

# **EXHIBIT 44**



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# Transcript of Kathleen O'Connor

**Date:** February 15, 2017

**Case:** Benisek, et al. -v- Lamone, et al.

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<p style="text-align: center;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3 -----X</p> <p>4 O. JOHN BENISEK, et al., )</p> <p>5 Plaintiffs, )</p> <p>6 V ) Case No.</p> <p>7 LINDA H. LAMONE, et al., ) 13-cv-3233</p> <p>8 Defendants, )</p> <p>9 -----X</p> <p>10</p> <p>11 Deposition of KATHLEEN O'CONNOR</p> <p>12 Baltimore, Maryland</p> <p>13 Wednesday, February 15, 2107</p> <p>14 12:56 p.m.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 135038</p> <p>21 Pages 1 - 31</p> <p>22 Reported by: Dianna C. Kilgalen</p>	<p style="text-align: center;">3</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF THE PLAINTIFFS:</p> <p>3 MICAH D. STEIN, ESQUIRE</p> <p>4 KARIANNE M. JONES, ESQUIRE</p> <p>5 MAYER BROWN, LLP</p> <p>6 1999 K Street, Northwest</p> <p>7 Washington, DC 20006</p> <p>8 202.263.3000</p> <p>9 ON BEHALF OF THE DEFENDANTS:</p> <p>10 JENNIFER L. KATZ, ESQUIRE</p> <p>11 OFFICE OF THE ATTORNEY GENERAL</p> <p>12 200 St. Paul Place</p> <p>13 20th Floor</p> <p>14 Baltimore, Maryland</p> <p>15 410.576.6324</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: center;">2</p> <p>1 Deposition of KATHLEEN O'CONNOR, held at</p> <p>2 the offices of:</p> <p>3 OFFICE OF THE ATTORNEY GENERAL</p> <p>4 200 St. Paul Place</p> <p>5 20th Floor</p> <p>6 Baltimore, Maryland</p> <p>7 410.576.6324</p> <p>8</p> <p>9</p> <p>10 Pursuant to Notice, before Dianna C.</p> <p>11 Kilgalen, Notary Public for the State of Maryland.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: center;">4</p> <p>1 C O N T E N T S</p> <p>2 EXAMINATION OF KATHLEEN O'CONNOR PAGE</p> <p>3 By MS. KATZ: 5</p> <p>4</p> <p>5 E X H I B I T S</p> <p>6 (Attached to the transcript.)</p> <p>7 O'CONNOR DEPOSITION EXHIBIT PAGE</p> <p>8 52 Notice of Deposition 6</p> <p>9 53 October 21, 2013 e-mail 21</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

