

**IN THE SUPREME COURT OF OHIO**

<b>Regina Adams, et al.,</b>  <b>Relators,</b>  <b>v.</b>  <b>Governor Mike DeWine, et al.,</b>  <b>Respondents.</b>	<b>Case No. 2021-1428</b>  Original Action Filed Pursuant to Ohio Constitution, Article XIX, Section 3(A)
<b>League of Women Voters of Ohio, et al.,</b>  <b>Relators,</b>  <b>v.</b>  <b>Governor Mike DeWine, et al.,</b>  <b>Respondents.</b>	<b>Case No. 2021-1449</b>  Original Action Filed Pursuant to Ohio Constitution, Article XIX

**PRESENTATION OF EVIDENCE BY RESPONDENTS HUFFMAN AND CUPP**

**VOLUME II**

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## PRESENTATION OF EVIDENCE BY RESPONDENTS HUFFMAN AND CUPP

### VOLUME I

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Respondents, Speaker of the Ohio House of Representatives Robert Cupp, and Senate President Matthew Huffman submit the following evidence in this matter<sup>1</sup>:

Exhibit	Item Description	Page no.
1	Deposition of Mr. Raymond DiRossi	HC001-HC284
<b>VOLUME II</b>		
2	Exhibits to Deposition of Mr. Raymond DiRossi	HC285-HC319
3	Deposition of Mr. Blake Springhetti	HC320-HC458
4	Exhibits to Deposition of Mr. Blake Springhetti	HC459-HC502
<b>VOLUME III</b>		
5	Senate President Huffman's Objections and Responses to Relators' Document Requests	
6	Senate President Huffman's Objections and Responses Interrogatories	
7	Senate President Huffman's Objections and Responses to Relators' Requests for Admission	
8	Speaker Cupp's Objections and Responses to Relators' Document Requests	
9	Speaker Cupp's Objections and Responses to Relators' Interrogatories	
10	Speaker Cupp's Objections and Responses to Relators' Requests for Admission	
11	Mr. Raymond DiRossi's Objections and Responses to Relators' Subpoena Duces Tecum	
12	Mr. Blake Springhetti's Objections and Responses to Relators' Subpoena Duces Tecum	
13	Senator Gavarone's Objections and Responses to Relators' Subpoena Duces Tecum	
14	Senator McColley's Objections and Responses to Relators' Subpoena Duces Tecum	
15	Representative Wilkin's Objections and Responses to Relators' Subpoena Duces Tecum	
16	Representative Oeslager's Objections and Responses to Relators' Subpoena Duces Tecum	

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<sup>1</sup> Respondents Huffman and Cupp also reserve the right to rely on any evidence presented in this matter by stipulation or presented by any other party.

17	Secretary of State LaRose's Objections and Responses to Relators' Document Requests	
18	Secretary of State LaRose's Objections and Responses to Relators' Interrogatories	
19	Secretary of State LaRose's Objections and Responses to Relators' Requests for Admission	
20	Transcript of Ohio Redistricting Commission Meeting dated October 28, 2021	
21	Email from Speaker Cupp on November 15, 2021 RE: "Congressional Map compare"	
22	Testimony of Senator McColley	
23	Testimony of Senator McColley	
24	Email and Attachments from Senator McColley, November 16, 2021 RE: "SB 258 Ray notes"	
25	Email from Patti Diamond on October 2, 2021 RE: "Redistricting"	
26	Public Comment to Governor DeWine's Office by James Hitt on October 7, 2021	
27	Public Comment to Governor DeWine's Office by Lawrence Polena on October 7, 2021	
28	Email from Blake Springhetti on November 15, 2021 RE: "Substitute Senate Bill 258.Brief"	
29	Email and Attachment from Heather Blessing on November 18, 2021 RE: "Turcer Testimony"	
30	Dave's Redistricting 2020 Analysis of Ohio 2022 Congressional Districts	
31	Cincinnati Enquirer Article dated December 2, 2021 "Jason Williams: Why this Cincinnati city councilman might challenge Republican Steve Chabot in 2022 election"	
32	Axios Columbus Article dated November 19, 2021 "Ohio lawmakers pass new congressional district map"	
33	Plain Dealer Article dated November 21, 2021 "Gov. Mike DeWine approves Ohio congressional map bill that likely strengthens GOP share"	
34	The Hannah Report dated November 22, 2021 "DeWine Signs Congressional Redistricting Map"	
35	ABCNews' Project FiveThirtyEight, "What Redistricting Looks Like in Every State" updated December 9, 2021 at 7:37 PM	
<b>VOLUME IV</b>		
36	Affidavit and Expert Report of Dr. Michael Barber	
37	Affidavit of Mr. Raymond DiRossi	

Respectfully submitted this the 10th day of December, 2021

By:

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2021, I have served the foregoing document by email:

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# **Exhibit 2**



ID	ID:1	AREA	DISTRICT	MEMBERS	LOCKED	NAME	TOTPOPI	G20R	G20V	G20P_DV	G20P_RV	G20P_TV	G12P_DV	G12P_RV	G12P_TV	G12S_DV	G12S_RV	G12S_TV	G14G_DV	G14G_RV	G14G_TV	G14A_DV	G14A_RV	G14A_TV	G14I_DV	G14I_RV	G14I_TV	G14T_DV	G14T
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2	530	4663.95	4	1.0		786630	532597.200	408059.400	132452.500	269261.000	408059.700	131939.300	222037.000	360336.200	128735.400	209022.900	354969.400	47216.410	156765.000	209464.200	55951.900	135196.300	209148.200	50830.110	146400.000	207116.400	16523.390	11673.	
3	521	3953.59	9	1.0		786630	551009.500	388974.200	182464.300	199867.500	388974.700	223669.700	158801.100	389782.300	214844.900	148678.300	382040.700	79759.190	122671.400	209595.700	91134.080	118162.400	209296.500	86181.480	105282.700	203761.400	14811.870	10866.	
4	564	654.29	1	1.0		786630	558812.200	405284.900	202960.200	196045.000	405285.100	17325.800	188861.000	372442.000	177980.300	172901.700	364505.900	66079.070	127164.400	200327.500	889690.270	115254.700	202214.900	72733.380	115147.800	197688.400	11554.960	18774.	
5	563	2110.74	8	1.0		786630	531333.300	393454.900	149054.900	238697.300	393455.200	143717.300	216808.700	366239.500	141906.400	201841.800	359354.700	63138.670	141819.600	199810.000	66832.350	133518.700	200351.100	57142.920	130868.300	198227.800	48959.520	15059.	
6	565	6408.48	2	1.0		786630	539263.900	396912.200	124503.100	266964.300	396912.300	139314.800	216014.300	361824.900	139310.000	194644.800	350822.000	55709.570	145457.400	207333.000	69161.460	138960.000	208121.500	60122.250	132954.900	204178.100	17416.190	17456.	
7	491	3378.06	14	1.0		786630	539401.100	420753.700	183788.400	231445.100	420753.900	194077.700	188606.300	389148.600	187157.700	170305.500	377490.600	66798.130	147835.700	222567.500	76689.040	145932.000	222621.000	81172.040	126530.000	217562.000	5344.050	11985.	
8	566	205.14	3	1.0		786630	525659.200	365287.300	263276.000	96456.080	365287.600	231433.600	108413.900	344915.900	226859.200	100050.000	338849.200	79428.830	147301.600	92404.800	82979.050	175383.800	93135.020	75793.720	173511.400	8782.150	78852.		
9	557	4748.40	6	1.0		786629	547668.400	400172.000	150885.400	244146.500	400172.500	212283.200	173816.600	393192.600	214101.200	147386.700	381235.000	87573.820	130646.300	225753.800	103559.000	122384.900	225944.000	103697.300	106835.300	221585.200	16267.040	14068.	
10	573	2554.48	15	1.0		786630	512318.200	383689.500	177697.900	199916.100	383689.700	155967.600	170592.600	331945.200	152208.900	158076.100	325973.500	50430.990	120813.800	177008.800	58936.110	118622.600	177558.700	56494.790	110851.200	179066.300	11682.530	16289.	
11	526	5640.67	5	1.0		786630	538893.000	397748.600	145570.900	249991.800	397749.000	167558.000	193149.400	368006.000	162635.100	180974.700	361898.200	57585.800	140091.700	203685.100	66121.320	136581.900	202703.300	65744.290	122038.100	198585.900	9222.880	11083.	
12	562	995.65	10	1.0		786630	543199.800	391705.700	185644.500	199426.600	391706.000	189723.700	189983.100	385939.400	187232.300	177885.800	379457.200	70935.560	138774.500	215035.200	76730.330	138484.100	215214.400	76413.220	125482.000	211801.500	12670.210	12065.	
13	574	1096.72	13	1.0		786630	553965.400	422352.000	210060.500	207066.900	422352.400	208390.000	181180.700	394997.800	208206.300	159049.500	384702.400	68192.870	136695.600	212349.100	78334.910	133836.500	212171.400	83174.320	115427.800	207205.500	8598.310	11137.	
14	572	5690.83	12	1.0		786629	517916.000	384659.400	127432.000	251134.900	384657.900	153514.900	186699.400	347599.400	147233.600	175089.500	341711.100	57728.290	135028.100	199165.200	66466.300	132839.700	199306.000	62508.790	123734.600	196086.100	7516.480	9377.	
15	418	693.07	11	1.0		786630	551649.300	358167.500	281658.400	72712.100	358167.800	321613.300	69586.280	394585.100	301583.500	62712.970	374674.600	109446.700	72299.310	190934.700	120684.900	71460.400	192145.400	130588.200	50636.910	187773.900	15229.100	19615.	















