16		Oelslager?	15:19:52
17	A	Correct.	15:19:52
18	Q	Ever with Senator Huffman?	15:19:54
19	A	I don't -- I don't recall ever showing	15:19:59
20		anything to President Huffman directly on my	15:20:05
21		computer.	15:20:08
22	Q	Okay. What about Senator McColley?	15:20:08
23	A	No.	15:20:10
24	Q	And with Christine Morrison?	15:20:11
25	A	Yes, I showed her things directly on my	15:20:15

1 computer. 15:20:22

2 Q And anyone else? 15:20:22

3 A Ray DiRossi. 15:20:24

4 Q Okay. Anyone beyond that? 15:20:26

5 A No. 15:20:28

6 Q Okay. So digging in on how Maptitude 15:20:33

7 works. When you use Maptitude, you see a map of 15:20:36

8 the state of Ohio with individual districts 15:20:42

9 represented on the map of state of -- on the map, 15:20:45

10 correct? 15:20:49

11 A So on my computer, I had -- I had a 15:20:49

12 canvass on one of my monitors, yes. 15:20:55

13 Q And when you say "a canvass," that is 15:20:58

14 a effect- -- or is essentially the map, correct? 15:21:02

15 A It's Ohio geography. 15:21:06

16 Q Okay. So it conveys the state of Ohio and 15:21:08

17 then potentially -- I'm sorry. It conveys the 15:21:11

18 state of Ohio? 15:21:15

19 A It conveys the state of Ohio's geography, 15:21:15

20 yes. 15:21:18

21 Q Okay. And other subdivision lines, for 15:21:18

22 instance, on the state of Ohio? 15:21:21

23 A Yes. 15:21:23

24 Q Okay. And then also the district lines as 15:21:23

25 you're drawing them on the state? 15:21:27

Transcript of Blake Springhetti  
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1	A Yes.	15:21:29
2	Q Okay. And you can move the district lines	15:21:33
3	on the map?	15:21:35
4	A Yes.	15:21:36
5	Q Maptitude also has data view windows, as	15:21:36
6	you said earlier, correct?	15:21:42
7	A Yes.	15:21:43
8	Q So when you -- or in the data view, you	15:21:44
9	would see, for instance, the partisan voting	15:21:50
10	leanings of the district; is that right?	15:21:55
11	A Yes.	15:21:56
12	Q Okay. So when you moved the district	15:21:57
13	lines, the data in the data view window about the	15:22:00
14	partisan leanings of the district would shift?	15:22:06
15	A Yes.	15:22:08
16	Q And so when you shared your maps with the	15:22:09
17	people that you reported to, was the data view	15:22:16
18	window -- or did you share information in the data	15:22:18
19	view window?	15:22:21
20	A So when I would -- when I would show	15:22:21
21	things on Maptitude, I would have my data view on	15:22:27
22	one monitor and my canvass on the other. And the	15:22:30
23	focus was, I would say, primarily on -- the vast	15:22:34
24	majority of the time on the canvass. What --	15:22:39
25	Q Okay.	15:22:42

1           A -- the district lines looked like, what           15:22:42  
2           counties were included, what subdivisions were           15:22:44  
3           included, what subdivisions are split. That was           15:22:46  
4           where the focus was.           15:22:50

5           Q But the data view was also up on the other           15:22:51  
6           monitor?           15:22:55

7           A It was up, but I would just say, just so           15:22:57  
8           you understand what the system -- what the setup           15:23:00  
9           looks like, you know, my monitor to the right has           15:23:02  
10          the canvass, and I'm shifted to the left so           15:23:05  
11          someone can see what that monitor looks like. The           15:23:09  
12          data view is not in plain site when we're going           15:23:11  
13          over those things.           15:23:15

14          Q Okay. But the data view was up when you           15:23:16  
15          showed others your map, including Speaker Cupp?           15:23:18

16          A Yes.           15:23:22

17          Q Okay. And Christine Morrison?           15:23:23

18          A Yes.           15:23:26

19          Q And Ray DiRossi?           15:23:29

20          A Yes.           15:23:36

21          MS. BENDER: I would like to pull up now           15:23:41  
22          the document titled Springhetti001042 GEO9.           15:23:42

23                 (WHEREUPON, Springhetti Exhibit No. 1 was           15:23:42  
24          presented to the witness.)           15:24:33

25          MS. BENDER: Ethan, would you mind if I           15:24:33

1 took control of the screen. 15:24:35

2 Thank you. 15:24:36

3 BY MS. BENDER: 15:24:38

4 Q All right. So does this generally look 15:24:39

5 familiar? 15:24:41

6 A No, I don't think I've seen this before. 15:24:50

7 Q Okay. But this is -- this is maybe not 15:24:52

8 the exact way that you would have seen Maptitude, 15:24:53

9 but this, you can agree, is map -- or is an image 15:24:56

10 of a Maptitude screen? 15:25:00

11 A Could you zoom in on -- I'm a little -- 15:25:02

12 this doesn't look like how I have my system set 15:25:10

13 up. 15:25:13

14 Q Okay. What is different about this -- or 15:25:13

15 what was different about how you had your system 15:25:17

16 set up? Sorry about the highlighting. 15:25:19

17 A Yeah, this is something I haven't seen 15:25:22

18 before. 15:25:24

19 Q And what was different about how you had 15:25:24

20 your system set up? 15:25:30

21 A There's -- well, first off, I don't even 15:25:31

22 really -- it's hard for me to even tell what any 15:25:37

23 of this is. I can't even make an accurate 15:25:40

24 comparison. 15:25:42

25 Q Okay. So when you viewed Maptitude, you 15:25:43

1 would see a map. This may not be -- you know, 15:25:44  
2 have the same district lines or this may not have 15:25:49  
3 the same geographical boundaries as you might see, 15:25:52  
4 but there would be a map sort of centered somewhat 15:25:56  
5 like this? 15:25:59  
6 A No, not at all. My system was not set up 15:26:01  
7 at all like this. 15:26:04  
8 Q So you didn't see a -- so you didn't see a 15:26:06  
9 map? 15:26:09  
10 A I did see a map, but I will say that my 15:26:10  
11 system was not set up at all like this. 15:26:12  
12 Q Okay. Did you see -- over here we have a 15:26:14  
13 display manager. Did you see this on your screen? 15:26:25  
14 A Again, my system is set up very different 15:26:27  
15 than that. It's -- I don't know what all of those 15:26:31  
16 labels mean. I don't know -- 15:26:35  
17 Q Would you have a display manager on which 15:26:39  
18 you could select various layers of geographical 15:26:41  
19 subdivisions? So, for instance, county? For 15:26:50  
20 instance, city? 15:26:55  
21 A Yes, I had -- I had a display manager, 15:26:56  
22 yes. 15:26:58  
23 Q And then you would have a data view. It 15:26:58  
24 sound like, you've said earlier, this data view 15:27:04  
25 would not be in the same window as the map, but it 15:27:06

1 would be -- you would also have a data view? 15:27:09

2 A I would have a data view that's not only 15:27:11

3 not on the same window but not actually on the 15:27:15

4 same monitor as well. 15:27:18

5 Q Okay. Not on the same -- on a different 15:27:19

6 monitor. I'm sorry. I'd like to actually go back 15:27:21

7 because I failed to mention something crucial, 15:27:25

8 obviously. 15:27:28

9 This -- I'll represent to you that this is 15:27:28

10 a screenshot of Maptitude that's generated using 15:27:30

11 the files that you produced in this litigation. 15:27:34

12 So the data in the data view that you saw, which 15:27:41

13 would be on a separate screen -- or would the data 15:27:45

14 view look like this when it was on a separate 15:27:51

15 screen? 15:27:54

16 A No, my data view doesn't look anything 15:27:54

17 like that. 15:27:59

18 Q How is it different? Generally. 15:27:59

19 A Everything about it's different. The 15:28:02

20 numbers are structured differently, the data view 15:28:06

21 itself is built out completely different. It's 15:28:09

22 totally different. Other than the colors of the 15:28:16

23 spreadsheet, that's the only thing that's -- that 15:28:19

24 I can clearly recognize that's the same. 15:28:22

25 Q Can you describe to me what was included 15:28:24

1 within your data view. 15:28:27

2 A Yeah, I had district -- the district 15:28:28

3 number. I had population. I had the deviation 15:28:34

4 from the targeted population for a congressional 15:28:40

5 district, and then I had election results. 15:28:47

6 Q Okay. So -- and it would just show one 15:28:52

7 district at a time? 15:28:56

8 A So -- not always. It would show 15:28:57

9 whatever -- whatever districts are assigned. 15:29:05

10 So sometimes that's one if you only have 15:29:07

11 one. Sometimes it's 15 if you have all 15. 15:29:10

12 Q Okay. And you would control -- you know, 15:29:13

13 based upon what districts you were working on at 15:29:15

14 that moment, you would control what districts 15:29:18

15 appeared in the data view? 15:29:19

16 A Yeah, anything that's assigned a district 15:29:20

17 number will show up on Maptitude. 15:29:28

18 Q And so when you had assigned just one 15:29:30

19 district number, it would just be one district; 15:29:35

20 and when you would assign 15, it would be 15? 15:29:38

21 A Yes. 15:29:42

22 Q Okay. So would it appear a little bit 15:29:46

23 more like this over on this -- on the right side 15:29:51

24 here? 15:29:58

25 A No, my data doesn't look like that either. 15:29:58

1 Q Okay. So just to confirm, when you would 15:30:01  
2 move a district line, the data -- actually, I 15:30:22  
3 think we already confirmed this, so -- but the 15:30:25  
4 data in the data view would change? 15:30:27

5 A Yes, as you -- as you assign district -- a 15:30:29  
6 district new geography, the population changes, 15:30:35  
7 the deviation changes from, you know -- from the 15:30:40  
8 target population, you know, yeah. 15:30:42

9 Q And the partisan data would also change? 15:30:46

10 A Yes. 15:30:50

11 Q Okay. So representing to you that this is 15:30:50  
12 all data that is actually pulled from your files 15:30:56  
13 in this case, I'd like to talk through what is 15:31:00  
14 here. And you can tell me if that data appeared 15:31:04  
15 in your data view or if it did not appear in your 15:31:09  
16 data view that you used. But I wanted to get an 15:31:14  
17 understanding of the data that you had access to 15:31:17  
18 as a result of being present in your files. 15:31:19

19 So apologies in advance, but this is going 15:31:27  
20 to be relatively painstaking here. And, actually, 15:31:29  
21 if it's all right by you, as you can see, there 15:31:32  
22 are lots of columns here and lots of data. We've 15:31:37  
23 exported this into an Excel file. That might make 15:31:41  
24 it easier to review. So we're going to pull up 15:31:44  
25 the same data in an Excel file. 15:31:47

1 MS. BENDER: So if you wouldn't mind, 15:31:51  
2 Ethan, pulling up the Excel file titled GEO9 15:31:54  
3 Excel. 15:32:20  
4 (WHEREUPON, Springhetti Exhibit No. 2 was 15:32:20  
5 presented to the witness.) 15:32:20  
6 MS. BENDER: Great. Thank you very much. 15:32:20  
7 BY MS. BENDER: 15:32:20  
8 Q So looking at this Excel, starting in 15:32:32  
9 Column A, do you know what "ID" means? 15:32:35  
10 A So I know what "ID" means in my Maptitude 15:32:37  
11 system. 15:32:41  
12 Q Okay. In your Maptitude system, what does 15:32:45  
13 "ID" mean? 15:32:47  
14 A District. District ID. District number. 15:32:49  
15 Q Okay. And it looks like that might not be 15:32:51  
16 the case for this -- for this Excel, but generally 15:32:55  
17 you have -- the district number labeled "ID"? 15:32:58  
18 A In my Maptitude system, yes. I don't 15:33:02  
19 recognize this at all. 15:33:04  
20 Q Okay. Do you have a -- do you know what 15:33:05  
21 "DATA" means? 15:33:08  
22 A No. 15:33:10  
23 Q Okay. That's Column B. 15:33:10  
24 In Column C, we have what is labeled here 15:33:16  
25 as the district number, correct? 15:33:19

1           A I don't know what -- I don't know what           15:33:21  
2           this is. I don't know what any of this represents       15:33:24  
3           but -- yeah, I haven't seen this.                       15:33:29  
4           Q So recognizing this is pulled from your               15:33:32  
5           data, do you have any reason to think that the           15:33:34  
6           column labeled "District" would not be the               15:33:37  
7           district number from the map that we're looking       15:33:41  
8           at?   15:33:43  
9           A So I don't know if this was pulled from my           15:33:43  
10          data or not, but this does not look like anything       15:33:48  
11          like my data view.                                       15:33:52  
12          Q Okay. Well, you know, we can show                   15:33:53  
13          separately that this was pulled from your data.       15:33:56  
14                But do you have any -- accepting that it           15:33:58  
15          was pulled from your data, do you have any reason       15:34:01  
16          to think that the column labeled "District" would       15:34:03  
17          not be the district number?                               15:34:07  
18          A So can you -- can you scroll down a little           15:34:08  
19          further?   15:34:11  
20                Well, it appears that there's 15 numbers           15:34:18  
21          in Column C. I -- that's my observation.               15:34:20  
22          Q And 15 numbers corresponding to the 15               15:34:27  
23          districts?   15:34:30  
24          A Yeah, there's 15 numbers in Column C, and           15:34:34  
25          we have 15 congressional districts in the approved       15:34:37

1 plan. 15:34:42

2 Q Okay. And do you know what "Members" 15:34:43

3 would mean? 15:34:46

4 A I would be speculating. I don't know 15:34:47

5 what -- what that means. 15:34:51

6 Q Okay. And "Locked"? 15:34:53

7 A Again, I'll just -- yeah, I don't 15:34:56

8 recognize that. 15:34:59

9 Q And "Locked"? 15:34:59

10 A I don't recognize Column E. 15:35:01

11 Q Okay. And Column E is "Locked" -- or says 15:35:07

12 "Locked," correct? 15:35:08

13 A It does say "Locked," but I -- 15:35:11

14 Q Okay. 15:35:11

15 A -- don't know what that means. 15:35:13

16 Q Okay. Column F, "Name"? 15:35:13

17 A Yeah, again, it says "Name" in Column F, 15:35:19

18 but I don't know what that means. 15:35:22

19 Q Okay. Column G, T-O-T-P-O-P, or TOTPOP -- 15:35:24

20 I'm sorry about that. 15:35:32

21 A Yeah, I recognize TOTPOP. 15:35:41

22 Q Okay. What is that -- 15:35:41

23 A I don't know what all of the -- again, 15:35:43

24 this is first time I'm seeing this set up this 15:35:46

25 way. But I do have a TOT- -- a TOTPOP column on 15:35:49

1 my data view. 15:35:54

2 Q And what does that mean when you have it 15:35:54

3 in your data view? 15:35:57

4 A In my data view, the TOTPOP is the total 15:35:58

5 population of an assigned area in Maptitude. 15:36:01

6 Q So it would be the total population, for 15:36:05

7 instance, of the district that you were working 15:36:10

8 in? 15:36:11

9 A Yes. 15:36:11

10 Q Okay. Column H, G20R, do you know what 15:36:12

11 this is? 15:36:19

12 A So, again, this is very different from my 15:36:20

13 data view. But in my data view, I do have a G20R. 15:36:25

14 Q And what is that? 15:36:31

15 A That is the presidential election results 15:36:31

16 in 2020. 15:36:39

17 Q Okay. And Column I, G20V? 15:36:42

18 A I don't recognize that. 15:36:48

19 Q Okay. So you're not sure what that -- 15:36:55

20 what that is? 15:36:56

21 A I don't have that in my data. I don't 15:36:57

22 know what that is. 15:36:59

23 Q And you don't know what that means? 15:36:59

24 A I don't know what G20V means, no. 15:37:01

25 Q Okay. G20V\_TAPR, that is Column J? 15:37:05

1 A I don't recognize Column J. 15:37:10  
2 Q Okay. So you don't know what it means? 15:37:13  
3 A Correct. 15:37:17  
4 Q G20P\_DV? 15:37:17  
5 A I don't recognize that, either. 15:37:27  
6 Q Okay. And when you say you don't 15:37:29  
7 recognize it, you mean that you don't know what it 15:37:31  
8 means? 15:37:33  
9 A Yeah, I don't know what that means. 15:37:33  
10 Q Okay. G20P\_RV, which is Column L? 15:37:34  
11 A Yeah, I don't -- I don't recognize that. 15:37:43  
12 And just to correct the record, I thought 15:37:45  
13 that the -- that Column H was G20P, but that's 15:37:48  
14 actually an R. I know what G20P is, which we'll 15:37:52  
15 get to here in a minute, it looks like. But I -- 15:37:58  
16 G20R -- I don't have G20R in my data view -- 15:38:02  
17 Q Okay. 15:38:05  
18 A -- just to correct that. 15:38:05  
19 Q Okay. So -- I'm sorry. So we said 15:38:08  
20 G20P\_RV. You don't know what that means? 15:38:13  
21 A Yeah, G20P\_RV, I don't recognize that. 15:38:15  
22 Q G20P\_TV? 15:38:19  
23 A Yeah, I don't recognize that. 15:38:21  
24 Q And G20P\_RP? 15:38:23  
25 A Yeah, I have a -- I have a G20\_RP in my 15:38:28