Conducted on February 15, 2017

5	<p>1 PROCEEDINGS</p> <p>2 KATHLEEN O'CONNOR, having been duly</p> <p>3 sworn, testified as follows:</p> <p>4 EXAMINATION BY COUNSEL FOR THE DEFENDANTS:</p> <p>5 MS. KATZ: Hi.</p> <p>6 THE WITNESS: Hello.</p> <p>7 MS. KATZ: I'm Jennifer Katz. I'm an</p> <p>8 Assistant Attorney General in the Attorney</p> <p>9 General's Office. I represent the Defendants in</p> <p>10 this matter. I'm going to ask counsel who is here</p> <p>11 to identify themselves.</p> <p>12 MR. STEIN: Micah Stein, Mayer Brown, one</p> <p>13 of the Plaintiffs' lawyers.</p> <p>14 MS. JONES: Karianne Jones, Mayer Brown.</p> <p>15 BY MS. KATZ:</p> <p>16 Q. Would you please state your name for the</p> <p>17 record?</p> <p>18 <b>A. Kathleen O'Connor.</b></p> <p>19 MS. KATZ: And I'm going to show you</p> <p>20 something. We are sequentially numbering</p> <p>21 documents. So this is going to be document 52 --</p> <p>22 Exhibit 52.</p>	7	<p>1 Q. -- for the record. Great. If you do not</p> <p>2 understand a question I ask, please let me know and</p> <p>3 I will try to rephrase it so that you do understand</p> <p>4 it.</p> <p>5 If you don't ask me to rephrase a</p> <p>6 question, I will assume that you understood it.</p> <p>7 <b>A. Okay.</b></p> <p>8 Q. And we are not going to be here for very</p> <p>9 long, I would certainly hope. But if you need a</p> <p>10 break at any time, please let me know, and we will</p> <p>11 find a good stopping point to take a break.</p> <p>12 <b>A. Okay. Thank you.</b></p> <p>13 Q. Sure. Just for -- are you -- before we</p> <p>14 get started, I was going to ask are you taking any</p> <p>15 medication today that may affect your ability to</p> <p>16 testify or recall events?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Thank you. Where do you currently live?</p> <p>19 <b>A. My current address is 9321 Watkins Road,</b></p> <p>20 <b>Gaithersburg, Maryland. The zip is 20882.</b></p> <p>21 Q. And how long have you lived there?</p> <p>22 <b>A. Since August of 2003.</b></p>
6	<p>1 (Whereupon, O'Connor Deposition Exhibit</p> <p>2 52 was marked for identification and attached to</p> <p>3 the transcript.)</p> <p>4 Q. Do you recognize this document?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. What is it?</p> <p>7 <b>A. It's a Notice of Deposition.</b></p> <p>8 Q. Okay. This is the Notice of Deposition</p> <p>9 that you were served with in this case?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Have you ever been deposed before?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Okay. So I am just going to over a few</p> <p>14 housekeeping rules. Because the court reporter is</p> <p>15 trying to take down everything we say, I won't talk</p> <p>16 over you. I will wait until you finish answering a</p> <p>17 question to ask a new one.</p> <p>18 I just ask that you wait until I finish</p> <p>19 answering a question -- asking a question to begin</p> <p>20 your answer. Also, please provide verbal responses</p> <p>21 --</p> <p>22 <b>A. Yes.</b></p>	8	<p>1 Q. Okay. Prior to that, prior to August of</p> <p>2 2003, where did you live?</p> <p>3 <b>A. I lived in Germantown, 11411 Seneca Forest</b></p> <p>4 <b>Circle in Germantown, Maryland.</b></p> <p>5 Q. And how long did you live there?</p> <p>6 <b>A. Five years.</b></p> <p>7 Q. Okay. So like 1998 to 2003?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Do you happen to know, is that in the 6th</p> <p>10 congressional district?</p> <p>11 <b>A. Germantown, I believe so.</b></p> <p>12 Q. And where did you live prior to that</p> <p>13 address in Germantown?</p> <p>14 <b>A. I lived in Damascus prior to that.</b></p> <p>15 Q. For how long?</p> <p>16 <b>A. Probably about two years.</b></p> <p>17 Q. So about 1996 to 1998?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. And was that also in the 6th congressional</p> <p>20 district?</p> <p>21 <b>A. I do not know. I was probably not even</b></p> <p>22 <b>registered to vote at that time. So I don't know.</b></p>

9

1 Q. Do you recall when you first registered to  
 2 vote?

3 A. I was trying -- I thought it was 1994, but  
 4 I don't recall exactly.

5 Q. Okay. But around 1994 you think?

6 A. I think so. I'm just not sure what my  
 7 congressional district was when I was living in  
 8 Damascus. Therefore, it makes me wonder if I was  
 9 actually registered to vote at the time. I  
 10 apologize.