Enacted Plan SB 258 Intro





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ID	ID:1	AREA	DISTRICT	MEMBERS	LOCKED	NAME	TOTPOP	G20R	G20V	G20P_DV	G20P_RV	G20P_TV	G12P_DV	G12P_RV	G12P_TV	G12S_DV	G12S_RV	G12S_TV	G14G_DV	G14G_RV
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2	530	4663.9536	4		1		786630	532597	408059	132452.5	269261	408059.7	131939.3	222037.1	360336.3	128735.4	209022.9	354969	47216.41	156765
3	521	3953.5911	9		1		786630	551010	388974	182464.3	199867.5	388974.7	223669.7	158801.1	389782.3	214844.9	148678.3	382041	79759.19	122671.4
4	564	654.29028	1		1		786630	558812	405285	202960.2	196045	405285.1	178325.8	188861	372442	177980.3	172901.7	364506	66079.07	127164.4
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6	565	6408.4829	2		1		786630	539264	396912	124503.1	266964.3	396912.3	139314.8	216014.3	361824.9	139310	194644.8	350822	55709.57	145457.4
7	491	3378.0571	14		1		786630	539401	420754	183788.4	231445.1	420753.9	194077.7	188606.3	389148.6	187157.7	170305.5	377491	66798.13	147835.7
8	566	205.13959	3		1		786630	525659	365287	263276	96456.08	365287.6	231433.6	108413.9	344952.9	226859.2	100050	338849	79428.83	85849.94
9	557	4748.4033	6		1		786629	547668	400172	150885.4	244146.5	400172.5	212283.2	173816.6	393192.6	214101.2	147386.7	381235	87573.82	130646.3
10	573	2554.4763	15		1		786630	512318	383690	177697.9	199916.1	383689.7	155967.6	170592.6	331945.2	152208.9	158076.1	325974	50430.99	120813.6
11	526	5640.6689	5		1		786630	538893	397749	145570.9	245990.8	397749	167558.3	193149.4	368006	162635.1	180974.7	361898	57555.84	140091.7
12	562	995.65228	10		1		786630	543200	391706	185644.5	199426.6	391706	189723.7	189983.1	385939.4	187232.3	177885.8	379457	70935.56	138774.5
13	574	1096.719	13		1		786630	553965	422352	210060.5	207066.9	422352.4	208390	181180.7	394997.8	208206.8	159049.5	384702	68192.87	136695.6
14	572	5690.8296	12		1		786629	517916	384457	127432	251134.9	384457.9	153514.4	186699.4	347597.4	147233.6	175089.5	341711	57728.29	135028.1
15	418	693.073	11		1		786630	551649	358168	281658.4	72712.1	358167.8	321613.3	69586.28	394585.1	301583.5	62712.97	374675	109446.7	72299.31

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207184	67979.38	138907	206886.4	70699.8	123099	203066	63567.43	131823.7	204613	81132.6	124990	206123	140772.5	208984.3	366926.5	118161.5	221972.8	360464	143789.8
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199810	66832.35	133518.7	200351.1	57142.9	130868	198228	54859.52	135059.1	199194	65946.5	134617	200564	128996	222782.2	367163	101410.2	245164.6	361479	125983.1
207333	69161.46	138960	208121.5	60122.3	132955	204178	57416.19	137456.5	205265	67001.3	140165	207166	108026.1	241685.9	365079.5	93350.75	253028.6	361169	115918.6
222567.5	76689.04	145932	222621	81172	126530	217562	75344.05	131985.9	218078	94490.7	127078	221569	159645.8	204175	380718.3	129873.6	219281	369874	164835.5
174301.6	92404.8	82979.05	175383.8	91315	75793.7	173511	88782.15	78852.6	174582	107095	67837.8	174933	235156.5	94300.15	345310.5	196918.2	126643.5	337747	216092.6
225753.8	103559	122384.9	225944	103697	106835	221585	86267.04	124068.7	222269	101160	123327	224487	146138.5	218276.4	379104	137938.9	212792.5	370571	153735.9
177008.8	58936.11	118622.6	177558.7	56494.8	110851	175066	51682.53	116289.7	175910	72467	104167	176634	144616.6	178349.1	339249.6	117853.4	202314.4	334552	148400.7
203682.5	66121.32	136581.9	202703.3	65744.2	122038	198586	59222.88	131083.1	200462	75890.1	126477	202367	129048.4	215981.2	364118.9	109049.6	228439.4	356692	137702.1
215035.2	76730.33	138484.1	215214.4	76413.2	125482	211802	72670.21	132065.7	214073	93193.1	120635	213828	166475.2	189174.1	373016.2	132944.1	219731.3	368766	160171.3
212349.1	78334.91	133836.5	212171.4	83174.3	115428	207206	78598.31	121137	208721	99250.5	111898	211148	182679.6	184985.2	383513.5	148045.6	205050.7	372802	179824.5
199165.2	66466.3	132839.7	199306	62508.8	123735	196086	57516.48	129377.2	196676	76825.4	120959	197784	114774.6	219001.7	350467.6	100495.9	227827.2	345649	123373.4
190934.7	120684.9	71460.4	192145.4	130588	50636.9	187774	135229.1	49615.27	191376	138558	52211.7	190769	283276.7	64674.5	358107.3	239508.1	85546.02	341801	234962.5



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	EA51_DV	EA51_RV	EA51_TV
153159	296949	126080	162038.6	297804.2	128473.9	163870.6	292344.6	122793	157548	292109	123901.6	163815.8	294524	123844	167582	291426	143773.6	206810	350584
179908	300859	99841.96	193659.5	302383.6	97269.86	201797.6	299067.4	96162.9	190781	297513	97676.91	193772.7	298495	95818.9	200159	295978	113118.6	242102.9	355222
120761.1	288096	143835.7	135907.8	290285.3	146120.1	139472.7	285592.9	135157	134586	282486	140661.7	135178.5	283962	137996	144060	282055	166805.9	172824.1	339630
144689.7	309299	147957.4	154084	310687.7	152530.9	153833.6	306364.5	140173	150619	305297	149199.7	150984.9	307641	145645	159082	304727	163550.4	194435.9	357986
164031.5	290015	108593.5	172997.2	290539.6	111022.7	173874.2	284896.9	102323	172692	287453	109979.4	171682.2	288683	108363	178436	286800	123466	218531.3	341997
173717.1	289636	98093.54	185083.2	291659.2	99059.97	188251.3	287311.3	94488.5	179687	286098	98017.87	182049.6	287140	96599.1	188426	285025	116463	227822.6	344286
145710.2	310546	141506.2	160007.9	311617.4	147549.8	159309.8	306859.6	136894	151263	301855	144608.9	154572.7	306459	138273	164181	302453	162559.9	203625.7	366186
72203.2	288296	202811.5	80430.86	289826.2	197481.1	88643.84	286124.9	197994	75411	283313	198206.2	81017	284981	195259	87547.8	282807	216715	110841.7	327557
143043.5	296779	131878.3	156789.4	297109.4	131958.5	160276.5	292235.1	130215	148457	289778	127304.4	157940.9	292183	131408	157358	288766	160707.8	187933.1	348641
132055.6	280456	132843.5	142532	282411.8	127314.8	151625.9	278940.7	128562	137228	276053	127692.1	143140.2	277167	124931	150071	275002	144627.5	188423.3	333051
149785.4	287488	113264.4	166653.3	289427.7	114694.2	167093.9	281788.1	107626	163094	282521	112698.9	163721.5	283804	109631	172510	282141	133773.9	209814.4	343588
139817.7	299989	136342	155562	301141.9	139754.1	157426.2	297180.4	132737	150069	295690	139027.3	151415.7	297609	138043	157922	295965	154180.5	192243.4	346424
136118.7	315943	160414.3	147623.3	316501.6	164015.6	145497.7	309513.3	154509	140454	307713	157736.6	146899.8	311611	154798	152692	307489	178610.4	190816.6	369427
156245.9	279619	104040.9	168039.1	280717	102245.4	173223.4	275468.9	112271	156264	277621	103002.5	167175.1	276921	102534	172216	274750	124360.6	208226.8	332588
46011.7	280974	221782.2	54091.87	282233.7	226466.4	51867.38	278333.8	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	F_EA52_RV	IDEAL_VALU	F_POPULATI	F20PRES_RD	FEDEA	FEDEA_RDI	MULTIPLE_F
145641.3	187349.1	332991	786630	0	0	7	57.88085	0.584354	0.589902	0.562626	786630	1	59.3	56.7	54.8	7 0
115539.3	222069.8	337609	786630	0	0	4	67.29174	0.659857	0.681555	0.657772	786630	1	67	66	64	4 0
165214.3	157967.4	323182	786630	0	0	9	50.31423	0.513832	0.50886	0.488788	786630	1	52.3	47.7	46.1	9 0
169849.2	172371	342220	786630	0	0	1	51.54992	0.483721	0.543138	0.503685	786630	1	49.1	51.5	50.1	1 0
126569.5	198275.3	324845	786630	0	0	8	62.4661	0.60667	0.638986	0.610369	786630	1	61.6	62	60.3	8 0
113931	212812.5	326744	786630	0	0	2	66.69989	0.672603	0.661726	0.651314	786630	1	68.2	65.1	63.3	2 0
166073.6	181922.6	347996	786630	0	0	14	54.13648	0.550072	0.556072	0.522772	786630	1	55.7	53.2	51.6	14 0
225591.8	89388.17	314980	786630	0	0	3	29.66365	0.264055	0.338389	0.28379	786630	1	26.8	30.4	29.6	3 0
150303.3	181160.6	331464	786629	-1	-0.000001	6	56.29489	0.610103	0.539045	0.546547	786630	1	61.8	52.9	51.3	6 -1
151159.2	165011.9	316171	786630	0	0	15	53.88655	0.521036	0.565749	0.521907	786630	1	52.9	53.7	52.2	15 0
132940.1	192594.8	325535	786630	0	0	5	60.78969	0.618457	0.610656	0.591626	786630	1	62.8	58.8	56.9	5 0
159145.4	172184.6	331330	786630	0	0	10	53.32092	0.509123	0.554937	0.519677	786630	1	51.8	52.2	50.8	10 0
183959.6	167825.6	351785	786630	0	0	13	49.2329	0.490271	0.51652	0.477068	786630	1	49.6	48.6	47.2	13 0
121398.3	193898.9	315297	786629	-1	-0.000001	12	63.07126	0.653218	0.626081	0.614972	786630	1	66.3	61.3	59.3	12 -1
249012.2	58532.89	307545	786630	0	0	11	19.79496	0.203011	0.231343	0.190323	786630	1	20.5	19.4	19	11 0