1 data view. I don't recognize these numbers -- 15:38:34  
2 Q Okay. 15:38:37  
3 A -- but -- 15:38:37  
4 Q And what is G20P -- or you said it was 15:38:39  
5 G20\_RP in your data view. What does that column 15:38:44  
6 mean? 15:38:49  
7 A So in my data view, G20P is what -- is 15:38:51  
8 what I explained for G20R, but I actually thought 15:38:58  
9 that was a P. 15:39:01  
10 So -- 15:39:03  
11 Q Okay. 15:39:03  
12 A -- G20P in my data view is the -- is 15:39:03  
13 election results from the 2020 Presidential 15:39:08  
14 election. 15:39:13  
15 Q And what sort of election results; all 15:39:14  
16 election results or Republican Party election 15:39:18  
17 results? 15:39:23  
18 A It's a percentage. 15:39:27  
19 Q A percentage of what? 15:39:27  
20 A It's Republican percentage. 15:39:29  
21 Q Okay. So it sounds like you would have a 15:39:34  
22 column that was general 2020 election Republican 15:39:36  
23 voter percentage? 15:39:42  
24 A That's what I have in my data view, yes. 15:39:42  
25 Q Okay. Okay. So we then repeat the same 15:39:47

1 columns we just talked to -- or talked through -- 15:39:51  
2 actually, one more question. Would you have any 15:39:54  
3 other columns corresponding to the general 2020 15:39:56  
4 election? 15:39:58  
5 A Yes, I -- yes. 15:39:59  
6 Q What other columns would those be? 15:40:04  
7 A I would -- I would have a -- the same 15:40:06  
8 percentage for that particular election but for 15:40:09  
9 Democrat percentage. 15:40:14  
10 Q Okay. And so for the general 2020, it 15:40:15  
11 would be the Republican percentage, the Democratic 15:40:17  
12 percentage. Any others? 15:40:20  
13 A No. 15:40:22  
14 Q Okay. And so now we go to ones beginning 15:40:22  
15 G12P\_DV. Do you know what G12P means? 15:40:32  
16 A No, I don't have that in my data view. 15:40:34  
17 Q Do you -- do you have anything -- anything 15:40:37  
18 similar to this? Setting aside the data that -- 15:40:47  
19 A I don't have anything similar to Column O, 15:40:51  
20 no. 15:40:54  
21 Q Okay. Do you have anything -- any data in 15:40:54  
22 your Maptitude reflecting the general 2012 15:40:57  
23 election? 15:41:02  
24 A I do not have anything in my data view on 15:41:03  
25 the general 2012 election. 15:41:10

1 Q Okay. And I just -- actually I want to 15:41:12  
2 clarify when you said the general 2020 election 15:41:20  
3 Republican and Democratic percentages, did you 15:41:23  
4 mean Presidential election? 15:41:25  
5 A Yes. 15:41:28  
6 Q Okay. And would you have any other 15:41:29  
7 elections from -- from 2020 represented there? 15:41:32  
8 A No. I don't think there were any other -- 15:41:37  
9 I'd have to look. I don't think there were any 15:41:44  
10 others. 15:41:46  
11 Q Okay. And you would have no elections 15:41:48  
12 from 2012 represented? 15:41:50  
13 A Not -- no, I don't have any -- any 15:41:54  
14 election data from 2012 in my data view. 15:41:56  
15 Q What about 2014? In Column W, we get to 15:42:00  
16 something that appears to indicate 2014 elections. 15:42:04  
17 A Yeah, I didn't have anything, you know, in 15:42:07  
18 my data view on '14 elections. 15:42:14  
19 Q Okay. And then we have '14 for a little 15:42:19  
20 while. 15:42:28  
21 And Column AR we get to 2016. Did you 15:42:29  
22 have anything representing 2016 in your data view? 15:42:33  
23 A Could you clarify the question? 15:42:38  
24 Q Did you have any data representing 2016 15:42:39  
25 elections in your data view? 15:42:43

1           A I did not have anything in my data view           15:42:44  
2 just showing 2016 percentages, no.           15:42:51  
3           Q Okay. So not any -- you know, the           15:42:56  
4 Presidential election in 2016?           15:43:01  
5           A I didn't have anything in my data view           15:43:03  
6 that was just 2016 elections.           15:43:06  
7           Q Okay. So no -- no data view -- or no 2016           15:43:10  
8 in your data view as you could see it.           15:43:13  
9                   Did you -- then in Column AY, we get to           15:43:18  
10 2018 elections. Did you have anything in your           15:43:22  
11 data view representing 2018 elections?           15:43:24  
12           A I did not have anything in my data view           15:43:30  
13 that was showing just 2018 election results.           15:43:33  
14           Q Okay.           15:43:35  
15           A And so none of this -- I'll say again,           15:43:37  
16 none of this looks familiar to me.           15:43:39  
17           Q Okay. So you would have had your data           15:43:41  
18 view set to not reveal any of this information, it           15:43:45  
19 sounds like. Can you confirm that?           15:43:49  
20           A This does not look like my data view.           15:43:54  
21           Q So if you had wanted to adjust your data           15:43:58  
22 view to reveal other elections beyond the ones           15:44:09  
23 that we've discussed thus far, could you?           15:44:11  
24           A It is possible to do in Maptitude, but I           15:44:16  
25 have not done it, so I do not know how to do it.           15:44:19

1 Q Okay. All right. We're going to do a few 15:44:23  
2 more minutes, and then I think take a quick break. 15:44:34  
3 In Column BW, we get to something starting 15:44:37  
4 with the heading "EA51." Do you recognize the 15:44:40  
5 acronym "EA"? 15:44:44  
6 A Yes. 15:44:47  
7 Q And what does "EA" generally stand for? 15:44:52  
8 Or what do you know it to stand for? 15:45:00  
9 A I don't know what "EA" stands for. I just 15:45:02  
10 know it as EA51. 15:45:05  
11 Q And what do you -- what is EA51? 15:45:07  
12 A So EA51 generally is a ten-year lookback 15:45:14  
13 of election results for statewide state and 15:45:19  
14 federal elections. 15:45:25  
15 But this in this column is not that. This 15:45:26  
16 is -- I actually don't know what EA51\_DV is 15:45:34  
17 because I don't have that on my -- 15:45:39  
18 Q Okay. So the -- generally you understand 15:45:41  
19 EA51 to be a ten-year lookback of election results 15:45:43  
20 for statewide state and federal elections. 15:45:47  
21 Would you have -- I'm sorry. Would you 15:45:50  
22 have anything in your data view showing 15:45:53  
23 EA51-related data? 15:45:57  
24 A Yes. 15:45:58  
25 Q And what would that be? 15:46:05

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1           A Well, I have ten-year election results for           15:46:10  
2           statewide state and federal elections in my data           15:46:17  
3           view.           15:46:19  
4           Q Is that in terms of the percentage of           15:46:23  
5           Republican voters under that set of data.           15:46:25  
6           A I would have Republican voters and           15:46:30  
7           Democrat voters.           15:46:35  
8           Q Okay. So there might be two EA -- two           15:46:35  
9           EA-associated columns: one for Republican voters,           15:46:39  
10           one for Democratic voters?           15:46:42  
11           A Yes.           15:46:44  
12           Q Okay. Then moving over, we see on           15:46:44  
13           Column CA, it's titled "EA52."           15:46:52  
14           Do you know what EA52 is?           15:46:56  
15           A Yes.           15:46:58  
16           Q And what is EA52?           15:47:02  
17           A So in my data view, EA52 is a combination           15:47:10  
18           of election results for 2018 and 2020 statewide           15:47:16  
19           elections.           15:47:24  
20           Q And -- so that would be state and federal?           15:47:25  
21           A Yes.           15:47:34  
22           Q Okay. And then I see one more EA, EA53 --           15:47:34  
23           oh, actually, I'm sorry. To close the loop on           15:47:47  
24           that, EA52, did you have columns in your data view           15:47:51  
25           corresponding to EA52?           15:47:54

1           A   Again, my data view looks very different           15:47:56  
2   than this, but, yes, I did have columns associated           15:47:58  
3   with EA52 in my data view.                                   15:48:04  
4           Q   And would those be the Republican votes           15:48:07  
5   and Democratic voters like we talked about earlier           15:48:11  
6   for EA51?   15:48:13  
7           A   In my data view, I have for EA52               15:48:15  
8   Republican percentage and Democrat percentage.           15:48:19  
9           Q   Okay. And it -- sorry. For EA51, those           15:48:22  
10   would also be percents?                                   15:48:25  
11          A   Yes.   15:48:27  
12          Q   Okay. All right. Then over in Column CH,       15:48:28  
13   we have EA53. Do you know what EA53 would be?           15:48:34  
14          A   Yes.   15:48:37  
15          Q   And what is that?                               15:48:41  
16          A   In my data, EA53 is the election               15:48:42  
17   results -- statewide election results for state           15:48:50  
18   and federal races in '16, '18, and '20.                   15:48:52  
19          Q   Okay. And you would have those in terms       15:48:56  
20   of Democratic votes and Republican votes as well?       15:49:02  
21          A   In my data view, I have EA53 Republican       15:49:05  
22   percentage and Democrat percentage.                       15:49:11  
23          Q   Good. And -- so these -- these are three       15:49:15  
24   different sets of election data. Who came up with       15:49:21  
25   these sets of election data?                               15:49:25

1           A    So for the General Assembly process, Ray           15:49:33  
2           and I discussed election results that would be           15:49:39  
3           useful or good to look at for the General Assembly           15:49:46  
4           process.           15:49:51  
5           Q    Okay. And so you and Ray decided -- do           15:49:52  
6           you mind if I call these index -- indices or           15:49:56  
7           indexes of election results?           15:50:00  
8           A    Sure.           15:50:05  
9           Q    Is there a different way that you would           15:50:05  
10          refer to them?           15:50:07  
11          A    I would just call them election results.           15:50:07  
12          Q    Okay. So just to -- just to clarify and           15:50:11  
13          make sure that I'm being clear on the record when           15:50:15  
14          we're talking about just election results versus           15:50:17  
15          sets or composites of elections results, then I'm           15:50:22  
16          just going to call them indices.           15:50:25  
17                  But you and Ray would have decided -- or           15:50:28  
18          would have discussed which indices you might           15:50:33  
19          consider?           15:50:35  
20          A    In the General Assembly process, we           15:50:35  
21          discussed election results that would be helpful           15:50:42  
22          for us to have in Maptitude --           15:50:46  
23          Q    Okay.           15:50:51  
24          A    -- for the General Assembly process, and           15:50:51  
25          then --           15:50:52

1 Q And those were also -- 15:50:53

2 A -- my data view -- my data view did not 15:50:54

3 change from that. 15:50:58

4 Q Okay. All right. Just to move along 15:50:59

5 then. 15:51:14

6 We have, in Column CI, we have a percent 15:51:14

7 G20P\_RV. Do you know what that means? 15:51:24

8 A I do not recognize that column. 15:51:27

9 Q Okay. So you're not -- you don't know 15:51:32

10 what it means? 15:51:34

11 A Yeah, I don't have that in my database. 15:51:35

12 Q So, so far I think we've discussed four 15:51:39

13 composites. You had a -- an EA51 percentage of 15:51:43

14 Democratic votes, percentage of Republican votes. 15:51:50

15 EA52, same thing. EA53. 15:51:52

16 Were there any other composites in your 15:51:55

17 results -- or, I mean, in your data view? 15:51:58

18 A Well, the fourth one is just 2020. 15:52:01

19 Q Okay. Just 2020. And no others? 15:52:08

20 A Correct. 15:52:11

21 Q Okay. If you'll give me just one minute. 15:52:16

22 Okay. And did you -- so you didn't have a 15:52:48

23 composite that was just statewide federal election 15:52:54

24 results between 2012 and 2020? 15:53:00

25 A That's correct; I did not have that in my 15:53:06

1 data view. 15:53:09

2 Q Okay. 15:53:09

3 MS. BENDER: I think that we can take down 15:53:18

4 this exhibit. Thank you, Ethan. 15:53:22

5 And if it's all right by you, I would like 15:53:28

6 to take a break. I imagine that you could use one 15:53:31

7 as well. 15:53:36

8 MR. McGUIRE: Yes, that's -- we have no 15:53:36

9 problem with that. Again, I think we'd like to 15:53:38

10 get -- since we're going to go into the -- pretty 15:53:40

11 long into the evening, keep it relatively short if 15:53:43

12 we can. 15:53:44

13 MS. BENDER: Can we go off record. 15:53:48

14 THE VIDEOGRAPHER: The time is 3:53. We 15:53:50

15 are off the record. 15:53:53

16 (WHEREUPON, a recess was had.) 15:54:46

17 THE VIDEOGRAPHER: The time is 4:02. We 16:02:17

18 are on the record. 16:02:23

19 MS. BENDER: Ethan, would you mind pulling 16:02:28

20 up, please, Springhetti -- the document titled 16:02:30

21 "Springhetti000217." 16:02:34

22 (WHEREUPON, Springhetti Exhibit No. 3 was 16:02:47

23 presented to the witness.) 16:02:59

24 MS. BENDER: And can you move to -- or I'd 16:02:59

25 like to mark this as an exhibit, of course. And 16:03:03

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1 I'm not sure that I formally said that for the 16:03:09  
2 last two documents that we've looked at, but also 16:03:12  
3 those should be marked as exhibits. So this 16:03:14  
4 should be Exhibit 3. 16:03:17

5 So if you could move to Page 6. 16:03:23

6 BY MS. BENDER: 16:03:30

7 Q Okay. Great. 16:03:30

8 Mr. Springhetti, are you familiar with 16:03:31  
9 this document? 16:03:31

10 A Yes. 16:03:40

11 Q And this appears to be a memo that's 16:03:40  
12 analyzing substitute Senate Bill 7- -- or 258; is 16:03:43  
13 that right? 16:03:47

14 A Could you scroll down just so I can see 16:03:47  
15 the full document? 16:03:50

16 Q Yeah, I think that's -- 16:03:51

17 A I can only see like the top. 16:03:53

18 Q I think actually -- why don't we -- to get 16:04:02  
19 you acquainted with this, why don't we go to 16:04:07  
20 the -- no, actually, that's fine. If you want to 16:04:10  
21 go to the first page and just scroll through the 16:04:12  
22 whole document. 16:04:15

23 (Brief pause in proceedings.) 16:06:10

24 BY MS. BENDER: 16:06:13

25 Q With that context, does this portion of 16:06:13

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1	the document -- I'm just looking at this -- what	16:06:15
2	appears to be a memo. Are you familiar with this?	16:06:18
3	A Yes.	16:06:20
4	Q Okay. And who wrote this memo?	16:06:21
5	A I did.	16:06:25
6	Q Did anyone else help in the writing of	16:06:27
7	this memo?	16:06:34
8	A Yes.	16:06:36
9	Q And who else?	16:06:41
10	A I worked with legal counsel in drafting	16:06:42
11	that.	16:06:47
12	Q Okay. Anyone else?	16:06:49
13	A No.	16:06:50
14	Q Did anyone else review it beyond legal	16:06:52
15	counsel?	16:06:57
16	A No.	16:06:58
17	Q And no one else edited it then?	16:07:00
18	A No.	16:07:08
19	Q And when did you write this memo?	16:07:09
20	A I don't -- I don't recall the date that I	16:07:11
21	wrote that.	16:07:15
22	Q Can you give me approximately --	16:07:16
23	approximate time period.	16:07:21
24	A I would say approximately around when --	16:07:22
25	when -- around when the sub bill became public.	16:07:27