11 Q. No. Please don't apologize. Do you  
 12 recall if you voted in the 1996 presidential  
 13 election?

14 A. I do not recall.

15 Q. Okay. So is it possible --

16 A. Which election was that?

17 Q. So in 199 -- this is going to be history.  
 18 Clinton, Dole. Clinton was running for  
 19 re-election.

20 A. I do not believe I voted in that election.

21 Q. Is it possible you were not registered at  
 22 that time?

10

1 A. It's possible.

2 Q. You may have registered after 1996?

3 A. Shortly thereafter. Yes, it's possible.

4 Q. Do you remember the first election in  
 5 which you voted?

6 A. I'm sorry. No, I just don't.

7 Q. No problem. What is the highest level of  
 8 schooling that you attained?

9 A. Just paralegal school after high school.

10 Q. Where did you attend high school?

11 A. Paint Branch.

12 MS. KATZ: I grew up in Montgomery County.  
 13 I went to Kennedy.

14 THE WITNESS: Oh, yeah.

15 Q. Not far. And where did you attend  
 16 paralegal school?

17 A. It was Katharine Gibbs School in Rockville  
 18 at the time.

19 Q. What kind of work do you do now?

20 A. Now I am a firearms manufacturer and  
 21 dealer.

22 Q. What sort of firearms do you manufacture?

11

1 A. Well, I have a manufacturing license. So  
 2 we manufacture -- it's -- actually, we are not  
 3 manufacturing. We are an assembler, technically.  
 4 We don't make any components. We just assemble.  
 5 But mostly AR-15s.

6 Q. And how long have you been doing that?

7 A. Almost three years.

8 Q. What did you do before that?

9 A. I was a stay-at-home mom and professional  
 10 volunteer for my children.

11 Q. Did you ever work as a paralegal?

12 A. Yes, I did.

13 Q. Do you recall when that might have been?

14 A. That would have been -- it was five years  
 15 at Shulman Rogers in Montgomery County. Let me  
 16 think when my daughter was born. I'm sorry. I  
 17 didn't think about this ahead of time. She was  
 18 born in '99. Probably '93 to '98.

19 Q. Is that the sign you see when you drive  
 20 over the bridge Shulman Rogers?

21 A. I was not there at that building. Yeah.  
 22 We were down in Rockville.

12

1 Q. Other than the firearms manufacturing and  
 2 dealing and working as a paralegal, have you had  
 3 any other professional jobs?

4 A. Prior to that, I was a legal secretary  
 5 while I was going to school. Oh, and I worked at  
 6 Fullman Daney in Bethesda prior to going to Shulman  
 7 Rogers as a -- pretty much a legal secretary.

8 Q. Got you. Do you recall if, when you were  
 9 living in Damascus from 1996 to 1998, if you voted  
 10 in any elections during that time period?

11 A. I just -- I don't recall, because I don't  
 12 know where my precinct would have been. I'm trying  
 13 to recall where I would have gone to vote, and I  
 14 just don't recall.