DISTRICT\_L

7|0%  
4|0%  
9|0%  
1|0%  
8|0%  
2|0%  
14|0%  
3|0%  
6|-0%  
15|0%  
5|0%  
10|0%  
13|0%  
12|-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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HC297



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

HC298



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	

			FED
			<u>12 to 20</u>
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

Major cities history.....

- Regarding 7 of the Big 8 cities: Akron, Canton, Cincinnati, Cleveland, Dayton, Toledo and Youngstown (Note: Columbus too big to be 1 CD)
- 1<sup>st</sup> time since at least 1965 that all are major cities (Columbus note) whole / none split

Testimony to add Greene county (Wright Patt) back to the 10<sup>th</sup> DONE

Testimony to not split Franklin 3 ways DONE

Testimony to not split Toledo / Lucas county DONE

Testimony to unify the Mahoning Valley (Trumbull and Mahoning) DONE

County specific history.....

**Lucas County**

2021 Whole                      2011 Split in 2                      2001 Split in 2

**Montgomery County**

2021              Whole  
2011              Whole  
2001              Split in 2  
1991              Split in 2  
1981              Split in 2  
1971              Split in 3  
1968              Split in 4

**Franklin County**

2021              Split in 2  
2011              Split in 3  
2001              Split in 3

**Summit County**

2021              Split in 2  
2011              Split in 4  
2001              Split in 3

**Stark County**

2021 Whole                      2011 Split in 3

**Cuyahoga County**

2021              Split in 3  
2011              Split in 4  
2001              Split in 4  
1991              Split in 4  
1981              Split in 3  
1971              Split in 4  
1968              Split in 4  
1965              Split in 4

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

exhibits.ticker.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



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	

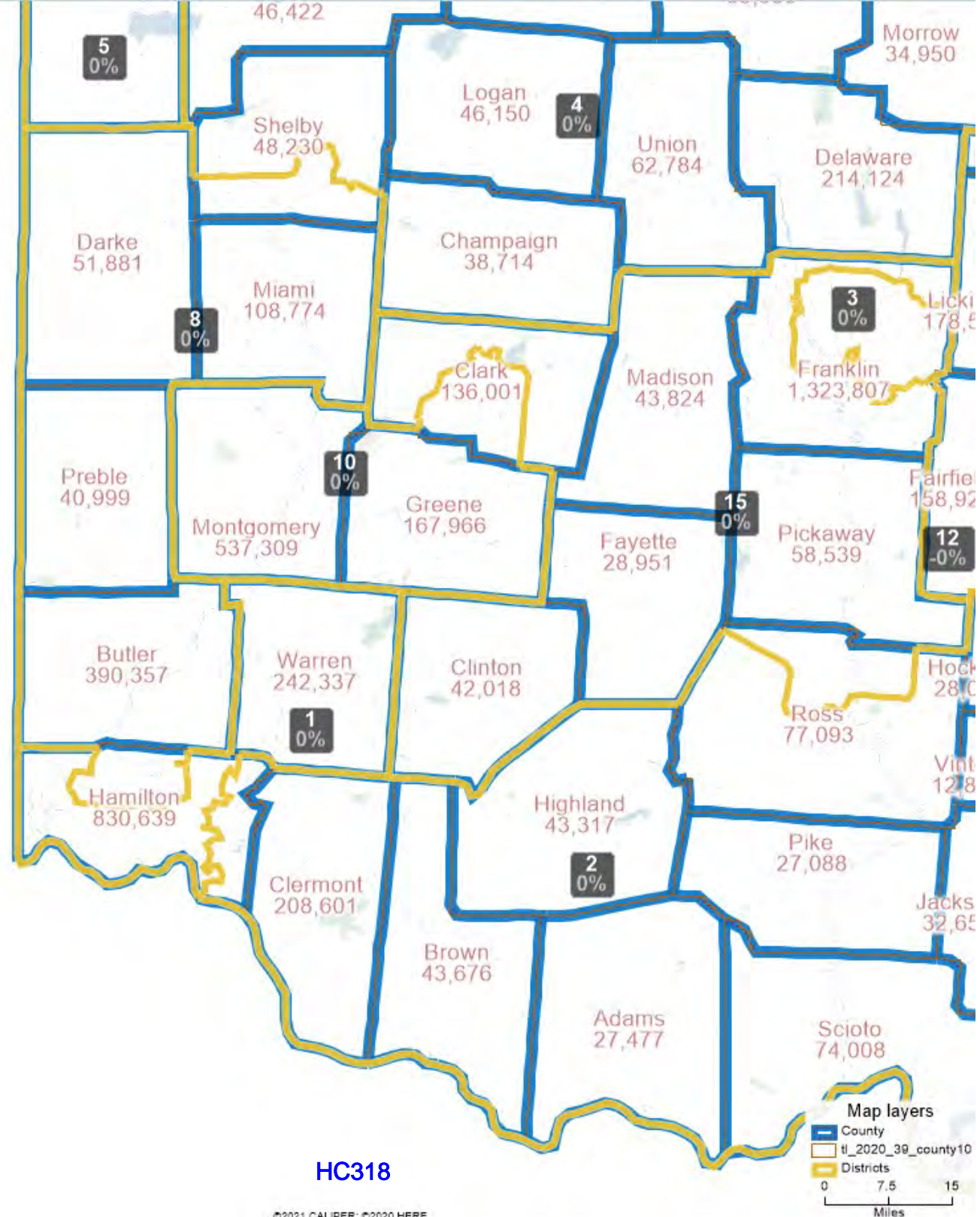


**Exhibit #**

**DiRossi 9**

12/7/21

exhibitsticker.com



HC318



# **Exhibit 3**

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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

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

ON BEHALF OF THE LEAGUE OF WOMEN VOTERS OF OHIO

RELATORS:

MS. BRADY BENDER

MR. ALEX THOMSON

MS. SARAH SUWANDA

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850 Tenth Street, NW

Washington, D.C. 20001

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bbender@cov.com

-and-

MR. DAVID DENUYL

MR. ROBERT D. FRAM

COVINGTON & BURLING, LLP

415 Mission Street, Suite 5400

San Francisco, California 94105-2533

415.591.6000

ddenuyl@cov.com

(Continued)

A P P E A R A N C E S   C O N T I N U E D

ON BEHALF OF THE ADAMS RELATORS:

MS. JYOTI JASRASARIA

MS. RAISA CRAMER

MS. HARLEEN GAMBHIR

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(Continued)

A P P E A R A N C E S   C O N T I N U E D

ON BEHALF OF RESPONDENT SECRETARY OF STATE

FRANK LaROSE:

MS. BRIDGET C. COONTZ

MR. MICHAEL WALTON

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ALSO PRESENT:

Mr. Frank Strigari, Senate Counsel

Mr. Ethan Rex, Technician

Ms. Madeline Nagy, Videographer



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Transcript of Blake Springhetti  
Conducted on December 7, 2021

7

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  
2 of Secretary of State Frank LaRose. With me is  
3 Mike Walton, and soon to be joining is Julie  
4 Pfeiffer.

14:32:37

14:32:40

14:32:42

14:32:45

5 MR. DENUYL: This is David Denuyl of  
6 Covington & Burling on behalf of the League of  
7 Women Voters as well.

14:32:48

14:32:49

14:32:51

8 MR. THOMSON: This is Alex Thomson of  
9 Covington & Burling on behalf of League of Women  
10 Voters Relators.

14:32:55

14:32:55

14:32:59

11 THE VIDEOGRAPHER: The court reporter  
12 today is Michelle Yohler, representing Planet  
13 Depos.

14:33:06

14:33:07

14:33:09

14 Will the reporter please swear in the  
15 witness.

14:33:09

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  
23 you for being here today. As I just said, my name  
24 is Brady Bender. I'm an attorney with Covington &  
25 Burling, and I'm representing the League of Women

14:33:33

14:33:38

14:33:40

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

Transcript of Blake Springhetti  
Conducted on December 7, 2021

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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

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  
2 taken place in the William Green Building, but  
3 potentially conversations or other things might  
4 have taken place outside of the William Green  
5 Building?