1 Q When it became public? So not before it 16:07:32  
2 became public? 16:07:35  
3 A No, I started drafting it before it became 16:07:36  
4 public, but not -- I would say not soon before. 16:07:40  
5 It was -- 16:07:44  
6 Q Okay. 16:07:44  
7 A -- around that time, yeah. 16:07:45  
8 Q So sometime between when the -- or before 16:07:46  
9 the substitute bill was introduced, you began 16:07:50  
10 drafting this document? 16:07:53  
11 A I'll tell you I -- I know for sure it was 16:07:56  
12 between November 9th and when -- and 16:08:00  
13 November 15th. It was at some point in that time 16:08:02  
14 frame. 16:08:06  
15 Q Great. And did you share this memo with 16:08:06  
16 anyone? 16:08:09  
17 A Yes. 16:08:09  
18 Q Who did you share it with? 16:08:10  
19 A I shared it with -- in addition to what I 16:08:12  
20 already -- the answer I already provided, I shared 16:08:19  
21 it with our Chief of Staff. 16:08:22  
22 Q Okay. So that's Christine Morrison? 16:08:26  
23 A Yes. 16:08:28  
24 Q And did you share it with anyone else? 16:08:30  
25 A I did not send it to anyone else, no. 16:08:33

1 Q Do you know if Ms. Morrison sent it to 16:08:37  
2 anyone else? 16:08:44  
3 A I believe she did send it to other people, 16:08:45  
4 yes. 16:08:48  
5 Q Do you know who she might have sent it to? 16:08:49  
6 A I believe she sent it to members of the 16:08:52  
7 (inaudible). 16:09:06  
8 (Reporter clarification.) 16:09:07  
9 BY THE WITNESS: 16:09:08  
10 A Members of the Ohio -- members of the Ohio 16:09:09  
11 General Assembly. 16:09:12  
12 BY MS. BENDER: 16:09:13  
13 Q And do you know which members? 16:09:18  
14 A I do not know which -- which lists or 16:09:19  
15 email lists she used, so I -- I'm not sure. 16:09:27  
16 Q So could you tell me any of the members 16:09:30  
17 that might have -- or that you think received this 16:09:33  
18 memo? 16:09:36  
19 A I would be speculating. I don't know 16:09:36  
20 which -- which email list she sent it to because 16:09:41  
21 I'm not on that email list, so... 16:09:45  
22 Q Okay. Do you know if anyone beyond 16:09:47  
23 Ms. Morrison would have shared this memo? 16:09:50  
24 A No, I think -- now that I think about it, 16:09:52  
25 I did share it with one other person, now that 16:10:02

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1 I -- now that I remember. I shared a -- I shared 16:10:06  
2 it with -- after it went out -- after Christine -- 16:10:09  
3 after I sent it to Christine, I provided it to 16:10:12  
4 members of the Governor's staff. 16:10:17

5 Q Okay. Which members of the Governor's 16:10:21  
6 staff? 16:10:24

7 A Aaron Crooks. 16:10:24

8 Q And anyone beyond that? 16:10:30

9 A No. 16:10:31

10 Q And you're not sure if anyone beyond 16:10:31  
11 Christine would have shared it? 16:10:39

12 A Yeah, once I sent it to Christine, I'm not 16:10:40  
13 sure where it went after that. 16:10:43

14 Q Okay. What would it surprise you to learn 16:10:45  
15 to Representative Oelslager had a copy of this 16:10:49  
16 memo? 16:10:51

17 A No, it wouldn't surprise me. 16:10:55

18 Q Okay. Just to confirm, that memo does 16:10:57  
19 appear in the production that Representative 16:11:06  
20 Oelslager made in this case at Oelslager00091. 16:11:10

21 MS. BENDER: Ethan, just to -- just for 16:11:17  
22 clarity, would you mind pulling that up. I think 16:11:18  
23 it's labeled as such. 16:11:22

24 (WHEREUPON, Springhetti Exhibit No. 4 was 16:11:23  
25 presented to the witness.) 16:12:12

1 BY MS. BENDER: 16:12:12

2 Q But this also appears to be a version of 16:12:13

3 this memo, correct? 16:12:15

4 A If you could just quickly scroll down to 16:12:16

5 the bottom of it, yeah, I would -- I could see 16:12:21

6 that. 16:12:24

7 Yeah. That appears to be the same memo, 16:13:00

8 yeah. 16:13:02

9 MS. BENDER: Okay. So if we could go back 16:13:02

10 to the -- actually, if we could mark this as 16:13:04

11 Exhibit 4, please. Thank you. 16:13:08

12 And then if we could just go back to 16:13:09

13 Exhibit 3 and stay at Page 6. 16:13:11

14 BY MS. BENDER: 16:13:13

15 Q So what was the general purpose of this 16:13:13

16 memo? 16:13:15

17 A So I put that memo together, which is 16:13:22

18 pretty typical. When we're dealing with any 16:13:25

19 legislative business, we put, you know, brief 16:13:27

20 summaries together for -- for members of the 16:13:32

21 General Assembly in advance of a floor vote. 16:13:36

22 Q Okay. So the purpose was to summarize 16:13:43

23 the -- summarize what would be going up on the 16:13:46

24 floor then? 16:13:49

25 A And to -- I would say the purpose of the 16:13:51

1 memo was to give some information to members of 16:13:53  
2 the General Assembly on Article 19 and provide 16:13:57  
3 them some population information and provide them 16:14:01  
4 some -- some general information on the substitute 16:14:04  
5 bill. 16:14:11

6 Q Okay. So let's look at some portions of 16:14:11  
7 this memo. 16:14:15

8 MS. BENDER: Ethan, actually, would you 16:14:20  
9 mind if I took control here. 16:14:22

10 BY MS. BENDER: 16:14:26

11 Q So as you noted, there's -- there appears 16:14:26  
12 to be some information on Article 19 here. Then 16:14:31  
13 there's a section on county and political 16:14:43  
14 subdivision splits. 16:14:47

15 Bullet 2, it says, "Substitute Senate 16:14:52  
16 Bill 258 includes 76 whole counties and 12 split 16:14:57  
17 counties, with two counties split between three 16:14:59  
18 congressional districts (Cuyahoga and Hamilton)"; 16:15:03  
19 that's correct? 16:15:14

20 A Yes. 16:15:14

21 Q Okay. Six, Senate Substitute Bill splits 16:15:15  
22 14 subdivisions compared to the House Democrat -- 16:15:20  
23 Democratic plan. The general gist of that bullet? 16:15:22

24 A Yeah, it's -- yeah, the substitute bill 16:15:26  
25 splits less -- less subdivisions than the House 16:15:30

1 Democrat plan. 16:15:33

2 Q Okay. Then we've got some detail about 16:15:34

3 cities. [As read] "70 percent of Columbus and 16:15:40

4 subdivisions circumscribed within Columbus, is 16:15:43

5 within Congressional District C" -- C3, so on and 16:15:47

6 so on. 16:15:51

7 That's right? 16:15:52

8 A Yes, approximately 70 percent of Columbus 16:15:52

9 is in the 3rd Congressional District. 16:16:03

10 Q Okay. All right. I'm going to flip ahead 16:16:05

11 to Page 9 here. Sorry, I'm going too far. 16:16:07

12 All right. Bullet 2, it says, 16:16:15

13 "Congressional districts are considered 16:16:18

14 competitive if the district leans politically 16:16:19

15 towards one party by 4 percent or less." 16:16:22

16 Is that right? 16:16:25

17 A For the purposes of this memo, yes, it -- 16:16:25

18 Q That's what -- 16:16:32

19 A -- the -- that's how the memo reads, yes. 16:16:32

20 Q Okay. And where did this 4 percent number 16:16:35

21 come from? 16:16:40

22 A It is a number that was agreed to be 16:16:43

23 considered competitive. 16:16:51

24 Q And who agreed? 16:16:53

25 MR. McGUIRE: I'm going to assert the 16:16:58

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1 legislative objective -- legislative privilege 16:17:00  
2 objection to the extent that his answer would 16:17:03  
3 encompass about -- who agreed to the 4 percent 16:17:06  
4 would encompass members of the General Assembly or 16:17:10  
5 the staff members and instruct him not to provide 16:17:13  
6 any -- not to answer with any of those names. 16:17:15  
7 But you can answer if there were people 16:17:18  
8 outside of that group. 16:17:20  
9 THE WITNESS: There was not. 16:17:21  
10 MS. BENDER: Okay. Again, I would say 16:17:23  
11 that we do not agree that this is covered by the 16:17:25  
12 legislative privilege and we will move on. 16:17:29  
13 BY MS. BENDER: 16:17:38  
14 Q When was it agreed that 4 percent was the 16:17:39  
15 number which you considered things competitive -- 16:17:41  
16 or district competitive? 16:17:43  
17 A I don't recall the exact time and day when 16:17:45  
18 that -- when that was to -- when that was 16:17:53  
19 determined, but I can tell you it was sometime 16:17:57  
20 between November 9th and November 15th. 16:18:00  
21 Q And who did -- or who proposed this 16:18:08  
22 4 percent number? 16:18:13  
23 MR. McGUIRE: Well, I'll object on the 16:18:24  
24 basis of legislative privilege, again, if that 16:18:25  
25 answer calls for you to name a member of the 16:18:28

1 General Assembly or any staff member. If not, you 16:18:32  
2 can answer. 16:18:34  
3 BY THE WITNESS: 16:18:35  
4 A That was -- again, that was deliberated 16:18:35  
5 internally amongst legislative members and staff. 16:18:37  
6 MS. BENDER: Okay. And, again, I'll say 16:18:42  
7 the same thing as before, we do not agree that 16:18:44  
8 this is covered by the legislative privilege, but 16:18:46  
9 we will move on. 16:18:49  
10 BY MS. BENDER: 16:18:50  
11 Q So at the next bullet, it says, 16:18:50  
12 "Congressional Districts 1, 6" -- or not the next. 16:18:55  
13 I guess this is two down. 16:18:57  
14 "Congressional Districts 1, 6, 9, 10, 13, 16:18:58  
15 14, and 15 could lean plus or minus 4 percent," 16:19:08  
16 correct? 16:19:12  
17 A Yes, that's what it says. 16:19:12  
18 Q Okay. All right. I'd like to go back -- 16:19:18  
19 now I'm going to go to Page 2. And this is -- you 16:19:25  
20 know, we have this included in the same document 16:19:28  
21 because it appears to be attached to the same 16:19:30  
22 email, but this appears to be a separate document. 16:19:32  
23 Are you familiar with -- with this one? 16:19:34  
24 A Could you scroll down a little bit so I 16:19:36  
25 can see the full -- the full document. 16:19:45

1 Q I think it just repeats itself. 16:19:54  
2 A Yeah. 16:19:56  
3 Q Are you familiar with this document? 16:19:56  
4 A Yes. 16:20:05  
5 Q And this appears to be just highlights of 16:20:05  
6 Senate Bill -- or Substitute Senate Bill 258; is 16:20:08  
7 that right? 16:20:12  
8 A Yes. 16:20:12  
9 Q Did you also write this? 16:20:13  
10 A Yes. 16:20:14  
11 Q Did you have any help writing it? 16:20:15  
12 A I recall this -- the same -- myself and 16:20:22  
13 legal counsel drafted it. 16:20:30  
14 Q And did anyone provide any edits on it 16:20:33  
15 beyond legal counsel? 16:20:37  
16 A Yes. 16:20:40  
17 Q And who was that? 16:20:41  
18 A So after I sent that to Christine, I 16:20:43  
19 believe Christine made some edits for purposes 16:20:53  
20 that she wanted to use the -- the document. 16:20:58  
21 Q Okay. And did -- would you -- did you get 16:21:02  
22 back a version of that document reflecting her 16:21:10  
23 edits? 16:21:13  
24 A No, I don't believe I got a document back 16:21:18  
25 from her with her edits on it. 16:21:21

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1	Q Okay. So you sent this to her, and she	16:21:24
2	edited it and sent it off?	16:21:28
3	A Yes, I -- I don't know who she provided	16:21:30
4	the document to. Similar to the other document, I	16:21:34
5	don't know which email list she sent that out.	16:21:38
6	Q Okay. When was this document written?	16:21:42
7	A I would say around the same timeline as --	16:21:45
8	as the other memo.	16:21:49
9	Q So that was, I believe, between	16:21:50
10	November 9th and 15th?	16:21:53
11	A Yes.	16:21:55
12	Q Before -- that is before the substitute	16:21:59
13	bill was introduced?	16:22:03
14	A Yes.	16:22:10
15	Q Okay. And you shared this with Christine	16:22:10
16	Morrison, and you said you're not sure who she	16:22:13
17	would have shared it with?	16:22:15
18	A Yes. I don't know which -- again, I don't	16:22:18
19	know which email list she may have used or who	16:22:22
20	else she might have sent it to. I -- the buck	16:22:25
21	stops there for me. Once I provided it to her, I	16:22:29
22	don't know really --	16:22:32
23	Q And do you know if she did share it with	16:22:32
24	anyone else?	16:22:35
25	A I believe she did, but I don't know --	16:22:35

1 Q But you're -- 16:22:37  
2 A -- if -- 16:22:39  
3 Q -- just not sure exactly? 16:22:40  
4 A Right. 16:22:40  
5 Q Sorry about that. I didn't mean to speak 16:22:41  
6 over you. 16:22:43  
7 And did you share it with anyone be- -- 16:22:44  
8 beyond Christine Morrison? 16:22:47  
9 A No. 16:22:48  
10 Q And legal counsel, I guess you said 16:22:57  
11 earlier? 16:22:59  
12 A Other than legal counsel and Christine, 16:22:59  
13 no. 16:23:00  
14 Q And do you recall around when you shared 16:23:00  
15 this? 16:23:03  
16 A When I -- could you -- when I shared it 16:23:09  
17 with legal counsel and -- 16:23:11  
18 Q Mm-hm. 16:23:12  
19 A -- Christine? 16:23:12  
20 Q Yep. 16:23:14  
21 A So I shared it with legal counsel around 16:23:14  
22 the same timeline as the other memo and then 16:23:20  
23 provided it to Christine, I believe, on -- on the 16:23:23  
24 15th. 16:23:26  
25 Q Okay. And what was the purpose of this 16:23:27