15 Q. Okay. What about at the -- in the  
 16 Germantown address at Seneca Forest Circle, I  
 17 believe you said?

18 A. Yes. Yes.

19 Q. So you moved there in 1998. Do you recall  
 20 voting when you lived at that address?

21 A. Yes, I do.

22 Q. Okay. Did you vote in both primary and

<p style="text-align: right;">13</p> <p>1 general elections --</p> <p>2 <b>A. I would have, yes.</b></p> <p>3 Q. -- during that time? Do you think that</p> <p>4 while you were living at that address, you ever</p> <p>5 missed an opportunity to vote?</p> <p>6 <b>A. I don't believe so.</b></p> <p>7 Q. And do you recall during that time period</p> <p>8 from 1998 to 2003 who your congressional</p> <p>9 representative was?</p> <p>10 <b>A. It was Roscoe Bartlett.</b></p> <p>11 Q. Then from 2003, you said, to -- I think is</p> <p>12 when you said you moved to the address where you</p> <p>13 live now in Gaithersburg?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Have you voted in every election in which</p> <p>16 you have been able during that time?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And does that include primary elections as</p> <p>19 well?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Okay. And do you know who your</p> <p>22 congressional representative was or is or has been</p>	<p style="text-align: right;">15</p> <p>1 registered your party membership?</p> <p>2 <b>A. When I registered to vote. It would have</b></p> <p>3 <b>been the same time.</b></p> <p>4 Q. And have you always registered as a</p> <p>5 Republican?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Have you ever voted for a candidate who</p> <p>8 was not a Republican?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. When was that?</p> <p>11 <b>A. I don't know the year, but I voted for a</b></p> <p>12 <b>candidate who was running for Register of Wills in</b></p> <p>13 <b>Montgomery County who was not a Republican.</b></p> <p>14 Q. Do you know what party that person was?</p> <p>15 <b>A. Democrat.</b></p> <p>16 Q. Do you happen to recall around what year</p> <p>17 that might have been?</p> <p>18 <b>A. It would have been while I was working at</b></p> <p>19 <b>Shulman Rogers between, I guess, '93 and '98.</b></p> <p>20 Q. Okay. Is that the only non-Republican you</p> <p>21 recall voting for?</p> <p>22 <b>A. That I recall, yes.</b></p>
<p style="text-align: right;">14</p> <p>1 from 2003 to the present?</p> <p>2 <b>A. Yes. It was Roscoe Bartlett and then went</b></p> <p>3 <b>to John Delaney.</b></p> <p>4 Q. When you voted in the elections from 1998</p> <p>5 to the present, do you always vote for your</p> <p>6 congressional representative?</p> <p>7 <b>A. As far as my party affiliation?</b></p> <p>8 Q. No. I'm sorry. Do you -- sometimes</p> <p>9 people go in, they vote for president, they vote</p> <p>10 for governor, but then they don't mark off other</p> <p>11 candidates on the ballot.</p> <p>12 Do you recall if you always marked one of</p> <p>13 the candidates running for congressional</p> <p>14 representative when you voted?</p> <p>15 <b>A. Yes. I always voted for a congressional</b></p> <p>16 <b>candidate, yes.</b></p> <p>17 Q. Thank you. Are you registered as a member</p> <p>18 of a political party?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Which party?</p> <p>21 <b>A. Republican.</b></p> <p>22 Q. And do you recall when you first</p>	<p style="text-align: right;">16</p> <p>1 Q. Did you ever vote for someone other than</p> <p>2 Roscoe Bartlett when he was on the ballot?</p> <p>3 <b>A. I don't believe so.</b></p> <p>4 Q. So you believe you voted for him in all</p> <p>5 the primaries?</p> <p>6 <b>A. I believe I always voted for him when he</b></p> <p>7 <b>was on the ballot.</b></p> <p>8 Q. Okay. What are the qualities that you</p> <p>9 look for in a political candidate?</p> <p>10 <b>A. Honesty, integrity, someone who is going</b></p> <p>11 <b>to listen to the voters and consider the people in</b></p> <p>12 <b>their district and their concerns.</b></p> <p>13 Q. If a candidate emulated those qualities,</p> <p>14 would it matter to you what party they were</p> <p>15 affiliated with?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Are you a member of any political</p> <p>18 organizations?</p> <p>19 <b>A. I am an elected member of the Republican</b></p> <p>20 <b>Central Committee, if that counts.</b></p> <p>21 Q. You said you are an elected member. Is</p> <p>22 that the Montgomery County Republican --</p>

17

1 **A. -- Central Committee, yes.**  
 2 Q. What is your title or status?  
 3 **A. I'm just a member right now. I was former**  
 4 **communications chair. But I stepped down from that**  
 5 **position probably six months ago.**  
 6 Q. And how long were you the communications  
 7 chair?  
 8 **A. From October of 2013 until probably summer**  
 9 **of 2016.**  
 10 Q. Okay. And do you recall when you -- I  
 11 don't know what the right word is -- but like  
 12 joined that committee?  
 13 **A. Yes. It was October of 2013.**  
 14 MS. KATZ: Okay.  
 15 **A. I was appointed for a vacancy. And then I**  
 16 **ran for election and was elected in 2014.**  
 17 Q. Got it. And what do you do for the  
 18 committee now as an elected member?  
 19 **A. Not very much right now, to be honest.**  
 20 **I'm not very active and involved right now.**  
 21 Q. And what did you -- what were your major  
 22 responsibilities as the communications chair?