14:37:18

14:37:20

14:37:23

14:37:25

14:37:27

6 A Yes.

14:37:27

7 Q Okay. When you were in the William Green  
8 Building, did you and Mr. DiRossi work in the same  
9 room?

14:37:27

14:37:32

14:37:34

10 A Again, we worked in the same room in the  
11 same state office building, same state office that  
12 we used for the General Assembly process.

14:37:34

14:37:41

14:37:44

13 Q And just to clarify, I understood during  
14 the General Assembly process that both of you  
15 were -- your computers were in the same room, and  
16 that's also the case here in the William Green  
17 Building?

14:37:47

14:37:50

14:37:53

14:37:56

14:37:59

18 A Yes, the computers are in the same spot  
19 that they were during that process.

14:37:59

14:38:03

20 Q And so because you were working in the  
21 same room, you could simply talk to one another as  
22 you were drawing or as you were working?

14:38:05

14:38:08

14:38:11

23 A Could that happen, yes. But I'll just say  
24 that, again, it was very much not the same type of  
25 situation, just due to scheduling. He and I very

14:38:13

14:38:19

14:38:23

1 much were in passing. But, yes, that could  
2 happen.

3 Q And it did happen sometimes?

4 A Yes, it did happen sometimes.

5 Q Did you and Mr. DiRossi communicate in any  
6 other ways about the congressional maps, beyond  
7 talking while you were in this room?

8 A No.

9 Q Okay. So no email?

10 A There -- we exchanged bill drafts, yes.  
11 So we did exchange some emails related to drafting  
12 and block assignment files and things of that --

13 Q And would those emails have been provided  
14 to your counsel for this case?

15 A I produced them.

16 MS. BENDER: Okay. I just want to confirm  
17 that any such emails would have been produced to  
18 us and request that if they have not yet been  
19 produced to us, that they -- that they are  
20 produced imminently -- immediately after this  
21 deposition.

22 MR. McGUIRE: All right. Yeah, I'm not  
23 aware of any documents responsive to your request  
24 for Mr. Springhetti that have not been produced.

25 MS. BENDER: Okay.



Transcript of Blake Springhetti  
Conducted on December 7, 2021

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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	14:41:06
2	process?	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  
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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  
2 Maptitude.

3 Q Okay. Did you use any data about voting  
4 history in drawing these maps?

5 A Yes.

6 Q And those would have been voting history  
7 based upon specific elections?

8 A Yes.

9 Q And which elections would you have used  
10 data from?

11 A So when I work -- when I would work on  
12 proposals for congressional redistricting, I would  
13 specifically look at '16, '18, and '20 election  
14 data.

15 Q Any years beyond that?

16 A Not in particular.

17 Q I'm sorry, not in particular? No years  
18 beyond that or -- can you clarify that answer?

19 A Sure.

20 When I was drafting congressional  
21 proposals, I was looking at '16, '18, and '20  
22 data. I did not --

23 Q Okay. And which --

24 A -- reference -- I did not reference any  
25 years prior to that.

1 Q Okay. And which elections from 2016,  
2 2018, and 2020?

3 A Statewide, federal elections, and  
4 Ohio-elected office holders, statewide office  
5 holders.

6 Q I'm sorry. If you could -- if you could  
7 just repeat the end of that again. I couldn't  
8 quite catch the -- I couldn't quite hear you.

9 A Yes. Statewide elections including state  
10 office holders, statewide office holders, and  
11 federal elections.

12 Q Okay. And those statewide office holders  
13 would be -- can you name those offices?

14 A Sure. Secretary of State, Treasury of  
15 State -- I'm sorry, Treasurer of State, the  
16 Attorney General, the -- who am I leaving out?  
17 Auditor, Treasurer, Secretary of State, Governor.

18 Q All right. Auditor, Treasurer, Secretary  
19 of State, Governor. Good.

20 Unless you can -- unless you can think of  
21 anyone else that is not on there.

22 A Attorney General?

23 Q Oh, AG. Yeah. Okay. We'll add that.

24 And where did this election -- sorry. I  
25 missed that.

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

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  
3 that maybe later. But before we get to that, I  
4 wanted to ask about your reporting.

14:56:08

14:56:14

14:56:18

5 Who did you report to regarding your work  
6 on congressional redistricting?

14:56:20

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  
10 form.

14:56:34

14:56:35

11 Is the question what means of  
12 communication did he use?

14:56:35

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  
17 congressional redistricting.

14:56:42

14:56:55

18 Q And where would you meet?

14:56:55

19 A We would meet in the congressional  
20 redistrict -- well, in the redistricting office,  
21 and we would also meet in the Riffe Center, and we  
22 would also meet in the State House.

14:56:56

14:57:02

14:57:04

14:57:08

23 Q Okay. So the State House, the -- I missed  
24 that second one. What center? What center?

14:57:10

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  
3 would be updating others on your progress or  
4 providing them with details about the maps that  
5 you were drawing, the general sort of definition  
6 of reports or what you would think of when you  
7 think of a report.

15:00:49

15:00:55

15:01:02

15:01:04

15:01:08

15:01:12

8 A Sure. Sure. Well, I didn't know if you  
9 meant something other than just general  
10 correspondence.

15:01:12

15:01:14

15:01:16

11 So, yeah, I would -- I would generally  
12 correspond with the Speaker, and I would generally  
13 correspond with our Chief of Staff.

15:01:17

15:01:19

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  
17 Oelslager?

15:01:32

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  
20 him about anything else?

15:01:41

15:01:47

21 A I reported to him about a congressional  
22 plan that was completed.

15:01:48

15:01:53

23 Q Okay. So while he was not -- while you  
24 were not in communication -- it sounds like you  
25 were not in communication during the process of

15:01:55

15:01:58

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  
2 President Huffman, or the Chiefs of Staff,  
3 Christine Morrison or John Barron?

4 A Yeah, I -- I can't -- I can't -- I would  
5 be speculating if I -- if I answered for anyone --  
6 anyone other than the Speaker and Christine. So  
7 I'll say that, yes, the Speaker and Christine came  
8 to the Green other than -- to the Green Building  
9 other than that meeting.

10 Q Okay. But you can't remember an  
11 occasion -- occasions on which Senate President  
12 Huffman came to the Green Building beyond that  
13 meeting?

14 A Correct. Yeah, I would be speculating on  
15 it. I don't know when he may or may not have been  
16 there. Because, again, I wasn't always there.

17 Q Okay. All right. Then we will -- oh,  
18 actually, one more thing.

19 Did you ever work on any written analyses  
20 of maps?

21 A Yes.

22 Q And what maps were those analyzing?

23 A The as-introduced version of House  
24 Bill 479 and the as-introduced version of the -- I  
25 don't recall the bill number, but the House

1 Democrat proposal, House Democrat caucus proposal,  
2 and ultimately the final map.

3 Q And those would have been produced to your  
4 counsel, correct?

5 A I -- yeah, I produced those.

6 Q Okay.

7 MS. BENDER: And, Counsel, again, I would  
8 ask that any of those that have not been produced  
9 are produced to us, and I will move along.

10 Sorry. Were you going to say something?

11 MR. MCGUIRE: No, just I understand what  
12 you're saying. I know of nothing again responsive  
13 that's not objectionable that hasn't been produced  
14 to you.

15 MS. BENDER: Okay. So it sounds like  
16 there may be certain of those analyses that have  
17 been withheld under an objection.

18 MR. MCGUIRE: I don't know that. I'm just  
19 saying I -- that would be the only -- one of the  
20 few reasons I could think that responsive  
21 documents would not have been produced.

22 MS. BENDER: Okay.

23 BY MS. BENDER:

24 Q All right. So I want to talk a little bit  
25 about the map that was introduced as House

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

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  
Conducted on December 7, 2021

41

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		

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

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

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

Transcript of Blake Springhetti  
Conducted on December 7, 2021

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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  
2 clarify when you said the general 2020 election  
3 Republican and Democratic percentages, did you  
4 mean Presidential election?

15:41:12

15:41:20

15:41:23

15:41:25

5 A Yes.

15:41:28

6 Q Okay. And would you have any other  
7 elections from -- from 2020 represented there?

15:41:29

15:41:32

8 A No. I don't think there were any other --  
9 I'd have to look. I don't think there were any  
10 others.

15:41:37

15:41:44

15:41:46

11 Q Okay. And you would have no elections  
12 from 2012 represented?

15:41:48

15:41:50

13 A Not -- no, I don't have any -- any  
14 election data from 2012 in my data view.

15:41:54

15:41:56

15 Q What about 2014? In Column W, we get to  
16 something that appears to indicate 2014 elections.

15:42:00

15:42:04

17 A Yeah, I didn't have anything, you know, in  
18 my data view on '14 elections.

15:42:07

15:42:14

19 Q Okay. And then we have '14 for a little  
20 while.

15:42:19

15:42:28

21 And Column AR we get to 2016. Did you  
22 have anything representing 2016 in your data view?

15:42:29

15:42:33

23 A Could you clarify the question?

15:42:38

24 Q Did you have any data representing 2016  
25 elections in your data view?

15:42:39

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  
2 more minutes, and then I think take a quick break.

3 In Column BW, we get to something starting  
4 with the heading "EA51." Do you recognize the  
5 acronym "EA"?

6 A Yes.

7 Q And what does "EA" generally stand for?  
8 Or what do you know it to stand for?

9 A I don't know what "EA" stands for. I just  
10 know it as EA51.

11 Q And what do you -- what is EA51?

12 A So EA51 generally is a ten-year lookback  
13 of election results for statewide state and  
14 federal elections.

15 But this in this column is not that. This  
16 is -- I actually don't know what EA51\_DV is  
17 because I don't have that on my --

18 Q Okay. So the -- generally you understand  
19 EA51 to be a ten-year lookback of election results  
20 for statewide state and federal elections.