1 document? 16:23:30

2 A So the purpose of that document was -- was 16:23:30

3 to have a little less dense -- although, I don't 16:23:36

4 think four pages, single space, is dense. But we 16:23:42

5 tried to give something to members that's even 16:23:45

6 more narrowed down in addition to the memos for -- 16:23:49

7 for legislation before a floor vote. 16:23:52

8 So this is not an uncommon -- common thing 16:23:55

9 for staff to do for members. 16:23:58

10 Q Okay. So this is -- this is, like, the -- 16:24:00

11 this is and even narrower version with the most 16:24:03

12 important points, something like that? 16:24:07

13 A I wouldn't say that -- important? I mean, 16:24:08

14 I think there are other things that are not on 16:24:16

15 this that are important, but this is just a 16:24:18

16 simplified, shortened version of the previous 16:24:20

17 memo. 16:24:23

18 Q Okay. I'm going to scroll up to this 16:24:35

19 first document here, which is the email that these 16:24:37

20 are attached to. 16:24:42

21 In this email, it looks like it was sent 16:24:43

22 on November 15th, correct? 16:24:44

23 A Yes, that's what it says. 16:24:45

24 Q And to Christine Morrison and Paul 16:24:51

25 Disantis? 16:24:54

1 A Yes, that's correct. 16:24:54

2 Q And Paul Disantis is legal counsel? 16:24:59

3 A He is the House achieve legal counsel. 16:25:01

4 Q And the subject is "Content." What do you 16:25:04

5 mean -- content for what? What does that mean? 16:25:13

6 A Just consent for the substitute bill. 16:25:17

7 Q The content of the substitute bill? 16:25:24

8 A Yeah, content is just information -- 16:25:27

9 information about the sub bill. 16:25:33

10 Q Okay. So the -- would you mind just 16:25:34

11 reading the text of this email for us. 16:25:42

12 A Sure. The text says, "The highlight brief 16:25:46

13 is skimmed down with non-constitutional facts 16:25:49

14 added. The memo is the same document I sent 16:25:52

15 earlier that has a lot more information." 16:25:55

16 Q When you say "with non-constitutional 16:25:59

17 facts added," what did you mean by that? 16:26:02

18 A So what I meant by that is, I -- this 16:26:04

19 was -- this -- if you look -- if you compare the 16:26:10

20 two memos, one gives a brief summary of some of 16:26:12

21 the rules in Article 19, and this shortened memo 16:26:17

22 does not. 16:26:23

23 Q Okay. And so when you say "added," you 16:26:26

24 mean added -- oh, wait. Actually, let me make 16:26:29

25 sure that I understood that correctly. 16:26:36

1           So you were saying the constitutional           16:26:38  
2 facts are added to the highlight -- or added           16:26:40  
3 beyond what is --           16:26:46  
4           A I'm saying --           16:26:47  
5           Q -- in the highlight brief to -- and that's           16:26:47  
6 what's in the memo?           16:26:50  
7           A I'm sorry, yeah, the -- sorry to interrupt           16:26:51  
8 you. But, yeah, just to clarify, this is --           16:26:54  
9 I'm -- what I'm basically trying to say here is           16:26:57  
10 that the highlight sheet does not include           16:27:00  
11 constitutional -- the constitutional summaries.           16:27:05  
12           Q Okay. And when you say it was added, it           16:27:10  
13 was added versus -- versus the memo or versus --           16:27:13  
14 added to what?           16:27:19  
15           A Yeah, so I think what this is, is, I added           16:27:20  
16 some things to the highlight sheet that are not in           16:27:27  
17 the larger memo that aren't necessarily summaries           16:27:30  
18 of Article 19. And I think that's what I was           16:27:32  
19 trying to say here.           16:27:35  
20           Q All right. Great.           16:27:42  
21           All right. So let's -- I want to look at           16:27:43  
22 some of the portions of the highlight sheet then,           16:27:44  
23 which is here.           16:27:47  
24           So it's -- it also says, [as read]           16:27:48  
25 "Substitute Senate Bill 258 includes 76 whole           16:27:52

1 counties, which is more counties than any Ohio 16:27:57  
2 congressional plan approved in over 50 years." 16:28:00  
3 But this little -- or similar to the 16:28:03  
4 information from the memo, right? 16:28:05  
5 A Yeah, I think there will be some similar 16:28:08  
6 information here -- 16:28:11  
7 Q Okay. 16:28:12  
8 A -- between this memo and -- 16:28:12  
9 Q Okay. And so in the next section, it 16:28:15  
10 says, [as read] "Senate Substitute Bill 58" -- or 16:28:21  
11 "Substitute Senate Bill 58 splits 14 subdivisions 16:28:26  
12 compared to the House Democratic plan split 21." 16:28:30  
13 Similar to the other memo? 16:28:33  
14 A Yes, the substitute bill splits less 16:28:35  
15 subdivisions than the House Democratic plan. 16:28:40  
16 Q All right. So a lot of this is just 16:28:42  
17 excerpting or providing highlights from the memo, 16:28:44  
18 right? 16:28:48  
19 A Yeah, that was the goal of it, was to just 16:28:48  
20 provide a simplified document for members to get 16:28:50  
21 acquainted with what was in the substitute bill. 16:28:58  
22 Q Okay. So there's -- there's one thing 16:29:01  
23 that seems to be different here. Under "Partisan 16:29:04  
24 Leanings," can you read Bullet 2 to me. 16:29:10  
25 A Bullet 2: "Under this plan in a good 16:29:14

1 election year in which Republicans recruit good 16:29:19  
2 candidates, Republicans can win more than 11 of 15 16:29:23  
3 districts." 16:29:28  
4 Q And this wasn't included in the memo? 16:29:30  
5 A I don't recall if I put that in the other 16:29:33  
6 memo or not. 16:29:36  
7 Q Do you want to take a look and see? 16:29:37  
8 A Sure. So can you go back up there? 16:29:39  
9 Q Oh, sorry. Oh, you're right. I made it 16:29:51  
10 -- 16:29:53  
11 A Yeah. 16:29:53  
12 Q -- oh, no, I think this -- that was on -- 16:29:53  
13 there's two versions of the key facts in here. 16:29:54  
14 This is -- this is -- so this is the memo I think, 16:29:56  
15 right? 16:29:59  
16 A If could you scroll down. 16:29:59  
17 Q Yep. 16:30:07  
18 A Thanks. 16:30:07  
19 Okay. Good on Page 1. 16:30:17  
20 Okay. Yeah, it appears I didn't put it in 16:30:20  
21 the larger memo. 16:31:18  
22 Q And do you know, why was that cut out? 16:31:19  
23 A So the -- the larger memo was actually 16:31:26  
24 completed first. 16:31:34  
25 Q Hm-mm. 16:31:34

1           A    So the larger memo was completed first. I           16:31:40  
2    took excerpts of that into the highlight sheet and           16:31:44  
3    then added some things that weren't in the first           16:31:47  
4    memo to the highlight sheet.                                   16:31:51

5           Q    Okay. So why did you think this was           16:31:53  
6    important to add?   16:31:56

7           A    Well, I -- I think it's important that           16:31:56  
8    members know that if there are good candidates           16:32:03  
9    that are recruited, if, you know, Republicans, you           16:32:09  
10   know, continue to run on winning issues in Ohio,           16:32:17  
11   that -- that that could happen. It could also not           16:32:20  
12   happen. It was something -- it was some context           16:32:26  
13   that I thought members should see.                           16:32:32

14          Q    All right.   16:32:36

15          A    And I think that's -- that's the               16:32:37  
16   importance of that map, is -- it's very                   16:32:40  
17   competitive. So that could happen, that could not           16:32:42  
18   happen, and that's what makes it a good map.               16:32:45

19          Q    All right. I think we'll move on from           16:32:50  
20   this exhibit now.   16:32:54

21           MS. BENDER: Ethan, would you please pull           16:32:55  
22   up Springhetti000183.   16:32:57

23                   (WHEREUPON, Springhetti Exhibit No. 5 was           16:33:03  
24   presented to the witness.)                                   16:33:19

25           MS. BENDER: And if you wouldn't mind, I           16:33:19

1 will take control. 16:33:22

2 BY MS. BENDER: 16:33:30

3 Q So this appears to be -- well, do you 16:33:31

4 recognize this document? 16:33:32

5 A Could you scroll down for me. 16:33:33

6 Yes, that appears to be a -- some draft of 16:34:04

7 the larger memo. 16:34:09

8 Q Okay. And so your role would have been 16:34:11

9 the same as we discussed earlier; you would have 16:34:12

10 drafted this? 16:34:15

11 A Yes, this looks like something that I -- 16:34:16

12 that I drafted. 16:34:19

13 Q Okay. And so this would have been -- 16:34:20

14 A But it looks like -- but it looks like -- 16:34:22

15 just to clarify, it looks like it was a draft. I 16:34:25

16 don't know that that was -- 16:34:27

17 Q Right. So this would have been, like, an 16:34:28

18 earlier iteration of that same memo? 16:34:31

19 A That's what it -- this appears to be, 16:34:33

20 yeah. 16:34:36

21 Q Okay. And do you recall sharing drafts 16:34:36

22 like this of the memo with anyone? 16:34:41

23 A Just legal counsel. 16:34:46

24 Q Okay. And do you know if you shared this 16:34:49

25 specific version of the memo with anyone? 16:34:52

1           A I don't recall sending -- sending any           16:34:54  
2 drafts to anyone --           16:35:01  
3           Q Except for legal --           16:35:03  
4           A -- but, again -- but, again -- yeah,           16:35:05  
5 except for legal counsel. But, again, this --           16:35:08  
6 these all look pretty similar, so I don't, you           16:35:10  
7 know, recall which one I drafted when.           16:35:13  
8           Q Okay. But there were drafts that you           16:35:15  
9 would have shared?           16:35:17  
10          A With legal counsel there are --           16:35:17  
11          Q Yeah.           16:35:21  
12          A -- some drafts that I would have shared.           16:35:22  
13          Q Okay. All right. So on Page 3 then, the           16:35:24  
14 second bullet, would you read this to me.           16:35:28  
15          A "Congressional districts are considered           16:35:30  
16 competitive if the district could -- could have           16:35:35  
17 favored or disfavored one political party by           16:35:38  
18 3.75 percent or less."           16:35:41  
19          Q So this is different than the 4 percent           16:35:44  
20 metric we looked at earlier, correct?           16:35:47  
21          A That's correct.           16:35:51  
22          Q And where did this metric come from?           16:35:51  
23          MR. McGUIRE: Well, I'm going to raise an           16:35:57  
24 objection on legislative privilege grounds to the           16:35:59  
25 extent that the -- that figure was provided by a           16:36:02

1 member of the General Assembly or a member's staff 16:36:05  
2 members. 16:36:10  
3 You can answer for anyone other than that. 16:36:10  
4 BY THE WITNESS: 16:36:13  
5 A So when we discussed 3.75 percent, that 16:36:13  
6 was an internal deliberation. 16:36:19  
7 MS. BENDER: Okay. I will make the same 16:36:22  
8 response that, again, we don't believe this to be 16:36:25  
9 covered by the legislative privilege, and we can 16:36:28  
10 move on. 16:36:30  
11 BY MS. BENDER: 16:36:30  
12 Q When would this 3.75 percent figure have 16:36:31  
13 been discussed? 16:36:37  
14 A Sometime between November 9th and 16:36:39  
15 November 15th. 16:36:51  
16 Q Okay. Before the 4 percent figure was 16:36:52  
17 decided on? 16:36:57  
18 A Yes. Yes. Before -- before that, yes. 16:36:58  
19 MS. BENDER: All right. I think we're 16:37:03  
20 done with this exhibit then. And that would -- if 16:37:04  
21 we haven't already, can we mark that as Exhibit 5. 16:37:11  
22 I'm sorry about that. 16:37:14  
23 And then, Ethan, after that, would you 16:37:14  
24 please pull up Springhetti00020. 16:37:17  
25

Transcript of Blake Springhetti  
Conducted on December 7, 2021

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1	(WHEREUPON, Springhetti Exhibit No. 6 was	16:37:22
2	presented to the witness.)	16:37:38
3	BY MS. BENDER:	16:37:38
4	Q Mr. Springhetti, are you familiar with	16:37:40
5	this document?	16:37:41
6	A Yes, I --	16:37:47
7	MS. BENDER: And, again -- Ethan, if you	16:37:48
8	wouldn't mind giving me that control again.	16:37:50
9	BY MS. BENDER:	16:37:52
10	Q Sorry. I think you said yes?	16:37:52
11	A I'm familiar with this page, yes.	16:37:53
12	Q Sorry to speak over you.	16:37:55
13	And then this page as well?	16:37:57
14	A Yes.	16:37:59
15	Q Okay. So this appears to be an analysis	16:38:01
16	of a map, correct?	16:38:12
17	A Yes.	16:38:13
18	Q And do you know which map?	16:38:14
19	A Yes.	16:38:16
20	Q What map was that?	16:38:21
21	A That would be subject to House Bill 258.	16:38:23
22	Q Okay. And did you create this?	16:38:28
23	A I did not.	16:38:29
24	Q Who created this?	16:38:31
25	A I believe this was created by Ray DiRossi.	16:38:33

1 Q Okay. Did you have any input into this? 16:38:41  
2 A No. 16:38:43  
3 Q Did you provide any feedback on this? 16:38:46  
4 A No. 16:38:48  
5 Q Okay. Do you know if anyone else had any 16:38:48  
6 input into this beyond Mr. DiRossi? 16:38:56  
7 A I don't know how the draft started, so I 16:38:58  
8 can't -- I'm not sure who else may have opined on 16:39:03  
9 that. 16:39:09  
10 Q And do you know when this was created? 16:39:09  
11 A I do not. 16:39:11  
12 Q When did you first see it? 16:39:12  
13 A Sometime between November 9th and 16:39:19  
14 November 15th. 16:39:23  
15 Q Did you share it with anyone else? 16:39:23  
16 A This graph, I believe, was in one of the 16:39:27  
17 memos that I provided. 16:39:37  
18 Q Okay. Other than that? 16:39:39  
19 A No. 16:39:41  
20 Q And do you know if it was shared with 16:39:43  
21 anyone else, even if you didn't do the sharing? 16:39:49  
22 A Yeah, I -- that would be speculation. I'm 16:39:52  
23 not sure who -- who may have seen this or received 16:39:54  
24 it. 16:39:57  
25 Q Okay. So beyond Mr. DiRossi and yourself, 16:39:57

1 you don't know who else might have had this 16:40:00  
2 memo -- or excuse me, this memo -- this document? 16:40:02  
3 A Yeah, I'm not sure. I don't know who else 16:40:05  
4 may have received it. 16:40:08  
5 Q Okay. All right. So let's look at the 16:40:09  
6 first page. So on the first page -- I'll zoom in 16:40:11  
7 a little bit to make it a little easier on 16:40:18  
8 everyone's eyes -- we see that this says there are 16:40:22  
9 seven competitive districts plus or minus 4 16:40:27  
10 percent. 16:40:30  
11 I assume that that means that under a 16:40:30  
12 4 percent competitiveness measure, there are seven 16:40:33  
13 competitive districts, correct? 16:40:37  
14 A Yes, there are seven competitive 16:40:41  
15 districts. 16:40:43  
16 Q Okay. And this is based upon -- or this 16:40:43  
17 column suggests that it's federal elections from 16:40:45  
18 2012 to 2020, correct? 16:40:48  
19 A Yes -- 16:40:49  
20 Q And I guess down here. 16:40:52  
21 A And it -- I think it's, yes, federal 16:40:53  
22 statewide elections. Yes. 16:40:57  
23 Q Federal statewide elections. Okay. 16:40:58  
24 A Yes. 16:41:00  
25 Q Okay. So federal elections from the 16:41:00

1 Presidential and U.S. Senate races between 2012 16:41:02  
2 and 2020 according to the note at the bottom of 16:41:06  
3 the page? 16:41:08  
4 A That's correct. 16:41:08  
5 Q Okay. Sorry. District 15 here, it says 16:41:09  
6 that -- well, actually, I guess to contextualize, 16:41:21  
7 these numbers would be the Republican percentage 16:41:24  
8 for this map in each of these districts based upon 16:41:27  
9 the data from federal elections from 2012 to 2020; 16:41:32  
10 is that right? 16:41:40  
11 A This -- yeah, I would say that this -- 16:41:40  
12 these are the, yeah, election results from -- for 16:41:44  
13 the races that are noted at the bottom from 2012 16:41:47  
14 to 2020. 16:41:50  
15 Q Okay. 16:41:52  
16 A Those -- those are Republican percentages. 16:41:53  
17 Q Okay. So based upon those -- or those 16:41:57  
18 2012 to 2020 elections that we've talked about, 16:41:59  
19 this map is -- is projected to have a Republican 16:42:02  
20 percentage vote of what's listed in these 16:42:10  
21 column -- in this column under FED 12 to 2020 for 16:42:13  
22 each district? 16:42:19  
23 A Could you -- could you rephrase -- or not 16:42:20  
24 rephrase. Could you restate your question. 16:42:24  
25 Q So this last column, federal 12 to 2020, 16:42:26

1 that -- that provides the projected -- or the 16:42:32  
2 projected Republican share of the vote for each of 16:42:39  
3 these created districts based upon if it were the 16:42:42  
4 same as the aggregate of the elections from 2012 16:42:45  
5 to 2020? 16:42:48