18

1 **A. I handled media requests. Anyone who**  
 2 **wanted to speak to the chairman or ask for opinions**  
 3 **on something that was happening politically, they**  
 4 **wanted to -- I handled social media.**  
 5 Q. Okay. And why did you -- I know you said  
 6 that you were appointed in October of 2013.  
 7 **A. Uh-huh.**  
 8 Q. Why did you decide to become involved with  
 9 that organization?  
 10 **A. Well, there was an opening in my district.**  
 11 **And I felt like that would be a good place to be**  
 12 **involved and active, because I had spent so many**  
 13 **years not involved and not active.**  
 14 Q. So would you say that before October of  
 15 2013, you were not active in any political  
 16 organizations?  
 17 **A. Before 2010, I was not involved at all.**  
 18 **And then I just slowly started becoming involved**  
 19 **after 2010.**  
 20 Q. What changed in 2010 that got you slowly  
 21 getting involved?  
 22 **A. I felt like the direction of our state was**

19

1 **going in a direction that was concerning me. And I**  
 2 **wanted to be more informed and involved in perhaps**  
 3 **the direction. I'm a lifelong Maryland resident.**  
 4 **So, you know, I care about my community.**  
 5 Q. Was there something specific about the  
 6 direction Maryland was moving that concerned you?  
 7 **A. Away from my personal values, I felt.**  
 8 Q. What are those?  
 9 **A. Just conservative -- typical conservative**  
 10 **values.**  
 11 Q. What are those? What do you consider to  
 12 be typical conservative values that you share?  
 13 **A. Well, I -- I -- I think smaller, more**  
 14 **accountable government, fiscal responsibility. I'm**  
 15 **concerned about our debt. You know, there is a lot**  
 16 **of social issues in Maryland that are -- do not**  
 17 **align with my values that, you know, just concern**  
 18 **me.**  
 19 Q. Were you involved in Dan Bongino's  
 20 congressional campaign in 2014?  
 21 **A. Yes.**  
 22 Q. How were you involved?

20

1 **A. I'm trying to think of -- I had a title.**  
 2 **I can't think. It's probably like an honorary**  
 3 **title. What was my title in his campaign? I**  
 4 **honestly can't remember.**  
 5 **I basically helped get events, fundraising**  
 6 **events, get people to events. I handled social**  
 7 **media. I did a lot of photography and parades and**  
 8 **door-knocking. I wasn't the Montgomery County**  
 9 **coordinator so much, but I did a lot of those**  
 10 **activities, just normal campaign canvassing,**  
 11 **community events and things like that.**  
 12 Q. Were you -- were you a paid staffer?  
 13 **A. No.**  
 14 Q. So this was all volunteer?  
 15 **A. Yes.**  
 16 Q. Okay. Had you volunteered on any campaign  
 17 before Dan Bongino's?  
 18 **A. Not before his. I did volunteer on his**  
 19 **Senate campaign. Prior to that, I had no political**  
 20 **experience at all.**  
 21 Q. Okay. Why did you get involved with the  
 22 Bongino campaign?

21

1 **A. I met Dan at a conference and he had just**  
 2 **become a candidate. I just really connected with**  
 3 **him. I liked his message. I liked his energy and**  
 4 **his concerns.**  
 5 **And it wasn't until a few months later**  
 6 **that I joined his campaign. The first time I saw**  
 7 **him speak, I really -- I really liked his candidate**  
 8 **platform.**  
 9 Q. I'm sorry. I wasn't specific. Was this  
 10 his 2012 Senate --  
 11 **A. This was the Senate the first time I met**  
 12 **him, yes. I liked him as a candidate, as a person.**  
 13 Q. And is that why you decided to volunteer  
 14 again in 2014?  
 15 **A. Yes. I felt like that campaign was worth**  
 16 **time and effort.**  
 17 MS. KATZ: I'm going to mark this. Would  
 18 you take a look at this?  
 19 (Whereupon, O'Connor Deposition Exhibit  
 20 53 was marked for identification and attached to  
 21 the transcript.)  
 22 **A. Yes.**