21 Would you have -- I'm sorry. Would you  
22 have anything in your data view showing  
23 EA51-related data?

24 A Yes.

25 Q And what would that be?

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

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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

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



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

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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

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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

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:

2 Q But this also appears to be a version of  
3 this memo, correct?

4 A If you could just quickly scroll down to  
5 the bottom of it, yeah, I would -- I could see  
6 that.

7 Yeah. That appears to be the same memo,  
8 yeah.

9 MS. BENDER: Okay. So if we could go back  
10 to the -- actually, if we could mark this as  
11 Exhibit 4, please. Thank you.

12 And then if we could just go back to  
13 Exhibit 3 and stay at Page 6.

14 BY MS. BENDER:

15 Q So what was the general purpose of this  
16 memo?

17 A So I put that memo together, which is  
18 pretty typical. When we're dealing with any  
19 legislative business, we put, you know, brief  
20 summaries together for -- for members of the  
21 General Assembly in advance of a floor vote.

22 Q Okay. So the purpose was to summarize  
23 the -- summarize what would be going up on the  
24 floor then?

25 A And to -- I would say the purpose of the

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

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

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		avored 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  
2 members.

3 You can answer for anyone other than that.

4 BY THE WITNESS:

5 A So when we discussed 3.75 percent, that  
6 was an internal deliberation.

7 MS. BENDER: Okay. I will make the same  
8 response that, again, we don't believe this to be  
9 covered by the legislative privilege, and we can  
10 move on.

11 BY MS. BENDER:

12 Q When would this 3.75 percent figure have  
13 been discussed?

14 A Sometime between November 9th and  
15 November 15th.

16 Q Okay. Before the 4 percent figure was  
17 decided on?

18 A Yes. Yes. Before -- before that, yes.

19 MS. BENDER: All right. I think we're  
20 done with this exhibit then. And that would -- if  
21 we haven't already, can we mark that as Exhibit 5.  
22 I'm sorry about that.

23 And then, Ethan, after that, would you  
24 please pull up Springhetti00020.  
25

Transcript of Blake Springhetti  
Conducted on December 7, 2021

91

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  
2 and 2020 according to the note at the bottom of  
3 the page?

16:41:02

16:41:06

16:41:08

4 A That's correct.

16:41:08

5 Q Okay. Sorry. District 15 here, it says  
6 that -- well, actually, I guess to contextualize,  
7 these numbers would be the Republican percentage  
8 for this map in each of these districts based upon  
9 the data from federal elections from 2012 to 2020;  
10 is that right?

16:41:09

16:41:21

16:41:24

16:41:27

16:41:32

16:41:40

11 A This -- yeah, I would say that this --  
12 these are the, yeah, election results from -- for  
13 the races that are noted at the bottom from 2012  
14 to 2020.

16:41:40

16:41:44

16:41:47

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  
18 2012 to 2020 elections that we've talked about,  
19 this map is -- is projected to have a Republican  
20 percentage vote of what's listed in these  
21 column -- in this column under FED 12 to 2020 for  
22 each district?

16:41:57

16:41:59

16:42:02

16:42:10

16:42:13

16:42:19

23 A Could you -- could you rephrase -- or not  
24 rephrase. Could you restate your question.

16:42:20

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	A	It does say 53.7.	16:43:34
2	Q	Okay. So let's go to Page 2. On Page 2	16:43:38
3		at the top of this page, we have seven competitive	16:43:45
4		CDs, which I'm assuming stands for congressional	16:43:48
5		districts --	16:43:52
6	A	Yes.	16:43:53
7	Q	-- correct?	16:43:53
8		Yeah. Okay.	16:43:54
9	A	Yes.	16:43:54
10	Q	But this says .375 to point -- or to	16:43:55
11		3.8 -- or 3.75 to 3.8?	16:44:00
12	A	Yes, that's -- that's what it says.	16:44:04
13	Q	Okay. So it's -- so it's measuring	16:44:06
14		competitiveness based upon a metric of 3.75 to 3.8	16:44:09
15		rather than 4 percent?	16:44:14
16	A	Yeah, that's -- that appears to be what	16:44:18
17		this document's doing.	16:44:20
18	Q	And this is -- this is different than	16:44:22
19		the -- than the 4 percent that we've looked at	16:44:24
20		earlier. And this is also different than the less	16:44:26
21		than 3.75 percent I think that came up in the	16:44:29
22		last -- 3.75 percent or less that came up in the	16:44:37
23		last document, correct?	16:44:40
24	A	It is -- it is a different comparison	16:44:41
25		using different percentages.	16:44:47

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  
2           a very loose and subjective analysis.  Some will  
3           say plus or minus 5, some will say plus or minus  
4           10.  You know, there are Senate seats that exist  
5           today in the state Senate that are, you know, plus  
6           or minus 10 or more that members of the opposite  
7           party have won elections in.

16:45:57  
16:46:10  
16:46:17  
16:46:21  
16:46:25  
16:46:30  
16:46:36

8           So are there other measures of  
9           competitive -- competitiveness?  Sure.  But what  
10          is the most accurate?  And this is an accurate  
11          measure, and that's kind of what we discussed.

16:46:38  
16:46:45  
16:46:49  
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          introduced maps, House Bill 479, I think Chairman  
17          Oelslager referenced competitiveness and what he  
18          considered to be competitive and the metrics that  
19          he considered in -- in his sponsored testimony.

16:47:16  
16:47:22  
16:47:28  
16:47:32  
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  
24          plus or minus 5 was competitive.

16:47:52  
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

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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 unbiased 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)



C E R T I F I C A T E   O F   R E P O R T E R

I, MICHELLE M. YOHLER, a Certified  
Shorthand Reporter within and for the County of  
Will, State of Illinois, do hereby certify:

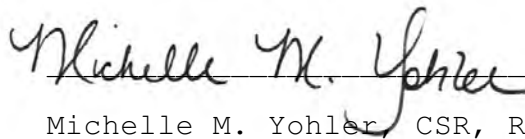
That previous to the commencement of the  
examination of the witness, the witness was duly  
sworn to testify the whole truth concerning the  
matters herein;

That the foregoing deposition transcript  
was reported stenographically by me, was  
thereafter reduced to typewriting under my  
personal direction and constitutes a true record  
of the testimony given and the proceedings had;

That the said deposition was taken  
remotely before me at the time and place  
specified;

That I am not a relative or employee or  
attorney or counsel, nor a relative or employee of  
such attorney or counsel for any of the parties  
hereto, nor interested directly or indirectly in  
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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6  
7  
8       

9           Michelle M. Yohler, CSR, RMR, CRR

10          Certified Shorthand Reporter

11          CSR No.: 84-4531  
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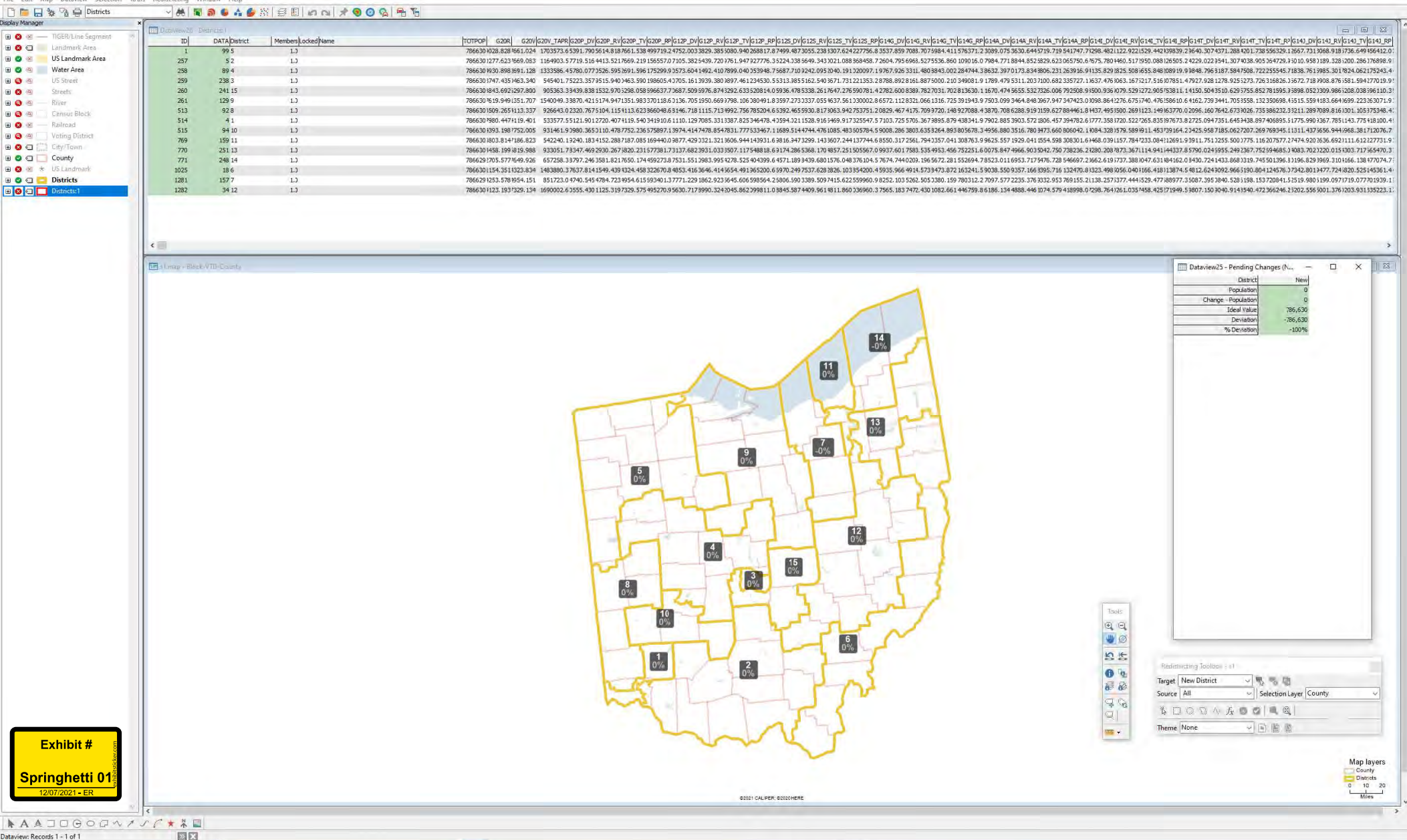