6 A So I would say that this does not -- this 16:42:49  
7 is not a projection. It's -- 16:42:53

8 Q Okay. 16:42:56

9 A -- merely a snapshot of election 16:42:56  
10 results -- 16:43:01

11 Q Ah, okay. Good -- 16:43:01

12 A -- from the elections -- 16:43:02

13 Q -- clarification. 16:43:02

14 A -- yeah, from the elections that are noted 16:43:03  
15 at the bottom -- 16:43:06

16 Q Okay. 16:43:07

17 A -- in the years that are noted in that 16:43:07  
18 column. 16:43:10

19 It's a snapshot. That's not to say that 16:43:12  
20 this is a projection for any of these districts. 16:43:15

21 Q Okay. Okay. So it's a snapshot if these 16:43:17  
22 districts under this aggregate had existed, this 16:43:20  
23 would have been -- or this would have been the 16:43:22  
24 result. 16:43:24

25 And so row 15 says 53.7, correct? 16:43:27



1 Q And where did this figure come from? 16:44:49

2 MR. McGUIRE: Objection, I'm going to 16:44:52

3 assert the legislative privilege. To the extent 16:44:54

4 that a member of the General Assembly or some 16:44:57

5 member of their staff provided this figure, if you 16:44:59

6 know, do not testify to that. You may answer as 16:45:03

7 to any other individuals. 16:45:06

8 BY THE WITNESS: 16:45:09

9 A This -- these percentages, just like the 16:45:10

10 others, were discussed internally. 16:45:12

11 MS. BENDER: Okay. And, again, I will say 16:45:14

12 the same thing as we said to the other objections, 16:45:15

13 we do not believe this is covered by the 16:45:18

14 legislative privilege, but we will move on. 16:45:20

15 BY MS. BENDER: 16:45:23

16 Q And when would this figure, 3.75 percent 16:45:26

17 to 3.8 percent, have been discussed? 16:45:29

18 A Sometime between November 9th and 16:45:33

19 November 15th. 16:45:36

20 Q Okay. And, again, before the 4 percent 16:45:37

21 figure, correct? 16:45:39

22 A Yes, before the 4 percent figure. 16:45:40

23 Q Okay. Were there any other options of how 16:45:44

24 to measure competitiveness considered beyond those 16:45:53

25 three? 16:45:57

1           A    The measurement of what is competitive is           16:45:57  
2           a very loose and subjective analysis.   Some will           16:46:10  
3           say plus or minus 5, some will say plus or minus           16:46:17  
4           10.   You know, there are Senate seats that exist           16:46:21  
5           today in the state Senate that are, you know, plus           16:46:25  
6           or minus 10 or more that members of the opposite           16:46:30  
7           party have won elections in.           16:46:36

8                        So are there other measures of           16:46:38  
9           competitive -- competitiveness?   Sure.   But what           16:46:45  
10          is the most accurate?   And this is an accurate           16:46:49  
11          measure, and that's kind of what we discussed.           16:46:56

12          Q    And did you consider other measures?           16:47:00

13          A    Yes.           16:47:03

14          Q    And what other measures did you consider?           16:47:11

15          A    So I think -- for example, in one of the           16:47:16  
16          introduced maps, House Bill 479, I think Chairman           16:47:22  
17          Oelslager referenced competitiveness and what he           16:47:28  
18          considered to be competitive and the metrics that           16:47:32  
19          he considered in -- in his sponsored testimony.           16:47:34

20          Q    And do you know what those metrics were?           16:47:41

21          A    Yes.           16:47:44

22          Q    Okay.   And what was -- what were those?           16:47:50

23          A    So his public testimony indicated that           16:47:52  
24          plus or minus 5 was competitive.           16:47:56

25          Q    Okay.   And was there anything beyond -- or           16:47:59

1 anything other than that? 16:48:01

2 A I think his comments were based on a 16:48:02

3 different data set, but other than that, I think 16:48:13

4 that covers it. 16:48:16

5 Q Okay. So no other metrics beyond the 16:48:17

6 5 percent that you just listed in this less than 16:48:20

7 3.75 percent, 3.75 to 3.8 percent, and 4 percent 16:48:24

8 that you know of? 16:48:27

9 A I would -- I would just add that there was 16:48:27

10 some public testimony from various groups and from 16:48:34

11 folks that aren't maybe directly affiliated with 16:48:37

12 -- of any types of group or organization that also 16:48:41

13 mention plus or minus 5 percent, plus or minus 16:48:47

14 4 percent. 16:48:51

15 There was a lot of public testimony on 16:48:51

16 what is competitive, and we've heard a lot about 16:48:54

17 the numbers that exist in these various documents 16:48:57

18 within plus or minus 5 percent. 16:49:03

19 Q Okay. So it seems likes, based upon these 16:49:05

20 documents, that there is initially a metric of 16:49:13

21 less than 3.75 percent and then a met of 3.75 to 16:49:15

22 3.8 percent and then a metric of 4 percent. 16:49:21

23 Why was there this -- did this shift take 16:49:24

24 place? 16:49:28

25 MR. McGUIRE: Objection, I'm going to 16:49:33

1 assert the legislative privilege to the extent 16:49:34  
2 that the answer would -- your answer would include 16:49:35  
3 that the shift took place as a result of input 16:49:39  
4 from any member of the General Assembly or a staff 16:49:42  
5 member of a member of the General Assembly. 16:49:44  
6 Other than that, you can answer. 16:49:46  
7 BY THE WITNESS: 16:49:52  
8 A So shifting from 3.75 to 3.8 to 4, that 16:49:52  
9 was all discussed internally. 16:49:58  
10 MS. BENDER: And, again, I respond the 16:50:00  
11 same as before. We do not believe this to be 16:50:02  
12 covered by the legislative privilege, but we will 16:50:04  
13 move on. 16:50:06  
14 BY MS. BENDER: 16:50:07  
15 Q All right. Looking back at the document. 16:50:15  
16 So this, again, says there's seven competitive 16:50:17  
17 districts at 3.75 to 3.8 percent, correct? 16:50:20  
18 A Yes, that's what it says. 16:50:23  
19 Q And this time, though, it lists 16:50:24  
20 District 15 as having 53.8 percent, correct? 16:50:27  
21 A It does, yes. 16:50:32  
22 Q And that's not the same as the 16:50:45  
23 53.7 percent listed on the previous page? 16:50:45  
24 A It's not, but I'll just give the caveat 16:50:47  
25 that -- I didn't draft this -- this document, but 16:50:50

1 I don't know what rounding mechanisms were used 16:50:53  
2 for all of these different things. I don't know 16:50:56  
3 if -- if that was just a rounding thing or not, 16:50:58  
4 but -- 16:51:02  
5 Q Okay -- 16:51:02  
6 A -- I -- 16:51:03  
7 Q -- so you don't know why this -- why 16:51:03  
8 there's the difference between those two? 16:51:06  
9 A Yes, I don't know -- yeah, I didn't draft 16:51:07  
10 it so I'm not familiar with that. 16:51:11  
11 Q Okay. All right. So let's look at this 16:51:13  
12 table down here. This appears to be comparing a 16:51:19  
13 few different indexes or aggregates for these 16:51:22  
14 districts. Do -- is that right? 16:51:29  
15 A Yes, it appears to be a comparison, yes. 16:51:30  
16 Q Okay. And looking at the first column 16:51:39  
17 titled "All 16 to 20," this means all statewide 16:51:44  
18 and federal elections between 2016 and 2020, 16:51:53  
19 correct? 16:51:56  
20 A Again -- 16:51:56  
21 Q All statewide. 16:51:59  
22 A Yeah, I would -- I would be specu- -- I 16:52:01  
23 didn't draft this, so -- I didn't put this 16:52:04  
24 together. 16:52:06  
25 Q Okay. So you don't know what "All 16 to 16:52:08

1 20" means? 16:52:13

2 A I think I know what it means, but, again, 16:52:16

3 I just want to caveat, I didn't draft this, so I 16:52:18

4 don't -- 16:52:22

5 Q Okay. What do you think it means, with 16:52:22

6 that caveat, of course? 16:52:24

7 A I -- well, I think that it means all 16:52:25

8 statewide and -- statewide federal elections from 16:52:29

9 '16, '18, and '20. 16:52:34

10 Q Okay. So you think it means all 16:52:36

11 statewide -- I just want to make sure I get this 16:52:39

12 correctly. All statewide state and federal 16:52:42

13 elections from 2016, 2018, and 2020? 16:52:44

14 A Yes. That's what I think that means, yes. 16:52:48

15 Q Okay. So if we're defining 16:52:50

16 competitiveness, as this document does -- so it's 16:52:55

17 plus or minus 3.75 percent to 3.8 percent -- which 16:53:00

18 in this column of these districts would fall in -- 16:53:06

19 fall in -- within that score? 16:53:08

20 A I'm sorry, what was the percentage that 16:53:09

21 you -- that you gave? 16:53:16

22 Q The 3.75 to 3.8 percent that we just 16:53:17

23 discussed that's up on the -- you know, that's 16:53:23

24 further up on this page. 16:53:26

25 A District -- well, District 1, 9, 10, 13, 16:53:28

1 15. I might have -- I just skimmed through, 16:53:50  
2 but... 16:53:54  
3 Q So 15 here says 53.9. So that wouldn't be 16:53:54  
4 within 3.75 or 3.8, right? 16:54:01  
5 A Yeah, it's hard to see that. 16:54:05  
6 Q No, that's okay. It's hard to see. I 16:54:07  
7 just wanted to clarify. 16:54:09  
8 So that would be four districts, though, 16:54:10  
9 you said: 1, 9, 10, and 13? 16:54:11  
10 A I'm having trouble seeing -- seeing this, 16:54:20  
11 so -- 16:54:23  
12 Q Let me see if I can zoom in a little bit 16:54:23  
13 more for you. 16:54:26  
14 Does that make it any better? 16:54:27  
15 A Yeah, that's better. 16:54:30  
16 Yeah. 16:54:32  
17 Q Okay. All right. Then let's look at the 16:54:33  
18 second column. Presidential R/D 20 only. 16:54:40  
19 This would just be the 2020 Presidential 16:54:46  
20 election Republican versus Democratic percent? 16:54:48  
21 A Yeah, it appears to be just the Republican 16:54:53  
22 and Democrats and not including any third party, 16:54:59  
23 from what -- 16:55:03  
24 Q Okay. And the same question as before, 16:55:04  
25 how many -- or which of these districts fall 16:55:07

1 within that 3.75 to 3.8 percent metric here? 16:55:09

2 A Five. 16:55:13

3 Q Can you name those? 16:55:20

4 A 1, 9, 10, 13, 15. 16:55:22

5 Q Okay. 16:55:30

6 A It's a real eye exam you're putting me 16:55:35

7 through. 16:55:38

8 Q I know. I know. Thank you for bearing 16:55:38

9 with me. Really, I'm an optometrist. That's my 16:55:40

10 day job. No, not really, of course. 16:55:47

11 And then let's look at the last column, 16:55:50

12 federal 12 to 2020. What the -- 16:55:54

13 A Yeah, so I -- sorry. 16:56:01

14 Q Go ahead. 16:56:04

15 A I would -- this is one that I actually -- 16:56:05

16 I don't know what this means -- what "I" means. I 16:56:09

17 don't know if that's actually an independent or if 16:56:13

18 that also includes green and any -- write in and 16:56:15

19 all that other stuff. I -- 16:56:19

20 Q Okay. 16:56:21

21 A -- actually have no idea what this is. 16:56:21

22 Q Okay. Well, let's skip over this column 16:56:23

23 and just go to federal 12 to 2020. 16:56:25

24 A Okay. 16:56:28

25 Q And do you take that to mean all statewide 16:56:29

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1	federal elections from 2012 to 2020?	16:56:32
2	A Yes, that's what I -- what I believe this	16:56:36
3	is, yes.	16:56:40
4	Q And under the same measure, how many of	16:56:40
5	those?	16:56:48
6	A Plus or minus 4 is seven.	16:56:50
7	Q Plus or minus -- under the same measure,	16:56:55
8	3.75 to 3.8.	16:56:59
9	A There's still seven.	16:57:09
10	Q Okay. In this District 15 that's now	16:57:26
11	53.8, wasn't the metric that we considered before,	16:57:30
12	the 3.75? Would that fall within?	16:57:34
13	A No.	16:57:39
14	Q All right.	16:57:39
15	MS. BENDER: Ethan, would you pull up --	16:57:47
16	or, actually, I think that I'm all set on this	16:57:49
17	document.	16:57:52
18	Ethan, would you pull up the document	16:58:00
19	titled "DiRossi008948."	16:58:01
20	(Exhibit management discussions were had	16:58:01
21	off the stenographic record.)	16:58:01
22	(WHEREUPON, Springhetti Exhibit No. 7 was	16:58:01
23	presented to the witness.)	16:59:38
24	MS. BENDER: Do you mind if we zoom in.	16:59:38
25		

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1	BY MS. BENDER:	16:59:47
2	Q We can just scan through this.	16:59:48
3	Mr. Springhetti, are you familiar with	17:00:06
4	this document?	17:00:12
5	A No, I'm not.	17:00:12
6	Q Have you ever seen this document?	17:00:13
7	A No.	17:00:14
8	MS. BENDER: Okay. Okay. I believe that	17:00:22
9	that is all of my questions.	17:00:22
10	Jyoti, would you like to ask any	17:00:25
11	questions?	17:00:28
12	MS. JASRASARIA: Hi. Sorry about that.	17:00:34
13	MS. BENDER: That's all right.	17:00:34
14	MS. JASRASARIA: No further questions on	17:00:38
15	behalf of the Adams Relators, but we did just want	17:00:40
16	to reiterate Ms. Bender's objection to the	17:00:44
17	indication to privilege during this deposition but	17:00:47
18	otherwise are happy to give people some time back.	17:00:49
19	MS. BENDER: If you wouldn't mind, I'd	17:00:56
20	like to take just two minutes before releasing	17:00:57
21	folks just to make sure that I've scanned --	17:01:01
22	scanned through my notes and got everything that I	17:01:04
23	wanted to ask you.	17:01:05
24	MR. McGUIRE: Literally two minutes.	17:01:07
25	MS. BENDER: Well, we have until -- we	17:01:13

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1	have three hours, correct?	17:01:15
2	MR. McGUIRE: Yeah, but you just said you	17:01:16
3	were finished and the other counsel has passed.	17:01:18
4	So, you know -- just as quickly as you can figure	17:01:20
5	out whether you have more questions, is all I'm	17:01:23
6	asking.	17:01:26
7	MS. BENDER: Okay. I will -- I will be	17:01:26
8	quick.	17:01:28
9	THE VIDEOGRAPHER: The time is 5:01. We	17:01:29
10	are off the record.	17:01:32
11	(WHEREUPON, a recess was had.)	17:01:33
12	THE VIDEOGRAPHER: The time is 5:03. We	17:03:11
13	are on the record.	17:03:14
14	MS. BENDER: Okay. I just wanted to	17:03:16
15	reiterate that we find the objections made thus	17:03:17
16	far unbased and that we believe that they	17:03:21
17	interfered with our full right to discovery and	17:03:26
18	within this deposition and, therefore, reserve the	17:03:31
19	right to challenge it before the Court. And we	17:03:33
20	would ask that we keep the deposition open for	17:03:35
21	that purpose.	17:03:38
22	MR. McGUIRE: I'm not sure that calls for	17:03:40
23	a response from me but noted, not consented to.	17:03:46
24	MS. BENDER: Okay. And no withdrawal of	17:03:50
25	any of your objections?	17:03:54

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1	MR. McGUIRE: No.	17:03:55
2	MS. BENDER: Okay. Then we will take that	17:03:56
3	we're at an impasse, and we can close for this	17:03:59
4	evening. Thank you.	17:04:02
5	MR. McGUIRE: All right. Thank you.	17:04:02
6	THE VIDEOGRAPHER: The time is --	17:04:02
7	MS. BENDER: Thank you for your time,	17:04:02
8	Mr. Springhetti.	17:04:07
9	THE VIDEOGRAPHER: -- 5:04 p.m. We are	17:04:07
10	off the record.	17:04:12
11	(WHEREUPON, the deposition was concluded	17:27:21
12	at 5:04 p.m. CST)	
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ACKNOWLEDGMENT OF DEPONENT

I, BLAKE SPRINGHETTI, do hereby  
acknowledge that I have read and examined the  
foregoing testimony and the same is a true,  
correct, and complete transcription of the  
testimony given by me and any corrections appear  
on the attached errata sheet signed by me.