22

1 Q. Do you recognize that document?  
 2 **A. Yes.**  
 3 Q. What is it?  
 4 **A. That is one of my e-mails.**  
 5 Q. Do you recall in what capacity you sent  
 6 this e-mail?  
 7 **A. What is the date? 2013. It's -- I don't**  
 8 **know if I had officially joined the campaign at**  
 9 **this time. But I was part of a women's group. So**  
 10 **I could have been out canvassing, you know, as part**  
 11 **of that group. I'm not sure.**  
 12 Q. Who is the recipient up there of the  
 13 e-mail?  
 14 **A. It looks like Brad Botman.**  
 15 Q. Who is that?  
 16 **A. I don't know if he was on the central**  
 17 **committee. He was like the support person. I'm**  
 18 **not sure if he officially was on the committee.**  
 19 Q. In the first sentence -- I'm sorry.  
 20 **A. I'm sorry. I think it's just a friendly**  
 21 **exchange. But --**  
 22 Q. In the first sentence of the e-mail, you

23

1 reference Dan.  
 2 **A. Yes.**  
 3 Q. Is that Dan Bongino?  
 4 **A. Yes.**  
 5 Q. Okay. In the e-mail, you reference that  
 6 you talked to about 25 people while canvassing, and  
 7 that only two had any idea who their congressman  
 8 was.  
 9 Do you recall those conversations?  
 10 **A. I mean, I did a lot of canvassing over the**  
 11 **years. And conversations like that where just**  
 12 **people who had zero political involvement, I don't**  
 13 **know if they ever voted, they just -- not only did**  
 14 **they not know who their congressman was at that**  
 15 **time, they never knew. That was my take-away from**  
 16 **that.**  
 17 Q. Okay. Thank you. Other than as part of  
 18 your work as a volunteer on Dan Bongino's campaign,  
 19 have you ever attended an event held by your  
 20 congressional representatives?  
 21 **A. No, I have not.**  
 22 Q. Do you recall ever contacting your

24

1 congressional representatives' constituent  
 2 services?  
 3 **A. I have not.**  
 4 Q. Have you ever contacted your congressional  
 5 representative about a particular issue?  
 6 **A. I probably would send representative**  
 7 **Bartlett thank-you messages after a big vote. I**  
 8 **just don't recall. I don't think I have ever**  
 9 **contacted John Delaney's office about anything.**  
 10 Q. Why haven't you contacted him?  
 11 **A. John Delaney's office? I just feel like**  
 12 **it's not worth the time and effort. His mind is**  
 13 **made up on every issue, and my time would be wasted**  
 14 **by contacting him.**  
 15 Q. What leads you to believe that his mind is  
 16 made up on every issue?  
 17 **A. I feel like he is going to vote --**  
 18 **whatever the Democrats are going to put forward, he**  
 19 **is going to vote with them on that issue. There is**  
 20 **no leeway. I can't imagine -- I don't really know**  
 21 **that he ever did not do that, in fact.**  
 22 Q. Do you recall when you first became



25

1 interested in the subject of redistricting?  
 2 **A. I do not.**  
 3 Q. Do you recall when you first learned about  
 4 the 2011 redistricting plan? I'm talking about the  
 5 2011 congressional redistricting plan.  
 6 **A. Obviously, I knew about it. I was not**  
 7 **involved or -- I had no -- you know, I was involved**  
 8 **in other things. I did not have any -- I didn't**  
 9 **put any effort into supporting or really not**  
 10 **supporting it.**  
 11 **I really had no knowledge of what was**  
 12 **going to happen or what the plan was.**  
 13 Q. Did you take any action regarding the 2011  
 14 congressional redistricting plan?  
 15 **A. I don't believe so, no.**  
 16 Q. You didn't testify before the governor's  
 17 redistricting advisory committee?  
 18 **A. No.**  
 19 Q. Did you post any public comments as to the  
 20 plan revealed to the public?  
 21 **A. I don't believe so. I wasn't on social**  
 22 **media or anything. I don't think I did, no.**