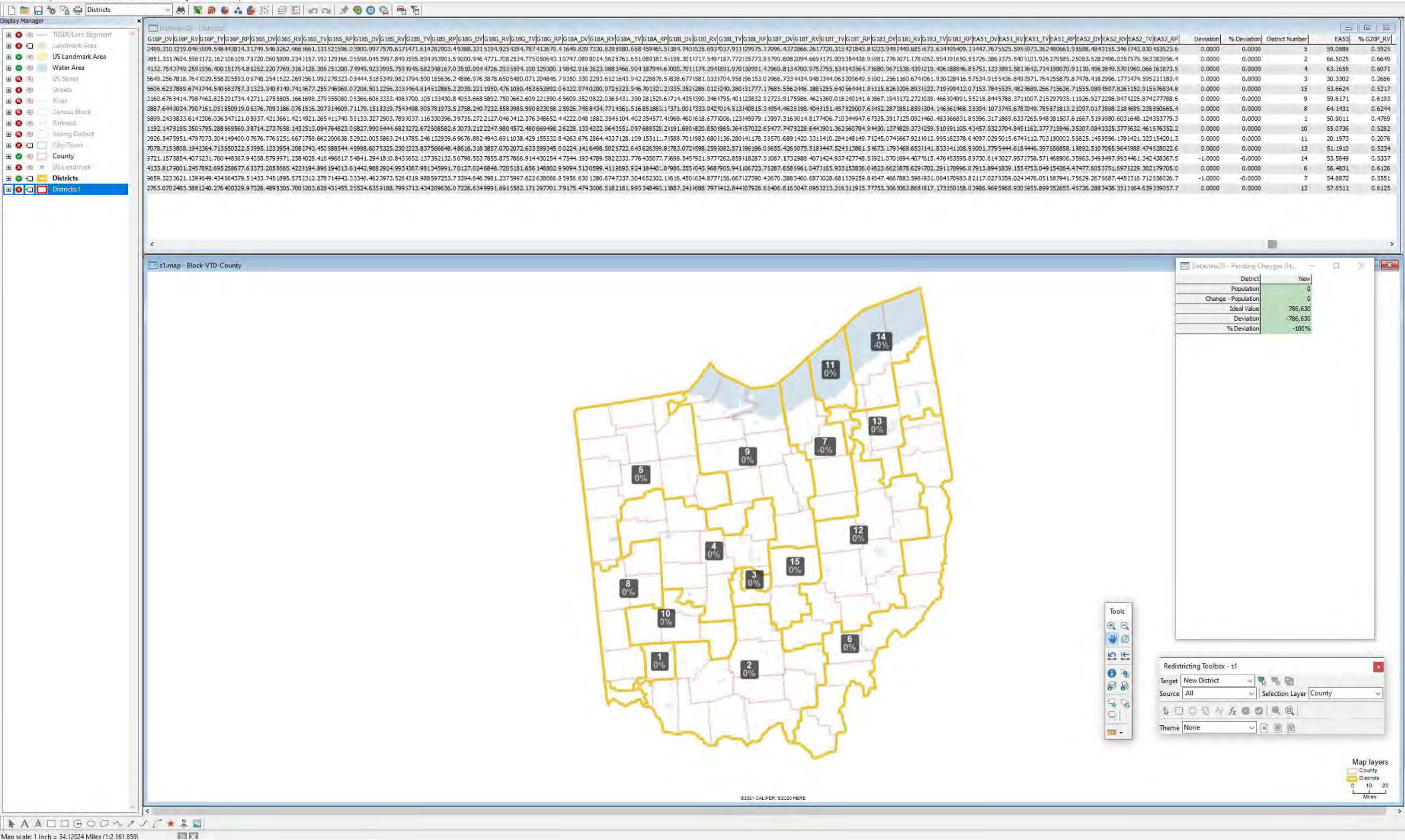
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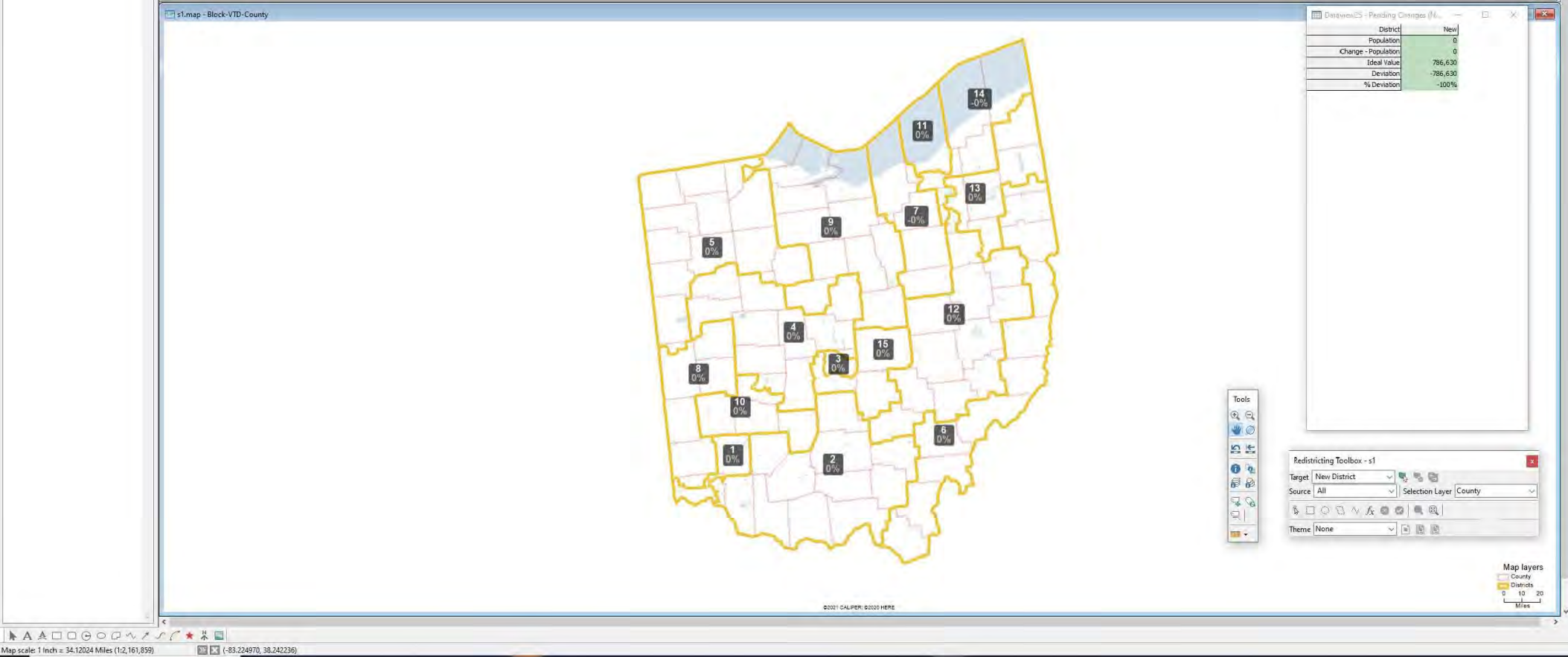
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# **Exhibit 4**







[illegible]

ID	DATA	District	Members	Locked	Name	TOTPOP	G20R	G20V	G20V_TAPR	G20P_DV	G20P_RV	G20P_TV	G20P_RP	G12P_DV	G12P_RV	G12P_TV
1	99	5	1			786630	549028.83	397661.02	1703573.6	155391.79	235614.82	397661.54	1499719	184752	193829.39	386080.94
257	5	2	1			786630	530277.62	397669.08	1164903.5	127719.52	264413.52	397669.22	1156557	137105.38	216439.72	359761.95
258	89	4	1			786630	534930.9	412691.13	1333586.4	155780.08	250526.6	412691.6	1175300	140573.6	211492.41	357899.04
259	238	3	1			786630	523747.44	370463.34	545401.7	265223.36	99515.94	370463.59	198605.4	230705.16	113939.38	349897.46
260	241	15	1			786630	528843.69	386297.8	905363.3	178439.84	201532.97	386298.06	696637.7	160687.51	166976.87	333292.63
261	129	9	1			786630	527619.95	381351.71	1540049.3	138870.42	236174.95	381351.98	1370119	180136.71	181950.67	369798.11
513	92	8	1			786630	530509.27	394113.34	926643	142320.77	246104.12	394113.62	866048.6	138146.72	221115.71	364992.76
514	4	1	1			786630	557980.45	404119.4	533577.5	205121.9	192720.41	404119.54	341910.6	181110.13	187085.33	373387.83
515	94	10	1			786630	544393.2	397752.01	931461.9	180980.37	210110.48	397752.24	675897.1	183974.41	197478.85	387831.78
769	159	11	1			786630	550803.81	357186.82	542240.1	279240.18	74152.288	357187.09	169440	319877.43	70321.321	393606.94
770	251	13	1			786630	538458.2	406819.99	933051.7	188347.47	212930.27	406820.23	677381.7	203137.68	173931.03	383507.12
771	248	14	1			786629	552705.58	437649.93	657258.3	198797.25	233581.82	437650.17	459273.8	197531.55	200984	404278.53
1025	18	6	1			786630	551154.35	394323.83	1483880.3	147637.81	241549.44	394324.46	1322671	204853.42	173646.41	385654.49
1281	157	7	1			786629	534253.58	404954.15	851723	174740.55	224784.72	404954.62	693401.3	177771.23	181862.92	365645.61
1282	34	12	1			786630	519123.19	377329.13	1690002.6	140555.43	231125.32	377329.58	1495271	185630.72	168990.32	362045.86