-----  
(SIGNATURE) (DATE)

1           C E R T I F I C A T E   O F   R E P O R T E R

2  
3           I, MICHELLE M. YOHLER, a Certified  
4 Shorthand Reporter within and for the County of  
5 Will, State of Illinois, do hereby certify:

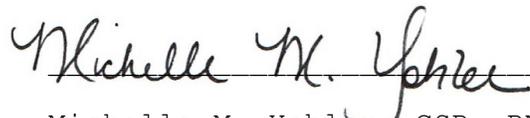
6           That previous to the commencement of the  
7 examination of the witness, the witness was duly  
8 sworn to testify the whole truth concerning the  
9 matters herein;

10          That the foregoing deposition transcript  
11 was reported stenographically by me, was  
12 thereafter reduced to typewriting under my  
13 personal direction and constitutes a true record  
14 of the testimony given and the proceedings had;

15          That the said deposition was taken  
16 remotely before me at the time and place  
17 specified;

18          That I am not a relative or employee or  
19 attorney or counsel, nor a relative or employee of  
20 such attorney or counsel for any of the parties  
21 hereto, nor interested directly or indirectly in  
22 the outcome of this action.

1           IN WITNESS WHEREOF, I do hereunto set my  
2 hand and affix my seal of office at Chicago,  
3 Illinois, this 8th day of December, 2021.  
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8             
9           Michelle M. Yohler, CSR, RMR, CRR  
10           Certified Shorthand Reporter  
11           CSR No.: 84-4531  
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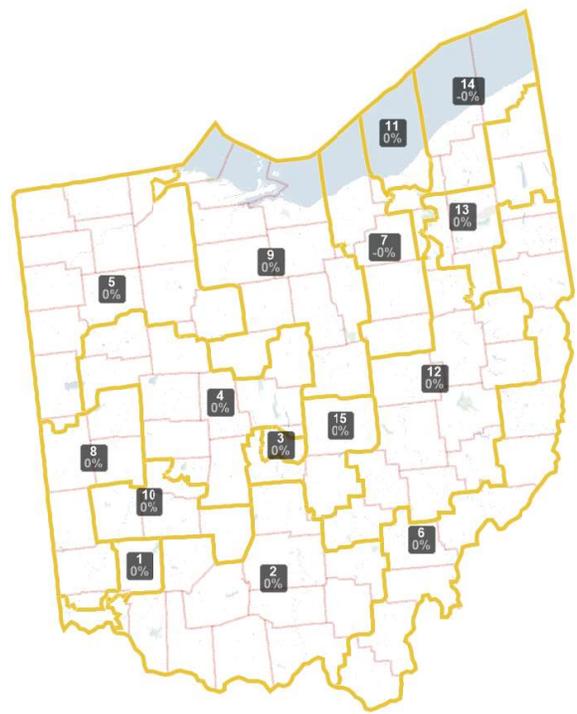
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1	99	5	1.0			7866301028.828	961.024	1703573.65391	7905614.818	7661.538	499719.2	4752.003	3829.385	5080.940	268817.8	7499.487	3055.238	3307.624	227756.8	3537.859	7088.707	9884.411	576371.2	3089.075	3630.644	5719.719	541747.1	71298.482	1122.922	1529.442	198839.2	3664.307	4371.288	4201.738	55629.1	2667.731	3068.918	1736.649	456412.0	
257	5	2	1.0			7866301277.623	669.083	1164903.57719	5164413.521	7669.219	1565570.7105	3825439.720	7761.947	94732776.3	5224.138	5649.343	3021.088	884858.7	2604.795	6963.527	5536.860	109016.0	7984.771	8844.852	8529.623	65790.6	7675.780	460.517	7950.088	126505.2	4229.022	29541.307	4038.905	364729.9	10.958	1189.328	1200.286	176898.9		
258	89	4	1.0			7866301930.898	1691.128	1333586.45780	0772526.595	2691.596	175299.9	3573.604	41492.410	7899.040	353948.75687	710242.095	3040.191	200977.19767	9263311.480	3843.002	284744.3	38632.397	0173.834	806.231	263916.9	1135.829	1823.508	1655.848	108919.9	9848.796	3187.584	7508.722	255545.7	1838.761	3985.301	1824.062	177019.9			
259	238	3	1.0			7866301747.435	1463.340	545401.75223	3573515.940	7463.590	158605.4	705.161	3939.380	8897.461	1234530.5	5313.385	5162.540	3671.731	221353.2	8788.892	8161.887	5000.210	349081.9	1789.474	5311.203	7100.682	335727.1	1637.476	1063.167	127.516	1078511.4	9727.928	1278.925	2773.726	316826.3	3672.718	3908.876	594177019.9		
260	241	15	1.0			7866301843.692	1297.800	905363.38439	8381532.970	5298.058	596637.7	3687.509	9976.874	3292.633	520814.0	5936.478	5338.261	7647.276	590781.4	2782.608	8389.782	7031.702	813630.1	11670.474	5655.532	7326.006	792508.9	1500.936	1079.529	1272.905	53811.4	14150.504	3510.629	15753.852	781595.3	3898.052	3309.986	1208.038	196110.3	
261	129	9	1.0			7866301619.949	1351.707	1540049.3	3870.421	5174.947	1351.983	370118.6	3136.705	1950.669	7798.106	380491.8	3597.273	3337.055	4637.561	1300022.8	6572.112	8321.066	1316.725	391943.9	7503.099	3464.848	3967.947	347423.0	1098.864	1276.675	51740.476	158610.6	4162.739	3441.705	3558.132	350698.4	3515.559	4183.664	1699.223	363071.9
513	92	8	1.0			7866301509.265	1113.337	926643.0	2320.767	5104.115	4113.623	366048.9	8146.718	1115.713	4992.756	785204.6	5392.465	5930.817	3063.942	753751.2	20829.467	4175.709	7093720.148	927088.4	3870.708	6288.919	3159.627	884461.8	437.495	1500.269	1123.149	163770.0	2096.160	7642.673	3026.735	386232.3	3321.289	7089.816	1301.105	375348.4
514	4	1	1.0			7866301980.447	119.401	533577.55121	9012720.407	4119.540	341910.6	1110.129	7085.331	3387.825	346478.4	43594.211	1528.916	1469.917	325547.5	7103.725	5705.367	9895.879	438341.9	7902.885	3903.572	1806.457	394782.6	1777.358	1720.522	265.835	197673.8	2725.054	7351.645	4348.897	406895.5	1775.990	3367.785	1143.775	118100.4	
515	94	10	1.0			7866301993.189	752.005	931461.9	3980.365	1110.478	752.236	57897.13974	4147478.854	7831.777	533467.1	1889.514	4744.476	1085.483	505784.5	9008.286	3803.635	5264.893	805678.3	34956.880	3516.780	9473.660	806042.1	14084.528	1579.589	9111.453	39164.2	2425.958	7185.062	7207.269	769345.1	13111.437	9656.944	1988.861	172076.7	
769	159	11	1.0			7866301803.814	106.823	542240.1	1240.183	4152.288	7187.085	189440.0	9377.429	3331.321	3606.844	143931.6	8916.947	3399.143	3607.244	137744.6	8550.317	2561.794	3357.041	388783.9	99625.57	1929.041	1554.588	308301.6	4468.039	157.784	2233.084	12691.9	3911.75	13255.500	3775.116	207577.2	7474.920	356.692	11112.22731.9	
770	251	13	1.0			7866301458.189	819.888	93051.78347	4692830.267	5820.231	1577381.731	157.682	2931.033	3507.117	548818.6	63174.286	5368.170	4857.251	1505567.0	9937.610	7583.835	4953.466	752351.6	6075.847	4966.903	5940.759	738236.2	1280.208	873.367	114.941	144337.8	5790.624	5955.249	1267.752	594685.3	3083.702	1220.015	1503.717	2545470.3	
771	248	14	1.0			7866291705.577	49.926	657258.3	3787.246	3581.821	7650.174	459273.8	7531.551	3983.995	4278.525	40299.64571	1893439.680	1578.048	376104.5	7674.744	200.196	5672.261	552694.7	8523.011	6953.717	5476.728	546697.2	3662.619	1737.388	1047.631	184162.0	3430.724	1433.868	3135.745	501396.3196	8293969.310	1166.138	177074.7		
1025	18	6	1.0			7866301154.351	1323.834	1483880.3	7637.814	1549.439	4324.458	322670.8	4855.416	3646.414	6554.491	365200.6	65970.249	7537.628	3826.103	354200.4	45935.966	9414.573	9473.872	163241.5	15938.550	9357.166	3395.716	132470.8	1323.498	1056.040	1166.418	113874.5	4812.624	3062.966	1190.804	124576.3	7342.801	13477.724	1820.525	45361.4
1281	157	7	1.0			7866291253.578	1954.151	851723.0	4740.545	4784.723	4954.615	593401.3	17771.229	1862.923	3645.606	598564.2	2806.590	3389.509	7415.622	59960.9	9252.103	5262.505	380.159	780312.2	7097.577	2235.376	3332.953	769155.2	1138.257	3177.444	15129.477	88977.3	35087.395	3840.528	1198.153	720841.5	2519.980	159.079	1719.077	1939.1
1282	34	12	1.0			7866301123.193	7329.134	1690002.6	2555.430	1125.319	7329.575	495270.9	5630.717	8990.324	2045.862	299811.0	3845.587	4409.961	1811.860	336960.3	7565.183	7472.430	1082.661	446759.8	6186.134	4888.466	1074.579	418998.0	7298.764	261.035	7458.425	171949.5	53807.150	9040.914	143540.472	366246.2	2302.556	5001.376	1203.931	335223.1

s1.map - Block-VTD-County



District	New
Population	0
Change - Population	0
Ideal Value	-786,630
Deviation	-786,630
% Deviation	-100%

Redistricting ToolBox - s1

Target: New District

Source: All

Selection Layer: County

Theme: None



Exhibit #  
**Springhetti 01**  
 12/07/2021 - ER





ID	DATA	District	Members	Locked	Name	TOTPOP	G20R	G20V	G20V_TAPR
1	99	5	1			786630	549028.83	397661.02	1703573.6
257	5	2	1			786630	530277.62	397669.08	1164903.5
258	89	4	1			786630	534930.9	412691.13	1333586.4
259	238	3	1			786630	523747.44	370463.34	545401.7
260	241	15	1			786630	528843.69	386297.8	905363.3
261	129	9	1			786630	527619.95	381351.71	1540049.3
513	92	8	1			786630	530509.27	394113.34	926643
514	4	1	1			786630	557980.45	404119.4	533577.5
515	94	10	1			786630	544393.2	397752.01	931461.9
769	159	11	1			786630	550803.81	357186.82	542240.1
770	251	13	1			786630	538458.2	406819.99	933051.7
771	248	14	1			786629	552705.58	437649.93	657258.3
1025	18	6	1			786630	551154.35	394323.83	1483880.3
1281	157	7	1			786629	534253.58	404954.15	851723
1282	34	12	1			786630	519123.19	377329.13	1690002.6

<b>G20P_DV</b>	<b>G20P_RV</b>	<b>G20P_TV</b>	<b>G20P_RP</b>	<b>G12P_DV</b>	<b>G12P_RV</b>	<b>G12P_TV</b>	<b>G12P_RP</b>
155391.79	235614.82	397661.54	1499719	184752	193829.39	386080.94	1268818
127719.52	264413.52	397669.22	1156557	137105.38	216439.72	359761.95	927776.3
155780.08	250526.6	412691.6	1175300	140573.6	211492.41	357899.04	1053949
265223.36	99515.94	370463.59	198605.4	230705.16	113939.38	349897.46	234530.5
178439.84	201532.97	386298.06	696637.7	160687.51	166976.87	333292.63	620814
138870.42	236174.95	381351.98	1370119	180136.71	181950.67	369798.11	1080492
142320.77	246104.12	394113.62	866048.6	138146.72	221115.71	364992.76	785204.6
205121.9	192720.41	404119.54	341910.6	181110.13	187085.33	373387.83	346478.4
180980.37	210110.48	397752.24	675897.1	183974.41	197478.85	387831.78	633467.1
279240.18	74152.288	357187.09	169440	319877.43	70321.321	393606.94	143931.6
188347.47	212930.27	406820.23	677381.7	203137.68	173931.03	383507.12	548818.6
198797.25	233581.82	437650.17	459273.8	197531.55	200984	404278.53	404399.6
147637.81	241549.44	394324.46	1322671	204853.42	173646.41	385654.49	965200.6
174740.55	224784.72	404954.62	693401.3	177771.23	181862.92	365645.61	598564.2
140555.43	231125.32	377329.58	1495271	185630.72	168990.32	362045.86	1099811

<b>G12S_DV</b>	<b>G12S_RV</b>	<b>G12S_TV</b>	<b>G12S_RP</b>	<b>G14G_DV</b>	<b>G14G_RV</b>	<b>G14G_TV</b>	<b>G14G_RP</b>
177499.49	183055.24	378307.62	1227757	63537.859	137088.71	206984.41	1576371
136224.04	196649.34	350021.09	868458.7	52604.795	146968.53	205536.86	1109016
136687.71	199242.1	352040.19	1020097	49767.926	153311.48	208843	1284744
226313.99	105162.54	343671.73	221353.2	78788.892	88161.887	176000.21	349081.9
155936.48	155338.26	327647.28	590781.4	52782.6	118389.78	177031.7	813630.1
173597.27	170337.06	364637.56	1030003	66572.112	138321.07	211316.73	1391944
136392.47	205930.82	358063.94	753751.2	50829.467	144176.71	199720.15	927088.4
180594.02	171528.92	365469.92	325547.5	67103.725	125706.37	199895.88	438341.9
181689.51	184744.48	381085.48	605784.5	69008.286	143803.64	218264.89	805678.3
299816.95	63299.143	373607.24	137744.6	108550.32	72561.794	190357.04	308763.9
199174.29	155368.17	374857.25	505567	69937.601	127583.54	204953.46	752251.6
194571.19	178439.68	391576.05	376104.5	67674.744	160209.2	235672.28	552694.7
206970.25	147537.63	372826.1	854200.4	85935.966	124914.57	218473.87	1163242
176806.69	163389.51	357415.62	559960.9	58252.103	135262.51	200380.16	780312.2
178845.59	154409.96	354811.86	1036960	67565.183	127472.43	201082.66	1446760

<b>G14A_DV</b>	<b>G14A_RV</b>	<b>G14A_TV</b>	<b>G14A_RP</b>	<b>G14I_DV</b>	<b>G14I_RV</b>	<b>G14I_TV</b>	<b>G14I_RP</b>
73089.075	133630.64	206719.72	1541748	68298.482	121122.92	201529.44	1439839
67984.771	138844.85	206829.62	1065751	57675.78	134460.52	202950.09	1026505
58632.397	150173.83	208806.23	1263917	54135.829	142825.51	206655.85	1208920
91789.479	85311.203	177100.68	335727.1	90637.476	78063.167	175217.52	307851.4
61670.474	115655.53	177326.01	792508.9	58500.936	109079.53	175272.91	753811.1
77503.099	133464.85	210967.95	1347423	73098.864	122276.68	206740.48	1258611
63870.708	136288.92	200159.63	884461.8	54437.495	133500.27	198123.15	863770
87902.885	113903.57	201806.46	394782.6	73777.358	113720.52	197265.84	397673.8
74956.88	143516.78	218473.66	806042.1	74084.328	130579.59	214911.45	739164.2
119625.56	71929.041	191554.6	308301.6	129468.04	51157.784	187233.08	212691.9
80075.847	124966.9	205042.75	738236.2	84280.208	107873.37	201114.94	644337.8
78523.011	156953.72	235476.73	546697.2	83662.619	135737.39	229047.63	484162
99038.55	119357.17	218395.72	1132471	98323.498	105056.04	214166.42	1013875
67097.577	132235.38	199332.95	769155.2	71138.257	115377.44	195529.48	688977.3
76186.134	124888.45	201074.58	1418998	77298.764	110261.04	197458.43	1271950