26

1 Q. Are you aware that the congressional  
 2 redistricting plan was petitioned to referendum?  
 3 **A. Yes.**  
 4 Q. Do you recall if you helped gather  
 5 signatures for that petition drive?  
 6 **A. I did not help gather signatures. I may**  
 7 **have signed it. I probably most likely did sign**  
 8 **it. I don't recall. I'm sure if there was one, I**  
 9 **did sign it.**  
 10 Q. Do you recall voting on the referendum?  
 11 **A. Yes.**  
 12 Q. Do you recall how you voted?  
 13 **A. I'm sure I voted against -- you know, I**  
 14 **wanted to stop the redistricting. So however it**  
 15 **was worded.**  
 16 Q. Got it. Aside from joining this lawsuit,  
 17 have you taken any other action about redistricting  
 18 after the 2011 cycle?  
 19 **A. No.**  
 20 Q. How did you first hear about this lawsuit?  
 21 **A. I believe information about it was sent to**  
 22 **our central committee. And some of us did live in**

27

1 **the district and probably met the criteria.**  
 2 Q. Do you know who sent the information to  
 3 the central committee?  
 4 **A. I do not. I'm sorry. I would guess it**  
 5 **was another member on the committee was circulating**  
 6 **it to our group.**  
 7 Q. Why did you decide to join the lawsuit?  
 8 **A. Because I think it's important. I live in**  
 9 **Montgomery County. I have no Republican**  
 10 **representative at the state or local county level,**  
 11 **anywhere.**  
 12 **After this redistricting, I was left**  
 13 **with -- my one, you know, sort of piece of comfort**  
 14 **in the political realm was taken away, I think**  
 15 **intentionally.**  
 16 Q. Do you think you were harmed by the 2011  
 17 congressional redistricting plan?  
 18 **A. It ensured that I will no longer have**  
 19 **representation. And I do not believe it's even a**  
 20 **competitive district at this point.**  
 21 Q. When you say it ensured that you will no  
 22 longer have representation, what does that mean?

28

1 **A. I had a representative that shared my**  
 2 **values and my views before the redistricting. And**  
 3 **after, I don't see any way for any Republican**  
 4 **candidate to win that district again because of the**  
 5 **influx and the change in the voter make-up of that**  
 6 **district.**  
 7 MS. KATZ: I'm going to take a short  
 8 break.  
 9 (Thereupon, there was a recess taken at  
 10 1:24 p.m.)  
 11 (Thereupon, the proceedings were resumed  
 12 at 1:30 p.m.)  
 13 BY MS. KATZ:  
 14 Q. You had testified that you didn't think a  
 15 Republican could win in the 6th congressional  
 16 district.  
 17 **A. Uh-huh.**  
 18 Q. Did you believe that at the time you were  
 19 volunteering for Dan Bongino's campaign?  
 20 **A. I believe deep down, yes, I did believe**  
 21 **that a Republican could not win, although Dan was a**  
 22 **fantastic candidate, and he already had name**


29

1 **recognition from the Senate campaign.**  
 2 **And he had become a consultant for MSNBC,**  
 3 **I believe, CNN, Fox News. He had great national**  
 4 **exposure. And people across the country knew who**  
 5 **he was. I thought wow, if anyone can, Dan could do**  
 6 **it.**  
 7 **But I think it actually proved the point**  
 8 **that even the best Republican candidate with that**  
 9 **kind of exposure, which will probably never happen**  
 10 **again, cannot win in that district.**  
 11 Q. Do you think it hurt his campaign that he  
 12 didn't live in the 6th district?  
 13 A. **No. Because I don't think Mr. Delaney**  
 14 **lives there either.**  
 15 Q. And can you tell me why specifically you  
 16 don't think a Republican can win in that district?  
 17 A. **Because the numbers of voters for each**  
 18 **party are wildly -- you know, there is just too**  
 19 **much of a gap between the number of voters in that**  
 20 **district, the different parties.**  
 21 Q. Do you actually know the numbers of the  
 22 voters in that district?