G12P_RP	G12S_DV	G12S_RV	G12S_TV	G12S_RP	G14G_DV	G14G_RV	G14G_TV	G14G_RP	G14A_DV	G14A_RV	G14A_TV	G14A_RP	G14I_DV	G14I_RV
1268818	177499.49	183055.24	378307.62	1227757	63537.859	137088.71	206984.41	1576371	73089.075	133630.64	206719.72	1541748	68298.482	121122.92
927776.3	136224.04	196649.34	350021.09	868458.7	52604.795	146968.53	205536.86	1109016	67984.771	138844.85	206829.62	1065751	57675.78	134460.52
1053949	136687.71	199242.1	352040.19	1020097	49767.926	153311.48	208843	1284744	58632.397	150173.83	208806.23	1263917	54135.829	142825.51
234530.5	226313.99	105162.54	343671.73	221353.2	78788.892	88161.887	176000.21	349081.9	91789.479	85311.203	177100.68	335727.1	90637.476	78063.167
620814	155936.48	155338.26	327647.28	590781.4	52782.6	118389.78	177031.7	813630.1	61670.474	115655.53	177326.01	792508.9	58500.936	109079.53
1080492	173597.27	170337.06	364637.56	1030003	66572.112	138321.07	211316.73	1391944	77503.099	133464.85	210967.95	1347423	73098.864	122276.68
785204.6	136392.47	205930.82	358063.94	753751.2	50829.467	144176.71	199720.15	927088.4	63870.708	136288.92	200159.63	884461.8	54437.495	133500.27
346478.4	180594.02	171528.92	365469.92	325547.5	67103.725	125706.37	199895.88	438341.9	87902.885	113903.57	201806.46	394782.6	73777.358	113720.52
633467.1	181689.51	184744.48	381085.48	605784.5	69008.286	143803.64	218264.89	805678.3	74956.88	143516.78	218473.66	806042.1	74084.328	130579.59
143931.6	299816.95	63299.143	373607.24	137744.6	108550.32	72561.794	190357.04	308763.9	119625.56	71929.041	191554.6	308301.6	129468.04	51157.784
548818.6	199174.29	155368.17	374857.25	505567	69937.601	127583.54	204953.46	752251.6	80075.847	124966.9	205042.75	738236.2	84280.208	107873.37
404399.6	194571.19	178439.68	391576.05	376104.5	67674.744	160209.2	235672.28	552694.7	78523.011	156953.72	235476.73	546697.2	83662.619	135737.39
965200.6	206970.25	147537.63	372826.1	854200.4	85935.966	124914.57	218473.87	1163242	99038.55	119357.17	218395.72	1132471	98323.498	105056.04
598564.2	176806.69	163389.51	357415.62	559960.9	58252.103	135262.51	200380.16	780312.2	67097.577	132235.38	199332.95	769155.2	71138.257	115377.44
1099811	178845.59	154409.96	354811.86	1036960	67565.183	127472.43	201082.66	1446760	76186.134	124888.45	201074.58	1418998	77298.764	110261.04

G14I_TV	G14I_RP	G14T_DV	G14T_RV	G14T_TV	G14T_RP	G14J_DV	G14J_RV	G14J_TV	G14J_RP	G16P_DV	G16P_RV	G16P_TV	G16P_RP	G16S_DV
201529.44	1439839	59640.307	134371.29	204201.74	1556329	82667.731	123068.92	205736.65	1456412	142499.31	213219.05	376509.55	1443814	121749.55
202950.09	1026505	54229.022	139541.31	204038.91	1064730	66010.958	140189.33	206200.29	1076899	109851.33	237604.6	363172.16	1106110	89720.06
206655.85	1208920	49848.796	148187.58	207508.72	1255546	71838.761	135985.3	207824.06	1175243	124132.75	220749.26	361956.4	1151755	96252.22
175217.52	307851.4	87927.928	81278.925	176273.73	316826	106672.72	69908.876	176581.59	277019.9	235649.26	97818.764	350029.56	205593	196748.25
175272.91	753811.1	54150.504	113510.63	175755.85	781595.9	75898.052	100309.99	176208.04	696110.3	145606.62	177889.67	339744.54	683787.3	121323.34
206740.48	1258611	64162.739	133441.71	208558.13	1350698	86515.559	124183.66	210699.22	1263072	130160.68	208414.8	357462.83	1291734	112711.28
198123.15	863770	52096.16	137642.67	199026.74	886232.3	63211.289	137089.82	200301.11	875348.4	122887.64	229034.79	367161.05	850919	96376.709
197265.84	397673.8	72725.094	117351.65	199438.9	406895.6	81775.99	119367.79	201143.78	418100.4	176899.24	178833.61	372306.04	347121	138937.42
214911.45	739164.2	70425.958	137185.06	217207.27	769345.1	91311.437	125656.94	216968.38	712076.7	161192.15	198195.35	376795.29	669560.3	128714.27
187233.08	212691.9	133911.75	50255.5	190775.12	207577.2	137474.92	52636.692	190111.61	227731.9	280926.55	65951.479	357073.3	149400	237676.78
201114.94	644337.8	75790.024	116955.25	202367.75	694685	94083.702	110220.02	204303.72	665470.3	167078.72	188808.19	372364.71	650322.5	140995.12
229047.63	484162	78430.724	141433.87	230319.75	501396.8	100196.83	133969.31	234166.14	477074.7	169721.16	208854.41	395231.76	448367.9	134358.58
214166.42	1013875	84812.624	119092.97	215190.8	1124576	97342.801	119477.72	216820.53	1145361	144133.82	219001.25	377892.7	1258678	140373.21
195529.48	688977.3	66087.395	120840.53	196198.15	720841.5	82519.98	116199.1	198719.08	701939.1	149659.32	193621.14	359649.43	664379.5	121433.75
197458.43	1271950	69807.15	119040.91	198540.47	1366246	85202.556	115001.38	200203.93	1335223	132763.07	202483.39	351240.28	1400330	117328.49

G16S_RV	G16S_TV	G16S_RP	G18S_DV	G18S_RV	G18S_TV	G18S_RP	G18G_DV	G18G_RV	G18G_TV	G18G_RP	G18A_DV	G18A_RV	G18A_TV	G18A_RP
229262.47	368661.13	1521596	143901	147570.62	291471.61	1282903	119388.33	165194.93	294284.79	1413670	121649.84	167330.83	288980.67	1459466
255809.23	360157.19	1129166	116598.05	173997.85	290595.89	993901.5	99000.946	184771.71	292534.78	1050643	100747.09	188014.56	288761.65	1089188
247769.32	359128.21	1251201	134949.92	169995.76	304945.68	1048167	113510.09	184726.29	306594.1	1129300	109842.92	193623.99	303466.9	1187945
131522.27	342561.99	278323	218444.52	75349.982	293794.5	185636.2	204886.98	83878.65	295480.07	204845.7	199350.33	92293.612	291643.94	228878.5
198149.74	334677.26	746969	147208.5	132256.31	279464.81	612885.2	132039.22	141950.48	281080.45	653892	126122.97	150200.97	276323.95	701321.2
218805.17	351698.28	1355080	136366.61	143333.5	279700.11	1133431	114053.67	155892.75	280662.61	1221591	115609.35	160822.04	276431.39	1281530
250186.08	361516.21	914609.7	121179.15	168319.75	289498.91	781973.5	103758.24	177232.56	289985.99	823058.2	105926.75	178434.77	284361.52	851863.1
210661.42	364921.27	411740.5	166133.33	142903.79	309037.12	330396.3	149735.27	152127.05	310412.38	348652.4	154222.05	151882.35	306104.4	354577.4
227658.14	372513.09	764823	156827.99	146444.68	303272.67	608582.6	133073.21	162247.98	304572.48	669498.2	136228.13	164322.96	300551.1	688528.2
86251.667	340758.66	200638.5	232922.01	46863.241	279785.25	132939.6	219676.88	54943.691	281038.43	155532.8	224263.68	52864.433	277128.11	153111.7
200954.21	362743.45	688544.4	166998.61	135325.23	302323.84	566648.4	148616.32	143857.07	302072.63	599345	150224.14	146498.5	296722.64	626399.8
229971.26	384028.42	496617.5	174841.29	151810.84	326652.14	392132.5	150798.55	167855.88	327866.91	430254.4	157544.19	164789.58	322333.78	435077.7
208665.42	368194.9	1194014	151442.99	142924.99	294367.98	1045992	130127.02	156848.72	295181.66	1148803	129094.51	160599.41	289693.92	1184401
211895.58	352312.28	714942.3	153346.46	140973.53	294319.99	597253.7	133394.65	153981.24	295997.62	638066.8	135956.63	151380.67	287337.3	652302.1
208305.7	345203.63	1431455	136524.64	139188.8	275713.43	1209636	117226.63	149991.69	276582.17	1297702	119175.47	153006.52	272181.99	1348493