<b>G14T_DV</b>	<b>G14T_RV</b>	<b>G14T_TV</b>	<b>G14T_RP</b>	<b>G14J_DV</b>	<b>G14J_RV</b>	<b>G14J_TV</b>	<b>G14J_RP</b>
59640.307	134371.29	204201.74	1556329	82667.731	123068.92	205736.65	1456412
54229.022	139541.31	204038.91	1064730	66010.958	140189.33	206200.29	1076899
49848.796	148187.58	207508.72	1255546	71838.761	135985.3	207824.06	1175243
87927.928	81278.925	176273.73	316826	106672.72	69908.876	176581.59	277019.9
54150.504	113510.63	175755.85	781595.9	75898.052	100309.99	176208.04	696110.3
64162.739	133441.71	208558.13	1350698	86515.559	124183.66	210699.22	1263072
52096.16	137642.67	199026.74	886232.3	63211.289	137089.82	200301.11	875348.4
72725.094	117351.65	199438.9	406895.6	81775.99	119367.79	201143.78	418100.4
70425.958	137185.06	217207.27	769345.1	91311.437	125656.94	216968.38	712076.7
133911.75	50255.5	190775.12	207577.2	137474.92	52636.692	190111.61	227731.9
75790.024	116955.25	202367.75	694685	94083.702	110220.02	204303.72	665470.3
78430.724	141433.87	230319.75	501396.8	100196.83	133969.31	234166.14	477074.7
84812.624	119092.97	215190.8	1124576	97342.801	119477.72	216820.53	1145361
66087.395	120840.53	196198.15	720841.5	82519.98	116199.1	198719.08	701939.1
69807.15	119040.91	198540.47	1366246	85202.556	115001.38	200203.93	1335223

<b>G16P_DV</b>	<b>G16P_RV</b>	<b>G16P_TV</b>	<b>G16P_RP</b>	<b>G16S_DV</b>	<b>G16S_RV</b>	<b>G16S_TV</b>	<b>G16S_RP</b>
142499.31	213219.05	376509.55	1443814	121749.55	229262.47	368661.13	1521596
109851.33	237604.6	363172.16	1106110	89720.06	255809.23	360157.19	1129166
124132.75	220749.26	361956.4	1151755	96252.22	247769.32	359128.21	1251201
235649.26	97818.764	350029.56	205593	196748.25	131522.27	342561.99	278323
145606.62	177889.67	339744.54	683787.3	121323.34	198149.74	334677.26	746969
130160.68	208414.8	357462.83	1291734	112711.28	218805.17	351698.28	1355080
122887.64	229034.79	367161.05	850919	96376.709	250186.08	361516.21	914609.7
176899.24	178833.61	372306.04	347121	138937.42	210661.42	364921.27	411740.5
161192.15	198195.35	376795.29	669560.3	128714.27	227658.14	372513.09	764823
280926.55	65951.479	357073.3	149400	237676.78	86251.667	340758.66	200638.5
167078.72	188808.19	372364.71	650322.5	140995.12	200954.21	362743.45	688544.4
169721.16	208854.41	395231.76	448367.9	134358.58	229971.26	384028.42	496617.5
144133.82	219001.25	377892.7	1258678	140373.21	208665.42	368194.9	1194014
149659.32	193621.14	359649.43	664379.5	121433.75	211895.58	352312.28	714942.3
132763.07	202483.39	351240.28	1400330	117328.49	208305.7	345203.63	1431455

G18S_DV	G18S_RV	G18S_TV	G18S_RP	G18G_DV	G18G_RV	G18G_TV	G18G_RP
143901	147570.62	291471.61	1282903	119388.33	165194.93	294284.79	1413670
116598.05	173997.85	290595.89	993901.5	99000.946	184771.71	292534.78	1050643
134949.92	169995.76	304945.68	1048167	113510.09	184726.29	306594.1	1129300
218444.52	75349.982	293794.5	185636.2	204886.98	83878.65	295480.07	204845.7
147208.5	132256.31	279464.81	612885.2	132039.22	141950.48	281080.45	653892
136366.61	143333.5	279700.11	1133431	114053.67	155892.75	280662.61	1221591
121179.15	168319.75	289498.91	781973.5	103758.24	177232.56	289985.99	823058.2
166133.33	142903.79	309037.12	330396.3	149735.27	152127.05	310412.38	348652.4
156827.99	146444.68	303272.67	608582.6	133073.21	162247.98	304572.48	669498.2
232922.01	46863.241	279785.25	132939.6	219676.88	54943.691	281038.43	155532.8
166998.61	135325.23	302323.84	566648.4	148616.32	143857.07	302072.63	599345
174841.29	151810.84	326652.14	392132.5	150798.55	167855.88	327866.91	430254.4
151442.99	142924.99	294367.98	1045992	130127.02	156848.72	295181.66	1148803
153346.46	140973.53	294319.99	597253.7	133394.65	153981.24	295997.62	638066.8
136524.64	139188.8	275713.43	1209636	117226.63	149991.69	276582.17	1297702

<b>G18A_DV</b>	<b>G18A_RV</b>	<b>G18A_TV</b>	<b>G18A_RP</b>	<b>G18I_DV</b>	<b>G18I_RV</b>	<b>G18I_TV</b>	<b>G18I_RP</b>
121649.84	167330.83	288980.67	1459466	111384.74	163535.69	287037.91	1429975
100747.09	188014.56	288761.65	1089188	95198.301	179717.55	287187.77	1035774
109842.92	193623.99	303466.9	1187945	110000.7	181174.29	301891.97	1130991
199350.33	92293.612	291643.94	228878.5	199838.68	78581.033	288704.96	196153
126122.97	150200.97	276323.95	701321.2	130335.35	135288.01	275240.38	631777.1
115609.35	160822.04	276431.39	1281530	109714.44	153390.35	274795.4	1223833
105926.75	178434.77	284361.52	851863.1	97371.001	177333.04	287014.51	840815.3
154222.05	151882.35	306104.4	354577.4	141968.46	148618.68	305006.12	345979.1
136228.13	164322.96	300551.1	688528.2	129191.69	156820.85	298985.36	657022.6
224263.68	52864.433	277128.11	153111.7	213588.7	48983.68	273136.28	141178.3
150224.14	146498.5	296722.64	626399.8	142783.07	139598.26	295082.57	596196
157544.19	164789.58	322333.78	435077.7	145698.55	157921.98	317262.86	418287.3
129094.51	160599.41	289693.92	1184401	127986.36	149043.97	287905.94	1106724
135956.63	151380.67	287337.3	652302.1	128616.45	146634.88	287156.67	627390.4
119175.47	153006.52	272181.99	1348493	123887.24	139688.8	273412.84	1207929

<b>G18T_DV</b>	<b>G18T_RV</b>	<b>G18T_TV</b>	<b>G18T_RP</b>	<b>G18J_DV</b>	<b>G18J_RV</b>	<b>G18J_TV</b>	<b>G18J_RP</b>
117096.44	162866.26	287720.32	1421844	114223.95	172449.69	286673.63	1495409
98799.608	182094.67	288175.91	1054439	96981.776	189071.18	286052.95	1091651
110969.81	184700.98	302755.53	1143565	108680.97	191538.44	300219.41	1188847
199966.73	84434.948	290344.06	209649.5	196901.26	91160.674	288061.93	228416.5
127685.56	142446.19	276255.64	664441.8	125115.83	149206.89	274322.72	699412
112723.92	155986.46	276360.02	1240142	110867.19	163172.27	274039.47	1304992
104954.46	176198.4	288151.46	829007.6	103452.29	182851.86	286304.15	861468.3
150997.32	149014.82	307406.71	344947.6	147335.39	157125.09	304460.48	366831.8
135477.75	158228.64	300901.36	660784.9	134430.14	164829.37	299259.51	691105.4
219570.69	51420.331	276410.28	148149.7	218245.07	56667.921	274913	162378.6
146655.43	146075.52	299447.52	613861.5	144673.18	150468.65	295141.83	641108.9
151087.17	162988.41	321424.94	427748.5	145921.07	171694.41	317615.48	453595.8
126287.66	156961.05	290165.93	1153836	129823.66	156878.63	286702.29	1170996
132670.39	150460.69	290028.68	639259.8	129047.47	157883.6	286931.06	670983.8
116406.62	150047.1	273213.22	1311916	117753.31	153063.87	270817.17	1350158

EA51_DV	EA51_RV	EA51_TV	EA51_RP	EA52_DV	EA52_RV	EA52_TV	EA52_RP
139447.77	206525.6	345973.36	1480662	138588.48	190155.35	328743.83	1453524
115726.39	229375.54	345101.93	1079585	115083.53	212496.04	327579.56	1083956
125751.13	233891.58	359642.71	1198071	131110.5	210849.57	341960.07	1161874
217534.92	115436.85	332971.76	255879.8	227478.42	92996.177	320474.6	211183.4
147153.78	186535.48	333689.27	715636.7	151555.09	164597.83	316152.92	676834.8
135218.84	195788.37	331007.22	1297935	131926.93	182298.95	314225.87	1277789
118304.11	223745.68	342049.79	871813.2	121097.02	203598.22	324695.24	850665.4
165396.32	191869.63	357265.95	381507.6	171667.52	169980.6	341648.12	353779.3
150457.53	200704.85	351162.38	715946.3	155307.08	180325.38	335632.46	676352.2
244097.03	75015.674	319112.7	190002.5	246825.15	59596.178	306421.32	154201.3
169001.78	185444.62	354446.4	656858.1	169892.51	167095.96	336988.47	628022.6
169730.61	213027.96	382758.57	468906.3	175963.35	188497.99	364461.34	438367.5
157913.89	186839.16	344753.05	1154264	147477.61	180751.7	328229.3	1179705
152117.03	198359.02	350476.05	687941.7	155629.27	176687.45	332316.71	656026.7
140986.97	185968.93	326955.9	1352655	136726.29	173438.35	310164.64	1339058

Deviation	% Deviation	District Number	EA53	% G20P_RV	% EA51_RV	% EA52_RV	Ideal Value
0	0	5	59.08879	0.592501	0.596941	0.57843	786630
0	0	2	66.50253	0.664908	0.66466	0.648685	786630
0	0	4	63.16555	0.607055	0.650344	0.616591	786630
0	0	3	30.33022	0.268625	0.346687	0.290183	786630
0	0	15	53.66239	0.521703	0.55901	0.520627	786630
0	0	9	59.61713	0.61931	0.591493	0.580153	786630
0	0	8	64.14315	0.62445	0.654132	0.627044	786630
0	0	1	50.90107	0.47689	0.53705	0.497531	786630
0	0	10	55.07358	0.528245	0.571544	0.53727	786630
0	0	11	20.19732	0.207601	0.235076	0.194491	786630
0	0	13	51.19096	0.523401	0.523195	0.495851	786630
-1	-0.000001	14	53.58486	0.533718	0.55656	0.517196	786630
0	0	6	56.48309	0.612565	0.541951	0.550687	786630
-1	-0.000001	7	54.88716	0.555086	0.56597	0.531684	786630
0	0	12	57.65107	0.612529	0.568789	0.559182	786630

**District Label**

- 5|0%
- 2|0%
- 4|0%
- 3|0%
- 15|0%
- 9|0%
- 8|0%
- 1|0%
- 10|0%
- 11|0%
- 13|0%
- 14|-0%
- 6|0%
- 7|-0%
- 12|0%

**From:** Springhetti, Blake

**Sent:** Monday, November 15, 2021 6:53 PM

**To:** Morrison, Christine; Disantis, Paul

**Subject:** content

**Attachments:** Substitute Senate Bill 258.HighlightBrief.docx; Substitute Senate Bill 258.HighlightBrief.pdf; Substitute Senate Bill 258.Memo.docx; Substitute Senate Bill 258.Memo.pdf

The highlight brief is skimmed down with non-constitutional facts added. The memo is the same document I sent earlier that has a lot more information.

Blake

**Exhibit #**

**Springhetti 03**

exhibitsticker.com

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Springhetti000217

## Substitute Senate Bill 258: A Congressional Redistricting Plan

### Highlights and Key Facts

#### *County Splits*

- Sub. Senate Bill 258 includes 76 whole counties, which is more whole counties than any Ohio congressional plan approved in over 50 years.
- Sub. Senate Bill 258 splits less counties than the House Democrat proposal and Senate Democrat proposal.
- The Ohio Constitution allows for 23 split counties, this plan splits only 12.
- The map approved in 2011 split 23 counties.
- Each congressional district that is not wholly contained in a single county includes at least one whole county within the congressional district boundary.

#### *County Subdivisions Splits*

- Sub. Senate Bill 258 splits 14 subdivisions – the House Democrat plan split 21 subdivisions.
- *Columbus*: Approximately 70 percent of Columbus and the subdivisions circumscribed by Columbus, is within Congressional District 3. Columbus is larger than one ratio of representation and must be split into at least two congressional districts.
  - *A higher percentage than both democrat proposals.*
- *Cleveland*: First split in congressional plans dating back to the late 1800s, Cleveland is wholly contained within Congressional District 11.
- *Cincinnati*: Wholly contained within one congressional district for the first time in over 100 years.
- *Akron*: Currently divided into two congressional districts, is wholly contained within Congressional District 13.
- *Dayton*: Wholly contained within Congressional District 10 and is paired with Wright-Patterson Air Force Base.
- *Toledo*: Currently divided into two congressional districts, is wholly contained within Congressional district 9.
- Only three of the top one-hundred most populous cities are split.

*Partisan Leanings*

- Sub. Senate Bill 258 could create six republican leaning congressional districts, seven competitive congressional districts and two democrat leaning congressional districts.
- Under this plan, in a good election year in which republicans recruit good candidates, republicans can win more than eleven of fifteen districts.
- Sub. Senate Bill 258 would create more competitive congressional districts than any proposal introduced in the General Assembly.
- In the House democrat proposal, eight of fifteen congressional districts would favor one political party by over 60 percent.

*Incumbents*

- The House democrat proposal paired seven of twelve republican incumbents, clearly unduly disfavoring republican incumbents.
- Cincinnati must be whole and two incumbents live within city limits. Each proposed congressional plan introduced pairs those two incumbents.
- Otherwise, Sub. Senate Bill 258 would *not* pair any republican or democrat incumbent (that is assumed to be running for reelection to Congress) into a single congressional district.

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For at least the next decade, Ohio will have fifteen Representatives to Congress, down from sixteen over the past decade. Ohio's population is 11,799,448 and when divided by fifteen equals 786,629.8. To achieve the lowest deviation from 786,629.8, the plan consists of thirteen congressional districts with a population of 786,630 and two congressional districts (Congressional District 6 and Congressional District 12) with a population of 786,629.

The Ohio Constitution clarifies county subdivision boundaries that perforate multiple counties are considered to be separate subdivisions and are not split. Example: Dublin City exists in three counties – Franklin, Delaware and Union. All three portions of Dublin can be in three different congressional districts and is not considered to be split. The same applies to any noncontiguous portions of a subdivision.

It is important to note that the language referencing statewide partisan elections over the last decade in Article XI, section 6, (B), part of the rules for drawing a legislative redistricting plan does not exist in Article XIX or apply to drawing congressional district plans. Substitute Senate Bill 258 complies with all mandatory requirements of Article XIX of the Ohio Constitution and the Voting Rights Act. The plan also achieves certain aspirational sections of Article XIX.

### Article XIX requirements for drawing Congressional Districts

- Article XIX, section 2, (B)(4)(a), specifies a congressional district plan shall attempt to include a “significant” portion of any municipal corporation or township in a single congressional district that qualifies with the criteria in that section, which today only applies to Columbus.
- In determining the population of Columbus, this section specifies that county subdivisions circumscribed by the jurisdiction are to be included in the population count.
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- Congressional districts shall be contiguous and compactness shall be attempted.
- If a congressional district contains territory within a split county, the territory within that county must be contiguous.
- No two congressional districts can share territory of more than one county, except for counties with population over 400,000. This rule does not apply to the following counties -- Franklin, Cuyahoga, Hamilton, Summit, Montgomery and Lucas.
- The authority drawing congressional districts shall attempt to include at least one whole county in each congressional district, except for congressional districts wholly contained within one county or that cannot be drawn in that manner while complying with federal law.
- If passed with a simple majority vote, the plan shall not unduly favor or disfavor a political party or its incumbents.
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- The authority drawing congressional districts shall attempt to include at least one whole county in each congressional district, except for congressional districts wholly contained within one county or that cannot be drawn in that manner while complying with federal law.
- If passed with a simple majority vote, the plan shall not unduly favor or disfavor a political party or its incumbents.
- The plan shall not unduly split governmental units, giving preference to counties, and then townships and municipal corporations.