30

1 **A. I don't. But I have seen the maps, and I**  
 2 **know Montgomery County pretty well as far as their**  
 3 **political views. And that big chunk of Montgomery**  
 4 **County that was placed in that district just**  
 5 **overwhelms the population, the density. Being out**  
 6 **in Western Maryland, there is just not the**  
 7 **population and the density to overcome that.**  
 8 MS. KATZ: All right. I think that is it.  
 9 MR. STEIN: Okay. I will take a moment.  
 10 (Thereupon, there was a recess taken at  
 11 1:32 p.m.)  
 12 (Thereupon, the proceedings were resumed  
 13 at 1:33 p.m.)  
 14 MR. STEIN: We have no questions.  
 15 THE REPORTER: Mr. Stein, did you want a  
 16 copy?  
 17 MR. STEIN: Yes, we do. Five-day  
 18 turnaround, please.  
 19 (Off the record at 1:33 p.m.)  
 20  
 21  
 22

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1 CERTIFICATE OF SHORTHAND REPORTER  
 2 NOTARY PUBLIC  
 3 I, Dianna C. Kilgalen, the officer before  
 4 whom the foregoing deposition was taken, do hereby  
 5 certify that the foregoing transcript is a true  
 6 and correct record of the testimony given; that  
 7 said testimony was taken by me stenographically and  
 8 thereafter reduced to typewriting under my  
 9 direction; that reading and signing was not  
 10 requested; and that I am neither counsel for,  
 11 related to, nor employed by any of the parties to  
 12 this case and have no interest, financial or  
 13 otherwise, in its outcome.  
 14 IN WITNESS WHEREOF, I have hereunto set my  
 15 hand and affixed my notarial seal this 21st day of  
 16 February, 2017.  
 17 My commission expires June 28th, 2017.  
 18  
 19   
 20 NOTARY PUBLIC  
 21 IN AND FOR THE STATE OF MARYLAND  
 22 COUNTY OF HARFORD

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<p><b>13</b>                  1:7  <b>135038</b>                  1:20  <b>15</b>                  1:13, 11:5  <b>199</b>                  9:17  <b>1994</b>                  9:3, 9:5  <b>1996</b>                  8:17, 9:12,                  10:2, 12:9  <b>1998</b>                  8:7, 8:17,                  12:9, 12:19,                  13:8, 14:4  <b>1999</b>                  3:6</p> <hr/> <p style="text-align: center;"><b>2</b></p>	<p><b>2017</b>                  31:16, 31:17  <b>202.263</b>                  3:8  <b>20882</b>                  7:20  <b>21</b>                  4:9, 31:15  <b>2107</b>                  1:13  <b>24</b>                  28:10  <b>25</b>                  23:6  <b>28</b>                  31:17</p> <hr/> <p style="text-align: center;"><b>3</b></p>	<p><b>9321</b>                  7:19  <b>98</b>                  11:18, 15:19  <b>99</b>                  11:18</p>	
<p><b>20</b>                  2:5, 3:13  <b>200</b>                  2:4, 3:12  <b>20006</b>                  3:7  <b>2003</b>                  7:22, 8:2, 8:7,                  13:8, 13:11,                  14:1  <b>2010</b>                  18:17, 18:19,                  18:20  <b>2011</b>                  25:4, 25:5,                  25:13, 26:18,                  27:16  <b>2012</b>                  21:10  <b>2013</b>                  4:9, 17:8,                  17:13, 18:6,                  18:15, 22:7  <b>2014</b>                  17:16, 19:20,                  21:14  <b>2016</b>                  17:9</p>	<p><b>30</b>                  28:12  <b>31</b>                  1:21  <b>32</b>                  30:11  <b>3233</b>                  1:7  <b>33</b>                  30:13, 30:19</p> <hr/> <p style="text-align: center;"><b>4</b></p> <p><b>410.576</b>                  2:7, 3:15</p> <hr/> <p style="text-align: center;"><b>5</b></p> <p><b>52</b>                  4:8, 5:21,                  5:22, 6:2  <b>53</b>                  4:9, 21:20  <b>56</b>                  1:14</p> <hr/> <p style="text-align: center;"><b>6</b></p> <p><b>6th</b>                  8:9, 8:19,                  28:15, 29:12</p> <hr/> <p style="text-align: center;"><b>9</b></p> <p><b>93</b>                  11:18, 15:19</p>		