G18I_DV	G18I_RV	G18I_TV	G18I_RP	G18T_DV	G18T_RV	G18T_TV	G18T_RP	G18J_DV	G18J_RV	G18J_TV	G18J_RP	EA51_DV	EA51_RV	EA51_TV
111384.74	163535.69	287037.91	1429975	117096.44	162866.26	287720.32	1421844	114223.95	172449.69	286673.63	1495409	139447.77	206525.6	345973.36
95198.301	179717.55	287187.77	1035774	98799.608	182094.67	288175.91	1054439	96981.776	189071.18	286052.95	1091651	115726.39	229375.54	345101.93
110000.7	181174.29	301891.97	1130991	110969.81	184700.98	302755.53	1143565	108680.97	191538.44	300219.41	1188847	125751.13	233891.58	359642.71
199838.68	78581.033	288704.96	196153	199966.73	84434.948	290344.06	209649.5	196901.26	91160.674	288061.93	228416.5	217534.92	115436.85	332971.76
130335.35	135288.01	275240.38	631777.1	127685.56	142446.19	276255.64	664441.8	125115.83	149206.89	274322.72	699412	147153.78	186535.48	333689.27
109714.44	153390.35	274795.4	1223833	112723.92	155986.46	276360.02	1240142	110867.19	163172.27	274039.47	1304992	135218.84	195788.37	331007.22
97371.001	177333.04	287014.51	840815.3	104954.46	176198.4	288151.46	829007.6	103452.29	182851.86	286304.15	861468.3	118304.11	223745.68	342049.79
141968.46	148618.68	305006.12	345979.1	150997.32	149014.82	307406.71	344947.6	147335.39	157125.09	304460.48	366831.8	165396.32	191869.63	357265.95
129191.69	156820.85	298985.36	657022.6	135477.75	158228.64	300901.36	660784.9	134430.14	164829.37	299259.51	691105.4	150457.53	200704.85	351162.38
213588.7	48983.68	273136.28	141178.3	219570.69	51420.331	276410.28	148149.7	218245.07	56667.921	274913	162378.6	244097.03	75015.674	319112.7
142783.07	139598.26	295082.57	596196	146655.43	146075.52	299447.52	613861.5	144673.18	150468.65	295141.83	641108.9	169001.78	185444.62	354446.4
145698.55	157921.98	317262.86	418287.3	151087.17	162988.41	321424.94	427748.5	145921.07	171694.41	317615.48	453595.8	169730.61	213027.96	382758.57
127986.36	149043.97	287905.94	1106724	126287.66	156961.05	290165.93	1153836	129823.66	156878.63	286702.29	1170996	157913.89	186839.16	344753.05
128616.45	146634.88	287156.67	627390.4	132670.39	150460.69	290028.68	639259.8	129047.47	157883.6	286931.06	670983.8	152117.03	198359.02	350476.05
123887.24	139688.8	273412.84	1207929	116406.62	150047.1	273213.22	1311916	117753.31	153063.87	270817.17	1350158	140986.97	185968.93	326955.9

EA51_RP	EA52_DV	EA52_RV	EA52_TV	EA52_RP	Deviation	% Deviation	District Number	EA53	% G20P_RV	% EA51_RV	% EA52_RV	Ideal Value	District Label
1480662	138588.48	190155.35	328743.83	1453524	0	0	5	59.08879	0.592501	0.596941	0.57843	786630	5 0%
1079585	115083.53	212496.04	327579.56	1083956	0	0	2	66.50253	0.664908	0.66466	0.648685	786630	2 0%
1198071	131110.5	210849.57	341960.07	1161874	0	0	4	63.16555	0.607055	0.650344	0.616591	786630	4 0%
255879.8	227478.42	92996.177	320474.6	211183.4	0	0	3	30.33022	0.268625	0.346687	0.290183	786630	3 0%
715636.7	151555.09	164597.83	316152.92	676834.8	0	0	15	53.66239	0.521703	0.55901	0.520627	786630	15 0%
1297935	131926.93	182298.95	314225.87	1277789	0	0	9	59.61713	0.61931	0.591493	0.580153	786630	9 0%
871813.2	121097.02	203598.22	324695.24	850665.4	0	0	8	64.14315	0.62445	0.654132	0.627044	786630	8 0%
381507.6	171667.52	169980.6	341648.12	353779.3	0	0	1	50.90107	0.47689	0.53705	0.497531	786630	1 0%
715946.3	155307.08	180325.38	335632.46	676352.2	0	0	10	55.07358	0.528245	0.571544	0.53727	786630	10 0%
190002.5	246825.15	59596.178	306421.32	154201.3	0	0	11	20.19732	0.207601	0.235076	0.194491	786630	11 0%
656858.1	169892.51	167095.96	336988.47	628022.6	0	0	13	51.19096	0.523401	0.523195	0.495851	786630	13 0%
468906.3	175963.35	188497.99	364461.34	438367.5	-1	-0.000001	14	53.58486	0.533718	0.55656	0.517196	786630	14 -0%
1154264	147477.61	180751.7	328229.3	1179705	0	0	6	56.48309	0.612565	0.541951	0.550687	786630	6 0%
687941.7	155629.27	176687.45	332316.71	656026.7	-1	-0.000001	7	54.88716	0.555086	0.56597	0.531684	786630	7 -0%
1352655	136726.29	173438.35	310164.64	1339058	0	0	12	57.65107	0.612529	0.568789	0.559182	786630	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



## 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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## **Substitute Senate Bill 258: A Congressional Redistricting Plan**

### **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 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.
- 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.
- Article XIX, section 2 (B)(5) 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 congressional districts) and five counties may be split twice (meaning a portion of the county boundary is included in three congressional districts).
- 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.
- 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*
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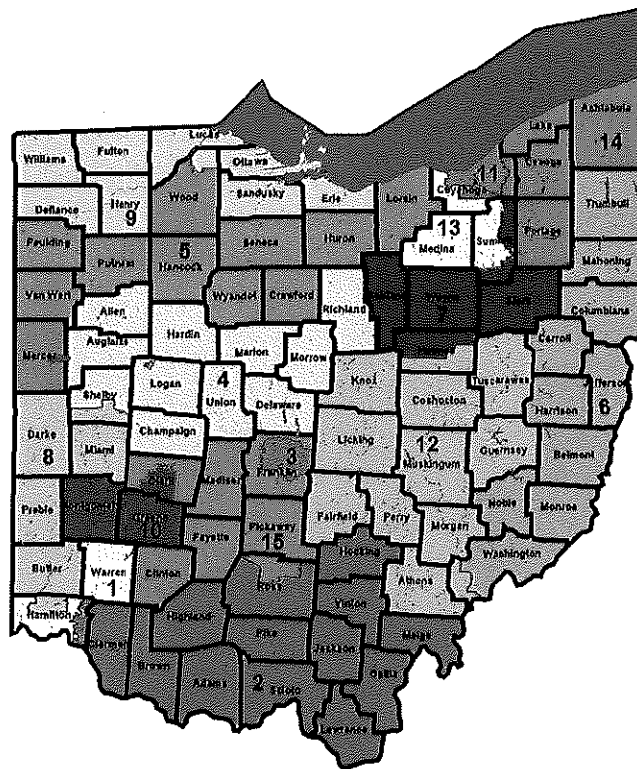
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BOC 04/04





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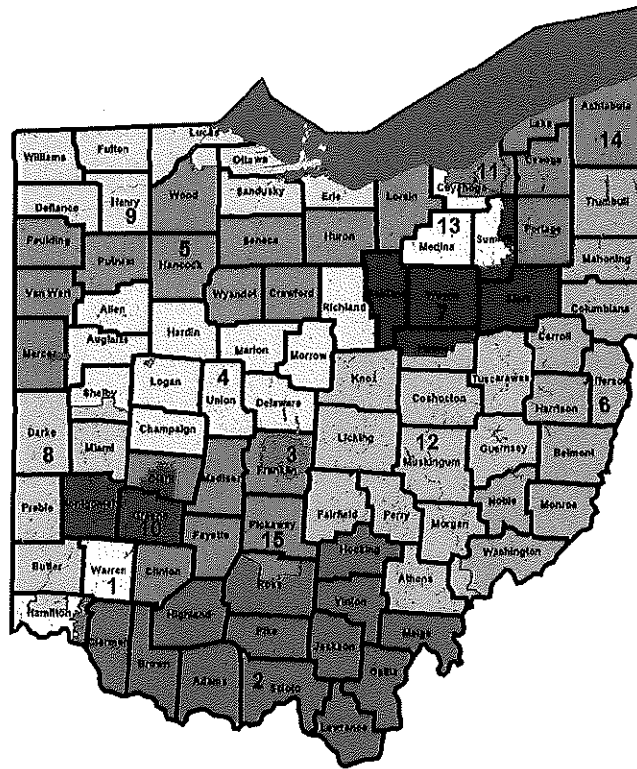
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8/20/2019



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  - 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

HC499





**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 R/D/I	FED
			<u>16 to 20</u>	<u>20 only</u>	<u>20 only</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