### County and Political Subdivision Splits

- Three counties - Franklin, Cuyahoga and Hamilton - all of which have a population greater than one ratio of representation - must be split due to population requirements.
- Sub. Senate Bill 258 includes 76 whole counties and 12 split counties, with two counties split between three congressional districts (Cuyahoga and Hamilton).
- The map approved in 2011 split 23 counties total, with 2 counties split between four congressional districts and 5 counties split between three congressional districts.
- Each congressional district that is not wholly contained in a single county includes at least one whole county within the congressional district boundary.
- Sub. Senate Bill 258 splits less counties than the House Democrat proposal, Senate Democrat proposal and the contest winner map.
- Sub. Senate Bill 258 splits 14 subdivisions – the House Democrat plan split 21 subdivisions.
- Sub. Senate Bill 258 splits the below counties and subdivisions
  - *Clark County: Mad River Township*
  - *Cuyahoga County: Rocky River and Oakwood*
  - *Fairfield County: Columbus (counts as a split because the city boundary within the county is split between two congressional districts)*
  - *Franklin County: Columbus*
  - *Hamilton County: Glendale and Sycamore Township*
  - *Holmes County: Berlin Township*
  - *Lorain County: Columbia Township*
  - *Ross County: Union Township*
  - *Shelby County: Green Township*
  - *Summit County: Cuyahoga Falls*
  - *Washington County: Belpre Township*
  - *Wood County: Perrysburg Township*

### Urban Cities

- *Columbus*: Approximately 70 percent of Columbus and the subdivisions circumscribed by Columbus, is within Congressional District 3, with a small portion within Congressional District 15. Columbus is larger than one ratio of representation and must be split into at least two congressional districts.
  - A higher percentage than both democrat proposals.
- *Cleveland*: Wholly contained within Congressional District 11.
- *Cincinnati*: Wholly contained within Congressional District 1.
- *Akron*: Wholly contained within Congressional District 13.
- *Dayton*: Wholly contained within Congressional District 10.
- *Toledo*: Wholly contained within Congressional district 9.

## Ten-year Election Results, Partisan Leanings and Incumbents

### Ten-year Election Results

- The below statistics were developed using statewide federal election data over the last ten years.
  - Presidential races in 2012 (**Obama vs Romney**), 2016 (**Trump vs Clinton**) and 2020 (**Trump vs Biden**)
  - US Senate Races in 2012 (**Brown vs Mandel**), 2016 (**Portman vs Strickland**) and 2018 (**Brown vs Renacci**)

District	Population	Deviation	FED Election Data
1	786,630	0	51.5
2	786,630	0	65.1
3	786,630	0	30.4
4	786,630	0	66.0
5	786,630	0	58.8
6	786,629	-1	52.9
7	786,630	0	56.7
8	786,630	0	62.0
9	786,630	0	47.7
10	786,630	0	52.2
11	786,630	0	19.4
12	786,629	-1	61.3
13	786,630	0	48.6
14	786,630	0	53.2
15	786,630	0	53.7

*Note: Uses Federal election data from Presidential and U.S. Senate races between 2012 and 2020*

*Note: Prior election results do not guarantee future election outcomes*

### *Partisan Leanings*

- Sub. Senate Bill 258 could create six republican leaning congressional districts, seven competitive congressional districts and two democrat leaning congressional districts.
- Congressional districts are considered competitive if the district leans politically toward one party by four percent or less.
- Congressional Districts 2, 4, 5, 7, 8 and 12 could lean republican by 54 percent or more.
- Congressional Districts 1, 6, 9, 10, 13, 14, and 15 could lean +/- four percent.
- Congressional Districts 3 and 11 could lean democrat by 54 percent or more.
- Sub. Senate Bill 258 would create more competitive congressional districts than any proposal introduced in the General Assembly.

### *Incumbents*

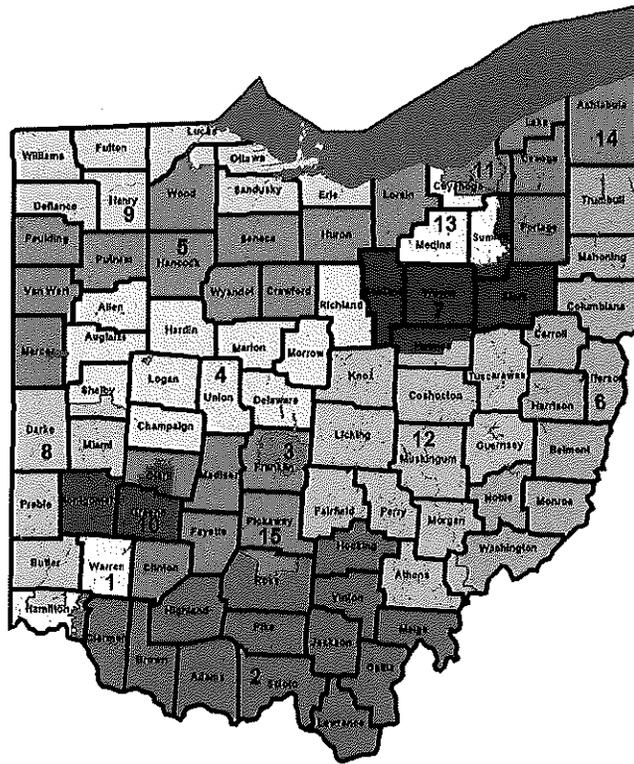
- Cincinnati must be whole and two incumbents live within city limits. Each proposed congressional plan introduced pairs those two incumbents.
- Otherwise, Sub. Senate Bill 258 would not pair any republican or democrat incumbent (that is assumed to be running for reelection to Congress) into a single congressional district.

CD #	Population	Deviation	FED 12 to 20
1	786,630	0	51.5
2	786,630	0	65.1
3	786,630	0	30.4
4	786,630	0	66.0
5	786,630	0	58.8
6	786,629	-1	52.9
7	786,630	0	56.7
8	786,630	0	62.0
9	786,630	0	47.7
10	786,630	0	52.2
11	786,630	0	19.4
12	786,629	-1	61.3
13	786,630	0	48.6
14	786,630	0	53.2
15	786,630	0	53.7

**7 Competitive Districts**  
+/- 4%

*Note: Uses Federal election data from Presidential and U.S. Senate races between 2012 and 2020*

*Note: Prior election results do not guarantee future election outcomes*



8/20/2008



## Substitute Senate Bill 258

### Highlights and Key Facts

For at least the next decade, Ohio will have fifteen Representatives to Congress, down from sixteen over the past decade. Ohio's population is 11,799,448 and when divided by fifteen equals 786,629.8. To achieve the lowest deviation from 786,629.8, the plan before you consists of thirteen districts with a population of 786,630 and two districts (district 6 and district 12) with a population of 786,629.

The Ohio Constitution clarifies subdivision boundaries that perforate multiple counties are considered to be separate subdivisions and are not split. Example: Dublin City exists in three counties – Franklin, Delaware and Union counties. All three pieces of Dublin can be in three different districts and is not considered to be split. The same applies to any noncontiguous portions of a subdivision.

Substitute Senate Bill 258 Complies with all mandatory requirements of Article XIX of the Ohio Constitution. The plan also achieves certain aspirational sections of Article XIX.

### Requirements of Article XIX in drawing Congressional Districts

- Article XIX, section 2, (B)(4)(a), specifies a congressional district plan shall attempt to include a “significant” portion of any municipal corporation or township in a single district that qualifies with the criteria in that section, which today only applies to Columbus.
- In determining the population of Columbus, this section specifies that county subdivisions circumscribed by the jurisdiction are to be included in the population count.
- Approximately 70 percent of Columbus is within one congressional district, a percentage cited as significant in public testimony before the Ohio Redistricting Commission.
- Article XIX, section 2 (B)(4)(b), which today applies to Cleveland and Cincinnati, specifies that neither city may be split into more than one congressional district.
- Section 2, (B)(5) of Article XIX requires 65 counties be wholly contained in a congressional district and permits eighteen counties to be split once (meaning a portion of the county boundary is included in two districts) and five counties may be split twice (meaning a portion of the county boundary is included in three districts).
- Districts shall be compact and contiguous.
- If a district contains territory within a split county, any territory within that county must be contiguous.
- No two districts can share territory of more than one county, except for counties with population over 400,000. This rule does not apply to the following counties -- Franklin, Cuyahoga, Hamilton, Summit, Montgomery and Lucas.
- The authority drawing districts shall attempt to include at least one whole county in each congressional district, except for district wholly contained within one county or than cannot be drawn in that manner while complying with federal law.
- If passed with a simple majority vote, the plan shall not unduly favor or disfavor a political party or its incumbents.
- The plan shall not unduly split governmental units, giving preference to counties and then townships and municipal corporations.



### County and Political Subdivision Splits

- Three counties -- Franklin, Cuyahoga and Hamilton -- all of which have a population greater than one ratio of representation -- must be split due to population requirements.
- Sub. Senate Bill 258 includes 76 whole counties and 12 split counties, with two counties split between three districts (Cuyahoga and Hamilton).
- The map approved in 2011 split 23 counties total, with 2 counties split between four districts and 5 counties split between three districts.
- Each congressional district that is not wholly contained in a single county, includes at least one whole county within the district boundary.
- Sub. Senate Bill 258 splits less counties than the House Democrat proposal, Senate Democrat proposal and the Fair Districts Ohio contest winner map.
- Sub. Senate Bill 258 splits 14 subdivisions -- the House Democrat plan split 21 subdivisions.
- Three of Ohio's 100 most populous cities are split (Columbus, Cuyahoga Falls and Rocky River)
- Sub. Senate Bill 258 splits the below counties and subdivisions
  - Clark County: Mad River Township
  - Cuyahoga County: Rocky River and Oakwood
  - Fairfield County: Columbus (counts as a split because the city boundary within the county is split between two districts)
  - Franklin County: Columbus
  - Hamilton County: Glendale and Sycamore Township
  - Holmes County: Berlin Township
  - Lorain County: Columbia Township
  - Ross County: Union Township
  - Shelby County: Green Township
  - Summit County: Cuyahoga Falls
  - Washington County: Belpre Township
  - Wood County: Perrysburg Township

### Urban Cities

- A significant portion of Columbus is within Congressional District 3, with a small portion within Congressional District 15. Columbus is larger than one ratio of representation and must be split into at least two districts.
- Cleveland is wholly contained within Congressional District 11.
- Cincinnati is wholly contained within Congressional District 1.
- Akron is wholly contained within Congressional District 13.
- Dayton is wholly contained within Congressional District 10.
- Toledo is wholly contained within Congressional district 9.

## 10-year Election Results, Partisan Makeup and Incumbents

### 10 year Election Results

- The below statistics were developed using statewide federal election results and geography over the last ten years.
  - Presidential races in 2012 (**Obama vs Romney**), 2016 (**Trump vs Clinton**) and 2020 (**Trump vs Biden**)
  - US Senate Races in 2012 (**Brown vs Mandel**), 2016 (**Portman vs Strickland**) and 2018 (**Brown vs Renacci**)
- Include districts specific political measurements here?????

### Partisan Makeup

- Sub. Senate Bill 258 could create six republican leaning districts, seven competitive districts and two democrat leaning districts.
- Congressional districts are considered competitive if the district could have favored or disfavored one political party by 3.75% or less.
- Congressional Districts 2, 4, 5, 7, 8 and 12 could lean republican by 53.75% or more.
- Congressional Districts 1, 6, 9, 10, 13, 14, and 15 could lean +/- 3.75%.
- Congressional Districts 3 and 11 could lean democrat by 53.75% or more.
- Sub. Senate Bill 258 would create more competitive districts than any proposal introduced in the General Assembly.
  - Eight of fifteen congressional districts in the House Democrat proposed map could favor one political party by over 60 percent.

### Incumbents

- Cincinnati must be whole and two incumbents live within city limits. Each proposed congressional plan introduced pairs those two incumbents.
- Otherwise, sub. Senate Bill 258 would not pair any returning democrat or republican incumbent into a single district.

CD #	Population	Deviation	FED 12 to 20
1	786,630	0	51.5
2	786,630	0	65.1
3	786,630	0	30.4
4	786,630	0	66.0
5	786,630	0	58.8
6	786,629	-1	52.9
7	786,630	0	56.7
8	786,630	0	62.0
9	786,630	0	47.7
10	786,630	0	52.2
11	786,630	0	19.4
12	786,629	-1	61.3
13	786,630	0	48.6
14	786,630	0	53.2
15	786,630	0	53.7

**7 Competitive Districts**  
**+/- 4%**

*Note: Uses Federal election data from Presidential and U.S. Senate races between 2012 and 2020*

*Note: Prior election results do not guarantee future election outcomes*

Springhetti000020



**7 Competitive CDs** +/- 3.75% to 3.80%

CD 7 Gibbs	56.7	CD 9 Kaptur	47.7	CD 11 Brown	19.4
CD 5 Latta	58.8	CD 13 Gonz/open	48.6	CD 3 Beatty	30.4
CD 12 Balder	61.3	CD 1 Chabot	51.5		
CD 8 Davids	62.0	CD 10 Turner	52.2		
CD 2 Wenst	65.1	CD 6 Johnson	52.9		
CD 4 Jordan	66.0	CD 14 Joyce	53.2		
		CD 15 Carey	53.8		

			ALL	PRES R/D	PRES	FED
			<u>16 to 20</u>	<u>20 only</u>	<u>R/D/I</u>	<u>12 to 20</u>
1	786,630		51.5	48.37	49.1	51.5
2	786,630		66.7	67.26	68.2	65.1
3	786,630		29.7	26.41	26.8	30.4
4	786,630		67.3	65.99	67.0	66.0
5	786,630		60.8	61.85	62.8	58.8
6	786,629	-1	56.3	61.01	61.8	52.9
7	786,630		57.9	58.44	59.3	56.7
8	786,630		62.5	60.67	61.6	62.0
9	786,630		50.3	51.38	52.3	47.7
10	786,630		53.3	50.91	51.8	52.2
11	786,630		19.8	20.30	20.5	19.4
12	786,629	-1	63.1	65.32	66.3	61.3
13	786,630		49.2	49.03	49.6	48.6
14	786,630		54.1	55.01	55.7	53.2
15	786,630		53.9	52.11	52.9	53.8

**Competitive CDs (+/- 4%) using FED data**

7	McColley (SB 258)
5	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
5	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
2	Current Map

**Competitive CDs (+/- 4%) using all data**

5	McColley (SB 258)
5	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
2	Current Map

**Competitive CDs (+/- 3.75%) using FED data**

7	McColley (SB 258)
5	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
5	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 3.75%) using all data**

4	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
5	House Dem (HB 483)
2	Current Map

**Competitive CDs (+/- 3.5%) using FED data**

6	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
4	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 3.5%) using all data**

4	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
4	House Dem (HB 483)
1	Current Map

**Competitive CDs (+/- 3%) using FED data**

5	McColley (SB 258)
4	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
4	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
4	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 3%) using all data**

3	McColley (SB 258)
3	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
3	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
2	House Dem (HB 483)
1	Current Map

**Competitive CDs (+/- 2.5%) using FED data**

4	McColley (SB 258)
3	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
3	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
3	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 2.5%) using all data**

3	McColley (SB 258)
2	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
2	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
1	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 2%) using FED data**

2	McColley (SB 258)
3	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
3	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
2	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 2%) using all data**

3	McColley (SB 258)
2	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
2	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
0	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 1.5%) using FED data**

2	McColley (SB 258)
2	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
2	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
1	House Dem (HB 483)
0	Current Map

**Competitive CDs (+/- 1.5%) using all data**

2	McColley (SB 258)
1	Yuko Sykes (SB 237) Sept 29 <sup>th</sup>
1	Yuko Sykes (SB 237) Nov 10 <sup>th</sup>
0	House Dem (HB 483)
0	Current Map





## 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 this appendix to be served by email upon the counsel listed below:

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